Exhibit No.:

Issues: Environmental Impacts

Witness: Shaw Sponsoring Party: MO P

Shawn E. Lange MO PSC Staff

Type of Exhibit:

Surrebuttal Testimony

Case No.:

EA-2014-0207

Date Testimony Prepared:

October 14, 2014

MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REVIEW DIVISION

SURREBUTTAL TESTIMONY

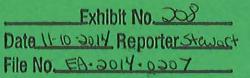
OF

SHAWN E. LANGE

GRAIN BELT EXPRESS CLEAN LINE LLC

CASE NO. EA-2014-0207

Jefferson City, Missouri October 2014



BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Grain)	
Belt Express Clean Line LLC for a	•	
Certificate of Convenience and Necessity	*	
Authorizing It to Construct, Own,	,	
Operate, Control, Manage, and Maintain a	*	CN- EA 2014 0207
High Voltage, Direct Current)	Case No. EA-2014-0207
Transmission Line and an Associated)	
Converter Station Providing an)	
Interconnection on the Maywood -)	
Montgomery 345 kV Transmission Line)	

AFFIDAVIT OF SHAWN E. LANGE

STATE OF MISSOURI)
) s
COUNTY OF COLE)

Shawn E. Lange, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 2 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

Shawn E. Lange

Subscribed and sworn to before me this 10th day of October, 2014.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914

Notary Public

1 2	•	SURREBUTTAL TESTIMONY	
3		OF	
5		SHAWN E. LANGE	
6 7		GRAIN BELT EXPRESS CLEAN LINE LLC	
8 9		CASE NO. EA-2014-0207	
10 11			
12	Q.	Please state your name and business address.	
13	A.	My name is Shawn E. Lange and my business address is Missouri Public	
14	Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.		
15	Q.	Are you the same Shawn Lange who filed rebuttal testimony in this case?	
16	A.	Yes.	
17	Overview		
18	Q.	Have you reviewed the rebuttal testimonies of Michael Goggin, filed on behalf	
19	of Wind on the Wires and the Wind Coalition, and of Frank Costanza, filed on behalf of		
20	0 Tradewind Energy, Inc.?		
21	A.	Yes. I have reviewed these filed testimonies, among others.	
22	Response to	Constanza and Goggins	
23	Q.	Are you familiar with Mr. Constanza's assertion at pages 4-5 of his rebuttal	
24	testimony that "[t]he inherent flexibility of 111(d) allows each state to craft solutions best		
25	suited to its needs. Clearly, one alternative would make Great Plains wind plus gas fired		
26	generation a very likely solution to meet both air emissions goals, while delivering a very cost		
27	effective energy supply solution"?		
28	A.	Yes, I have reviewed Mr. Constanza's testimony regarding this assertion.	

Q. Are you familiar with Mr. Goggins' claim at page 2 of his rebuttal testimony that "...the Project is needed to deliver low cost wind power to Missouri, and states in MISO and PJM so they can ... comply with the US EPA's Clean Power Plan rule (pursuant to section 111(d) of the Clean Air Act)...."?

- A. Yes, I have reviewed Mr. Goggins' testimony regarding this claim.
- Q. Do you agree with what Mr. Constanza and Mr. Goggins testify regarding wind and compliance with the US EPA's Clean Power Plan rule?
- A. While it is true that the guidelines in the proposed EPA rule under section 111(d) of the Clean Air Act allow for, and include, renewable energy as a "building block" for compliance, the amount and to what degree the Grain Belt Express project would help Missouri to comply with the guidelines will not be known until after the guidelines in the final EPA rule are issued in June 2015, the state compliance plan is developed, reviewed and accepted by the US EPA and Missouri state rules are promulgated by the Missouri Department of Natural Resources in June 2016, or later if extensions are requested and granted.
 - Q. Does this conclude your Surrebuttal Testimony?
 - A. Yes.

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