

**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 High Voltage, Direct) Case No. EA-2016-0358
Current Transmission Line and an Associated Converter)
Station Providing an Interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

In the Matter of the Joint Application of Invenergy)
Transmission LLC, Invenergy Investment Company)
LLC, Grain Belt Express Clean Line LLC and Grain) Case No. EM-2019-0150
Belt Express Holding LLC for an Order Approving)
the Acquisition by Invenergy Transmission LLC of)
of Grain Belt Express Clean Line LLC)

NOTICE OF COMPLIANCE

Grain Belt Express LLC (“Grain Belt Express”), for its Notice of Compliance to the Missouri Public Service Commission (“Commission”) states as follows:

1. On March 20, 2019, the Commission issued its Report and Order on Remand granting Grain Belt Express’ application for a Certificate of Convenience and Necessary (“CCN”) in Case No. EA-2016-0358, which took effect on April 19, 2019. In its Report and Order on Remand, the Commission adopted and incorporated the conditions agreed upon by Grain Belt Express and Commission Staff as set forth in Exhibit 206, which was attached to the Report and Order on Remand as Attachment 1.

2. Section III.4 of Exhibit 206 requires Grain Belt Express to file “annual status updates” on discussions with Staff regarding the need for additional studies of the impacts of Grain Belt Express’ facilities on other facilities in Missouri, a summary of the results of any additional studies, and any mitigation measures that have been implemented to address underground metallic structures, telecom facilities and AC lines.

3. On June 5, 2019, in Case No. EM-2019-0150, the Commission issued a Report and Order approving the acquisition of Grain Belt Express by Invenergy Transmission LLC (“Invenergy”). That Report and Order was amended on September 11, 2019 to clarify that Invenergy will be required to exercise its control such that Grain Belt Express complies with all conditions placed on the granting of its CCN, not that Invenergy will be required to independently comply with each of those conditions. The Amended Report and Order was effective on September 21, 2019.

4. The Amended Report and Order in Case No. EM-2019-0150 approved the acquisition of Grain Belt Express by Invenergy subject to the same conditions placed upon Grain Belt Express in the Report and Order on Remand in Case No. EA-2016-0358, including Exhibit 206.

5. In compliance with Section III.4 of Exhibit 206, as adopted and incorporated by the Report and Order on Remand in Case No. EA-2016-0358 and the Amended Report and Order in Case No. EM-2019-0150, Grain Belt Express submits the Annual Report attached hereto as **Exhibit A**.

WHEREFORE, Grain Belt Express requests that the Commission take notice of its compliance with the condition cited above.

Respectfully submitted,

/s/ Andrew O. Schulte

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ATTORNEYS FOR GRAIN BELT EXPRESS LLC



April 19, 2023

Hon. Nancy Dippell
Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102-0360

RE: Grain Belt Express Annual Report

Dear Judge Dippell,

Pursuant to Exhibit 206 of the March 20, 2019 Report and Order on Remand in Docket No. EA-2016-0358, and the June 5, 2019 Amended Report and Order in Docket No. EM-2019-0150, Grain Belt Express LLC (“Grain Belt Express”) hereby submits an annual status update. While the “annual status update” required by Exhibit 206, Section III.4 only requires Grain Belt Express to address the impacts of its facilities on other nearby facilities in Missouri, this filing addresses the required information and also provides a general progress update for the benefit of the Missouri Public Service Commission (“Commission”) and the public.

General Overview

Since closing on its acquisition of Grain Belt Express in January of 2020, Invenergy Transmission LLC (“Invenergy Transmission”) has been focused on project development activities. Work on these activities in 2022 and Q1 of 2023 has focused on landowner outreach, local engagement, land acquisition, environmental assessments and agency engagement, engineering design, field work and public education about the need and benefits of the project. This has included:

- Executing new voluntary easement agreements and issuing easement payments to landowners along the Project route.
- Maintaining field office presence to support development efforts, and in 2022, adding administrative staff to support regular office hours for addressing landowner questions and concerns.
- Continuing dialogue with state and local officials and other stakeholders to introduce Invenergy Transmission as the new Project owner and to provide status updates.
- Active engagement with all federal and state environmental regulatory agencies.
- Updates and refinements to tower locations taking into account landowner comments and places where the project crosses existing infrastructure.
- Transmission alignment and tower locations refined to minimize environmental impacts.



- Preparing the data and deliverables necessary to proceed with detailed engineering and construction.
- Initiation and completion of Environmental Impact Statement (EIS) scoping process as part of the federal National Environmental Policy Act (NEPA) review.
- Limited field activities continued on certain parcels where the Project had voluntary easement or access agreements in place with landowners or owned the parcels in fee simple.
- Selection of engineering, environmental permitting, field work and land services contractors who are now actively performing contract services.
- Maintaining the Grain Belt Express Facebook page, which provides project updates and announcements to the public.
- Maintaining the Grain Belt Express website (www.GrainBeltExpress.com) and ensuring questions received via the website, hotline phone number and company email were addressed in a timely manner. One project education initiative delivered in 2022 included the relaunch of the Grain Belt Express website, which included updates to the homepage, as well as the pages for project benefits, states (Kansas, Missouri and Illinois), landowner resources and news.
- Maintaining and providing project-specific collateral materials used as informational hand-outs for local stakeholders and landowners along the project route.
- Expanding the Project's community relations program, including:
 - Conducting numerous project stakeholder update briefings;
 - Establishing and distributing funds via the Grain Belt Express Community Grant program;
 - Establishing memberships and maintaining engagement with local chambers of commerce, economic development councils and school districts along the Grain Belt Express route; and
 - Sponsoring the Missouri State Fair, county fairs and auctions along the route.

State Regulatory Approvals and Appeals

Illinois

On July 26, 2022 Grain Belt Express filed an application with the Illinois Commerce Commission ("ICC") for an Order (1) granting Grain Belt Express a Certificate of Public Convenience and Necessity ("CPCN") pursuant to § 8-406.1 of the Public Utilities Act ("PUA"), 220 ILCS 5/8- 406.1, to, directly or through one or more affiliates or third-party contractors, construct, operate and maintain a high voltage direct current electric service transmission line and related facilities to be known as the Grain Belt Express transmission line (the "Project"), and to conduct a transmission public utility business in connection therewith; (2) authorizing Grain Belt Express, pursuant to § 8-503 and § 8-406.1(i) of the PUA, 220 ILCS 5/8- 503 and 220 ILCS 5/8-406.1(i), to construct the high voltage direct current electric service transmission line and related facilities; and (3) granting Grain Belt Express certain other relief in connection with its operations in Docket No. 22-0499.



On March 8, 2023, the ICC issued a Final Order granting Grain Belt Express' request pursuant to Sections 8-406(b-5), 8-406.1, and 8-503 of the Public Utilities Act, subject to certain conditions outlined in Sections IV.E., IV.D.1 and Appendix B and Section VII.A. of the Order.

Missouri

On August 24, 2022 Grain Belt Express filed an application to the Missouri Public Service Commission to amend its existing certificate of public convenience and necessity ("CCN") to construct, install, own, operate, maintain and otherwise control and manage an approximately 800-mile, overhead, multi-terminal ± 600 kilovolt ("kV") high-voltage, direct current ("HVDC") transmission line and associated facilities including converter stations and alternating current ("AC") connector lines (the "Project") in File No. EA-2023-0017.

The Application seeks Commission approval of the following material changes to the design and engineering of the Project:

- a. Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW;
- b. Relocating the AC connector line from Ralls County to Monroe, Audrain, and Callaway Counties, allowing for greater access of renewable power to Missouri and increasing benefits to Missouri; and
- c. Constructing the Project in two phases, allowing Missouri to realize the benefits of the Project earlier than it otherwise would.

There are no material changes to the design and engineering of the HVDC transmission line located in Missouri and Grain Belt Express continues to develop that aspect of the Project.

Indiana

On January 23, 2023, Grain Belt Express and Invenenergy Transmission LLC filed an update report to the Indiana Utility Regulatory Commission (the "Commission" or "IURC") which outlined the project modifications contemplated in the earlier Illinois CPCN and Missouri CCN amendment filings and which were informally discussed with both the Commission and the Office of Utility Consumer Counselor ("OUCC") in November 2022. During those discussions, Grain Belt Express stated that it did not believe the modifications necessitated any amendment or modification to the Order in Cause No. 45294, and it is Grain Belt Express' understanding that the Commission and OUCC concur.



Kansas

On March 10, 2023, Grain Belt Express filed a motion at the Kansas Corporation Commission (“KCC”) to amend the Unanimous Settlement Agreement submitted in Docket No. 19-GBEE-253-ACQ. The proposed amendment is limited to the “Financing Requirement” of the Unanimous Settlement Agreement which will allow the project to be financed and constructed in two phases, thereby allowing the benefits of the Project to accrue in Kansas and Missouri sooner than they otherwise would.

Federal Energy Regulatory Commission Filings

On August 8, 2022 Invenergy Transmission LLC on behalf of its subsidiary Grain Belt Express LLC submitted a complaint to the Federal Energy Regulatory Commission (“FERC”) in Docket No. EL22-83 requesting that FERC revise the open access transmission tariff (“Tariff” or “OATT”) of the Midcontinent Independent System Operator, Inc. (“MISO”) to provide a transparent and well-defined process to incorporate advanced-stage merchant transmission projects in the base case analysis that MISO undertakes each year as part of its Transmission Expansion Plan (“MTEP”), including MISO’s Long Range Transmission Plan (“LRTP”) and to obtain relief with regard to the LRTP decisions MISO has made to date. On April 2, 2023, Invenergy Transmission LLC submitted a motion to file supplemental information and supplemental information in support of the complaint.

Grain Belt Express has made no other filings with FERC since the effective date of its Missouri CCN.

Transmission Line Engineering and Environmental Permitting

Invenergy Transmission and Grain Belt Express have contracted with transmission line engineering and environmental permitting firms to advance the design of the Project transmission line, secure environmental permits and authorizations required by federal and state agencies to construct the Project, and act as an overall project manager to coordinate between Project disciplines.

In 2022 Grain Belt Express decided to seek a federal loan guarantee from the Department of Energy Loan Programs Office (DOE LPO) and, as such, the Project must undergo a National Environmental Policy Act (“NEPA”) review. DOE LPO initiated the Environmental Impact Statement (“EIS”) public scoping process in December 2022, completing it in February 2023. DOE LPO, with assistance from Grain Belt Express, began drafting the EIS in February 2023.

Engineering is steadily progressing with efforts focused on supporting environmental permitting, crossing agreements, and land acquisition. These efforts include desktop assessments and field surveys, discussions with relevant permitting agencies, and refining designs for crossings of water bodies, other utilities, railroads, highways and other infrastructure.



The engineering and environmental teams are evaluating landowner concerns through strict adherence to the Grain Belt Express Code of Conduct, establishing communication between Invenergy Transmission and landowners that is factual and in good faith, respectful and reflective of fair dealings, and conducted with respect to the privacy of property owners and other persons.

Engineering has drafted material, electrical, and converter station specifications to advance detailed engineering and prepare for construction of the Project. Engineering has also executed supply agreements for converter stations and overhead conductor to support the project. Supporting similar objectives, the engineering team has continued acquiring geotechnical borings covering both the transmission line and converter stations, begun full-scale lattice tower testing, and prepared for insulator assembly RIV and corona testing. Engineering has also begun planning for operations of the Project by refining access plans, analyzing material lifecycles, and establishing plans for routine maintenance.

Project Development Team, Local Engagement and Land Acquisition

Project Development Team and Local Engagement

Grain Belt Express added several members to the Project Development team in Q1 of 2023, including Sora Sunby (Analyst, Transmission Development) and Tyler Horvath (Senior Analyst, Transmission Development). The team continues to reach out to local and state stakeholders, as well as landowners along the route throughout the development process, to answer questions, and to continue to seek feedback about approaches the Project is taking in interfacing with landowners and other stakeholders. Additionally, in 2022 Grain Belt Express expanded its community relations program including support for local community causes. The Director of Local and Community Affairs and the community affairs consultant are routinely in contact with municipalities to address questions and discuss issues about the project.

Grain Belt Express has established and maintains memberships with Missouri chambers of commerce that serve areas where the project is located. In 2021, Grain Belt Express established a Community Grant program where nonprofit organizations in route counties in Kansas, Missouri, Illinois, and Indiana can apply for \$500 grants. To date, the program has approved applications and dispersed nearly 80 grant contributions, the majority to Missouri organizations. In 2022, Grain Belt Express representatives attended county fairs in each of the eight Missouri route counties and participated in livestock auctions, purchasing student projects from 4-H and FFA members and donating them back to the students.

In 2020, offices opened in St. Joseph and Moberly to serve as home bases for Project staff. Grain Belt Express also opened a local office in Dodge City, Kansas. Since March 2021, Grain Belt



Express has staffed these locations to support regular public office hours during the week to address landowner questions and concerns.

Since early 2020, Grain Belt Express has created and maintained several dozen state, county, and issue-specific fact sheets for use as informational hand-outs for local stakeholders, community leaders and landowners along the route. Physical copies of these documents are available in each of the Project's three local offices in Missouri and Kansas.

The following company announcements were issued related to Grain Belt Express in the last 12 months.

- Grain Belt Express Announces Expansion, Increases Energy Savings and Local Delivery (July 11, 2022)
- Grain Belt Express Files for Final State Approval in Illinois (July 27, 2022)
- Grain Belt Express Files to Bring More Power and Energy Savings to Missouri (August 25, 2022)
- Grain Belt Express selects Siemens Energy as HVDC technical partner (January 25, 2023)
- Grain Belt Express approved by Illinois Commerce Commission (March 8, 2023)
- Grain Belt Express files to bring economic benefits to Kansas sooner (March 13, 2023)

On July 11, 2022, Invenenergy Transmission held a press conference in St. Louis to announce a series of planned project enhancements in response to strong regional demand for access to affordable, reliable power. The announcement detailed a 25 percent expansion of the total line capacity from the original design of 4,000 megawatts, increasing to 5,000 megawatts.

Project land agents are the primary conduit for communications to landowners. Multiple times each month, Grain Belt Express land agents receive messaging training on common topics and questions that come up in conversations with landowners to equip them to provide accurate and up to date information about the project.

Land Acquisition

Invenenergy Transmission and Grain Belt Express continue to work with CLS, an industry-leading land services provider with a 35-year history of executing linear infrastructure projects throughout North America, including several multi-state transmission line projects to assist in its easement acquisition work. Its clientele includes many major utilities and independent power producers, and the land services provider has successfully negotiated land agreements for over 40,000 miles of rights-of-way.

To date, CLS has investigated property ownership, prepared and sent easement packages for all Kansas and Missouri parcels of land on which the Project will require an easement to construct



its facilities, hired and trained qualified land agents, and engaged with property owners with the aim of negotiating and securing voluntary easement agreements with all landowners. Over the past year the project has employed over 20 agents in support of the land effort. Land progress to date has included:

- Starting in June 2020, Grain Belt Express began mailing out easement packages to landowners in Missouri and began the same activity in Kansas in August.
- 100% of landowners across the route in Kansas and Missouri have received executable easements through the mail.
- To date, the Project has secured voluntary signed easements on approximately 81% of the route across both states.
- The Project has already made payments to landowners totaling over \$12 million in upfront easement signing payments on agreements representing over \$90 million in total contract value including future easement and structure payments.

Now that Grain Belt Express has received approval from regulators for its Primary Route in Illinois, land outreach activities in that state are beginning in Spring 2023.

Nearby Utility Facilities

Exhibit 206 to the CCN Order in Docket No. EA-2016-0358 requires Grain Belt Express to file "annual status updates" on discussions with Staff, a summary of the results of any additional studies, and any mitigation measures that have been implemented to address underground metallic structures, telecom facilities and AC lines. Mitigation measures indicated by future studies must be implemented within three (3) months of discovery that additional mitigation measures are needed, or as quickly as reasonably practical thereafter.

Invenergy Transmission's selected contractors and Invenergy Transmission have developed a detailed crossing matrix that tracks rights-of-way, utilities, roads and other infrastructure to be crossed by the route. The matrix is being updated throughout the design process to ensure that appropriate clearances and approvals are in place for the different types of crossings. Grain Belt Express has begun coordinating with the owners of nearby infrastructure to understand their physical, electrical, and operational requirements. Grain Belt Express has conducted a general pipeline interference screening study to assess impacts to nearby parallel and crossing utilities. Results of the interference study indicate Grain Belt Express does not pose an integrity risk to nearby pipelines during normal operation, and potential risks under fault conditions are being evaluated using the newly established practical screening criteria. While no mitigation measures are required at this stage of development, Grain Belt Express is committed to continued coordination with Staff and the owners of nearby facilities.



Please feel free to contact me with any additional questions. Thank you.

Sincerely,

/s/ Shashank Sane

Shashank Sane
Vice President, Invenergy Transmission LLC
On behalf of
Grain Belt Express LLC
ssane@invenergy.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 19th day of April, 2023.

/s/ Andrew O. Schulte
Attorney for Grain Belt Express LLC