

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-2014-0207
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

GRAIN BELT EXPRESS MOTION TO FILE LATE-FILED EXHIBIT

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”) moves that the attached Final Report of the MISO System Impact Study issued in November 2014 and discussed at the evidentiary hearing be admitted into evidence as Exhibit 150.

In support of its motion, the Company states:

1. Evidence in the record indicates that Grain Belt Express was awaiting the issuance of a system impact study by Midcontinent Independent System Operator, Inc. (“MISO”), as part of the Phase Two System Planning & Analysis Study Stage. See Ex. 112 at 4-5, 7 (A.W. Galli Add’l Direct Testimony). Dr. Galli as well as Staff’s Michael Stahlman testified at the evidentiary hearing that this MISO study was in the process of being completed or had been issued in draft form. See Tr. 678-81 (Galli); Tr. 1678-79 (Stahlman).

2. This Final Report became available to the Company last week and was provided on December 2, 2014 to Staff and other requesting parties in an amended response to Staff’s Data Request 129 regarding the MISO interconnection process and issues related to potential system upgrades. If this report had been available when surrebuttal testimony was filed or at the time of the evidentiary hearing, it would have been offered and admitted into evidence, just as the PJM System Impact Study issued in early October 2014 was attached as a schedule to the Surrebuttal Testimony of Dr. Galli. See Ex. 113, Sched. AWG-10 (Galli Surrebuttal).

3. Grain Belt Express offers this Final Report as late-filed Exhibit 150 to insure that the record in this proceeding is complete and that the Commission is apprised of the status of all RTO studies and related interconnection issues. Admitting this exhibit into evidence also fulfills the Company's acceptance of Staff's recommended condition that Grain Belt Express provide the Commission with all RTO studies related to the Project. See Ex. 201 at 20:18-26 (Beck Rebuttal); Ex. 113 at 5-6 (Galli Surrebuttal). See also Ex. 120 (Berry Surrebuttal), Sched. DAB-14 at 10 (Summary Exhibit of Staff Conditions and Company Positions).

WHEREFORE, Grain Belt Express moves that the attached Exhibit 150 be admitted into evidence as a late-filed exhibit.

/s/ Karl Zobrist

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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 4th day of December 2014.

/s/ Karl Zobrist
Attorney for Grain Belt Express Clean Line LLC