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) File No. EA-2014-0207 Current Transmission Line and an Associated) converter Station Providing an Interconnection on the) Maywood-Montgomery 245 kV Transmission Line.

MOTION TO INTERVENE OF INFINITY WIND POWER

)

Infinity Wind Power (Infinity or Movant), hereby moves the Public Service Commission of the State of Missouri (MPSC or Commission) for an Order granting Infinity intervenor status in the above-captioned matter. Movant files this Motion pursuant to 4 CSR 240-2.075, and the Commission's March 27, 2014 Order Directing Notice, Setting Intervention Deadline, and Directing Filing of Staff Recommendation. In support of its Motion, Movant states the following:

1. Infinity is a wind development company duly organized in the State of Delaware with its principal place of business in California, and projects located in the states of Missouri, Iowa, Minnesota, North Dakota, Nebraska, Kansas, Oklahoma, Texas, and New Mexico.

2. Applicant, Grain Belt Express Clean Line LLC (Grain Belt Express), is seeking from the Commission a Certificate of Convenience and Necessity authorizing it to construct, own, control, manage, and maintain a high voltage, direct current transmission line, the origin of which will be Western Kansas in an area being developed by Infinity.

As the wind developer in the area of origin for the Grain Belt Express project, 3. Infinity is the likely anchor-tenant for the project, and as such possesses an interest in this

1

proceeding that is different from any other intervenors and that interest could be adversely affected by a final order.

4. Infinity supports the Grain Belt Express project and asserts that its experience in developing and operating wind projects throughout the Midwest, as well as its understanding of the necessity for national grid expansion, could be valuable to the Commission's decision making process in this matter.

5. In addition to the undersigned counsel, all pleadings, notices, orders and other communications and correspondence regarding this proceeding should be directed to the following:

Matt Langley Infinity Wind Power 505 Montgomery Street, 10th Floor San Francisco, California 94111 <u>mlangley@infinitywind.com</u>

WHEREFORE, Infinity Wind Power respectfully requests the Commission grant this Motion, thereby permitting Infinity Wind Power to intervene in this proceeding.

Respectfully submitted,

<u>|s|Terri Pemberton</u>

Terri Pemberton (#60492) (785) 232-2123 Glenda Cafer (KS #13342) (785) 271-9991 CAFER PEMBERTON LLC 3321 SW 6th Avenue Topeka, Kansas Facsimile (785) 233-3040 terri@caferlaw.com glenda@caferlaw.com

ATTORNEYS FOR INFINITY WIND POWER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties to this proceeding by email or U.S. Mail, postage prepaid, this 24th day of April 2014.

<u>|s|Terri Pemberton</u>

Terri Pemberton Attorney for Infinity Wind Power