

In re: Union Electric Company's 2011)
Utility Resource Filing Pursuant to) **File No. EO-2011-0271**
4 CSR 240 – Chapter 22.)

COMES NOW Grain Belt Express Clean Line LLC (“Clean Line”), by its undersigned counsel, and pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure, applies to intervene herein and become a party for all purposes. In support of this application, Clean Line states as follows:

1. Clean Line is a limited liability company organized under the laws of the state of Delaware. Clean Line is a wholly owned subsidiary of Grain Belt Express Holding LLC, a Delaware limited liability company, which is a wholly owned subsidiary of Clean Line Energy Partners LLC (“Clean Line Energy Partners”), also a Delaware limited liability company. Clean Line’s principal offices are located at 1001 McKinney Street, Suite 700, Houston, Texas 77002.

2. The names and addresses of the people who should receive notices, orders, pleadings or other documents concerning this proceeding, in addition to the under-signed counsel, are:

1

and

Mark Lawlor
Clean Line Energy Partners LLC
16332 Neiman Road
Overland Park, KS 66062

3. Clean Line is in the business of constructing and operating high voltage transmission lines and associated facilities for the purpose of connecting the best renewable resources in the U.S. with load and population centers that have an increasing demand for electricity generated by renewable resources. Clean Line Energy Partners, through its wholly owned direct and indirect subsidiaries, has several high voltage transmission line projects under development in different regions of the U.S.

4. One of the projects under development by Clean Line Energy Partners is the Grain Belt Express Clean Line ("Grain Belt Express"), to be owned and operated by Clean Line. The Grain Belt Express will be a ± 500 or ± 600 kilovolt ("kV"), high voltage direct current ("HVDC") transmission line and associated facilities that will be capable of delivering 3,500 megawatts ("MW") of power from Kansas to load centers farther east. The transmission line will originate in western Kansas and will traverse east across the state into Missouri and, as currently planned, will interconnect with the AC grid at the St. Francois substation in southeastern Missouri. The Grain Belt Express will be approximately 550 miles in length and will deliver renewable energy to the Midwest ISO market. On March 7, 2011, Clean Line filed an application with the Kansas Corporation Commission ("KCC") requesting certification as a public utility in Kansas for purposes of constructing and operating the Grain Belt Express line.

Clean Line will also seek the appropriate regulatory approval from the Missouri Public Service Commission to build and operate the Grain Belt Express line in the State of Missouri.

5. Clean Line Energy Partners presently has three other major transmission projects underway in the United States. They are (1) the Rock Island Clean Line, a 500-mile, high voltage transmission line that will transport renewable energy from Iowa and South Dakota or Nebraska to load centers south of Chicago; (2) the Plains & Eastern Clean Line, an 800-mile, high voltage transmission line that will transmit renewable energy from the Oklahoma and Texas Panhandles, and potentially Kansas, to the Tennessee Valley Authority and the southeastern United States; and (3) the Centennial West Clean Line, an 800-mile, high voltage transmission line that will transport renewable energy from eastern New Mexico to Nevada and California.

6. The matters to be considered in this case and the Missouri Public Service Commission's ("Commission") determinations on those matters could have a direct and significant impact on Clean Line's operations. As a transmission company focused on renewable energy resources, Clean Line has an interest in making sure that renewable generation is properly considered in Ameren's IRP. In particular Clean Line wants to ensure that the IRP correctly reflects the declining costs and improving efficiency of wind turbines. Clean Line also believes that a complete IRP analysis must examine both in-state wind resources and out-of-state resources that may have higher capacity factors and lower costs. Properly capturing these factors is essential to the evaluation of alternatives, such as Clean Line's proposed project. Clean Line's interests are different from those of the general public and could be adversely affected by an order approving the 2011 IRP.

7. This application is timely filed in that it meets the Commission's Order requiring such applications be filed by March 15, 2011.

8. It will serve the public interest for the Commission to grant this application to intervene.

WHEREFORE, Clean Line respectfully requests the Commission grant its application to intervene for the reasons set forth above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Terri Pemberton", written over a horizontal line.

Glenda Cafer (Ks Bar #13342)

(785) 271-9991

Terri Pemberton (Mo Bar #60492)

(785) 232-2123

CAFER LAW OFFICE LLC

3321 SW 6th Avenue

Topeka, Kansas 66606

gcafer@sbcglobal.net

tjpemberton@sbcglobal.net

Attorneys for Grain Belt Express Clean Line LLC