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

Case No. EA-2014-0207

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Missouri Landowners Alliance First Set of Data Requests to Tradewind Energy, LLC

Definitions:

"Document" includes all of the items listed in Missouri Rule of Civil Procedure 58.01(a)(1).

"Grain Belt" means Grain Belt Express Clean Line LLC

"the proposed line" means the HVDC transmission line being proposed by Grain Belt in this case.

"RFI" is the Request for Information issued by Grain Belt on or about November 18, 2013 to prospective wind developers in the general vicinity of the western converter station of the proposed line.

Data Requests:

1.1 Please provide a copy of all documents, including emails, sent from Tradewind Energy to prospective purchasers of energy to be generated by Tradewind Energy and transmitted over the proposed line.

1.2 Please provide a copy of all documents, including emails, sent to Tradewind Energy from prospective purchasers of energy to be generated by Tradewind Energy and transmitted over the proposed line.

1.3 Other than any entity mentioned in documents responding to the preceding item, please list all entities with which Tradewind Energy has discussed the purchase or possible purchase of energy to be generated by Tradewind Energy and transmitted over the proposed line. In addition, please provide the date(s) on which such discussions were held.

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1.4 In your response to the RFI, please describe in detail how you calculated the Annual Capacity Factor provided in Part A of the RFI form.

1.5 In your response to the RFI, please describe in detail how you calculated the "average wind speed for the Project Site" in Part C of the RFI form.

1.6 Please state whether you provided a figure for "Pricing at Project's busbar" in Part D of the RFI form.

1.7 If the answer to the preceding item is yes, please list all cost components which you included in that figure, and state whether the figure you provided included any amount for a profit margin above the costs of production.

1.8 Please state whether your response to the RFI was intended to indicate your willingness to sell energy for 25 years for the amount you listed as your "Pricing at Project's busbar", without conditioning such a contract on the continued availability of the Production Tax Credit for at least some of those years.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served upon the parties to this case by email or U.S. Mail, postage prepaid, this 6th day of September, 2014.

<u>/s/ Paul A. Agathen</u> Paul A. Agathen Attorney for the Missouri Landowners Alliance Paa0408@aol.com (636)980-6403