

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 )

**TRADEWIND ENERGY, INC'S STATEMENT OF POSITION**

TradeWind Energy, Inc. ("TradeWind"), for its statement of position in this matter on the issues identified in the List of Issues and Witnesses filed on October 27, 2014, states as follows:

- 1. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt Express Clean Line LLC ("Grain Belt Express") is seeking a certificate of convenience and necessity ("CCN") are necessary or convenient for the public service?**

TradeWind supports the proposed Grain Belt Express transmission line because there is a need for it, Grain Belt Express is qualified to provide the transmission of wind energy through its proposed line and converter station, and the growth of wind energy is in the best interests of the public. Wind energy has the potential to deliver low cost clean renewable electricity to customers in the Great Plain's region, including Missouri, and electric energy customers in other regions of the United States. The proposed Grain Belt Express transmission line provides an alternative means to transport wind energy from robust wind areas to new markets where low cost clean wind energy options are significantly less viable and do not presently exist. The line addresses the existing capacity limitation on the transportation of wind energy, and permits the transportation of wind energy outside the Southwest Power Pool Regional Transmission Organization ("SPP RTO") region. The proposed Grain Belt Express transmission line will produce benefits to Missouri because the converter station will allow low cost energy to be

delivered to Missouri. Moreover, the transmission line will address existing technology and congestion issues present within the existing SPP RTO system, promote competition in the marketplace, and accommodate future growth into new markets.

**2. If the Commission grants the CCN, what conditions, if any, should the Commission impose?**

For the reasons set forth in response to Issue Number 1, no conditions should be imposed by the Commission upon Grain Belt Express.

**3. If the Commission grants the CCN, should the Commission exempt Grain Belt Express from complying with the reporting requirements of Commission Rules 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?**

TradeWind takes no position on this issue.

Dated: November 7, 2014

Respectfully Submitted,

DOUTHIT FRETS ROUSE GENTILE &  
RHODES, LLC

By: /s/ Christopher L. Kurtz, Esq.

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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 7<sup>th</sup> day of November 2014.

/s/ Christopher L. Kurtz, Esq.  
Christopher L. Kurtz