

**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)

MISSOURI FARM BUREAU FEDERATION’S STATEMENT OF POSITIONS

COMES NOW the Missouri Farm Bureau Federation (Farm Bureau), and for its
Statement of Positions in this case, states as follows:

POSITIONS

- 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?***

No. Farm Bureau’s position is that Grain Belt Express Clean Line LLC (Grain Belt Express) is a consortium of private investors. It is a business venture that does not merit certification by the Missouri Public Service Commission because it is a private business serving purely private interests. Neither its purpose nor potential benefits to Missouri citizens enumerated by Grain Belt Express justify the authorization to exercise eminent domain power. Moreover, the potential benefits are outweighed by the concerns expressed by many of Farm Bureau’s members along with hundreds of others who participated in the Commission’s local public hearings and submitted comments in opposition to the project.

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

For the reason set out in its response to Issue 1 above, Farm Bureau not believe that the Commission should grant a CCN to Grain Belt Express. However, if the Commission does grant a CCN, Farm Bureau believes that the CCN should contain a condition prohibiting Grain Belt Express from exercising eminent domain for the project.

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)?*

At this point prior to the evidentiary hearing, Farm Bureau takes no position on this issue. However, Show Me reserves the right to take a position after hearing and considering all of the evidence.

Respectfully submitted,

HEALY & HEALY,
ATTORNEYS AT LAW, LLC



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 7th day of November, 2014.

A handwritten signature in black ink that reads "Terry M. Jarrett". The signature is written in a cursive style with a horizontal line extending from the start of the name.

Terry M. Jarrett