

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Grain )  
Belt Express, LLC for a Siting Permit for the )  
Construction of Two 345 kV Transmission ) Docket 24-GBEE-790-STG  
Lines and Associated Facilities through )  
Gray, Meade, and Ford Counties, Kansas. )

**PETITION FOR INTERVENTION**

COME NOW, (1) ENGIE Renewables NA LLC (“**ENGIE**”), (2) Iron Star Wind Project, LLC (“**Iron Star**”), (3) Horse Thief Wind Project, LLC (“**Horse Thief**”), (4) Santa Fe Wind Project, LLC (“**Santa Fe**”) and (5) Midway Wind Project, LLC (“**Midway**”) and respectfully Petition the State Corporation Commission of the State of the Kansas (“**Commission**” or “**KCC**”) pursuant to K.S.A. 77-521(a) and K.A.R. 82-1-225 for Intervention of ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway in the above captioned KCC Docket.

In support of its Petition, ENGIE, Iron Horse, Horse Thief, Santa Fe, and Midway state and allege as follows:

1. Grain Belt Express filed its Application in this Docket on May 31, 2024.
2. Grain belt provided Notice to Iron Star of this KCC Docket by letter dated June 14, 2024.
3. The Grain Belt Application stated in part as follows:

“Grain Belt Express LLC (“**Grain Belt Express**” or “**Applicant**”),<sup>1</sup> by its undersigned counsel, hereby files this Application pursuant to K.S.A. 66-1,777, et seq., requesting that the State Corporation Commission of the State of Kansas (“**Commission**”) issue a siting permit establishing the route for two inter-related transmission lines and associated facilities as part of the previously approved “**AC Collector System**.” This includes: (1) a double-circuit 345 kV alternating current (“**AC**”) transmission line of approximately 46 miles in length across portions of

Gray, Meade, and Ford Counties (the “Meade-Dodge City Line”), potentially including future switchyards at the Meade-Dodge City Line origination point; and (2) a single or double-circuit 345 kV AC transmission line of approximately 16 miles in length traversing a portion of Ford County (the “Bucklin-Dodge City Line”), potentially including future switchyards at the Bucklin origination point.”

4. Under K.A.R. 82-1-225, the Commission shall grant intervention if the petition:
- (1) is submitted in writing and properly served; (2) states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and
  - (3) that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. The Commission has discretion to grant intervention at any time where intervention is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

**Entities Seeking Intervention In This KCC Docket.**

**ENGIE**

5. ENGIE is a developer, owner, and operator of renewable energy projects in the United States, including at several locations in southwest Kansas.

6. ENGIE is an indirect parent company of Iron Star Wind Project, LLC, the owner of the Iron Star wind project located in Ford County.

7. ENGIE is also the indirect parent of Horse Thief, Santa Fe and Midway. All of such projects are located in southwest Kansas in close proximity to the Grain Belt transmission line and its proposed AC Collector System.

## **Iron Star**

8. Iron Star operates a 297.6-megawatt (MW) wind farm located in Ford County, KS, south of Dodge City. The Iron Star - Ford County wind farm was placed into commercial operation in December 2021 and consists of 62 wind turbines, each with a capacity of 4.8 MW. These Iron Star turbines are connected via underground collection lines to a common collection substation, and then linked to the ITC Great Plain's Saddle Substation via a 5-mile 345 kilovolt (kV) transmission line.

9. Additionally, Iron Star owns lands located in Ford County, including its operations building.

10. The Iron Star – Ford County Wind Farm is located immediately west of the proposed Grain Belt Express High Voltage Direct Current (HVDC) Converter Station. The Grain Belt transmission line is a potential market outlet for electric energy produced at the Iron Star project. Access of electric energy from the Iron Star project to the Grain Belt converter station is dependent on the following: (i) reasonable siting of the proposed AC Collector Lines, to accommodate landowner interests and also to accommodate the interests of currently operating and future renewable energy projects in southwest Kansas (ii) nondiscriminatory access to the Grain Belt AC Collector Lines on terms and conditions and rates or charges that are fair, just, and reasonable, and / or (iii) access to land rights that permit Iron Star to construct and operate its own collector lines to deliver electric energy to the Grain Belt Converter Station.

11. Grain Belt's proposed infrastructure, as depicted on publicly available maps, intersects with existing infrastructure that is critical to the operation of the Iron Star – Ford County Wind Farm, at several locations.

12. Specifically, Grain Belt's proposed AC Collector Line: (i) intersects the above described 345kV transmission line at one (1) location and (ii) intersects Iron Star's underground collection lines at five (5) locations. The financial and operational impacts related to the described intersects may include, but are not limited to: (i) downtime at the Iron Star wind farm during construction activities of Grain Belt, (ii) financial and operational impacts related to the required coordination of safety protocols during the installation of Grain Belt's facilities near buried collection lines, and (iii) the financial and operational impacts related to the required coordination of construction traffic during the installation of Grain Belt's infrastructure.

**Horse Thief**

13. Horse Thief is the owner of the interconnection, land and development rights associated with the proposed Horse Thief wind project, currently in development in Finney and Gray Counties, Kansas. The Grain Belt Express transmission line is a potential market outlet for electric energy produced at the Horse Thief project. Access of electric energy from the Horse Thief project to the Grain Belt converter station is dependent on the following: (i) reasonable siting of the proposed AC Collector Lines, to accommodate landowner interests and also to accommodate the interests of currently operating and future renewable energy projects in southwest Kansas (ii) nondiscriminatory access to the Grain Belt AC Collector Lines on terms and conditions and rates or charges that are fair, just, and reasonable, and / or (iii) access to land rights that permit Iron Star to construct and operate its own collector lines to deliver electric energy to the Grain Belt Converter Station.

**Santa Fe**

14. Santa Fe is the owner of the interconnection, land and development rights associated with the proposed Santa Fe wind and solar projects currently in development in Ford,

Hodgeman and Gray Counties, Kansas. The Grain Belt Express transmission line is a potential market outlet for electric energy produced at the Santa Fe project. Access of electric energy from the Santa Fe project to the Grain Belt converter station is dependent on the following: (i) reasonable siting of the proposed AC Collector Lines, to accommodate landowner interests and also to accommodate the interests of currently operating and future renewable energy projects in southwest Kansas (ii) nondiscriminatory access to the Grain Belt AC Collector Lines on terms and conditions and rates or charges that are fair, just, and reasonable, and / or (iii) access to land rights that permit Iron Star to construct and operate its own collector lines to deliver electric energy to the Grain Belt Converter Station.

**Midway**

15. Midway is the owner of the interconnection, land and development rights associated with the proposed Midway wind and solar projects currently in development in Hodgeman, Ford, and Edwards Counties, Kansas. The Grain Belt Express transmission line is a potential market outlet for electric energy produced at the Santa Fe project. Access of electric energy from the Midway project to the Grain Belt converter station is dependent on the following: (i) reasonable siting of the proposed AC Collector Lines, to accommodate landowner interests and also to accommodate the interests of currently operating and future renewable energy projects in southwest Kansas (ii) nondiscriminatory access to the Grain Belt AC Collector Lines on terms and conditions and rates or charges that are fair, just, and reasonable, and / or (iii) access to land rights that permit Iron Star to construct and operate its own collector lines to deliver electric energy to the Grain Belt Converter Station.

16. Any Commission approval of siting for the proposed AC Collector Lines of Grain Belt in this Docket should not only consider siting that is preferred by Grain Belt for the

collection of renewable energy for Grain Belt, but also siting that respects and accommodates the rights of existing wind and other renewable energy facilities located, and in development in Southwest Kansas – including Iron Star – to continue their operations and/or development with as little adverse financial and operational impacts as are reasonable.

17. Upon further discussion with Grain Belt and the Parties to this Docket, and upon discovery herein, alternate siting of the AC Collector Lines from the siting presented by Grain Belt, may yield a more just and reasonable siting for the AC Collector Lines that better accommodates Grain Belt’s interests, landowner interests, and the interests of the existing and future renewable energy projects in Southwest Kansas – including the interests of ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway.

18. ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway have direct financial and / or operational interests in this Docket as set forth herein, and as such, are entitled under applicable Kansas law to an Order of Intervention herein. ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway have stated facts demonstrating that their legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding.

19. ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway do not seek any amendment to the Procedural Schedule in this Docket.

WHEREFORE, ENGIE, Iron Star, Santa Fe, Horse Thief and Midway respectfully request that the Commission issue an Order granting its Petition to Intervene in this matter and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

/s/ James P. Zakoura

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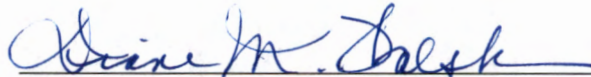
**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF JOHNSON    )

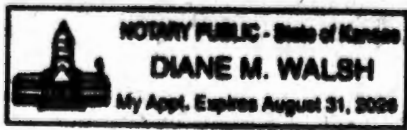
James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway, that he has read and is familiar with the foregoing *Petition for Intervention*, and that the statements therein are true to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
James P. Zakoura

SUBSCRIBED AND SWORN to before me this 15th day of July 2024.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:





## CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of July, 2024, the foregoing *Petition for Intervention* was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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