

**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 No. 24-GBEE-____-STG
Lines and Associated Facilities through)
Gray, Meade, and Ford Counties, Kansas.)

APPLICATION FOR TRANSMISSION LINE SITING PERMITS

Grain Belt Express LLC (“Grain Belt Express” or “Applicant”),¹ 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-circuit² 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 switchyards³ at the Meade-Dodge City Line origination point; and (2) a single or double-circuit 345 kV AC

¹ Grain Belt Express LLC previously operated under the name Grain Belt Express Clean Line LLC. The name change from Grain Belt Express Clean Line LLC to Grain Belt Express LLC was approved by the Commission in Docket No. Docket No. 20-GBEE-501-CCN. References herein to “Grain Belt Express” refer to the singular entity, whether before or after its name change.

² The Meade-Dodge City Line is currently planned as a double circuit transmission line, but further refinements to the AC Collector Lines design and engineering may occur. Grain Belt Express will update the Commission throughout this proceeding regarding significant design and engineering modifications.

³ The Meade Line and the Bucklin Line have been sited and designed to be in proximity to renewable energy projects under development that have applied to the queue, and both transmission lines will be open to interconnection requests at those points. Initially, Grain Belt Express will maintain metering infrastructure at the origination points of the transmission lines. As projects interconnect, Grain Belt Express will construct AC interconnection facilities as needed. For ease of reference, the term “switchyard” is used throughout the Application materials to mean possible interconnection facilities that could include switchyards, substations, and/or metering equipment. Because there are already multiple renewable energy projects seeking interconnection in the vicinity of Meade-Dodge City, Grain Belt Express will begin pursuing voluntary agreement for a switchyard location along the proposed route following the filing of this Application.

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. Together, Grain Belt Express may refer to these lines together as the “AC Collector Lines”, which make up a portion of the AC Collector System.⁴ In support of its request for transmission line siting authority, Grain Belt Express submits the following:

I. OVERVIEW OF APPLICATION AND SUPPORTING TESTIMONY

1. This Application and the supporting testimony are submitted to the Commission in compliance with the Transmission Line Siting Act, K.S.A. 66-1,177 *et seq.* (“Line Siting Act”). As required by the Line Siting Act, this Application and the supporting testimony demonstrates “the necessity for and the reasonableness of the location of” the AC Collector Lines.⁵ The necessity of the AC Collector Lines is demonstrated through a review of previous Commission findings regarding the necessity for the Grain Belt Express Project⁶ as a whole, as well as new evidence, submitted as part of this case, that demonstrates the Grain Belt Express Project continues to be necessary and the AC Collector Lines constitute a component of the Project approved by the Commission. The reasonableness of the location of the AC Collector Lines is demonstrated through a comprehensive and industry-leading Routing Study, as well as Grain Belt Express’ extensive efforts to receive and incorporate feedback from affected stakeholders, including landowners.

2. The Line Siting Act also instructs the Commission to consider “the benefit to both consumers in Kansas and consumers outside the state and economic development benefits in

⁴ See, *infra*, for additional discussion of the “AC Collector System.”

⁵ K.S.A. 66-1,180.

⁶ The “Grain Belt Express Project” is further defined below.

Kansas.”⁷ Accordingly, this Application and the supporting testimony provide evidence regarding such benefits, as related to the Grain Belt Express Project and the contribution of the AC Collector Lines that are the subject of this proceeding.

3. Support for this Application is provided in the direct testimony of the following Grain Belt Express witnesses, filed contemporaneously herewith:

Witness	Issues
Kevin Chandler	<ul style="list-style-type: none"> • Description of Grain Belt Express • Overview of the AC Collector Lines • Relevant Commission Findings in prior proceedings • Project Need • Economic Benefits of the AC Collector Lines
David Gelder	<ul style="list-style-type: none"> • AC Collector Line Description • Engineering and Construction Details • Route Selection • Point of Interconnections-ITC Saddle Substation • Right-of-Way Description • Anticipated Schedule
Jamie Precht	<ul style="list-style-type: none"> • Route Selection process • Environmental assessment and routing considerations • State Agency outreach
Brad Fine	<ul style="list-style-type: none"> • Grain Belt Express approach to landowner interactions, easement acquisition, and crop compensation
Emily Hyland	<ul style="list-style-type: none"> • Public outreach for public meetings • Landowner-specific outreach and notifications • County, and Local Agency outreach

4. In addition to undersigned counsel, pleadings, notices, orders, and other correspondence concerning this Application should be addressed to:

Nicole Luckey
 Senior Vice President
 Grain Belt Express LLC
 One South Wacker Drive, Suite 1800
 Chicago, IL 60606
nluckey@invenergy.com

Brad Pnazek
 Vice President, Transmission Business
 Development
 Grain Belt Express LLC
 One South Wacker Drive, Suite 1800
 Chicago, IL 60606
bpnazek@invenergy.com

⁷ K.S.A. 66-1,180.

Kevin Chandler
Director, Transmission Business
Development
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
kchandler@invenenergy.com

II. **RELEVANT HISTORICAL BACKGROUND OF THE GRAIN BELT EXPRESS PROJECT**

5. On March 7, 2011, Grain Belt Express filed an application with the Commission requesting a Certificate of Convenience and Necessity (“CCN”)⁸ to transact business as a transmission-only public utility in Kansas and to construct, own, operate, and maintain an overhead, multi-terminal ±600 kilovolt (“kV”) high voltage direct current (“HVDC”) transmission line and associated facilities, including a converter station, an AC switchyard and alternating current collector lines (the “Grain Belt Express Project” or “Project”).

6. The Project is an interregional transmission project that will connect four balancing authorities: Southwest Power Pool, Inc. (“SPP”), Midcontinent Independent System Operator, Inc. (“MISO”), Associated Electric Cooperative Incorporated (“AECI”) and PJM Interconnection, LLC (“PJM”). The Project is designed to facilitate the development and export of this low-cost wind to load and population centers in Missouri, Illinois, Indiana, and states farther east, without burdening Kansas retail electric customers with the capital costs of transmission.

7. The Commission granted a CCN for the Project on December 7, 2011 pursuant to its *Order Approving Stipulation and Agreement and Granting Certificate*.

⁸ See generally Docket No. 11-GBEE-624-COC, *Application* (Mar. 7, 2011).

8. On July 15, 2013, in Docket No. 13-GBEE-803-MIS, Grain Belt Express filed an application for a siting permit for the HVDC portion of the Project in Kansas, which was granted by the Commission on November 7, 2013.

9. On January 28, 2020, Grain Belt Express was acquired from Clean Line Energy Partners LLC (“Clean Line”) by Invenenergy Transmission LLC (“Invenenergy Transmission”). The Commission granted prior approval of the transaction pursuant to its *Order on Unanimous Settlement Agreement*, issued on June 18, 2019 in Docket No. 19-GBEE-253-ACQ (the “Acquisition Docket”).

10. On March 10, 2023, Grain Belt Express filed a *Motion to Amend the Unanimous Settlement Agreement* in the Acquisition Docket, which sought limited modifications to the Unanimous Settlement Agreement previously filed in the Acquisition Docket. The limited modifications to the Unanimous Settlement Agreement were necessary to allow Grain Belt Express to construct the Project in two phases.⁹

11. Phase 1 consists of (1) a converter station and associated facilities in Ford County, Kansas, (2) an HVDC transmission line between the Kansas converter station and the converter station in Missouri, and (3) a converter station in Monroe County, Missouri and (4) AC facilities connecting such Missouri converter station to points of delivery in Missouri.¹² Phase 2 will consist of (1) additional component buildout at the Ford County, KS converter station, (2) an HVDC transmission line beginning at the converter station in Monroe County, Missouri and then traversing east through Missouri and Illinois to a converter station in Clark County, Illinois, (3)

⁹ Docket No. 19-GBEE-253-ACQ, Testimony of Shashank Sane in support of *Motion to Amend Unanimous Settlement Agreement*, March 10, 2023 at pp. 7-8.

the Clark County, Illinois converter station and AC facilities connecting such Illinois converter station to a point of interconnect in Indiana.¹⁰

12. In the Commission's *Order Granting Motion to Amend the Unanimous Settlement Agreement*, the Commission found that constructing the Project in two phases results in no material changes to the Kansas portion of the Project that would cause the Commission to revisit its earlier approval of Grain Belt Express' CCN.¹¹ The Commission also found that constructing the Project in two phases will allow the Project's benefits to accrue to Kansas much earlier than if the Project was not constructed in two phases.¹²

13. Grain Belt Express has made significant progress on the development of the Project since it was acquired by Invenenergy Transmission in 2020. In summary, Grain Belt Express has achieved the following milestones:

- Acquired over 97% of all easements required for the Phase 1 HVDC route, including over 98% of all easements required in Kansas. Satisfied, ahead of schedule, Kansas Corporation Commission's established deadlines for easement acquisitions as a condition of retaining siting authority in Kansas.¹³
- Achieved approvals from the Indiana Utility Regulatory Commission to authorize Invenenergy Transmission to acquire, own, and operate the Project in Indiana.¹⁴

¹⁰ *Id.* at p. 9.

¹¹ Docket No. 19-GBEE-253-ACQ, *Order Granting Motion to Amend the Unanimous Settlement Agreement*, ¶ 11 (June 13, 2023).

¹² *Id.*

¹³ Docket No. 13-GBEE-803-MIS, *Order Granting Joint Motion to Replace Sunset Provisions with Settlement Deadlines*, ¶ 11 (September 26, 2019).

¹⁴ IURC Cause No. 45294, *Order from the Commission* (Jan. 2, 2020).

- Received a certificate of public convenience and necessity (“CPCN”) from the Illinois Commerce Commission (“ICC”) on March 8, 2023.
- Worked in cooperation with various agricultural and landowner groups culminating in the enactment of Missouri House Bill 2005.¹⁵
- Received approval from the Missouri Public Service Commission¹⁶ to amend its certificate of convenience and necessity to (1) construct the Project in two phases; (2) to relocate the Missouri converter station from Ralls County to Monroe County and to increase the capacity of the converter station from 500 MW to 2,5000 MW; and (3) to relocate the AC Connector Line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.

III. DESCRIPTION OF INVENERGY AND GRAIN BELT EXPRESS

14. Grain Belt Express is a limited liability company organized under the laws of the State of Indiana. Grain Belt Express was formed in 2010 as a Delaware LLC and converted to an Indiana LLC in 2013. Grain Belt Express’ principal offices are located at One South Wacker Drive, Suite 1800, Chicago, IL 60606.

15. Grain Belt Express is a wholly owned subsidiary of Invenergy Transmission, a Delaware limited liability company, which is a wholly owned subsidiary of Invenergy Renewables LLC (“Invenergy Renewables”), also a Delaware limited liability company. Invenergy Transmission is an affiliate company of Invenergy LLC, which is an Illinois limited liability company.

¹⁵ Available at <https://house.mo.gov/billtracking/bills221/hlrbillspdf/3627S.07T.pdf>.

¹⁶ File No. EA-2023-0017, October 12, 2023 Report and Order.

16. Invenergy Renewables, directly and through its affiliated companies, has successfully developed over 4,100 miles of transmission and distribution line infrastructure, including 88 substations, 96 generator step-up transformers, and over 5,000 pad mount transformers over the past approximately 20 years. Invenergy Renewables and its affiliated companies have successfully developed more than 200 large-scale clean power projects in the United States and globally, totaling over 31,000 megawatts of projects in operation, construction or contracted, including wind, solar, natural gas power generation and advanced energy storage projects. Construction of these projects avoided 66 million tons of CO₂ emissions, equivalent to 13 million gasoline-powered cars off the road and represent \$59 billion in completed transactions.

IV. STATUTORY AND REGULATORY REQUIREMENTS FOR TRANSMISSION LINE SITING

17. As discussed above, Grain Belt Express holds a CCN from this Commission to construct the Project, including the AC Collector System. In granting the CCN, the Commission approved of and adopted the terms of a *Stipulation & Agreement* among Grain Belt, the Commission Staff, the Citizens Utility Ratepayer Board (“CURB”) and Energy for Generations, LLC. One of the terms in the *Stipulation & Agreement* states:

[Grain Belt Express] should be granted a Transmission Only Certificate of Public Convenience and Necessity pursuant to K.S.A. 66-131, to operate as a public utility in Kansas and construct and operate a HVDC transmission line, and associated facilities as contemplated by its Application, including converter stations, lines to connect the converter stations to the SPP, and an AC Collector System comprised of AC gathering lines needed to connect generators in western Kansas.¹⁷

Another term in the *Stipulation & Agreement* states:

The certificate should clearly include authority to construct and operate the AC Collector System, without [Grain Belt Express] having to seek further certification, or amendments to the certificate, in order to construct or operate the

¹⁷ Docket No. 11-GBEE-624-COC, *Order Approving Stipulation & Agreement and Granting Certificate*, Attachment A (*Stipulation & Agreement*) at p. 3.

AC Collector System or the Project. [Grain Belt Express] shall make all filings under the Kansas Transmission Line Siting Act (Kansas Siting Act), K.S.A. 66-1,177 *et seq.*, and the Wire Stringing Rules, K.A.R. 82-12-1 *et seq.*¹⁸

18. The current transmission line siting application is for two inter-related AC Collector Lines that will form a portion of the AC Collector System for the Project.

19. Both the terms of the *Stipulation & Agreement* and the Line Siting Act require Grain Belt Express to file an application for siting authority to build the AC Collector System. Pursuant to K.S.A. 66-1,178(a), an electric utility must acquire a siting permit from the Commission prior to preparation for construction of an electric transmission line or any exercise of eminent domain to acquire any interest in land in connection with the site preparation for construction of any such line. K.S.A. 66-1,178 requires that an application for siting authority specify (1) the proposed location of the line;¹⁹ (2) the names and addresses of those landowners of record whose land or interest is proposed to be acquired in connection with the construction of or is located within 660 feet of the center line of the easement where the line is proposed to be located;²⁰ and (3) such other information as may be required by the Commission.

20. Pursuant to K.S.A. 66-1,178(b), the Commission must “determine the necessity for and the reasonableness of the location of the proposed electric transmission line.” Once an application for a siting permit is filed, the Commission must issue a final order on the application

¹⁸ *Id.*

¹⁹ Discussed in the Direct Testimony of Jamie Precht and exhibits thereto. The location of the AC Collector Lines are illustrated and described in Exhibits JP-3 – JP-6.

²⁰ A list of the names and addresses of those landowners of record whose land or interest is proposed to be acquired in connection with the construction of or which are located within 1000 feet of the centerline of the Bucklin Line Proposed Route and Meade Line Propose Route is proposed to be located is attached hereto as Exhibits EH-3 and EH-4 to the Direct Testimony of Emily Hyland. Grain Belt Express elected to use a landowner notification boundary of 1000 feet from the centerline of the Bucklin Line Proposed Route and Meade Line Propose Route in order to ensure that all potentially impacted landowners received notice if potential micro-siting modifications to the placement of the line are required.

within 120 days.²¹ When making such determinations, the Commission must take “into consideration the benefit to both consumers in Kansas and consumers outside the state and economic development benefits in Kansas.”

21. To determine “the necessity for ... the proposed electric transmission line,” the Commission historically has applied standards similar to those applied in a CCN proceeding. As in CCN proceedings, the Commission term “necessity” does not require a finding of absolute need, but rather a finding of public need without which the public is inconvenienced to the point of being handicapped.²² The Commission has previously stated that “the broad overriding factor it must consider in determining necessity of a proposed electric transmission line is whether the facility promotes the public interest.”²³

22. The Commission also considers the economic impact on Kansas, including construction jobs, taxes, and landowner payments for easements.²⁴ The Commission has also placed a high value on a “robust transmission infrastructure [that] supports economic growth and development” over the long term.²⁵

23. As for the “reasonableness of the location of the proposed electric transmission line,” the Commission has historically considered the reasonableness and robustness of the routing study. In previous siting dockets, the Commission has deemed routing studies to be reasonable when the objective is to “minimize the overall effect of the line on natural and human environments

²¹ K.S.A. 66-1,178(d).

²² Docket No. 09-ITCE-729-MIS, *Order Granting Siting Permit*, ¶ 39 (July 13, 2009).

²³ *Id.*; see also, Docket No. 13-ITCE-677-MIS, *Amended Order Granting Siting Permit*, ¶ 21 (Sept. 17, 2013); Docket No. 13-GBEE-803-MIS, *Order Granting Siting Permit*, ¶ 20 (Nov. 7, 2013).

²⁴ Docket No. 13-ITCE-677-MIS, *Amended Order Granting Siting Permit*, ¶ 25 (Sept. 17, 2013); Docket No. 13-GBEE-803-MIS, ¶¶ 22-23 (Nov. 7, 2013).

²⁵ Docket No. 13-ITCE-677-MIS, *Amended Order Granting Siting Permit*, ¶ 26 (Sept. 17, 2013).

while avoiding unreasonable and circuitous routes and unreasonable costs.”²⁶ More recently, the Commission has stated that “the Commission’s analysis of the reasonableness of the location of the line turns on how the route was selected and whether the final outcome is reasonable.”²⁷ The Commission has also clarified that a “determination that the route was reasonable does not necessitate a finding that it was the sole acceptable option. More than one route may be reasonable just as more than one method to select the route may be reasonable.”²⁸

24. In evaluating a line siting application, the Commission also has previously considered the adequacy of the notice provided to landowners and the opportunity of landowners to have input on the location of the line on their property.²⁹ The Commission typically analyzes specific route alternatives proposed by landowners, balancing the costs of the reroute against the benefits gained by choosing the alternative route and the harm avoided by moving the filed or proposed route.³⁰ Further, the Commission has granted public utilities the authority to engage in micro-siting and has encouraged companies to continue to work with landowners and incorporate their reasonable preferences for line siting as much as practicable.³¹ Grain Belt Express is committed to working with landowners to assess requests for micro-siting and minor reroutes to the extent practicable.

²⁶ Docket No. 13-GBEE-803-MIS, *Order Granting Siting Permit*, ¶ 40 (Nov. 7, 2013); *see also*, Docket No. 09-ITCE-729-MIS, *Order Granting Siting Permit*, ¶ 49 (July 13, 2009); Docket No. 13-ITCE-677-MIS, *Amended Order Granting Siting Permit*, ¶ 29 (Sept. 17, 2013).

²⁷ Docket No. 23-NETE-585-STG, *Order on Siting Application*, ¶ 20.

²⁸ *Id.*

²⁹ Docket No. 11-ITCE-644-MIS, *Order Granting Siting Permit*, ¶¶ 62-63 (July 12, 2011); Docket No. 13-ITCE-677-MIS, *Amended Order Granting Siting Permit*, ¶ 30 (Sept. 17, 2013).

³⁰ Docket No. 13-ITCE-677-MIS, *Order Granting Siting Permit*, ¶ 37 (Sept. 17, 2013).

³¹ Docket No. 23-NETE-585-STG, *Order on Siting Application*, ¶ 50.

V. NECESSITY FOR THE AC COLLECTOR LINES

25. This proceeding pertains to the siting of two inter-related AC Collector Lines, Meade-Dodge City and Bucklin-Dodge City, that are necessary to gather output from Kansas wind generation to bring to markets farther east. The Meade-Dodge City Line will initially interconnect approximately 1,200+ MW and will originate in the southwest region of the Meade Line Study Area,³² terminating at the Ford County HVDC converter station. The Meade-Dodge City Line will serve as a delivery node for renewable energy projects interconnecting from this region. The Bucklin-Dodge City Line will initially interconnect approximately 600+ MW and will originate in the southeast region of the Bucklin Line Study Area,³³ terminating at the Ford County HVDC converter station.

26. Grain Belt Express is requesting siting authority for both the Meade-Dodge City Line and the Bucklin-Dodge City Line in a single Application for engineering efficiency, administrative efficiency, and transparency. Grain Belt Express discussed filing a single Application for the two AC Collector Lines with Commission Staff in advance and has coordinated with the Commission's Office of Public Affairs and Consumer Protection ("PACP") regarding coordination of local public hearings for each of the Lines. The two AC Collector Lines share a common end point (the AC switchyard on the Ford County HVDC converter station property), and the routes were developed in tandem by the routing team.

³² As described more specifically in Section 1.1 of the Routing Study, the Meade Line Study Area is roughly bounded by the U.S. Highway 56 and Saddle Road to the north, U.S. Highway 54 and the Meade and Ford County boundary to the south, two existing 345kV transmission lines to the east, and State Road 23 to the west.

³³ As described more specifically in Section 1.1 of the Routing Study, the Bucklin Line Study Area is roughly bounded by the Arkansas River to the north, the town of Bucklin to the southeast and U.S. Highway 54 to the south.

27. In Grain Belt Express' CCN proceeding,³⁴ the Commission discussed the need for long-distance, multi-state transmission projects such as the Grain Belt Express Project and expressly found that the Grain Belt Express Project will promote the development of renewable energy.³⁵ The Commission further noted that the construction of the Project in Kansas will provide economic benefits to local communities, including: construction of renewable energy generation facilities that could not otherwise be built due to insufficient transmission; construction and permanent maintenance jobs; growth of turbine and related manufacturing employment; tax revenues for state and local governments in Kansas; and royalties to Kansas landowners.³⁶

28. The Commission has further found that the public interest is promoted by the Project, as it provides the opportunity for renewable energy resources to be further developed in Kansas, which is vital to economic growth in the state.³⁷ The Project "promotes both Kansas' wind energy resources and introduces diversity in the transmission line system with the construction of its HVDC transmission lines and AC Collector System."³⁸

29. As noted by Grain Belt Express witness Michael Skelly in the CCN proceeding, the Project includes an HVDC transmission line and associated facilities that will originate in western Kansas. The facilities include gathering lines, a series of high voltage AC lines that will deliver energy from wind farms to the Grain Belt Express converter station near Spearville.³⁹ Mr. Skelly also noted that "the primary objective of the Grain Belt Express project is to bring electricity

³⁴ Docket No. 11-GBEE-624-COC.

³⁵ Docket No. 11-GBEE-624-COC, *Order Approving Stipulation and Agreement and Granting Certificate*, December 7, 2011 (hereafter, the "CCN Order"), at ¶50.

³⁶ *Id.* ¶¶51-52.

³⁷ *Id.* ¶53.

³⁸ *Id.* ¶ 53.

³⁹ Docket No. 11-GBEE-624-COC, *Direct Testimony of Michael Peter Skelly*, p. 5 (Mar. 7, 2011).

produced by wind generation facilities in wind-rich areas of western Kansas to electricity markets east of Kansas.”

30. Staff witness Tom DeBaun testified in the CCN proceeding that Staff supported approval of the application because the electric transmission project would promote the public convenience by affording the following opportunities for Kansans:

- An opportunity to implement public policies—both for the development of additional wind generation in Kansas and the construction of additional transmission infrastructure.
- An opportunity to provide market access for additional Kansas wind generation to the bulk power system and markets outside the State of Kansas and outside the footprint of Southwest Power Pool (“SPP”) with an interregional transmission project.
- A benefit to retail ratepayers in Kansas and throughout the SPP Region by recovering the project costs of new economic development transmission facilities through private, user-based funding in place of traditional cost recovery from ratepayers.⁴⁰

31. In its *Order Approving Stipulation & Agreement and Granting Certificate*, the Commission cited to Staff witness Tom DeBaun’s CCN proceeding testimony favorably, noting that Staff thoroughly evaluated the standards the Commission has set forth in previous applications for certificates of convenience, that Staff reviewed prior Commission orders that have interpreted public convenience standards, and that Staff concluded that Grain Belt Express has met those factors and the public convenience standard and should be granted the certificate for its Project as proposed.⁴¹

32. Further, in approving the *Stipulation & Agreement* and granting a CCN for the Project, the Commission made the following findings:

⁴⁰ Docket No. 11-GBEE-624-COC, *Direct Testimony of Michael Peter Skelly*, p. 4 (Aug. 11, 2011).

⁴¹ Docket No. 11-GBEE-624-COC, *Order Approving Stipulation and Agreement and Granting Certificate*, ¶58 (Dec. 7, 2011).

- The Commission finds that by granting the certificate of public convenience and necessity, [Grain Belt Express] will be permitted to develop its plans to improve the transmission system in Kansas as well as aid in the development of Kansas’ wind resources, which allows a new entrant into the business of electric transmission with a primary focus on transmission.⁴²
- The Commission finds that granting the certificate to [Grain Belt Express] will help expand renewable generation resources and transmission infrastructure in Kansas through the use of HVDC technology, which allows for better control when variable wind generation is injected into the grid and for the transfer of significantly more power with less power lost over long distances when compared to AC lines.⁴³
- The Commission finds it would make little sense to approve the certificate for construction of the HVDC line without the AC Collector System. As stated by [Grain Belt Express] in its Application, “Developers will not invest capital in wind generation facilities in western Kansas without reasonable assurances and expectations that transmission infrastructure will be in place on a timely basis to bring their output to market centers. If the Commission were to approve the certificate only for the HVDC line portion of the project, and not include or limit its approval of the AC Collector System, potential investors would be less likely to provide funding for the Project, and the Project might not move forward and thus might not provide significant economic benefits and opportunities in the state that are in the public’s interest. The Commission finds that this would be a significant and unnecessary handicap to the development of [Grain Belt Express].⁴⁴

33. Although many of the Commission’s prior findings regarding the need for the Project relate to the Grain Belt Express Project as a whole, which includes both the HVDC portion of the line Phase 1 and the AC Collector Lines, the Commission clearly recognized that the significant benefits of the Project cannot occur absent the siting of the AC Collector Lines. This is borne out by the discussion of benefits to both Kansas and the surrounding regions, discussed in greater detail below.

⁴² Docket No. 11-GBEE-624-COC, CCN Order, at ¶64.

⁴³ *Id.* at ¶65.

⁴⁴ *Id.* at ¶66.

VI. BENEFITS OF THE AC COLLECTOR LINES TO CONSUMERS INSIDE AND OUTSIDE OF KANSAS AND ECONOMIC DEVELOPMENT BENEFITS IN KANSAS

34. K.S.A. 66-1,180 directs the Commission to consider the benefits of the proposed transmission lines to “both consumers in Kansas and consumers outside the state and economic development benefits in Kansas.” Here, it has been established that the AC Collector Lines are an important component of the Grain Belt Express Project as a whole. Accordingly, the benefits of the AC Collector Lines must be viewed in light of the Project as a whole.

A. Benefits in Kansas

35. In the CCN Order, the Commission found that the Grain Belt Express Project will result in economic benefits to Kansas in the form of jobs, tax revenue, and other economic activity. Specifically, the Commission noted that the economic benefits will provide a tremendous stimulus to the United States economy by facilitating a great deal of new investment in renewable energy projects that would not be possible if the Project did not occur.

36. Some of the economic benefits include: (1) creation of transmission facility jobs; (2) creation of wind generation facility jobs (3) royalties and other income related to the expansion of wind generation projects to Kansas landowners; (4) investment in new renewable power generation in western Kansas; and (5) generation of tax revenues for state and local governments

37. Although the Commissions’ prior findings pertain to the Project as a whole, the AC Collector Lines will also provide significant economic benefits including: (1) the creation of construction jobs, in addition to maintenance and operations jobs, providing wages and benefits to workers; (2) royalties and other income generated for Kansas landowners through the expansion of wind generation projects; (3) millions of dollars invested in long-term local tax revenue, supporting local public services; (4) new jobs and local investment from economic activity; and

(5) with other regional electricity infrastructure, these facilities will fortify the local power grid, shielding it from outages caused by extreme weather events and other regional grid emergencies.

38. The Commission’s prior findings of the significant economic benefits of the Project are now manifold given the passage of time, shifts in economy, and technological advancements since the Commission’s issuance of the CCN Order. These economic benefits are discussed in greater detail in the testimony of Grain Belt Express witness Kevin Chandler, filed concurrently herewith.

39. In the prior CCN proceeding, both the Commission and its Staff acknowledged the regional nature of the transmission system and the need for additional transmission infrastructure to facilitate exportation of renewable generation to load centers. In the intervening years between when the CCN was issued and this Application, the need for a robust transmission system has become even more critical. Numerous recent studies and whitepapers have catalogued the nation’s ever-increasing need for transmission capacity expansion. The United States Department of Energy (“DOE”) recently undertook a National Transmission Needs Study (“DOE Needs Study”)⁴⁵ to identify transmission needs that are currently harming consumers or expected to do so in the future and that could be alleviated by transmission solutions. The DOE Needs Study found that interregional and cross-interconnection investments will improve system resilience and alleviate resource adequacy concerns by enabling increased access to diverse generation resources across different climatic zones.⁴⁶ Further, the DOE Needs Study suggested that states and local governments would benefit from incorporating the findings contained in the Study into their

⁴⁵ https://www.energy.gov/sites/default/files/2023-12/National%20Transmission%20Needs%20Study%20-%20Final_2023.12.1.pdf

⁴⁶ *Id.* at page vi.

respective transmission siting and approval processes,⁴⁷ noting that “states can consider the regional transmission needs discussed in this study and coordinate with neighboring states to identify, plan, approve, and advocate for transmission solutions that both advance state-level policy goals and broader electricity consumer needs.”⁴⁸

40. Additionally, the Grain Belt Express Project will improve reliability and resiliency in Kansas during emergency conditions. The Grain Belt Express Project incorporates HVDC technology that is capable of reversing the flow of electricity on the line to transmit power from east to west or west to east—a capability unique to HVDC projects. During emergency events, the Grain Belt Express Project can import power east to west to stabilize energy prices. Had Grain Belt Express been in operation during Winter Storm Uri in 2021, it could have saved SPP participants millions in costs. Further, in the event of a blackout in the western portion of the Project footprint, power could be reversed to enable the impacted grids to restabilize and recover faster than those only serviced by AC transmission. This is known as a black-start capability.

41. While bidirectional capabilities must be certified or otherwise allowed by RTOs, the line will be operationally capable of bidirectional flow when it is built because Grain Belt Express is using bidirectional converter stations. Therefore, this line serves as a zero marginal cost benefit to the States along the line because the line provides an option for emergency imports of energy and black-start capabilities without dependency on local generation or onsite fuel. This capability paired with the diverse points of interconnection and low ongoing variable maintenance expense, means the line provides a cost-effective, novel import option and system restoration tool

⁴⁷ *Id.* at p. 4.

⁴⁸ *Id.*

for SPP, MISO, and PJM that does not depend on the viability of a coupled power generation facility.

42. In its CCN Amendment Order,⁴⁹ the Missouri Public Service Commission found that the Grain Belt Express Project would “enhance the reliability and resilience of the grid by interconnecting four regions with the potential for black-start and bidirectional capabilities.”⁵⁰ This combination of features “makes the Project a unique system restoration resource, potentially capable of restarting the electric system from a shutdown condition.”⁵¹ The Illinois Commerce Commission similarly found the Project will provide substantial reliability and resiliency benefits, including by providing “valuable system restoration capabilities like ‘black start’ and provide active and reactive power control and fast power run back capabilities.”⁵²

B. Benefits Outside of Kansas

43. Moreover, as the Commission is aware, the significant benefits of the Project were never intended to accrue to Kansas alone. Phase I of the Project will deliver 2,500 MW of power into Missouri, including 1,500 MW into MISO and an additional 1,000 MW into AECI.⁵³ Phase II of the Project will deliver 2,500 MW of power to PJM. These systems stand to benefit enormously from the availability of reliable, high-capacity-factor, and affordable renewable energy from western Kansas.

44. As found by the Missouri Public Service Commission (“MPSC”), there is “substantial evidence of increasing demand for renewable energy from Missouri cities, industrial,

⁴⁹ MPSC Case No. EA-2023-0017, *Report and Order* (Oct. 12, 2023).

⁵⁰ *Id.* ¶127.

⁵¹ *Id.*

⁵² *See* ICC Dkt. 22-0499, *Order*, p. 36 (Mar. 8, 2023).

large corporate, and utility customers that are setting renewable energy standards and carbon reduction goals.”⁵⁴ The MPSC further found that the need for the Project is “evident in that the Project is needed for reliability and resiliency of the grid and for national security” and that the Project “will help guard against price spikes and outages such as those experienced by Winter Storm Uri and Elliot.”⁵⁵

45. As found by the Illinois Commerce Commission (“ICC”), “Grain Belt Express has demonstrated that there is a need to address a lack of adequate transmission service to move electricity from the resource area of western Kansas to the MISO and PJM markets, including Illinois. Grain Belt Express has demonstrated sufficient demand for the service. Grain Belt Express has also demonstrated that the Project will provide substantial reliability and resiliency benefits by interconnecting three regions. The Commission finds that Illinois residents will benefit from this interconnection and delivery of electricity from this Project.”⁵⁶

46. Accordingly, there are meaningful and sizable benefits to both Kansas and the surrounding regions. These benefits are both facilitated and expedited via the AC Collector Lines at issue in this proceeding.

VII. ROUTING STUDY, SITING CONSIDERATIONS, AND PROPOSED ROUTES FOR THE AC COLLECTOR LINES

47. As noted above, Grain Belt Express is seeking transmission line siting authority to build two AC Collector Lines that will make up a portion of the AC Collector System; (1) the Meade-Dodge City Line, a double-circuit 345 kV transmission line of approximately 46 miles in length across portions of Gray, Meade, and Ford Counties, including a potential future switchyard;

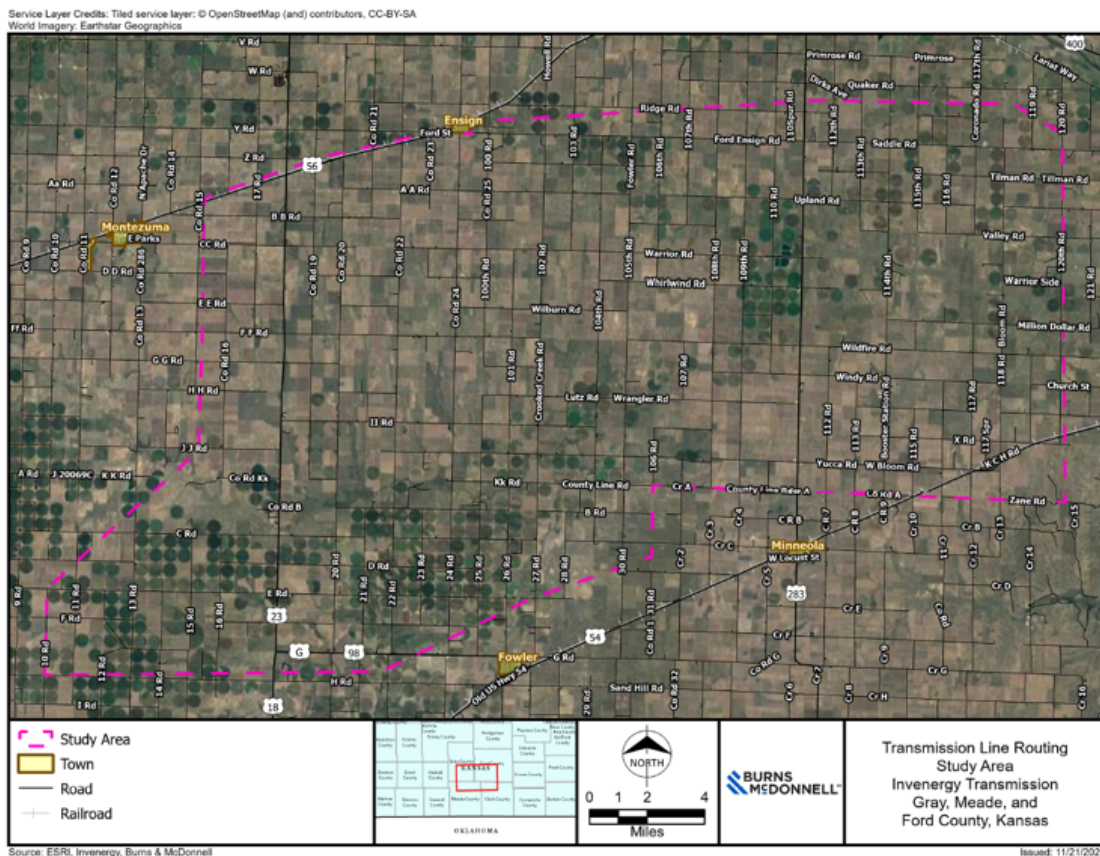
⁵⁴ MPSC Case No. EA-2023-0017, *Report and Order*, p. 54 (Oct. 12, 2023).

⁵⁵ *Id.* at p. 55.

⁵⁶ ICC Dkt. 22-0499, *Order*, p. 36 (Mar. 8, 2023).

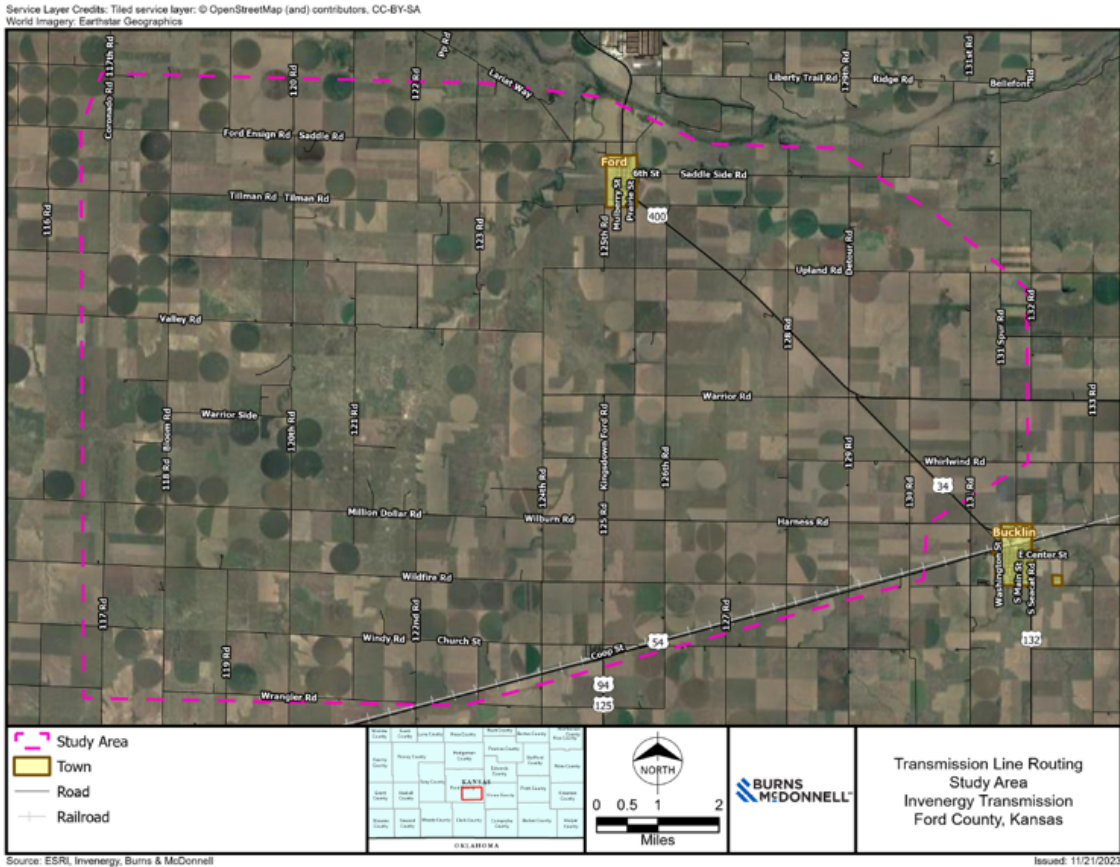
and (2) the Bucklin-Dodge City Line, a double-circuit 345 kV transmission line of approximately 16 miles in length traversing a portion of Ford County, including a potential future switchyard. As described below and in the supporting testimony of Jamie Precht, the Proposed Routes satisfy the statutory requirement, as set forth at K.S.A. 66-1,180, that the proposed location of the transmission lines be reasonable.⁵⁷

48. The two AC Collector Lines share a point of interconnection —a switchyard adjacent to the Ford County HVDC converter station. More detail regarding the Study Areas for the AC Collector Lines can be found in the testimony of Grain Belt Express witness Jamie Precht, but generally the Study Area for the Meade-Dodge City Line, comprising portions of Gray, Meade, and Ford County, is as depicted below:



⁵⁷ K.S.A. 66-1,180 (“The commission shall make its decision with respect to ... the reasonableness of the location of the proposed electric transmission line”).

49. The Study Area for the Bucklin-Dodge City Line in Ford County is as depicted below:



50. The proposed AC Collector Lines will traverse primarily pastures and farmland in Gray, Meade, and Ford counties, Kansas. Maps of the Proposed Routes are included as Exhibits JP-3 and JP-4 to the testimony of Jamie Precht and discussed in greater detail by Ms. Precht. In developing its Proposed Routes for the AC Collector Lines, Grain Belt Express sought to reduce the AC Collector Lines’ environmental impacts by: (1) minimizing impacts to wetlands, waterbodies, and known cultural and archeological resources; (2) minimizing or avoiding protected or sensitive species and habitat impacts; (3) minimizing impacts to federal, state-owned, and tribal lands; (4) minimizing or avoiding to the extent possible the number of center pivot irrigation systems impacted; (5) minimizing the miles of floodways/floodplains crossed, in

addition to other planning and siting guidelines. Further, Grain Belt Express sought to reduce impacts to existing infrastructure by considering and designing proper clearances to existing structures, including bridges, culverts, oil and gas wells, transmission lines, and telecom towers.

51. Grain Belt Express has employed Burns & McDonnell Engineering Company, Inc. (“Burns & McDonnell”) to assist it in selecting Proposed Routes. After initial mapping, inspection and a series of both in person open houses in February 2024, through which it received input from landowners and residents in the areas along potential routes, the Grain Belt Express Routing Team (“Routing Team”) identified the Proposed Routes. Grain Belt Express also will undertake coordination with, and as necessary, obtain approvals and permits from the following agencies and governmental entities for the AC Collector Lines: the U.S. Army Corps of Engineers; the U.S. Fish and Wildlife Service; the Kansas State Historic Preservation Offices; the Kansas Department of Wildlife and Parks; the Kansas Department of Agriculture – Division of Water Resources; the Kansas Department of Health and Environment; and officials in Gray, Meade, and Forde counties, in which the AC Collector Lines will be located.

52. Prior to filing this siting application, Grain Belt Express began coordinating with the Commission Staff and the Commission’s Office of Public Affairs and Consumer Protection to schedule the local public hearing required by K.S.A. 66-1,178 and will comply with the publication of notice of local public hearing requirements in accordance with K.S.A. 66-1,179.

53. Grain Belt Express also sought and received input from state and federal agencies. Data and feedback received from these contacts was used to identify routes that minimize adverse social and environmental impacts of the lines. As described in the Routing Study, the final set of route alternatives consisted of individual segments that could be combined in different arrangements to form a continuous path between the endpoints.

54. For the Meade Line, 75 alternate route links were identified which could be used to create alternate routes between the Meade Origination Point and the Kansas converter station switchyard. Ultimately, for the Meade Line, the refined alternate route links combined to form 6,152 alternate routes that would connect the Meade endpoints. Following additional analysis, Grain Belt Express' Routing Team ultimately identified its preferred route, which is presented as the Meade Proposed Route, as described in more detail by Jamie Precht and in the Routing Study.

55. For the Bucklin Line, 46 alternate route links were identified which could be used to create alternate routes between the Bucklin Origination Point and the Kansas converter station switchyard. For the Bucklin Line, the refined alternate route links combined to form 696 refined alternate routes that would connect the Bucklin endpoints. Following additional analysis, Grain Belt Express' routing team ultimately identified its preferred route, which is presented as the Bucklin Proposed Route, as described in more detail by Jamie Precht and in the Routing Study.

56. The Meade Proposed Route is described in detail in the Routing Study provided as Exhibit JP-2 to the testimony of Jamie Precht, and a legal description of the Meade Proposed Route is provided as Exhibit JP-6.

57. The Bucklin Proposed Route is described in detail in the Routing Study provided as Exhibit JP-2 to the testimony of Jamie Precht, and a legal description of the Bucklin Proposed Route is provided as Exhibit JP-5.

58. Once the Proposed Routes and route alternatives were developed, the Burns & McDonnell public involvement team created notification boundaries to identify potentially affected parcels and landowners. The notification boundary was established at 1,000 feet from all potential centerlines in each county.

59. Grain Belt Express has identified its Proposed Routes based on the results of the Routing Study. Given the likelihood of changes to the route proposed by affected landowners, Grain Belt Express requests that the Commission approve the Proposed Routes but permit Grain Belt Express the flexibility to adjust the route, or microsite, as needed to accommodate minor modifications proposed by landowners, due to previously-unknown biological, cultural, or tribal resources, unique local topography, or for engineering reasons.

VIII. DESCRIPTION OF THE PROPOSED FACILITIES

60. The proposed AC Collector Lines will be 345 kV lines. The Meade-Dodge City Line will initially interconnect approximately 1,200+ MW. The Bucklin-Dodge City Line will initially interconnect approximately 600+ MW. For the transmission structures, Grain Belt Express will utilize either single-circuit or double-circuit V-String Suspension steel poles, with an average span length of 1,100-1,200 feet (or on average approximately 4 to 6 structures per mile) for both single and double circuit, and a typical structure height of 150 feet or 170 feet, respectively. Structural foundations will be predominantly direct embedded or on reinforced concrete foundations. Guyed structures will generally be avoided unless soil conditions, unique topography, temporarily if necessary, or heavy-angles require guyed structures. Average foundation diameters will likely range from 6 to 12 ft, with average depths ranging from 25 to 50 ft (depending on structure loading and soil conditions).

61. Potential future switchyards consisting of breaker-and-a-half bus schemes may be installed along the corridors of the Meade and Bucklin lines. The switchyards may allow for future generation facilities to connect to the AC Collector Lines.

62. To accommodate the transmission structures, Grain Belt Express will seek to obtain voluntary easements that are typically 150 feet wide, based upon the design of the AC

Collector Lines, anticipated structure types, number of structures, span distances, terrain, and soil conditions. This proposed ROW width may vary at some locations to accommodate topographic features and crossing requirements and to provide flexibility in final structure placement. Additional detail regarding the transmission structures, conductors, and ROW may be found in the Direct Testimony of Grain Belt Express witness David Gelder.

IX. CONSTRUCTION PRACTICES

63. Grain Belt Express will design the Project according to applicable Commission requirements, Institute of Electrical and Electronics Engineers guidelines, American National Standards Institute standards, Occupational Safety and Health Administration requirements, North American Reliability Corporation (“NERC”) standards, the National Electric Safety Code (“NESC”), and good utility practice. Public safety and worker safety are critical considerations in the design, construction, and operation of transmission facilities, and safety and security have been and will continue to be a major focus in the preparation of all specifications and designs. Based on the results of its preliminary engineering studies, Grain Belt Express has designed the Project to ensure safe and reliable operation.

64. Grain Belt Express will comply with the requirements of K.S.A. 66-183 to string and maintain its wires to avoid unreasonable injury or interference from or with the wires of other utilities. Grain Belt Express expects to submit a wire-stringing application pursuant to K.A.R. 82-12-1 *et seq.* for the Commission’s review and approval after design of the facilities are complete.

65. Grain Belt Express will ensure that construction of the lines will include initial clearing and continuous vegetation management to maintain clearances and access points in accordance with the NESC, the Commission’s Wire-Stringing Rules contained in K.A.R. 82-2-1 *et seq.* and NERC requirements. Similarly, clearances to ground, structures, and insulator swing

will adhere to NESC requirements, and Grain Belt Express will comply with the standard for minimum vertical clearance of wires, conductors, and cables over railroad tracks, if applicable, as required by the NESC and K.A.R. 82-12-2.

66. To the extent practicable, construction equipment and other project or contractor vehicles will traverse along existing roads and public rights-of-way in order to access work areas. If necessary, temporary or permanent access roads will be utilized, and, if temporary, Grain Belt Express will perform restoration activities so that impacted areas revert to their prior condition. Grain Belt Express also anticipates the need to acquire land rights associated with construction and ongoing access to the AC Collector Lines, as well as material laydown yards. This additional ROW may be required where Grain Belt Express cannot access the ROW directly from the road, *e.g.*, due to water bodies or wetlands or other environmentally significant terrain features.

67. Grain Belt Express intends to coordinate with the Kansas Department of Health and Environment (“KDHE”) prior to commencing construction to obtain and comply with the necessary storm water permits, and to develop and submit a Stormwater Pollution Prevention Plan (“SWPPP”) to reduce the amount of discharge in storm water runoff from the construction site.

X. PUBLIC OUTREACH

68. Grain Belt Express believes that an integral part of the routing and transmission line siting process is early and consistent public outreach. The public outreach process includes multiple forms of public input, including communications with county commissioners, virtual and in-person public open houses, and direct landowner communications.

69. Numerous communication tools were utilized to inform and educate stakeholders in the communities through which the AC Collector Lines will traverse, with the objective being proactive two-way communication between Grain Belt Express team members and public stakeholders. Grain Belt Express has built an extensive stakeholder engagement track record and a robust active stakeholder engagement program. To seek stakeholder input and keep stakeholders and the public informed, Grain Belt Express offers channels to solicit feedback and answer questions from stakeholders and the public. These channels include:

- Dedicated project office in Dodge City, KS (607 N 2nd Avenue, Dodge City, KS 67801)
- Project office number with a local prefix (620-371-4116)
- Social media (Facebook)
- Project website (www.grainbeltexpress.com)
- Email (connect@grainbeltexpress.com)
- Grain Belt Express LLC hotline (866-452-4082)
- Routine local outreach and engagement (county commissions, local chambers of commerce, economic development leaders, school districts, and community nonprofit organizations)

70. An email address (connect@kansascollector.com) was also created and continues to be maintained by HDR for Grain Belt Express. The email address and virtual open house website (<https://www.kansascollector.com/>) were established for the initial public outreach and open house process and will remain in effect throughout the AC Collector Lines' development and construction phases so that stakeholders can continue to provide input and ask questions of Grain Belt Express and the Routing Team. Additional detail regarding the public outreach process is provided in the Direct Testimony of Emily Hyland.

71. Beginning in February 2024, Grain Belt Express published advertisements in newspapers of general circulation in Ford, Meade, and Gray counties to notify interested parties of public open houses to discuss the AC Collector Lines. Grain Belt Express hosted both daytime and evening open houses in Ford County on February 27, 2024 in Meade County on February 28, 2024, and in Gray County on February 29, 2024. Landowner notification postcards were sent to directly impacted landowners on Bucklin-Dodge City and Meade-Dodge City lines in Ford County, Meade County and Gray County. The postcards contained information for each meeting, project information, and how landowners can leave comments for the project team. A total of 500 notifications were mailed to landowners across the three counties. A public notice ran in each county's newspaper of record. A public notice ran twice ahead of the scheduled meeting. In the *Dodge City Daily Globe*, an English ad ran alongside a Spanish ad, as well as an additional two Spanish ads in their Spanish version of the paper. Each placement was a full-page color advertisement, with the exception of the *Jacksonian*, which was in black and white. Additional newspaper ads thanking participants and reminding the public of the virtual meeting ran in newspapers in Ford, Meade and Gray Counties. To increase access to the public meeting materials and input opportunities, a supplemental virtual open house was created. The virtual meeting was hosted on the AC Collector Line website, www.kansascollector.com. The virtual meeting was accessible Friday, February 23 through Friday, March 15, 2024.

72. In February, further outreach efforts took place as representatives from Grain Belt Express met with County Commissioners in Ford, Meade, and Gray Counties, along with state legislators representing these areas. During these engagements, details about the AC Collector Lines and upcoming open houses were shared. At the open houses, local officials in attendance received informational packets containing printed copies of the meeting's display boards. For those

county commissioners and state legislators unable to attend, the packets were delivered via mail, email, or in-person visits. More information on the public meeting and notice process can be found in Emily Hyland's Direct Testimony. The open houses were designed as a forum through which Grain Belt Express could introduce landowners and stakeholders to the AC Collector Lines, answer stakeholder questions, obtain a better understanding of local geography and land use through direct contact with potentially impacted landowners, and identify landowner areas of concern. Attendees were provided the opportunity to complete a comment card form with their name and contact information in order to provide written feedback or ask questions. At each open house interested stakeholders were able to view table boards, large maps of the area, and received a handout containing a description of the AC Collector Lines, timeline, overview map of the Study Area(s), routing process steps, and diagram of typical structure types. The open houses were well-attended, with approximately 80 participants in Ford County, 34 participants in Meade County, and 26 participants in Gray County.

73. In order to increase access, participation, and opportunities for input, a supplemental virtual meeting website was available for a period of time overlapping the in-person open house meetings. The virtual meeting website was open for several weeks after the open houses to provide sufficient time for interested stakeholders to provide input. The virtual meeting website allowed parties to view the study area for the AC Collector Lines, read about the benefits of the AC Collector Lines, view the anticipated timeline for the AC Collector Lines, see diagrams of typical structures, and provided multiple methods to comment on the AC Collector Lines, including the ability of a landowner to comment directly in an interactive map of the Study Area(s). The virtual meeting website was accessible from February 26, 2024 through March 15, 2024 to give parties sufficient time to view and comment on the AC Collector Lines.

74. Pursuant to K.S.A. 66-1,178(a)(2), a list of the names and addresses of the landowners of record whose land or interest therein Grain Belt Express proposes to acquire in connection with the construction of the AC Collector Lines, or whose land is located within 1,000 feet of the center line of the easement where the lines are proposed to be located, is included with this Application as Exhibits EH-3 and EH-4 to the Direct Testimony of Emily Hyland.

XI. PROJECT SCHEDULE

75. Grain Belt Express anticipates that the in-service date for the AC Collector Lines will be as early as 2028. Grain Belt Express’ currently anticipated project schedule for the AC Collector Lines is provided below:

Public and Stakeholder Engagement	Q1 2024
Filing of Proposed Route(s) with the KCC	Q2 2024
Regulatory Decision	Q3 2024
Field studies, permitting, engineering, and easement acquisition	Q3 2024 – Q1 2026
Construction	As soon as Q2 2026
Anticipated in-service date	As soon as 2028

76. Subject to receiving all necessary regulatory approvals and permits, Grain Belt Express anticipates that field studies, permitting, engineering, and voluntary easement acquisition will commence shortly after a Commission decision is rendered in this proceeding and continue through the third quarter of 2025. While dependent upon permitting, land acquisition, and engineering timing, construction of the AC Collector Lines could begin as soon as Q2 2026. The anticipated in-service date of the AC Collector Lines could be as early as 2028.

77. As previously noted, Grain Belt Express anticipates the need for additional AC transmission infrastructure serving interconnecting projects in other geographic areas surrounding the Kansas terminus. While the exact timeline is yet to be determined, Grain Belt Express’ priority

will be to consolidate infrastructure to the extent possible to minimize the burden on the land, landowners, and the Commission, while maintaining the AC Collector Line construction schedule.

XII. ANTICIPATED PROJECT COST

78. In the 2011 Stipulation & Agreement, the parties agreed that the cost of the Project and AC Collector System shall not be recovered through the SPP cost allocation process or from Kansas ratepayers. Grain Belt Express' siting certificate was conditioned on the representation that there will be no Project or AC Collector System cost allocation to the SPP or recovery of costs from Kansas ratepayers, other than *de minimis* costs ancillary to any needed interconnection to the SPP.⁵⁸

XIII. CONCLUSION

WHEREFORE, based on the above and foregoing, Grain Belt Express respectfully requests that the Commission: (i) grant a siting permit conferring on Grain Belt Express the right to construct (1) a double-circuit 345 kV transmission line of approximately 46 miles in length and associated facilities across portions of Gray, Meade, and Ford Counties, including a potential future switchyard (*i.e.*, the Meade-Dodge City Line); and (2) a single or double-circuit 345 kV transmission line of approximately 20 miles in length and associated facilities across portions of Ford County, including a potential future switchyard (*i.e.*, the Bucklin-Dodge City Line); (ii) find that the necessity for and the reasonableness of the location of the lines and associated facilities have been established by the application and supporting testimony of Grain Belt Express, as required by K.S.A. 66-1,178; and (iii) grant such other and further relief as may be appropriate.

⁵⁸ Docket No. 11-GBEE-623-COC, *Order Approving Stipulation and Agreement and Granting Certificate*, December 7, 2011 (hereafter, the "CCN Order"), at ¶22(c).

Respectfully submitted,

/s/ Anne E. Callenbach

Anne E. Callenbach (KS Bar No. 18488)

Andrew O. Schulte (KS Bar No. 24412)

Jared R. Jevons (KS Bar No. 28913)

900 West 48th Place, Suite 900

Kansas City, Missouri 64112

(816) 572-4760

Fax No. (816) 751-1536

acallenbach@polsinelli.com

aschulte@polsinelli.com

jjevons@polsinelli.com

ATTORNEYS FOR GRAIN BELT EXPRESS LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of May, 2024, a true and accurate copy of the above and foregoing was sent electronically to the following:

Carly Masenthin, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604
c.masenthin@kcc.ks.gov

Jeff McClanahan, Director, Utilities Division
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604
j.mcclanahan@kcc.ks.gov

Justin Grady, Utilities Division
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604
j.grady@kcc.ks.gov

Brad Pnazek
Vice President, Transmission Business
Development
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
bpnazek@invenergy.com

Nicole Luckey
Senior Vice President
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
nluckey@invenergy.com

Kevin Chandler
Director, Transmission Business
Development
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
kchandler@invenergy.com

/s/ Anne E. Callenbach
Anne E. Callenbach

VERIFICATION

I, Anne Callenbach, do solemnly, sincerely and truly declare and affirm that I am counsel to Grain Belt Express, LLC, that I have read the foregoing pleading and know the contents thereof, and that the facts set forth therein are true and correct to the best of my knowledge and belief, and this I do under the pains and penalties of perjury.

By:  _____
Anne Callenbach

May 31, 2024