

**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            )  
Lines and Associated Facilities through             )  
Gray, Meade, and Ford Counties, Kansas.           )

Docket No. 24-GBEE-790-STG

**REBUTTAL TESTIMONY OF**

**KEVIN CHANDLER**

**ON BEHALF OF**

**GRAIN BELT EXPRESS LLC**

**July 26, 2024**

## Contents

|   |    |
|---|----|
| I. Introduction .....   | 3  |
| II. Response to Staff’s AC Collector System Master Plan Recommendations .....                             | 4  |
| III. Response to Staff’s Recommendation to Require Interconnection Agreements Prior to Construction ..... | 7  |
| IV. Summary of grain belt Express’ agreement to Conditions .....  | 9  |
| V. Response to Testimony Of Bradley Boyd .....  | 10 |
| A. <i>Response to Mr. Boyd’s Assertions Regarding the Thresher Wind Agreement</i> .....                   | 12 |
| B. <i>Response to Mr. Boyd’s Assertions Regarding Notice</i> .....  | 13 |
| C. <i>Alternative Route Proposals</i> .....   | 15 |
| VI. Conclusion .....  | 17 |

1       **I. INTRODUCTION**

2           **Q. Please state your name, business address, and present position.**

3           A. My name is Kevin Chandler. I am a Director of Transmission Business  
4 Development for Invenergy LLC (“Invenergy”). My business address is One South Wacker Drive,  
5 Suite 1800, Chicago, IL 60606.

6           **Q. Are you the same Kevin Chandler who previously filed direct testimony in this**  
7 **proceeding?**

8           A. Yes, I am.

9           **Q. Has this testimony been prepared by you or under your direct supervision?**

10          A. Yes, it has.

11          **Q. What is the purpose of your rebuttal testimony?**

12          A. The purpose of my testimony is to respond to portions of testimony submitted by  
13 Staff witness Paul Owings and Bradley Boyd. Specifically, I will address Mr. Owing’s  
14 recommendations that Grain Belt Express develop a master plan showing the anticipated location,  
15 quantity, and length of AC Collector Lines; that future construction be limited to the geographic  
16 area identified in a master plan; Grain Belt Express should demonstrate compliance with K.S.A.  
17 66-1,171; and that Grain Belt Express should acquire interconnection agreements with generators  
18 prior to constructing additional AC Collector Lines. Additionally, I will address Mr. Boyd’s  
19 testimony relating to his concerns with the Proposed Route, the process for notifying him of the  
20 routing process, his suggested alternatives, and another potential alternative under review by Grain  
21 Belt Express.

22          **Q. Are you sponsoring any exhibits as part of your direct testimony?**

23          A. Yes, I am sponsoring the following exhibit:

- 1                   • Exhibit KC-2<sup>1</sup> – Map of the Grain Belt Alternative Route and Proposed Route

2           **II.     RESPONSE TO STAFF’S AC COLLECTOR SYSTEM MASTER PLAN**  
3           **RECOMMENDATIONS**

4           **Q.     What is Staff’s recommendation regarding the creation of an AC Collector**  
5 **System master plan?**

6           A.     Staff recommends that prior to filing another AC Collector Line siting application,  
7 “GBE shall develop an AC Collector System master plan showing the anticipated location,  
8 quantity, and length of AC Collector Lines.”<sup>2</sup> Staff also recommends that “GBE shall limit future  
9 AC Collector Line construction to the geographic area identified in the AC Collector Line master  
10 plan approved by the Commission.”<sup>3</sup> Staff also “recommends the Commission require GBE to  
11 develop a long-term master plan associated with AC Collector System build out before filing  
12 additional AC Collector Line Siting Applications with the Commission.”<sup>4</sup> Finally, Staff  
13 recommends that “GBE should demonstrate compliance with K.S.A. 66-1,171 within the AC  
14 Collector System master plan.”<sup>5</sup>

15          **Q.     What is Grain Belt Express’ position on Staff’s recommendation to develop a**  
16 **master plan showing the anticipated location, quantity, and length of AC Collector lines?**

17          A.     Grain Belt Express generally finds the recommendation reasonable. However,  
18 Grain Belt Express will not be able to finalize the location and length of any future route until the  
19 public engagement process and line siting application has been approved for each future AC  
20 collector line. Additionally, Grain Belt Express is required to comply with federal open access

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<sup>1</sup> Exhibit KC-1 was included with my Direct Testimony.

<sup>2</sup> Direct Testimony of Paul Owings, p. 34 (July 3, 2024) (“Owings Direct Testimony”).

<sup>3</sup> *Id.* at p. 35.

<sup>4</sup> *Id.* at p. 13.

<sup>5</sup> *Id.* at p. 14.

1 laws and regulations that may influence future AC Collector System needs. Accordingly, a master  
2 plan will necessarily be limited to preliminary information about the location, quantity, and length  
3 of future AC collector lines and would need to permit flexibility on the final location, quantity,  
4 and length of future AC collector lines.

5 **Q. Staff also states that a precise definition of the AC Collector System's**  
6 **geographic region be established as part of an AC Collector System master plan and that**  
7 **future AC Collector Line construction be limited to the identified region. Is that reasonable?**

8 A. As noted above, Grain Belt Express is required to comply with federal open access  
9 laws and regulations that may influence future AC Collector System needs. Specifically, Grain  
10 Belt Express is required to provide a comparable level of service to all generation projects  
11 requesting interconnection into Grain Belt Express. Grain Belt Express cannot unreasonably  
12 discriminate against future generation projects via the location of AC collector lines. While the  
13 master plan could identify an anticipated geographic region, the Commission should allow for  
14 flexibility if Grain Belt Express can demonstrate that adjustment to the region is warranted.

15 **Q. What is Grain Belt Express' position on whether the master plan should be**  
16 **developed before filing additional AC Collector Line Siting Applications with the**  
17 **Commission?**

18 A. Grain Belt Express is agreeable to filing the master plan as part of the next AC  
19 collector line siting application.

20 **Q. What is Grain Belt Express' position on the recommendation that it**  
21 **demonstrate compliance with K.S.A. 66-1,171 within the AC Collector System master plan?**

22 A. I am not an attorney, but I am advised by counsel that Grain Belt Express is not  
23 subject to K.S.A. 66-1,171 because K.S.A. 66-1,171 applies to retail electric service providers.

1 Grain Belt Express is not a retail electric service provider in Kansas. Further, I've been advised  
2 that K.S.A. 66-1,171 is a "declaration of public policy," not a compliance standard. Nevertheless,  
3 several of the public policy declarations set forth in K.S.A. 66-1,171 are accounted for in a typical  
4 routing process. The declarations of public policy in K.S.A. 66-1,171 are as follows:

- 5 (a) Encourage the orderly development of retail electric service;
- 6 (b) avoid wasteful duplication of facilities for the distribution of electricity;
- 7 (c) avoid unnecessary encumbrance of the landscape of the state;
- 8 (d) prevent waste of materials and natural resources;
- 9 (e) facilitate the public convenience and necessity; and
- 10 (f) minimize disputes between retail electric suppliers which may result in  
11 inconvenience, diminished efficiency and higher costs in serving the consumer.

12 Ignoring for the moment that the declarations apply to "retail electric service" and "distribution of  
13 electricity," each of the declarations in subsections (b) through (e) are accounted for in the routing  
14 process conducted by Grain Belt Express for this proceeding and would be accounted for in a  
15 master plan and in subsequent siting applications. Subsections (a) and (f), on the other hand, are  
16 clearly limited to retail electric providers with service territories. Accordingly, Grain Belt Express  
17 does not object to the Commission considering the public policy declarations in K.S.A. 66-  
18 1,171(b)-(e) as part of its review of the master plan and future line siting applications, but Grain  
19 Belt Express should not be held to a "compliance" standard based on an inapplicable statute that  
20 is different than other utilities submitting line siting applications.

21 **Q. Do you have recommended modifications to Staff's proposed conditions**  
22 **regarding the master plan?**

23 A. Yes. I recommend that Staff's proposed conditions be modified as follows:

- 24 • GBE shall develop an AC Collector System master plan showing the anticipated  
25 location, quantity, and length of AC collector lines, to be filed with its next AC

1 collector line siting application. ~~GBE should demonstrate compliance with K.S.A.~~  
2 ~~66-1,171 within the AC Collector System master plan.~~

3 GBE shall limit future AC collector line construction to the geographic area  
4 identified in the AC collector line master plan, ~~approved by the Commission.~~ If  
5 any future AC collector line extends beyond the geographic area identified in the  
6 AC collector line master plan, GBE shall include an updated master plan in the  
7 line siting application for any such AC collector line(s) and explain why the  
8 geographic area was modified.

9 **III. RESPONSE TO STAFF'S RECOMMENDATION TO REQUIRE**  
10 **INTERCONNECTION AGREEMENTS PRIOR TO CONSTRUCTION**

11 **Q. What is Staff's recommendation regarding the acquisition of interconnection**  
12 **agreements with generators in the vicinity of AC Collector Line Origination points?**

13 A. Staff recommends that "GBE shall acquire interconnect agreements with generators  
14 in the vicinity of AC Collector Line Origination points prior to constructing AC Collector Lines."<sup>6</sup>  
15 Staff also recommends that "[i]f interconnection agreements are not formed and the AC Collector  
16 Lines are not constructed, GBE shall relinquish easements back to property owners."

17 **Q. Why does Staff make that recommendation?**

18 A. That recommendation is based upon Staff's concern about the certainty of the  
19 origination points, which Staff describes as speculative. However, as explained in my Direct  
20 Testimony, the western origination point for the Meade Line was selected in large part to  
21 accommodate renewable energy projects in the vicinity of Meade County. Similarly, the eastern  
22 origination point for the Bucklin Line was selected because it will facilitate interconnection with  
23 renewable energy projects under development in Ford and adjacent counties.<sup>7</sup> Grain Belt Express  
24 has been in communication with the developers of the renewable energy projects, including

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<sup>6</sup> Owings Direct Testimony, p. 35.

<sup>7</sup> Direct Testimony of Kevin Chandler, p. 10 (May 31, 2024) ("Chandler Direct Testimony").

ENGIE Renewables NA LLC and its affiliates, as will be further explained in Grain Belt Express’ Response to Public Comments, due August 2, 2024.

**Q. What is Grain Belt Express’ position on whether interconnection agreements with generators should be acquired prior to constructing the AC Collector Lines?**

A. Grain Belt Express does not object to the concept but notes that Staff’s proposal lacks certainty around the meaning of “beginning construction,” lacks specificity regarding voluntary easements versus involuntary easements, and does not provide a timeframe for when easements should be relinquished if the AC Collector Lines are not constructed. To address the first issue, Grain Belt Express recommends using the same trigger as the “Financing Requirement” established in Docket No. 19-GBEE-253-ACQ. The Financing Requirement states that Grain Belt Express “will not install transmission facilities on easement property in Kansas until it has obtained commitments for funds in an amount equal to or greater than the total cost to build the entirety of Phase I of the Project.”<sup>8</sup> Likewise, Grain Belt Express would agree to the following condition in this case:

Grain Belt Express shall not install transmission facilities on easement property in Kansas until it has executed an interconnect agreement or agreements with a generator or generators in the vicinity of the relevant AC Collector Line origination points.

**Q. What do you recommend regarding the return of easements if the AC Collector Lines are not constructed?**

A. First, the condition should only apply to involuntary easements, since voluntary easements are privately negotiated. Second, the return of involuntary easements should only be triggered after sufficient time has passed for Grain Belt Express to work through any unforeseen

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<sup>8</sup> Docket No. 19-GBEE-253-ACQ, Order Granting Motion to Amend the Unanimous Settlement Agreement, ¶ 18 (June 13, 2023).



1 delays. Although Grain Belt Express anticipates beginning construction of the AC Collector Lines  
2 in 2026, in order to provide flexibility and to guard against unforeseen delays, Grain Belt Express  
3 would agree to the following condition:

4 If Grain Belt Express acquires any involuntary easements for AC Collector Lines  
5 by means of eminent domain and does not execute an interconnection agreement or  
6 agreements with a generator or generators in the vicinity of the relevant AC  
7 Collector Line origination point within five years of the date such easements rights  
8 are recorded, Grain Belt Express agrees to return possession of such easement to  
9 the landowner within 60 days and record the dissolution of the easement without  
10 requirement of any reimbursement payments by the landowner.

11 **IV. SUMMARY OF GRAIN BELT EXPRESS' AGREEMENT TO CONDITIONS**

12 **Q. You discussed several of Staff's proposed conditions above. Do any other**  
13 **Grain Belt Express witnesses respond to Staff's proposed conditions?**

14 A. Yes. Mr. Owings listed seven proposed conditions at pages 34-35 of his Direct  
15 Testimony. I respond to Condition Nos. 1, 2, 6 and 7. David Gelder responds to Condition No. 3.  
16 Carlos Rodriguez responds to Condition Nos. 4-5.

17 **Q. Can you please summarize the conditions that Grain Belt Express is agreeable**  
18 **to?**

19 A. Certainly. Based on my Rebuttal Testimony, along with the Rebuttal Testimony of  
20 Mr. Gelder and Mr. Rodriguez, Grain Belt Express would agree to the following conditions:

21 (1) Grain Belt Express shall develop an AC Collector System master plan showing  
22 the anticipated location, quantity, and length of AC collector lines, to be filed  
23 with its next AC collector line siting application.

24 (2) Grain Belt Express shall limit future AC collector line construction to the  
25 geographic area identified in the AC collector line master plan. If any future  
26 AC collector line extends beyond the geographic area identified in the AC  
27 collector line master plan, Grain Belt Express shall include an updated master

1 plan in the line siting application for any such AC collector line(s) and explain  
2 why the geographic area was modified.

3 (3) Grain Belt Express will make a compliance filing in this docket prior to  
4 construction regarding its determination of whether the Bucklin-Dodge City  
5 Line will be single or double circuit.

6 (4) Grain Belt Express will share the Southwest Power Pool's Planning Study and  
7 Design Study with Staff when they are available.

8 (5) Grain Belt Express shall not install transmission facilities on easement property  
9 in Kansas until it has executed an interconnect agreement or agreements with a  
10 generator or generators in the vicinity of the relevant AC Collector Line  
11 origination points.

12 (6) If Grain Belt Express acquires any involuntary easements for AC Collector  
13 Lines by means of eminent domain and does not execute an interconnection  
14 agreement or agreements with a generator or generators in the vicinity of the  
15 relevant AC Collector Line origination point within five years of the date such  
16 easements rights are recorded, Grain Belt Express agrees to return possession  
17 of such easement to the landowner within 60 days and record the dissolution of  
18 the easement without requirement of any reimbursements payments by the  
19 landowner.

20 **V. RESPONSE TO TESTIMONY OF BRADLEY BOYD**

21 **Q. Have you reviewed Bradley Boyd's Direct Testimony?**

22 **A. Yes, I have.**

1           **Q.     Please summarize.**

2           A.     Mr. Boyd is a landowner along Grain Belt Express' Proposed Route for the Meade-  
3 Dodge City Line. Mr. Boyd challenges the Meade-Dodge City Line's Proposed Route based upon  
4 several assertions related to an agreement between Mr. Boyd and Thresher Wind, LLC ("Thresher  
5 Wind Agreement") and that he "never heard from Invenergy or Thresher Wind."<sup>9</sup> Mr. Boyd's  
6 direct testimony also proposes an alternative route.<sup>10</sup> Additionally, Mr. Boyd presented a second  
7 alternative route after his direct testimony was filed.

8           **Q.     What is the scope of your response?**

9           A.     My response addresses Mr. Boyd's assertions regarding the Thresher Wind  
10 Agreement and that he "never heard anything from Invenergy or Thresher Wind." It is my  
11 understanding that many of the claims made by Mr. Boyd are legal in nature and are being (and  
12 will be) addressed in pleadings beyond my Rebuttal Testimony. As a result, in my Rebuttal  
13 Testimony, I will only be addressing Mr. Boyd's factual allegations with regard to the Thresher  
14 Wind Agreement.

15           As for Mr. Boyd's proposed alternative routes, Jamie Precht's Rebuttal Testimony  
16 addresses the environmental and engineering issues that make those alternative routes infeasible.  
17 However, I will discuss a potential alternative route (the "Grain Belt Alternative") that could  
18 address some of Mr. Boyd's concerns regarding the location of the proposed route on his property.

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<sup>9</sup> Direct Testimony of Bradley B. Boyd, at pp. 2–4 ("Boyd Direct Testimony").

<sup>10</sup> *Id.* at pp. 4–5.

1                   A.     ***Response to Mr. Boyd’s Assertions Regarding the Thresher Wind***  
2                            ***Agreement***

3           Q.     **Please summarize Mr. Boyd’s assertions with respect to the Thresher Wind**  
4   **Agreement.**

5           A.     Throughout Mr. Boyd’s testimony he repeatedly conflates the contractual  
6   obligations of Thresher Wind, LLC (“Thresher Wind”) with those of Grain Belt Express and  
7   Invenergy.<sup>11</sup> In doing so, Mr. Boyd argues that it is unreasonable for Grain Belt Express to propose  
8   a transmission line in violation of the Thresher Wind Agreement.<sup>12</sup>

9           Q.     **Who is Thresher Wind?**

10          A.     Thresher Wind is a renewable energy developer, which I understand is wholly  
11   unregulated by the Commission.

12          Q.     **Is Grain Belt Express a party to the Thresher Wind Agreement?**

13          A.     No.

14          Q.     **Is Invenergy a party to the Thresher Wind Agreement?**

15          A.     As I understand it, no.

16          Q.     **Do you work for Thresher Wind?**

17          A.     No, as stated above and in my Direct Testimony, my employer is Invenergy LLC  
18   (“Invenergy”), which is an affiliate of Grain Belt Express and Thresher Wind. Invenergy provides  
19   services to Grain Belt Express through an Administrative Services Agreement. My time is fully  
20   allocated to Grain Belt Express. Thresher Wind has a separate team and I do not perform any work  
21   for Thresher Wind.

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<sup>11</sup> See generally *id.* at pp. 2–5.

<sup>12</sup> *Id.* at p. 2.

1           **Q.     How long has Grain Belt Express possessed a certificate of convenience and**  
2 **necessity (“CCN”) for the construction of AC collector lines?**

3           A.     Grain Belt Express has possessed a CCN from this Commission for the Grain Belt  
4 Express Project, including the AC Collector System, since 2011.

5           **Q.     Would it be appropriate for the routing process in this case to exclude parcels**  
6 **that have contracts with separate legal entities?**

7           A.     No. This case addresses Grain Belt Express’ routing process for two AC Collector  
8 Lines, which form part of the AC Collector System, which has been a part of the Grain Belt Express  
9 Project since 2011. It would be inappropriate to incorporate agreements by separate and distinct  
10 legal entities into this routing process. The purpose of the routing process is to find the most  
11 suitable route for the AC Collector Lines based on certain routing principles, as explained in the  
12 Direct Testimony of Jamie Precht.<sup>13</sup> Staff witness Paul Owings praised the routing principles as  
13 “comprehensive” and the resulting alternate route network as “reasonable.”<sup>14</sup> Arbitrarily avoiding  
14 parcels for reasons unrelated to the routing principles would result in suboptimal routing  
15 alternatives that would have greater impacts on landowners, agricultural production, and the  
16 environment. This would raise questions about the integrity and reliability of the Routing Study.

17           ***B.     Response to Mr. Boyd’s Assertions Regarding Notice***

18           **Q.     With respect to notice, can you please summarize Mr. Boyd’s assertions?**

19           A.     Mr. Boyd asserts that he “never heard anything from Invenergy or Thresher Wind  
20 until [he] received the public hearing notice letter in the second half of June 2024.”<sup>15</sup>

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<sup>13</sup> Direct Testimony of Jamie Precht, pp. 9-10 (May 31, 2024) (“Precht Direct Testimony”).

<sup>14</sup> Owings Direct Testimony, pp. 20-21.

<sup>15</sup> *Id.* at p. 3.

1           **Q.     How do you respond?**

2           A.     Mr. Boyd would not have heard from Invenergy or Thresher Wind regarding the  
3 Grain Belt Express Project because the Project is not associated with those corporate entities. If  
4 Mr. Boyd intended to refer to Grain Belt Express, then his assertion is factually incorrect.

5           As with all landowners, Mr. Boyd was mailed an invitation to the open houses the week of  
6 February 8, 2024.<sup>16</sup> The postcards referred interested landowners to the project website,  
7 KansasACCollector.com, and provided a project email address Connect@kansasaccollector.com,  
8 so that landowners could learn more about the AC Collector Lines and contact the Routing Team  
9 in advance of the open houses. As explained in the Application and supporting Direct Testimony,  
10 Grain Belt Express has taken great pains to ensure that all landowners and other stakeholders have  
11 ample notice and input in the routing process—even over and above the statutory requirements.<sup>17</sup>

12           **Q.     Does this mean that Mr. Boyd had the opportunity to provide feedback on the**  
13 **siting of the AC Collector Line Proposed Routes?**

14           A.     Yes. Mr. Boyd was invited to participate in the open house and public engagement  
15 in February of 2024. If Mr. Boyd elected not to participate in the public engagement process that  
16 was his prerogative, but he cannot now reasonably claim that he never heard from Grain Belt  
17 Express prior to receiving notice of the local public hearing on July 10, 2024.

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<sup>16</sup> All mailings pertaining to this proceeding were sent to Boyd Farms, Inc. c/o Brad Boyd, Bradley B. Boyd Trust, and Sandra Boyd Trust to the same address in Meade, Kansas. *See* Direct Testimony of Emily Hyland, Exhibit EH-4, (May 31, 2024) (“Hyland Direct Testimony”).

<sup>17</sup> *See, e.g., id.* at pp. 4-12 (describing “several opportunities for public input, including a series of in-person public open houses, a virtual public open house, and direct landowner communication”); Precht Direct Testimony, pp. 13-14 (describing outreach to federal, state, and local agencies).

1                   **C.     Alternative Route Proposals**

2           **Q.     Is the alternative route proposed in Mr. Boyd’s Direct Testimony feasible?**

3           A.     No. The alternative route proposed in Mr. Boyd’s Direct Testimony (“Boyd  
4   Alternative 1”) would impact 46 parcels that did not receive notice of the Line Siting Application.  
5   Additionally, as explained in the Rebuttal Testimony of Jaimie Precht, Boyd Alternative 1 creates  
6   numerous social, environmental and engineering issues, which make the route infeasible.

7           **Q.     Did Mr. Boyd propose any other alternative routes?**

8           A.     Yes. Mr. Boyd proposed another alternative to the KCC Staff at the local public  
9   hearing in Dodge City on July 10, 2024 (“Boyd Alternative 2”). Mr. Boyd then circulated an e-  
10   mail to Grain Belt Express on July 12, 2024 summarizing Boyd Alternative 2.

11          **Q.     Is the other alternative proposed by Mr. Boyd feasible?**

12          A.     No. Ms. Precht’s Rebuttal Testimony also explains that Boyd Alternative 2 suffers  
13   from similar social, environmental, and engineering issues as Boyd Alternative 1.

14          **Q.     Has Grain Belt Express tried to find another solution to address Mr. Boyd’s**  
15   **concerns regarding impact on farming operations and proximity to residences?**

16          A.     Yes. We have identified a potential alternative route (the “Grain Belt Alternative”)  
17   that turns north just north of the intersection of 16 Road and C Road in Meade County. The Grain  
18   Belt Alternative continues north for approximately one mile before making a slight angle to the  
19   northeast, ultimately continuing east again through Mr. Boyd’s property until it reaches Highway  
20   23 approximately one mile north of Mr. Boyd’s residence. While suboptimal from a routing  
21   perspective—it adds several additional angle structures, introduces a more challenging stream  
22   crossing, and traverses open farmland away from property lines—the Grain Belt Alternative

1 represents a potentially viable option to address Mr. Boyd's concerns within the context of this  
2 siting application.<sup>18</sup>

3 **Q. Is further work required to confirm whether the Grain Belt Express**  
4 **Alternative is feasible?**

5 A. Yes. Given the crossing of Crooked Creek and potential presence of threatened  
6 wildlife, Grain Belt Express would need to confer with local wildlife officials and conduct  
7 additional desktop and field research to confirm the feasibility of the Grain Belt Alternative.  
8 Additionally, Grain Belt Express will need to have further discussions with the Boyds and other  
9 nearby landowners.<sup>19</sup> Should any unworkable issue related to environmental, engineering, or  
10 landowner challenges arise, Grain Belt Express would need to abide by the Proposed Route.

11 **Q. What authority does Grain Belt Express request from the Commission with**  
12 **regard to the Grain Belt Alternative?**

13 A. If the Boyd representatives are agreeable, Grain Belt Express is committed to  
14 thoroughly reviewing the Grain Belt Alternative in good faith but maintains its request that the  
15 Commission approve the Proposed Route. Grain Belt Express further requests that the  
16 Commission grant authority to switch to the Grain Belt Alternative if additional landowner  
17 discussions, as well as additional environmental and engineering review, establish that the Grain  
18 Belt Alternative is feasible.

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<sup>18</sup> Although the Boyds have indicated that the Grain Belt Alternative is not acceptable, we presume (based on Mr. Boyd's Direct Testimony and additional discussions) that it is still preferable to the Boyds when compared to the Proposed Route. For the reasons explained here and in Ms. Precht's Rebuttal Testimony, the Grain Belt Alternative is the only potentially viable option other than the Proposed Route.

<sup>19</sup> In addition to the Boyds, one of the impacted landowners received notice of the Line Siting Application, but for a parcel other than the one impacted by the Grain Belt Alternative.



1       **VI.    CONCLUSION**

2           **Q.     Does this conclude your testimony?**

3           **A.     Yes, it does.**

### **VERIFICATION**

I, Kevin Chandler, do solemnly, sincerely and truly declare and affirm that I am a Director of Transmission Business Development for Invenenergy Transmission, LLC, that I have read the foregoing testimony 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: /s/ Kevin Chandler  
Kevin Chandler

July 26, 2024

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served upon the parties listed below by email or U.S. mail, postage prepaid, this 26th day of July, 2024.

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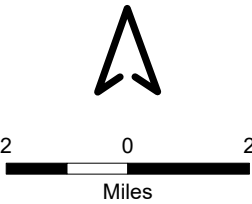
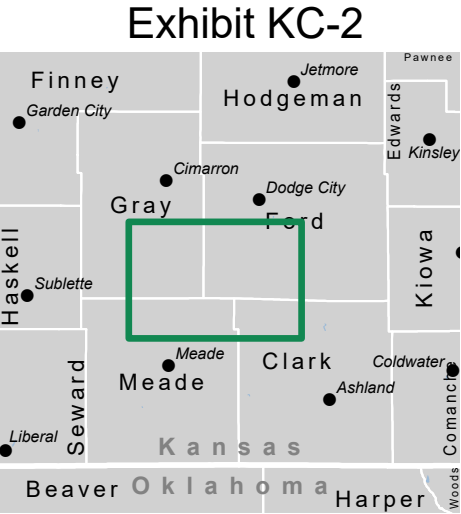
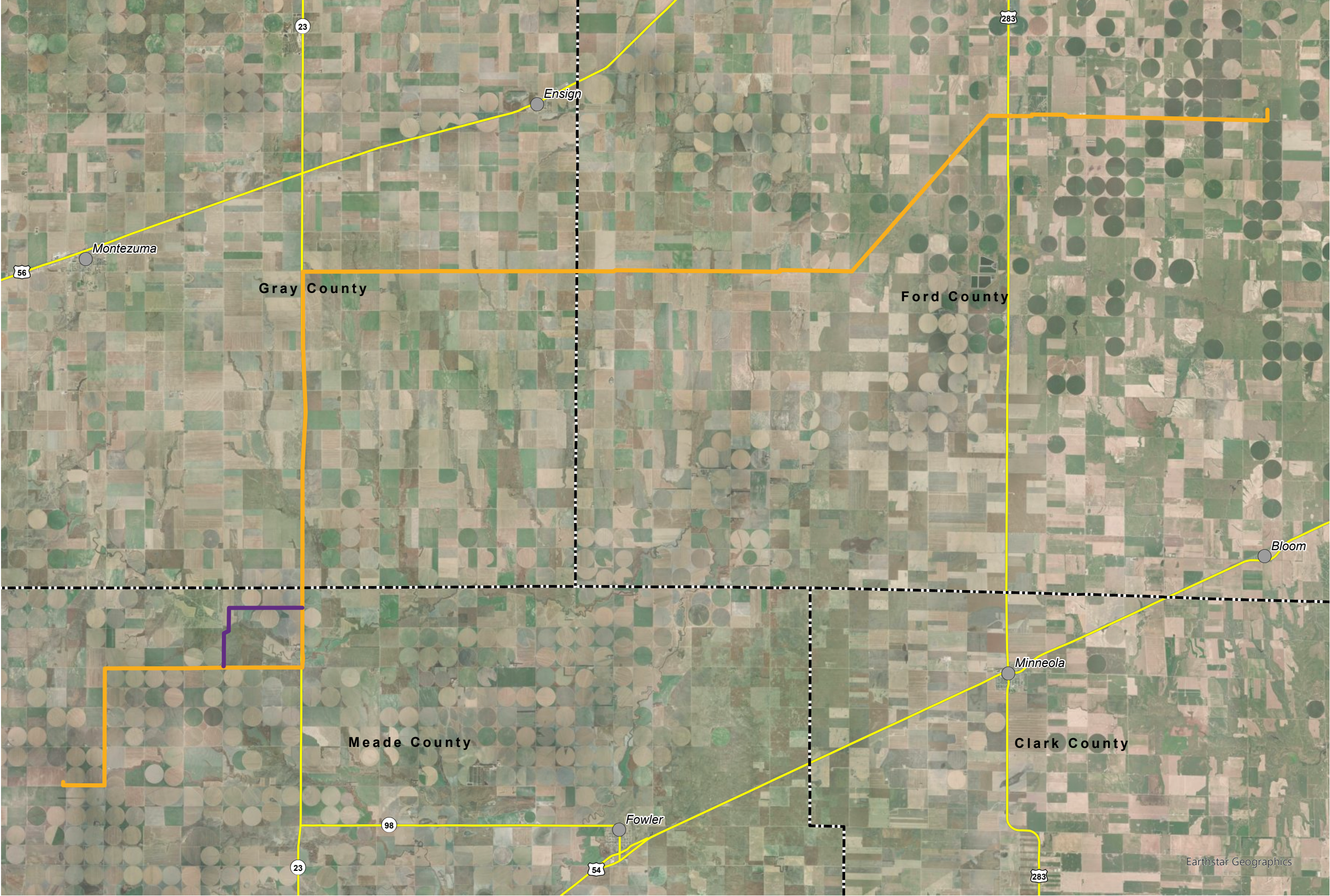
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*/s/ Anne E. Callenbach*

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- Legend**
- City
  - AC Collector Transmission**
    - Proposed Mead-Dodge City Route
    - Alternative Mead-Dodge City Route
  - Road Classification**
    - US/State Route
    - County Boundary

# Kansas AC Collector Transmission

Meade, Gray, & Ford Counties, Kansas

July 26, 2024



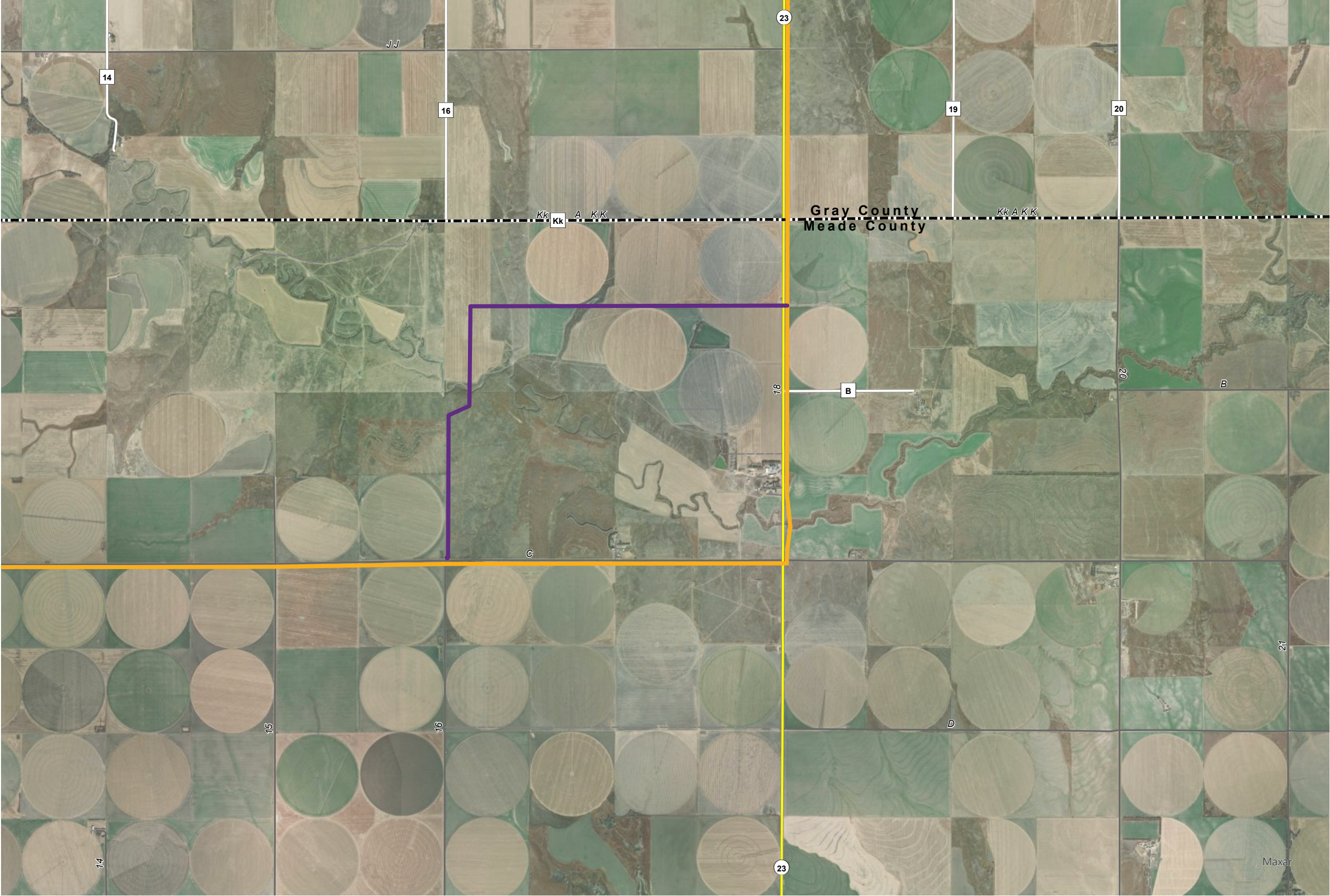
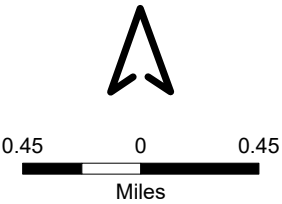


Exhibit KC-2



- Legend**
- City
  - AC Collector Transmission**
    - Proposed Mead-Dodge City Route
    - Alternative Mead-Dodge City Route
  - Road Classification**
    - US/State Route
    - County Road
    - Local Road
    - Dirt/Unpaved Road
    - County Boundary

# Kansas AC Collector Transmission

Meade, Gray, & Ford Counties, Kansas

July 26, 2024