

**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-790-STG
Lines and Associated Facilities through)
Gray, Meade, and Ford Counties, Kansas.)

**TESTIMONY OF
KEVIN CHANDLER
ON BEHALF OF
GRAIN BELT EXPRESS LLC
SUPPORTING MOTION TO MODIFY SITING ORDER**

March 14, 2025

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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, Suite
5 1800, Chicago, Illinois 60606.

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

12 A. The purpose of my testimony is to support the Motion to Modify Siting Order
13 (“Motion”) filed by Grain Belt Express, LLC (“Grain Belt Express”) in Docket No. 24-GBEE-
14 790-STG. The Motion seeks two modifications to the Order on Siting Application (“Siting Order”)
15 issued by the Kansas Corporation Commission (“Commission”) on September 26, 2024. First, the
16 Motion seeks authority to shorten the proposed route for the Meade Line (as that term is defined
17 below). Second, the Motion seeks relief from certain conditions that were included in the Siting
18 Order which will be rendered moot if the Commission approves the shorter route for the Meade
19 Line.

20 **Q. Are you sponsoring any exhibits as a part of your testimony?**

21 A. Yes, I am sponsoring the following exhibits:

- 22 • Exhibit KC-1 – Map of Original and Shortened Meade Route
23 • Exhibit KC-2 – Map of Shortened Meade Route

1 **II. PROPOSED ALTERNATIVE ROUTE**

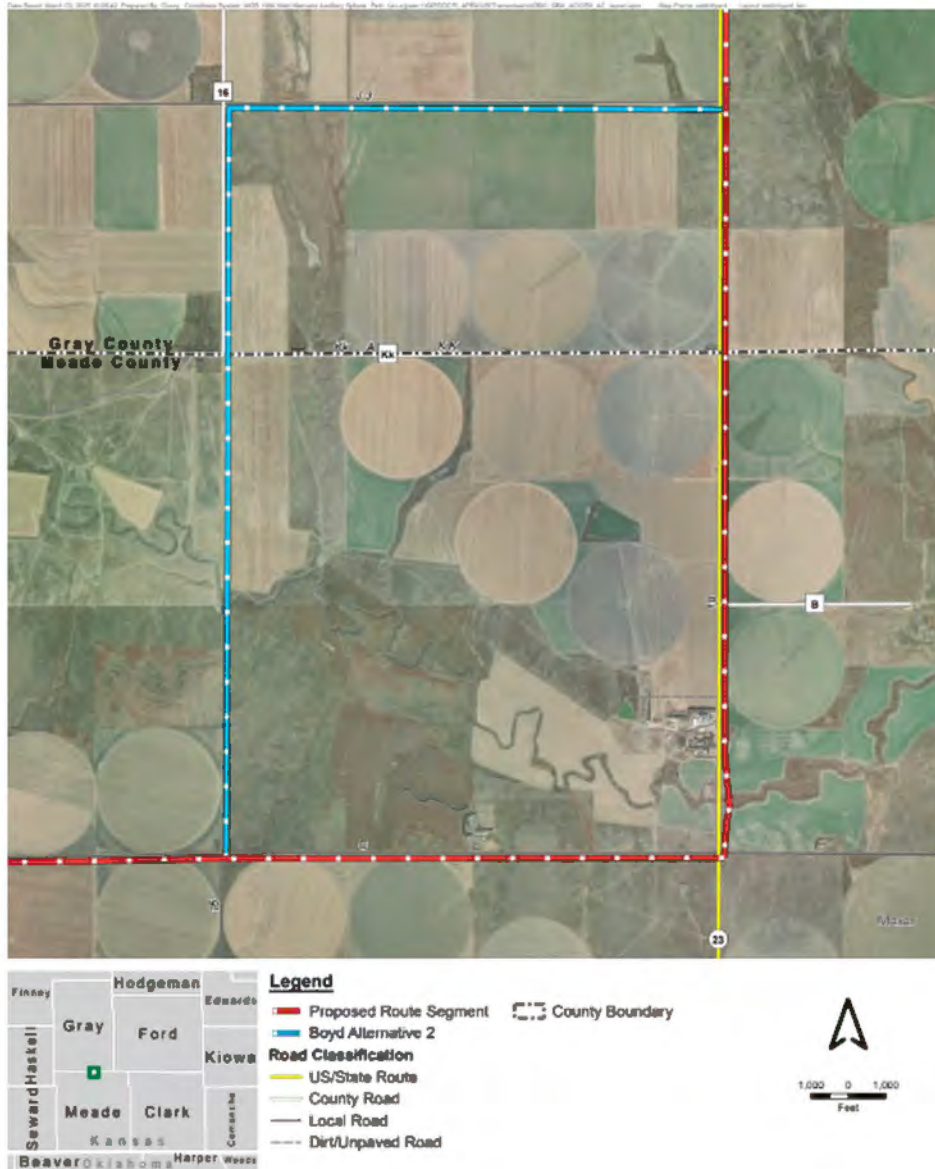
2 **Q. Can you please summarize the relevant portions of the Siting Order?**

3 A. Yes. Subject to certain conditions, the Siting Order approved Grain Belt Express’
4 application for a siting permit establishing the route for two interrelated transmission lines and
5 associated facilities as part of the previously Commission-approved alternating current (“AC”)
6 Collector System. The proposed interrelated transmission lines include: a double-circuit 345 kV
7 AC transmission line of approximately 46 miles long, across portions of Gray, Meade, and Ford
8 Counties (the “Meade Line”), and (2) a single or double-circuit 345 kV AC transmission line of
9 approximately 16 miles long, traversing a portion of Ford County (the “Bucklin Line”). One of
10 the conditions in the Siting Order required Grain Belt Express to develop a supplemental routing
11 analysis for a certain segment of the Meade Line.

12 **Q. Can you provide further detail regarding the condition that required Grain**
13 **Belt Express to conduct a supplemental routing analysis?**

14 A. Yes. Pursuant to Siting Order, Grain Belt Express was ordered to develop a
15 supplemental routing analysis comparing two alternatives for a segment of the Meade Line. At the
16 time of the Siting Order, the two options were to either keep the Meade Proposed Route (the
17 “Proposed Route Segment”) or to follow an alternative presented by intervening parties referred
18 to as the “Boys.”¹ The alternative path presented by the Boyds is referred to as the “Boyd
19 Alternative 2.” The map below shows the Proposed Route Segment (in red) and the Boyd
20 Alternative 2 (in blue).

¹ The “Boys” include intervenors Bradley B. Boyd and Sandra A. Boyd, Co-Trustees of the Bradley B. Boyd Revocable Trust dated August 23, 2011; Sandra A. Boyd and Bradley B. Boyd, Co-Trustees of the Sandra A. Boyd Revocable Trust dated August 23, 2011; Bradley B. Boyd and Ellen L. Verell, Co-Trustees of the Ellen L. Verell Revocable Trust dated January 24, 2012, Down Home, Inc.; and Boyd Farms, Inc.



- 1
- 2 The Siting Order was conditioned on Grain Belt Express' continued investigation into the
- 3 Proposed Route Segment and the Boyd Alternative 2, which would be memorialized in a routing
- 4 analysis comparing those two options. The Commission would then review the routing analysis
- 5 under K.S.A. 66-1,177 *et seq.*

1 **Q. Has Grain Belt Express found a suitable route that addresses the Boyds’**
2 **concerns?**

3 A. Yes, we have found an alternative path forward that solves the Boyds’ concerns. In
4 the course of investigating the relative benefits of the Proposed Route Segment and the Boyd
5 Alternative 2, Grain Belt Express also looked for other, creative ways to address the Boyds’
6 concerns. The eventual product of that creativity was to explore sites for the switchyard that will
7 serve as the Meade Origination Point that are north of the Boyds’ property. By shifting the
8 switchyard location, the Meade Line can be built without traversing the Boyds’ land.

9 **Q. Did Grain Belt Express find a suitable location for the switchyard north of the**
10 **Boyds’ property?**

11 A. Yes. Grain Belt Express found an alternative location for the switchyard, which
12 will be at the southern end of the Shortened Meade Route as shown on **Exhibit KC-2**. Grain Belt
13 Express entered voluntary negotiations with the landowner who currently owns the property that
14 will host the alternative switchyard location and executed a binding purchase option for that land.
15 If the switchyard that serves as the Meade Origination Point is moved to this alternative location,
16 it will shorten the Meade-Dodge City Line by approximately 12 miles and remove 24 parcels from
17 the route, including the Boyds’ parcels. We refer to this option as the “Shortened Meade Route.”
18 The Shortened Meade Route would be approximately 33 miles, compared to the originally
19 proposed 46 miles.

20 **Q. Are other landowners negatively impacted by the Shortened Meade Route?**

21 A. No. The Shortened Meade Route utilizes the approved portions of the Meade
22 Proposed Route and does not impact any landowners that were not already on the Meade Proposed

1 Route. The Shortened Meade Route reduces the amount of land impacted by easements,
2 transmission line infrastructure, and intangible impacts to sightlines and habitats.

3 **Q. Has Grain Belt Express shared their plans to shorten the Meade-Dodge City**
4 **Line with the Boyds?**

5 A. Yes, we shared our plans with the Boyds through their counsel. The Boyds have
6 indicated that they are in favor of the Shortened Meade Route. We have also made Commission
7 Staff aware of the Shortened Meade Route and Staff is supportive of the Shortened Meade Route.

8 **III. PROPOSED MODIFICATION TO SITING ORDER CONDITIONS**

9 **Q. What conditions from the Siting Order does Grain Belt Express seek to**
10 **modify?**

11 A. The Siting Order contains conditions reflective of what was a binary, disputed
12 choice between the Proposed Route Segment and the Boyd Alternative 2. These conditions
13 include:

- 14 • that Grain Belt Express produce a routing analysis comparing the two routes;
- 15 • that legal notice be sent to landowners impacted by Boyd Alternative 2;
- 16 • that a public hearing be held for the landowners impacted by Boyd Alternative 2 or the
17 relevant portion of the Meade Proposed Route; and
- 18 • that Commission ultimately engage in an evidentiary hearing to determine which of the
19 two routes should be adopted.

20 **Q. Are these conditions necessary if the Commission modifies the Siting Permit**
21 **to allow for the Shortened Meade Route?**

22 A. No, they are not. The purpose of these conditions was to allow the parties and the
23 Commission sufficient time and opportunity to investigate the strengths and weaknesses of two

1 routes that related to an unresolved conflict between the Boyds and Grain Belt Express and to
2 ensure that due process was provided to parties that would be affected if Boyd Alternative 2 was
3 adopted. If the Commission approves the Shortened Meade Route, the Meade Line will not reach
4 the Boyds’ property and the conditions related to the Boyd Alternative 2 are moot. Accordingly,
5 the Motion requests that the Commission issue an order waiving these conditions.

6 **IV. TESTIMONY IN FAVOR OF APPROVING THE SHORTENED MEADE**
7 **ROUTE**

8 **Q. What did the Commission find with respect to the necessity for and the**
9 **reasonableness of the location of the Meade Proposed Route?**

10 A. The Commission found that the proposed line was necessary and that it “would
11 provide benefits to electric customers both inside and outside of Kansas and economic
12 development benefits in Kansas.”² The Commission found the Proposed Meade Route reasonable
13 because it was the product of a comprehensive routing study that utilized reasonable study areas
14 and selection methodologies.³

15 **Q. Are the Commission’s prior findings altered by the proposed modification?**

16 A. No. Regarding necessity, the shortening of the route does not impact the reason the
17 line is being built, which is to connect generation assets to Grain Belt Express’ multi-state HVDC
18 line. Grain Belt Express has evaluated its interconnection queue, and the adjusted switchyard
19 location will be a suitable point of interconnection. Regarding the reasonableness of the route, the
20 Shortened Meade Route does not deviate from the Meade Proposed Route that was the product of
21 the routing study—it merely uses less of the route than originally contemplated. The Shortened

² Siting Order at ¶ 35.

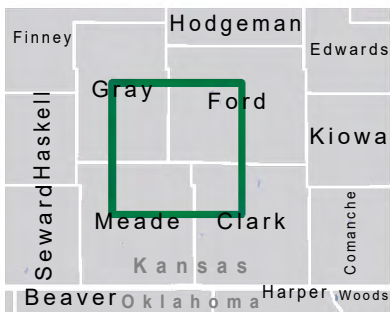
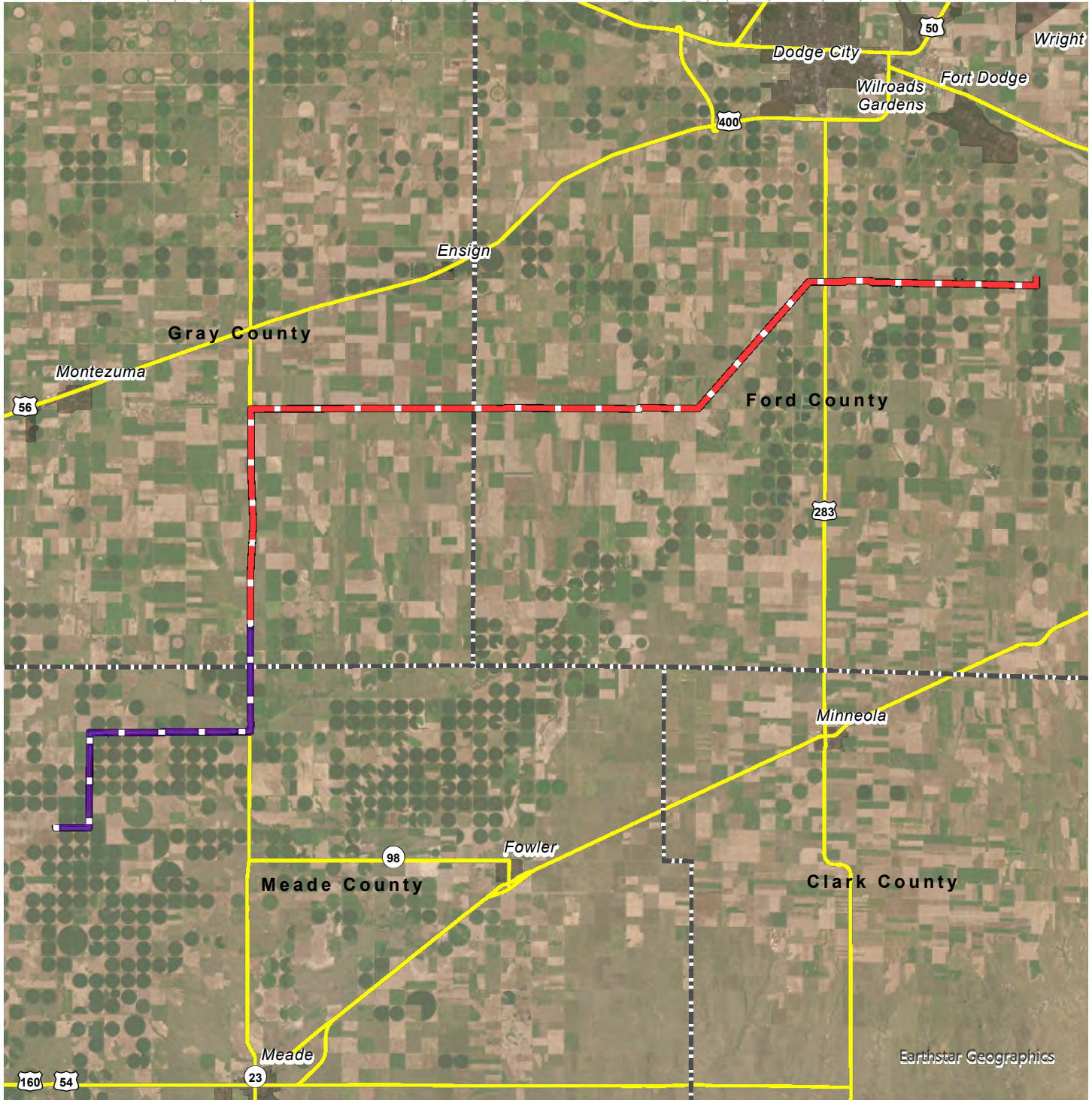
³ *Id.* at ¶ 36-37.

1 Meade Route is an improvement upon the Proposed Route because it shortens the overall length
2 of the route and overall impact of the line and furthers the goal of encouraging cooperation between
3 developers and landowners who may be impacted by transmission development.

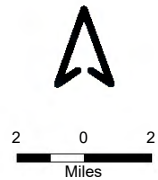
4 **V. CONCLUSION**

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

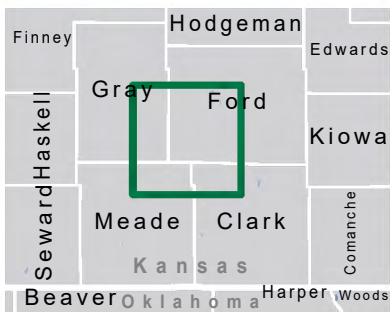
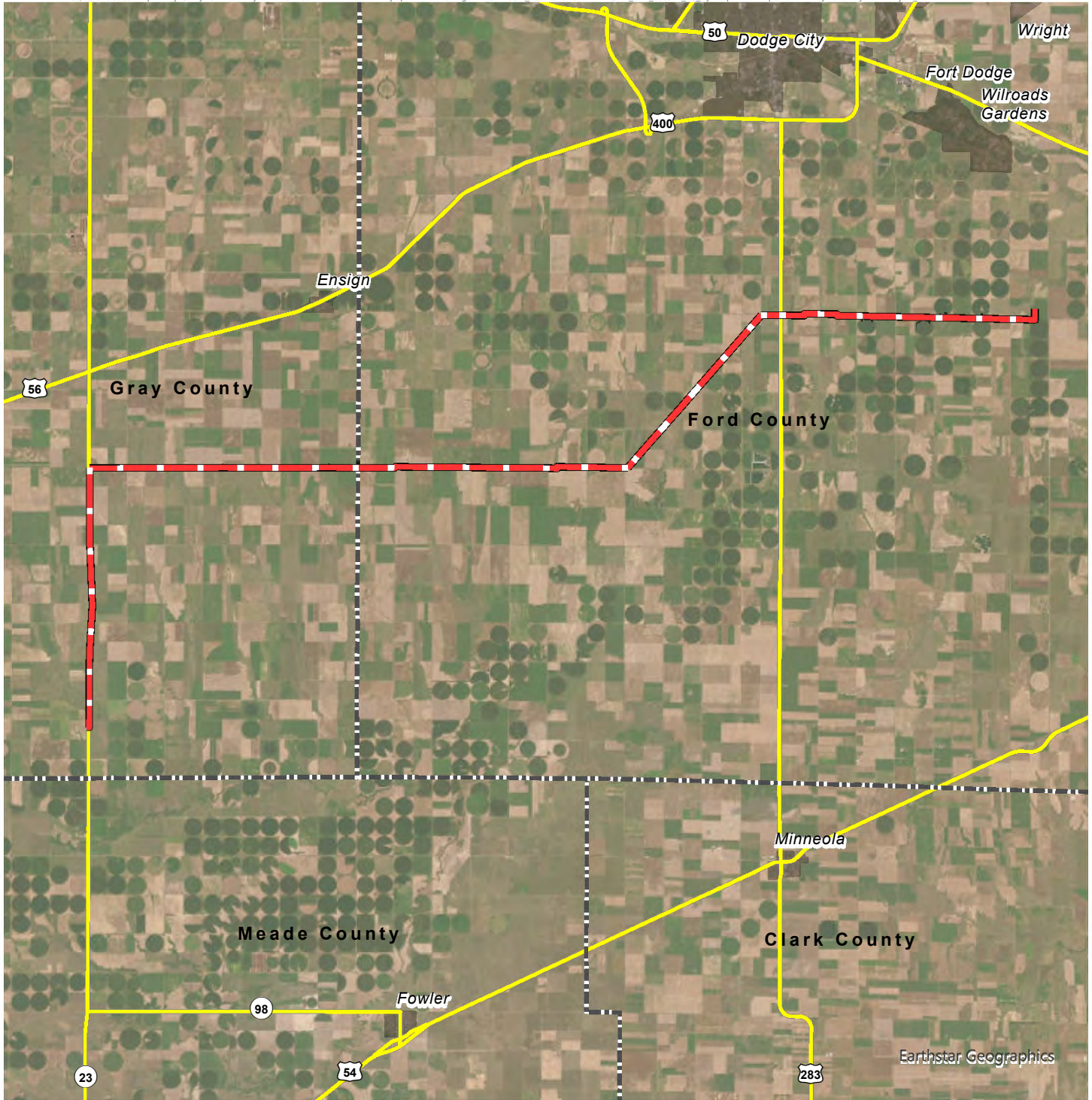
6 **A. Yes, it does.**



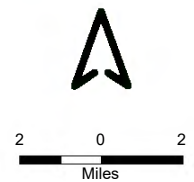
- Legend**
- Original Meade Route
 - Shortened Meade Route
 - Road Classification**
 - US/State Highway
 - County Boundary
 - Municipal Boundary



Route Comparison



- Legend**
- Shortened Meade Route
 - Road Classification**
 - US/State Highway
 - County Boundary
 - Municipal Boundary



Route Overview