

**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.)

NOTICE OF FILING OF PUBLIC COMMENTS

The Office of General Counsel for the State Corporation Commission of the State of Kansas (the “Commission”) files the attached report summarizing the public comments received by the Office of Public Affairs and Consumer Protection in this Docket. This filing is for informational purposes only, and no Commission action is required at this time.

WHEREFORE, the Office of General Counsel submits this filing for Commission review and consideration and for such other relief as the Commission deems just and equitable.

Respectfully submitted,

/s/ Kyler C. Wineinger

Kyler C. Wineinger, #28518
Assistant General Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
Phone: (785) 271-3109
Fax: (785) 271-3354
kyler.wineinger@ks.gov

1500 SW Arrowhead Road
Topeka, KS 66604-4027



Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Laura Kelly, Governor

MEMORANDUM

To: Lynn Retz
Executive Director

From: Linda Berry, Director
Public Affairs and Consumer Protection

Date: July 23, 2024

Re: Public Comments
Docket No. 24-GBEE-790-STG

Attached is the report summarizing comments received by the Office of Public Affairs and Consumer Protection (PACP) in Docket No. 24-GBEE-790-STG, in the Matter 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.

There were 13 comments received by letter, phone email or via website between May 31, 2024 and July 15, 2024. The comment period ended on July 15, 2024.

Copies of the summary and comments received are attached and designated as "Attachment A."

I request the Office of the General Counsel file the comment memo and supporting materials into the docket.

Cc: Brian Fedotin
General Counsel

Attachment “A”

Public Comment Totals

Docket No	Total Comments	Total Signatures	Total Count
24-GBEE-790-STG	13	0	13
Totals	13	0	13



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128727**
Date Filed **7/1/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H	Consumer Class: R
Name	Patrick Doyle	Home Phone	
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2		Fax	
City, State, Zip	Topeka,	Email	
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	S	Signatures
Narrative			
7/1/2024	The Grain Belt Express is necessary to carry wind and solar power to metro areas. Concerns over noise and flying wildlife are minor in comparison to benefits.		



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128738**
Date Filed **7/1/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: P	Consumer Class: R
Name	MICHAEL MOORE	Home Phone	3162265819
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	905 E. BROADWAY	Fax	
City, State, Zip	NEWTON, 67114	Email	mrmks1954@gmail.com
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	S	Signatures
Narrative			
7/1/2024	Hello: I support the Grain Belt LLC request to approve the two transmission lines needed to enable their solar and wind energy project in the Meade area. I have a sister who lives in Fowler, KS (a few miles away from Meade) and she is also in support of this.		



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128740**
Date Filed **7/2/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H	Consumer Class: R
Name	Yazmin Rivera	Home Phone	6203913821
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	401 Academy CT	Fax	
City, State, Zip	Liberal, 67901	Email	yazminarivera2477@gmail.com
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	O	Signatures
Narrative			
7/2/2024	How will this benefit Kansans? What is the company's plan in regards to social responsibility? What can they do to benefit the western Kansas communities. This project seems it will only benefit Illinois. I am opposed due to this project not benefiting Kansas communities. Western Kansas seems it is being used for its land without any benefits of improving our livelihoods or any benefit whatsoever. This large company will benefit another state and other communities. This is not a community friendly project and does not have our best interest in Kansas.		



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128828**
Date Filed **7/10/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H		Consumer Class: R	
Name	Vicki Hada	Home Phone	6202534808		
Business		Mobile Phone			
Street Address1		Work Phone			
Street Address 2	23306 CC Rd	Fax			
City, State, Zip	Ensign, 67841	Email	vhada@ucom.net		
Docket Opinion					
Company ID	Docket Number	Consumer Opinion	Number of Petitions		
GBEE	24-GBEE-790-STG	O	Signatures		
Narrative					
7/10/2024	<p>My family and I reside at 23306 CC Rd, Ensign, KS. I see that your proposed route for the Grain Belt Express Meade-Dodge City line runs right along CC Road in front of our house. We strongly protest this route. We have pets (cats, dogs and chickens) whose safety and comfort would be jeopardized by the traffic of your construction equipment. We also enjoy on our property and neighboring property a wide variety of wild animals and birds (including killdeer) whose habitat would be disturbed by your construction. We have lived here for over 35 years. We enjoy the quiet peace of our country home, and we certainly don't want that peace destroyed by your construction activities, nor do we want our view destroyed by giant poles and lines after the construction is complete. This is likely to decrease the value of this property, and while we rent rather than own, I'm sure the owner of this property would not appreciate these financial consequences. We're very concerned about the possible health risks of exposure to electromagnetic fields resulting from living so near a large power line. We're also concerned about the potential for interference with our electronic equipment. CC Road is unpaved and narrow, and county maintenance is already less than ideal. Your proposed construction would bring increased traffic—including heavy equipment—which would cause road damage and obstructions, making my commute to work in Dodge City more difficult and time-consuming. We appreciate the need for progress, but in this case we fall into the "Not In My Back Yard" category. Please use an alternate route which avoids CC Road.</p>				

128828

128828



Submit a Public Comment

Docket No. 24-ZGBEE-790-STG

The Kansas Corporation Commission is accepting comments through July 15, 2024, 5pm.
By completing this form you will be providing comment that will be entered into the record. Comments are reviewed and considered by the Commission prior to a final order being issued in the case.

Information provided will be made public as part of the case docket.

*How long have you been a customer of the applicant?

☐ 0-5 years ☐ 6-10 years ☐ 11-15 years ☒ More than 15 years ☐ Not a customer

*Opinion: ☐ Support ☒ Oppose ☐ Neutral

*First name: Vicki Middle initial: L. *Last name: Hada

Street: 23306 CC Road *City: Ensign *State: KS Zip: 67841

Phone: 620-253-4808 Email: vhada@ucom.net

Comment: My family and I have resided at the above address since 1985.

The applicant's proposed route for the Grain Belt Express Meade-Dodge City line runs right along CC Road (Gray County) in front of our house. We strongly oppose this route. We have pets (cats, dogs, chickens) whose safety and comfort would be jeopardized by the traffic of the construction equipment. We enjoy on our property and the surrounding area a wide variety of wild animals and birds (including killdeer) whose habitat would be disturbed by the construction. We enjoy the peace and quiet of our country home, and we don't want that peace destroyed by construction activities, nor do we want our view spoiled by giant poles and lines. Property values would likely be decreased by the proximity of these poles + lines. We're also very concerned about the possible health risks connected to living so near these lines. We're also concerned about the potential for →

*Denotes a required field. Only one submission per person will be recorded.

Please note: By submitting comments to the Commission, you are authorizing the Commission to make your comments and any included information publicly available.

#128828

~~#128765~~

interference with our electronic equipment. CC Road is unpaved and narrow, and county maintenance is already less than ideal. This proposed construction would bring increased traffic — including heavy equipment — which would cause road damage and obstructions, making my commute to work in Dodge City more difficult and time-consuming.

We appreciate the need for progress, but in this case we fall in the "Not In My Front Yard" category.

Please use an alternate route which avoids CC Road in Gray County.

RE: Parcel # 1762300000000300A



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128845**
Date Filed **7/11/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: P		Consumer Class: R	
Name	DARRELL BLEW	Home Phone	6203381658		
Business		Mobile Phone			
Street Address1		Work Phone			
Street Address 2	11805 112RD	Fax			
City, State, Zip	DODGE CITY, 67801	Email	d_blew@hotmail.com		
Docket Opinion					
Company ID	Docket Number	Consumer Opinion	Number of Petitions		
GBEE	24-GBEE-790-STG	O	Signatures		
Narrative					
7/11/2024	<p>Commissioners, I was not able to be at the hearing but was at the open house for the project 24-GBEE-790-STG. I am a landowner and home owner in the proposed siting of this transmission line. The proposed compensation invenergy proposes is not nearly enough for us giving this easement forever. The biggest problem I have though is this power line is 500 feet from the front door of my house.Why in the world would I want to view this for the rest of my life. My request from you commissioners is this,If you wouldn't approve this siting in front of your home please don't approve it for myself and my wife. We have lived at this location for 44 years. Wiith emminant domain on the side of invenergy we as land and home owners don't have much of a choice. You are our protection from these large companies pushing their weight around. Please force invenergy to consider an alternative route. I extend an open invitation to all of you to come view this and others in the proposed siting that are having the same issues. Thank you for your consideration. Darrell Blew</p>				

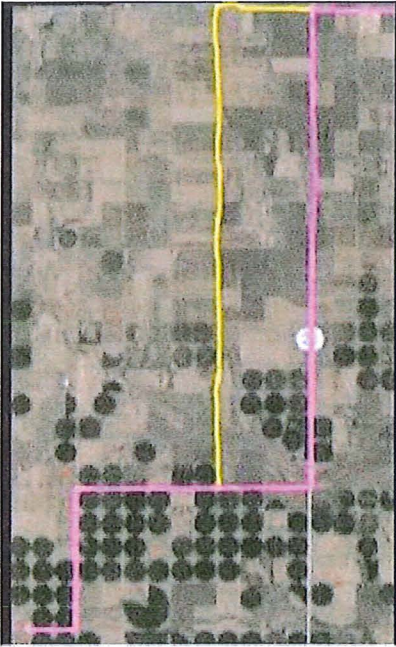


Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128853**
Date Filed **7/11/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: P	Consumer Class: R
Name	BARBARA PARKER	Home Phone	6203520862
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	17006 C RD	Fax	
City, State, Zip	MEADE, 67864	Email	freidacow@hotmail.com
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	O	Signatures
Narrative			
7/11/2024	<p>My name is Barbara Parker. I reside at 17006 C Rd Meade, Kansas.</p> <p>I appreciate that homes were taken into consideration during route planning for the transmission line but perhaps mine was overlooked?</p> <p>Until the week of July 7th I was not certain EXACTLY where the line would be located. The current plan would place it approximately 150 ft. from my front door,</p> <p>Over the years, through that very front door, have walked my Grandfather, my Father, me and now my daughter Kate. Four generations of Farmers and Ranchers.</p> <p>So I am asking Invenergy to work with me through perhaps an alternative route or micro sighting and that the Kansas Corporation Commission insures micro sighting is used if an alternate route is not chosen.</p> <p>I support the attached alternative route with .Invenergy shown in pink and yellow depicting an alternate route through fewer irrigation circles, homesteads and on better county roads.</p> <p>Thank You, Barbara Parker</p> <p>PS. I was unable to attach route map so will attempt to send separately.</p>		

128853





Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128866**
Date Filed **7/12/2024**
Investigator **SEISENBA**

Account Information		Notified KCC by: P	Consumer Class: R
Name	MOLLIE MEASE	Home Phone	
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2		Fax	
City, State, Zip	MARBLE FALLS, TX	Email	
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	O	Signatures
Narrative			
7/12/2024	Please see attached comment.		

#128866



Submit a Public Comment

Docket No. 24-ZGBEE-790-STG

July 15, 2024, 5pm

The Kansas Corporation Commission is accepting comments through _____.

By completing this form you will be providing comment that will be entered into the record. Comments are reviewed and considered by the Commission prior to a final order being issued in the case.

Information provided will be made public as part of the case docket.

*How long have you been a customer of the applicant?

Owned the Property since 1985.

☐ 0-5 years ☐ 6-10 years ☐ 11-15 years ☐ More than 15 years ☐ Not a customer

*Opinion: ☐ Support ☒ Oppose ☐ Neutral

*First name: Mollie Middle initial: K *Last name: Mease

Street: 500 E. Oak Ridge Drive *City: Marble Falls *State: Tx Zip: 78654-4012

Phone: 830-613-0018 Email: mmease@tstar.net

Comment: Property identification: 17623000000300A, 17623000000300B and 178270000001000.

I strongly disagree with the location of the power transmission line just across the road from a family residence. This is currently rental property and the same person have been there since 1985. The house faces the road and the power line will make it much less desirable for them. They have pets, chickens and love the wildlife (deer, pheasants, quail, birds, etc). A large powerline so close to a residence makes it less valuable and will be harder to rent, in addition to reducing value. (Property 17623000000300A)

Property 178270000001000 - Line from Power line follows road on this property. It will be difficult to farm under the line and make appropriate ^{turns} in trying to farm.

*Denotes a required field. Only one submission per person will be recorded. It will also decrease property value significantly. Please find another Route!

Please note: By submitting comments to the Commission, you are authorizing the Commission to make your comments and any included information publicly available.



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128871**
Date Filed **7/13/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H	Consumer Class: R
Name	Bradley Boyd	Home Phone	6206466020
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	2119 18 Road	Fax	
City, State, Zip	Meade, 67864	Email	bboyd@unitedwireless.com
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	O	Signatures
Narrative			
7/13/2024	I want to clarify one thing about my alternative proposal.		
This would be my first choice as an alternative route:			
Turn north at the intersection of C Road/16 Road, Meade County.			
Proceed north 3 miles (one mile into Gray County).			
Turn east at the intersection of JJ Road/16 Road, Gray County.			
Proceed east along JJ Road to Highway 23 (18 Road).			
This route would add two corners for Grain Belt. I'm sure they don't like that and I don't know how much cost that adds. It passes through two miles w/o an open road. I'm sure they don't like that either. It utilizes more of the proposed route than going all the way to CC Road, which means fewer landowners to contact.			
It removes 5 residences and 12 inhabitants from the route. It adds 1 residence and 1 inhabitant, as far as I know. Brett Weller is the one living there and I believe that residence is farther from the line than the others. The farmstead at the corner of JJ Road /16 Road is not a legal residence, as far as I know. Jim McCune is the one involved there and as far as I know, he lives in Denver.			
The alternative route removes 5 center pivots from the route and adds none.			
I remain hopeful that we can achieve a reasonable compromise.			



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128873**
Date Filed **7/14/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H		Consumer Class: R	
Name	Arthur & Dawn Derstein	Home Phone	7147010611		
Business		Mobile Phone			
Street Address1		Work Phone			
Street Address 2	3735 Forest Ave	Fax			
City, State, Zip	Yorba Linda , 92886	Email	artie-dawn@sbcglobal.net		
Docket Opinion					
Company ID	Docket Number	Consumer Opinion	Number of Petitions		
GBEE	24-GBEE-790-STG	O	Signatures		
Narrative					
7/14/2024	<ul style="list-style-type: none">• Question 1: Are the Transmission line easements separate from the AC Collector System line easements?• Question 2: Is the KCC holding Invenergy accountable to providing the health risk involved with these lines to the land owners prior to them being built?• Question 3: There is public information on the number of renewable energy projects that have gone bankrupt where the landowners are left with these materials on the ground. Upon reading the rights of easement there is nothing mentioned regarding the responsibility of Invenergy to remove the materials if the project goes bankrupt, in the event that this were to happen is there insurance these structures will be removed so the ground can be put back into farming? How will the KCC protect and help manage the sustainability of the farm ground?• Question 4: The maps that were sent with the letter were generic, but it appears the AC Collector System line is running directly over a gas line. Please verify this and provide information regarding the safety hazards?• Question 5: It appears that the power station sitting on Saddle Road/near RD 117, that the AC Collector System lines will connect to was built/ installed two years ago. Why was the power station installed before the easements for AC Collector lines were secured?• Question 6: What is the KCC doing to represent the farmers who are opposed to this and the growth of agriculture in the state of Kansas?				



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128876**
Date Filed **7/15/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: P	Consumer Class: R
Name	WENDEE GRADY	Home Phone	7855876101
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	KANSAS FARM BUREAU	Fax	
City, State, Zip	MANHATTAN, 66503	Email	gradyw@kfb.org
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	N	Signatures
Narrative			
7/15/2024	Please see attached letter.		

July 15, 2024

Submitted via email to kcc.public.affairs@ks.gov

Kansas Corporation Commission
Office of Public Affairs and Consumer Protection
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027

Re: Docket No. 24-GBEE-790-STG

Dear Commissioners,

Kansas Farm Bureau (KFB) is organized in Kansas under the Cooperative Marketing Act. Established in 1919, KFB's mission is to strengthen agriculture and the lives of Kansans through advocacy, education, and service. KFB has over 106,000 members in all 105 counties in Kansas, of which members, over 30,000 are farmers and ranchers, owning and operating on land in rural Kansas. KFB represents producers across all sectors of Kansas agriculture.

KFB serves the agricultural industry and is one of the main trade associations representing Kansas farmers and ranchers. The organization functions to advocate for its members in many different forums. In the energy space, specifically, KFB has participated in matters before the KCC, FERC, and the Kansas Legislature, and has intervened in Docket 24-GIME-102-GIE, the current transmission line-siting investigation.

In Kansas, there are 45,759,319 acres of farmland, which account for 87.5% of all Kansas land.¹ More than 21 million acres in Kansas is harvested for crops and over 16 million is pastureland for grazing animals.² As the largest class of landowners and operators in the state, Kansas' farmers and ranchers are greatly impacted by transmission lines crossing the countryside. On behalf of our impacted members, we submit these comments in the current matter.

While KFB appreciates the steps and factors that Grain Belt Express (GBE) has employed to minimize some of the impacts to agricultural land, we encourage these additional steps to lessen the negative impacts to agricultural land, and its owners and operators:

¹ 2017 Census of Agriculture, by USDA National Agricultural Statistics Service, Table 8, available at https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_2_County_Level/Kansas/st20_2_0008_0008.pdf. Last accessed July 15, 2024.

² 2023 Kansas Farm Facts, by the Kansas Department of Agriculture, page 26, available at <https://www.agriculture.ks.gov/home/showpublisheddocument/166/638441481201900000>. Last accessed July 15, 2024.

1. GBE should adopt, in Kansas, landowner protocol³ and agricultural impact mitigation protocol⁴ like it has done in Missouri. These protocols not only set some minimum standards for mitigating impacts to agricultural land and operations, but also create a clear path by which landowners can raise concerns with GBE about transmission operations on their land. If GBE adopts such protocols in Kansas, we would appreciate the opportunity to provide feedback to make them more impactful in their mitigative effects, such as shortening the timeframes for mitigative actions to be completed to much less than 45 days after completion of construction of the entire line in Kansas.
2. GBE has indicated that, where irrigation systems are impacted by transmission lines, GBE will do what is necessary to “make whole” the owners and operations of those lands. We encourage GBE to hold true to that, and to take actions necessary to avoid impacting irrigation systems when possible.
3. We appreciate that routing factors are weighted to maximize distances from residences and farm businesses. When those factors do not result in avoidance of close proximity to residences and business, and in the absence of state or county standards for setbacks, we encourage GBE to adopt and follow minimum siting standards for transmission lines, such as setback requirements from residential and agricultural structures that are sufficient to minimize health and safety risks, and other impacts to those living and working near the transmission lines.
4. We appreciate that routing factors are weighted to minimize crossing cultivated land and center pivot irrigation systems. When routes are chosen that ultimately involve crossing through cultivated land and center pivot irrigation systems, GBE should take steps to minimize the impacts by locating structures outside of the reach of irrigation systems, and elevating the transmission lines to a height that is safe for farming operations to occur underneath them.
5. Transmission lines should be situated on section lines or property lines when practical.
6. As a minimum contract standard, GBE should agree to indemnify landowners for liability associated with the utility structures located on their land.
7. To the extent contemplated in the projects, guyed transmission structures, requiring guy lines, should not be utilized on private land without landowner permission.
8. Property rights of all landowners in areas developed for energy generation and transmission should be protected (for example, those directly across the road and in close proximity to transmission lines).
9. GBE should work diligently with impacted landowners to find a feasible route for the AC Collector Lines that is least impactful to the land and operations they intersect.

³ Available at: <https://grainbeltexpress.com/wp-content/uploads/2023/12/Grain-Belt-Express-Landowner-Protocol-2023-Update.pdf>, last accessed July 11, 2024.

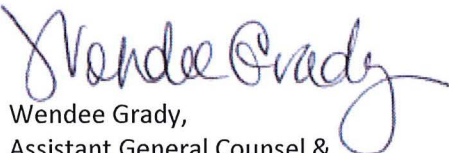
⁴ Available at: <https://grainbeltexpress.com/wp-content/uploads/2022/12/Missouri-Ag-Impact-Mitigation-Protocol-Rev-July-2020.pdf>, last accessed July 11, 2024.

10. With this docket, GBE should more precisely define the geographic region for future AC Collector lines, narrowing the region from "western Kansas" as originally contemplated in a previous docket.
11. Similar to conditions placed on the HVDC line for construction, construction of the AC Collector lines should not begin until sufficient interconnection agreements with generators have been finalized to warrant its necessity.

Additionally, in future line-siting cases for GBE's AC Collector Lines, GBE could improve upon stakeholder engagement opportunities by, for example, providing more detailed maps with clearly marked roads, so that landowners can accurately identify their property and the potential impacts of varying proposed transmission line routes. And, while we appreciate the informal "open house" style of meetings to accommodate landowner schedules, we would encourage a presentation at the beginning of the open house, even if brief, similar to that of Kevin Chandler's at the KCC public hearing in Dodge City. Doing so streamlines the delivery of the most basic information about the project, saving time and effort of all in attendance. It may also help landowners recognize potential issues or impacts of the project on their land and operations.

We appreciate the working relationship we have with the staff of the Kansas Corporation Commission, as well as GBE, and look forward to working together in the future as efforts are made to provide reliable, low-cost energy to Kansas consumers, while mitigating the impacts of transmission lines on agricultural land.

Sincerely,

A handwritten signature in blue ink that reads "Wendee Grady". The signature is fluid and cursive, with the first name "Wendee" being more prominent than the last name "Grady".

Wendee Grady,
Assistant General Counsel &
Director of Legal Foundation



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128883**
Date Filed **7/15/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H		Consumer Class: R	
Name	Tom & Janet Huelskamp	Home Phone	6203385919		
Business		Mobile Phone			
Street Address1		Work Phone			
Street Address 2	36605 20 Road	Fax			
City, State, Zip	Fowler, 67844	Email	janet@unitedwireless.com		
Docket Opinion					
Company ID	Docket Number	Consumer Opinion	Number of Petitions		
GBEE	24-GBEE-790-STG	O	Signatures		
Narrative					
7/15/2024	<p>This comment serves to substantiate our opposition to the proposed placement of Grain Belt Express' Transmission line in southern Gray County.</p> <p>As owners/operators of three parcels of effected real estate (S36-T29S-R28; S25-T29-R28; and S13-T29-R28 all located in Gray County) that is on the Grain Belt Express published, we want it on record that we do not support the line crossing our property. We did not sign a contract for wind turbines, because of the detrimental effects to our property. We are also in opposition to the published proposal since the proposed line will run directly in front of several neighbors' homes and across viable homesteads (Merkle's and Boyd's).</p> <p>However, we do support the published Exhibit BBB-1 plat map, submitted by Mr. Brad Boyd on July 3, 2024. This proposal offers an alternative route for the line. The proposal diverts the line North on Road 16 in Gray County, rather than Highway 23, thus avoiding the above-mentioned homesteads. This alternative route appears to be much less intrusive to farmsteads, while also reducing the number of effected center-pivot irrigation systems. I also looks to add no more turns to the line's pathway.</p> <p>We appreciate your consideration of our opinion.</p> <p>Respectfully submitted Thomas & Janet Huelskamp 620-338-5919</p>				



Division of Public Affairs
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3100

Complaint ID **128886**
Date Filed **7/15/2024**
Investigator **SYSTEM**

Account Information		Notified KCC by: H	Consumer Class: R
Name	Richard Davis	Home Phone	4152382065
Business		Mobile Phone	
Street Address1		Work Phone	
Street Address 2	1360 Post Oak Boulevard, Suite 400	Fax	
City, State, Zip	Houston, 77056	Email	ricky.davis@engie.com
Docket Opinion			
Company ID	Docket Number	Consumer Opinion	Number of Petitions
GBEE	24-GBEE-790-STG	N	Signatures
Narrative			
7/15/2024	Please refer to comment letter sent to Brandon Donohue on 7/15/2024 from Engie Renewables NA LLC and dated the same.		



128886

1360 Post Oak Blvd., Ste. 400
Houston, Texas 77056
Phone: 415.238.2065

July 15, 2024

Office of Public Affairs and Consumer Protection
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604-4027

Re: Docket No. 24-GBEE-790-STG

Dear Sir or Madam:

ENGIE Renewables NA LLC ("**ENGIE**") is a developer, owner, and operator of renewable energy projects in the United States. ENGIE is an indirect parent company of Iron Star Wind Project, LLC, the owner of the Iron Star wind project located in Ford County, Kansas ("**Iron Star**"), which has been in commercial operations since 2021.

ENGIE is also the indirect parent of Horse Thief Wind Project, LLC ("**Horse Thief**"), Santa Fe Wind Project, LLC ("**Santa Fe**") and Midway Wind Project, LLC ("**Midway**"). Horse Thief is the owner of the interconnection, land and development rights associated with the proposed Horse Thief wind project, currently in development in Finney and Gray Counties, Kansas. Santa Fe is the owner of the interconnection, land and development rights associated with the proposed Santa Fe wind and solar projects currently in development in Ford, Hodgeman and Gray Counties, Kansas. And, finally, Midway is the owner of the interconnection, land and development rights associated with the proposed Midway wind project currently in development in Hodgeman, Ford and Edwards Counties, Kansas (Iron Star, Santa Fe, Horse Thief and Midway sometimes collectively referred to as the "**Projects**").

Iron Star received a letter from Grain Belt Express, LLC ("**Grain Belt**") dated June 14, 2024, regarding the Siting Application currently pending before the State Corporation Commission of the State of Kansas ("**KCC**"), in Docket No. 24-GBEE-790-STG. Iron Star's 297.6 megawatt (MW) operating wind farm is located south of Dodge City and immediately west of the proposed Grain Belt Express High Voltage Direct Current (HVDC) Converter Station (**Figure 1**). The Iron Star wind project consists of 62 wind turbines, each with a capacity of 4.8 MW. These turbines are connected via underground collection lines to a common collection substation, and then interconnected to ITC Great Plain's Saddle Substation via a 5-mile 345 kilovolt (kV) transmission line.

Grain Belt's proposed infrastructure for two inter-related transmission lines and associated facilities as part of the previously approved AC Collector System, as depicted in publicly available maps, intersects with Iron Star's infrastructure in several locations. Specifically, Grain Belt's proposed AC line intersects Iron Star's 345kV transmission line at one (1) location, and Iron Star's underground collection lines in five (5) locations (**Figure 2**). Additionally, Iron Star owns lands located in Ford County, KS, identified as parcel 02916931000000201001, which includes its operations building.



The Santa Fe, Midway and Horse Thief development projects will require access to certain transmission and land rights connected to the Iron Star project site and in the area designated for use by Grain Belt for its proposed infrastructure

The Projects are all interested parties regarding Grain Belt's proposed infrastructure for several reasons. The proposed infrastructure intersects with Iron Star's existing infrastructure, and the potential impacts on Iron Star's operations must be addressed as part of the proceeding before the KCC. These impacts could include downtime at the Iron Star wind project, the coordination of safety protocols during the installation of Grain Belt's facilities near existing buried collection lines, and the coordination of construction traffic during the installation of Grain Belt's infrastructure. Further, the potential impacts of the siting of Grain Belt's proposed transmission lines on the Santa Fe, Horse Thief and Midway projects may also be similarly significant and should be addressed as part of this proceeding.

The Projects only recently learned of the Grain Belt siting application and the specifics of the proposed location of the transmission lines and related infrastructure through the public notice and has not had sufficient time to analyze the full impacts of the proposed location of the Grain Belt lines. The Projects are therefore requesting intervenor status pursuant to a separate filing. Upon further discussion and discovery conducted as part of the site application proceeding, alternate siting of the AC Collector Lines from the siting originally presented may yield a more just and reasonable siting for the AC Collector Lines that better accommodates all of Grain Belt's interests, landowner interests, and the interests of the existing and future renewable energy projects in Southwest Kansas – including the interests of ENGIE, Iron Star, Horse Thief, Santa Fe, and Midway.

Each of the Projects have vested interests in access to real estate and transmission rights in and around the Iron Star wind project. Grain Belt's proposed siting will have significant implications on all of the Projects and may impact the future viability of each. ENGIE respectfully requests the right to participate as an intervenor in the proceeding in order to ensure that the Grain Belt lines and the proposed siting of them are reasonable, in light of the possible impacts on the Projects. Further, ENGIE has a vested interest in ensuring that the Grain Belt siting plan will make available, under appropriate regulatory processes, access to its proposed transmission lines. ENGIE's Horse Thief, Santa Fe, and Midway projects are each advanced development projects that could readily take advantage of the benefits that the Grain Belt project is bringing to the customers and off-takers in the State of Kansas who are interested in procuring readily accessible renewable energy.

We greatly appreciate the opportunity to offer this public comment in this docket and look forward to working productively with all parties to ensure the success of the proposed transmission infrastructure with minimal impacts to projects such as those described here.

Sincerely,

DocuSigned by:
Richard Davis
42731BDC44854D3...

Richard Davis
Vice President
Engie Renewables NA LLC

Attachments: **Figures 1 and 2**



Grain Belt Express LLC
Proposed AC Collector System
Route Through Iron Star Wind Project
7/11/2024

Legend

Grain Belt AC Collector Proposed (345 kV)

— Bucklin-Dodge City Route

— Meade-Dodge City Route

Other Proposed Grain Belt Express LLC
Infrastructure

— Grain Belt Express HVDC
Transmission Line Route

■ Proposed HVDC Terminal

Parcel Status

■ Under Contract with Iron Star Wind
Project LLC

□ Parcel Boundary

128886

Project Location



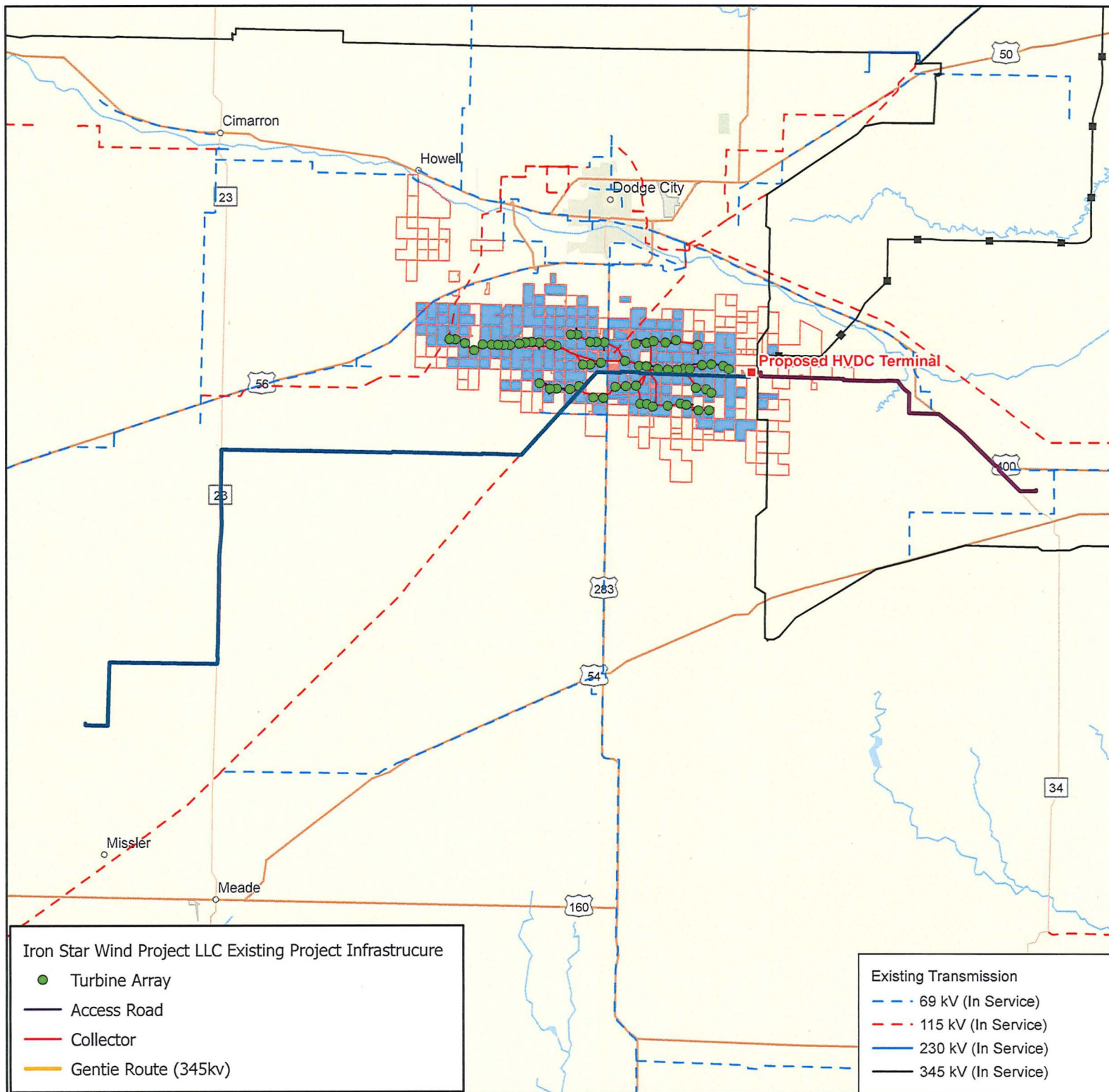
Reference

NAD 1983 StatePlane Kansas South FIPS 1502 Feet

0 3.5 7 Miles



CONFIDENTIAL





Grain Belt Express LLC
Proposed AC Collector System
Route Through Iron Star Wind Project
7/11/2024

Legend

Grain Belt AC Collector Proposed (345 kV)

— Bucklin-Dodge City Route

— Meade-Dodge City Route

Other Proposed Grain Belt Express LLC
Infrastructure

— Grain Belt Express HVDC
Transmission Line Route

■ Proposed HVDC Terminal

Parcel Status

■ Under Contract with Iron Star Wind
Project LLC

□ Parcel Boundary

#128886

Project Location



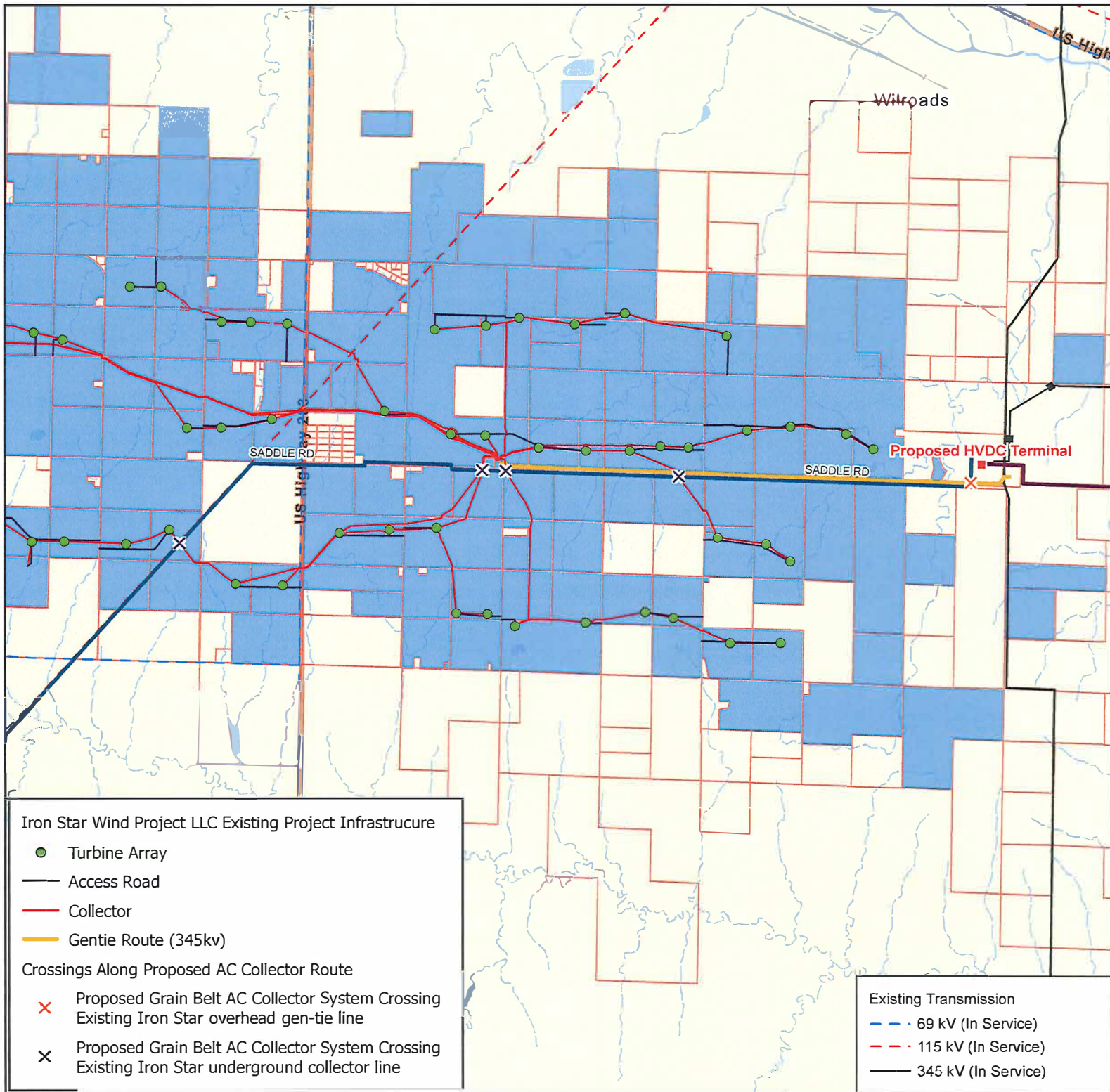
Reference

NAD 1983 StatePlane Kansas South FIPS 1502 Feet

0 0.75 1.5 Miles



CONFIDENTIAL



CERTIFICATE OF SERVICE

24-GBEE-790-STG

I, the undersigned, certify that a true and correct copy of the above and foregoing was served by electronic mail this 23rd day of July, 2024, to the following:

KEITH A. BROCK, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
kbrock@andersonbyrd.com

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
jflaherty@andersonbyrd.com

KEVIN CHANDLER, DIRECTOR, TRANSMISSION
BUSINESS DEVELOPMENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE, STE 1800
CHICAGO, IL 60606
kchandler@invenergy.com

NICOLE LUCKEY, SENIOR VICE PRESIDENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE, STE 1800
CHICAGO, IL 60606
nluckey@invenergy.com

BRAD PNAZEK, VP TRANSMISSION BUSINESS
DEVELOPMENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE, STE 1800
CHICAGO, IL 60606
bpnazek@invenergy.com

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brian.fedotin@ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
carly.masenthin@ks.gov

KYLER C. WINEINGER, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
kyler.wineinger@ks.gov

JAMES BRUNGARDT, MANAGER, REGULATORY
RELATIONS
MID-KANSAS ELECTRIC COMPANY, LLC
301 W 13TH ST
PO BOX 980
HAYS, KS 67601
jbrungardt@sunflower.net

LEAH M. DAVIS
MORGAN WILLIAMSON LLP
500 S. TAYLOR, SUITE 900
AMARILLO, TX 79101
ldavis@mw-law.com

CERTIFICATE OF SERVICE

24-GBEE-790-STG

ANNE E. CALLENBACH, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

JARED R. JEVONS, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
jjevons@polsinelli.com

ANDREW O. SCHULTE, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
aschulte@polsinelli.com

CLARENCE SUPPES, SENIOR MANAGER TRANSMISSION
ENG.
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020
HAYS, KS 67601-1020
cdsuppes@sunflower.net

AL TAMIMI, SVP & COO - TRANSMISSION
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020
HAYS, KS 67601-1020
atamimi@sunflower.net

AMANDA WRAY, CORPORATE PARALEGAL
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020
HAYS, KS 67601-1020
awray@sunflower.net

TAYLOR P. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
tcalcara@wcrf.com

JEFFREY M KUHLMAN, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
jkuhlman@wcrf.com

/s/ Sally Conn

Sally Conn, Executive Secretary