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**LATHAM & WATKINS** LLP

January 29, 2024

Debbie-Anne A. Reese  
Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: **Renewed Request for Expedited  
Consideration**  
*Grain Belt Express LLC*, Docket No. ER24-59-000

Dear Secretary Reese:

Grain Belt Express LLC (“Grain Belt Express”) respectfully submits this renewed request for expedited consideration of its application to amend its existing negotiated rate authority (“Application”) filed in this docket on October 6, 2023. Grain Belt Express originally requested an order on the Application by December 5, 2023 in order to maintain its schedule. Grain Belt Express is now providing this letter to update the Commission on its progress and to reiterate the need for an order on its Application in February so that Grain Belt Express can initiate its open solicitation process and execute transmission service agreements by the end of the second quarter, which, in turn, will be critical to obtaining financing by the end of 2024, which, in turn, is needed to start construction in 2025.

Grain Belt Express is developing an approximately 800-mile, overhead, multi-terminal 600 kilovolt high-voltage, direct current transmission line and associated facilities, including converter stations and alternating current connector lines (the “Project”). The Project will provide the capacity to deliver up to 5,000 MW, primarily from renewable energy generation facilities in Western Kansas, to load-serving entities in the Midwest and adjacent regions via an interconnection with Midcontinent Independent System Operator, Inc., PJM Interconnection, L.L.C., and Associated Electric Cooperative, Inc.

Grain Belt Express requested expedited consideration in its Application because it is pursuing a 2025 start of construction date for the first phase of the Project.<sup>1</sup> In order to stay on that schedule, Grain Belt Express is on schedule to obtain financing for the Project by the end of 2024. However, securing transmission service agreements is expected to be important to lenders. And, in order to obtain transmission service agreements, Grain Belt Express would first need an order on its Application, so that it can run an open solicitation and then award and negotiate those transmission service agreements. If an order is not issued in February, Grain Belt Express

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<sup>1</sup> Application at 13.

is concerned that its plan for a 2024 financing may be delayed, which would, in turn, delay the start of construction.

Such a delay would, in turn, further delay the realization of the benefits created by the Project, including the opportunity for the development of renewable generation in a resource-rich area, as well as the reliability and resilience benefits stemming from the interregional nature of the Project. Based upon initial feedback, Grain Belt Express currently anticipates significant interest in the open solicitation.

Accordingly, Grain Belt Express respectfully requests that the Commission issue an order on the Application in February so that development of the Project (open solicitation, TSAs, financing and then construction) can proceed on schedule.

Respectfully submitted,

/s/ David L. Schwartz

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*Counsel for Grain Belt Express LLC*

cc: Jignasa Gadani; Valerie Teeter; Maria Farinella; Natalie Tingle-Stewart; Michael McLaughlin

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated at Washington, D.C., this 29th day of January, 2024.

*/s/ Richard H. Griffin* \_\_\_\_\_

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