

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

**In the Matter of the Application of Grain)
Belt Express Clean Line LLC for Certificate)
of Convenience and Necessity Authorizing it)
to Construct, Own, Operate, Control,)
Manage and Maintain a High Voltage,)
Direct Current Transmission Line and an)
Associated Converter Station Providing an)
Interconnection on the Maywood-)
Montgomery 345 kV transmission line.)**

Case No. EA-2016-0358

**OBJECTIONS OF GRAIN BELT EXPRESS
TO LOCAL PUBLIC HEARING EXHIBIT NO. 47**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”) submits the following objection to Local Public Hearing Exhibit Number 47 offer into evidence at the Cameron local public hearing.

Objection

LPH Exhibit 47: Grain Belt Express objects to the admission of LPH 47 offered into evidence at the local public hearing in Cameron, Missouri on December 13, 2016 by Katie McKay. LPH Exhibit 47 is a data request response from Grain Belt Express to Missouri Landowners Alliance ("MLA") marked as "EA-2016-0358.GBX response to MLA-G52.Attachment 01". The responsive document itself is a Clinton County Missouri, County Apportionment Schedule 13, State Tax Commission of Missouri. The witness that offered the data response into evidence, Katie McKay, is an incorporator of Block Grain Belt Express Missouri, as shown in the attached Articles of Incorporation for Block Grain Belt Express Missouri, filed with the Missouri Secretary of State on February 10, 2014. See Exhibit 1.

It is entirely inappropriate for MLA to provide a representative of Block Grain Belt Express Missouri with a data request response from Grain Belt Express and attempt to have that

response entered into the evidentiary record via a witness at the local public hearing. While Grain Belt Express takes no issue with the document itself, MLA's attempt to circumvent the evidentiary hearing by having a proxy organization, Block Grain Belt Express Missouri, represented by the same legal counsel as MLA and coordinating with MLA¹, offer data request responses into the evidentiary record is a flagrant disregard for the purpose of the local public hearings and the ground rules established by the Commission for the local public hearings.

Respectfully submitted,

/s/ Karl Zobrist

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Attorneys for Grain Belt Express Clean Line LLC

¹ As discussed in Paragraph 4 of "Amended Reply of Grain Belt Express to the Responses of Missouri Landowners and Show-Me Concerned Landowners to Objections to Exhibits Offered at Local Public Hearings" filed January 3, 2017, MLA admitted in response to the 3rd Set of Data Requests from Grain Belt Express that MLA and Block Grain Belt Express Missouri are represented by the same legal counsel and have coordinated their efforts to oppose the Application of Grain Belt Express.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record in this case on this 23rd day of January 2017.

/s/ Karl Zobrist
Attorney for Grain Belt Express Clean Line LLC

EXHIBIT 1

File Number:
N01376671
Date Filed: 02/10/2014
Jason Kander
Secretary of State



State of Missouri
Jason Kander, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

Articles of Incorporation of a Nonprofit Corporation

(Submit with a filing fee of \$25.00)

The undersigned natural person(s) of the age of eighteen years or more for the purpose of forming a corporation under the Missouri Nonprofit Corporation Act adopt the following Articles of Incorporation:

1. The name of the corporation is Block Grain Belt Express Missouri, Corp

2. This corporation is a Public Public or Mutual Benefit Corporation.

3. The period of duration of the corporation is Perpetual
"Perpetual" unless stated otherwise

4. The name and street address of the Registered Agent and Registered Office in Missouri is:
Russell J. Pisciotta 4755 NW State Rd. W Kidder, MO 64649
Name Address City/State/Zip

5. The name(s) and address(es) of each incorporator:
Russell J. Pisciotta 4755 NW State Rd. W Kidder, MO 64649
Katie McKay 10369 NE 336th St Cameron, MO 64429

6. Will the corporation have members? YES NO

7. The assets of the corporation will be distributed on dissolution as follows: Upon dissolution, the remaining assets will be donated to another organization fighting for this same cause, whether it is in Missouri, or another impacted state.

8. The corporation is formed for the following purpose(s): Our purpose is to educate our citizens and defeat the Grain Belt Express Clean Line transmission line proposal

9. The effective date of this document is the date it is filed by the Secretary of State of Missouri unless a future date is otherwise indicated: January 31, 2014
(Date may not be more than 90 days after the filing date in this Office)

(Please see next page)

Name and address to return filed document:
Name: Katie McKay
Address: 10369 NE 336th St
City, State, and Zip Code: Cameron, MO 64429

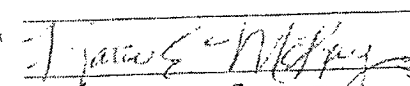
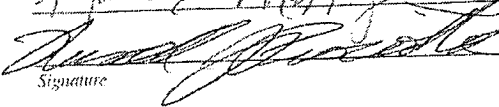
Corp. 52 (01/2012)
State of Missouri
Creation - NonProfit 2 Page(s)



T1404202098

In Affirmation thereof, the facts stated above are true and correct:
(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

Must be signed by all Incorporator(s):

	Katie E. McKay	1/31/2014
	Russell J Pisciotta	1/31/2014
<i>Signature</i>	<i>Printed Name</i>	<i>Date Signed</i>

State of Missouri



Jason Kander
Secretary of State

CERTIFICATE OF INCORPORATION MISSOURI NONPROFIT

WHEREAS, Articles of Incorporation of

Block Grain Belt Express Missouri, Corp
N01376671

have been received and filed in the Office of the Secretary of State, which Articles, in all respects, comply with the requirements of Missouri Nonprofit Corporation Law;

NOW, THEREFORE, I, JASON KANDER, Secretary of the State of Missouri do by virtue of the authority vested in me by law, do hereby certify and declare this entity a body corporate, duly organized this date and that it is entitled to all rights and privileges granted corporations organized under the Missouri Nonprofit Corporation Law.

IN TESTIMONY WHEREOF, I hereunto
set my hand and cause to be affixed the
GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, this
10th day of February, 2014.

A handwritten signature in cursive script that reads "Jason Kander".

Secretary of State

