

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt Express)
Clean Line LLC for a Certificate of Convenience and)
Necessity Authorizing it to Construct, Own, Operate,)
Control, Manage, and Maintain a High Voltage, Direct) Case No. EA-2014-0207
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

MISSOURI FARM BUREAU RESPONSE IN OPPOSITION TO
RECOMMENDATION OF GRAIN BELT EXPRESS CLEAN LINE LLC

The Missouri Farm Bureau respectfully submits the following response in opposition to the “Recommendation of Grain Belt Express Clean Line LLC” filed on June 10, 2015.

1. Grain Belt Express has asked this Commission to hold the case open indefinitely so that it can continue to provide additional information to the Commission. This “recommendation” should be rejected for several reasons.

2. During the case discussion at the June 2 open agenda meeting, all of the Commissioners indicated that they could rely on the evidence already in the record and did not need any additional information. None of the Commissioners stated or even intimated that the record was lacking in any way or that they needed any additional information to decide the case. Three of the Commissioners, a majority, said they had decided to deny the application.

3. Despite the discussion at the June 2 open agenda meeting, Grain Belt Express wants yet another opportunity to provide what it has failed to provide to date—adequate evidence that it should be granted a Certificate of Convenience and Necessity.

In the Missouri Farm Bureau's opinion, Grain Belt Express has been given every opportunity—even the opportunity to provide supplemental information after the record in the case was closed—to convince the Commission to approve its application. Grain Belt Express has failed.

4. The Missouri Farm Bureau also believes that leaving the case open under these circumstances (three Commissioners indicating that they have decided to deny the application) would prejudice the landowners. The landowners are not funded by large private investors as is Grain Belt Express, and it would be difficult for the landowners in this case to continue to bear legal and other costs in the long, drawn out procedure that Grain Belt Express is proposing in its June 10 filing. It is also a waste of state resources to continue this case after the majority of the Commission voted to deny the application. In addition, leaving the case open indefinitely with the hammer of eminent domain hanging over the land could adversely affect land values and harm the landowners.

5. The Missouri Farm Bureau's position has always been that protection of property rights is among the most fundamental beliefs expressed in its policy positions. Missouri Farm Bureau has a longstanding policy pertaining to various aspects of property rights, including the use of eminent domain. Missourians hold deeply that eminent domain power should be tightly controlled and used only when absolutely necessary for public purposes and not for economic development purposes. A private developer, like Grain Belt Express, which wants to operate for purely private purposes outside of the regional transmission organization planning process, is not entitled to the rights of a public utility, and should not be given eminent domain authority.

6. In closing, the Missouri Farm Bureau believes that leaving the case open is unnecessary and counterproductive given the case discussion at the June 2 open agenda meeting, and any further proceedings in the case would harm landowners. The Missouri Farm Bureau respectfully requests that the Commission issue an order denying the Grain Belt Express application as soon as possible.

Respectfully submitted,
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June 15, 2015

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 15th day of June, 2015.



Terry M. Jarrett