

**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)

**MATTHEW AND CHRISTINA REICHERT'S RESPONSE
IN OPPOSITION TO
GRAIN BELT EXPRESS CLEAN LINE'S RECOMMENDATION
FOR LOCAL PUBLIC HEARINGS**

Matthew and Christina Reichert (Reicherts) file this Response in Opposition to Grain Belt Express Clean Line LLC's (GBE's) Recommendation for Local Public Hearings. The Reicherts state the following:

1. They ask that the Missouri Public Service Commission (PSC) reject GBE's recommendations for the reasons stated in the Show Me Concerned Landowners Response to GBE's recommendations and in the Response of the Missouri Landowners Alliance to GBE's recommendations.

2. The case *In re Union Electric Co. Application for Authority to Construct Callaway-Franks Line*, No. EO-2002-351, cited by GBE as support for only three public hearing locations is inapplicable to this case.

3. Union Electric applied for the construction of the Callaway-Franks Line consisting of a 54 mile long, 345 kilovolt (kV) transmission line erected on two-pole "H" structures av-

eraging 80 feet tall. *In re Union Electric Co. Application for Authority to Construct Callaway-Franks Line*, No. EO-2002-351, Report and Order, p. 7-8 (Aug. 21, 2003).

4. Union Electric proposed to route the Callaway-Franks Line over 43 miles of existing right-of-way acquired by the Associated Electric Cooperative, Inc. (AECI). *Id.* These 43 miles comprised approximately 80 percent of the total right-of-way.

5. GBE is proposing a +600 kV transmission line erected on a combination of lattice, lattice mast, and tubular steel structures expected to be 110 to 150 feet tall. Application of Grain Belt Express Clean Line LLC at p. 12.

6. GBE is proposing a route of approximately 206 miles. The route will consist of Alternative Route B for Segment 1 and Alternative Route D for Segment 2. Direct Testimony of Timothy B. Gaul on Behalf of Grain Belt Express Clean Line LLC at pgs. 9-10.

7. Table 5-9 in the Missouri Route Selection Study cited by Mr. Gaul lists the use of 5.1 miles of existing right-of-ways for Alternative Route B. Missouri Route Selection Study at p. 5-28. Table 5-10 lists the use of 54.9 miles of existing right-of-ways for Alternative Route D. *Id.* at p. 5-29. See also Direct Testimony of Timothy B. Gaul at p. 10. Therefore, only 60.0 miles or 29% of the 206 mile transmission line will use existing right-of-ways.

8. *In re Union Electric Co. Application for Authority to Construct Callaway-Franks Line* is totally inapplicable to this case based on GBE's significantly lower use of existing right-of-ways and GBE's use of significantly larger transmission infrastructure that is more obtrusive and disruptive.

9. Randall and Roseanne Meyer join in the Reichert's response in opposition to GBE's recommendations for local public hearings.

Therefore, the Reicherts respectfully ask the PSC to issue an Order setting eight public hearings as described in the Staff's recommendations.

Respectfully submitted,

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/s/ Gary Drag

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CERTIFICATE OF SERVICE

I certify that true and accurate copies of this Motion were sent by e-mail on June 10, 2014, to all parties on the official service list for this case.

/s/ Gary Drag

Gary Drag, MBN 59597

Attorney for Matthew and Christina Reichert

Attorney for Randall and Roseanne Meyer