

**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 EXHIBITS OFFERED AT LOCAL PUBLIC HEARINGS**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”), submits the following objections and other responses to exhibits offered by members of the public at Local Public Hearings for this case.

Objections

LPH Exhibits 4 -9: Grain Belt Express objects to the admission of LPH Exhibits 4 - 9 offered by Ms. Marilyn O'Bannon. According to the testimony of Ms. O'Bannon at the local public hearing in Monroe City, Missouri on December 7, 2016, LPH Exhibit 4-9 are "pictures of an electrical line update made on a Century Farm three years ago. These photographs are not of the Grain Belt Express Project, but of another unspecified transmission line construction project at an unspecified location. Without any context these photographs are irrelevant to the case at bar and unduly prejudicial to the Company.

LPH Exhibits 14-18: Grain Belt Express objects to the admission of LPH Exhibits 14-18 offered by Ms. Edmunds at the local public hearing in Hannibal, Missouri on December 7, 2016. LPH Exhibits 14 - 17 are pictures of landscape. No evidence was offered to show what impact, if any, the Grain Belt Express Project would have on the specific images shown in the picture.

Because the requisite foundational evidence is lacking, the unduly prejudicial effect of these pictures greatly outweighs any probative value they may have. LPH Exhibit 18 is a family photograph which, respectfully, is irrelevant to this proceeding.

LPH Exhibit 22: Grain Belt Express objects to the admission of Exhibit 22 entitled "Location of Property" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibits 25: Grain Belt Express objects to the admission of Exhibit 24 entitled "Negative Health Effects of EMFs Proven" by an organization called "Responsible Electricity Transmission for Albertans" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 26: Grain Belt Express objects to the admission of Exhibit 25, article entitled "Is living near power lines bad for our health" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 27: Grain Belt Express objects to the admission of Exhibit 27, an article entitled "Landowners Concerned about New Transmission Line from Wabamun to Fort McMurray" by an organization called "Responsible Electricity Transmission for Albertans" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document. Grain Belt Express further objects on the basis that this exhibit is irrelevant to this Missouri proceeding.

LPH Exhibit 28: Grain Belt Express objects to the admission of Exhibit 28, an article entitled "Is living near power lines bad for our health" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 29: Grain Belt Express objects to the admission of Exhibit 29, a document entitled "Effects of High Voltage transmission Lines on Humans and Plants" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 30: Grain Belt Express objects to the admission of Exhibit 30, an article for Midwest Today magazine entitled "Do High-Voltage Power Lines Cause Cancer" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 31: Grain Belt Express objects to the admission of Exhibit 31, a document entitled "Power Lines - Myths vs. Facts" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted. Also, Grain Belt Express objects to this exhibit as the proper foundation was not laid for the admission of this document.

LPH Exhibit 32: Grain Belt Express objects to the admission of Exhibit 32, an article from The Moberly Monitor-Index entitled "Grain Belt touts local benefits before public hearings" as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted.

LPH Exhibit 33: Grain Belt Express objects to the admission of Exhibit 33, articles entitled "The Price Effects of HVTLs on Abutting Homes," "New AltaLink Power Line Will Kill Birds Near Innisfail," and "Criteria for Pipelines Co-Existing with Electric Power Lines" as these articles are hearsay in that they are out-of-court statements offered for the truth of the matter asserted. Further the article "New AltaLink Power Line Will Kill Birds Near Innisfail" is not relevant to this proceeding.

LPH Exhibit 35: Grain Belt Express objects to the admission of Exhibit 35, an article entitled "Lesson For EPA: Higher Energy Prices Harm People," as it is hearsay in that it is an out-of-court statement offered for the truth of the matter asserted.

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record in this case on this 27th day of December 2016.

/s/ Karl Zobrist

Attorney for Grain Belt Express Clean Line LLC