

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, and)
Eastern Missouri Landowners Alliance)
DBA Show Me Concerned Landowners, and)
John G. Hobbs,)
)
Complainants,)
)
V.)
)
Grain Belt Express LLC, and)
Invenergy Transmission LLC)
)
Respondents)

Case No. EC-2021-0059

FIRST SET OF DATA REQUESTS FROM COMPLAINANTS TO RESPONDENTS

Definition:

“Correspondence” includes all forms of written communication, including but not limited to letters, emails and text messages.

Data Requests:

1. Please provide a copy of all correspondence between either or both of the Respondents on the one hand, and Kansas Governor Laura Kelly and/or any member of her staff on the other, which address (1) any of the changes to the proposed Grain Belt transmission project as referred to in the press release included as Exhibit 1 to the Complaint in this case; or (2) the content of the press release itself.
2. Please provide a copy of all correspondence between either or both of the Respondents on the one hand, and Kansas Secretary of Commerce David Toland and/or any member of his staff on the other, which address (1) any of the changes to the proposed Grain Belt transmission project as referred to in the press release included as Exhibit 1 to the Complaint in this case; or (2) the content of the press release itself.
3. Please provide a copy of all correspondence between either or both of the Respondents on the one hand, and Mr. James Owen of Renew Missouri on the other, dealing with (1) the changes announced in the press release included as Exhibit 1 to the Complaint in this case; or (2) the content of the press release itself.

4. Please provide a copy of all correspondence between either or both of the Respondents on the one hand, and Mr. John Coffman of the Consumers Council of Missouri on the other, dealing with (1) the changes announced in the press release included as Exhibit 1 to the Complaint in this case; or (2) the content of the press release itself.
5. Please provide a copy of all correspondence between Mr. Kris Zadlo of Invenergy Transmission on the one hand, and officers, employees or agents of Invenergy Transmission or its affiliated companies on the other, dealing with (1) the changes announced in the press release included as Exhibit 1 to the Complaint in this case; or (2) the content of the press release itself.
6. Please provide a copy of all correspondence compiled on or after March 20, 2020 (one year after the CCN was issued by the Missouri Commission to Grain Belt) between Mr. Kris Zadlo of Invenergy Transmission on the one hand, and officers, employees or agents of Invenergy Transmission or its affiliated companies on the other, dealing with possible changes in the transmission project approved in Case No. EA-2016-0358, other than changes already addressed in response to the preceding item.
7. On what date did Invenergy decide to approve the “phased construction plan” announced in the press release attached as Exhibit 1 to the Complaint in this case?
8. Do Respondents presently plan to eventually seek regulatory approval from the Missouri Commission for the changes described in the press release attached as Exhibit 1 to the Complaint in this case, assuming no other significant changes are proposed to the project as originally approved?
9. If the answer to the preceding item is “yes”, on what date or approximate date do Respondents anticipate they will file for such approval.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing data requests was served upon all parties of record by electronic mail this 16th day of December, 2020.

/s/ Paul A. Agathen
Attorney for Complainants