

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

Missouri Landowners Alliance, and)	
Gary Mareschal,)	
)	
Complainants,)	
)	Case No. EC-2020-0408
)	
v.)	
)	
)	
)	
Grain Belt Express LLC, and)	
Invenergy Transmission LLC, and)	
Invenergy Investment Company,)	
)	
Respondents)	

JOINT MOTION FOR ADOPTION OF PROCEDURAL SCHEDULE

The Staff of the Missouri Public Service Commission (“Staff”), Missouri Landowners Alliance and Gary Mareschal (together, “Complainants”), and Invenergy Investment Company LLC (“Invenergy Investment”), Invenergy Transmission LLC (“Invenergy Transmission”), and Grain Belt Express LLC (“Grain Belt”) (along with Invenergy Investment and Invenergy Transmission, the “Respondents”) (Staff, Complainants, and Respondents collectively, the “Joint Movants”), hereby file this Joint Motion for adoption of a procedural schedule by the Missouri Public Service Commission (“Commission”). In support of its Joint Motion, Joint Movants state the following:

1. On June 22, 2020, the Complainants filed a Formal Complaint against Respondents.
2. On June 23, the Commission issued a Notice of Formal Complaint and Order Directing Staff to File a Preliminary Report, directing Respondents to file a response to the Formal Complaint no later than July 23, 2020 and Staff to file a preliminary report no later than August 6, 2020.

3. On June 25, 2020, Respondents filed a Motion to Dismiss the Formal Complaint, to which Complainants filed their Opposition on July 9, 2020. The Commission has not ruled on the Motion to Dismiss.

4. On July 23, 2020, Respondents filed their Response to Formal Complaint.

5. On August 6, 2020, Staff filed its Preliminary Report, stating that it will file a full report no later than August 31, 2020.

6. On August 7, 2020, Complainants filed a Motion to Amend Complaint to correct the name of Respondent Grain Belt Express LLC. That Motion was granted by the Commission on August 10, 2020.

7. On August 31, 2020, Staff filed its full Report. At page 10 of its Report, Staff recommended that “the Commission direct Invenergy to periodically continue training to current Land Agents and ensure new Land Agents receive all available training.”

8. On September 10, 2020, Respondents filed their Response to Staff Report and a Motion for Summary Determination.

9. On September 14, 2020, the Joint Movants participated in a Procedural Conference, as directed by the Commission.

10. As a result of discussions at the Procedural Conference and follow-up correspondence, Joint Movants request that the Commission establish the following procedural dates for resolution of this matter.

Event	Date
Responses to Motion for Summary Determination	October 13, 2020
Order on Motion for Summary Determination	November 4, 2020
<i>Dates below are required only if Motion for Summary Determination is not granted. If an Order on Respondents’ Motion is not issued by November 4, 2020, the Parties will request that the Procedural Schedule as outlined below be suspended until an Order is issued.</i>	
Discovery Conference	November 6, 2020

Stipulation of Undisputed Facts	December 7, 2020
Joint list of issues, list of direct examination exhibits, order of witnesses, order of parties for cross-examination, order of opening statements	December 7, 2019
Position statements	December 8, 2020
Evidentiary Hearing	December 14, 2020
Simultaneous Post-Hearing Briefs	December 21, 2020

WHEREFORE, Joint Movants respectfully request that the Commission adopt the procedural schedule proposed herein.

/s/ Andrew O. Schulte

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 23rd day of September, 2020.

/s/ Andrew O. Schulte
Attorney for Respondents