

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, and)
Gary Mareschal,)
)
Complainants,)
)
v.)
)
)
)
Grain Belt Express LLC, and)
Invenergy Transmission LLC, and)
Invenergy Investment Company,)
)
Respondents)

Case No. EC-2020-0408

JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE

The Staff of the Missouri Public Service Commission (“Staff”), Missouri Landowners Alliance and Gary Mareschal (together, “Complainants”), and Invenergy Transmission LLC (“Invenergy Transmission”), on behalf of itself and its parent company Invenergy Investment Company LLC (“Invenergy Investment”, collectively, “Invenergy”), together with Grain Belt Express LLC (“Grain Belt”) (together with Invenergy, the “Respondents”) (Staff, Complainants, and Respondents collectively, the (“Joint Movants”)), pursuant to 20 CSR 4240-2.080, hereby file this Joint Motion to Suspend Procedural Schedule. In support of this Joint Motion, Joint Movants state the following:

1. On June 22, 2020, Complainants filed a formal complaint against Respondents.¹

¹ Because the full procedural history of this proceeding has been noted in prior pleadings, in this Joint Motion Joint Movants will present an abbreviated summary of the procedural history of this matter.

2. On June 23, 2020, the Missouri Public Service Commission (“Commission”) issued a Notice of Formal Complaint and Order Directing Staff to file a response to the Formal Complaint no later than July 23, 2020.

3. On June 25, 2020, Respondents filed a Motion to Dismiss Formal Complaint, to which Complainants filed their Opposition on July 9, 2020.

4. On September 10, 2020, Respondents filed a Motion for Summary Disposition, to which were filed numerous responsive pleadings.

5. On September 14, 2020, the Joint Movants participated in a Procedural Conference, as directed by the Commission. Thereafter, on September 23, 2020, Joint Movants filed a Joint Motion for Adoption of Procedural Schedule. The Commission issued its Procedural Schedule Order on September 29, 2020.

6. Joint Movants’ Joint Motion for Adoption of Procedural Schedule included a request for a Commission order on the Motion for Summary Determination by November 4, 2020, and noted that the dates after November 4, 2020 “are required only if [the] Motion for Summary Determination is not granted.” Additionally, the Joint Motion for Adoption of Procedural Schedule stated, “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.”²

7. As of the date of this filing, the Motion for Summary Determination has not yet been ruled upon. On November 4, 2020, Joint Movants conferred by e-mail and agreed to file the instant pleading in accordance with the Joint Motion for Adoption of Procedural Schedule. Accordingly, Joint Movants request that the procedural schedule for this proceeding be suspended

² Joint Motion for Adoption of Procedural Schedule at p. 3.

until such time as a decision is rendered upon the pending Motion for Summary Determination. If the Motion for Summary Determination is not granted, the suspension can be lifted and new procedural dates established. If the Motion for Summary Determination is granted, the remaining dates on the procedural schedule will not be required.

WHEREFORE, Joint Movants respectfully request that the Commission accept this Joint Motion, suspend the procedural schedule, issue an order on the Motion for Summary Determination at its earliest convenience, and for such further relief as the Commission may deem just and appropriate.

Respectfully submitted,

/s/ Anne E. Callenbach

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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 5th day of November, 2020.

/s/ Anne E. Callenbach
Attorney for Respondents