

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.)	
)	Case No. EC-2021-0059
Grain Belt Express LLC, and)	
Invenergy Transmission LLC)	
)	
Respondents.)	

JOINT MOTION FOR PROCEDURAL SCHEDULE

The Staff of the Missouri Public Service Commission (“Staff” and “Commission”, respectively), Missouri Landowners Alliance, Eastern Missouri Landowners Alliance, d/b/a Show-Me Concerned Landowners, and John G. Hobbs (together, “Complainants”), and Invenergy Transmission LLC (“Invenergy Transmission”), together with Grain Belt Express LLC (“Grain Belt” and together with Invenergy Transmission, the “Respondents”) (Staff, Complainants and Respondents collectively, the “Joint Movants”), hereby file this *Joint Motion for Procedural Schedule* pursuant to the January 6, 2021 Order issued by the Commission. In support of this Joint Motion, Joint Movants state the following:

I. Abridged Background

1. On September 2, 2020, Complainants filed a Complaint with the Commission, alleging that Respondents’ contemplated changes to the Grain Belt Express Project (the “Project”), as discussed in a website posting and press release, invalidated the Certificate of Convenience and Necessity (“CCN”) granted to Respondent Grain Belt in Case No. EA-2016-0358 (the “CCN case”).

2. For the sake of brevity, and in light of the fact that the full procedural history of this proceeding has been set forth in recent pleadings and Orders of the Commission, Joint Movants will not restate the full procedural history here.

3. The Commission’s January 6, 2021 Order Regarding Motion for Clarification and Suspension of Requirement to File Procedural Schedule directed Joint Movants to submit a proposed procedural schedule no later than January 11, 2021.

4. Joint Movants have conferred via telephone and electronic correspondence and have agreed upon the following procedural schedule:

Event	Date
Deadline for Motion to Compel, if Necessary* <i>*Motion to Compel on existing discovery requests only</i>	February 2, 2021
Assumed date of resolution of any outstanding discovery disputes by the Commission* <i>*If there are unresolved discovery disputes after February 17, 2021, the Joint Movants agree that they will seek to suspend or extend the subsequent procedural dates</i>	February 17, 2021
Complainants’ Direct Evidence	February 26, 2021
Respondents Rebuttal Testimony & Staff Rebuttal Testimony/Report	March 12, 2021
Complainants’ Surrebuttal Testimony	March 19, 2021
Final Day to Submit Discovery	March 23, 2021
Joint list of issues, list of direct examination exhibits, order of witnesses, order of parties for cross-examination, order of opening statements	March 23, 2021
Position Statements	March 26, 2021
Evidentiary Hearing	April 1, 2021
Simultaneous Post-Hearing Briefs	April 16, 2021

WHEREFORE, Joint Movants respectfully request that the Commission adopt the procedural schedule proposed herein, and for any 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 11th day of January, 2021.

/s/ Anne E. Callenbach

Attorney for Respondents