

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt Express )  
Clean Line LLC for Approval of its Acquisition by ) No. EM-2019-0150  
Invenergy Transmission LLC )

APPLICATION TO INTERVENE  
OF THE EASTERN MISSOURI LANDOWNERS ALLIANCE  
DBA SHOW ME CONCERNED LANDOWNERS

Comes now the Eastern Missouri Landowners Alliance DBA Show Me Concerned Landowners (“Show Me”) and pursuant to Commission Rule 4 CSR 240-2.075 respectfully applies for intervention as a party in this case. In support of this Application, Show Me states as follows:

1. Show Me asks that communications regarding this case be directed to its attorney, whose contact information is provided below.
2. Show Me is a non-profit corporation in good standing organized under the laws of the state of Missouri and doing business under a duly registered fictitious name. Show Me was created on April 4, 2014, and has over 400 members, most of whom live on or in proximity to the route of the proposed Grain Belt transmission line, as described by Grain Belt in Case No. EA-2016-0358.
- 3 Show Me is an intervener in Grain Belt’s application for a CCN in Case No. EA-2016-0358, and intervened in the 2014 CCN case as well. It expects to oppose the joint Application filed in this case by Grain Belt and Invenergy.
4. The members of Show Me who live on the proposed transmission line right of way might be subject to eminent domain proceedings if the Grain Belt project is

approved. Those who live near the right-of-way would also be affected to varying degrees by the presence of the proposed line and supporting steel structures.

5. Show Me understands that if the Commission does not approve the sale of Grain Belt to Invenergy in this case, that Grain Belt would not have access to the resources of Invenergy to complete the Project. This in turn could affect the ability of Grain Belt to construct the proposed line. Therefore, as opponents of the Project, Show Me and its members have a definite interest in the outcome of this proceeding.

6. Intervention by Show Me is a sensible and practicable means for a large number of landowners to be given a voice in a proceeding in which they have a vital interest. Show Me's intervention in this case would therefore serve the public interest.

7. For the reasons stated above, Show Me and its members have interests which are different from that of the general public. Those interests could be adversely affected if the Application in this case from Grain Belt and Invenergy is approved.

Wherefore, Show Me respectfully asks the Commission to grant this Application to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen  
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail upon counsel for all parties this 13th day of February, 2019.

/s/ Paul A. Agathen  
Paul A. Agathen