

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of)
the Application of Grain Belt Express)
Clean Line LLC for a Certificate of)
Convenience and Necessity Authorizing)
it to Construct, Own, Operate, Control,) File No. EA-2016-0358
Manage and Maintain a High Voltage,)
Direct Current Transmission Line and an)
Associated Converter Station Providing)
an Interconnection on the Maywood-)
Montgomery 345kV Transmission Line)

APPLICATION TO INTERVENE
BY THE MISSOURI FARM BUREAU FEDERATION

COMES NOW the Missouri Farm Bureau Federation (“Missouri Farm Bureau” or “MFB”), by and through undersigned counsel, and pursuant to Commission Rule 4 CSR 240-2.075 respectfully applies for intervention as a party in this case initiated by Grain Belt Express Clean Line LLC, (“Grain Belt”) on August 30, 2016. In support of this application, Missouri Farm Bureau states as follows:

1. Missouri Farm Bureau is a nonprofit corporation in good standing organized under the laws of Missouri. Missouri Farm Bureau is the state’s largest agricultural organization, with a mission to improve the quality of life for Missouri’s farmers and ranchers and all rural Missourians. MFB has 141 offices in 113 counties, and each county Farm Bureau is run by its local members.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Brent E. Haden
HADEN & HADEN LLC
827 E. Broadway, Suite B
Columbia, MO 65201
(573) 442-3535

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3. On August 31, 2016, the Commission issued an Order directing interested parties to intervene by September 14, 2016, and thus this Application is timely.
4. Missouri Farm Bureau has long defended property owners and property rights in cases involving eminent domain takings of farms or ranches. MFB believes that the benefits claimed by Grain Belt do not justify the granting of eminent domain powers to Grain Belt. The interest claimed by Grain Belt is different than and is opposed to the general public interest.
5. Missouri Farm Bureau opposes the Application filed by Grain Belt and reserves the right to provide the Commission with more detailed positions on Grain Belt's proposals and testimony submitted in this case.
6. Missouri Farm Bureau believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, assisting the Commission in its decision-making in this case, and wishes to become a party to this case for all purposes.

WHEREFORE, Missouri Farm Bureau respectfully request that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

HADEN & HADEN LLC



Brent E. Haden, Mo. Bar No. 54148

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Dated: September 13, 2016

CERTIFICATE OF SERVICE

I hereby certify the copies of the foregoing have been mailed, e-mailed or hand delivered to all parties on the official service list for this case on this 13th day of September, 2016.

A handwritten signature in blue ink, appearing to read "Brent E. Haden". The signature is fluid and cursive, with the first name "Brent" and last name "Haden" being the most legible parts.

Brent E. Haden, Mo. Bar No. 54148