

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

**In the Matter of the Application of Grain)
Belt Express Clean Line LLC for Certificate)
of Convenience and Necessity Authorizing it)
to Construct, Own, Operate, Control,)
Manage and Maintain a High Voltage,)
Direct Current Transmission Line and an)
Associated Converter Station Providing an)
Interconnection on the Maywood-)
Montgomery 345 kV transmission line.)**

Case No. EA-2014-0207

**OBJECTIONS OF GRAIN BELT EXPRESS
TO EXHIBITS OFFERED AT LOCAL PUBLIC HEARINGS**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”), submits the following objections or other responses to Local Public Hearing Exhibits 1 through 23 that were offered at the hearings conducted on August 12 and August 14, 2014.

Exhibit 1. EUCI Conference Brochure related to January 2014 Transmission Siting Conference: Grain Belt Express objects to this exhibit as neither relevant to nor probative of any issue relating to the Company’s application for a certificate of convenience and necessary (“CCN”). The exhibit also constitutes hearsay and lacks sufficient foundation. Grain Belt Express further states that Clean Line Energy Partners, LLC (“Clean Line”) withdrew as a host for this conference and no one from Clean Line spoke at the conference.

Exhibit 2. Email from Marilyn O’Bannon to Mark Lawlor (Jan. 24, 2014): No objection.

Exhibit 3. EUCI announcement related to January 2014 Transmission Siting Conference: Grain Belt Express objects to this exhibit as neither relevant to nor probative of any issue relating to the Company’s application for a CCN. The exhibit also constitutes hearsay and

lacks sufficient foundation. Furthermore, there is nothing in Exhibit 3 that relates to the Company or to Clean Line.

Exhibit 4. Unidentified Photograph: Without the benefit of a transcript,¹ Grain Belt Express is unable to determine if the witness presenting this photograph identified it as showing property where the proposed route of the Grain Belt Express Project will be located. Therefore, in the absence of a transcript, the Company objects to the photograph as not relevant and not probative of any issue in the case.

Exhibit 5. “No Benefits” document: The Company objects to this exhibit as neither relevant to nor probative of any issue in this case as it relates to projects other than the Grain Belt Express Project. The document also constitutes hearsay and lacks foundation.

Exhibit 6. DVD presented by Donna O’Bannon: This exhibit appears to be an audio recording of an open house that was conducted by Company representatives. As such, Grain Belt Express has no objection to Exhibit 6.

Exhibit 7. Louis Meyer Letter (Apr. 25, 2014): Grain Belt Express objects to this letter by Mr. Meyer, a resident of Carbondale, Colorado who owns property in Ralls County, Missouri, as it constitutes hearsay and is duplicative of Mr. Meyer’s testimony.

Exhibit 8. Notes of Louis Meyer on letterhead of Schmueser Gordon Meyer, engineers/surveyors of Glenwood Springs, Colorado: No objection.

Exhibit 9. Photographs of Louis Meyer property: Grain Belt Express is unable to determine if the witness presenting this photograph identified it as showing property where the proposed route of the Grain Belt Express Project will be located. For example, Mr. Meyer spoke of the existence of Native American burial grounds on the property, however the Company is

¹ As of the date of this filing, only the transcript for the local public hearing conducted in Moberly on August 14, 2014 was available on EFIS.

aware of the burial grounds and will avoid them. Therefore, in the absence of a transcript, the Company objects to the photographs as not relevant and not probative of any issue in the case.

Exhibit 10. Copy of Clean Line Energy web page (Apr. 15, 2014): No objection.

Exhibit 11. Aspen Journalism article regarding billionaires of Pitkin County, Colorado: Grain Belt Express objects to this article as neither relevant nor probative of any issue in this proceeding. The article is also hearsay and lacks foundation.

Exhibit 12. Wall Street Journal web page articles (Aug. 8, 2014) regarding Och-Ziff African investments: Grain Belt Express objects to this exhibit as neither relevant nor probative of any issue in this proceeding. The article is hearsay and lacks foundation. The articles concern investments of Och-Ziff Capital Management Group LLC and an investigation being conducted by the U.S. Justice Department and the U.S. Securities and Exchange Commission regarding investments in Africa. This firm owns no interest in either Grain Belt Express or Clean Line. Grain Belt Express also objects to this exhibit on the basis of bias and undue prejudice.

Exhibit 13. House drawings by Schmueser Gordon Meyer labeled “Preliminary/Not for Construction”: Grain Belt Express objects to this exhibit as neither relevant not probative of any issue in this case.

Exhibit 14. Forest Stewardship Plan for Meyer Property in Ralls County: Grain Belt Express objects to this exhibit as neither relevant not probative of any issue in this proceeding. The Company also objects to this exhibit as containing hearsay and lacking foundation.

Exhibit 15. Document entitled “Conclusions after Reviewing all the Evidence”: Grain Belt Express objects to this exhibit as it relates to an unidentified matter before the California Public Utilities Commission that is neither relevant nor probative of any issue related to the application. The exhibit also is hearsay and lacks foundation.

Exhibit 16. Excerpt of Direct Testimony of Grain Belt Express Witness Dr. A. Wayne Galli: No objection.

Exhibit 17. Pages 183 and 71 to Schedule TBG-2, Direct Testimony of Grain Belt Express Witness Timothy B. Gaul: No objection.

Exhibit 18. Schedule MOL-9 to Direct Testimony of Grain Belt Express Witness Mark O. Lawlor: No objection.

Exhibit 19. Depiction of night light: No objection.

Exhibit 20. Statement of Randolph County Assessor Richard Tregnago: No objection.

Exhibit 21. Notes of Witness at Moberly Local Public Hearing: These notes were not identified at the hearing, but appear to be from witness James Ripberger. However, they do not provide “other information,” as stated by Staff Counsel, but are rather a summary of his sworn testimony. See Transcript at 44-45. Because the notes duplicate evidence in the record, Grain Belt Express objects to this exhibit as hearsay.

Exhibit 22. Letter of Rep. John Wright: No objection.

Exhibit 23. Comments of Mid-Missouri Peace Works: No objection.

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record in this case on this 22d day of August 2014.

/s/ Karl Zobrist
Attorney for Grain Belt Express Clean Line LLC