

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, Manage, and Maintain a High Voltage, Direct) Case No. EA-2016-0358
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

Motion of the Missouri Landowners Alliance For the Commission
to take Administrative Notice of Public Comments from Case No. EA-2014-0207

For the reasons set forth below, the Missouri Landowners Alliance (MLA) respectfully asks the Commission to take administrative notice in this case of the public comments filed with the Commission in the 2014 Grain Belt proceeding, Case No. EA-2014-0207.

1. As the Commission knows, this is a high-profile case, involving novel issues and generating an unusual level of public interest. Well before the 2014 case was even concluded, the Commission had already received approximately 7,200 public comments regarding Grain Belt’s proposed transmission line. Only one or two other cases at the Commission were said to have generated a comparable volume of public comments.¹ Public interest in this matter remains high, as is evident from the number of interveners in this case, and the number of people attending the eight local public hearings earlier this month.

2. The MLA is concerned that some people who submitted comments to the Commission in the 2014 case might be under the impression that there is no need or use for them to submit comments again in this pending proceeding. And perhaps they would

¹ Report and Order, Case No. EA-2014-0207, July 1, 2015, p. 16. EFIS No. 547.

be correct in assuming that their comments would as a matter of course carry forward to this proceeding. But the MLA does not know whether that is the case or not, given that those comments are not a matter of record in the pending proceeding. However, those voices still deserve to be heard. And to resolve any doubt about whether or not those comments still merit consideration, the MLA respectfully requests that the Commission take administrative notice of all of the public comments from both sides which were submitted to the Commission in case No. EA-2014-0207.

3. As Grain Belt has pointed out, the Commission certainly has the authority to take administrative notice of material from a previous case.² Doing so here would not have a significant impact on the volume of the evidence which will constitute the record in this case. There is every reason to take notice of the earlier comments from the general public, and no apparent reason for not doing so.

Wherefore, the Missouri Landowners Alliance respectfully asks the Commission to rule that it is taking administrative notice of the public comments which were submitted to the Commission in Case No. EA-2014-0207.

Respectfully submitted,

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² Recommendation of Grain Belt Express Clean Line LLC on Local Public Hearings, p. 1, filed in this case on October 14, 2016, addressing the Commission's authority to take official notice of the testimony in the local public hearings from the 2014 case. EFIS No. 89.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail upon counsel for all parties this 24th day of December, 2016.

/s/ Paul A. Agathen
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