

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

Missouri Landowners Alliance,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No.
	)	
	)	EC-2014-0251
Grain Belt Express Clean Line LLC,	)	
Grain Belt Express Holding LLC, and	)	
Clean Line Energy Partners LLC,	)	
	)	
Respondents.	)	

**MOTION OF RESPONDENTS TO STAY DISCOVERY**

Respondents Grain Belt Express Clean Line LLC, Grain Belt Express Holding LLC, and Clean Line Energy Partners LLC (“Respondents”) move the Commission to suspend discovery in this matter pending the Commission’s ruling on Respondents’ Motion to Dismiss.

In support of their Motion, Respondents state:

1. Complainant Missouri Landowners Alliance (“MLA”) filed a formal complaint on March 11, 2014 regarding the Respondents’ website and certain public statements that they have made, alleging that they violate Sections (12) and (14) of the Commission’s Ex Parte Rules, 4 CSR 240-4.020.

2. The Respondents filed their Motion to Dismiss the complaint on April 14, 2014. MLA opposed the Motion to Dismiss by filing an “Answer” on April 16, and Respondents replied on April 25.

3. Pursuant to the Commission’s order, Staff filed its response on April 28, 2014. Staff declared that the Ex Parte Rules “were never intended to act as a vice grip on any

company's ability to disseminate information to the public," and that "the strict interpretation MLA suggests would place an unnecessary and likely unlawful restriction on the First Amendment rights of both the Respondents and the public." See Staff's Response at 9. Staff concluded that "Respondents have not violated the Commission's Ex Parte Rules."

4. On April 30 MLA served its Third Set of Data Requests upon Respondents.

5. If there is no legal basis to support MLA's complaint and the Motion to Dismiss is granted, there will be no need for discovery and the proceeding will be concluded. Given that the Motion to Dismiss is now ripe for decision, further discovery is neither necessary nor appropriate at this time.

6. Therefore, the Respondents request that all discovery in this matter be stayed and that the parties await the Commission's ruling on the Motion to Dismiss.

WHEREFORE, Respondents move the Commission to stay all discovery until such time as the Commission has ruled upon Respondents' Motion to Dismiss.

Respectfully submitted,

/s/ Karl Zobrist

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Attorneys for Respondents

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Postpone Prehearing Conference was served upon the parties to this Complaint by email or U.S. Mail, postage prepaid, this 2d day of May, 2014.

/s/ Karl Zobrist  
Attorney for Respondents