

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its Certificate)
Of Convenience and Necessity Authorizing it to) File No. EA-2023-0017
Construct, Own, Operate, Control, Manage, and)
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)

Motion to Amend Prior Filing by Errata

Pursuant to Rule 20 CSR 4240-2.080(13) and Rule 20 CSR 4240-2.205, the Missouri Landowners Alliance (MLA) et al. hereby requests that for good cause, it be allowed to correct an earlier filing by errata, as described herein.¹

1. On October 11, 2022, the MLA filed its Opposition to Grain Belt Express' Request for Waiver of 60-day Notice ("Opposition"). It is this October 11, 2022 Opposition which the MLA asks to amend by errata.

2. Grain Belt filed its Application to Amend in this case on August 24, 2022. In its Opposition, the MLA stated that if Grain Belt had filed its Notice of Intended Amendment by June 5, 2022, that Notice would have preceded the Application to Amend by the 60 days normally required by Commission Rule.² (Opposition, pp. 2-3).

3. On October 14, 2022, Grain Belt filed its Reply to the MLA (and others). As Grain Belt correctly noted in that Reply, 60 days in advance of the Application to Amend would have been June 25, 2022, and not June 5, 2022.³

¹ This filing is being submitted on behalf of the MLA, the Eastern Missouri Landowners Alliance d/b/a Show Me Concerned Landowners, Norman Fishel, Gary and Carol Riedel, and Dustin Hudson. For convenience, this group will be collectively referred to herein simply as the MLA

² The 60-day rule is found at Rule 20 CSR 4240-4.017(1).

³ Grain Belt's Reply of October 14, 2022, pp. 5-6.

4. Accordingly, the MLA requests that in its Opposition, the four references to the date of June 5, 2022 be deemed changed to June 25, 2022. Those changes should be made on the following pages of the MLA's Opposition: page 3, lines 1-2; page 3, line 8; page 5, line 9; and page 5, line 13.

5. The requested change in the date does not affect any of the substantive arguments made by any of the parties, including the MLA and Grain Belt. In fact, Grain Belt assumed in its arguments that the MLA had intended to refer to the date of June 25, 2022, and not June 5, 2022.

WHEREFORE, the MLA respectfully asks that its Opposition, filed on October 11, 2022, be deemed amended in the manner described in paragraph 4 above.

Respectfully submitted,

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Certificate of Service

A copy of this Motion was sent by electronic mail this 15th day of October, 2022, to all parties listed on the Commission's official service list.

/s/Paul A. Agathen
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