

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, and)	
Gary Mareschal,)	
)	
Complainants,)	
)	
V.)	
)	Case No. EC-2020-0408
Grain Belt Express Clean Line LLC, and)	
Invenergy Transmission LLC, and)	
Invenergy Investment Company,)	
)	
Respondents)	

MOTION TO AMEND COMPLAINT

Complainants respectfully move to make several minor amendments, as discussed in more detail below, to the Complaint which they filed with the Commission in this case on June 22, 2020.

1. The initial Complaint in this case named Grain Belt Express Clean Line LLC as one of the respondents. As Respondents correctly noted at footnote 1 of their Response to Formal Complaint, prior to the filing of the Complaint the name of that corporate entity had been changed to Grain Belt Express LLC.

2. The sole objective of the proposed amendments to the Complaint is to recognize this name change.

3. To accomplish this objective, Complainants respectfully ask that their initial Complaint be deemed amended in the following three respects:

(1) In the style of the case, the name “Grain Belt Express Clean Line LLC” should be changed to “Grain Belt Express LLC”.

(2) In the first line of paragraph 3 of the complaint, the parenthetical “(Grain Belt)” should be deleted.

(3) After the first sentence in paragraph 3 of the Complaint, the following sentence should be added: “As indicated in Commission Case No. EN-2020-0358, the name Grain Belt Express Clean Line LLC was thereafter changed to Grain Belt Express LLC (hereafter Grain Belt).”

4. These proposed amendments should not be detrimental to the interest of any party to this case. The “Response to Formal Complaint” was filed on behalf of Grain Belt Express LLC (the revised name of the company) and no party has raised the mistake in Grain Belt’s formal name as posing any sort of problem in presenting or litigating this matter at the Commission.

5. If the mistake is to be corrected, the only apparent means of doing so other than a motion such as this would be to withdraw the Complaint, and start the process anew with the corrected name of Grain Belt Express LLC. Complainants respectfully suggest that this would result in a needless waste of resources for all concerned.

Wherefore, Complainants respectfully ask that the Commission deem their original Complaint, as filed on June 22, 2020, to be amended in the manner set forth in subparagraphs (1), (2) and (3) of paragraph 3 above.

Respectfully submitted

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Certificate of Service

I certify that a copy of the foregoing was served this 7th day of August on all parties of record.

/s/ Paul A. Agathen