

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 MISSOURI LANDOWNERS ALLIANCE
FOR WAIVER OF COMMISSION REQUIREMENTS FOR DISTRIBUTION
OF TWO EXHIBITS AT EVIDENTIARY HEARINGS

Comes now the Missouri Landowners Alliance (MLA) and for the reasons set forth below respectfully requests that the Commission waive the requirement, with respect to two exhibits reference hereafter, that copies of exhibits offered at the evidentiary hearings be distributed to counsel for all parties. In support of this Motion, the MLA states as follows:

1. On December 6, 2018, Grain Belt distributed a revised version of Schedules KZ-3 and KZ-4 to the direct supplemental testimony of Mr. Kris Zadlo, eliminating some but not all of the redactions from the original versions filed with the testimony. The revised versions of the two documents were produced in response to the MLA's data request G.90, which asked for unredacted versions of the documents originally filed by Mr. Zadlo. The two documents generally form the basis for the sale of the Grain Belt project to Invenergy.

2. Schedule KZ-3 consists of 60 pages, not counting a number of exhibits thereto which apparently have not yet been supplied to the MLA. Schedule KZ-4 consists of 15

pages, counting two Exhibits. Both documents were already distributed via email by Grain Belt to counsel for all parties on December 6, 2018.

3. The MLA is hopeful that Grain Belt may agree to the removal of additional redactions. But if all redactions are not removed, the MLA anticipates that it may offer either or both of the “less redacted” documents in question into evidence at the hearings scheduled for December 18 and 19. Normally that would require that the MLA provide counsel for all parties with a paper copy of such documents at the time they are offered.

3. Inasmuch as counsel for all parties have already been provided a copy of both documents, this waiver is being requested simply to avoid needless duplication and distribution of paper copies which were already served on counsel electronically by Grain Belt.

4. If the MLA does offer either or both of the documents in question at the evidentiary hearings, it would provide copies to the bench and to the court reporter.

WHEREFORE, if the MLA does offer revised versions of Schedules KZ-3 and/or KZ-4 into evidence at the hearings on December 18-19, it respectfully asks that it be relieved of the obligation to provide that material to counsel for all parties.

Respectfully submitted,

/s/ Paul A. Agathen
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail upon counsel for all parties this 8th day of December, 2018.

/s/ Paul A. Agathen
Paul A. Agathen