

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 to Intervene on Behalf of the Missouri Landowners Alliance

Pursuant to Commission Rule 4 CSR 240-2.075, the Missouri Landowners Alliance (MLA) hereby files its Motion to Intervene. In support of this Motion, the MLA states as follows:

1. The MLA asks that communications regarding this case be directed to its counsel, whose contact information is provided below.
2. The MLA is a Missouri not-for-profit corporation, with over 1,100 members.
3. The MLA expects to oppose Grain Belt’s Application in this case.
4. Membership in the MLA consists for the most part of people who live on or near the proposed route of the Grain Belt transmission line.
5. Some of the MLA’s members live on the right-of-way of the proposed line.

The property of those members might therefore be subject to eminent domain proceedings if the Commission approves Grain Belt’s Application. Other members live close to or in the general vicinity of the proposed right-of-way, and would therefore be affected to varying degrees even if they do not own property on the immediate right-of-way of the proposed line.

6. Intervention by the MLA is a sensible and practicable means for a large number of landowners to be given a voice in a proceeding in which they have a vital interest.

7. For the reasons stated above, the MLA and its members have interests which are different from that of the general public, and those interests would be adversely affected if Grain Belt's Application is approved by the Commission.

Wherefore, the Missouri Landowners Alliance respectfully asks the Commission to grant this Motion to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen  
Paul A. Agathen  
Attorney for the Missouri Landowners Alliance  
485 Oak Field Ct.  
Washington, MO 63090  
(636)980-6403  
[Paa0408@aol.com](mailto:Paa0408@aol.com)  
MO Bar No. 24756

#### CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail upon counsel for all parties this 12th day of September, 2016.

/s/ Paul A. Agathen  
Paul A. Agathen