

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-2014-0207  
Current Transmission Line and an Associated Converter )  
Station Providing an interconnection on the Maywood- )  
Montgomery 345 kV Transmission Line )

NOTICE OF INTENT TO OFFER PORTIONS OF  
DEPOSITION OF MATTHEW MICHELS

On July 10, 2014, counsel for the Missouri Landowners Alliance (Alliance) deposed Mr. Matthew Michels, an employee of Ameren Corporation. That deposition dealt primarily with Ameren Missouri’s Integrated Resource Plans, as filed with this Commission.

A copy of that deposition will be filed with the rebuttal case of the Alliance on or about September 15, 2014. At the evidentiary hearings, pursuant to Missouri Supreme Court Rule 57.07(a)<sup>1</sup> and Commission Rule 4 CSR 240-2.090(1), the Alliance will offer into evidence certain portions of that deposition, as listed at Exhibit 1 to this Notice. For the convenience of the parties, the portions which will be offered by the Alliance were also highlighted in yellow on the copy filed with the Commission, with three exceptions: pages 1-18 were not highlighted; the errata sheets at pages 67 were not highlighted; and none of the deposition exhibits were highlighted.

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<sup>1</sup> Rule 57.07(a) provides as follows: “(a) **Use of Depositions.** Any part of a deposition that is admissible under the rules of evidence applied as though the deponent were testifying in court may be used against any party who was present or represented at the taking of the deposition or who had proper notice thereof. Depositions may be used in court for any purpose.”

The copy being filed with the Commission includes by interlineations the changes made by the deponent on the errata sheets at page 67. For ease in identification, exhibit number designations were also added to each page of each of the deposition exhibits.

/s/ Paul A. Agathen

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#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document and Exhibit 1 thereto were served upon the parties to this case by email or U.S. Mail, postage prepaid, this 15th day of September, 2014.

/s/ Paul A. Agathen

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List of Portions of Deposition of Matthew Michels  
To Be Offered Into Evidence

Pages 1-18

Page 22, lines 1-14

Page 23, lines 2-15

Page 23, line 23 – page 25, line 21

Page 26, line 5 – page 27, line 15

Page 29, line 22 – page 31, line 8

Page 34, line 15 – page 36, line 11

Page 38, line 24 – page 40, line 15

Page 41, line 14 – page 43, line 14

Page 43, line 20 – page 44, line 9

Page 46, line 21 – page 48, line 4

Page 48, line 11 – page 50, line 5

Page 52, line 24 – page 54, line 6

Page 63, lines 2 – 22

Pages 67 (errata sheets)

Deposition Exhibits A through E (other than Figures 5.7 & 5.8 at page 32, Chapter 5 of Exhibit A, which were color-coded in the original document).