

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt Express)
Clean Line LLC for Approval of its Acquisition by) No. EM-2019-0150
Invenergy Transmission LLC)

APPLICATION TO INTERVENE
OF THE MISSOURI LANDOWNERS ALLIANCE

Comes now the Missouri Landowners Alliance (“MLA”) and pursuant to Commission Rule 4 CSR 240-2.075 respectfully applies for intervention as a party in this case. In support of this Application, the MLA states as follows:

1. The MLA asks that communications regarding this case be directed to its attorney, whose contact information is provided below.

2. The MLA is a non-profit corporation in good standing organized under the laws of the state of Missouri, with over 1,100 members. Membership consists for the most part of people who live on or near the proposed route of the proposed Grain Belt project, as described by Grain Belt in Case No. EA-2016-0358.

3 The MLA is an intervener in Grain Belt’s application for a CCN in Case No. EA-2016-0358, and intervened in the 2014 CCN case as well. It expects to oppose the joint Application filed in this case by Grain Belt and Invenergy.

4. The members of the MLA who live on the proposed transmission line right of way might be subject to eminent domain proceedings if the Grain Belt project is approved. Those who live near the right-of-way would also be affected to varying degrees by the presence of the proposed line and supporting steel structures.

5. The MLA understands that if the Commission does not approve the sale of Grain Belt to Invenergy in this case, that Grain Belt would not have access to the

resources of Invenergy to complete the Project. This in turn could affect the ability of Grain Belt to construct the proposed line. Therefore, as opponents of the Project, the MLA and its members have a definite interest in the outcome of this proceeding.

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. The MLA's intervention in this case would therefore serve the public interest.

7. For the reasons stated above, the MLA and its members have interests which are different from that of the general public. Those interests could be adversely affected if the Application in this case from Grain Belt and Invenergy is approved.

Wherefore, the MLA respectfully asks the Commission to grant this Application to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen
Attorney for the Missouri Landowners Alliance
485 Oak Field Ct., Washington, MO 63090
(636)980-6403
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 13th day of February, 2019.

/s/ Paul A. Agathen
Paul A. Agathen