

**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) **File No. EA-2014-0207**
Current Transmission Line and an Associated Converter)
Station Providing an Interconnection on the Maywood –)
Montgomery 345 kV Transmission Line)

**APPLICATION TO INTERVENE
OF UNITED FOR MISSOURI**

COMES NOW United For Missouri, Inc. (“UFM”), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies to intervene as a party in the above referenced case. In support of this Application, UFM states as follows:

1. UFM is a nonprofit Mutual Benefit corporation organized under the laws of the state of Missouri. A copy of UFM’s Articles of Incorporation is attached hereto as Exhibit A. Formed in July 2010, UFM is committed to serving its members and the public in educating the public about and supporting economic policies in the state that will achieve growth, opportunity and prosperity. A component of economic policies that will achieve growth, opportunity and prosperity is the protection of land and property rights against the use of the state’s power of eminent domain for private business interests. UFM seeks to help state legislators, state-wide elected officials, state agencies, the media and individual citizens understand why policies that promote the American free enterprise system is the best method to ensuring prosperity for all Missourians.

2. On March 26, 2014, Grain Belt Express Clean Line, LLC (“Grain Belt”) filed its Application for a Certificate of Convenience and Necessity (“Application”) in the above referenced File.

3. On March 27, 2014, the Commission issued its Order Directing Notice, Setting Intervention Deadline, and Directing Filing of Staff Recommendation. It established a deadline to file Applications to Intervene of April 25, 2014.

4. UFM's interest in this matter relates to land property rights and the ability of property owners in the state to exercise their land property rights in a free economy. This interest is different than the interest of the general public. UFM believes that its intervention and participation in this proceeding would serve the public interest in that it will provide the Commission with an additional perspective and help refine issues. UFM seeks to become a party to this case for all purposes.

5. Correspondence, communications, orders and the decisions in this matter should be addressed to:

Carl Bearden
Executive Director
United for Missouri
P.O. Box 11466
Springfield, Missouri 65808
carl@unitedformissouri.org
Phone: 888-332-3811

David C. Linton
314 Romaine Spring View
Fenton, MO 63026
jdlinton@reagan.com
Phone: 314-341-5769

6. UFM opposes the Application filed by Grain Belt. As described in the Application, the Grain Belt Express Project is an approximately 750-mile, overhead, HVDC Line traversing the state of Missouri. Grain Belt claims in its application, "Because Grain Belt Express will employ a participant-funded or "shipper pays" model, the costs of the Project will not be borne by ratepayers through the cost allocation processes of the Southwest Power Pool,

Inc. (“SPP”), Midcontinent Independent System Operator, Inc. (“MISO”), or PJM Interconnection, LLC (“PJM”). Grain Belt Express has applied to the Federal Energy Regulatory Commission (“FERC”) for negotiated rate authority to charge transmission service rates to direct users of the Project.”¹ In the event the granting of the Application grants Grain Belt the power of eminent domain, such a grant would authorize the use of the power of eminent domain for private purposes, a use of such power to which UFM is opposed.

WHEREFORE, for the foregoing reasons, United for Missouri respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198
314 Romaine Spring View
Fenton, MO 63026
Telephone: 314-341-5769
Email: jdinton@reagan.com

Filed: April 24, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record, as identified below, in File No. EA-2014-0207 via electronic transmission this 24th day of April, 2014.

**Missouri Public Service
Commission**
Office General Counsel
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

**Missouri Public Service
Commission**
Nathan Williams
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Nathan.Williams@psc.mo.gov

Office of the Public Counsel
Lewis Mills
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@ded.mo.gov

¹ See Application, p. 4.

**Show Me Concerned
Landowners**

Terry M Jarrett
514 E. High Street, Suite 22
Jefferson City, MO 65101
terry@healylawoffices.com

**Missouri-American Water
Company**

Timothy W Luft
727 Craig Road
St. Louis, MO 63141
Timothy.Luft@amwater.com

Ameren Missouri

James B Lowery
111 South Ninth St., Suite 200
P.O. Box 918
Columbia, MO 65205-0918
lowery@smithlewis.com

Brubaker & Associates, Inc.

Maurice Brubaker
P.O. Box 412000
St. Louis, MO 63141-2000
mbrubaker@consultbai.com

Brubaker & Associates, Inc.

Greg Meyer
P.O. Box 412000
St. Louis, MO 63141-2000
gmeyer@consultbai.com

David and Jackie McKnight

Paul A Agathen
485 Oak Field Ct.
Washington, MO 63090
paa0408@aol.com

**Eastern Missouri Landowners
Alliance**

Terry M Jarrett
514 E. High Street, Suite 22
Jefferson City, MO 65101
terry@healylawoffices.com

**Grain Belt Express Clean Line,
LLC**

Lisa A Gilbreath
4520 Main, Suite 1100
Kansas City, MO 64111
lisa.gilbreath@dentons.com

**Grain Belt Express Clean Line,
LLC**

Cary Kottler
1001 McKinney, Ste. 700
Houston, TX 77002
ckottler@cleanlineenergy.com

**Grain Belt Express Clean Line,
LLC**

Karl Zobrist
4520 Main Street, Suite 1100
Kansas City, MO 64111
karl.zobrist@dentons.com

**Grain Belt Express Clean Line,
LLC**

Erin Szalkowski
1001 McKinney Street, Ste. 700
Houston, TX 77002
eszalkowski@cleanlineenergy.com

**Grain Belt Express Clean Line,
LLC**

Andrew Zellers
4520 Main Street, Ste. 1100
Kansas City, MO 64111
andy.zellers@dentons.com

IBEW Local Union 1439

Sherrie Hall
7730 Carondelet Ave., Ste 200
St. Louis, MO 63105
sahall@hammondshinners.com

IBEW Local Union 1439

Emily Perez
7730 Carondelet Ave., Suite 200
St. Louis, MO 63105
eperez@hammondshinners.com

IBEW Local Union 2

Sherrie Hall
7730 Carondelet Ave., Ste 200
St. Louis, MO 63105
sahall@hammondshinners.com

IBEW Local Union 2

Emily Perez
7730 Carondelet Ave., Suite 200
St. Louis, MO 63105
eperez@hammondshinners.com

IBEW Local Union No. 53

Sherrie Hall
7730 Carondelet Ave., Ste 200
St. Louis, MO 63105
sahall@hammondshinners.com

IBEW Local Union No. 53

Emily Perez
7730 Carondelet Ave., Suite 200
St. Louis, MO 63105
eperez@hammondshinners.com

**Kansas City Power & Light
Company**

Don Frerking
PO Box 418679
Kansas City, MO 64141-9679
don.frerking@kcpl.com

**Kansas City Power & Light
Company**

Lois J Liechti
P.O. Box 418679
Kansas City, MO 64141-9679
lois.liechti@kcpl.com

**Kansas City Power & Light
Company**

Nicole Wehry
P.O. Box 418679
Kansas City, MO 64141-9679
nicole.wehry@kcpl.com

Missouri Division of Energy

Mary Ann Young
301 W. High St., Truman State
Office Bldg, Room 720
P.O. Box 1766 Jefferson City, MO
65102
Jefferson City, MO 65109-1766
maryann.young@ded.mo.gov

Missouri Farm Bureau

Terry M Jarrett
514 E. High Street, Suite 22
Jefferson City, MO 65101
terry@healylawoffices.com

Missouri Landowners Alliance

Paul A Agathen
485 Oak Field Ct.
Washington, MO 63090
paa0408@aol.com

/s/ David C. Linton

**ARTICLES OF INCORPORATION
OF
UNITED FOR MISSOURI**

A Missouri Nonprofit Corporation

The undersigned natural person of the age of eighteen years or more for the purpose of forming a corporation under the Nonprofit Corporation Law of Missouri adopts the following Articles of Incorporation:

ARTICLE I

The name of the Corporation is: United for Missouri.

ARTICLE II

This corporation is a Mutual Benefit corporation.

ARTICLE III

The period of duration of the corporation is Perpetual.

ARTICLE IV

The name and street address of the initial Registered Agent and Registered Office in Missouri is Eleanor A. Maynard, Law Offices of Eleanor A. Maynard, LLC, 116 Maple Hill Lane, Labadie, MO 63055.

ARTICLE V

The name and addresses of the incorporator is Eleanor A. Maynard, 116 Maple Hill Lane, Labadie, MO 63055.

ARTICLE VI

The corporation shall have no members for purposes of Chapter 355 RSMo. The affairs of the corporation shall be managed by its Board of Directors. The number of Directors and their terms shall be as provided in the Bylaws, provided that there shall not be less than three Directors. The Directors of the corporation shall be elected in the manner described in the Bylaws. Bylaws of the corporation, consistent with these Articles, shall be adopted by the Board of Directors, and may be amended in the manner provided in the Bylaws.

ARTICLE VII

These Articles may be amended by the Board of Directors in the manner provided in the _____

Exhibit A



Bylaws.

ARTICLE VIII

In the event of dissolution, the Board of Directors shall, after paying or making provision for payment of all the liabilities of the corporation, distribute all assets of the corporation to one or more organizations then qualified under sections 501(c)(3) or 501(c)(4) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Internal Revenue Law) selected by the Board of Directors of the corporation. Any such assets not so disposed of shall be disposed of by the Circuit Court of the city or county in which the principal office of the corporation is then located to such organization or organizations as said court shall determine and as are then qualified as exempt under section 501(c)(3) or 501(c)(4) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Internal Revenue Law).

ARTICLE IX

The corporation shall have all the powers permitted a corporation that is both a nonprofit corporation under the Missouri Nonprofit Corporation Act and as an exempt organization described in section 501(c)(4) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Internal Revenue Law).

ARTICLE X

The corporation is organized, and shall be operated, exclusively for the promotion of the common good and general welfare of the people of the State of Missouri within the meaning of section 501(c)(4) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Revenue Law). No part of the net earnings of the corporation shall inure to the benefit of, or be distributed to, its Trustees, Directors, Officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in this Article. Any other provision of these Articles to the contrary notwithstanding, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from the Federal income tax under section 501(c)(4) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Internal Revenue Law) and (b) by a corporation organized under the Missouri Nonprofit Corporation Law as now existing or hereafter amended.

ARTICLE XI

The provisions of this Article shall be in the nature of a contract between the corporation and each of its Directors and Officers made in consideration of such person's continued service

to the corporation. The protection afforded to each Director or Officer by the provisions of this Article shall survive such person's term of office or employment. This Article may not be repealed, nor may the benefits to the Directors and Officers afforded hereby diminished, except as to liability accruing in respect of acts or omissions occurring after the date of such repeal or modification.

The corporation shall hold harmless and indemnify each Director and Officer to the fullest extent authorized or permitted by Missouri Revised Statute Section 355.476 or any other or additional statutory provisions which are hereafter adopted authorizing or permitting such indemnification.

The corporation may purchase and maintain for the benefit of each Director or Officer, as named insured or additional insured, a policy or policies of general comprehensive liability insurance (covering claims arising out of death, illness, or injury or arising out of property loss or damage) and directors' and officers' liability insurance (covering claims arising out of wrongful acts or omissions) in respect of liabilities asserted against and/or incurred by its Directors and Officers in either such capacity or otherwise in the performance of their services for the corporation.

In addition to the foregoing, and subject only to the exclusions set forth in this Article, the corporation shall, to the fullest extent authorized or permitted by the provisions of Section 355.476 RSMo., hold harmless and indemnify each Director and Officer: (a) against any and all expenses (including attorneys' fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by such Director or Officer in connection with any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative (including an action by or in the right of the corporation) to which such Director or Officer is, was, or at any time became a party, or is threatened to be made a party, by reason of the fact that such Director or Officer is, or was, or at any time becomes a Director, Officer, employee or agent of the corporation, or is or was serving or at any time serves at the request of the corporation as a Director, Officer, employee, or agent of another corporation, partnership, joint venture, trust, or other enterprise; and (b) otherwise to the fullest extent as may be provided to such Director or Officer by the corporation under the non-exclusivity provision of the foregoing statute.

No indemnity pursuant to this Article shall be paid by the corporation: (a) except to the extent the aggregate of losses to be indemnified thereunder exceeds the amount of such losses for which the Director or Officer is indemnified either pursuant to this Article or pursuant to any insurance of the type referred to in this Article purchased and maintained by the corporation; (b) in respect of remuneration paid to such Director or Officer if it shall be determined by a final decision by a court having jurisdiction in the matter that such remuneration was in violation of law; (c) on account of such Director's or Officer's conduct which is finally adjudged by a court having jurisdiction of the matter to have been knowingly fraudulent, deliberately dishonest or willful misconduct; or (d) if the final decision by a court having jurisdiction in the matter shall determine that such indemnification is not lawful.

All agreements and obligations of the corporation contained in this Article shall continue during the period the Director or Officer is a Director or Officer of the corporation (or is or was serving at the request of the corporation as a director, officer, employee, or agent of another corporation, partnership, joint venture, trust, or other enterprise) and shall continue thereafter so long as the Director or Officer shall be subject to any possible claim or threatened, pending, or completed action, suit, proceeding, whether civil, criminal, or investigative, by reason of the fact that he or she was a Director or Officer of the corporation or was serving in any other capacity referred to in this Article.

The corporation shall pay, in advance of the final disposition of the action, suit, or proceeding, all reasonable expenses of the Director or Officer incurred in defending any civil or criminal action, suit, or proceeding against him or her, provided he or she shall have agreed to reimburse the corporation if and to the extent that it shall be determined that he or she is not entitled to be indemnified by the corporation for such expenses.

ARTICLE XII

The effective date of this document is the date filed by the Secretary of State of Missouri.

In affirmation thereof, the facts stated above are true and correct:
(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040 RSMo.)

Executed this 30th day of June, 2010, by the Incorporator.



Eleanor A. Maynard

State of Missouri



Robin Carnahan
Secretary of State

CERTIFICATE OF INCORPORATION MISSOURI NONPROFIT

WHEREAS, Articles of Incorporation of

United for Missouri
N01068656

have been received and filed in the Office of the Secretary of State, which Articles, in all respects, comply with the requirements of Missouri Nonprofit Corporation Law;

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of the State of Missouri do by virtue of the authority vested in me by law, do hereby certify and declare this entity a body corporate, duly organized this date and that it is entitled to all rights and privileges granted corporations organized under the Missouri Nonprofit Corporation Law.

IN TESTIMONY WHEREOF, I hereunto
set my hand and cause to be affixed the
GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, this
30th day of June, 2010.

Robin Carnahan

Secretary of State

