

# Commission Exhibit No. 1

promulgated by the commission upon a finding of good cause.” The efficient processing of this case constitutes good cause.

## **II. Joint Stipulations**

5. Joint Movants have agreed to the following stipulations:

- (a) Grain Belt issued a Press Release on August 25, 2020, which is attached to the Complaint as Exhibit 1;
- (b) On September 24 and 25, 2020, Grain Belt mailed a letter to Missouri landowners who were mailed form easement agreements but had not yet signed them. A copy of that letter is attached to this Joint Motion as Exhibit A;
- (c) Grain Belt has not yet sought Commission permission to make changes to the Project as it was approved in the CCN case. The Press Release states “Grain Belt Express will seek approvals to the extent necessary for expanded delivery to Kansas and Missouri as well as for beginning the first phase of project construction prior to Illinois regulatory approval”;
- (d) Grain Belt has begun acquiring easement rights along the certificated route but has not begun construction of the Project;
- (e) The sample landowner letter posted on Grain Belt’s website states that Grain Belt is working to add broadband infrastructure along the route to support rural high-speed internet access. A copy of Grain Belt’s sample landowner letter is attached as Exhibit B to this Joint Motion;
- (f) In their respective legal briefs, Joint Movants may cite to any portion of the record in the CCN case;
- (g) Joint Movants agree that the issue in this Complaint is limited to whether Respondents’ contemplated changes to the Project invalidate the CCN granted to Grain Belt in the CCN case.

6. Joint Movants agree and propose that they file simultaneous Initial Briefs regarding the legal issue on or before October 16, 2020, and file simultaneous Reply Briefs on or before October 23, 2020.

WHEREFORE, in order to bring the legal issue to the attention of the Commission in an expeditious manner for resolution and decision, the Joint Movants respectfully request that the Commission (1) suspend the October 3, 2020 date for Respondents to file an Answer or Response