

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its Certificate)
Of Convenience and Necessity Authorizing it to) File No. EA-2023-0017
Construct, Own, Operate, Control, Manage, and)
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)

Motion to Intervene by Norman Fishel

Pursuant to Rule 20 CSR 4240-2.075 Mr. Norman Fishel hereby files his Motion to Intervene. In support of this Motion, the movant states as follows:

1. The mailing address, email address and telephone number of movant’s attorney are provided at the conclusion of this Motion.
2. At this time, movant expects to oppose Grain Belt’s Application in this case.
3. Mr. Fishel has an ownership interest in three parcels of land in Monroe County, Missouri, which would be crossed by Grain Belt’s proposed HVDC line, as approved by the Commission in Case No. EA-2016-0358. Grain Belt does not have an easement for any of these proposed crossings. In addition, Mr. Fishel has an ownership interest in a parcel of land in Monroe County which he understands would be only about two miles west of the new location for Grain Belt’s Missouri converter station.
4. For the reasons stated above, Mr. Fishel has an interest in this proceeding which is different from that of the general public, and that interest would be adversely affected if Grain Belt’s Application in this case is approved by the Commission.
5. Movant is aware that Grain Belt has not yet filed its Application in this case. However, Commission Rule 20 CSR 4240-2.075 provides that Motions to Intervene should be filed “within thirty (30) days after the commission issues its order giving notice

of the case.” While it is not clear, the Commissions Order in this case of July 13, 2022 could arguably constitute such notice, and thereby begin the 30-day period for filing Motions to Intervene. Thus out of an abundance of caution, Mr. Fishel is filing for intervention before Grain Belt files its Application in this case.

Wherefore, Mr. Fishel respectfully asks the Commission to grant this Motion to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen
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Certificate of Service

A copy of this Motion was sent by electronic mail this 12th day of August, 2022, to counsel for Grain Belt Express LLC, Staff Counsel, and the Office of Public Counsel.

/s/Paul A. Agathen
Paul A. Agathen