

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)

**SHOW ME CONCERNED LANDOWNERS'S RESPONSE TO GRAIN BELT
EXPRESS CLEAN LINE LLC'S MOTION IN LIMINE REGARDING THE
ISSUE OF EMINENT DOMAIN**

COMES NOW the Show Me Concerned Landowners (Show Me), by and through its counsel of record, and for its response to Grain Belt Clean Line LLC's (Grain Belt) motion in limine to exclude and prohibit testimony relating to public policy questions regarding the use of eminent domain, as well as property value and compensation issue related to the use of eminent domain, states as follows:

1. In its Motion in Limine, Grain Belt asks the Commission to exclude parts of Show Me witness Charles Kruse's rebuttal testimony relating to eminent domain.
2. On November 3, 2014, the Missouri Farm Bureau Federation (Farm Bureau) filed its response to Grain Belt's Motion in Limine to exclude all of Farm Bureau witness Blake Hurst's rebuttal testimony relating to eminent domain.
3. Show me adopts the position, arguments and reasoning set out in Farm Bureau's response, and incorporates Farm Bureau's response herein by reference in its entirety.

WHEREFORE, Show Me respectfully asks the Commission to issue an Order denying Grain Belt's Motion in Limine, and for any other relief that is appropriate under the circumstances.

Respectfully submitted,

HEALY & HEALY,
ATTORNEYS AT LAW, LLC



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 3rd day of November, 2014.



Terry M. Jarrett