

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-2016-0358
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

RESPONSE OF THE MISSOURI LANDOWNERS ALLIANCE TO
OBJECTIONS OF GRAIN BELT EXPRESS TO EXHIBITS
OFFERED AT LOCAL PUBLIC HEARINGS

Pursuant to Rule 4 CSR 240-2.080(13), the Missouri Landowners Alliance (MLA) hereby offers this Response to the Objections filed by Grain Belt Express (GBE) on December 27, 2016 to certain of the exhibits offered at the local public hearings.

1. Nearly all of GBE’s objections are based at least in part on grounds of hearsay, and most involve extracts from various publications, such as Midwest Today magazine and the Moberly Monitor-Index.¹

2. The MLA will not attempt here to argue the technical merits of GBE’s objections. It will simply note that in the past, the Commission has apparently held testimony and exhibits offered at local public hearings to a more lenient standard than is applied to the written testimony presented at the evidentiary hearings. For example, in the 2014 Grain Belt case, GBE raised objections to a number of the exhibits offered at the public hearings, nearly all of which included the ground of hearsay.² One such objection was to an Aspen Journalism article, Exhibit No. 11. The exhibit listed a number of billionaires who owned property in and around Aspen, Colorado, including a Daniel Ziff

¹ See objections to Exhibits 22-35.

² Objections of Grain Belt Express to Exhibits Offered at Local Public Hearings, Case No. EA-2014-0207, filed August 22, 2014.

who owned \$44 million in real estate there.³ While the Commission did sustain six of GBE's twelve objections in that case, among those overruled was the objection to the Aspen Journalism article at Exhibit 11.⁴

3. The MLA respectfully requests that the Commission take a similar, more lenient approach in this case with respect to the Exhibits offered by the general public at the local public hearings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by electronic mail upon counsel for all parties this 29th day of December, 2016.

/s/ Paul A. Agathen
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³ Exhibit 11, page 20.

⁴ Order Regarding Local Public Hearing Exhibits, EA-2014-0207, October 10, 2014; EFIS No. 232.