

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Grain)	
Belt Express Clean Line LLC for Certificate)	
of Convenience and Necessity Authorizing)	
it to Construct, Own, Operate, Control,)	Case No. EA-2016-0358
Manage and Maintain a High Voltage,)	
Direct Current Transmission Line and an)	
Associated Converter Station Providing an)	
Interconnection on the Maywood-)	
Montgomery 345 kV transmission line.)	

**OPPOSITION OF GRAIN BELT EXPRESS CLEAN LINE LLC TO
MISSOURI LAND OWNERS ALLIANCE’S MOTION TO STRIKE**

Comes now, Grain Belt Express Clean Line LLC (Grain Belt Express) and files its Opposition to the Motion to Strike Certain Portions of the Supplemental Direct Testimony of Witnesses Kris Zadlo and Andrea Hoffman, as filed by the Missouri Landowners Association (MLA) on November 15, 2018. In support of its Opposition, Grain Belt Express states as follows:

1. This case is before the Missouri Public Service Commission (Commission) on remand from the Missouri Supreme Court, which reversed the Commission’s August 16, 2017 Report and Order denying Grain Belt Express’ application for a certificate of convenience and necessity (CCN). Grain Belt Express and MLA agree that the primary purpose of the procedure on remand is to review any evidence that has materially changed since August 16, 2017.

2. Pursuant to the procedural schedule set by the Commission, on November 12, 2018, Grain Belt Express filed the Supplemental Direct Testimony of six witnesses, including Kris Zadlo and Andrea Hoffman. On November 15, 2018, MLA filed its Motion to Strike, complaining that relatively small portions of Mr. Zadlo’s and Ms. Hoffman’s testimony reiterate the evidence that was presented in the prior phase of this case.

3. The Motion to Strike is meritless. Given the passage of time since August 16, 2017, some background and context is required for the Commission to understand why some facts have changed and others have not. The portions of Mr. Zadlo's testimony that MLA seeks to strike fall within the section of Mr. Zadlo's testimony titled "Overview of the Tartan Criteria." Mr. Zadlo is simply providing the Commission with a complete picture of how Grain Belt Express continues to satisfy the five Tartan criteria. The portion of Ms. Hoffman's testimony that MLA seeks to strike is a single sentence that simply provides context for the Commission's public interest standard. This background information and context is provided for the benefit of the parties and the Commission. No party, including the MLA, is prejudiced by this information.

4. For the foregoing reasons, the Commission should deny MLA's Motion to Strike.

Respectfully submitted,

/s/ Frank A. Caro, Jr.

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Attorneys for Grain Belt Express Clean Line LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served or caused to be served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the secretary of the commission.

/s/ Frank A. Caro, Jr.
Frank A. Caro, Jr.

Dated: November 20, 2018