

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 the Missouri Landowners Alliance

Pursuant to Rule 20 CSR 4240-2.075 the Missouri Landowners Alliance (MLA)
hereby files its Motion to Intervene. In support of this Motion, the MLA states as
follows:

1. The MLA is a Missouri not-for-profit corporation, incorporated under the laws of Missouri, with over 1,100 members.
2. The mailing address, email address and telephone number of the MLA's attorney are provided at the conclusion of this Motion.
3. At this time, the MLA expects to oppose Grain Belt's Application in this case.
4. Membership in the MLA consists in large part of people who live on or in the general vicinity of the proposed route of the Grain Belt transmission line, and who would therefore be affected to varying degrees by construction of the proposed line. Most if not all of the MLA's members joined the organization because of their opposition to the proposed Grain Belt line. Accordingly, most members would be opposed to the Application seeking approval for an amendment or grant of a Certificate of Convenience and Necessity (CCN) to Grain Belt in this proceeding.

5. Intervention by the MLA is a sensible and practicable means for a large number of landowners to be given a voice in this proceeding, without the need for all such individuals to intervene individually on their own behalf.

6. The MLA was granted intervention by the Commission in the two earlier cases involving applications for a CCN for the Grain Belt line: Case Numbers EA-2014-0207 and EA-2016-0305. The MLA participated fully in both cases.

7. For the reasons stated above, the MLA and its members have interests which are different from that of the general public, and those interests could in many instances be adversely affected if Grain Belt's Application is approved by the Commission.

8. The MLA 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 Commission's 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, the MLA is filing for intervention before Grain Belt files its Application in this case.

Wherefore, the Missouri Landowners Alliance respectfully asks the Commission to grant this Motion to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen
Paul A. Agathen
Attorney for the MLA
485 Oak Field Ct.
Washington, MO 63090
(636)980-6403
Paa0408@aol.com
MO Bar No. 24756

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