

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)

**STIPULATION AS TO THE ADMISSION OF FRANK COSTANZA’S TESTIMONY
AND MOTION FOR EXPEDITED TREATMENT
TO BE EXCUSED FROM THE EVIDENTIARY HEARING**

TradeWind Energy, Inc. (“**TradeWind**”) respectfully requests that the Public Service Commission (“**Commission**”) accept the admission of Frank B. Costanza’s (“**Mr. Costanza**”) testimony, filed and served on all parties on September 15, 2014 and, therefore, excuse Mr. Costanza and TradeWind from appearing at the evidentiary hearing scheduled in this matter.

TradeWind has exchanged emails with all parties of record in this matter. All parties have waived cross-examination of Mr. Costanza. Likewise, TradeWind has waived cross-examination of all witnesses in this matter, along with opening statement and closing argument.

Missouri Landowners Alliance (“**MLA**”) waives the cross-examination of Mr. Costanza with two caveats. First, MLA requests that Mr. Costanza’s response to MLA’s Data Request 2.1 may be received as an exhibit in conjunction with Mr. Costanza’s testimony. As the information in the response is provided in regard to Mr. Costanza’s testimony, TradeWind has no objection and will provide all parties with a copy of the response to Data Request 2.1. Second, MLA reserves the right to object to the admission of Mr. Costanza’s testimony on the basis that TradeWind did not respond to certain data requests which were the subject of a Protective Order entered by the Commission on September 24, 2014. Based on the Commission’s Protective

Order, TradeWind asserts that any objection by MLA should be overruled and that Mr. Costanza's testimony should be admitted into evidence. However, TradeWind understands that MLA may need to object to preserve its legal record.

TradeWind reserves the right to file a Position Statement and post-hearing briefing, if necessary and proper, to assist the Commission in the disposition of this matter.

Pursuant to 4 CSR 240-2.080(14), TradeWind respectfully requests an expedited ruling on this Motion. Granting the requested relief would cause no undue prejudice to any party as all parties have had an opportunity to review the testimony filed by Mr. Costanza and have agreed to waive cross-examination of him. In addition, granting the requested relief would be in the best interests of the parties and the Commission as it will expedite the evidentiary hearing. This Motion was filed as soon as TradeWind had reached an agreement with all parties regarding the testimony of Mr. Costanza. Due to the quickly approaching evidentiary hearing beginning on November 10, 2014, TradeWind respectfully requests a ruling on or before November 7, 2014.

WHEREFORE, TradeWind Energy, Inc. respectfully requests that the Public Service Commission accept the admission of Frank Costanza's testimony, with TradeWind Energy Inc.'s response to Missouri Landowners Alliance's Data Request 2.1 as an exhibit, subject to Missouri Landowners Alliance's objection referenced above, and excuse TradeWind Energy, Inc. and Frank Costanza from appearing at the evidentiary hearing.

Dated: November 3, 2014

Respectfully Submitted,

DOUTHIT FRETS ROUSE GENTILE &
RHODES, LLC

By: /s/ Christopher L. Kurtz, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid this 3rd day of November 2014.

/s/ Christopher L. Kurtz, Esq.

Christopher L. Kurtz