

**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 Construct,)
Own, Operate, Control, Manage, and)
Maintain a High Voltage, Direct Current)
Transmission Line and Associated)
Converter Station)

File No. EA-2023-0017

APPLICATION TO INTERVENE
BY THE MISSOURI CORN GROWERS ASSOCIATION

COMES NOW the Missouri Corn Growers Association (“MCGA”), by and through undersigned counsel, and pursuant to Commission Rule 4 CSR 240-2.075 respectfully applies for intervention as a party in this matter. In support of this application, Missouri Corn Growers Association states as follows:

1. The Missouri Corn Growers Association is a nonprofit corporation in good standing organized under the laws of Missouri. Established in 1978, MCGA is a grassroots organization of farm-members dedicated to increasing the profitability of corn production by developing and expanding corn markets, collecting and distributing information, building coalitions with organizations and industries, and participating in the governmental process. MCGA is highly involved in promoting environmental stewardship while protecting the producer’s right to farm profitably. MCGA has seven Districts spanning the state, and each District is represented by officers.
2. Correspondence, communications, orders and the decision in this matter should be addressed to Missouri Corn Growers Association’s attorney Brent Haden at:

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3. On September 1, 2022, the Commission issued an Order directing interested parties to move to intervene in this matter by September 30, 2022, and thus this Application is timely.
4. The Missouri Corn Growers Association has long defended property owners and property rights in cases involving takings of farms or ranches under the eminent domain doctrine. MCGA believes that the benefits claimed by Grain Belt Express LLC do not justify the granting of a CCN, or the inevitable exercise of eminent domain powers that will go with it, to Grain Belt Express LLC, and that the interest claimed by Grain Belt Express LLC is opposed to both the general public interest and the interests of Missouri's property owners.
5. The interest of Missouri Corn Growers Association and its members, and MCGA's position as a protector of property rights for farmers and ranchers are different than the public interest and may be adversely affected by a final order in Grain Belt's favor.
6. The Missouri Corn Growers Association opposes the Application filed by Grain Belt Express LLC and reserves the right to provide the Commission with more detailed positions on Grain Belt Express LLC's proposals and testimony submitted in this case.
7. The Missouri Corn Growers Association believes that its intervention and participation on behalf of its members in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case, and MCGA wishes to become a party to this case for all purposes.

WHEREFORE, the Missouri Corn Growers Association respectfully requests that the Commission grant its Application to Intervene in this matter, entitling it to fully participate in this proceeding.

Respectfully submitted,

HADEN & COLBERT LLC



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Dated: September 29, 2022

CERTIFICATE OF SERVICE

I hereby certify the copies of the foregoing have been mailed, e-mailed or hand delivered to all parties on the official service list for this case on this 29th day of September, 2022.



Brent E. Haden, Mo. Bar No. 54148