

**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            )     File No. EA-2023-0017  
Maintain a High Voltage, Direct Current        )  
Transmission Line and Associated                )  
Converter Station                                    )

**APPLICATION TO INTERVENE**  
**BY THE MISSOURI PORK ASSOCIATION**

COMES NOW the Missouri Pork Association (“MPA”), 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 Pork Association states as follows:

1. The Missouri Pork Association is a nonprofit corporation in good standing organized under the laws of Missouri. MPA was established in 1954 to help all of the state’s producers by providing the pork industry with a unified voice. Its mission is to enhance and optimize opportunities while eliminating or minimizing barriers for the success of Missouri pork producers and other industry stakeholders. MPA established its headquarters in Columbia, Missouri in 1984, and it continues to operate there today.
2. Correspondence, communications, orders and the decision in this matter should be addressed to Missouri Pork Association’s attorney Brent Haden at:

Brent E. Haden  
HADEN & COLBERT LLC  
827 E. Broadway, Suite B  
Columbia, MO 65201  
(573) 442-3535  
(888) 632-7775 (fax)  
brent@showmelaw.com

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 Pork Association has long defended property owners and property rights in cases involving takings of farms or ranches under the eminent domain doctrine. MPA 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 Pork Association and its members, and MPA'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 Pork 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 Pork 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 MPA wishes to become a party to this case for all purposes.

WHEREFORE, the Missouri Pork 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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Brent E. Haden, Mo. Bar No. 54148  
827 E. Broadway, Suite B  
P.O. Box 7166  
Columbia, MO 65201  
(573) 442-3535  
(888) 632-7775 (fax)  
brent@showmelaw.com

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.



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Brent E. Haden, Mo. Bar No. 54148