

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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-2016-0358
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

Objections of the Missouri Landowners Alliance to
Certain Evidence Submitted by Mr. Michael Goggin

The Missouri Landowners Alliance objects to the following pre-filed testimony
and Schedules of Mr. Michael Goggin:

1. The following five Schedules, and related testimony, on the ground that
this material is inadmissible under the terms of Section 536.070(11), as discussed
more fully in paragraph 9 of the Motion of Missouri Landowners Alliance to Strike
Certain Pre-Filed Evidence on the Basis of Section 536.070(11) RSMo, filed on March 6,
2017:

Schedule MG-2, and page 5, lines 90-95; page 7 lines 130-139; and page 9 lines
178-182.

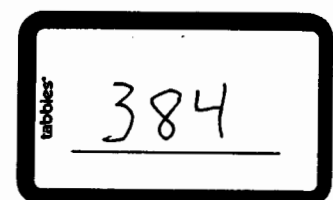
Schedule MG-3, and page 7 lines 143-147; page 24 lines 499-501; and page 25,
lines 510-512.

Schedule MG-4, and page 8, lines 152-157.

Schedule MG-6, and page 22 line 461 to page 23 line 466.

Schedule MG-7, and page 26 lines 538-544.

2. The testimony listed below, on the ground that it addresses or relies on
material cited in footnotes to Mr. Goggin's testimony, which footnotes would themselves



be inadmissible under Section 536.070(11). Thus this testimony should also be deemed inadmissible, as fruit of the poisonous tree, as discussed more fully in paragraph 9 of the Motion of Missouri Landowners Alliance to Strike Certain Pre-Filed Evidence on the Basis of Section 536.070(11) RSMo (Motion) filed on March 6, 2017.

The testimony in question is as follows:

Page 4 lines 67-70, which rely on the material at footnote 4 (See Exhibit E of Motion).

Page 4 lines 76-81, which rely on the material at footnote 5 (See Exhibit F of Motion).

Page 13 lines 278-29, which rely on the material at footnote 13 (See Exhibit G of Motion).

Page 14 lines 289-94, which rely on the materials at footnotes 20-22 (See Exhibit H of Motion).

Page 14 line 295 to page 15 line 297, which rely on the materials at footnote 23 (See Exhibit I of Motion)

Page 20 lines 413-423, which rely on the materials at footnote 33 (See Exhibit J of Motion).

Page 24 lines 498-99, which rely on the material at footnote 47 (See Exhibit G of Motion).

3. Mr. Goggin's rebuttal testimony at page 10 lines 195-98, on the ground that it refers to the Grain Belt Request for Information which was described in Mr. Berry's direct testimony, and which testimony should be stricken on the basis of Grain Belt's refusal to answer data request numbers DB.40 and DB.41 as requested in the MLA's Motion to Compel, filed with the Commission on November 30 2016.

4. Finally, the MLA moves to strike the following portions of Mr. Goggin's rebuttal testimony on the ground that it is inadmissible hearsay: page 4 lines 84-86; page 14, line 295; page 16 lines 330-333; page 16 lines 335-336; page 20 lines 415-423; page

22 lines 451-456; page 23 lines 474-476; page 23 lines 478-479; and page 23 lines 483-485.