

**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. )

**Case No. EA-2023-0017**

**Staff’s Response to Grain Belt Express’  
Motion to Amend Procedural Schedule and  
Staff’s Motion to Amend Procedural Schedule**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to Grain Belt Express’ Motion to Amend Procedural Schedule and Staff’s Motion to Amend Procedural Schedule*, hereby states as follows:

1. On March 24, 2023, Grain Belt Express filed its *Motion to Amend Procedural Schedule*, requesting that the Commission revise the procedural schedule as follows:

Event	Current Schedule	Grain Belt’s Proposed Schedule
Staff Report and Intervenor Rebuttal Testimony	April 5, 2023 (formerly March 28)	April 5, 2023
Data Request (DR) response time shortened to <del>15</del> <b>10</b> calendar days and time to object to DRs shorted to <del>8</del> <b>5</b> calendar days.	March 29, 2023	<b>April 6, 2023</b>
Applicant Surrebuttal & Staff/Intervenor Cross-Surrebuttal Testimony	April 24, 2023	<b>May 1, 2023</b>
Last Day to Issue Discovery Requests	May 2, 2023	<b>May 5, 2023</b>
List of Issues, List of Witnesses, and Order of Cross-Examination	May 9, 2023	<b>May 12, 2023</b>
Last Day to File Motions to Compel Discovery	May 15, 2023	<b>May 16, 2023</b>

Position Statements	May 16, 2023	May 16, 2023
Pre-Filed Exhibit Lists	May 18, 2023	May 18, 2023
Evidentiary Hearing	May 22-26, 2023	May 22-26, 2023
Initial Post-Hearing Briefs	June 14, 2023	June 14, 2023
Reply Briefs	June 21, 2023	June 21, 2023

2. Unfortunately, while Staff is sympathetic to the arguments Grain Belt makes in support of its amendment, Grain Belt's proposed revised procedural schedule WILL NOT WORK FOR STAFF because Staff only just received the MOUs that Grain Belt relies upon to show the need for its now-significantly modified project and Staff's report is due in one week, on April 5. The electrical Staff is in the last week of preparation for the Ameren Rate Case hearing that begins on April 3, 2023, and lasts through April 14, 2023. That case may yet settle, but it has not happened yet and so preparations must go forward unabated. Staff frankly lacks the capacity to analyze the MOUs in one week while simultaneously litigating the Ameren case. Consequently, Staff proposes the following amendments in place of those proposed by Grain Belt:

<b>Event</b>	<b>Current Schedule</b>	<b>Staff's Proposed Schedule</b>
Staff Report and Intervenor Rebuttal Testimony	April 5, 2023 (formerly March 28)	<b>April 19, 2023</b>
Data Request (DR) response time shortened to <del>15</del> <b>10</b> calendar days and time to object to DRs shorted to <del>8</del> <b>5</b> calendar days.	March 29, 2023	<b>April 20, 2023</b>
Applicant Surrebuttal & Staff/Intervenor Cross-Surrebuttal Testimony	April 24, 2023	<b>May 15, 2023</b>
Last Day to Issue Discovery Requests	May 2, 2023	<b>May 15, 2023</b>
List of Issues, List of Witnesses, and Order of Cross-Examination	May 9, 2023	<b>May 26, 2023</b>

Last Day to File Motions to Compel Discovery	May 15, 2023	<b>May 30, 2023</b>
Position Statements	May 16, 2023	<b>June 2, 2023</b>
Pre-Filed Exhibit Lists	May 18, 2023	<b>June 2, 2023</b>
Evidentiary Hearing	May 22-26, 2023	<b>June 5-9, 2023</b>
Initial Post-Hearing Briefs	June 14, 2023	<b>June 30, 2023</b>
Reply Briefs	June 21, 2023	<b>July 7, 2023</b>

3. Staff proposes to push all of the dates out about two weeks, thereby achieving equity for all parties.

**WHEREFORE**, Staff prays that the Commission will DENY Grain Belt Express' *Motion to Amend Procedural Schedule* and will instead adopt Staff's proposed amended procedural schedule as set out herein; and prays for such other and further relief as is just.

Respectfully submitted,

/s/ Kevin A. Thompson

**KEVIN A. THOMPSON**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **29<sup>th</sup> day of March, 2023**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Kevin A. Thompson