

FILED²

APR 3 2017

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. David Berry

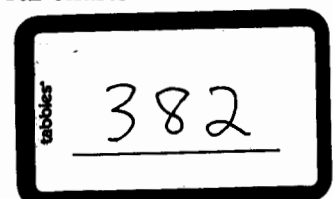
The Missouri Landowners Alliance objects to the following pre-filed testimony
and Schedules submitted by Mr. David Berry:

1. The wind map at Schedule DAB-4 to Mr. Berry's direct testimony, and
discussions of that Schedule at the following pages of Mr. Berry's direct testimony: page
25, line 17; page 25 line 21 to page 26 line 5; page 27 lines 9-12; page 32 lines 7-14; and
page 41 lines 12-13.

The MLA objects to this material on the ground that it is inadmissible under the
terms of Section 536.070(11) RSMo, as discussed more fully in paragraph 4 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.

2. Footnote 1 at page 6 of Mr. Berry's direct testimony, on the ground that it is
inadmissible under the terms of Section 536.070(11) RSMo, as discussed more fully
in paragraph 5 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.

3. Testimony related to Grain Belt's 2014 Request for Information (RFI), at Mr.
Berry's direct testimony, page 24, lines 8-15, , page 26, lines 2-4, and the bar charts



based in part on the responses to the RFI at pages 29-30 of his direct testimony. The basis for this objection is Grain Belt's refusal to fully answer data request numbers DB.40 and DB.41 to Mr. Berry, as requested in the MLA's Motion to Compel answers to those data requests, filed with the Commission on November 30, 2016.