

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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, Mange,)
and Maintain a High Voltage, Direct Current)
Transmission Line and an Associated)
Converter Station Providing an)
Interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

Case No. EA-2023-0017

**JOINT LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF
CROSS-EXAMINATION, AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and on behalf of all parties, tenders the following *List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements*¹:

I. LIST OF ISSUES

1. Does the evidence establish that the following amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are “necessary or convenient for the public service” within the meaning of that phrase under section 393.170, RSMo:

- a. Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW.

¹ Order of witnesses and order of cross-examination may be modified at the hearing with the approval of the judge due to witness availability or to reflect actual adverseness.

- b. Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.
- c. Constructing the Project in two phases.
 - i. If the Commission determines that constructing the project in two phases is “necessary or convenient for the public service,” should the Commission approve a modification to the “Financing Conditions,” as set forth in Section I of Exhibit 1 to the Report & Order on Remand in Case No. EA-2016-0358, to allow for constructing the Project in two phases?

2. Should the Commission approve a modification of the Landowner Protocols, as referenced and incorporated into the Report & Order on Remand in Case No. EA-2016-0358, to modify the compensation package offered to Tiger Connector landowners?

3. Should the Commission approve a modification of Ordering Paragraph 5 in the Report & Order on Remand in Case No. EA-2016-0358, such that easements obtained by means of eminent domain must be returned to the fee simple title holder if Grain Belt Express LLC does not satisfy the Financing Conditions within seven years, rather than five years, from the date that such easement rights are recorded with the appropriate county recorder of deeds?

4. If the Commission approves any or all of the foregoing amendments, what conditions, if any, should the Commission impose?

II. ORDER OF WITNESSES AND CROSS EXAMINATION

1. Grain Belt Express

Shashank Sane
Mark Repsher
Rolanda Shine
Carlos Rodriguez
Aaron White
Rob Baker (adopting Anthony Petti's testimony)
Jonathan Monken
Jen Stelzleni
Andrew Burke
Kevin Chandler
Dr. David Loomis (Only available June 7)

Order of cross-examination: Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission ("MEC"), Sierra Club, Renew Missouri Advocates ("Renew MO"), Clean Grid Alliance ("CGA"), Office of Public Counsel ("OPC") (if present), Union Electric Company d/b/a Ameren Missouri ("Ameren"), Staff, Missouri Landowners Association ("MLA")², Agricultural Associations ("Ag. Assoc.")³, William W. & Amy Jo Hollander ("Hollander"), David & Patricia Stemme ("Stemme"), Associated Industries of Missouri ("AIM").

2. Staff

Michael Stahlman
Seoung Joun Won
Shawn Lange
Krishna Poudel
Alan Bax
Cedric Cunnigan
Jordan Hull
Michael Rush
Claire Eubanks

² Paul Agathen represents MLA, Eastern Missouri Landowners Alliance d/b/a Show Me Concerned Landowners, Dustin Hudson, Norman Fishel and Gary & Carol Riedel. As those parties' interests are aligned, Mr. Agathen will have one opportunity to cross-examine each witness on behalf of all his clients.

³ The Agricultural Associations include Missouri Farm Bureau Federation, Missouri Cattlemen's Association, Missouri Pork Association, Missouri Corn Growers Association, Missouri Soybean Association. The Agricultural Associations are represented by Brent Haden. As those parties' interests are aligned, Mr. Haden will have one opportunity to cross-examine each witness on behalf of all his clients.

Order of cross-examination: MLA, Ag. Assoc., Hollander, Stemme, OPC (if present), AIM, Sierra Club, Renew MO, CGA, MEC, Ameren, Grain Belt

3. **Clean Grid Alliance**

Michael Goggin⁴

Order of cross-examination: MEC, AIM, Sierra Club, Renew MO, Grain Belt, OPC (if present), Staff, Ameren, MLA, Ag. Assoc., Hollander, Stemme

4. **Ag. Associations/Missouri Farm Bureau**

Garett Hawkins

Order of cross-examination: MLA, Hollander, Stemme, OPC (if present), Staff, AIM, Sierra Club, Renew MO, CGA, MEC, Ameren, Grain Belt

5. **Sierra Club**

Michael Mulligan⁵

Order of cross-examination: MEC, AIM, Renew MO, CGA, Grain Belt, OPC (if present), Staff, Ameren, MLA, Ag. Assoc., Hollander, Stemme

6. **Landowner Patricia Stemme**

Patricia Stemme

Order of cross-examination: MLA, Ag. Assoc., Hollander, OPC (if present), Staff, AIM, Sierra Club, Renew MO, CGA, MEC, Ameren, Grain Belt

7. **MEC**

John Twitty
Rebecca Atkins
John Grotzinger

⁴ Clean Grid Alliance witness Michael Goggin is available for in-person testimony on June 9, and is available to testify remotely on June 5 – 8.

⁵ Sierra Club witness Michael Mulligan intends to testify remotely.

Order of cross-examination: AIM, Sierra Club, Renew MO, CGA, Grain Belt, OPC (if present), Staff, Ameren, MLA, Ag. Assoc., Hollander, Stemme

8. **Renew Missouri**

James Owen

Order of cross-examination: MEC, AIM, Sierra Club, CGA, Grain Belt, OPC (if present), Staff, Ameren, MLA, Ag. Assoc., Hollander, Stemme

III. ORDER OF OPENING STATEMENTS

1. Grain Belt Express LLC⁶
2. MEC/MJMEUC
3. Sierra Club
4. Renew Missouri
5. Clean Grid Alliance
6. OPC (if present)
7. Ameren
8. Staff
9. MLA
10. Ag. Associations/Missouri Farm Bureau
11. William and Amy Jo Hollander
12. Patricia Stemme
13. Associated Industries of Missouri

⁶ Grain Belt Express, as the party with the burden of proof, retains the right to reserve a portion of its opening statement for rebuttal after all parties have been provided an opportunity to give an opening statement.

WHEREFORE, the undersigned counsel submits this *Joint List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements*.

Respectfully submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to all counsel and parties of record on this 22nd day of May, 2023.

/s/ Travis J. Pringle