

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

Missouri Landowners Alliance, et al.,	)	
	)	
Complainants,	)	
	)	
v.	)	<b><u>Case No. EC-2020-0408</u></b>
	)	
Grain Belt Express Clean Line LLC, et al.,	)	
	)	
Respondents.	)	

**JOINT LIST OF ISSUES, LIST OF DIRECT EXAMINATION EXHIBITS,  
ORDER OF WITNESSES, ORDER OF PARTIES FOR CROSS-EXAMINATION,  
AND ORDER OF OPENING STATEMENTS**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, on behalf of itself, the Missouri Landowners Alliance and Gary Mareschal (“Complainants”), and Grain Belt Express Clean Line LLC, Invenergy Transmission LLC, and Invenergy Investment Company (“Respondents”), and hereby files the following *Joint List of Issues, List of Direct Examination Exhibits, Order of Witnesses, Order of Parties for Cross-Examination, and Order of Opening Statements*:

**I. LIST OF ISSUES**

1. Did land agents, working on behalf of Respondents, falsely claim that Grain Belt was no longer involved with the transmission line project, approved by the Commission in Case No. EA-2016-0358, during negotiations with landowners?
2. To the extent the answer to the Issue above is yes, did Respondents violate any law or any Commission rule, order or decision?

3. To the extent the answers to Issues 1 and 2 are yes, what remedy, if any, should be adopted by the Commission?

## **II. LIST OF DIRECT EXAMINATION EXHIBITS<sup>1</sup>**

### **1. Complainants**

Complainants' Response to Staff Data Request 0004  
Complainants' Response to Staff Data Request 0005  
Affidavit of Gary Mareschal, dated June 27, 2020  
Affidavit of Marvin J. Daniels, dated July 1, 2020

### **Respondents**

- a. CLS Form Letter to Landowners, dated May 29, 2020 (filed under EFIS Item No. 3)
- b. Invenergy Fact Sheet (filed under EFIS Item No. 3)
- c. Sample Parcel Map Example (filed under EFIS Item No. 3)
- d. Landowner FAQs (filed under EFIS Item No. 3)
- e. Grain Belt Notice of Compliance (filed under EFIS Item No. 3)
- f. Walters Affidavit (filed under EFIS Item No. 9)
- g. Brown Affidavit (filed under EFIS Item No. 9)
- h. Script Example – June 2020 (filed under EFIS Item No. 9)
- i. June 1, 2020 Email from Adam White (filed under EFIS Item No. 9)
- j. Training Agenda for June 2-4, 2020 (filed under EFIS Item No. 9)
- k. Slide Deck used for June 2-4, 2020 Training (filed under EFIS Item No. 9)
- l. Slide Deck used for June 25, 2020 Training (filed under EFIS Item No. 9)
- m. Respondents Objections & Responses to MLA DR Nos. 1-12
- n. Walters 6-9-2020 Call Log (produced as an attachment in response to MLS DR No. 5)
- o. Walters 6-17-2020 Call Log (produced as an attachment in response to MLS DR No. 5)
- p. Brown 4-1-20 Call Log (produced as an attachment in response to MLS DR No. 6)
- q. March 30, 2020 Email from Adam White (produced as an attachment in response to MLS DR No. 6)
- r. Survey Access Form (attachment to March 30, 2020 Email from Adam White)

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<sup>1</sup> For exhibits not yet filed in EFIS, the parties intend to exchange said exhibits and file a Notice of Exhibit Disclosure no later than January 12, 2021.

- s. Script Example – March 2020 (attachment to March 30, 2020 Email from Adam White)
- t. Bat Survey Fact Sheet (attachment to March 30, 2020 Email from Adam White)
- u. Respondents Supplemental Response to Staff DR No. 2
- v. Walters 7-13-20 Call and Email Log (produced as an attachment in response to Staff DR No. 2)
- w. Respondents Response to Staff DR No. 6 (CONFIDENTIAL)
- x. Grain Belt Logo (produced as an attachment in response to Staff DR No. 6)

- 2. Staff  
Staff Report

### **III. ORDER OF WITNESSES AND CROSS EXAMINATION**

- 1. Complainants  
Gary Mareschal  
Marvin J (Jim) Daniels  
Order of Cross-examination: Staff, Respondents
- 2. Respondents  
Adam White  
Alex Brown  
Daniel Walters  
Order of cross-examination: Staff, Complainants
- 3. Staff  
Shawn Lange  
Order of cross-examination: Respondents, Complainants

### **IV. ORDER OF OPENING STATEMENTS**

- 1. Complainants
- 2. Respondents
- 3. Staff

**WHEREFORE**, the undersigned counsel submits this *Joint List of Issues, List of Direct Examination Exhibits, Order of Witnesses, Order of Parties for 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 7th day of January, 2021.

**/s/ Travis J. Pringle**