

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

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

STAFF’S STATEMENT OF POSITION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and for its *Statement of Position* respectfully states:

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?

Affidavits provided by Complainants allege false claims were made, and affidavits from Respondents deny such false claims were made. However, without a phone recording of the conversations, Staff is unable to ascertain exactly what was said, and in what context of the conversation.

2. To the extent the answer to the Issue above is yes, did Respondents violate any law or any Commission rule, order or decision?

Staff is unable to ascertain exactly what was said between land agents and landowners, and thus cannot conclude that Respondents violated any law or 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?

Staff cannot answer yes to Issues 1 and 2. However, Staff noted in its report that Respondents have provided documentation of additional training requiring its land agents to comply with the Code of Conduct, and that Respondent training materials included a true statement that Invenergy is the owner of the Grain Belt project. Staff recommends the Commission direct Respondents to periodically continue such training to current land agents and ensure new land agents receive all available training. Staff recommends this training focus on protocols including, but not limited to, the Missouri Landowner Protocol, which includes the Code of Conduct for Missouri, and the Missouri Agricultural Impact Mitigation Protocols.

WHEREFORE, Staff hereby tenders its *Statement of Position* for the Commission's information and consideration.

Respectfully Submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to the Complainant and/or all counsels of record this 8th day of January, 2021.

/s/ Travis J. Pringle