

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

In the Matter of the Joint Application of Invenergy)
Transmission LLC, Invenergy Investment Company LLC,)
Grain Belt Express Clean Line LLC, and Grain Belt Express) Case No. EM-2019-0150
Holding LLC for an Order Approving the Acquisition by)
Invenergy Transmission LLC of Grain Belt Express Clean Line)
LLC)

**GRAIN BELT EXPRESS CLEAN LINE LLC'S OBJECTIONS AND RESPONSES TO
JOSEPH AND ROSE KRONER'S FIRST REQUESTS FOR ADMISSION**

For its objections and responses to Joseph and Rose Kroner's First Requests for Admission, Nos. 1-11, Grain Belt Express Clean Line LLC ("Grain Belt Express" or "Company") states the following:

1. Except for the addition of "[Confidential]" on the cover page, the document attached hereto as Schedule 1 (Confidential) is an accurate copy of a portion of the in-camera cross-examination of Mr. Kris Zadlo, consisting of the cover page, page 2050, and pages 2056-2059 of transcript volume 23 in Commission Case No. EA-2016-0358.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

2. The document attached hereto as Schedule 2 is an accurate copy of another portion of the cross-examination of Mr. Kris Zadlo, consisting of the cover page, page 2017 and pages 2036-2041 of transcript volume 22 in Commission Case No. EA-2016-0358.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

3. The document attached hereto as Schedule 3 is an accurate copy of the following portions of the Reply Brief of Applicant Grain Belt Express Clean Line LLC, filed on April 24, 2017 in Commission Case No. EA-2016-0358: the cover page, pages 42-43, and pages 49-50.

Exhibit No. 16
Date 4-23-19 Reporter TW
File No. EM-2019-0150

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

4. Except for the addition of “[Confidential]” on the cover page, the document attached hereto as Schedule 4 (Confidential) is an accurate copy of a portion of the cross-examination of Grain Belt witness Mr. David Berry, consisting of the cover page, page 813, and pages 852-857 of transcript volume 14 in Commission Case No. EA-2016-0358 (EFIS 425).

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

5. The document attached hereto as Schedule 5 is an accurate copy of page 1 and page 5 of the “First Amended Answer and Affirmative Defenses of Grain Belt Express Clean Line LLC” filed in response to the Petition of the Missouri Landowners Alliance et al. in Case No. 14CL-CV00222 on January 16, 2015 in the Circuit Court of Caldwell County.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

6. Except for the addition of the term “Doc 908” at page 1, the document attached hereto as Schedule 6 is an accurate copy of page 1 and page 5 of the “First Amended Answer and Affirmative Defenses of Grain Belt Express Clean Line LLC” filed in response to the Petition of the Missouri Landowners Alliance et al. in Case No. 14MN-CV00164 on January 16, 2015 in the Circuit Court of Monroe County.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

7. The document attached hereto as Schedule 7 is an accurate copy of pages 1, 7 and 8 of the “Reply Brief of Appellant Grain Belt Express Clean Line”, filed with the Eastern District

of the Missouri Court of Appeals in Case No. ED105932 on or about January 11, 2018, and the acronym "MLA" as used therein stands for the Missouri Landowners Alliance.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

8. The document attached hereto as Schedule 8 is an accurate copy of the cover page and page i of the "Substitute Brief of Intervener Missouri Landowners Alliance in Support of Respondent PSC and in Response to Substitute Brief of Appellant Grain Belt Express Clean Line, LLC", filed in Supreme Court Case No. SC96993, which case was heard on transfer from the Eastern District of the Missouri Court of Appeals Case No. ED105932.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, the Company states as it did not prepare or file the Substitute Brief referred to above, it is unable to admit that Schedule 8 is an accurate copy of the pages contained there.

9. The document attached hereto as Schedule 9 is an accurate copy of the cover page and pages 18, 20 and 46-52 of the Initial Post-Hearing Brief of Grain Belt Express in Case No. EA-2016-0358.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

10. The document attached hereto as Schedule 10 is an accurate copy of the testimony of Mr. Prescott Hartshorne, filed on behalf of Grain Belt Express in Commission case EA2016-0358.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

11. The document attached hereto as Schedule 11 is an accurate copy of the cover page and pages 8, 9, 13 and 14 of the direct testimony of Mr. Michael Skelly in Commission case EA-2014-0207.

RESPONSE: Objection. This Request seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Subject to all objections, admitted.

Dentons US LLP

/s/ Karl Zobrist

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ATTORNEYS FOR GRAIN BELT EXPRESS
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 8th day of April 2019.

/s/ Karl Zobrist

Attorney For Grain Belt Express Clean Line LLC