From:
Sent:
To:
Subject:

Seth Wright

FW: PSC Complaint

From: paa0408@aol.com <paa0408@aol.com>

Sent: Friday, August 13, 2021 6:51 PM **To:** Seth Wright <SCWright@Polsinelli.com>

Subject: Re: PSC Complaint

EXTERNAL EMAIL paa0408@aol.com

For the week of August 16, I would be available any time except: Monday, 10:30 am - 12:30 pm; and Tuesday, after 1:30 pm. Let me know what works for you.

Paul

In a message dated 8/13/2021 5:33:33 PM Central Standard Time, SCWright@Polsinelli.com writes:

Paul,

Grain Belt requests a call to understand and respond to your client's concerns before you initiate a formal complaint. Additionally, we would like to know on whose behalf you are requesting information about ROW acquisitions and environmental studies. Please let us know of convenient times next week for a phone call.

Seth C. Wright

Shareholder

scwright@polsinelli.com

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Polsinelli PC, Polsinelli LLP in California

polsinelli.com

Sent: Friday, August 13, 2021 3:56 PM To: Seth Wright < SCWright@Polsinelli.com > Subject: PSC Complaint
EXTERNAL EMAIL paa0408@aol.com
Seth, FYI, unless you change your position, we will likely be filing a complaint with the PSC for what I consider a failure to directly answer the three questions I raised in my letter to you of July 29.
If we do file, I may be adding a second count alleging that Grain Belt may not refuse to pay for the structure payments and the additional 10% of fee value for easements if the question goes to court in a condemnation proceeding. This position would be based on the Missouri Landowner Protocol, which requires that those payments be made.
Also, I have three questions for you. At this point, how many voluntary easements has Grain Belt acquired for the Missouri right-of-way; how many such easements will Grain Belt need in total for the Missouri portion of the line; and has Grain Belt conducted any wildlife/environmental studies in Caldwell County. If they have, kindly send me a copy of any such studies they have conducted.
Thank you.
Paul
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From: paa0408@aol.com <paa0408@aol.com>