

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, and)
Eastern Missouri Landowners Alliance)
DBA Show Me Concerned Landowners, and)
John G. Hobbs,)
Complainants,) Case No. EC-2021-0059
V.)
Grain Belt Express LLC, and)
Invenergy Transmission LLC)
Respondents.)

SUBMITTAL OF RESPONDENTS' EXHIBIT NO. 200

Pursuant to the directive of Judge John Clark at the evidentiary hearing held on April 15, 2021, Invenergy Transmission LLC and Grain Belt Express LLC (together, "Respondents") hereby submit their Exhibit No. 200 into the record of this proceeding.

Respectfully submitted,

/s/ Andrew O. Schulte

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ATTORNEYS FOR GRAIN BELT EXPRESS LLC AND
INVENERGY TRANSMISSION LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing objections and responses was served upon all parties of record by electronic mail this 16th day of April, 2021.

/s/ Andrew O. Schulte
Attorney for Respondents

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Grain Belt Express LLC, and)	
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)	
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RESPONDENTS’ SUPPLEMENTAL RESPONSE TO
DATA REQUEST NO. 8

Pursuant to 20 CSR 4240-2.090, Grain Belt Express LLC and Invenergy Transmission LLC (collectively, “Respondents”), provide this supplemental response to Data Request No. 8 from Complainants by reproducing the request and providing Respondents’ supplemental response below.

SUPPLEMENTAL RESPONSE

Data Request:

8. *Do Respondents presently plan to eventually seek regulatory approval from the Missouri Commission for the changes described in the press release attached as Exhibit 1 to the Complaint in this case, assuming no other significant changes are proposed to the project as originally approved?*

Initial Response:

Yes.

Supplemental Response:

In light of Complainants’ miscomprehension or mischaracterization of Respondents’ initial response of “Yes” to the foregoing data request,¹ Respondents’ hereby affirm that the initial response was correct, but provide further context for the benefit of the parties and the Commission. The

¹ Complainants’ Position Statement, EFIS Item No. 45, p. 3 (March 29, 2021).

affirmative response incorporates the fact that the “changes described in the press release” are contemplated changes, and Respondents “presently plan to eventually seek regulatory approval” if, at some point in the future, the contemplated changes become reasonably certain. Stated another way, Respondents are presently planning for multiple uncertain futures, and plan to abide by the conditions of the CCN under all scenarios.

VERIFICATION OF RESPONSE

The response provided to the foregoing Data Request has been collected from various sources at Invenegy Transmission LLC and Grain Belt Express LLC, and is true and accurate to the best of my knowledge and belief.

Signed: /s/ Kris Zadlo
Kris Zadlo
Senior Vice President
Invenegy LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing objections and responses was served upon all parties of record by electronic mail this 1st day of April, 2021.

/s/ Andrew O. Schulte
Attorney for Respondents