

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

In the Matter of the Application of)
Grain Belt Express Clean Line LLC for a)
Certificate of Convenience and Necessity)
Authorizing It to Construct, Own, Operate,)
Control, Manage, and Maintain a High)
Voltage, Direct Current Transmission Line)
and an Associated Converter Station)
Providing an Interconnection on the)
Maywood - Montgomery 345 kV transmission)
Line.)

Case No. EA-2016-0358

**RESPONSE OF SHOW ME CONCERNED LANDOWNERS
TO OBJECTIONS OF GRAIN BELT EXPRESS**

COMES NOW the Eastern Missouri Landowners Alliance d/b/a Show Me Concerned Landowners ("Show Me") and respectfully responds to the *Objections of Grain Belt Express to Exhibits Offered at Local Public Hearing* ("Objections"). In support of this response, Show Me states as follows:

1. On December 7, 8, 13, and 14, 2016, the Missouri Public Service Commission ("Commission") conducted eight local public hearings, two on each date. The purpose of the local public hearings was to receive public comment regarding the proposed project in this case.
2. During the local public hearings, the Commission invited individuals to submit exhibits to supplement and expand their oral testimony, partially in response to the its imposition of a five-minute limit on public testimony.
3. On December 27, 2016, the applicant Grain Belt Express ("GBX") filed its *Objections* to several exhibits submitted by landowners appearing to testify at the local public hearings. In the aggregate, the objections pertain to photographs of landscapes of the area, including photographs of existing transmission lines, articles, and documents discussing

economic and health impacts of the proposed project. GBX's *Objections*, in the aggregate, include arguments that the exhibits are irrelevant, are prohibited hearsay, and lack an adequate foundation.

4. The purpose for the local public hearings was to receive the opinions and impressions of the public regarding the proposed project. In each instance of the submitted exhibits, the witness proffered the exhibit as a representation of the witness' justification for his or her opinion. Whether the picture represented the landscape of the witness' farm or a typical visual impact of an existing transmission line on a landscape or whether an article or document presented a rationale for a concern the witness had, each exhibit fulfilled the purpose of the local public hearing. The exhibit constituted the justification for the landowner's concern and is relevant to this proceeding. And with each exhibit, there was a foundation in that the witness presented the exhibit as a representation of his or her opinion. Finally, each exhibit was an expression of the justification for his or her own opinion and, therefore, not hearsay.

5. The purpose of a local public hearing is different from the purpose of an evidentiary hearing, as the Commission is aware. As has already been stated, the local public hearing is designed for the Commission to receive the opinions of the public. The evidentiary hearing is designed to build a factual record on which the Commission will base its decision. The Commission is able to make these distinctions and can evaluate the weight of the exhibits accordingly.

6. The landowners are trying to protect their land. They have serious concerns with the impact of the proposed project on their land and lives. As the exhibits to which GBX objects were tendered by the witnesses themselves as the basis for their own opinions and cause, GBX objections of lack of foundation, of hearsay, and of relevance are wrong.

Wherefore, Show Me requests that the Commission overrule each of GBX objections.

Respectfully submitted,

By: /s/ David C. Linton

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EA-2016-0358 via electronic transmission this 31st day of December, 2016.

/s/ David C. Linton