

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Cheri Meadows,)
)
Complainant,) Case No. EC-2025-0136
)
v.)
)
)
Grain Belt Express LLC,)
)
Respondent)

**GRAIN BELT EXPRESS LLC’S REPLY TO CHERI MEADOWS’ REBUTTAL TO
RESPONSE TO FORMAL COMPLAINT**

Grain Belt Express LLC (“Grain Belt Express” or “Respondent”), pursuant to 20 CSR 4240-2.070(8), hereby files this Reply to the November 26, 2024 Rebuttal to Grain Belt Express’ Response to Ms. Meadows’ Complaint. In support of its Reply, Respondent states the following:

I. Background

1. On October 15, 2024, Cheri Meadows (“Ms. Meadows” or “Complainant”) filed a formal complaint against Grain Belt Express (“Complaint”), expressing her opposition to the route of Grain Belt Express’ AC transmission line, the Tiger Connector,¹ across her property located in Callaway County, Missouri.

2. On November 15, 2024, Grain Belt Express filed its Response to Ms. Meadows’ Complaint, and on November 26, 2024, Ms. Meadows filed her Rebuttal to Grain Belt Express’ Response. Grain Belt Express incorporates by reference its earlier Response and files this Reply to correct certain misstatements and errors in Ms. Meadows’ Rebuttal and respond to certain

¹ The Tiger Connector is described more fully, *infra*.

allegations. To the extent that Grain Belt Express does not address other claims previously addressed in other pleadings. Grain Belt Express reserves the right to respond more fully should the issue continue to arise. Grain Belt Express does not address Ms. Meadows' personal opinions or Ms. Meadows' hypothetical questions in this Reply.

3. Grain Belt Express is a public utility as defined by Section 386.020(43) RSMo.² Grain Belt Express is an electrical corporation and public utility regulated by the Commission.³ In the Commission's *Report and Order on Remand* (the "Original CCN Order") in File No. EA-2016-0358, Grain Belt Express was granted authority to construct, own, operate, control, manage and maintain HVDC electric transmission facilities (the "Grain Belt Express Project" or the "Project") within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls Counties, Missouri, as well as an associated converter station in Ralls County, pursuant to Section 393.170.1 RSMo.

4. In the Commission's October 12, 2023 *Report and Order* ("New CCN Order") in File No. EA-2023-0017, Grain Belt Express' Original CCN was modified to (1) relocate the Missouri converter station of the Project from Ralls County to Monroe County and to increase the capacity of the Missouri converter station from 500 MW to 2,500 MW in order to deliver 2,500 MW into Missouri, including 1,500 MW into MISO and an additional 1,000 into AECI; (2) relocate the AC connector line (the "Tiger Connector") from Ralls County to Monroe, Audrain, and Callaway Counties; and (3) allow for construction of the Project in two phases. The New CCN Order found that the Project, which includes the Tiger Connector and its route (which includes a portion of Ms. Meadows' property), is in the public interest of the State of Missouri. The New

² File No. EA-2016-0358, Report and Order on Remand.

³ File No. EA-2016-0358, Report and Order on Remand, pages 37 and 38.

CCN Order approved the routing process and the proposed route for the Tiger Connector.⁴ The New CCN Order also considered and approved of Grain Belt Express' efforts to avoid, minimize and mitigate landowner and agricultural impacts.⁵

II. Grain Belt Fully Complied with Legal Notice Requirements

5. Pursuant to 20 CSR 4240-20.045(K), a public utility such as Grain Belt Express is required to provide notice in writing to all landowners that may be directly affected by the proposed route of an electric transmission line. That regulation states that land is "directly affected" if a permanent easement or other permanent property interest would be obtained over all or any portion of the land, or if the land contains a habitable structure that would be within 300 feet of the centerline of an electric transmission line.

6. In the New CCN proceeding, Grain Belt Express provided two separate notices to landowners in accordance with 20 CSR 4240-20.045(K): (1) the July 12, 2022 letter to provide notice of the public meetings to be held in Audrain and Callaway Counties, Missouri (provided to all landowners within 1,000 feet of the centerline);⁶ and (2) the August 18, 2022 letter to landowners (provided to landowners either directly affected or within 300 feet of the centerline) notifying them of the Final Proposed Route of the Tiger Connector and Grain Belt Express' intent to file its application in MPSC Docket No. EA-2023-0017.⁷

7. Ms. Meadows' Rebuttal refers to page 14 of Grain Belt Express' Response, wherein Grain Belt Express noted that "...moving the path of the Tiger Connector 600 feet south would

⁴ New CCN Order, p. 42 (Findings of Fact Nos. 138-140)

⁵ New CCN Order, pp. 40-43 (Findings of Fact Nos. 134-137, 141-143).

⁶ Docket No. EA-2023-0017, Schedule KC-2 at pp. 14-15, affixed to the Direct Testimony of Kevin Chandler (Exhibit 19).

⁷ Docket No. EA-2023-0017, Schedule KC-3 at pp. 4-5, affixed to the Direct Testimony of Kevin Chandler (Exhibit 19).

impact the northeast corner of a parcel owned by a new landowner with whom Grain Belt Express has had no contact, given that such landowner's property is not impacted by Tiger Connector."

8. Ms. Meadows then refers to the Tiger Connector Transmission Line Route Selection Study Schedule AB-2, which states that "landowner notification letters were mailed directly to landowners within 1,000 feet of the centerline of any Potential Routes." Ms. Meadows also refers to Grain Belt Express witness Kevin Chandler's testimony in the New CCN proceeding wherein Mr. Chandler notes that "after Potential Routes for the Tiger Connector were developed, our team created notification boundaries to identify potentially affected parcels and landowners. This boundary was established at 1,000 feet from all potential centerlines of the Potential Routes running through Callaway, Audrain, and Monroe Counties."

9. Ms. Meadows' Rebuttal claims that Grain Belt Express' statement that "it has had no contact with the landowner to the south of her property" is contradictory to its testimony regarding notifying landowners within 1,000 feet of the centerline. Ms. Meadows' claim lacks context.

10. The landowner who owns the property to the south of Ms. Meadows received the July 12, 2022 letter notifying them of the public meetings. The landowner was not sent the August 18, 2022 letter to landowners directly affected by the Final Proposed Route or within 300 feet of the centerline because they were not directly affected by the Final Proposed Route or within 300 feet of the centerline. This parcel was not selected for the Final Proposed Route due to residential and agricultural constraints and was not considered further.⁸ Apart from the required notice letter

⁸ See aerial map representing routing constraints on Ms. Meadows and neighboring parcels, affixed to Grain Belt Express' response to MPSC Staff Data Request 0003 as Attachment A, attached hereto as Exhibit A.

mailed on July 2022 for this parcel, Grain Belt Express has had no substantive contact with the landowner regarding this parcel.

11. Accordingly, Grain Belt Express fully complied with the landowner notice requirements contained in 20 CSR 4240-20.045(K) and Ms. Meadows' assertions to the contrary should be disregarded.

III. Grain Belt Express Commits to Following Landowner Preferences for Herbicide and Fertilizer Application, As Outlined in Its Agricultural Impact Mitigation Protocol

12. Ms. Meadows mentions numerous times throughout her Complaint and Rebuttal that she is opposed to the use of “toxic chemicals” for vegetation management on her property, given her fear that they will have a negative impact on her health or the health or well-being of her animals.

13. As the Commission is aware, Grain Belt Express is required to comply with certain conditions and protocols, including the Missouri Agricultural Impact Mitigation Protocol.⁹ Section 18 of the Missouri Agricultural Impact Mitigation Protocol provides additional protections for landowners engaged in organic farm production methods to ensure that the landowner sustains no loss of organic farm certifications or accreditations. The Protocol notes that “when preferred by the landowner, the Company will avoid use of treated wood for construction matting and avoid herbicide and fertilizer application.”¹⁰ Such options are available to all landowners signing voluntary easement agreements, and if Ms. Meadows is concerned about the use of chemicals for vegetation management, Grain Belt Express would be amenable to utilizing only organic vegetation management methods and herbicides on her property within the context of a voluntary agreement.

⁹ File No. EA-2016-0358, Report and Order on Remand, Attachment 5.

¹⁰ *Id.* at 10.

IV. Grain Belt Express Has Engaged in Micro-Siting Efforts with Ms. Meadows

14. The New CCN Order and the Agricultural Impact Mitigation Protocols require Grain Belt to engage with individual landowners to review landowner-requested micro-siting changes on their property.¹¹ As the Commission made clear, minor deviations to the location of the line not exceeding 500 feet are permitted due to surveying, final engineering and design, and landowner consultation, so long as the line and required easements stay within the property boundaries of that landowner and do not involve a new landowner.¹²

15. Ms. Meadows asserts in her Rebuttal that Grain Belt Express' statement that it has engaged in micro-siting efforts with her is "absolutely false."

16. As noted in its Response to Ms. Meadows' Complaint, Grain Belt Express and staff from Contract Land Services (the firm supporting land acquisition efforts on the Tiger Connector route) met with Ms. Meadows at her home on March 28, 2024. During the visit, Ms. Meadows expressed her opposition to the Tiger Connector and requested that the route be relocated entirely off her property.

17. The Grain Belt Express representatives informed her that while route adjustments can be made based on landowner requests, relocating the route entirely off her property is not feasible. Grain Belt Express explained that the stipulations outlined in the New CCN Order issued by the Commission prohibit Grain Belt Express from shifting the route in a manner that would move it onto new properties not previously affected by the route. In an effort to address Ms. Meadows' concerns, Grain Belt Express engaged in micro-siting and proposed moving the route as far from her residence as possible without introducing new landowners.

¹¹ New CCN Order, p. 62; Agricultural Impact Mitigation Protocols, Section 4.

¹² Case No. EA-2023-0017, Report and Order, Attachment 1, Section VII (Oct. 12, 2023) (Emphasis supplied.).

18. Subsequent to the March 28, 2024 meeting, Ms. Meadows' request was reviewed by Grain Belt Express' engineering team, who successfully adjusted the route 94 feet south.

19. What occurred during the site visit to Ms. Meadows' home and subsequent engineering efforts was and remains the process of micro-siting—minor deviations to the route as a result of engineering, surveying, or landowner consultation or requests. Ms. Meadows' statement that Grain Belt Express did not engage in micro-siting should be disregarded.

V. Ms. Meadows Had Ample Notice and Opportunity to Participate in the New CCN Order Proceedings

20. The essence of Ms. Meadows' formal Complaint is that Ms. Meadows would like the Commission-approved route for the Tiger Connector moved south of her property.¹³ These concerns could have been and should have been raised during the New CCN Order proceeding in June 2023.

21. As noted in Grain Belt Express' Response to the Complaint, in support of its Application in File No. EA-2023-0017, Grain Belt Express formed a multi-disciplinary Routing Team consisting of personnel from Invenergy, its routing consultant, WSP, and its public involvement consultant, HDR, Inc. ("HDR"). The Routing Team conducted a comprehensive Route Selection Study to establish a proposed route for the Tiger Connector. Grain Belt Express witness Andrew Burke from WSP has extensive experience siting transmission lines throughout the country, and Mr. Burke sponsored the Routing Study for the Tiger Connector.

22. As discussed in the Routing Study,¹⁴ the process of selecting a route for the Tiger Connector was a detailed exercise that evaluates numerous potential routes utilizing established criteria. The Route Selection Study was intended to identify transmission line routes that minimize

¹³ Complaint at p. 2.

¹⁴ Direct Testimony of Andrew Burke, Exhibit 17 in File No. EA-2023-0017, Schedule AB-2.

effects on land use, ecological, and cultural features, while considering economic and technical feasibility.

23. Grain Belt Express' Route Selection Study and its Final Proposed Route were evaluated by the Commission and its Staff and endorsed and approved in the New CCN Order. The Final Proposed Route was selected after extensive public outreach, and potential routes were available to the public at public meetings in July 2022. Grain Belt Express filed its application in the New CCN proceeding on August 22, 2022, and all impacted landowners received written notice of the intent to file the Application through the August 18, 2022 landowner notice letter. The August 18, 2022 landowner notice letter included the MPSC case number in which the Application would be filed, as well as phone numbers for the MPSC and the Office of the Public Counsel.¹⁵ The August 18, 2022 landowner notice letter also provided a phone number and email address for the Grain Belt Express project team and a website where landowners could obtain additional information.¹⁶

24. As the Commission will recall, numerous landowners impacted by the Final Proposed Route for the Tiger Connector sought and were granted intervention in the New CCN proceedings: Norman Fishel, David and Patricia Stemme, Gary and Carol Riedel, Dustin Hudson, and William and Amy Jo Hollander. In addition to individual landowners, two well-known landowner groups sought and were granted intervention: the Eastern Missouri Landowners Alliance, *d/b/a* Show Me Concerned Landowners, and the Missouri Landowners Alliance.

25. Ms. Meadows had the same right and opportunity to intervene in the New CCN proceeding as every other landowner, yet she did not. Had Ms. Meadows elected to intervene in

¹⁵ Docket No. EA-2023-0017, Schedule KC-3, affixed to the Direct Testimony of Kevin Chandler (Exhibit 19).

¹⁶ *Id.* at 4-5.

the New CCN proceeding or chosen to participate through one of the two landowner groups, the Commission could have heard and considered her concerns regarding the route crossing her property before the route was approved. Yet, Ms. Meadows chose to file a complaint regarding the route over a year after the route was approved.

26. Missouri law provides specific protections for landowners that are directly affected by the route of an electric transmission line. In the present case, Ms. Meadows was notified by direct letter in July 2022 of the public meetings hosted by Grain Belt Express to discuss potential routes for the Tiger Connector. Ms. Meadows participated in those public meetings. Ms. Meadows was also notified by direct letter in August 2022 of Grain Belt Express' intent to file its application containing the Final Proposed Route of the Tiger Connector and was provided with the MPSC case number, in addition to contact information for the MPSC and the Office of Public Counsel. Ms. Meadows had abundant opportunities to participate in the regulatory process for the siting and routing of the Tiger Connector.

27. Revisiting the route for the Tiger Connector over a year after its approval, after an extensive public outreach process, a comprehensive Route Selection Study that was subject to Staff review, landowner intervenor participation in the evidentiary hearing, potential cross-examination, and Commission review, is antithetical to the integrity of the routing and siting process, to the Commission's New CCN Order approving the route, and to every other landowner along the Tiger Connector.

28. Adjusting the route in the manner requested by Ms. Meadows will have a ripple effect on other landowners in the area, including at least one landowner who did not receive notice of the Final Proposed (and approved) Route. It would also impact other landowners by moving it closer to residential structures to the west of Ms. Meadows' property, pushing the route into the middle of active agricultural fields, increasing tree clearing, and adding additional turning

structures. Subjecting landowners to these impacts without going through the proper routing analysis would create significant due process violations. Moreover, if the Commission permits retroactive, *ad hoc* adjustments to established transmission routes (other than micro-siting) it could significantly increase the cost of transmission to Missouri electric customers.

VI. Ms. Meadows' Proposed Alternative Route is Infeasible

29. Attached to Ms. Meadows' Rebuttal is an alternative route proposed by Ms. Meadows and a drone photo¹⁷ showing what Ms. Meadows claims is a "wide open and uninhabited area south of my property." The parcel to the southeast of Ms. Meadows' home (left side of the photograph) is already along the route of the Tiger Connector and will host three transmission structures once construction of the line commences. It is therefore not "wide open and uninhabited." The parcel to the southwest (right side of the photograph) belongs to the landowner¹⁸ whose parcel is not crossed by the approved route due to nearby constraints, which are discussed in greater detail below.

30. Ms. Meadows' claim that her proposed alternative route will not negatively affect any other residences in the vicinity is not correct. Ms. Meadows' proposed route will move the Tiger Connector closer to two residences and closer to two agricultural structures while also introducing new heavy angles and turning structures on neighboring properties, benefiting Ms. Meadows but increasing impacts on other landowner

31. Moving the path of the Tiger Connector at this late hour will result in impacts to multiple other landowners in the vicinity, which has significant due process implications for Ms. Meadows' neighboring landowners. Further, as noted in response to MPSC Staff DR 0003,¹⁹ when

¹⁷ See Prop Pic of Full Southern View Exhibit to Ms. Meadows' Rebuttal.

¹⁸ This parcel belongs to the new landowner discussed in Section II above.

¹⁹ MPSC Staff DR 0003 attached hereto as Exhibit A.

developing the Tiger Connector route through the area around Ms. Meadows' property, the Routing Team was constrained by the properties to the west and south of Ms. Meadows.

32. Immediately to the west of Ms. Meadows are multiple residences and agricultural buildings on the east side County Road 232. These structures limit Grain Belt Express' ability to enter the parcel south of Ms. Meadows, across County Road 260, in a manner that would avoid Ms. Meadows' property without placing the line closer to another home than the line currently is to Ms. Meadows' house. Avoiding both the structures on County Road 231 and Ms. Meadows' property would involve placing a turning structure on the property immediately to the west. However, this property appears to be in agricultural use, and general routing practice is to avoid placing turning structures in the middle of agricultural fields. Placing a structure there may also lead to increased tree clearing, and though this would move the line from Ms. Meadows' property, it would also require impacting a new landowner and potentially take the line closer than is preferable to a pond on that landowner's property.

33. Farther south from Ms. Meadows' property, Grain Belt Express is constrained by the need to enter the points of interconnect (AECI and MISO substations) from the north. In this area, the general alignment of the route attempts to support this goal while minimizing agricultural impacts and tree clearing and maximizing residential distance.

34. Ms. Meadows' proposed alternative route is not feasible for all of these reasons and it should be rejected by the Commission.

VII. Ms. Meadows' Concerns are Not Unique

35. Throughout her Complaint and her Rebuttal, Ms. Meadows restates her concerns regarding the potential impacts the Tiger Connector might have regarding health and safety, the potential for electric and magnetic fields ("EMF") exposure, the potential for the transmission line falling or causing a fire, tree and wildlife habitat removal, among others.

36. Grain Belt Express addressed those concerns in Section VI and VII of its Response to Ms. Meadows Formal Complaint on November 15, 2024.

37. But, with respect to EMF, Grain Belt Express notes that the Commission has addressed those issues in the context of the Project raised by public commenters about the impact of EMF on human health, animal health, and various other concerns in File No. EA-2016-0358. These issues were addressed thoroughly in the Direct Testimony of William Bailey filed in EA-2016-0358 on August 30, 2016. The Commission's CCN Order cited Mr. Bailey's Direct Testimony when stating that "the scientific weight of evidence does not support the conclusion that electric and magnetic fields cause any long-term adverse health effects, and the levels of electric and magnetic fields associated with the Project do not pose any known risk to human health." No evidence has been introduced by public commenters or intervenors to disturb that conclusion.

38. Additionally, in the context of the Project, public commenters raised similar concerns about EMF in File No. EA-2023-0017. These issues were addressed in the Direct Testimony of Aaron White on August 24, 2022 and the Surrebuttal Testimony of Aaron White on May 15, 2023. The Commission did not take up the issue in its Report & Order in File No. EA-2023-0017. And, again, no public commenter or intervenor introduced evidence to disturb that conclusion. Nor, has Ms. Meadows introduced expert testimony or evidence to disturb that conclusion in this proceeding.

39. In short, Ms. Meadows' concerns have been previously addressed by the Commission in the issuance of its CCN for the Project and if the Commission were to permit routing changes based upon Ms. Meadows' concerns, then that could lead to unfair outcomes for other landowners, collateral attacks on Commission decisions, and a significant increase in litigation of these issues.

VIII. Ms. Meadows' Complaint Does Not Demonstrate Any Violations of a Commission Order, Rule, or Tariff

40. As noted previously, Section 386.390 RSMo. authorizes the Commission to hear a complaint “setting forth any act or thing done or omitted to be done” by a public utility to determine whether there has been a violation of “any provision of law subject to the [C]ommission’s authority, of any rule promulgated by the [C]ommission, of any utility tariff, or of any order or decision of the [C]ommission.”²⁰

41. The only “act or thing done” by Grain Belt Express has been to site the Tiger Connector on the route approved by this Commission.

42. It is neither logical nor feasible to design a route that results in zero impacts to landowners that reside or own property along the route of the Tiger Connector. However, the robustness of the Routing Study and the degree to which the Routing Team balanced competing interests demonstrates that there has been no violation of any conditions, Protocols, or Orders applicable to Grain Belt Express. Ms. Meadows’ allegations refer to the Commission’s Findings of Fact in the New CCN Order that “[t]he Routing Team also tried to avoid built-up areas, residences” and “[t]he Project is designed to have a minimal impact on land.”²¹ Both of these Commission Findings of Fact remain accurate.

43. There has been no violation of any law, rule, tariff, or order of the Commission and Grain Belt Express has fully complied with its obligations in the Commission Orders, its approved Protocols, and has thoroughly engaged in micro-siting efforts with Ms. Meadows. Accordingly, Ms. Meadows’ Complaint has not demonstrated any violations, and her Complaint should be dismissed.

²⁰ Section 386.390 RSMo. (emphasis added).

²¹ *Id.* at p. 42.

IX. The Complaint Should be Dismissed for Failure to State a Claim

44. The Complaint has failed to state a claim upon which relief can be granted and should therefore be dismissed. Inasmuch as the Complaint argues for a new route for the Tiger Connector, it amounts to an untimely and impermissible collateral attack on the Commission's New CCN Order, which approved the route for the Tiger Connector and which was issued over a year ago. Further, the Complaint does not identify any law, rule, regulation, Commission order, or Protocol that has been violated by Grain Belt Express. Accordingly, the Commission should dismiss the Complaint in accordance with 20 CSR 4240-2.070(7), which provides, "[t]he [C]ommission, on its own motion or on the motion of a party, may after notice dismiss a complaint for failure to state a claim on which relief may be granted or failure to comply with any provision of these rules or an order of the commission, or may strike irrelevant allegations." Dismissal is also appropriate under 20 CSR 4240-2.116(4).²²

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²² "A case may be dismissed for good cause found by the commission after a minimum of ten (10) days notice to all parties involved." 20 CSR 4240-2.116(4).

WHEREFORE, Grain Belt respectfully requests that the Commission: (1) accept this Reply; (2) dismiss the Complaint for failure to state a claim upon which relief can be granted; and (3) for such further relief as the Commission may deem just and appropriate.

Respectfully submitted,

POLSINELLI PC

/s/ Anne E. Callenbach

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ATTORNEYS FOR RESPONDENT

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 6th day of December, 2024.

/s/ Anne E. Callenbach

Attorney for Respondents

Missouri Public Service Commission
Data Request

Data Request No.: 0003
Company Name: Grain Belt Express, LLC
Case/Tracking No.: EC-2025-0136
Date Requested: 11/6/2024
Issue: General Information & Miscellaneous - Other General Info & Misc.
Requested From: Nicole T. Luckey
Requested By: Andrea Hansen
Brief Description: Engineering Requirements

Description: List each specific engineering requirement that Grain Belt considered during the routing process for the Tiger Connector line segments that directly affect Cheri Meadows' property and the neighboring parcels. For the purposes of this data request "directly affecting" means if a permanent easement or other permanent property interest would be obtained over all or any portion of the land or if the land contains a habitable structure that would be within three hundred (300) feet of the centerline of an electric transmission line.

Due Date: 11/26/2024

RESPONSE:

When developing the Tiger Connector route through the area, the Routing Team was constrained by the properties to the west and south of Ms. Meadows. Immediately to the west of Ms. Meadows are multiple residences and agricultural buildings on the east side of County Road 232. These structures limit Grain Belt Express' ability to enter the parcel south of Ms. Meadows, across County Road 260, in a manner that would avoid Ms. Meadows' property without placing the line closer to another home than the line currently is to Ms. Meadows' house. Avoiding both the structures on County Road 231 and Ms. Meadows' property would involve placing a turning structure on the property immediately to the west. However, this property appears to be in agricultural use, and general routing practice is to avoid, when possible, placing turning structures in the middle of agricultural fields. Placing a structure there may also lead to increased tree clearing, and though this would move the line from Ms. Meadows' property, it would also require impacting a new landowner and potentially take the line closer than is preferable to a pond on that landowner's property.

Farther south from Ms. Meadows' property, Grain Belt Express is constrained by the need to enter the points of interconnect (AECI and MISO substations) from the north. In this area, the general alignment of the route attempts to support this goal while minimizing agricultural impacts and tree clearing and maximizing residential distance.

For a representation of routing constraints on Ms. Meadows' and neighboring parcels, please see the aerial map attached hereto as **Attachment A**.

VERIFICATION OF RESPONSE

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

Signed: /s/ Kevin Chandler
Director of Transmission Business Development
Invenergy, LLC







MTC Route

Route after micrositing

Staff DR 0003

Attachment A

Legend

-  Cheri Meadows Parcels
-  Nearby Buildings
-  Pond
-  Structure
-  Tiger Connector Centerline
-  Tiger Connector ROW

