

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

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

**Response in Opposition to Motion to Dismiss**

**COMES NOW** the Office of the Public Counsel (“OPC”) and for its response in opposition to Grain Belt Express LLC’s motion to dismiss, states:

1. On October 15, 2024, the Complainant, Ms. Cheri Meadows, filed a formal complaint against Grain Belt Express LLC. Ms. Meadows’ Complaint details the issues she has with Grain Belt’s plan to build a transmission line across her property, including concerns that the new line will impact the “safety and enjoyment” of her property due to its proximity to her home, driveway, and power line.

2. On January 24, 2025, Grain Belt filed a response to the Staff’s Report and a motion to dismiss the Complaint. Grain Belt requests dismissal “[b]ecause Ms. Meadows has failed to identify any law, rule, regulation, Commission order, or Protocol that has been violated by Grain Belt Express.”

3. The OPC files this response because the public interest is best served by allowing the Missouri public to file complaints, as they are lawfully

entitled to do under Sections 386.390 RSMo, without an attorney's understanding of the applicable laws or regulations. Even if a complainant does not cite to a particular law or regulation, the public should still have their cases heard when a complaint explains in practical terms the basis for the complaint, and a law, rule, order, or tariff may be implicated by the allegations raised in the complaint.

4. For example, Ms. Meadows questions the safety of Grain Belt's proposal due to its proximity to her home, driveway, and power line. Complaints regarding safety issues are guided by Section 386.310 RSMo, which states in part, "*The commission shall have power, after a hearing had upon its own motion or upon complaint, by general or special orders, rules or regulations, or otherwise, to require every person, corporation, municipal gas system and public utility to maintain and operate its line, plant, system, equipment, apparatus, and premises in such manner as to promote and safeguard the health and safety of its employees, customers, and the public.*"

5. Likewise, Section 393.140(5) RSMo permits the Commission upon complaint to find that the acts of a public utility are not just and reasonable, and to order "*the just and reasonable acts and regulations to be done and observed.*" Both Sections 386.310 and 393.140 RSMo are implicated by the issues raised in Ms. Meadows' Complaint.

WHEREFORE, the Office of the Public Counsel respectfully urges the Commission to deny Grain Belt's motion to dismiss and allow Ms. Meadows to continue pursuing her Complaint should she wish to do so.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the Complainant and all counsel of record this 27<sup>th</sup> day of January 2025.

**/s/ Marc Poston**

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