

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

**CHERI MEADOW’S REPLY TO OFFICE OF PUBLIC COUNSEL’S RESPONSE IN OPPOSITION TO GRAIN BELT EXPRESS LLC’S MOTION TO DISMISS AND REQUEST FOR HEARING**

I, Cheri Meadows hereby files this Reply to the January 27, 2025 Office of the Public Counsel (“OPC”) Response in Opposition to Grain Belt Express LLC’s (“Grain Belt Express”) Motion to Dismiss and requests a hearing. In support of my Reply and request, I state the following:

**I. Background**

1. On October 15, 2024, I filed a formal complaint with the Missouri Public Service Commission (“PSC”) asking that Grain Belt be required to move their Tiger Connector Line (“Line”, “the Line”) south of my property approximately 600 feet where it would not be near any residence, nor jeopardize anyone’s property, health, or safety.

2. On January 17, 2025, the Staff of the Missouri Public Service Commission (“Staff”) submitted its Staff Report where it concluded that Grain Belt did not violate any tariff,

rule, statute, or Commission order related to my complaint. I responded to Staff Report with additional information about how by not “avoiding residences” and not exercising “minimal impact to land” Grain Belt Express is creating an excessive burden on my property and use and enjoyment of it as well as inflicting undue harm on me and my pets in my daily use of my property as well as any future residents of the property via EMF as well as potential loss of cell phone use.

## **II. Response to OPC**

3. In section 3 of their response, the OPC stated “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.” From the beginning, I have cited that Grain Belt Express violated the EA-2023-0017 Order (per page 42, line 140) “The Routing Team for the Project also tried to avoid built-up areas, residences...” and also line 138, “The Project is designed to have minimal impact to land.” I have followed up by providing extensive exhibits and arguments as to how negatively impactful and potentially dangerous the location of this Line on my property will be.

4. My driveway is a vital part of my land and my use and enjoyment of it. It is essentially an extension of my yard that I use daily to walk with my animals and spend a lot of time maintaining. In my responses, including my response to Staff Report, I provided numerous pieces of evidence that show EMF exposure can be harmful to both humans and animals. OPC’s reference of 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.*” applies to the evidence I provided and my concerns about this Line being over my residential property as opposed to the cow pasture with no residences or any other structures located just a few hundred feet south of the proposed route.

5. I agree with OPC’s reference to Section 393.140(5) RSMo that permits the Commission upon complaint to find that the acts of a public utility are not just and reasonable and orders “*the just and reasonable acts and regulations to be done and observed.*” As I’ve cited throughout my complaint and responses, by locating this line so near my residence and the one area of my property that I use daily and spend hundreds of hours every year on, Grain Belt Express will be creating an excessive burden on me, my property, and my enjoyment and use of it. Grain Belt Express choosing to put their Line across my property where they are is not “just or reasonable” when the solution to the many burdens and destruction it will cause is for them to just follow the Commission order of avoiding residences and minimizing impact to land. Both of these Orders would be accomplished by moving the Line south a few hundred feet of where it is crossing my property.

### **III. Request for Hearing**

6. As a pro se party in this case, I am not able to cite all of the appropriate statutes and regulations that Grain Belt Express and its four attorneys are able to, but that does not mean that my complaint is without merit and should be dismissed. As the OPC has pointed out with their references to Sections 386.310 and 393.140 RSMo, as well as all of the evidence and arguments I have presented, there is ample proof that I have a valid complaint and should be granted a hearing.

Respectfully Submitted,

*/s/ Cheri Meadows*

Cheri Meadows