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

Cheri Meadows,	)
Complainant,	)
	)
V.	)
	)
Grain Belt Express, LLC,	)
	)
Respondent.	)

File No. EC-2025-0136

#### **GRAIN BELT EXPRESS LLC'S LIST OF ISSUES**

**COMES NOW** Grain Belt Express LLC ("Grain Belt"), by and through counsel and submits this *List of Issues* for the Missouri Public Service Commission's ("Commission's") information and consideration.

#### **I. List of Issues**

1. Did Grain Belt Express, LLC ("Grain Belt") fail to follow the siting criteria outlined in the Commission's Report and Order granting Grain Belt a certificate of convenience and necessity in File No. EA-2023-0017, specifically (1) has Grain Belt not tried to avoid built up areas and residences (Complainant's residence specifically), and (2) is the Grain Belt transmission project not designed to have a minimal impact to land (Complainant's land specifically)?<sup>1</sup>

2. If the Commission determines that Grain Belt violated the two points noted above, what relief, if any, is appropriate?

<sup>&</sup>lt;sup>1</sup> Pursuant to the Commission's March 5, 2025 Order Denying Motion to Dismiss and Directing Staff to File a *Proposed Procedural Schedule*, these are the potential violations articulated by the Complainant. The two points are paraphrased portions of Findings of Fact Nos. 138 and 140 in the Commission's Report and Order in File No. EA-2023-0017.

#### **II.** Order of Opening Statements, Order of Witnesses and Order of Cross-Examination

Grain Belt concurs with the Order of Opening Statements, Order of Witnesses, and Order of Cross-Examination as set forth in the *List of Issues, Order of Witnesses, and Order of Cross-Examination* filed by the Commission Staff, as joined by the Office of Public Counsel and Ms. Meadows.

**WHEREFORE,** Grain Belt respectfully submits its *List of Issues* for the Commission's information and consideration.

Respectfully submitted,

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Isl Anne E Callenbach

Anne E. Callenbach MBN 56028 Andrew O. Schulte MBN 62194 Sean Pluta MBN 70300 Polsinelli PC 900 W. 48<sup>th</sup> Place, Suite 900 Kansas City, MO 64112 Telephone: (816) 572-4760 Facsimile: (816) 817-6496 acallenbach@polsinelli.com aschulte@polsinelli.com

ATTORNEYS FOR GRAIN BELT EXPRESS LLC

# 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 16th day of April, 2025.

|s| Anne E. Callenbach

Attorney for Respondents