

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

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

**GRAIN BELT EXPRESS LLC’S REPLY TO MEADOWS REPLY TO MOTION FOR
CLARIFICATION**

Grain Belt Express LLC (“Grain Belt Express”) hereby files this Reply to Cheri Meadow’s June 27, 2025 Reply (“Meadows Reply”) to Grain Belt Express’ Motion for Clarification (“Motion”) of the Commission’s April 23, 2025 *Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing* (“Order”). In support of its Response Grain Belt Express states as follows:

I. The Pending Motion

1. The Motion seeks clarification as to the scope of the discovery process contemplated in the Commission’s Order. As discussed in the Motion and its Response¹ to Office of Public Counsel’s Reply,² Grain Belt Express understands that discovery is limited to the new allegations contained in Ms. Meadow’s March 21 *Reply to Grain Belt Express’ Motion for Reconsideration* in recognition that the discovery process for Ms. Meadow’s original allegations

¹ *Grain Belt Express LLC’s Response to Office of Public Counsel’s Reply to Motion for Clarification*, June 23, 2025.

² *Public Counsel’s Reply to Grain Belt Express LLC’s Motion for Clarification*, June 20, 2025.

had closed in April 2025 and that discovery was only reopened to accommodate inclusion of the new and additional allegations.

2. Grain Belt Express' position in the Motion remains unchanged and for the reasons expressed therein, Grain Belt Express requests the Commission grant the Motion.

II. Reply to Meadows Reply

3. The Meadows Reply is largely non-responsive to the arguments expressed in Grain Belt Express' pending Motion. However, Paragraph 10 of the Meadows Reply underscores the need for the Commission's clarification—Grain Belt Express and Ms. Meadows have very different understandings of the scope of the discovery process set forth in the Order. Ms. Meadows sees the Order as a license for her to seek discovery on her new allegations, her original allegations, and potentially the entire line siting case to the extent Ms. Meadows feels it applies to her case.³ Grain Belt Express opposes that view.

4. Section I of the Meadows Reply (pp. 1-5) relitigates the issue of how the Commission should interpret the original allegations in her formal complaint. The pending Motion is not a motion to dismiss the formal complaint, nor is it a motion to strike her pleadings. The Motion simply seeks to clarify the scope of the new discovery process opened to process Ms. Meadows "new" and "additional allegations"⁴ set forth outside of the formal complaint in her March 21, 2025, *Reply to Grain Belt Express LLC's Motion for Reconsideration*.

³ "While Grain Belt alleges they understood the opening of discovery to be only for the additional claim I addressed in my reply to their Motion for Reconsideration, that is not how I understood the reopening of discovery, hence why I've continued to submit data requests as I look back over previous responses to data requests and motions, as well as some of the particulars of EC-2023-0017 that I feel apply to my case in its entirety." Meadows Reply, ¶ 10.

⁴ Order at 1.

5. Rather than define what those new and additional allegations are, Ms. Meadows attempts to insert even more allegations that apparently relate back to the substance of her formal complaint.⁵ This is not the proper opportunity for Ms. Meadows to insert those arguments and testimony and should be ignored.

6. Section II of the Meadows Reply appears to reflect Ms. Meadow's interpretation of the Commission's Order and contains a request that the Commission extend the discovery period in light of the fact that Ms. Meadows is *pro se*. As noted above, the gap between Grain Belt Express' understanding of the Order and Ms. Meadow's understanding necessitates clarification.

7. Section II of the Meadows Reply also makes clear the danger in allowing an open-ended forum for discovery. Discovery is a vehicle to probe allegations set forth in a complaint. It appears that Ms. Meadows views discovery as a vehicle to create a complaint. Missouri courts frown upon use of discovery as a "factual dragnet or fishing expedition."⁶ But it is clear from Ms. Meadows' argument that she believes that she can use discovery as a dragnet for any information relating to Grain Belt Express' line siting process, regardless of what is alleged in this matter.

⁵ Meadows Reply at ¶¶ 6-9.

⁶ *Concerned Citizens for Crystal City v. City of Crystal City*, 334 S.W.3d 519, 523 (Mo. Ct. App. 2010) citing *Mischia v. St. John's Mercy Medical Center*, 30 S.W.3d 848, 864 (Mo.App.2000).

WHEREFORE, Grain Belt respectfully requests that the Commission grant its Motion for Clarification.

Respectfully submitted,

POLSINELLI PC

/s/ Andrew O. Schulte

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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 7th day of July, 2025.

/s/ Andrew O. Schulte
Attorney for Respondents