

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

|                                       |   |                       |
|---------------------------------------|---|-----------------------|
| Missouri Landowners Alliance, and     | ) |                       |
| Eastern Missouri Landowners Alliance  | ) |                       |
| DBA Show Me Concerned Landowners, and | ) |                       |
| John G. Hobbs,                        | ) |                       |
|                                       | ) |                       |
| Complainants,                         | ) |                       |
|                                       | ) |                       |
| V.                                    | ) |                       |
|                                       | ) | Case No. EC-2021-0059 |
| Grain Belt Express LLC, and           | ) |                       |
| Invenergy Transmission LLC            | ) |                       |
|                                       | ) |                       |
| Respondents.                          | ) |                       |

JOINT MOTION TO TEMPORARILY SUSPEND PROCEDURAL SCHEDULE

The Staff of the Missouri Public Service Commission (“Staff” and “Commission”, respectively), Missouri Landowners Alliance, Eastern Missouri Landowners Alliance, d/b/a Show-Me Concerned Landowners, and John G. Hobbs (together, “Complainants”), and Invenergy Transmission LLC (“Invenergy Transmission”), together with Grain Belt Express LLC (“Grain Belt” and together with Invenergy Transmission, the “Respondents”) (Staff, Complainants and Respondents collectively, the “Joint Movants”), hereby file this *Joint Motion to Temporarily Suspend Procedural Schedule*. In support of this Joint Motion, Joint Movants state the following:

**I. Abridged Background**

1. On September 2, 2020, Complainants filed a Complaint with the Commission, alleging that Respondents’ contemplated changes to the Grain Belt Express Project (the “Project”), as discussed in a website posting and press release, invalidated the Certificate of Convenience and Necessity (“CCN”) granted to Respondent Grain Belt in Case No. EA-2016-0358 (the “CCN case”).

2. For the sake of brevity, and in light of the fact that the full procedural history of this proceeding has been set forth in recent pleadings and Orders of the Commission, Joint Movants will not restate the full procedural history here.

3. The Commission's January 6, 2021 Order Regarding Motion for Clarification and Suspension of Requirement to File Procedural Schedule directed Joint Movants to submit a proposed procedural schedule no later than January 11, 2021. Joint Movants filed a proposed procedural schedule on January 11, 2021.

4. On January 20, 2021, the Commission issued an order establishing a procedural schedule for this proceeding. The procedural schedule ordered by the Commission is as follows:

| <b>Event</b>   | <b>Date</b>       |
|--|-------------------|
| Deadline for Motion to Compel on Existing Discovery Requests   | February 2, 2021  |
| Complainants' Direct Evidence  | February 26, 2021 |
| Respondents Rebuttal Testimony & Staff Rebuttal Testimony/Report   | March 12, 2021    |
| Complainants' Surrebuttal Testimony  | March 19, 2021    |
| Final Day to Submit Discovery  | March 23, 2021    |
| Joint list of issues, list of direct examination exhibits, order of witnesses, order of parties for cross-examination, order of opening statements | March 23, 2021    |
| Position Statements  | March 26, 2021    |
| Evidentiary Hearing  | April 1, 2021     |
| Simultaneous Post-Hearing Briefs   | April 16, 2021    |

5. The Commission's Order noted Joint Movants' agreement from their January 11, 2021 Joint Motion that "if there are unresolved discovery disputes after February 17, 2021, they will seek to suspend or extend the procedural schedule."

6. An Order Regarding Motion to Compel appeared on the Commission's Agenda meeting schedule for February 17, 2021, but was removed from discussion at the outset of the Agenda meeting. Accordingly, Joint Movants respectfully request that the procedural schedule be temporarily suspended until such time as an Order on the pending Motion to Compel is issued. Joint Movants commit to filing a proposed new procedural schedule within three (3) business days following issuance of an Order on the Motion to Compel.

WHEREFORE, Joint Movants respectfully request that the Commission grant this Joint Motion to Temporarily Suspend Procedural Schedule, and for any such further relief as the Commission may deem just and appropriate.

Respectfully submitted,

*/s/ Anne E. Callenbach*

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ATTORNEY FOR COMPLAINANTS

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 19th day of February, 2021.

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Attorney for Respondents