

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 MEADOWS' MOTION FOR RECONSIDERATION**

Pursuant to 20 CSR 4240-2.160(2), I, Cheri Meadows, hereby files this Motion for Reconsideration (“Motion”) of the Commission’s July 21, 2025 *Order Denying Motion to Compel* (“Order Denying Motion to Compel”). In support of my Motion, 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 Express, LLC (“Grain Belt Express”) 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 November 15, 2024, Grain Belt Express requested that my Formal Complaint be dismissed for failure to state a claim, asserting that I did not identify any law, rule, regulation or Commission Order that Grain Belt Express allegedly violated.

3. On January 17, 2025, the Staff of the Missouri Public Service Commission (“Staff”) filed its report in my case. In response, on January 24, 2025, Grain Belt Express again renewed its previous motion for my case to be dismissed.

4. On March 5, 2025, the Commission filed its Order denying Grain Belt Express, LLC’s Motion to Dismiss following a procedural conference on February 20, 2025 where both the Office of Public Counsel (“OPC”) and Staff agreed there was a potential violation of the two points of the Commission’s Report and Order granting Grain Belt Express a certificate of convenience and necessity (“CCN”) in File No. EA-2023-0017. Those two points I argued were violated were that Grain Belt Express did not avoid residences and that their project would have a major impact to my land. The Commission agreed, stating in the Order Denying Motion to Dismiss, *“The Commission agrees with Staff and Public Counsel and finds that Complainant has articulated a potential violation sufficient for the Commission to hear her complaint.”*

5. On March 14, 2025, Grain Belt Express filed a Motion for Reconsideration arguing that *“the Commission’s reliance on “two points” which are merely Findings of Fact is in error and result in an unlawful, unjust, and unreasonable denial of its Motion to Dismiss.”* Grain Belt Express argued that my assertion that Grain Belt Express did not avoid residences or have a minimal impact to land as stated on lines 138 and 140 in the Commission’s New CCN Order in File No. EA-2023-0017, was only a violation of Findings of Fact.

6. On March 21, 2025 I filed a Reply to Grain Belt Express’ Motion for Reconsideration of their Motion to Dismiss that the Commission denied. After reading over the 110 page Report and Order for File No. EA-2023-0017 for Grain Belt Express’s CCN, and actually understanding it after having been involved with the PSC process for several months at

that time, I added to my claim that Grain Belt Express violated Commission Ordered Paragraph No. 9, listed on pages 73-74, Regarding the Landowner Protocol and Code of Conduct.

7. On March 31, 2025, Grain Belt Express moved to strike my March 21, 2025 Reply, arguing that the Reply was procedurally improper, didn't respond to Grain Belt Express' Motion for Reconsideration, and was in violation of Grain Belt Express' procedural due process rights in that it asserted new and previously unraised claims.

8. On April 21, 2025, Judge Clark convened a prehearing conference at the parties' request. After I offered to file a new formal complaint with my amended claim from my March 21, 2025 Reply to Grain Belt Express' Motion for Reconsideration, resulting in the claims process restarting, Judge Clark asked the parties if they would object to incorporating the new allegations into the existing complaint. He also indicated that would include reopening discovery and providing time for Grain Belt Express to answer the new allegations and for Staff to file a supplemental report. No party objected.

9. On April 23, 2025, the Commission issued its Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing, which directed Grain Belt Express to file a Response to the new allegations by May 21, 2025. Grain Belt Express' Response was filed on May 21, 2025 in which they asserted that the new allegations were unfounded.

10. On May 23, 2025 I filed a Motion to Compel Grain Belt Express to respond to my Data Request ("DR") numbers 18 and 19 after they initially filed objections. After learning from Grain Belt's counsel on May 30, 2025 that a 'meet and confer' was the appropriate avenue to take before filing my Motion to Compel, we agreed to a phone conference on June 3, 2025 to discuss their objections. Not satisfied with the responses I received from Grain Belt Express' Counsel, on June 6, 2025, I requested a Discovery Conference.

11. On June 12, 2025 a Discovery Conference was held in which Judge Clark went back and forth on Grain Belt Express producing a Privilege Log for DR 18. He indicated before concluding the Conference that he hoped Grain Belt Express and I could work out the discovery issues between us without involving him, but if not possible, he wanted me to file a Motion to Compel.

12. On June 17, 2025 Grain Belt Express filed a Motion for Clarification of Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing. Grain Belt Express had understood from the prehearing conference that discovery would be limited to only the new claims. Office of Public Counsel filed a Response on June 20, 2025 and I filed my Response on June 27, 2025.

13. On June 27, 2025 I called Grain Belt Express Counsel to discuss their objections to DR 11, 13, 18, 19, 21, and 22. I was able to get suitable details regarding all DR's except 13, 18, and 22. Per Anne Callenbach, I needed to be more specific on DR 13 regarding who I sought the requested information from and resubmit as a new DR.

14. On July 3, 2025 I filed my Motion to Compel for DR 18 and 22 as well as requested a Discovery Conference.

15. On July 10, 2025 a Discovery Conference was held where what I was seeking from my DR 18 and 22 was discussed, as well as clarification that the discovery process wasn't meant to be limiting. That same day, the Office of Public Counsel filed a Motion to Extend Discovery, which was also granted during the Conference.

16. On July 14, 2025 Grain Belt Express filed a Response to my Motion to Compel arguing that my privacy log request for DR-18 was a discovery request concerning conversations about my discovery and my windshield survey and field reconnaissance documentation request

in DR-22, failed to show them any logical relevance to my allegations and was essentially too much trouble and expense for them to get from WSP, Inc., the third-party contractor they hired to assist in the route selection study.

17. On July 21, 2025 the Commission issued an Order Denying my Motion to Compel DR 18 on the grounds that the DR is moot because Grain Belt Express has already provided an answer. DR-22 was denied due to relevance not being established.

## **II. Motion for Reconsideration Regarding DR 18 and Privacy Log Request**

18. On page 78 of Schedule AB-2, Appendix A: Routing Team, shown below, both Jason Brown and Greg Smith are listed as part of the Routing Team. With both of their roles indicated as “Public outreach”, both should be very familiar with talking to landowners, taking notes on those interactions, and explaining how the routing criteria and process works.



PUBLIC

Schedule AB-2

Member	Affiliation	Title	Specific Role
Henry Abrams	Inverenergy Transmission	Project Engineer, Renewable Electrical Engineering	Engineering and siting support
Jason Brown	Inverenergy Transmission	Director of Land and Community Affairs	Public outreach
Margaret Campbell	Inverenergy Transmission	Senior Analyst, Transmission Public Affairs	Public outreach
Kevin Chandler	Inverenergy Transmission	Director, Transmission Business Development	Project director, project development, public outreach, and siting support

<b>Brad Pnazek</b>	Invenergy Transmission	Vice President, Transmission Development	Project development, siting support, public outreach
<b>Ryan Raichelson</b>	Invenergy Transmission	Senior Analyst	Project development and siting support
<b>Jen Stelzleni</b>	Invenergy Transmission	Senior Manager, Environmental Compliance & Strategy	Environmental lead and siting support
<b>Aaron White, PE</b>	Invenergy Transmission	Senior Transmission Engineering Manager, Electrical Engineering	Engineering and siting support
<b>Patrick Whitty</b>	Invenergy Transmission	Senior Vice President, Invenergy Transmission	Project director, siting support, public outreach
<b>Aaron Baker</b>	Clout Public Affairs	Vice President	Public Outreach
<b>Greg Smith</b>	CLS	Lead Land Representative	Public outreach
<b>Adam White</b>	CLS	Director of Utilities	Public outreach

19. Despite their ‘Specific Role’ both listed as ‘Public outreach’, neither Jason nor Greg ever conveyed to me that they were on the ‘Routing Team’ for the Tiger Connector or what Greg’s role/purpose was in coming to my house. I was never given a business card with job title or contact information listed from anyone, including Jason Brown, whom I had met with and spoken to numerous times for two years. During our in-person interactions and multiple phone conversations, Jason Brown never mentioned that he was on the routing team or involved with The Tiger Connector route in any way. When I questioned him on a few occasions about why the Tiger Connector was put over my land instead of the nearby empty cattle pasture, including on that day in March 2024 that he came to my house, he always replied simply and without elaborating in any way, “I don’t know.”.

20. Given their lack of transparency with me regarding their knowledge and involvement in selecting the Tiger Connector route that I have been fighting so hard to prevent from destroying my property and posing numerous safety risks, I question how much of the conversations Jason admitted he and Greg had about me, both prior to their visit to my home and

after, revolved around conspiring to keep me in the dark. By not being forthcoming about their involvement in the routing process or how the PSC process worked, my ignorance and lack of understanding only benefited them in slow-walking the project along until too much time had passed for me to possibly get the line moved off of my property. That goes along with Jason's false claim that day in March 2024 that the project being built was inevitable and construction would be starting at the end of 2024 or first part of 2025.

21. Given everything I have shared about the deceit and manipulation tactics both Jason Brown and Greg Smith used regarding their interactions with me, it seems prudent that the Commission request a privilege log of all of the information that Grain Belt Express claims is "privileged", as indicated during the June 12, 2025 Discovery Conference where Anne Callenbach told the Commission "...there are no notes that are not privileged."

### **III. Motion for Reconsideration Regarding DR 22 and Windshield Survey and Field Reconnaissance Documents**

22. In DR 22, originally submitted on June 18, 2025, I requested the following:

According to Grain Belt Express, LLC's Route Selection Study (Schedule AB-2, Section 2.4.2), windshield surveys and field reconnaissance were conducted on conceptual routes and potential routes.

Please list the dates of those windshield surveys and reconnaissance trips that were done regarding my property. Also, please list who was present during them and all documentation from them regarding my property.

23. Per Anne Callenbach's explanation during the Discovery Conference on July 10, 2025, *"...the purpose of the windshield studies is to make certain that sort of facts on the ground match what the company and the routing team have seen in satellite images. It's simply to make sure that GIS and facts on the ground are consistent with each other, that there has not been a new barn or a private airstrip or, or something that is not recognizable on GIS that is now on the*

*ground that would interfere with, with routing considerations. That's, that's really the point of the windshield survey."*

24. According to page 11 of the 'Tiger Connector 345 kV Transmission Line Route Selection Study (Schedule AB-2), section 2.4.2 FIELD RECONNAISSANCE, "In April, June, and July 2022, Routing Team members conducted windshield surveys of the Conceptual Routes and Potential Routes from public roadways and compared observed features to data contained in the GIS database."

25. My issue and point of discovery regarding this survey and reconnaissance is that from the road off of my drive, due to the topography and heavily wooded landscape, it is impossible to determine if there is anything at all on my property in the path of the proposed route. Given how narrow my property is sitting amongst literally hundreds of acres of open and house-free cropland, fields, and cow pastures, I question whether the Routing Team members even acknowledged for sure that there was a residence at the end of the long drive at the property they allegedly surveyed from the roadway. If they used the satellite imagery and their other methods of research to conclude that there was, did they take any note of the obvious fact that there was no other entry/exit to the property than the one drive? Did they note how narrow and heavily wooded my property was that was unequivocally contrary to their "avoiding residences" and "minimal impact to land" criteria and statements they would make to the Commission? Were there notes made about the numerous private drive and no trespassing signs posted at the entrance, as well as the fact that the drive was well maintained and mowed down the sides, indicating that whoever lived there obviously cared about the aesthetics of their property? Were the numerous large, healthy 50 ft. and taller trees on the property that would have to be cleared,

indicated? Lastly, was it noted that to the immediate east of my property sits active cropland, which the routing team claims they attempted to minimize impacts to?

26. When I talked to Jason Brown at the public open house in Fulton, MO in July 2022, I was adamant and crystal clear that I did not want the Tiger Connector going over my drive, the only entry/exit to my house, and over my existing electrical line when there was a much more logical, safer, less destructive, and overall better option slightly south of my property in the form of a cow pasture with no residences or structures of any kind.

27. Jason Brown, who never indicated to me that he was a member of the Routing Team, and according to page 29 of the same Schedule AB-2 referenced in line 24 above, in section 4.4.2 REVISIONS TO THE POTENTIAL ROUTE NETWORK, notes *“Immediately following public meetings, the Routing Team met to review comments that were written on comment cards or maps, shared in conversation with Project representatives, and submitted online... In addition to making the Routing Team aware of general landowner concerns about the Project, these meetings provided an opportunity to revise the Potential Routes...”*. After sharing my serious and valid concerns about the line going across my property with Jason, he never mentioned he would bring them up in the meeting they would be having after the public hearing closed. Instead, he just recommended that when I filled out my comment card, I indicate that they should route the line to come up from the south, along on the edge of the SW corner of my property.

28. Whether any of the details about my property I mentioned above were included in the windshield survey and field reconnaissance is important in establishing if routing the Line across my property, the only residential property on a one-mile stretch of road, was accidental,

intentional, or just negligent, given all of the serious risks that I will be subjected to by the Line's placement across my property.

#### **IV. Conclusion**

29. I have provided numerous details and evidence regarding my March 2024 in-person meeting with Jason Brown and Greg Smith, who seemingly had no prior affiliation with my property, but happened to be on the Tiger Connector Routing Team, and was inexplicably brought to what I believed was an in-person meeting in an attempt to get the Line moved off of my property by showing the risks and devastation the Tiger Connector Line would cause to my property from an on-the-ground perspective.

30. Despite Grain Belt Express' word salad claim of me "requesting discovery concerning conversations about her discovery", my DR 18 was merely an attempt to obtain any documentation regarding conversations that Jason Brown and Greg Smith had about me and/or my property, both before and after their visit to my property, and that Jason Brown indicated took place in my presence.

31. Since Grain Belt Express has indicated that only "privileged" information exists regarding Jason Brown's and Greg Smith's conversations, I am seeking a privilege log to be produced for the Commission to determine if that visit in March 2024 was a deliberate attempt to keep me in the dark about the PSC process and get me to give up on trying to get the Line moved off of my property by feigned assistance in moving it, while still posing all the same destruction and risks I have always wanted to avoid.

32. By seeing the details of the windshield survey and field reconnaissance of my property, I can at least determine if Grain Belt acknowledged my land having a residence. The information could also potentially reveal some valid reason(s) why Grain Belt Express hasn't

even considered any steps to re-route the Line off of my property despite over three years of my pleas to them to do so.

WHEREFORE, I respectfully submit my Motion for Reconsideration of the Commission's Order Denying Motion to Compel.

Respectfully Submitted,

/s/ Cheri Meadows

Cheri Meadows