

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

Cheri Meadows,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>File No. EC-2025-0136</u></b>
	)	
Grain Belt Express, LLC,	)	
	)	
Respondent.	)	

**GRAIN BELT EXPRESS LLC’S LIST OF ISSUES**

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

2. Did Grain Belt Express (1) prevent Ms. Meadows from contacting the Commission regarding the route for the Tiger Connector; and/or (2) deliberately omit and withhold information regarding the Commission’s route approval process?<sup>2</sup>

<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.

<sup>2</sup> Ms. Meadows’ March 21, 2025 Reply to Grain Belt Express’ March 14, 2025 Motion for Reconsideration contained new and additional allegations against Grain Belt Express. During the April 21, 2025 prehearing conference, Judge Clark polled the parties to ascertain objections to incorporating Ms. Meadows’ new allegations into this existing complaint proceeding. No party objected, discovery was reopened, Grain Belt was permitted to file a response to the new allegations, and Staff filed a supplemental report regarding the new allegations.

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

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

4. 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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/s/ Anne E. Callenbach

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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 5th day of August 2025.

Anne E. Callenbach

Attorney for Respondents