

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' POST-HEARING BRIEF

COMES NOW I, Cheri Meadows, (“Ms. Meadows”) respectfully file my post-hearing brief to the Missouri Public Service Commission (“PSC”):

I. Background and Procedural History

1. On October 15, 2024, the Complainant, Cheri Meadows (“Ms. Meadows”) filed a Formal Complaint requesting that the Missouri Public Service Commission (“PSC”) require Grain Belt Express, LLC (“Grain Belt”) “...to move their Tiger Connector line approximately 600 feet south of its current path across my property and drive, resulting in the line not being near any residence nor jeopardize anyone’s property, health, or safety.”. Ms Meadows pointed out that by routing the line over her driveway and existing electrical line, Grain Belt violated “the order” of “The Routing Team for the Project also tried to avoid built-up areas, residences...”. Ms. Meadows also referenced “The Project is designed to have a minimal impact to land.”. It is obvious that Ms. Meadows believed those “Findings of Fact” were Commission “Orders”, as she had no prior experience filing a formal complaint with the PSC or how the

system worked. She did, however, under section 8 of her complaint, cite some dealings with Grain Belt, including how representatives from Grain Belt were not able to tell her why they couldn't avoid her property, an email she sent to Kevin Chandler about her concerns being ignored (Binder, Ex. 104, Tab N), and false statements made to the Attorney General's Office regarding how Grain Belt claimed they were "...committed to considering reasonable reroute proposals from landowners, will respond in writing to reroute requests, and will track and follow through with its obligations to landowners." (Item No. 112, Polsinelli Letter to AG dated July 30, 2024 Exhibit) Ms. Meadows wrote, "This is also contradictory to the Landowner Protocol (which states that Grain Belt Express strives to implement the following key elements as part of its approach to easement negotiations." "Providing clear information to landowners on the routing criteria used by Grain Belt Express;". (File No. EC-2025-0136, Item No. 1, Formal Complaint)

2. On November 15, 2024, Grain Belt filed a Response to Ms. Meadows' Formal Complaint, completely ignoring her reference to her numerous experiences with Grain Belt representatives being contradictory to their Landowner Protocol. Instead, they insisted Ms. Meadows did not demonstrate any violation of a Commission Order, Rule, or Tariff. (Item No. 7, Pg. 5, Response to Formal Complaint)

3. After months and numerous attempts by Grain Belt to get her case dismissed, Ms. Meadows, an inexperienced pro se Complainant, now more experienced with the legal terms, protocols, and rules for filing a complaint, offered to file a new complaint. When just amending the current complaint to include the more detailed new allegations was offered, Grain Belt did not object.

4. Finally, on August 20, 2025, Ms. Meadows' hearing was held, during which she shared some of the same facts of her experience with Grain Belt that she has consistently shared since filing her formal complaint and that have not changed.

II. Applicable Regulations

5. **§ 386.390, RSMo:** This statute allows a person to file a complaint with the PSC against a public utility for any act or thing that "is claimed to be in violation of any provision of law or of any rule or order or decision of the commission".

6. **§ 393.140(5), RSMo:** This statute mandates that a public utility's actions must be "just and reasonable."

III. Grain Belt Express's Lack of Transparency and History of Misleading Representations

7. On July 27, 2022, After receiving a letter from Grain Belt Express indicating that her property was being considered for one of the Tiger Connector route options, Ms. Meadows attended the Tiger Connector Public Meeting in Fulton, MO.

8. Ms. Meadows attended the meeting because she was extremely upset to learn that a high-voltage transmission line might cross her narrow strip of land containing her 1/4-mile long drive and existing electrical line when there were no other residences or structures of any kind along her 1-mile stretch of road. She attended the meeting believing she only needed to share that someone lived on that land and the line would be crossing over her only entry/exit and existing electrical line for the possibility of the route going through her land to be changed.

9. When Ms. Meadows got to the map of her property, she was met by a female Grain Belt employee who soon left her to speak with a man that she would later come to know as Jason Brown. During their discussion about her property, Ms. Meadows shared that she was not comfortable with the Tiger Connector line going over her only entry/exit and existing electrical line. Jason told her it would take an E5 tornado to bring the transmission line down. Still not comfortable with having such a high-voltage line over her property where she walks daily, and that could block her drive or potentially fall on her existing electrical line, without disclosing that he was part of any routing team for the Tiger Connector, Jason recommended that she indicate on her comment card to have the line go through the outer SW portion of her land where the land on the W and SW of her property intersect. That would change the route from being across her drive and existing electrical line, to being off of her property, or only minimally affecting it for the tree clearing necessary for the easement. Ms. Meadows agreed that was a much better option than the current route and left Jason to go fill out her comment card in the next room.

10. On her way out to the tables in an adjoining area to write down her recommendation for rerouting the line, Ms. Meadows had to walk by someone standing in the

doorway who she did not expect to see. (See Staff Exhibit 201C) Due to her history with this individual, Ms. Meadows became anxious and quickly filled out the card in order to get rush home, causing there to be some minor errors on the comment card and lack of a better explanation about her property situation. Having discussed her concerns with Jason Brown at great length, Ms. Meadows felt confident Jason would share their conversation with someone regarding feedback they had gotten from landowners and the line would undoubtedly be moved to a safer and more suitable area.

11. Having talked in the Spring of 2023 to her County Commissioner, Randy Kliendienst, and discovered the line was still set to go through her property, she was surprised on May 24, 2023 to get a call from Randy indicating that Jason Brown was in his office and she could share her concerns via a conference call. Upon the two realizing they had spoken the previous summer at the public meeting, Ms. Meadows began her campaign to get Jason Brown out to her house to see her place in person so that he could understand how destructive the line would be and still possibly get it moved off of her.

12. Believing he was a good contact with Grain Belt, Ms. Meadows got Jason's phone number from her Commissioner and decided to stay in contact with him regarding protecting her property.

13. During the first part of June 2023, while looking after one of her cats that had fallen ill, Ms. Meadows attempted to watch the PSC hearing for Grain Belt Express to see if they would be granted a permit to built the Tiger Connector. Although she missed a lot of it due to caring for her sick cat, and didn't have time to go back and re-watch several days and many hours of the hearing again, Ms. Meadows stayed in contact with Jason Brown, believing the approval of the route did not mean that the line could still not be moved off of her property.

14. While watching some of the video, Ms. Meadows did hear some people referred to as "intervening", but she had no idea what that meant and missed hearing any testimony, other than announcing they were present. She also heard some groups mentioned throughout the days of hearings, but there were so many witnesses and names mentioned that she was not familiar with, that she had no idea if they were for or against the project.

15. Ms. Meadows did not know until her own complaint was filed in October 2024 and details were released, that Grain Belt had supposedly sent out a letter in August of 2022, giving details on "intervening". Given Ms. Meadows had filled out a comment card with her name, address, and email address, it seems responsible for a company of Grain Belt's size and claimed commitment to treating landowners fair and with respect, that more than the unreliable

postal service would be the only untraceable way that such important information would be sent out to those whose land and possibly life would be so greatly affected by their project. A discovery request would later prove that Grain Belt had no proof that their letter was even delivered to Ms. Meadows. Given how adamant Ms. Meadows has been about not wanting this line through her property, over her drive and existing electrical line, it's absurd to think Ms. Meadows would have knowingly ignored any option she was given to write, call, or attend any meeting or take any opportunity to share why her property should not have the Tiger Connector over and through it. Ms. Meadows has proven her tenacity at fighting to protect herself, her land, and her animals from this line by choosing to represent herself against four experienced attorneys, knowing she is at an extreme disadvantage, but still determined to fight for what she feels so strongly about protecting.

16. During a conversation with Jason Brown on August 4, 2023 that Ms. Meadows took note of on her calendar, writing, "Jason Brown from GBE called. They're waiting on PSC decision before figuring out about moving the line off or less on me.". Ms. Meadows was relieved and happy to learn that moving the line was possible to the SW area of her property she had talked with Jason Brown about at that public meeting back in July 2022. (See Binder, Exhibit 104, Tab J)

17. During the course of this case, Grain Belt has tried to hijack this comment as meaning something completely different than what Ms. Meadows' note said and intended. This note on her calendar referring to the line being moved off her or less on her, refers explicitly to her and Jason Brown's conversation and the subsequent comment card she filled out after their discussion. (See Binder, Exhibit 104, Tab C)

18. During his testimony, Jason corroborated this fact during his testimony from Pg. 145, Lines 18-22 of the Transcript, Item No. 92.

Q. So do you remember our discussion at all at the open house about you recommending me to put on the card about moving the line east [should be corrected to west] of me? Do you remember that conversation at all?

A. I do. We spoke for a long time. Do I remember everything you and I talked about? No.

19. Grain Belt has had to hijack Ms. Meadows notes about the information she was given, including Jason telling her in February of 2024 that the line would start construction at the end of 2024 or first of 2025 despite no EIS completed, no road agreements for the Tiger Connector line

being signed, many easement agreements still unsigned, and no contractor hired to start construction. Most of those details weren't even on the calendar at that time, but yet that's what Mr. Brown told Ms. Meadows and she put on her calendar as a note (Tab J). Jason knew that date wasn't likely feasible, but he still used it as a tactic in March 2024 when Ms. Meadows was still trying to get the line moved off of her property or less on it, to that SW corner where the three property lines converge. When Jason Brown told Ms. Meadows he was waiting until after the PSC decision, because she trusted him, Ms. Meadows thought he was just waiting on the decision to make sure it was even necessary for him to come out, since the permit for the line could be denied.

IV. Conclusion

20. Because Grain Belt Express has no company policy about taking notes regarding conversations it has with landowners, including those concerning safety issues, the PSC must find they breached their Landowner Protocols and grant Ms. Meadows the resolution to have the line moved off of her property to a more reasonable and safe location where she will not have to take on such an unjust burden in the name of public interest. The Missouri Constitution Bill of Rights Section 2 grants her that. The pattern of bad faith conducted by Grain Belt towards Ms. Meadows fundamentally contradicts Grain Belt's public utility mandate. A utility that misleads regulators, ignores safety, and dismisses landowner concerns cannot be said to serve the public interest.

WHEREFORE, Cheri Meadows respectfully requests that the Commission please grant the move of the Tiger Connector line off or less on her property where it will not cause her unjust harm.

Respectfully Submitted,

/s/ Cheri Meadows

Cheri Meadows