

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' REPLY BRIEF

COMES NOW I, Cheri Meadows, (“Ms. Meadows”) respectfully file my reply brief to the Missouri Public Service Commission (“PSC”) regarding Staff of the Missouri Public Service Commission (“Staff”) and Grain Belt Express’s (“Grain Belt”) Initial Briefs:

I. Staff’s Position that Grain Belt did not Violate any Applicable Statutes, Commission Rules, Regulations, Commission Orders, or Commission Decisions is Incorrect

1. In both their Initial Brief and Reply Brief, Staff concluded that Grain Belt did not violate any applicable statutes, Commission rules, regulations, Commission Orders, or Commission decisions. In both cases, Staff failed to recognize and acknowledge that Grain Belt violated the PSC-Ordered and Grain Belt’s own Code of Conduct regarding communications being factually correct, made in good faith, respectful, and reflecting fair dealing.(File No. EA-2023-0017, Item No. 235, Exhibit No. 20, Schedule KC-6). Grain Belt cannot claim that they abide by the Code of Conduct of “fair dealing” or “in good faith” in communications with landowners if they do not take notes and follow up via email or letter regarding a concern or issue that a landowner raises and is seeking a resolution for, as proof that they are complying

with Commission Order #9. (File No. EA-2023-0017, Item No. 287, Report and Order, Pg. 73-74)

2. By not taking any notes or sending any correspondence (including replying to emails) acknowledging the details of the nine phone conversations and in-person meetings that took place over two years from 2022 to 2024, including any internal documentation between departments, Grain Belt has set a very dangerous precedent with how it will handle all landowners if the Commission does not find Grain Belt violated the Code of Conduct. By simply ignoring Ms. Meadows' serious safety concerns with the Tiger Connector going over her drive, the only entry/exit she has to her home and over her existing electrical line, Grain Belt is now able to, and is, claiming there is no proof, other than Ms. Meadows' notes, which Grain Belt has twisted to try to conform to their narrative, that they violated any law, rule, regulation, Commissions Order, or Protocol. This is despite their using misleading tactics, like telling Ms. Meadows, who did not understand the specifics of how the line could or could not be moved, that they were waiting until after the PSC makes a decision before figuring out about moving the line off of her property or less on it. That intentionally misleading statement was intended to take advantage of an unsuspecting landowner who believed Grain Belt was being honest and transparent in their dealings with her, but by that action, prevented her from seeking a resolution sooner from the PSC. Given all that, Staff has still somehow agreed with Grain Belt's claims.

3. While it is incomprehensible how a public utility seeking to build and operate a very high-voltage power line spanning over 800 miles through and around most likely hundreds of residential properties doesn't see the importance of (or legal consequence of not) documenting its interactions with landowners regarding their safety or general concerns and priorities, that is indeed the case. Despite a documentation trail providing an indisputable way of proving to the Commission that Grain Belt is upholding the Commission Order #9 cited above, regarding how they treat the landowners along their route, Grain Belt has decided that not taking any notes

whatsoever better suits how they interact with landowners. Despite it being nearly a year since Ms. Meadows filed her Formal Complaint, Jason Brown acknowledged during his testimony that Grain Belt (still) has no company policy for taking notes, including on safety issues that landowners raise (Transcript, Item No. 92, Pg. 161, Lines 3-21):

Q: [By Ms. Meadows] Is it customary that Grain Belt doesn't make notes on any of its conversations so situations like he said, she said that we're in now?

A: [By Jason Brown] Could I suggest that you ask Jason that question, because I can't speak to every employee that Grain Belt has.

Q: [By Ms. Meadows] Jason who?

A: [By Jason Brown] So just ask me that question that you want to ask me. It's okay. Ask me. If you're asking me if I regularly make notes, that answer is no.

Q: [By Ms. Meadows] I want to know if it's company policy to make notes.

A: [By Jason Brown] There's no company policy.

Q: [By Ms. Meadows] You don't have a policy that whenever a potential landowner gets in contact with you regarding a possible issue or safety issue with their land, you don't take notes and put it in their file or anything? There's no company policy for that?

A: [By Jason Brown] No, there's no policy.....

4. Also during his testimony, Jason Brown admitted that he didn't give Ms. Meadows a business card with this Name, Title, and Contact Information because "You had my cell phone number already." When Ms. Meadows replied that she didn't have Mr. Brown's email or even know what his title was, his reply was "If you had asked me, I would have given that to you.", (Transcript, Item No. 92, Pg. 134, Lines 14-24) indicating that instead of following Section I, Letter h of the Code of Conduct that states "Do provide the landowner with appropriate contact information should additional contacts be necessary.", Mr. Brown left the burden on Ms. Meadows to seek out any additional information like his job title or contact email. The lack of

transparency in providing a contact email with which communication could be documented, seems to be calculated, as Mr. Brown never replied to an email Ms. Meadows sent him on June 17, 2024. Instead, he completely ignored her email (Exhibit 13) and then the following month, attempted to call Ms. Meadows on July 10, 2024.

II. A Review of Grain Belt’s False and Contradictory Statements

5. Grain Belt has consistently said that Ms. Meadows was informed of the approval process numerous times. While that may be true, the approval process has nothing to do with specifics of if and how much the line can be moved. To assume that a landowner with very limited knowledge of the process and legal proceedings is able to go through thousands of pages of documents to find the one or ones that contain the specifics on the micro-siting process or variances allowed, or similar, is a ridiculous and burdensome ask.
6. In their letter dated July 12, 2022, (Exhibit 104, Binder, Tab B) Grain Belt told landowners, “Your input will help us make better decisions as we determine our proposed route for the Missouri Public Service Commission.” Also in the same letter it said, “We know how to build – the right way – treating landowners with respect and fairness.” Both of those sentences conveyed to landowners that Grain Belt genuinely cared about their concerns and would take them into consideration. Both Jason Brown and Kevin Chandler’s testimonies contradict that sentiment, with neither acknowledging spending too much time or resources on the conversations or comment cards that landowners were asked to fill out. That gives weight to Staff’s Cedric Cunigan’s Testimony (Item No. 116, Pg. 2-3, Lines 20 and 1-7)

III. Grain Belt’s Dangerous Priorities When Selecting the Best Route

7. In Schedule AB-2, Pg. 16, Under 2.3 Routing Guidelines, **Section 2.3.1 General Guidelines**, it states:

The following are General Guidelines used for the Project:

- Minimize route length, circuitry, cost, and special design requirements
- Maximize separation distance from or minimize impact on residences

The first two lines disclose Grain Belt's primary goals in routing the Tiger Connector. First is minimizing cost while then minimizing impact to residences. When a public utility like Grain Belt Express builds a transmission line, safety is paramount and should never be considered less important than minimizing cost. The legal and ethical obligations of a utility company dictate that human safety must take precedence over financial considerations, especially in the context of routing through residential property. Ms. Meadows' safety should be placed before any additional cost that Grain Belt may incur in moving the line off of her property where it won't pose such severe risks to Ms. Meadows' health, safety, and property.

IV. Conclusion

8. Ms. Meadows has provided overwhelming evidence of intentional misconduct by Grain Belt on numerous levels, including how her ignorance of the siting specifics for moving the Tiger Connector were used to postpone her from contacting the PSC until the Order had already been issued, while leading her to believe the line could still be moved afterwards. In addition, Ms. Meadows has provided evidence and supporting details of her claims that Jason Brown did not tell her every time they spoke that he could not move the line. In addition, Ms. Meadows has provided ample evidence of the safety and health risks that the Tiger Connector poses to her health, safety, and property.

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