

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 TO GRAIN BELT EXPRESS LLC’S RESPONSE IN  
OPPOSITION TO CHERI MEADOWS’ LATE-FILED EXHIBITS**

COMES NOW I, Cheri Meadows, hereby file this Reply to Grain Belt Express LLC’s Response in Opposition to Cheri Meadows’ Late-Filed Exhibits (“Response”). In support of my Reply, I, Cheri Meadows, state as follows:

**I. The Reason for the Late-Filed Exhibits**

1. On August 19, 2025, as instructed in the procedural schedule, I emailed my intended exhibit list to all of the parties. In trying to comply with the procedural schedule instructions below, I found printing out 10+ copies for all parties for all 25+ exhibits was requiring resources beyond my limited capabilities and what I could afford to hire a professional printer to help me with.

- E. All parties shall bring an adequate number of copies of exhibits that they intend to offer into evidence at the hearing. If an exhibit has not been pre-filed, the party offering it must bring, in addition to the copy for the court reporter, copies for the five Commissioners, the Presiding Judge, and all counsel.

2. On my Exhibit List, there were numerous exhibits that were multiple pages, including the 'Wind Speed Data Recording' (Listed on my email Exhibit List as Exhibit No. 24) that was 33 pages and included over five years worth of local daily wind speeds to give a complete picture of the average wind speed that will be pummeling the Tiger Connector Line running over/through my property. The 'EMF affecting humans - Martin Blank' exhibit (Listed on my email Exhibit List as Exhibit No. 5) is 60 pages. Due to the enormous amount of relevant information in that exhibit, there was no way to condense it to make it into a manageable printed exhibit and with my limited resources, I didn't want to end up printing out a 60 page exhibit I was not allowed to submit due to not having enough copies for all parties, so I decided not to submit it as an exhibit, hoping it would possibly be seen in the file from my previous submission of it. Being unsure if partial exhibits were allowed, I tried to limit them. I was also concerned that not being able to print out the full exhibits would make it appear that I was not being transparent with their inclusion. Below is a reference to my confusion about submitting exhibits during my testimony at the August 20, 2025 hearing. (Transcript, Item No. 92, Page 65, Lines 17-22):

**MS. MEADOWS:**• Actually this will have to be --  
this will have to be -- so I'm sorry. I don't  
understand the process. If I didn't bring enough copies  
for everyone but I have one copy, can I email that to  
everyone? I have it. I just don't have copies of it.  
Is that permitted or how does that work?

3. On September 10, 2025, in response to my email to Judge Clarke regarding an exhibit I'd assigned an exhibit number for to be entered at the hearing, but then forgot to give to the court reporter, along with and some corrections to a few posted hearing exhibit filings in EFIS, I received the following email from Judge Clarke (I have emphasized the word "any" for context):

On Wednesday, September 10th, 2025 at 3:45 PM, Clark, John  
<John.Clark@psc.mo.gov> wrote:

Ms. Meadows,

If exhibit 27 was not filed, you may submit it via EFIS. If you want to submit exhibit 13, you may submit that as well. I believe exhibit 6 and 25 can be switched if they are referencing the wrong exhibit number. Finally, the title of an exhibit is generally determined by the judge, but I have no problem titling exhibit 7 – "Complainant's potential risks to property". However, I would encourage you to submit any unsubmitted exhibits quickly so that I can allow time for other parties to comment or object to the proposed alterations and exhibits.

Judge Clark

Given my uncertainty about exactly how the exhibit process worked, when Judge Clarke said "I would encourage you to submit any unsubmitted exhibits quickly...", I understood it to mean any exhibits that were not submitted during the hearing, not just the ones discussed in my prior email.

## **II. The Relevance of My Exhibits**

4. All of my exhibits are relevant and necessary to refute Grain Belt's claim to the Commissioners during the August, 20, 2025 hearing that, "While Ms. Meadows has articulated many concerns and fears regarding the transmission line, those concerns and fears are her own. She has not shown that those fears and concerns are based on substantial competent evidence." (Transcript, Item No. 92, Pg. 17, Lines 7-11).

5. In my Complaint and throughout my case and hearing, I have alleged that Grain Belt Express' claims that they tried to avoid residences and have minimal impact to land were not true, causing me and my property to have the unjust burden of the unnecessary risk and destruction that would come as a result of that false statement.

6. When questioned at the August 20, 2025 hearing about the purpose of avoiding residences and if it was for safety reasons, Kevin Chandler responded as follows (Transcript, Item No. 92, Pg. 257, Lines 12-22):

Q. **[Ms. Meadows]:** Can you just explain to me real quick what the purpose is of avoiding residences?

A. **[Kevin Chandler]:** I think that's typically self-explanatory.

Q. **[Ms. Meadows]:** Is it more of a safety issue or is there, because it's a finding of fact, so I'm just curious what that actually means, avoiding residences. Is it because of safety, property value, what?

A. **[Kevin Chandler]:** I'm not aware of any particular safety concerns associated with it. I mean, I think just in general landowners prefer that we keep as far away from the residence as is possible.

According to Kevin Chandler's testimony, he's not aware of any particular safety concerns associated with avoiding residences. That was an odd statement given the specific safety concerns I have raised about my residential land not being avoided from the first time I met with Grain Belt Express' Rep, Jason Brown, on July 27, 2022 at the public meeting, to today. As I stated then and have continued to argue and produce supporting evidence for, that by going through my residential property where I live, instead of putting the Line across the road where an open, uninhabited cow pasture sits, Grain Belt Express is jeopardizing my property and safety with their line potentially falling onto my existing electrical line and causing my house to catch on fire or at the very least, blocking my drive, which I have repeatedly explained is the only

entry/exit to my home. Those are both serious safety concerns that if acknowledged by Mr. Chandler, would possibly have avoided this entire case. Instead, Mr. Chandler and those around him have continued to ignore my concerns about the dangers their line poses to me, my animals, and my property. This goes against Mr. Chandler's testimony from File No. EA-2023-0017, Surrebuttal Testimony of Kevin Chandler, Item No. 165, Pg. 19, Lines 13-15, where he stated "...Grain Belt Express is committed to being a good partner with the local community and actively works to address landowner issues when those issues are brought to Grain Belt Express' attention." It's impossible to understand how Mr. Chandler doesn't understand the direct correlation between avoiding residences and avoiding risks to the inhabitants of that residence, especially in cases where the Line goes over an existing electrical line and/or the only entry/exit to the home.

7. The 13 page Testimony of Cedric Cunigan (File No. EA-2023-0017, Staff Exhibit 101, Item No. 242), was submitted as new exhibit Item No. 116, as an exhibit to show in response to Staff being asked if they had any concerns about the route selection, in April 2023, Mr. Cunigan testified that Staff questioned how much weight was given to the different guidelines used in the study and any public comments collected. (Pg. 2-3, Line 20; 1-2). This testimony establishes a pattern of Grain Belt Express purporting to care about landowners and their concerns, while ultimately doing whatever was cheapest or in their best interest. This was also done in their August 12, 2022 public meeting letter that stated, "Your input will help us make decisions as we determine our proposed route for the Missouri Public Service Commission.", (Binder, Exhibit 104, Tab B) and also indicated in File EA-2023-0017, Item No. 232, Schedule AB-2, Route Selection Study, Pg 29, First Paragraph, "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, where feasible, based on new information provided by landowners and technical guidance provided by the engineering team.” Despite all of those repeated claims and seemingly caring attitude about what landowners were concerned about, Grain Belt Express ultimately took my valid safety concerns and recommendation for how to remove all the risks and destruction the line would pose to me and my property while not passing those risks to the adjoining landowner and completely ignored them.

8. My Exhibit 27 that I asked to admit at the hearing on August 20, 2025, then forgot to give to the court reporter, and subsequently contacted Judge Clarke about how to handle, was a letter Gary Jungermann, the Callaway County Presiding Commissioner, wrote to the Public Service Commissioners. In it, Mr. Jungermann shared his interactions with Jason Brown in regards to their discussions about my property. Just like Randy Kleindienst testified at the hearing (Transcript, Item No. 92, Pg. 83, Lines 5-12), Jason Brown never specifically told those gentlemen, as he claimed he told me repeatedly, he could not move the line off of my property (Transcript, Item No. 92, Pg. 155, Lines 17-20). As a matter of fact, Mr. Jungermann stated in his letter that in all of his discussions with Jason Brown, “From those discussions, it was my understanding that Invenergy would consider the possibility of moving these lines and collaborate with Ms. Meadows to ensure that her modest property remains unharmed.”. If Jason Brown had indeed told me every time we talked, which was a total of nine times, that he could not move the line off of my property, he obviously would also have shared that with the County Commissioners who were repeatedly talking to him about moving the line off of my property. It is important that this letter from Gary Jungermann be allowed into evidence because it proves beyond the he said/she said argument that Jason Brown claims he told me repeatedly he couldn’t move the line, yet can provide no email, letter, or documentation of any kind to back up his

claim, while I contend that Jason Brown never told me that until one of our final phone conversations, at which point I asked I asked if I could contact the PSC. As I've claimed from the beginning, Jason Brown misled me and did not act in what the Code of Conduct refers to as 'good faith' regarding our dealings and definitely never told me that the line could not be moved, including on August 4, 2023, when during a phone conversation, I took note on my calendar (Binder, Exhibit 104, Tab J) of Jason telling me that they were waiting on the PSC's decision about figuring out about moving the line off or less on me. That note proves that he never told me the line couldn't be moved off of me once the PSC made their decision and it makes no sense that I would not have objected or reached out to the Attorney General or PSC, as I did after I learned the route was not able to be moved off of my property during the summer of 2024 when I made contact with those parties after actually being told by Jason Brown that the line could not be moved off of my property due to the PSC. Having wanted the line moved off of my property from the first meeting I ever had with Grain Belt Express on July 27, 2022, where I learned the Line was going to go over my drive and existing electrical line, Jason Brown's story is false.

9. The submission of the exhibit titled 'EMF Affecting Humans – Professor Martin Blank (Item No. 111 and Referenced as Exhibit No. 5 on my emailed Exhibit List) is relevant in that it is a testimony that Dr. Blank gave in 2009 regarding his research of EMF's, including those from transmission lines, and their affects on cell biochemistry and cell membrane function. On Page 3/60, Mr. Blank listed his extensive educational and professional background and went on to share how on Page 42/60 that the safety guidelines set by ICNIRP (International Commission on Non-Ionizing Radiation Protection) and IEEE (Institute of Electrical and Electronics Engineers) assumed there were no biological reactions unless heating of cells occurs and are unrelated to biological thresholds. While Aaron White testified during the August 20,

2025 hearing that “..the limits are on your driveway between 50 milligauss and 250 milligauss”, according to Dr. Martin Blank’s research, it only takes 2-12 mG (milligauss) to block the inhibition of breast cancer cells by melatonin. Below is Dr. Blank’s chart from Pg. 43/60 of his testimony:

<b>Biological EM Field Thresholds (power frequency range)</b>		
<b>Reactions:</b>	<b>Na,K-ATPase</b>	<b>2-3mG</b>
	<b>Cytochrome C Oxidase</b>	<b>5-6mG</b>
	<b>BZ (redox) reaction</b>	<b>1-2mG</b>
<b>DNA:</b>	<b>Stress proteins (HL60 Cells)</b>	<b>&lt;8mG</b>
	<b>Stress proteins (Sciara Cells)</b>	<b>&lt;8mG</b>
<b>Cells:</b>	<b>Block inhibition by melatonin</b>	
	<b>(Breast cancer cells)</b>	<b>2-12mG</b>
	<b>Epidemiology threshold (leukemia)</b>	<b>3-4mG</b>

Regarding the Cells and Breast cancer cells category, Dr. Blank said, “The table also has an entry for EMF needed to block the inhibition of breast cancer cell growth by melatonin. That study has been replicated in six labs, and it shows that a low EMF of 12mG blocks the growth-inhibiting action of melatonin on human estrogen receptor-positive, breast cancer cells...”

Dr. Blank also said on Pg. 48/60, “People do not sense these low magnetic fields, so they are believed to be without any health effect. That is not so. There are significant biological effects of EMF on many important cellular systems even at very low fields.” While Dr. Martin passed away in 2018, as of 2009 when he gave this testimony, he had published over 200 papers on EMF, cellular stress response, charge transport enzymes. (Pg. 46/60).

10. My other exhibits regarding EMF and damage to cells, No. 4 and No. 29 (Item No. 117) are both papers that go into the details of how EMF penetrate cells and can cause cellular stress response at low levels that can lead to health issues, including cancer. Without my health, I have nothing. I want to continue to walk safely down my drive with my animals and



take care of maintaining it as it will always need, without worry of what possible unseen harm the EMF is doing to our bodies. These papers, including the testimony from Martin Blank, show how EMF is a very real cause for concern on the cellular level and are relevant to my case and to both my and my animals' health that this Line will jeopardizing by not being routed south of my property where high and prolonged EMF exposure will not pose a risk to anyone.

11. During his testimony at the August 20, 2025 hearing, when I asked Kevin Chandler if any of the numerous concerns I'd raised in my July 12, 2024 email to him (Binder, Exhibit 104, Tab N) gave him any pause, his reply was "No.". When I asked if he looked at any of the links I'd included in my email to him about lines falling, he again replied "No." (Transcript, Item No. 92, Pg. 215-216, Lines 20-25 and 1-21). Also during his testimony, I asked Kevin Chandler if he'd done any studies of extreme weather conditions I've experienced in my area, since Grain Belt Express has been adamant about putting their Line over my only entry/exit to my home and over my existing electrical line. Mr. Chandler's response was consistent with someone who had not done their due diligence on the residential property they intend to run a high-voltage transmission line through. Below is the excerpt from Kevin Chandler's testimony (Transcript, Item No. 92, Pg. 239, Lines 9-18) at the hearing and why all of my exhibits regarding wind, lightning strikes, and tornadoes in the area are relevant to my case and the implications that ignoring them pose to my property and safety.:

**Q. [Cheri Meadows]:** Did you do a study of lightning strikes, ice storms, tornadoes and stuff in this area to confirm that the risk of any of that stuff happening over the course of however many years didn't pose a large enough risk to warrant moving this line?

**A. [Kevin Chandler]:** I don't believe we did. There are

transmission lines throughout this region of the country and they are built and generally engineered and operating safely. So I don't think there's anything unique about this area in terms of those risks.

Grain Belt Express is fine with being reckless with my property and safety by stating, "So I don't think there's anything unique about this area in terms of those risks.", while admitting to not performing any studies to make sure that statement was true before potentially putting a Line across my drive and existing electrical line that could fall and burn my house down, or just block my drive and only entry/exit for an unknown amount of time. My personal experience from over 25 years with nearly year round winds blowing through the corridor of my drive leading to potential faster wear and tear of the components of the Line, and possible line failure, as well as multiple close lightning strikes, coupled with my exhibits supporting those claims, are testaments to my legitimate concerns about my property and safety being jeopardized because this Line was not routed away from a residence. That's especially true in my case where there is the feasible option of moving the line a bit and removing all the risks that a lightning strike or other weather phenomenon would pose to me and my property.

12. This area has experienced at least three documented lightning strikes over the years, with two resulting in fires that destroyed the structures. One lightning strike struck the previous house on the property and burnt it down prior to my current house being built. My witness from the hearing, Randy Kleindienst, testified to hearing about it at the time while working for the county prior to his Commissioner role (Transcript, Item No. 92, Page 89, Lines 5-17). The 2<sup>nd</sup> lightning strike on this property that I witnessed firsthand from the small window on the back of my house was on December 8, 2023 at 12:45am to a very tall tree approximately

25 feet from the back of my house. I heard the bang of thunder/lightning and felt the house shake as I then watched as sparks rained down from the tree in the downpour. This was all documented in my 12-18-24 Response to Grain Belt Express's 12-6-24 Rebuttal, Item No. 12, but that I entered as Exhibit 14 – Lightning Strike Information, Item No. 115. I panned to that exact tree near my house and to the badly mangled tree that still stands near where the previous house was struck by lightning and burned down in my video shown at the August 20, 2025 hearing. Since December is not typically a month known for thunder and lightning, and since I wanted to show evidence of why my concerns about lightning strikes in my area are valid, I submitted proof of the incident to corroborate my story via the lightning strike map. Lightning strikes can cause transmission lines to fall and with at least two incidences of confirmed lightning striking on this property, it is important for the Commissioners to have that information to get a full picture of the dangers that allowing the Tiger Connector to be built over/through my property would pose to me, my safety, and my property. Other lightning strikes could have happened in the vicinity, but due to no other houses, structures, or people on my road, any damage may have gone unnoticed. There was a manufacturing business that burned to the ground from a lightning strike about a mile and a half west of my property, also confirmed by Randy Kleindienst in his testimony regarding the lightning on my property, so lightning strikes in the area are not uncommon.

13. The Exhibit 19 from my emailed Exhibit List of Polsinelli Letter to AG dated July 30, 2024 (Item No. 112), should be admitted into Exhibit because it stands on its own as another testimony to Grain Belt Express' bad faith in regards to how I was treated (breach of the Code of Conduct) and what they claimed to the Attorney General's office and the Commissioners, and what they actually did. In the letter, Grain Belt's Legal Rep, Andrew Schulte, wrote on page 2,

“Grain Belt Express is committed to considering reasonable route proposals from landowners, will respond in writing to reroute requests, and will track and follow through with its obligations to landowners.” I asked repeatedly for nearly two years for the line to be rerouted off of my property and never received any correspondence of any kind from the “committed” Grain Belt Express. In the next paragraph, Mr. Schulte wrote, “While the Route Selection Study sought to minimize impacts on landowners, some impacts are unavoidable.” This is false as well. The way they routed through my mature tree and undergrowth covered property and over my drive and existing electrical line, Grain Belt Express would have a harder time being more impactful to my property. If they truly cared about the impact on me as a landowner, they would have listened to my initial or numerous calls later to have the line moved off of me and remove all the risks and destruction to my land that the Tiger Connector will cause.

### **III. Many of Grain Belt’s Objections were Already Overruled During the Hearing**

14. In their Response, Grain Belt Express brought up objections to exhibits that were already allowed during the hearing by Judge Pridgin.

### **IV. Conclusion**

15. All of the exhibits offered are either previously admitted documents that have substantiated my claims about the impact and dangers to my property that the Tiger Connector Line will pose being routed over my head where I will be forced to live and work under it daily for the next 40-50 years to continue to use and maintain my property as I have for the past 25 years. For the other exhibits offered, they corroborate my claims and testimony about how I, and my local county officials were misled by Grain Belt Express’ Jason Brown about not being able to move the line off of my property, which backs up my claim of Grain Belt Express violating their Code of Conduct.

16. Given the number of risks and impact this line will have on me and my property, it was necessary to have all of the exhibits I had to back up my claims of the danger this line going over/through my property and over my head poses. If this line did not pose so many risks, all of the exhibits would not have been necessary, but out of transparency, I tried to produce evidence that supports everything I have stated since my Formal Complaint.

WHEREFORE, I, Cheri Meadows, respectfully request that the Commission please grant the admission of all of my exhibits to my case.

Respectfully Submitted,

/s/ *Cheri Meadows*

Cheri Meadows