

EXHIBIT 2

11/14/2025

Paul,

Your clients do not have a present right to discovery in this case and Grain Belt Express is under no obligation to respond to these requests.

The Commission rule states: “Discovery may be obtained by the same means and under the same conditions as in civil actions in the circuit court.” 20 CSR 4240-2.090(1). The relevant civil procedure rule states: “Parties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter involved in the pending action.” Rule 56.01(b)(1). There is no pending action before the Commission. Further, the Procedural Order in the case established May 15, 2023 as the final date for discovery in the proceeding. The Report and Order issued on October 12, 2023 is final and appeals of the Report and Order were denied. Grain Belt Express will not provide any further response to these requests.

Thanks,

Andrew Schulte