

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Cheri Meadows,	)	
	)	
Complainant,	)	
	)	Case No. EC-2025-0136
v.	)	
	)	
	)	
Grain Belt Express, LLC,	)	
	)	
Respondent	)	

APPLICATION FOR REHEARING BY CHERI MEADOWS

COMES NOW I, Cheri Meadows, pursuant to RSMo. 386.500 and 20 CSR 4240-2.160, set forth my application for a rehearing in this matter in light of the Commission’s Report and Order issued on October 29, 2025 (the “Report and Order”). For the following reasons, I contend the Report and Order was unlawful, unjust, and unreasonable:

I. Why the Commission’s Decision was Unlawful

1. The Commission erred in excluding from evidence a late-filed letter dated August, 18, 2025 from my Presiding Commissioner, Gary Jungermann, attached as Exhibit 1A. This exhibit was asked to have entered at the hearing and should have been assigned Exhibit No. 27 (Page 65, Lines 11-25 and Page 66, Lines 1-6), but was inadvertently not given to the court reporter. This letter is a key piece of evidence that backs up both my testimony and testimony given by former County Commissioner Randy Kleindienst , who, at the August 20, 2025 hearing, testified that through his multiple conversations with Jason Brown regarding my property, he was under the assumption that Jason Brown could influence the final decision on where the Tiger

Connector Line (“the Line”) was routed, namely off of my property (Page 82, Line 25 through Page 83, Line 12). The letter also shares how Gary Jungermann, through his own discussions with Jason Brown, was under the impression that the line could be moved off of my property. Those County Commissioners’ testimonies are not consistent with Jason Brown’s testimony that he told me every time we spoke that the line could not be moved off my property, while not telling my County Officials the same when they also discussed moving the line off of my property with him.

2. The Commission used the wildly contradictory findings of fact of the Report and Order listed on Page 16, Lines 35-38, as a basis for its decision to not find Grain Belt violated the Code of Conduct via misleading me, while seemingly agreeing with Jason Brown’s berating of me for being confused by the changing versions of reality. Despite his claims with zero evidence to substantiate them, Jason Brown claimed he told me every time we talked that he couldn’t move the line off of me (Transcript, Page 166, Lines 19-25). His testimony to that is contradictory to what he told me back in August 2023 before the PSC made their ruling regarding the Tiger Connector. After our phone conversation on August 4, 2023, I wrote on my calendar, and as shared as Binder, Exhibit 104, Tab J, “Jason Brown from GBE called. They’re waiting on PSC decision before figuring out about moving the line off or less on me.”. If Jason Brown truly understood “the process”, why would he tell me two very different versions of “We’ll wait until the PSC makes a decision before deciding about moving the line off of you” in August of 2023 to the current statement of “When the route was determined by the PSC, I’ve always said that we can’t just move the line off of your property”? Jason Brown knew and testified that getting the Line moved off of my property was my goal from the beginning (Transcript, Page 176, Lines 19-21), so given the overwhelming evidence, he apparently didn’t

even understand the process himself, or he was being dishonest with me during that August 2023 phone conversation so I didn't make any waves with the PSC prior to their ruling. The bigger issue in all of this discrepancy is that the Commission based their decision on Jason Brown's credibility when he had absolutely no proof of any of these so-called conversations about moving the line ever taking place and the evidence completely contradicts him. There is no letter, email, or any other form of correspondence where he indicated to me at any time that we had had those discussions, despite him having numerous opportunities and time to send a letter or an email or even reply to my email to him from June 2024 that he admitted he ignored (Transcript, Page 160, Lines 5-6). On Page 18, Line 51, the Commission found as a finding of fact that on March 28, 2024 when I met with "representatives of Grain Belt", which included Jason Brown, Jordan Connelly, and Greg Smith, "...it was explained that it would not be possible to move the line off of her property because that would introduce a new landowner, which is prohibited by the CCN order⁵⁹." Despite there being three representatives from Invenergy/Grain Belt and CLS (Contract Land Staff) present at that meeting, none of them offered their contact information as part of the Code of Conduct Section I, Line h. "Do provide the landowner with appropriate contact information should additional contacts be necessary," or sent a follow up letter regarding our meeting, the line being moved 94 feet south from its original route after our meeting (per Page 23), or reiterating what was discussed at the meeting to make sure what was discussed was clear to all parties as ordered by the Commission and stated under Section I, Line a. of the 'Grain Belt Express Project Code of Conduct for Right-of Way Agents and Subcontractor Employees that states "Do provide maps and documents necessary to keep the landowner properly informed." Instead, the Commission gave Jason Brown's testimony from undocumented conversations that took place one to three years prior to the August 20, 2025 hearing

unsubstantiated weight, despite his inability to recall the name of his boss from the previous 30 to 60 days from the August 20, 2025 hearing. Meanwhile, the Commission ignored the overwhelming weight of the evidence I presented, which included my testimony and calendar note exhibit showing the deception, the testimony of Randy Kleindienst, and the letter from Gary Jungermann where there was no mention of being told the line couldn't be moved after having met with Jason Brown.

3. The Commission erred in excluding the 60-page late-filed exhibit 'EMF Affecting Humans - Professor Martin Blank' (Item No. 111), whose work was referenced in Exhibit No. 4, 'EMF Article', in which the authors stated in their report dated April 7, 2023, "The concept of EMF and 'cellular stress response' was first mentioned by Martin Blank over a decade ago [5] on the effects of EMF on cell functions." The Martin Blank Exhibit went further into depth of what his decades-long studies of the effect of EMF on cells revealed, including how small milligauss numbers did not equate to no or minimal cell damage. This is important to note, since during his testimony, Aaron White downplayed the EMF numbers of 50 to 250 milligauss that will be present on my driveway, stating that some household appliances would fall within his cited range.

4. The Commission erred in excluding the alternate route map that Commission Chair Hahn referenced during the August 20, 2025 hearing (cite), and Judge Pridgin asked Staff to enter, that shows a safer and more reasonable path of the Tiger Connector Line approximately 600 ft. south of the current line in an open and empty cow pasture where all potentially negative health and safety impacts to me and my property would be completely eliminated.

5. The Commission referenced Section 386.310 RSMo on pages 4 and 19 in the October 29, 2025 Report and Order. Section 386.310 RSMo states, "The commission shall have

power, after a hearing had upon its own motion or upon complaint, by general or special orders, rules or regulations, or otherwise, **to require every person, corporation, municipal gas system and public utility to maintain and operate its line, plant, system, equipment, apparatus, and premises in such manner as to promote and safeguard the health and safety of its employees, customers, and the public..**” (emphasis added). Regarding my health and safety, the Tiger Connector Line being intentionally routed across the only entry/exit to my home and giving me no choice but to walk directly under it daily to continue enjoying my property, maintain my driveway, get my mail, exit or enter my property, while being unnecessarily exposed to EMF and the Line potentially falling on me, in water on my property (cite), or onto my existing electrical line and causing a fire at my home, which as I stated during my testimony (cite), is an earth contact home with extremely limited exits, potentially causing injury or death, does not “promote and safeguard the health and safety” of anyone who lives at, or has a need to enter or exit the property. Myself and all visitors, delivery drivers, contractors, or emergency service personnel will have no safe option to avoid the Line and the EMF it will emit, whether it’s in the air or on the ground and in any way.of anyone who will have to travel or work under the Line, or live in a home that could be so detrimentally affected by a failure of the line. Page 12, Line 16 of the Report and Order proves how dangerous the situation would get if the line were to fall and start a fire at my house and how with no electricity to run my well pump, and no way for help to get down the drive, my life and that of my animals’ and everything I own would be placed in peril. All for a line that never should have been so carelessly routed over the only entry/exit to a residence, especially one with limited exits, and all water options powered by electricity.

6. As I referenced while questioning Kevin Chandler, the Missouri Constitution grants me rights that include being able to enjoy my property. The Missouri Constitution, Article 1, Section 2 states, “All persons have a natural right to life, liberty, the pursuit of happiness and the enjoyment of the gains of their own industry;... to give security to these things is the principal office of government, and... when government does not confer this security, it fails in its chief design.”. The Commission’s decision is unlawful in that I am being deprived of my right to enjoy my property by making it an unavoidable danger.

II. Why the Commission’s Decision was Unjust

7. It is unjust that the Commission chose to ignore the overwhelming weight of the evidence that I provided showing everything I had a concern with was backed by hard evidence, while Jason Brown’s testimony was given more weight without any evidence to back any of it up. On the contrary, my evidence proved that he intentionally misled me (see Exhibit calendar),

8. It is unjust that the Commission heard my testimony, saw my exhibits, and those of Grain Belt that included their public meeting announcement letter they sent to me on July 12, 2022 that said, “Your input will help us make better decisions as we determine our proposed route for the Missouri Public Service Commission.” (Exhibit 104, Tab B), to which I attended and voiced my concerns at length to Jason Brown about the line going over my only entry/exit and my existing electrical line, as well as left a comment card indicating how simple it would be to move the line SW of my property. During testimony, both Jason Brown and Kevin Chandler testified that my comment card was ignored (cite), emails I sent were ignored (cite), and links that I’d supplied that proved that transmission lines do sometimes just fall for no apparent reason, were not clicked on. (cite) = that a better took my testimony, which included me going to the first public meeting I was aware of in July 2022 in Fulton, MO after learning that my land

had been targeted by the Tiger Connector Line all of my evidence, and following the protocol in their letter that stated “Your input will help us make better decisions as we determine our proposed route for the Missouri Public Service Commission.” (Exhibit 104, Tab B) the fact that my home is the only residence on a one-mile stretch of road, and only 400 ft. wide at the very widest point, and was easily avoidable

9. On Page 9, Line 6, under General Findings of Fact in the Report and Order, it states, “Grain Belt’s transmission route cuts across Meadows’ property at the southern end near where her driveway meets County Road 260 at the southern edge of her property.” That statement is grossly incorrect. In actuality, the line cuts diagonally across my property at near the road at the SE corner, following a NW trajectory, crossing at nearly the half way point of my drive between my house and the road. Without the Commission able to seemingly understand where this Line will cross my property and drive that I walk daily and have to maintain year around, and the amount of property that will be affected, the decision to deny my complaint is unjust. As I indicated in my testimony (cite), this giant 200 ft. opening from NW to SE along with the current S to N opening I already have for my drive, will leave me with year round wind to contend with to walk my animals, get my mail, and maintain my drive.

10. The Commission appears to have given weight to Grain Belt’s statement on Page 11, Line 13, that in response to my complaints, they moved the line 94 feet further from my residence. When looking at a map of my property, it is easy to see that moving the line any amount up or down my drive, does absolutely nothing to remove the risk of the line falling across my drive, onto my existing electrical line, into water in the ditches, or exposing me and my animals to EMF every time we take our daily walk, I work on maintaining my driveway, or I walk to the road to retrieve my mail from my mailbox.

11. On Page 12, Line 17, the Commission outlined most of the potential risks I cited in my Exhibit No. 7 that are associated with the Tiger Connector Line being run over/through my property. There were three left off the list of 12 mentioned. One that was missed was my concern about if my wireless driveway alarm would still work. I also indicated my concern for the corona noise that I understand these lines emit and how that might affect my ability to hear the cry/meow/bark of a lost or injured animal. Since I am an animal rescuer with multiple cats and dogs, and as the Commission noted on Page 21, the safety of my animals is very important to me, making this is a very real and serious concern, as well as the third missed risk, my ability to safely fly my drone over and around the transmission line that cuts diagonally across my property, in order to look for missing pets on or near the road. On line l., Loss of privacy due to removed trees was only listed, when another big issue that was left off, is that with such a large swath of land being opened up is the windbreak that it currently provides, being lost forever, making winter and early Spring walks, very windy and extremely cold. These 15 risks are all very real and would individually or combined, have a very negative effect on my use and enjoyment of my property. The Commission's decision to disregard these risks so some trees in the middle of a neighboring property aren't cut down, or the neighbors a half a mile away don't have the line a little bit closer to the backs of their houses, while still being closer to mine, is not only unjust, but it is also unfair that I have to make so many sacrifices and take so many risks when my property can so easily be avoided by routing the line slightly south of my property where nobody will have to endure any risks from this Line. Line a, which addressed the risk of the transmission line falling failed to address the nine links I found and referenced in my formal complaint addendum as well as in my December 5, 2024 rebuttal. My concerns with the Line as well as the nine instances of lines falling links were also sent to Kevin Chandler on July 12, 2024

in an email (Exhibit 104, Tab N), which he admitted during testimony didn't give him pause and that he didn't click on any of the links, nor respond to me. (cite)

12. It is unjust of the Commission to give weight to someone who will not suffer any consequences from this Line or any ill effects from it, based on their testimony that it is "unlikely" that the transmission line would cause my house to catch on fire. (cite) Accidents happen in seemingly safe situations all the time and history is full of cases of them. Legally, situations like this are known as foreseeability. There is a foreseeable risk with this line being placed over my existing electrical line, drive, and where I will work and walk every day. For the Commission to listen to one person's opinion on the safety of this Line is an egregious error in their duty to protect the public. While the Commission noted "The design standards used for high voltage and extra high voltage are extremely stringent.", that does not account for a part failure, lack of maintenance, or human error. With such a possibly catastrophic outcome ***IF*** something were to ever go wrong, it is unjust and unfair to expect me to take on all of the burdens from this line and it's possible failure when there are at least two other route options available (to the North of my house (cite) or to the South of my property, cite) that would place this line out of harm's way of any residence or its inhabitants.

13. It is unjust that the Commission gave Aaron White so much credibility with his statements that Invenenergy designs its transmission lines above minimum required standards (cite) and that there are design standards for an extreme weather wind event (cite), without getting any specific details as to how exactly Invenenergy goes above and beyond the minimum required standards and how their design standards are done to ensure extreme wind doesn't bring their line down. It was just assumed by the Commission that all of this is true without any evidence or explanation. When it comes to safety parameters for something as important as a high-voltage

power line being placed in a location that could have catastrophic and deadly ramifications if something went wrong anywhere along the line with the design, manufacturing of parts, and/or construction of it, it seems imperative to know exactly what steps have been taken to mitigate all risks to anyone who will have to bear the brunt of the failure if anything goes wrong.

14. On Page 14, Line 25, the Commission unjustly found as a finding of fact that “In the event of abnormal or fault conditions the controls and equipment are designed to deenergize the line in approximately a tenth of a second.³²” The Commission appears to take this as an absolute fact as if the line were running across an empty field where little harm would be caused if the controls or equipment failed, as opposed to over a residential property with an existing electrical line, one entry/exit that sits directly below the line, and occasional standing water in the vicinity of the line. The ramifications of a failure in the controls or equipment would be much more severe than if the controls or equipment failed across a field. If Invenergy/Grain Belt was so confident in their controls and equipment, they wouldn’t be so averse to siting their line near the small pond across the road, and the fact that that puts the line closer to water than they like***verify (cite) which unlike my property, would have minimal impact if the line didn’t shut off as designed to in the event of a failure.

15. During his testimony, Aaron White testified that his educational background was _____. (cite) He also testified that the EMF limits on my driveway are between 50 milligauss and 250 milligauss. (cite) and that some household appliances, such as a microwave, a vacuum cleaner, and a hairdryer would fall within that range. (cite). The Commission was unjust in accepting Mr. White’s testimony as fact that the numbers would be between the 50 and 250 as he testified without giving any additional information or evidence to substantiate that claim. Mr. White also did not indicate that he has a background in a field that would qualify him to be given

“expert” status about the safety of EMF or where is knowledge about their levels come from. The Commission also did not consider the fact that while appliances such as a microwave, a vacuum cleaner, and a hairdryer *may* fall within the 50 and 250 mG range, I can choose to own and/or use them, in determining if I want to be exposed to the possible EMF that they emit. With the Tiger Connector Line, I have absolutely no choice in the matter of not wanting to be exposed to the high levels of EMF that it will emit. This line will traverse the only section of my property that is suitable to safely walk year-round with my animals where as I testified, we can have a break from EMF. (cite) If the line is not moved off of my property or at least not placed across my drive, my only option to get exercise and enjoy nature with my animals without being exposed to unwanted EMF will be to restrict my walks to about half of my driveway, or just stay in my yard. Trying to use other areas of my property with no well established path will put me and my animals at risk of potentially deadly tick exposure that I am not willing to subject myself or my animals to. That is an excessive burden that should not be allowed and it is unreasonable for the Commission to expect someone who values their and their pets’ health and safety and has read the research on EMF and drawn their own conclusions on its safety, to give up the right to enjoy their own property, just to remain safe and healthy.

III. Why the Commission’s Decision was Unreasonable

16. Grain Belt Express, LLC has the ability to build the Tiger Connector Line without infringing upon my health and safety by simply following their Finding of Fact (cite) from the October 12th, 2023 Report and Order that indicated they would avoid residences

17. The Commission’s decision to give weight to Grain Belt’s claim on Page 10, Line 10, that their routing team was restricted by properties to the west and south of my property due

to structures is unreasonable in that during Kevin Chandler's testimony, he indicated that moving the line to accommodate the line being moved off of me, would still keep the line closer to my house (cite), while just moving it a bit closer to the backs of the two existing houses and structures one half mile away on County Road 231. The fact that the line would be out in a cow pasture behind their houses that the homeowners are seldom in, while avoiding having to run the Line over my existing electrical line and over my only entry/exit, while having to destroy nearly two acres of mature trees, wildlife habitat, that also serves as a windbreak and privacy screen, while allowing me to continue to safely walk up and down my drive daily, as well as maintain it without worry of daily decades-long EMF exposure. It is also unreasonable that any weight is given to mentions of additional trees being removed, when the additional trees removed will be offset by the trees that are kept intact on my land and the fact that my life, health, and safety won't be compromised by this Line being over and through my property.

18. It is unreasonable of the Commission to believe that after attending the July 27, 2022 public meeting in Fulton, MO where Jason Brown and I discussed at length my displeasure with the line going across my property, and filling out a comment card (Exhibit 104, Tab C) that indicated I was "vehemently" against the line and would be "contacting every possible resource available" to stop it, that I would ignore the August 18, 2022 letter that Grain Belt alleges they mailed to me, without proof of receipt, and not contact the Missouri PSC or Office of Public Counsel as instructed, to inquire how the line was going to be allowed to jeopardize my safety with so much open, resident-free land all around me that would be a safer and less destructive route.

19. It is unreasonable that on Page 21 and 22 under their decision, the Commission concluded, "Most of the safety risks that Meadows is concerned about involve a downed line

blocking her driveway or hitting her existing rural electric cooperative overhead line. She is concerned that her house would catch fire if the Grain Belt transmission line fell. However, Meadows' concerns, while genuine, are not reasonable." As I pointed out during the hearing (cite), and was corroborated by Randy Kleindienst (cite), there have been at least three lightning strikes in my area, two of which were very serious, resulting in a nearby business as well as the house that previously sat on my property, being struck by lightning and completely destroyed by fire. As I also testified at the August 20, 2025 hearing, I witnessed a very tall tree directly behind my house be struck by lightning in December of 2023 (cite). While it's a matter of opinion about what is considered reasonable, a reasonable person would be nervous to have that much serious lightning activity and damage in the vicinity of high voltage power lines on 140 ft. tall towers run across their existing electrical line that could potentially result in a fire at their very rural house, with only a volunteer fire department to rely on, if the drive is even capable of being used. The Commission refers to White's testimony about the line de-energizing in a tenth of a second and the unlikelihood that the transmission line would cause a fire and while there is risk, "that risk is negligible." As the resident that will have to constantly worry for the next 40-50 years about the truth of Mr. White's statements and his confidence in the Tiger Connector Line's design, construction, numerous critical parts remaining in perfect working order, and an excellent maintenance schedule with no excessive freak nature occurrences, I feel it is normal and reasonable for someone to be uneasy about the Line being placed in a location where if things go wrong, very bad things would most likely happen. This is again why Grain Belt has a duty of care to put the line across the road, where the risk of a catastrophic accident would not have the possibly deadly outcome that it could have by being placed across my drive and existing electrical line.

IV. New Evidence That Should Be Considered

20. On November 20, 2025 I went to the home of Don and Loi Lehenbauer who are co-owners of the 80 acre property S/SW of my property. Don was not available, but Loi and I spoke at length about my situation and she indicated that she didn't have a problem with the line being moved onto them, but that she would have to speak with her husband, Don, and his sister, who also own the land. On November 23, 2025, I returned to Don and Loi's house to see if Loi had had a chance to speak to her husband Don about the Line. She had briefly discussed it and said he would need to talk to his sister, but that he'd been very busy with his business. Upon explaining to her that I needed to have an answer to give to the Public Service Commission this week, she replied to "have them call me/us". From what I gathered, these landowners would be open to taking the line if they had more details, which I was not able to provide since Grain Belt never supplied an alternative route map that would indicate any of the details such as amount of land affected, turning structure location, etc.

WHEREFORE, for the reasons set forth above, I respectfully request the Commission grant me a rehearing pursuant to Section 386.500, RSMo.

Respectfully Submitted,

/s/ Cheri Meadows

Cheri Meadows

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email this 27th day of November, 2025.

s/ *Cheri Meadows*
Cheri Meadows