

EXHIBIT 2

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, and)
Eastern Missouri Landowners Alliance)
DBA Show Me Concerned Landowners, and)
John G. Hobbs,)
)
Complainants,)
)
V.)
)
Grain Belt Express LLC, and)
Invenergy Transmission LLC)
)
Respondents)

Case No. EC-2021-0059

**RESPONSES TO COMPLAINANTS' SECOND SET OF REQUESTS FOR
ADMISSIONS TO RESPONDENTS**

Respondents hereby serve their responses to Complainants second set of requests for admissions:

1. The three-page document accompanying this Request for Admissions, marked as Exhibit A, is a true and accurate copy of a two-page letter dated December 8, 2020 and the one-page attachment thereto, which were sent to a Missouri landowner by Grain Belt Express or by an agent of Grain Belt Express.

RESPONSE: Admit.

2. Letters substantially similar to the letter at Exhibit A were sent to other landowners in Missouri by Grain Belt Express or by an agent of Grain Belt Express.

RESPONSE: Admit.

3. As of January 14, 2021, the Grain Belt Express website (www.grainbeltexpress.com) included the statements quoted in subparagraphs a-e below, or statements substantially the same as those quoted there:

a. Starting at the home page, under the tab for Missouri: “Up to 2,500 MW of low-cost clean energy delivered to Missouri and Kansas customers, including delivery to 39 municipal utilities across Missouri.”

b. Starting at the home page, under the tab for Missouri: “Up to \$7 billion in electricity cost savings for as many as 2.4 million Kansas and Missouri residents.”

c. Starting at the home page, under the tab for Missouri: “Broadband infrastructure for rural communities along the line route.”

d. Starting at the home page, under the tab for Kansas: “Up to 2,500 MW of low-cost clean energy delivered to Kansas and Missouri customers.”

e. Starting at the home page, under the tab for Illinois: “Grain Belt Express does not have a pending or proposed regulatory filing in Illinois and is evaluating options for the project in the state.”

RESPONSE: Respondents admit that the information on the Grain Belt Express website as of January 14, 2021 is either accurately quoted in each subparagraph a-e above or substantially similar to each subparagraph a-e above.

4. As of January 18, 2021, the statements quoted in items 3a and 3b above had been removed from the tab for “Missouri.”

RESPONSE: Admit. As part of Invenergy Transmission’s regular review of the Grain Belt website, some of the information on the website was rearranged as of January 15, 2021, prior to receiving Complainants’ First Set of Requests for Admissions.¹

¹ On January 21, 2021, Complainants withdrew its January 19, 2021 First Set of Requests for Admissions, and substituted the same with the Second Set of Requests for Admissions.

5. As of January 18, 2021, Item 3c above had been revised to read substantially as follows: “Potential to install optic fiber along entire length of line to expand rural broadband infrastructure.”

RESPONSE: Admit. As part of Invenenergy Transmission’s regular review of the Grain Belt website, some of the information on the website was rearranged as of January 15, 2021, prior to receiving Complainants’ First Set of Requests for Admissions.

6. As of January 18, 2021, the statements quoted in items 3d and 3e above remained unchanged from the statements as they appeared on January 14, 2021.

RESPONSE: Admit.

Respectfully submitted,

/s/ Andrew O. Schulte

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ATTORNEYS FOR RESPONDENTS

VERIFICATION OF RESPONSES

The answers provided to the foregoing Data Requests have been collected from various sources at Invenegy Transmission LLC and Grain Belt Express LLC, and are true and accurate to the best of my knowledge and belief.

Signed: /s/ Eric Miller
Eric Miller
Vice President
Invenegy Transmission

Dated: February 2, 2021

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 2nd day of February, 2021.

/s/ Andrew O. Schulte
Attorney for Respondents

EXHIBIT A



Grain Belt Express

An INVENERGY TRANSMISSION Project

MO-MO-028.000

December 08, 2020

AMKO, L.L.C.
17234 Route M
Madison, MO 65263

Subject: Grain Belt Express Landowner Update

Dear AMKO, L.L.C.,

You are receiving this letter in order to provide you with project information and updates regarding the Grain Belt Express transmission line project.

Increased Local Delivery to Kansas and Missouri

As you may be aware from recent news, Grain Belt Express has announced a proposed plan to increase the project's delivery capacity for Kansas and Missouri consumers. For many years before Invenergy Transmission acquired the project, local stakeholders called for more of Grain Belt's power to be delivered locally. This plan makes sense as demand for clean energy has grown in Kansas and Missouri. For the first time, this would open the option for Kansans to benefit from energy produced in-state, and in Missouri, it would expand access beyond the 39 communities across the state that are already contracted to receive service from the line.

Under this plan, up to 2,500 megawatts of Grain Belt's 4,000-megawatt capacity would be delivered to Kansas and Missouri consumers, who would see up to \$7 billion in energy cost savings over 20 years. This requires expanding the already-approved converter station in northeast Missouri, which would double the overall economic investment in Missouri to approximately \$1 billion.

Grain Belt Express will be seeking regulatory approval for this plan, which would also allow for project construction to proceed prior to approval in Illinois. In the meantime, as the proposed changes do not affect the approved route, project development activities are proceeding based on existing regulatory approvals.

Additional Landowner Compensation from Use of Lattice Steel Structures

We've recently received questions related to transmission structure types that will be used for this project. In Kansas and Missouri, Grain Belt has moved from monopole to steel lattice structures, resulting in more compensation for landowners per structure. Landowners will receive \$18,000 for each lattice tower, as compared to \$6,000 for each monopole, based on payment levels approved by regulators.

Structures will typically range from 130 to 160 feet tall, with exact heights depending on several variables, including engineering requirements, topography, and span length. We anticipate approximately four structures per mile and tower footprints of roughly 40 feet by 40 feet. Landowners will still be able to operate, plant, harvest, hunt, and engage in many more activities around the structures and the line. Please see the attached visualization as a reference.



Grain Belt Express

An INVENERGY TRANSMISSION Project

MO-MO-028.000

Ongoing Landowner Discussions and Input on Facility Design

Grain Belt Express, along with its land partner, Contract Land Staff (“CLS”), is in active dialogue with landowners along the route as our team continues to sign voluntary easements in Kansas and Missouri. Thank you to those who have signed agreements to date. We value open conversations with landowners and landowners’ attorneys to provide timely, accurate, and useful information that will allow you to make the best decisions regarding your land. We recognize that structure placements are an important part of these decisions. Preliminary structure locations have now been prepared and are being reviewed by CLS with landowners in three Missouri counties. Preliminary structure locations for other counties along the route are being prepared and will be shared with landowners when available.

Our goal is to secure all easements voluntarily and to make informed facility design decisions related to your property. That is possible only with open communication. If we have attempted to contact you and we have not yet reached you or your legal representative, please contact your CLS representative at your earliest convenience. Their name and contact information is provided below:

Alexander Brown
(636) 387-2199

alex.brown@contractlandstaff.com

Positive Energy: Pass it Along

Finally, 2020 has brought some significant challenges to the world. We believe that Positive Energy is needed now more than ever. Grain Belt will bring affordable power for families and businesses, jobs for workers, and local investment in school districts, and public services – that’s positive energy. With everything going on in 2020, we want to pass along positive energy to you, and hope you do the same. These days we all need it.

For more information about the project visit the project website at www.GrainBeltExpress.com and Follow us on Facebook at <https://www.facebook.com/GrainBeltExpress>.

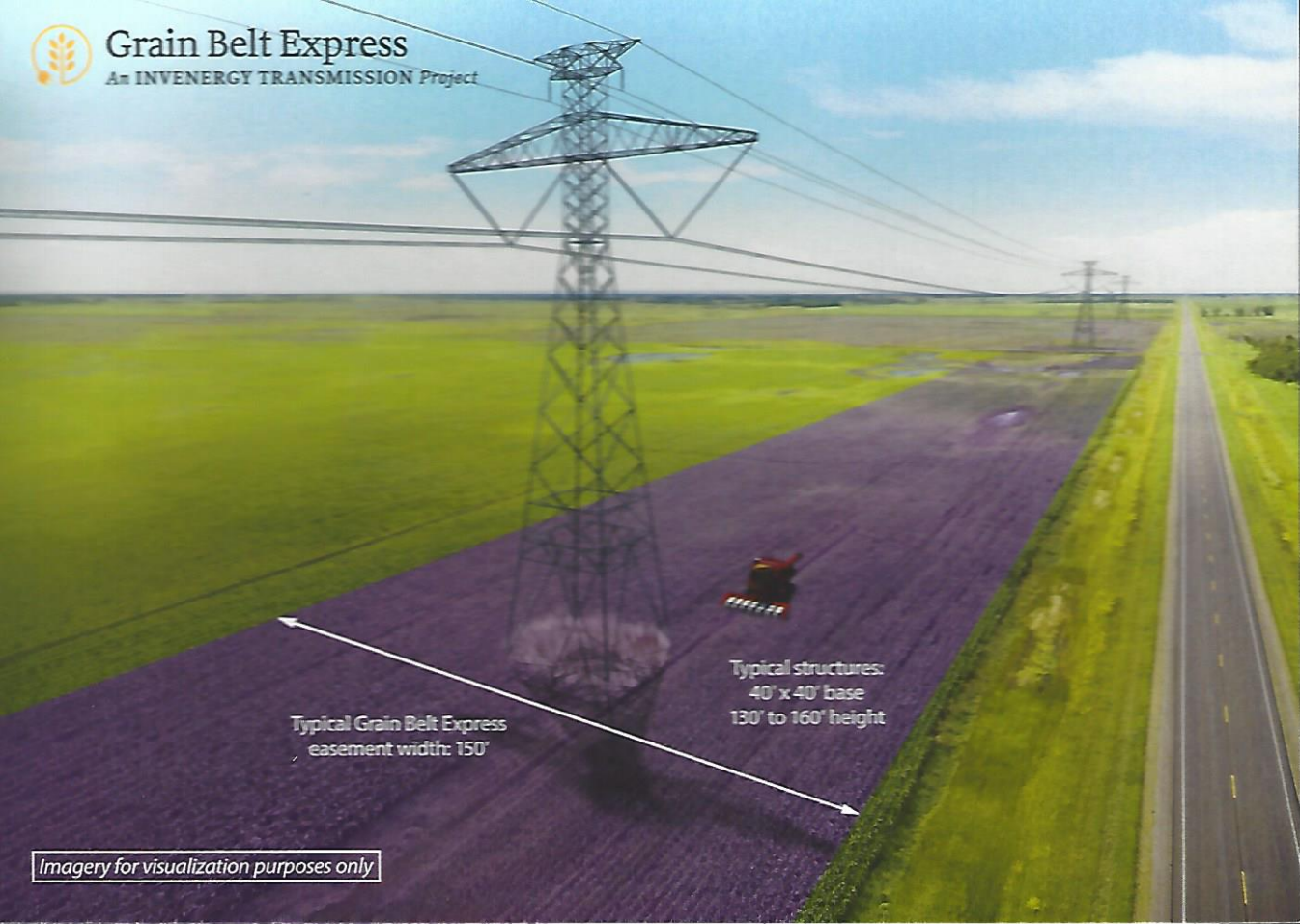
Sincerely,

Eric Miller
Vice President
Invenergy Transmission



Grain Belt Express

An INVERENERGY TRANSMISSION Project



Typical Grain Belt Express
easement width: 150'

Typical structures:
40' x 40' base
130' to 160' height

Imagery for visualization purposes only