

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt Express)
Clean Line LLC for a Certificate of Convenience and)
Necessity Authorizing it to Construct, Own, Operate,)
Control, Manage, and Maintain a High Voltage, Direct) Case No. EA-2016-0358
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

MOTION OF GRAIN BELT EXPRESS TO ADD DR. WILLIAM H. BAILEY
TO THE ORDER DIRECTING FILING REGARDING WAIVER OF CERTAIN WITNESSES

Grain Belt Express Clean Line LLC (“Grain Belt Express”) moves to add the name of Dr. William H. Bailey to the list of witnesses set forth in the Commission’s Order Directing Filing of March 15, 2017, which addressed Staff’s Waiver of Appearance of Certain Witnesses. Staff’s waiver pleading stated that all parties in this case, except for the Missouri Retailers Association and the Missouri AFL-CIO, have waived their right to examine such witnesses and have stipulated to the admission of the witnesses’ pre-filed testimony.

In support of this motion, Grain Belt Express states the following:

1. Grain Belt Express has been advised by the Staff and by all other parties to this case, including counsel for the Missouri AFL-CIO¹ -- except for the Missouri Retailers Association -- that they will waive their right to cross-examine Grain Belt Express witness Dr. Bailey and will stipulate to the admission of his pre-filed direct testimony.

2. Assuming that no member of the Commission has any questions for Dr. Bailey, Grain Belt Express respectfully requests that Dr. Bailey’s name be added to the Commission’s Order Directing Filing, with the hope that he may be excused from appearing at the hearing of this matter which commences March 20, 2017.

¹ Undersigned counsel and counsel for the Missouri AFL-CIO conferred by email and by telephone on March 15, 2017.

WHEREFORE, Grain Belt Express requests that the name of Dr. William H. Bailey, witness for Grain Belt Express, be added to the Order Directing Filing.

Respectfully submitted,

/s/ Karl Zobrist

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**ATTORNEYS FOR GRAIN BELT EXPRESS
CLEAN LINE LLC**

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 16th day of March 2017.

/s/ Karl Zobrist

Attorney for Grain Belt Express Clean Line LLC