## **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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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 Current Transmission Line and an Associated Converter Station Providing an interconnection on the Maywood -Montgomery 345 kV Transmission Line

Case No. EA-2014-0207

## MATTHEW AND CHRISTINA REICHERT'S MOTION TO ACCEPT CORRECTED FILING

Matthew and Christina Reichert (Reicherts) file this Motion to Accept Corrected Filing

through their Attorney, Gary Drag. The following facts apply to this Motion:

1. On, June 18, 2014, The Missouri Public Service Commission (PSC) issued its

Order Setting Procedural Schedule and Other Procedural Requirements.

2. The Order required that all Rebuttal Testimony be submitted by September 15,

2014.

- 3. The Reicherts received personal electronic service of the Order.
- 4. I, Gary Drag, filed the following on September 15:

Rebuttal Testimony of Christina Reichert;

Rebuttal Testimony of Boyd L. Harris;

Rebuttal Testimony of Christina Umbriaco; and

Rebuttal Testimony of Scott Nordstrom.

5. I made an administrative error and filed a draft, unsigned version of Boyd L.

Harris' Testimony.

6. It had been decided during the day on September 15 not to use this version to ensure compliance with copyright laws.

7. I filed the correct Testimony for Mr. Harris within 48 minutes of the original incorrect filing after discovering the mistake.

8. The correct Testimony was filed at 12:44 a.m. on September 16.

9. Excluding the correct Testimony would adversely effect the Reicherts' position.

10. None of the other Parties to this case will be placed at a disadvantage by allowing the corrected filing.

11. The Schedules for the Rebuttal Testimony of Christina Reichert were filed separate from the Testimony.

12. The Schedules were filed approximately 6 minutes late at 12:06 a.m..

13. The Schedules are useful but not required for the Reicherts' position.

14. None of the other Parties to this case will be placed at a disadvantage by allowing the Schedules.

15. I am representing the Reicherts on a pro bono basis.

16. This is my first case before the PSC.

Therefore, I respectfully request that the PSC accept the corrected filing for the Rebuttal Testimony of Boyd L. Harris and accept the Schedules for the Rebuttal Testimony of Christina Reichert.

Respectfully submitted, Law Office of Gary Drag

/s/ Gary Drag

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## **CERTIFICATE OF SERVICE**

I certify that true and accurate copies of this Motion were sent by e-mail on September

16, 2014, to all parties on the official service list for this case.

/s/ Gary Drag

Gary Drag, MBN 59597 Attorney for Matthew and Christina Reichert