BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri Landowners Alliance,)	
	C 1:)	
	Complainant,)	
)	
V.)	Case No.
)	
)	EC-2014-0251
Grain Belt Express Clean Line LLC,)	
Grain Belt Express Holding LLC, and	h)	
Clean Line Energy Partners LLC,)	
)	
	Respondents.)	

JOINT MOTION OF RESPONDENTS AND STAFF TO POSTPONE PREHEARING CONFERENCE AND MOTION OF RESPONDENTS TO DELAY PREHEARING CONFERENCE

Respondents Grain Belt Express Clean Line LLC, Grain Belt Express Holding LLC, and Clean Line Energy Partners LLC ("Respondents"), and the Staff of the Missouri Public Service Commission Staff ("Staff") jointly move to postpone the prehearing conference ordered by the Commission on April 29, 2014. Respondents additionally move that the prehearing conference be deferred until such time as the Commission rules on their Motion to Dismiss.

In support of their Motion, Respondents and Staff state as follows:

1. Complainant Missouri Landowners Alliance ("MLA") filed a formal complaint regarding the Respondents' website and certain public statements that they have made on March 11, 2014, alleging that they violate Sections (12) and (14) of the Commission's Ex Parte Rules, 4 CSR 240-4.020.

- 2. The Respondents filed their Motion to Dismiss the complaint on April 14, 2014. MLA opposed the Motion to Dismiss by filing an "Answer" on April 16, and Respondents replied on April 25.
- 3. Pursuant to the Commission's Order Directing Filing, Staff responded to the complaint on April 28, 2014.
- 4. The Commission thereafter issued on April 29 an Order Setting Prehearing Conference, which scheduled a conference to occur on May 14 at 1 p.m.
- 5. Counsel for both the Respondents and for Staff have unavoidable conflicts on May 14, 2014. Therefore, Respondents and Staff request that the prehearing conference be rescheduled to May 19, 21, 22 or 23, 2014.
- 6. Respondents believe that a prehearing conference is premature and not warranted at this time, given the pending dispositive Motion to Dismiss that awaits the Commission's ruling. If there is no legal basis to support MLA's complaint and the Motion to Dismiss is granted, there will be no need for such a conference. Therefore, Respondents request that the prehearing conference set for May 14 be deferred and that the parties await the Commission's ruling on the Motion to Dismiss. Staff does not oppose Respondents' request, but does not join in it.

WHEREFORE, Respondents and Staff move the Commission to reschedule the prehearing conference to May 19, 21, 22 or 23, 2014, and Respondents additionally move to defer the prehearing conference until such time as the Commission has fully considered and ruled upon Respondents' Motion to Dismiss.

Respectfully submitted,

/s/ Karl Zobrist

Karl Zobrist MBN 28325
Lisa A. Gilbreath MBN 62271
Andrew Zellers MBN 57884
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
(816) 460-2400
(816) 531-7545 (fax)
karl.zobrist@dentons.com
lisa.gilbreath@dentons.com
andy.zellers@dentons.com

Cary J. Kottler
General Counsel
Erin Szalkowski
Corporate Counsel
Clean Line Energy Partners LLC
1001 McKinney Street, Suite 700
Houston, TX 77002
(832) 319-6320
ckottler@cleanlineenergy.com
eszalkowski@cleanlineenergy.com

Attorneys for Respondents

/s/ Nathan Williams

Nathan Williams MBN 35512 Deputy Counsel Missouri Public Service Commission 200 Madison Street, PO Box 360 Jefferson City, MO 65102-0360 (573) 751-8702 nathan.williams@psc.mo.gov

Attorney for Staff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Postpone Prehearing Conference was served upon the parties to this Complaint by email or U.S. Mail, postage prepaid, this 1st day of May, 2014.

/s/ Karl Zobrist
Attorney for Respondents