## **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 EXCUSE CHRISTINA UMBRIACO AND SCOTT NORDSTROM FROM THE EVIDENTIARY HEARING

Matthew and Christina Reichert (Reicherts) file this Motion to Excuse Mrs. Christina

Umbriaco and Mr. Scott Nordstrom from the evidentiary hearing. The Reicherts state the following:

1. On September 15, 2014, Mrs. Umbriaco filed Rebuttal Testimony in support of

Matthew and Christina Reichert.

2. On September 15, 2014, Mr. Nordstrom filed Rebuttal Testimony in support of Matthew and Christina Reichert.

3. Mrs. Umbriaco and Mr. Nordstrom are scheduled to testify on November 21.

4. The other parties in this case have either waived cross examination of Mrs.

Umbriaco and Mr. Nordstrom or have waived cross examination contingent on all other parties waiving cross examination.

5. Grain Belt Express Clean Line LLC (GBE) has reserved the right to object to the admission of their Rebuttal Testimonies.

- 6. Mrs. Umbriaco will be approximately 8.5 months pregnant by mid-November.
- 7. Mr. Nordstrom lives and works in Omaha, Nebraska.

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8. Travel for both Mrs. Umbriaco and Mr. Nordstrom would impose a substantial hardship on them.

9. All of the parties have had the opportunity to review the Rebuttal Testimonies and work papers of Mrs. Umbriaco and Mr. Nordstrom.

10. All of the parties have had the opportunity to issue Data Requests related to those Rebuttal Testimonies and review the responses to those Data Requests.

None of the parties would be prejudiced by excusing Mrs. Umbriaco and Mr.
Nordstrom from the evidentiary hearing.

Therefore, the Reicherts respectfully request that the Missouri Public Service Commission (PSC) excuse Mrs. Umbriaco and Mr. Nordstrom from the evidentiary hearing and admit their testimony contingent on any objection of admissibility by GBE or other parties. If the PSC does not grant this request, the Reicherts respectfully request that the PSC allow Mrs. Umbriaco and Mr. Nordstrom to testify by telephone.

> 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 November 6,

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