

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

In re: Union Electric Company's 2011                    )  
Utility Resource Filing Pursuant to                    ) **Case No. EO-2011-0271**  
4 CSR 240 – Chapter 22.                                    )

**MOTION OF GRAIN BELT EXPRESS CLEAN LINE TO BE EXCUSED FROM  
PARTICIPATING IN HEARING**

Grain Belt Express Clean Line LLC (Clean Line) hereby files its Motion seeking permission from the Public Service Commission of the State of Missouri (Commission) to be excused from participating in the hearing scheduled to begin on December 15, 2011 in the above-captioned matter:

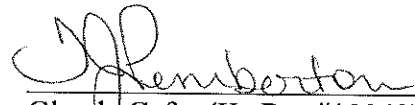
1. On March 28, 2011, the Commission granted Clean Line's request to intervene in this proceeding.
2. On June 23, 2011, parties to this matter, including Clean Line, filed comments for the Commission's consideration, pursuant to 4 CSR 240-22.080.
3. On September 16, 2011, several parties filed a jointly proposed procedural schedule. Clean Line did not join nor did it oppose the filing. On September 19, 2011, the Commission issued its Order approving the jointly proposed procedural schedule. The Order adopted the previously filed comments as pre-filed direct testimony, established dates for rebuttal, surrebuttal/cross-surrebuttal testimony, and set the matter for hearing to begin on December 15, 2011.

4. Other than the comments filed on June 23, 2011, Clean Line has not filed additional testimony for Commission consideration. Clean Line does not intend to conduct cross-examination of the witnesses at hearing, and as such does not believe its presence at the hearing will provide the Commission with additional substantial evidence to assist the Commission in making a determination in this matter. As a result, Clean Line respectfully requests to be excused from participating in the hearing set to begin on December 15, 2011.

WHEREFORE, Grain Belt Express Clean Line LLC respectfully requests the Commission grant this Motion excusing Clean Line from participating in the hearing set to begin on December 15, 2011.

Respectfully submitted,

Kathryn L. Patton  
Vice President and General Counsel  
Erin Szalkowski  
Corporate Counsel  
Clean Line Energy Partners LLC  
1001 McKinney, Suite 700  
Houston, TX 77002  
(832) 319-6330  
[kpatton@cleanlineenergy.com](mailto:kpatton@cleanlineenergy.com)

  
Glenda Cafer (Ks Bar #13342)  
(785) 271-9991  
Terri Pemberton (Mo Bar # 60492)  
(785) 232-2123  
CAFER LAW OFFICE, LLC  
3321 SW 6<sup>th</sup> Avenue  
Topeka, Kansas 66606  
[gcafer@sbcglobal.net](mailto:gcafer@sbcglobal.net)  
[terri@caferlaw.com](mailto:terri@caferlaw.com)

Attorneys for Grain Belt Express  
Clean Line LLC

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above *Motion of Grain Belt Express Clean Line, LLC* was electronically served, hand-delivered or mailed, postage prepaid, this 7<sup>th</sup> day of December, 2011 to:

General Counsel's Office  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102

Lewis R. Mills, Jr.  
P.O. Box 2230, Suite 650  
Jefferson City, MO 65102

Mid-Missouri Peaceworks  
Henry Robertson  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Mid-Missouri Peaceworks  
Kathleen Henry  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Mid-Missouri Peaceworks  
Bruce Morrison  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Missouri Coalition for the Environment  
Henry Robertson  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Missouri Coalition for the Environment  
Kathleen Henry  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Missouri Coalition for the Environment  
Bruce Morrison  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Missouri Department of Natural Resources  
Sarah Mangelsdorf  
207 West High St.  
P.O.Box 899  
Jefferson City, MO 65102

Missouri Energy Group  
Lisa Langeneckert  
600 Washington Avenue, 15<sup>th</sup> Floor  
St. Louis, MO 63101-1313

Missouri Industrial Energy Consumers  
Diana Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102

Natural Resources Defense Council  
Henry Robertson  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Natural Resources Defense Council  
Kathleen Henry  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Natural Resources Defense Council  
Bruce Morrison  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Natural Resources Defense Council  
Shannon Fisk  
2 N. Riverside Plaza, Suite 2250  
Chicago, IL 60606

Sierra Club  
Henry Robertson  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Sierra Club  
Kathleen Henry  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Sierra Club  
Bruce Morrison  
705 Olive Street, Suite 614  
St. Louis, MO 63101

Sierra Club  
Maxine Lipeles  
1 Brookings Dr – CB 1120  
St. Louis, MO 63130-4899

Union Electric Company  
Wendy Tatro  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

Union Electric Company  
Steven Sullivan  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

Union Electric Company  
Thomas Byrne  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

Douglas L. Healy  
Healy & Healy, Attorneys at Law, LLC  
939 Boonville, Suite A  
Springfield, MO 65802

  
\_\_\_\_\_  
TERRI PEMBERTON