

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)

SHOW ME CONCERNED LANDOWNERS' MOTION FOR CONTINUANCE

Comes Now Show Me Concerned Landowners (“Show Me”) and requests the Missouri Public Service Commission (“Commission”) grant a continuance in the hearing schedule in this case until Wednesday, March 22, assuming Show Me receives the data request response on or before Monday morning, March 20 and in support thereof states as follows:

1. Show Me issued and served applicant Grain Belt Express Clean Line, LLC (“Grain Belt”) five sets of data requests on March 7, 2017, to individual witnesses Galli, Berry, Shiflet, Copeland, and Arndt. According to the Commission’s *Order Setting Procedural Schedule and Other Procedural Requirements* issued in this case, the response time for data requests shall be 10 calendar days. Under the terms of the *Order*, all five responses should have been returned to Show Me on March 17, 2017. The responses of only witness Arndt were delivered on March 17, 2017.

2. On March 18, the undersigned attorney contacted the Grain Belt attorney via email and was informed that Grain Belt was “checking into it.” Upon a follow up telephone conversation, the undersigned attorney was advised that they would answer them as soon as possible.

3. Without the identified responses to the data requests, Show Me will be unable to prepare adequately for the hearing. It had planned on two full days to analyze and incorporate its analysis into its hearing preparation. Therefore, it is requesting a two-day continuance to the hearing schedule, assuming the responses are available to it by Monday morning, March 20.

4. The Commission should recognize that Grain Belt has significant legal and institutional resources. Show Me has limited resources that they are sacrificing to defend their land. Show Me has one lawyer to devote to this case unlike Grain Belt. He cannot divide his time between the hearing and hearing preparation as can Grain Belt's legal team.

WHEREFORE, Show Me requests a two-day continuance of the hearing in the above referenced case, until Wednesday, March 22, assuming Show Me receives the data request responses on or before Monday morning, March 20.

Respectfully submitted,

By: /s/ David C. Linton

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Attorney for Show Me Concerned
Landowners

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Compel was sent to all parties of record in File No. EA-2016-0358 via electronic transmission this 18th day of March, 2017.

/s/ David C. Linton