## 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 Current Transmission Line
and an Associated Converter Station
Providing an Interconnection on the
Maywood - Montgomery 345 kV transmission
Line.

Case No. EA-2016-0358

## APPLICATION TO INTERVENE OF THE EASTERN MISSOURI LANDOWNERS ALLIANCE DBA SHOW ME CONCERNED LANDOWNERS

COMES NOW the Eastern Missouri Landowners Alliance DBA Show Me Concerned Landowners ("Show Me"), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this case initiated by Grain Belt Express Clean Line LLC, ("Grain Belt"). In support of this application, Show Me states as follows:

1. Show Me is a non-profit corporation in good standing organized under the laws of the state of Missouri and doing business under a duly registered fictitious name. Show Me, created on April 4, 2014, has more than 400 members, all of which are concerned landowners with land which will be directly impacted by or near Grain Belt's proposed transmission line right of way. Attached hereto is a copy of the Eastern Missouri Landowners Alliance Certificate of Incorporation as Attachment 1. 2. Correspondence, communications, orders and the decision in this matter should be addressed to the undersigned counsel as well as the Secretary/Treasurer of Show Me at the following address:

Marilyn O'Bannon 17234 Route M Madison, MO 65263 marilyn.obannon@gmail.com

3. On August 30, 2016, Grain Belt filed an application with the Missouri Public Service Commission ("Commission") for a Certificate of Public Convenience and Necessity in the above referenced case.

4. Show Me's interest in this matter relates to the impact Grain Belt's proposed transmission line will have on their land. The members directly impacted by or near the proposed right of way could face declining property values, declining income and revenue, adverse health issues, interference with irrigation equipment and other farming operations, eminent domain proceedings, interference with the use and enjoyment of their land, and other adverse impacts directly due to Grain Belt's proposed transmission line. This interest is different than the general public interest and may be adversely affected by a final order arising from this case.

5. Show Me opposes the Application filed by Grain Belt and reserves the right to provide the Commission with more detailed positions on Grain Belt's proposals and testimony submitted in this case.

6. Show Me believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case, and wishes to become a party to this case for all purposes.

2

WHEREFORE, Show Me respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

By: <u>/s/ David C. Linton</u>

David C. Linton, #32198 314 Romaine Spring View Fenton, MO 63026 Telephone: 314-341-5769 Email: jdlinton@reagan.com

Attorney for Eastern Missouri Landowners Alliance

Filed: September 2, 2016

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all

parties of record in File No. EA-2016-0358 via electronic transmission this 2nd day of

September, 2016.

/s/ David C. Linton

## STATE OF MISSOURI

Jason Kander Secretary of State

CERTIFICATE OF INCORPORATION MISSOURI NONPROFIT

WHEREAS, Articles of Incorporation of

Eastern Missouri Landowners Alliance N01391232

have been received and filed in the Office of the Secretary of State, which Articles, in all respects, comply with the requirements of Missouri Nonprofit Corporation Law;

NOW, THEREFORE, I, JASON KANDER, Secretary of the State of Missouri do by virtue of the authority vested in me by law, do hereby certify and declare this entity a body corporate, duly organized this date and that it is entitled to all rights and privileges granted corporations organized under the Missouri Nonprofit Corporation Law.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 4th day of April, 2014.

Secretary of State



SOS #30 (01-2013)