

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Cheri Meadows,	)	
	)	
Complainant,	)	
	)	Case No. EC-2025-0136
v.	)	
	)	
	)	
Grain Belt Express, LLC,	)	
	)	
Respondent	)	

**MOTION TO COMPEL DISCOVERY**

COMES NOW, I, Cheri Meadows, for my Motion to Compel Discovery states as follows:

1. On May 16, 2025, I submitted data requests (“DR”) 18 and 19 to Grain Belt Express, LLC (“Grain Belt Express”).

2. DR 18 request was for communication between Jason Brown from Grain Belt Express and Greg Smith from Contract Land Service/CLS after Jason Brown admitted in front of me during our in-person meeting on March 28, 2024 that he and Greg had talked about me a lot.

3. My DR 18 reads:

During the visit to my house on March 28, 2024 as Jason Brown, Greg (Contract Land Services/CLS), Jordan (Invenergy) and I stood around talking, Jason Brown said that he and Greg had talked about me a lot. Please provide any notes/emails/texts/memos/voicemails/transcripts/or any other communication from Greg Smith or Jason Brown regarding those conversations that admittedly took place between Jason Brown and Greg Smith from CLS regarding me and my property both prior to and after our meeting.

4. Grain Belt Express objected to the DR 18, “..to the extent this question calls for materials that are subject to attorney-client privilege, the work product doctrine, or any other privileged communication. Grain Belt objects further to the basis of this question as it relies on hearsay and assumes contested facts.”

5. Jason Brown nor Greg Smith are attorneys and “privileged” communication can be interpreted numerous ways, but since it was admitted in my presence that these numerous conversations took place, it’s difficult to see how that communication would be “privileged” and not subject to discovery.

6. To date, Grain Belt Express has refused to provide a single document of any type from anyone within or associated with their organization regarding any communication about 1) moving the line off of my property, or 2) showing transparency with me regarding the routing and approval process when I continued to raise concerns and request the line be moved off of my property, clearly not understanding how the system worked.

7. My DR 13 from January 13, 2025 read:

Provide all documents, maps, memos, communications, transcripts, reports, risk assessments, notes, or any other documents, including electronic documents in the possession of Grain Belt Express, its routing contractor, and/or any other person or entity involved in the Tiger Connector line routing project that discussed my property.

8. Grain Belt Express responded, “Grain Belt Express objects to this Data Request because it is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence. The request contains no temporal bounds and is not narrowed to focus on any particular issue which related to a matter before the Commission—whether Grain Belt Express has violated any provision of law subject to the Commission’s authority relating to siting the line near Ms. Meadow’s property. Grain Belt Express objects to this Data Request to

the extent it calls for documents to the extent that it seeks documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege, including any information created after Grain Belt Express became aware of Ms. Meadows intention to dispute this matter before the Commission. Grain Belt objects to the extent this question calls for information that is readily available or more accessible to Ms. Meadows, including information that has already been produced to Ms. Meadows. Grain Belt further objects to this request on vagueness grounds, as the term “discussed my property” is vague with respect to the nature of documents sought. Grain Belt also objects to the extent the request calls for information that is not within the possession, custody, or control of Grain Belt Express, including documents that Ms. Meadows requests from “any other person or entity involved in the Tiger Connector line routing project.””

9. At the time, as being a pro se, non-attorney complainant, I did not know what, if any options I had to Grain Belt Express’s response and was surprised that after I had provided everything requested of me by Grain Belt Express, I was met with such a response to what seemed like a fair and applicable data request surrounding the details of my case.

10. On that March 28, 2024 day Jason Brown admitted that he and Greg Smith from CLS had had numerous conversations about me. By withholding them, Grain Belt Express is continuing to intentionally withhold possible key evidence regarding this case and my claim.

11. My DR 19 request was regarding tower placement that I had been shown by Jason Brown on his visit to my property on March 28, 2024 and was different than what the rendered map that Staff requested in their April 28, 2025 DR 12 indicated and was signed off on by Kevin Chandler.

12. My DR 19 reads:

In Staff's Data Request No. 0012, the map rendering of the current line along with a preliminary rendering of the line going north of my house shows the transmission towers of the current line different than what I was shown on the map provided by Jordan and Jason Brown on their March 28, 2024 visit to my property. During the visit to my house on March 28, 2024 Jason Brown indicated on the map that there would be a tower directly to the east of my property on the adjoining landowner. The map submitted in Data Request 12 no longer reflects that. When was that change made and why? Also, with the tower now shown at the northern most point on the properties south of my property, can you provide a rendering of the line being extended west from the 34/3 tower and remaining along the roadway approximately 700 feet before crossing the road at the gap in the trees just to the west of my property and connecting to the tower shown above the MO-CA-TG-027.000 description?

13. Grain Belt Express objected to this DR “..to the extent it calls for a rendering that is not in the possession, custody, or control of the responding party. Additionally, Grain Belt objects to this request as unduly burdensome to the extent it requires Grain Belt to prepare custom renderings that it does not currently possess and that could be prepared more easily by other parties using publicly accessible records. Grain Belt objects further to the basis of this question as it relies on hearsay and assumes contested facts.”

14. Since the public meeting in July 2022 where I specifically spoke to Jason Brown about rerouting the line south of me, to the numerous times I spoke with him on the phone and met with him and his colleagues in person about not wanting the line across my drive and property, but instead it be moved south of my property, Grain Belt Express's claim that they never once drew up a possible rendering of the line being moved south of me off of my property seems preposterous and like a blatantly false statement.

15. To date, my entire complaint has been based on the destruction and numerous risks the line poses in its current route and how they would be eliminated if the line were moved south a bit, relocating the line off of my property, yet Grain Belt Express asserts that they've never rendered that alternate route. That is their incredulous claim despite me even submitting

my own rendering of how moving the line off my property was possible while still keeping it on its same path away from my property.

16. By refusing to give any details about why I was shown where the towers would be near my property on the map provided by Jason Brown and Jordan, and the rendering of the current line with towers indicated being completely different, Grain Belt Express is essentially proving my point that Jason Brown was not truthful with me regarding this line. Prior to that meeting, I had no idea where the towers were going to be.

17. The information I am seeking is relevant to my case and should be provided per 20 CSR 4240-2.090. Using legal jargon that makes it difficult for a pro se complainant to argue against should not be allowed and the discovery process should be followed as it was written and intended without flamboyant excuses.

WHEREFORE, I respectfully request that the Commission compel Grain Belt Express to provide full and complete responses to my data requests 18 and 19.

Respectfully Submitted,

/s/ Cheri Meadows  
Cheri Meadows