

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

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

**PUBLIC COUNSEL’S REPLY TO GRAIN BELT
EXPRESS LLC’S MOTION FOR CLARIFICATION**

COMES NOW the Office of the Public Counsel (“OPC”) and in response to Grain Belt Express LLC’s (“Grain Belt”) June 16, 2025, Motion for Clarification, states:

1. The OPC offers this reply to correct Grain Belt’s mischaracterization of OPC counsel’s statement during the April 21, 2025, Prehearing Conference. OPC counsel’s statement should not be misinterpreted as stating discovery should be limited in any way during the reopened discovery period.¹

2. Discovery is typically applied equally to all parties and not limited by issue. *See* 20 CSR 4240-2.090. Consistent with this application, the Commission’s April 23, 2025, *Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing*, ordered, “Discovery is reopened with five days to object to a data request and ten days to respond to a data request.” If the Commission had meant to limit discovery, it would have stated as much in the order. There is no reason to arbitrarily limit any party’s ability to gather evidence and present their case. Moreover, Grain Belt has the benefit of

¹ It should also be noted that the transcript contains an error in that statements made by Judge Clark are attributed to OPC counsel. The error is not relevant to Grain Belt’s motion or this response. OPC counsel

“information asymmetry,” in that the Company possesses all the information regarding the project, and the other parties are at a disadvantage in that they must know what to request without knowing what relevant information Grain Belt possesses.

3. In addition, it should be noted that the parties are not flooding Grain Belt with excessive discovery. Grain Belt identifies only five (5) data requests sent since the Commission reopened discovery, and the OPC is aware of one additional data request. The Company has not stated or suggested that the additional discovery has placed any burden on Grain Belt.

4. The OPC believes the public interest is best served by not placing arbitrary limitations on discovery, and requests the Commission not limit the issues the parties are allowed to address in discovery.

WHEREFORE, the OPC offers this reply to Grain Belt’s Motion for Clarification.

Respectfully submitted,

/s/ Marc Poston

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believes the transcript should reflect OPC counsel’s statement ending on line 20 (Volume 3, Page 18), and that Judge Clark’s statement begins on the same line, with the sentence, “Staff makes a good point.”

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 20th day of June 2025.

/s/ Marc Poston
