

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**CHERI MEADOWS’ REPLY TO GRAIN BELT EXPRESS LLC’S MOTION FOR
CLARIFICATION OF ORDER DIRECTING FILINGS, REOPENING DISCOVERY,
AND CANCELING EVIDENTIARY HEARING**

I, Cheri Meadows hereby files this Reply to the June 17, 2025 Grain Belt Express LLC’s (“Grain Belt Express”, “Grain Belt”) Motion for Clarification of Order Directing Filings, Reopening Discovery, and Canceling Evidentiary Hearing (“Motion”). In support of my Reply and request, I state the following:

I. Background

1. On October 15, 2024, after getting guidance from the office of the Public Service Commission on how to do so, I filed a formal complaint with the Missouri Public Service Commission (“PSC”) asking that Grain Belt Express be required to move their Tiger Connector Line (“Line”, “the Line”) south of my property approximately 600 feet, placing it away from any residence and not jeopardizing anyone’s property, health, or safety.

2. Since filing my formal complaint, Grain Belt Express has been incessantly trying to get it dismissed, citing that I “*did not identify any law, rule, regulation or Commission Order that Grain Belt Express allegedly violated*” when, in fact, I did. In my formal complaint, under line number 8, after running out of room on line number 7, and trying to be thorough in my complaint, I wrote the following, “*Nobody has been able or willing to tell me why my property, which is the only house on a one-mile stretch of road, was not able to be avoided when another route slightly south of my property would have avoided all the risks and land clearing that will affect me.*”. I concluded with “*This is also contradictory to the Landowner Protocol which states “Grain Belt Express strives to implement the following key elements as part of its approach to easement negotiations:” “Providing clear information to landowners on the routing criteria used by Grain Belt Express.”*”. To this day, Grain Belt Express has still never provided me with “clear information on the routing criteria” that explains why they chose my easily avoided residential tree-covered property while stating in their “Findings of Fact” that they tried to “avoid residences” and “minimize impact to land”.

3. In my formal complaint, I also referenced the July 30, 2024 letter written by Andrew Schulte from Polsinelli to the Attorney General’s Office in response to my contacting them for help with getting the Line moved off of me. In the letter, Mr. Schulte wrote, “*Grain Belt Express is committed to considering reasonable reroute proposals from landowners, will respond in writing to reroute requests, and will track and follow through with its obligations to landowners.*” Despite discussing my concerns about the line going across my drive and existing electrical line and not wanting that with Jason Brown at the public open house in July 2022, to multiple conversations afterwards also discussing those same concerns and a safer option of moving the line south of my property in May 2023, June 2023, and August 2023 that were prior

to the PSC hearing or the Commission's decision, I never received anything in writing regarding my request that the Line be moved south of my property. To this day, nearly three years after I originally voiced my concerns, Grain Belt Express has yet to produce any documentation sent to me regarding what should have been a "reasonable reroute request", as Andrew Schulte referred to in his letter that stated "...[Grain Belt Express] will respond in writing to reroute requests, and will track and follow through with its obligations to landowners."

4. On March 5, 2025, following a procedural conference on February 20, 2025 where both the Office of Public Counsel ("OPC") and Staff agreed there was a possible violation, and the Commission agreed with Staff and OPC that I articulated a potential violation sufficient for the Commission to hear my complaint and an Order Denying Motion to Dismiss was filed.

5. On March 14, 2025, Grain Belt Express filed a Motion for Reconsideration, again wanting my complaint to be dismissed, and again reiterating that I had not cited any violation of ordering paragraph, Commission condition, or a provision of Grain Belt Express' Code of Conduct, Landowner Protocol, or Agricultural Impact Mitigation Protocols.

6. The mention of the Landowner Protocol being violated, which I included in my formal complaint, still has not been addressed. Whether that's because it was put in the wrong section as I tried to be as thorough in my complaint as possible, resulting in a very lengthy complaint, wasn't worded properly, or just wasn't considered an important part of my complaint by any of the other parties, is unknown. I believe it is still relevant to my complaint as well as my recent addition of the Code of Conduct breach.

7. In the New CCN Order in File No. EA-2023-0017, Commission Ordered Paragraph No. 9, listed on pages 73-74, states “*Grain Belt shall comply with the Missouri Landowner Protocol (Attachment 3), including, but not limited to, a Code of Conduct (Attachment 4)...*” My mentioning in my formal complaint of the Landowner Protocol being contradictory to my experience with Grain Belt Express should have been sufficient cause to warrant getting a hearing where all of the details, including the breach of Code of Conduct would have been brought up. Once Grain Belt’s Motion For Reconsideration was filed and the chance of my case being dismissed without me getting an opportunity to plead my case, and having had much more experience with the process, I went back to the Report and Order issued in October 2023 and read through the “Ordered Paragraphs” section to see if there was anything in those Orders that applied to my case. As indicated below with the underlining to show emphasis, there were several points that applied to my case and my experience in dealing with Jason Brown at Grain Belt Express.

8. Below is the Missouri Landowner Protocol’s Code of Conduct. (underlining indicates my emphasis):

Grain Belt Express Project Code of Conduct for Right-of-Way Agents and Subcontractor Employees

This Code of Conduct applies to all communications and interactions with property owners and occupants of property by all right-of-way agents and subcontractor employees representing Grain Belt Express in the negotiation of right-of-way and the performance of surveying, environmental assessments and other activities for the Grain Belt Express project on property not owned by Grain Belt Express.

I. All communications with property owners and occupants must be factually correct and made in good faith.

- a. Do provide maps and documents necessary to keep the landowner properly informed.*
- b. Do not make false or misleading statements.*
- c. Do not purposely or intentionally misrepresent any fact.*

- d. If you do not know the answer to a question, do not speculate about the answer. Advise the property owner that you will investigate the question and provide an answer later.*
- e. Follow-up in a timely manner on all commitments to provide additional information.*
- f. Do not send written communications suggesting an agreement has been reached when, in fact, an agreement has not been reached.*
- g. If information provided is subsequently determined to be incorrect, follow up with the landowner as soon as practical to provide the corrected information.*
- h. Do provide the landowner with appropriate contact information should additional contacts be necessary.*

II. All communications with property owners and occupants of property must be respectful and reflect fair dealing.

- a. When contacting a property owner in person, promptly identify yourself as representing Grain Belt Express.*
- b. When contacting a property owner by telephone, promptly identify yourself as representing Grain Belt Express.*
- c. Do not engage in behavior that may be considered harassing, coercive, manipulative, intimidating or causing undue pressure.*

9. During my interactions with Jason Brown, I was assured on more than one occasion that this line was “definitely going to happen” and construction would start “at the end of 2024 or first of 2025”. That was despite him knowing that there was no signed road agreement in place, no EIS (Environmental Impact Statement) completed, no loan guarantee, and several unsigned easement agreements from local landowners that are still being dealt with via condemnations, per a newspaper article from as recent as April. I felt then and still feel now that that was a pressure tactic used to try to get me to stop trying to get the line moved and just accept it.

II. Request for Discovery to Continue

10. While Grain Belt alleges they understood the opening of discovery to be only for the additional claim I addressed in my reply to their Motion for Reconsideration, that is not how I understood the reopening of discovery, hence why I’ve continued to submit data requests as I

look back over previous responses to data requests and motions, as well as some of the particulars of EC-2023-0017 that I feel apply to my case in its entirety.

11. As I am pro se and do not have any co-counsel or assistants who I can call on to help me look through any of the now numerous prior filings regarding my case or any of the massive amounts of information from the EC-2023-0017 case, I am having to do all of this on my own and between all of my other time commitments. Having the extra time for discovery has been helpful for me to look at previous and additional documents that pertain to the route and my case. I am in no way trying to take advantage of the extra time or waste anyone's time with my discovery questions or intentionally bypass any rules or regulations with my filings in my pursuit of that. I am only trying to make sure I do the best I can at representing myself and do a thorough job of gathering any evidence that is applicable to my case.

WHEREFORE, I respectfully request that the Commission allow all discovery related to my entire complaint to continue at this time.

Respectfully Submitted,

/s/ Cheri Meadows
Cheri Meadows