

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-2014-0207
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

Motion to Intervene on Behalf of the Missouri Landowners Alliance

Pursuant to Commission Rule 4 CSR 240-2.075, the Missouri Landowners Alliance (the Alliance) hereby files its Motion to Intervene. In support of this Motion, the Alliance states as follows:

1. The Alliance asks that communications regarding this case be directed to its counsel, whose contact information is provided below.
2. The Alliance is a Missouri not-for-profit corporation. As of April 5, 2014, the Alliance had 325 members.
3. Based on what the Alliance knows at this point about the proposed transmission line, it expects to oppose Grain Belt's Application in this case.
3. Membership in the Alliance consists for the most part of people who live near one or more of the routes identified earlier by Grain Belt as potential alternatives for its proposed transmission line. With Grain Belt having now proposed a single route for the line, approximately 65 % of the Alliance members live within the eight Missouri counties which would be crossed by the transmission line.
4. Some of the Alliance members live on the right-of-way of the proposed line. The property of those members might therefore be subject to eminent domain proceedings if the Commission approves Grain Belt's Application. Other members live

close to or in the general vicinity of the proposed right-of-way, and would therefore be affected to varying degrees even if they do not own property on the immediate right-of-way of the proposed line.

5. Intervention by the Alliance is a sensible and practicable means for a large number of landowners to be given a voice in a proceeding in which they have a vital interest.

6. For the reasons stated above, the Alliance and its members have interests which are different from that of the general public, and those interests would be adversely affected if Grain Belt's Application is approved by the Commission.

Wherefore, the Missouri Landowners Alliance respectfully asks the Commission to grant this Motion to Intervene.

Respectfully submitted,

/s/ Paul A. Agathen
Paul A. Agathen
Attorney for the Missouri Landowners Alliance
485 Oak Field Ct.
Washington, MO 63090
(636)980-6403
Paa0408@aol.com
MO Bar No. 24756

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served this 9th day of April, 2014, by email to the following:

Kevin Thompson
Staff General Counsel
Missouri Public Service Commission
Governor State Office Building
Jefferson City, MO 65101
Kevin.thompson@psc.mo.gov

Lewis Mills
Office of Public Counsel
Governor State Office Building
Jefferson City, MO 65101
opcservice@ded.mo.gov

Cary J. Kottler
General Counsel
Clean Line Energy Partners LLC
1001 McKinney Street, Suite 700
Houston, TX 77002
ckottler@cleanlineenergy.com

Karl Zobrist
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
Karl.zobrist@dentons.com

/s/ Paul A. Agathen
Paul A. Agathen
Attorney for the Missouri Landowners Alliance
485 Oak Field Ct.
Washington, MO 63090
(636)980-6403
Paa0408@aol.com
MO Bar No. 24756