

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Landowners Alliance, a non-profit Missouri Corporation)
)
 Complainant,)
)
 V.) Case No. EC-2014-0251
)
 Grain Belt Express Clean Line LLC, and)
 Grain Belt Express Holding LLC, and)
 Clean Line Energy Partners LLC)
)
 Respondents)

SUPPLEMENT TO
FORMAL COMPLAINT

Comes now the Missouri Landowners Alliance (the “Alliance”), and hereby files this Supplement to the Formal Complaint filed in this case by the Alliance against the above named respondents on March 11, 2014.

The Alliance desires to bring four publications to the attention of the Commission. All four were published after the original Complaint was filed on March 11. And more importantly, all four were published after Grain Belt filed its Application for the line certificate with the Commission in Case No. EA-2014-0207 on March 26, 2014.

1. The first document is a press release issued by Grain Belt, announcing the filing of its Application. A copy of that document is attached hereto as Exhibit 32.¹ The press release once again touts the supposed economic benefits of the proposed line, even

¹ Grain Belt’s website is at <http://www.grainbeltexpresscleanline.com/site/home> The press release can be found by starting at the “Updates” tab on the top menu bar, selecting “Project News” from the drop down menu, and then clicking on the press release of March 26, 2014.

though those benefits are now the very subject of testimony from Grain Belt in support of its Application in Case No. EA-2014-0207. (See testimony and exhibits of Dr. David G. Loomis).

2. The second document, marked as Exhibit 33, is from the “Benefits” section of Grain Belt’s website, which was complained of in the original Complaint.² However, Exhibit 33 was copied from the website on March 27, 2014, the day after Grain Belt filed its Application.

3. The third item is a trade journal article written on the day Grain Belt filed its Application with the Commission.³ In it, Grain Belt representatives are quoted about the supposed economic benefits which will result from the line; the supposed enhancements to the reliability of the transmission system which will result from the line; the supposed “clear and substantial need” for the line; and the minimal lack of interference for landowners which the line supposedly will create.

4. The final item is a newspaper article written by the Associated Press on the day after Grain Belt filed its Application.⁴ This article quotes Grain Belt’s Director of Development, Mark Lawlor, regarding their usual claims about economic benefits which supposedly will stem from the line.

As is apparent, Grain Belt intends to publicly argue its position on issues which will be litigated in its own Certification case, in tandem with the actual Commission proceeding itself.

² See Exh. 1 and pp. 9-10 of the Complaint.

³ The article is available at <http://www.utilityproducts.com/articles/elp-archives/2014/04/clean-line-files-for-missouri-approval-of-grain-belt-express-transmission-project.html>

⁴This article is available at <http://money.msn.com/business-news/article.aspx?feed=AP&date=20140327&id=17474128>

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document, and the Exhibits attached thereto, were served this ____ day of April, 2014, by first class U.S. mail to the following:

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