

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Union Electric Company d/b/a) Case No. EO-2026-0037
Ameren Missouri in its Next Triennial)
Compliance Filing or Next Annual Update)
Report.)

LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES

20 CSR 4240-22.080(4) permits parties to the last triennial compliance filing of a utility to file suggested special contemporary issues for the utility to consider in its triennial compliance filings and annual update reports. The special contemporary issues list must “identify new and evolving issues” and “may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing.” Grain Belt Express, LLC (“Grain Belt Express”) was a party to the last triennial compliance filing of Union Electric Company d/b/a Ameren Missouri (“Ameren” or the “Company”).¹ In support of its suggestions, Grain Belt Express hereby states as follows:

1. Pursuant to 20 CSR 4240-22.080(4), Grain Belt Express hereby recommends the following as special contemporary issues for consideration, analysis, and documentation by Ameren in its next integrated resource plan (“IRP”) triennial filing² and as a supplemental filing to its 2025 annual update report, to the extent not already addressed therein:³

¹ Order Granting Applications to Intervene, File No. EO-2024-0020 (Nov. 16, 2023).

² Ameren will file its next triennial filing on or around October 1, 2026. Ameren has not yet indicated whether it will address any of the Issues recommended below in its next triennial filing.

³ Ameren will file its next annual update on or around October 1, 2025. Ameren agreed to address Issues A and B in its 2025 annual update (*see* File No. EA-2024-0237, Unanimous Stipulation & Agreement, ¶ 5.h. (Oct. 17, 2024), but both Issues are also appropriately classified as special contemporary issues under the Commission’s rules. Ameren has not yet agreed to address Issue C, which is also appropriately classified as special contemporary issue.

- A. Ameren shall model and share the results of generation that can be delivered through Grain Belt Express to Ameren's service territory. For this modeling, Ameren shall use data for generic Kansas resources, including wind, solar, battery and natural gas generation, as distinct from data for generic Missouri and Midcontinent Independent System Operator ("MISO") resources. For this modeling, Ameren shall also use an ownership and delivery cost based on discussions between Ameren and Grain Belt Express. If a firm delivery cost cannot be provided by Grain Belt, Ameren shall use a range of delivery costs to account for uncertainties in what the actual ownership and delivery costs may be.
- B. Ameren shall weigh the reliability, resiliency, and operational benefits of HVDC transmission facilities. In particular, Ameren shall weigh resource diversity values, cost-effective black-start capabilities, active and reactive power control, voltage and frequency control, dynamic voltage support, emergency power control and power modulation, and damping of electro-mechanical oscillations.
- C. Ameren shall also assess the potential resource adequacy value provided by Grain Belt Express's ability to access available generation in neighboring regions. This value is separate from the capacity value of contracted resources with firm transmission on Grain Belt Express. Ameren shall conduct probabilistic analysis using a methodology equivalent to that used by

PowerGEM (formerly, Astrape) to evaluate the resource adequacy value of the North Plains Connector.⁴

2. Modeling generic Kansas generation resources (“Issue A”) is a special, contemporary issue because Grain Belt Express will soon provide a high-voltage direct current (“HVDC”) transmission connection from western Kansas into MISO. This will allow Ameren to access generation resources that would otherwise be difficult to deliver from the Southwest Power Pool (“SPP”) into MISO and which Ameren would not otherwise model. As the Company noted in its recent Change in Preferred Resource Plan, the Company is experiencing “significant growth” in load of between 500 MW and 2 GW by 2032. Generation from western Kansas through Grain Belt Express can provide diversified energy to address this expected load growth.

3. Issue A is also an unresolved deficiency from the 2023 triennial IRP. Grain Belt Express filed comments on Ameren’s 2023 triennial IRP on February 28, 2024, noting specifically that the IRP was deficient in that it, *inter alia*, failed to evaluate, identify, consider or analyze all existing supply-side resources, namely, Grain Belt Express and its associated energy resources, as required by Commission Rule 20 CSR 4240-22.040.⁵ The Commission has yet to address this deficiency in File No. EA-2024-0020,⁶ so it is appropriate to designate this deficiency as a special contemporary issue.

⁴ The probabilistic analysis conducted by PowerGEM of the North Plains Conductor is available at: https://northplainsconnector.com/wp-content/uploads/2024/06/North-Plains-Connector-Evaluation_Final-Report_Astrape-Reviewed_FINAL.pdf.

⁵ Grain Belt Express Comments to Ameren Missouri’s IRP, File No. EO-2024-0020, pp. 3–12 (Feb. 28, 2024).

⁶ See Grain Belt Express Motion for Commission Order on Deficiencies and Concerns, File No. EO-2024-0020 (June 6, 2025).

4. Considering the reliability, resiliency, and operational benefits of HVDC transmission facilities (“Issue B”) is a special, contemporary issue because Grain Belt Express will be the first operating HVDC, interregional transmission line in Ameren’s territory and will provide operational benefits that are unique to HVDC and interregional transmission.⁷ Accordingly, Issue B is both special and contemporary.

5. Issue B is also an unresolved deficiency from the 2023 triennial IRP. Grain Belt Express filed comments on Ameren’s 2023 triennial IRP on February 28, 2024, noting specifically that the IRP was deficient in that it, *inter alia*, failed to recognize Grain Belt Express as an advanced transmission system technology in accordance with Commission Rule 20 CSR 4240-22.045 and Commission Rule 20 CSR 4240-22.070.⁸ The Commission has yet to address this deficiency in File No. EA-2024-0020,⁹ so it is appropriate to designate this deficiency as a special contemporary issue.

6. The potential resource adequacy value (“Issue C”) is a special contemporary issue because Grain Belt Express will be the first transmission line connecting MISO, SPP, PJM Interconnection (“PJM”), and the Associated Electric Cooperative Inc. (“AECI”) service territories. Grain Belt Express’ resource adequacy value is distinct from the capacity value of contract resources with firm transmission on Grain Belt Express because when subscribers with firm transmission service are not utilizing available capacity (or if the line is not fully subscribed),

⁷ See Direct Testimony of Anthony Petti, File No. EA-2023-0017, Sch. AP-2, § 6 (Aug. 24, 2025) (Guidhouse Report: Grain Belt Express (GBX): Resilience and Reliability Values).

⁸ File No. EO-2024-0020, Grain Belt Express Comments to Ameren Missouri’s IRP, pp. 16–18 (Feb. 28, 2024).

⁹ See Grain Belt Express Motion for Commission Order on Deficiencies and Concerns, File No. EO-2024-0020 (June 6, 2025).

the line will be available to transfer non-firm flows between regions which in and of itself provides additional resource adequacy benefits to Ameren and more broadly to MISO.

7. Further, the subject of HVDC and interregional transmission resource adequacy value was the subject of a recent study by Americans for a Clean Energy Grid, which found:

Interregional transmission offers resource adequacy value because neighboring regions have differing resource mixes and times of peak load, so may have excess capacity to share when a neighbor needs it. Interregional transmission allows capacity resources to be shared between regions with noncoincident demand. The interregional transmission assets themselves tend to be available nearly 100% of the time. Consumers benefit from this sharing of reserves, both in terms of improved reliability and reduced costs. These reliability and economic benefits are heightened during grid stress events. Reliability authorities have confirmed this value, as demonstrated by the North American Electric Reliability Corporation (NERC) Interregional Transfer Capability Study ... which shows that load and generation availability differed across U.S. regions during Winter Storm Elliot....¹⁰

MISO also has an ongoing stakeholder process regarding the resource adequacy benefits of HVDC transmission, further demonstrating the contemporary and special nature of Issue C.¹¹

¹⁰ Resource Adequacy Value of Interregional Transmission (June 5, 2025), *available at* https://cleanenergygrid.org/wp-content/uploads/2025/06/250610_RAValueInterregionalTx_Corrections.pdf

¹¹ *See*, HVDC Capacity Accreditation & Pricing of External Resources (August 20, 2025), *available at* [https://cdn.misoenergy.org/20250820%20RASC%20Item%2010%20HVDC%20Capacity%20Accreditation%20and%20Pricing%20of%20External%20Resources%20\(RASC-2024-5\)713765.pdf](https://cdn.misoenergy.org/20250820%20RASC%20Item%2010%20HVDC%20Capacity%20Accreditation%20and%20Pricing%20of%20External%20Resources%20(RASC-2024-5)713765.pdf); *see also*, MISO's Dashboard Page addressing these topics: <https://www.misoenergy.org/engage/MISO-Dashboard/incorporating-hvdc-in-energy-and-ancillary-services-market-operations-as-well-as-transmission-planning/>.

WHEREFORE, Grain Belt Express respectfully requests that the Commission designate the foregoing Issues and special contemporary issues that Ameren must address in its next IRP triennial filing and as a supplemental filing to its 2025 annual update report, to the extent not already addressed therein.

Respectfully submitted,

POLSINELLI PC

By: /s/ Andrew Schulte

Andrew Schulte (#62194)
Jared Jevons (#75114)
900 W. 48th Place, Suite 900
Kansas City, MO 64112
aschulte@polsinelli.com
jjevons@polsinelli.com

Attorneys for Grain Belt Express LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties listed on the official service list by email this 15th day of September, 2025.

By: /s/ Andrew O. Schulte
Andrew O. Schulte