

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

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| In the Matter of the 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. |) | |

**AMEREN MISSOURI’S RESPONSE TO PROPOSED
SPECIAL CONTEMPORARY ISSUES**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) and, pursuant to 20 CSR 4240-22.080(4), submits to the Missouri Public Service Commission (“the Commission”) the following Response to Proposed Special Contemporary Issues:

1. 20 CSR 4240-22.080(4) requires Missouri’s electric utility companies to consider and analyze “special contemporary issues” in their Integrated Resource Plan (“IRP”) triennial compliance filing and in their annual IRP update reports.
2. On September 12, 2025, the Commission Staff submitted proposed special contemporary issues. On September 15, 2025, the Office of Public Counsel and Grain Belt Express, LLC, also submitted proposals.
3. The language of 20 CSR 4240-22.080(4) describes the purpose of the special contemporary issues list as “...to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning.” In addition, the rule provides that “[e]ach special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing.” 20 CSR 4240-22.080(4).

4. In making its decision about what specific issues a utility must address, the Commission should consider the significance and urgency of issues and the resources available to address them, both individually and in the aggregate. As a basic test, such issues must be “special,” they must be “contemporary,” and they must, in fact, be “issues.” This means that the issues must not only meet a threshold of significance in terms of their potential effect on resource decisions, but that the potential effect must also be imminent. The Commission should carefully consider whether the inclusion of certain special contemporary issues provides added value or diverts resources away from the analysis of other special contemporary issues, and important resource planning generally.¹

5. The Commission should also bear in mind the cost to the utility company (and ultimately, to customers) of analyzing each issue and whether or not certain special contemporary issues, which may necessitate hiring a consultant(s), are worth the cost of the utility's analysis.

6. Ameren Missouri has reviewed the proposed special contemporary issues lists proposed by the other parties and, as set forth in Attachment A, believes there is merit to a couple of the issues proposed by the parties to be treated as special contemporary issues. Ameren Missouri believes, however, that the remaining suggestions fall outside of the scope contemplated by 20 CSR 4240-22.080(4).

7. Ameren Missouri respectfully requests the Commission carefully consider which proposed issues are truly special contemporary issues as contemplated by 20 CSR 4240-22.080(4).

¹ See, e.g., *Order Establishing Special Contemporary Resource Planning Issues* at p. 3, File No. EO-2012-0039 (Oct. 19, 2011) (“... the Commission must choose the identified issues wisely to allow Ameren Missouri an opportunity to thoroughly address the chosen issues. Requiring the company to address every issue proposed by the various parties within the available time would only result in a superficial analysis that would be less helpful than a more detailed analysis of appropriately limited issues.”).

Otherwise, the IRP process is subject to hijack by special interests, which would fail to capture the stated intent of the Commission's IRP regulations.

8. Attachment A to this pleading contains Ameren Missouri's specific responses to all proposed Special Contemporary Issues. Ameren Missouri notes that the majority of proposals are items it is already incorporating in its 2026 IRP filing in line with existing rules and settlement agreements in other cases, so they do not merit being raised here or approved as Special Contemporary Issues: they are existing company obligations that Ameren Missouri will abide by. Ameren Missouri, however, objects to three proposals raised because it is not worth expending the resources to do so: two proposals involve new and unproven technologies, one of which has already been addressed by the Company, and the third proposal involves mothballing dispatchable generation, which has also been addressed by the Company for resources that could reasonably be affected. Ameren Missouri also objects to a portion of another issue involving modeling of certain issues involving large load customers because they exceed the scope of resource planning and are better addressed in the context of a rate case.

9. With the adjustments recommended in Attachment A, Ameren Missouri will incorporate a limited number of appropriate Special Contemporary Issues as determined by the Commission. Ameren Missouri looks forward to continuing to work with stakeholders to address the issues presented in this docket.

10. Lastly, the Staff suggests Ameren Missouri address the issues proposed by Staff "in its next triennial filing, and as a supplemental filing to its [2025] annual update report." The Commission should reject this request for a supplemental filing to the Company's 2025 annual update report as it is untimely and could open the door to endless and overlapping IRP dockets. The Commission's resource planning rules have specific due dates for suggestions, comments, data

requests and reports for a reason, and they should be respected. Specifically, 20 CSR 4240-22.080(4)(A) states no later than September 15, staff, public counsel, and other stakeholders may file suggested special contemporary issues for each utility to consider. Further, 20 CSR 4240-22.080(4)(C) states, "No later than November 1, an order containing a list of special contemporary issues shall be issued by the commission for each utility to analyze and document in its **next triennial compliance filing or annual update report.**" [emphasis added] Ameren Missouri filed its 2025 IRP annual update report on September 30, 2025, and it included the Company's consideration of special contemporary issues ordered by the Commission in File No. EO-2025-0077; Staff had the opportunity to make suggestions for inclusion in the Company's' 2025 IRP annual update prior to Commission's order in that docket. Special contemporary issues the Commission includes in its upcoming order should be addressed in the Company's next triennial compliance filing, as the Commission's IRP rules require.

WHEREFORE, Union Electric Company d/b/a Ameren Missouri submits its attached comments on the proposed list of special contemporary issues and requests, pursuant to 20 CSR 4240-22.080(4)(C), that the Commission issue an order identifying only the issues listed herein at paragraph 9 as special contemporary issues.

Respectfully Submitted,

/s/ Paula N. Johnson

Paula N. Johnson, #68963
Senior Corporate Counsel
1901 Chouteau Avenue, MC 1310
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 861-3220 (phone)
(314) 554-4014 (facsimile)
amerenmoservice@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 1st day of October 2025, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson

Paula N. Johnson

**2026 IRP Special Contemporary Issues
Ameren Missouri Comments**

Issues Proposed by the Parties and the Company's Assessment

Staff Issues:

Staff Issue 1: Provide nuclear power plant timelines for permits and construction at both brownfield and greenfield sites, including transmission capacity needs at a greenfield site. Additionally, address available nuclear tax credits and eligibility to receive them based on milestone requirements. Discuss nuclear credits and state policies on energy standards.

Ameren Missouri's Assessment and Recommendation: Ameren Missouri does not oppose having this issue considered as a special contemporary issue. This special contemporary issue is similar to OPC Issue 2.

Staff Issue 2: Large load customers – provide:

- a. Current pipeline of large load customers and which are likely to materialize;
- b. Discussion on interconnection;
- c. Potential impact if load does not persist for more than 5, 10, 15 years;
- d. Ratepayer impact, by class, if current Company cost allocation is utilized; and
- e. Risk analysis:
 - i. Ratepayer
 - ii. Shareholder
 - iii. Fuel Adjustment Clause (“FAC”) impacts
 - iv. Cost of Renewable Energy Standard (“RES”) compliance
 - v. Changes in load profile or magnitude

Ameren Missouri's Assessment and Recommendation: Ameren Missouri does not object to some issues – namely 2a, 2b and 2c. Because IRPs are focused on aggregate customer costs and system average rates, class-level rate analysis (issue 2d) is not practical. The Commission's IRP rules require utilities to analyze and present only average rates¹, and Ameren Missouri will report the average rates for each alternative resource plan analyzed including various large load additions.

¹ 20 CSR 4240-22.060 (2)(A)4, 20 CSR 4240-22.060 (2)(A)5, 20 CSR 4240-22.060 (4)(C)1.B

For issue 2e, Ameren Missouri would conceptually assess ratepayer risks (2e.i) and shareholder risks (2e.ii). Specific ratemaking issues such as FAC recovery (2e.iii) are better addressed in cases involving explicit review of cost allocation and recovery. Ameren Missouri can assess different levels and profiles for LLC demand over the planning horizon, as it did in its 2025 Notice of Change in PRP filing (File No. EO-2025-0235). Issues 2e.iv and 2e.v are already addressed as part of the IRP process and should not be considered special contemporary issues.

Staff Issue 3: Update capacity purchase amount and price per kW.

Ameren Missouri's Assessment and Recommendation: This issue is a regular resource planning item as the Commission's IRP rules require consideration of PPAs (20 CSR 4240-22.040(1)); therefore, it should not be considered a special contemporary issue.

Staff Issue 4: Battery range of costs, operational characteristics and useful life.

Ameren Missouri's Assessment and Recommendation: This issue is a regular resource planning item as the Commission's IRP rules require the utility to study supply-side resources (20 CSR 4240-22.040(1)); therefore, it should not be considered a special contemporary issue.

Staff Issue 5: Zonal transmission import/export limitations; and company/zonal resource adequacy requirements by season.

Ameren Missouri's Assessment and Recommendation: The transmission import/export issue is covered as part of the resource planning rule 20 CSR 4240-22.045, and seasonal zonal requirements are included in our capacity positions already and should therefore not be considered a special contemporary issue.

OPC Issues:

OPC Issue 1: Model RES Requirement Generation in Various Large Load Scenarios

Ameren Missouri's Assessment and Recommendation: RES compliance analysis is performed for every IRP; therefore, it should not be considered a special contemporary issue. That said, Ameren Missouri plans to evaluate RES needs for different levels of large load customer (LLC) demand.

OPC Issue 2: Review of New Developments in Small Modular Nuclear Reactor Technology and Commitments.

Ameren Missouri's Assessment and Recommendation: Similar to Staff Issue 1, Ameren Missouri does not oppose having this issue considered as a special contemporary issue.

OPC Issue 3: Analysis of Mothballing Dispatchable Energy Generation

Ameren Missouri's Assessment and Recommendation: This issue was already addressed in Ameren Missouri's 2024 IRP Annual Update for Labadie Energy Center, and does not make sense to repeat for Sioux Energy Center (as mentioned in the Company's 2024 IRP Annual Update) nor for gas-fired CTGs, which routinely sit idle for long periods; therefore, it should not be considered a special contemporary issue for the Company's 2026 IRP.

OPC Issue 4: Supercritical Carbon Dioxide Power Cycles

Ameren Missouri's Assessment and Recommendation: This topic has been addressed in the Company's 2025 IRP Annual Update; therefore, it should not be considered a special contemporary issue for the Company's 2026 IRP.

OPC Issue 5: Geologic Hydrogen Onsite or Near Natural Gas Storage

Ameren Missouri's Assessment and Recommendation: This storage method is not close to achieving commercial viability, as OPC acknowledges in its description of the issue,² therefore, it should not be considered a special contemporary issue.

Grain Belt Express:

Grain Belt Express 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.

Ameren Missouri's Assessment and Recommendation: This issue is being addressed pursuant to the stipulation and agreement approved by the Commission in File No. EA-2024-0237³; therefore, it should not be considered a special contemporary issue.

² OPC states in its pleading suggesting special contemporary issues that, "At this point the technology for production of electricity by geologic hydrogen is not in use and is in the preliminary stages..."

³ Stipulation and Agreement paragraph 5.h.

Grain Belt Express Issue 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.

Ameren Missouri's Assessment and Recommendation: This issue is being addressed pursuant to the stipulation and agreement approved by the Commission in File No. EA-2024-0237⁴; therefore, it should not be considered a special contemporary issue.

Grain Belt Express Issue 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.

Ameren Missouri's Assessment and Recommendation: This issue goes beyond the bounds of IRP requirements to evaluate "generic" resources and contemplates analysis that is outside the resource adequacy considerations of Ameren Missouri; therefore, it should not be considered a special contemporary issue. Regardless, Ameren Missouri has already evaluated the broader market benefits of two-way flow on the GBX line as part of its analysis pursuant to the aforementioned stipulation and agreement and included in the Company's 2025 IRP Annual Update.

⁴ Stipulation and Agreement paragraph 5.h.