

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) File No. EO-2026-0037
Ameren Missouri in its Next Triennial)
Compliance Filing or Next Annual Update)
Report.)

**REPLY TO AMEREN MISSOURI'S RESPONSE TO PROPOSED SPECIAL
CONTEMPORARY ISSUES**

In support of its Reply to the October 1, 2025 Response filed by Union Electric Company d/b/a Ameren Missouri (“Ameren” or the “Company”), Grain Belt Express hereby states as follows:

1. On September 15, 2025, pursuant to 20 CSR 4240-22.080(4), Grain Belt Express recommended the following as special contemporary issues for consideration, analysis, and documentation by Union Electric Company d/b/a Ameren Missouri (“Ameren” or the “Company”) in its next integrated resource plan (“IRP”) triennial filing¹ and as a supplemental filing to its 2025 annual update report, to the extent not already addressed therein:²

- 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

¹ 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.

² 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 a special contemporary issue.

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.³

³ 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.

2. On October 1, 2025, Ameren filed its Response to the proposed special contemporary issues filed by Grain Belt Express, the Commission Staff, and the Office of Public Counsel.

3. Ameren rejected Grain Belt Express' proposed special contemporary issues A and B, asserting that "the issue is being addressed pursuant to the stipulation and agreement approved by the Commission in File No. EA-2024-0237 and therefore it should not be considered a special contemporary issue."⁴ For Grain Belt Express' proposed special contemporary issue C, Ameren argues that it should not be considered a special contemporary issue because 1) it goes beyond the bounds of IRP requirements to evaluate "generic" resources and contemplates analysis outside the resource adequacy considerations of Ameren; and 2) Ameren has already evaluated the broader market benefits of two-way flow on the GBX line as part of the analysis pursuant to the stipulation and agreement and included in the Company's 2025 IRP Annual Update.⁵

4. Ameren conflates its obligations pursuant to the Commission-approved stipulation and agreement with its ongoing responsibilities in accordance with the Commission's IRP rules. Ameren's singular, isolated analysis of the Grain Belt Express project pursuant to the stipulation and agreement is insufficient for compliance with the IRP rules; rather, Ameren must incorporate consideration of the Grain Belt Express project as a potential supply side resource within its IRP studies going forward. It is clear that Ameren is not studying the Grain Belt Express project as part of its ongoing IRP planning process but merely as a standalone analysis, which is short-sighted given Ameren's anticipated dramatic increase in large loads and its obligation to evaluate all

⁴ Ameren Missouri's Response to Proposed Special Contemporary Issues, Att. A, p. 4.

⁵ *Id.*

potential supply-side resources and advanced transmission system technologies as required by the Commission's IRP regulations.

5. Irrespective of whether Ameren is addressing issues A and B pursuant to the settlement agreement in File No. EA-2024-0237, these issues are still appropriately classified as special contemporary issues pursuant to the Commission's rules as they are unresolved deficiencies from Ameren's 2023 triennial IRP.

6. 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 4240-22.040.⁶ The Commission has yet to address this deficiency in File No. EA-2024-0020,⁷ so it is appropriate to designate this deficiency as a special contemporary issue.

7. 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

⁶ Grain Belt Express Comments to Ameren Missouri's IRP, File No. EO-2024-0020, pp. 3–12 (Feb. 28, 2024).

⁷ See Grain Belt Express Motion for Commission Order on Deficiencies and Concerns, File No. EO-2024-0020 (June 6, 2025).

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

deficiency in File No. EA-2024-0020,⁹ so it is appropriate to designate this deficiency as a special contemporary issue.

8. Given MISO’s ongoing stakeholder process reviewing the resource adequacy benefits of HVDC transmission and its commitment to review capacity accreditation for interregional transmission this year, with MISO’s final evaluation and stakeholder workshop scheduled for December 2025,¹⁰ the potential resource adequacy value (“Issue C”) of Grain Belt Express clearly is a special contemporary issue as it is a “new and evolving issue” within the meaning of 20 CSR 4240-22-080(4). Ameren’s assertion that consideration of Issue C is “outside the resource adequacy considerations of Ameren Missouri” should be disregarded.

WHEREFORE, Grain Belt Express respectfully requests that the Commission designate its suggested Issues A, B, and C as 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,

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

¹⁰ See HVDC Capacity Accreditation & Pricing of External Resources (Aug. 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/>.

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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 10th day of October, 2025.

By: /s/ Anne E. Callenbach
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