

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

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its Certificate)
Of Convenience and Necessity Authorizing it to)
Construct, Own, Operate, Control, Manage, and) File No. EA-2023-0017
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station.)

AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") pursuant to 20 CSR 4240-2.075, and for its Application for Intervention in this case, states as follows:

1. Ameren Missouri is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). There is already on file with the Commission a certified copy of the Company's Articles of Incorporation (See Commission File No. EA-87-105), a Certificate of Corporate Good Standing (See File No. EA-2022-0245), and a copy of the Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See File No. EN-2011-0069), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel and to:

Steve Wills
Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue (MC 1450)
St. Louis, MO 63103
swills@ameren.com

3. Ameren Missouri's interest in this case arises from several facts and circumstances. First, Grain Belt Express LLC ("Grain Belt") intends to interconnect the proposed line to Ameren Missouri's McCredie substation in Callaway County, Missouri. Second, as Ameren Missouri indicated in recent filings made pursuant to Chapter 22 of the Commission's rules (governing Resource Planning), the Grain Belt transmission line could be used by the Company to deliver 1,000 megawatts of renewable energy from western Kansas to Ameren Missouri's service territory (based on the project plans, via the interconnection at McCredie), to meet Ameren Missouri's need for additional generation capacity and energy. *See* Chapter 10, pp. 5-6 of Ameren Missouri's 2020 Triennial Integrated Resource Plan ("IRP"), File No. EO-2021-0021); *see also* Ameren Missouri's Change in Preferred Resource Plan Report, p. 6, File No. EO-2022-0362 (noting the benefits of geographical diversity since the sun may shine or the wind may blow in other states at different times than it might in Missouri; the Report also discussed possible renewable energy resource additions in other states, including Kansas). Third, Grain Belt itself, in its Application and testimony in this case, points to Ameren Missouri's IRP, Ameren Missouri's need for a diverse supply of energy, and Ameren Missouri's own demand for renewable energy and the preferences of Ameren Missouri customers for renewable energy as drivers supporting the need for the Grain Belt project.

4. Given these facts and circumstances, the Commission's consideration of Grain Belt's Application in this case could, as a practical matter, have either a positive or adverse impact on Ameren Missouri's interests, including on its resource planning and energy supply options, making Ameren Missouri's interests different than the interests of the general public. Moreover, Ameren Missouri's intervention is in the public interest as it may aid the Commission in addressing the issues raised by Grain Belt's Application given that Ameren Missouri is best positioned to answer questions and address issues relating to the potential impacts of approving or not approving

Grain Belt's Application in this case.

4. At this early juncture of the case, Ameren Missouri has not determined its position on the issues in this case.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

/s/ James B. Lowery

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/s/ Wendy K. Tatro

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 23rd day of September, 2022.

/s/ James B. Lowery
James B. Lowery