

**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 STATEMENT OF POSITIONS

Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”) hereby submits its Statement of Positions in accordance with the Procedural Schedule set for the above-captioned proceeding. The issues set out below are taken from the *Joint List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements* submitted by the parties on May 22, 2023.

1. Does the evidence establish that the following amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are “necessary or convenient for the public service” within the meaning of that phrase under section 393.170, RSMo:

- a. Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW.
- b. Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.
- c. Constructing the Project in two phases.
 - i. If the Commission determines that constructing the project in two phases is “necessary or convenient for the public service,” should the

Commission approve a modification to the “Financing Conditions,” as set forth in Section I of Exhibit 1 to the Report & Order on Remand in Case No. EA-2016-0358, to allow for constructing the Project in two phases?

Ameren Missouri takes no position at this time.

2. Should the Commission approve a modification of the Landowner Protocols, as referenced and incorporated into the Report & Order on Remand in Case No. EA-2016-0358, to modify the compensation package offered to Tiger Connector landowners?

Ameren Missouri takes no position at this time.

3. Should the Commission approve a modification of Ordering Paragraph 5 in the Report & Order on Remand in Case No. EA-2016-0358, such that easements obtained by means of eminent domain must be returned to the fee simple title holder if Grain Belt Express LLC does not satisfy the Financing Conditions within seven years, rather than five years, from the date that such easement rights are recorded with the appropriate county recorder of deeds?

Ameren Missouri takes no position at this time.

4. If the Commission approves any or all of the foregoing amendments, what conditions, if any, should the Commission impose?

Ameren Missouri takes no position at this time.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, MO Bar #40503

JBL Law, LLC

3406 Whitney Ct.

Columbia, MO 65203

Telephone: (573) 476-0050

lowery@jblawllc.com

Wendy K. Tatro, MO Bar #60261

Director and Assistant General Counsel

Ameren Missouri

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-3484 (phone)

(314) 554-4014 (fax)

AmerenMOService@ameren.com

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

Dated: May 30, 2023

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on counsel for all parties of record in this docket via electronic mail (e-mail) on this 30th day of May, 2023.

/s/Wendy K. Tatro

Wendy K. Tatro