

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2023 Utility Resource Filing) File No. EO-2024-0020
Pursuant to 20 CSR 4240-Chapter 22.)

GRAIN BELT EXPRESS LLC APPLICATION TO INTERVENE

COMES NOW Grain Belt Express LLC (“Grain Belt Express”), by and through counsel, pursuant to Commission Rule 4 CS 4240-2.075, and respectfully files its Application to Intervene in this proceeding. In support of its Application to Intervene, Grain Belt Express states as follows:

1. On July 28, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed a Notice with the Commission indicating its intent to file its triennial Integrated Resource Plan (“IRP”), as required by the Commission’s Electric Utility Resource Planning reporting requirements contained in 4 CSR 4240-22. Ameren Missouri subsequently filed its IRP on September 26, 2023, and the Commission issued an order on September 27, 2023 requiring entities that wished to intervene to file their applications for intervention by October 30, 2023.

2. Grain Belt Express is a limited liability company (“LLC”) organized under the laws of the State of Indiana. Grain Belt Express was formed in 2010 as a Delaware LLC and converted to an Indiana LLC in February 2013. Grain Belt Express’ principal offices are located at One South Wacker Drive, Suite 1800, Chicago, IL 60606.

3. Grain Belt Express is a wholly-owned subsidiary of Invenergy Transmission LLC (“Invenergy Transmission”), a Delaware limited liability company, which is a wholly-owned subsidiary of Invenergy Renewables LLC (“Invenergy Renewables”), also a Delaware limited

liability company. Invenergy Transmission is an affiliate company of Invenergy LLC, which is an Illinois limited liability company.

4. Grain Belt Express is an electrical corporation and public utility regulated by this Commission. Grain Belt Express holds a certificate of convenience and necessity (“CCN”) pursuant to Section 393.170.1 RSMo., as determined by the Commission’s March 20, 2019 Report & Order on Remand in File No. EA-2016-0358, as amended by the Commission’s October 12, 2023 Report and Order in File No. EA-2023-0017, to construct, install, own, operate, maintain, and otherwise control and manage an approximately 800-mile, overhead, multi-terminal ±600 kilovolt (“kV”) high-voltage, direct current (“HVDC”) transmission line and associated facilities including converter stations and alternating current (“AC”) connector lines (the “Project”).

5. In addition to the undersigned counsel, correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to:

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6. Once constructed, the Grain Belt Express Project will be capable of delivering a total of up to 2,500 MW of power into the MISO and AECI grids at delivery points in Missouri, and will (a) allow large amounts of renewable energy from southwestern Kansas to access the

MISO markets and compete to serve customer load, (b) support development of wind and solar facilities where the resources are such that electricity can be generated at significantly lower cost and greater output than currently available in Missouri, (c) enable low-cost renewable energy to access the Missouri electricity markets and reduce wholesale and retail electric prices, and (d) help customers in Missouri meet their various renewable energy and carbon reduction standards. The Commission’s recent Report & Order recognized that “Grain Belt remains the best option for low cost renewable energy delivered into MISO” and that “the Project will provide a better fit to local capacity needs than local solar resources.”¹

7. Ameren has an ambitious plan to reduce CO2 emissions 60% by 2030, 85% by 2040 and to reach net zero emissions by 2045. Grain Belt Express is expected to deliver up to 15 million megawatt-hours (“MWh”) of clean energy per year into the Project’s Missouri converter station, and up to 15 million MWh of clean energy into the Project’s Illinois converter station. The total annual deliveries of up to 30 million MWh will be enough to serve the annual electricity needs of around 3 million homes.

8. Ameren’s current IRP reflects a supply side planning strategy dependent on “the development of [yet unidentified] commercially viable clean dispatchable technologies in the coming years,” but does not evaluate the reliability and resiliency benefits associated with geographically diverse, uncorrelated wind or solar assets located outside of the MISO region. Grain Belt Express can deliver wind from Kansas that is uncorrelated to solar production within MISO. This relationship will reduce risk of supply shortfall and therefore reduce the need for backup generation. The Project can also deliver solar energy from Kansas that will continue producing at a higher capacity factor for nearly two hours later than solar within Missouri, reducing

¹ File No. EA-2023-0017, Report and Order, pp. 20-23.

the pace of ramping required in the evening. Grain Belt Express will provide geographically diverse resources to Missouri, which “inevitably helps to reduce system variability and uncertainty in regional energy systems.”

9. Ameren notes in its new supply-side resources analysis that “large scale wind resources exhibit the lowest cost on a levelized cost of energy (LCOE) basis among all candidate resource options [with or] without tax incentives.”² However, “[h]istorically, Missouri has seen limited deployment of wind generation compared to its western neighbor states,” and “[i]n the near-term, wind project opportunities in Ameren Missouri’s region appear more limited than solar project opportunities.”³ Yet, the supply-side resources analysis does not assess the availability of wind generation in western neighbor states. Grain Belt Express has received state siting approvals in all four states and has acquired 95% of the right of way for Phase 1 for delivery of Western Kansas wind into the Ameren service territory.

10. Ameren’s stated goal in its IRP is to “ensure that we can meet our customers’ energy needs in all hours, even during extreme weather events,” and notes in its filing that, “[o]ver the last year, we have seen increasing concerns regarding reliability and the sufficiency of resources to meet customer needs, especially during extreme weather events.”⁴ As the Commission further noted in its recent Report and Order, Grain Belt Express “will bring the interconnectivity to multiple regions to improve the reliability and resiliency of the grid for Missourians and in the interest of national security. This will help guard against price spikes and outages such as those experienced by Winter Storm Uri and Elliot.”⁵

² File No. EO-2024-0020, 2023 Integrated Resource Plan, Ch. 6, p. 1.

³ *Id.* pp. 9-10.

⁴ File No. EO-2024-0020, 2023 Integrated Resource Plan, Executive Summary, p. 1.

⁵ File No. EA-2023-0017, Report and Order, p. 56.

11. Grain Belt Express has direct and immediate interests in this proceeding that are not currently represented in this matter. Accordingly, Grain Belt Express meets the requirements for intervention under 20 CSR 4240-2.075(3)(A).

12. Granting Grain Belt Express' intervention would serve the public interest by allowing its insight, expertise, and experience to be a part of the IRP process and to ensure a comprehensive record in this case. Accordingly, Grain Belt Express also meets the requirements for intervention under 20 CSR 4240-2.075(3)(B).

13. No party will be prejudiced by Grain Belt Express' intervention in this matter.

WHEREFORE, Grain Belt Express respectfully requests the Commission grant its Application to Intervene in the above-captioned matter with full rights of participation.

Respectfully submitted,

/s/ Anne E. Callenbach

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ATTORNEYS FOR GRAIN BELT EXPRESS LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the parties listed on the official service list by email, this 26th day of October 2023.

/s/ Anne E. Callenbach
Attorney for Grain Belt Express