

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

In the Matter of The Determination of Special
Contemporary Resource Planning Issues to be
Addressed by Ameren Missouri in its Next
Triennial Compliance or Next Annual Update
Report

File No. EO-2024-0042

**MOTION TO EXPAND SPECIAL CONTEMPORARY
RESOURCE PLANNING ISSUES OUT OF TIME**

COMES NOW Renew Missouri, by and through counsel, and respectfully files this motion that the Commission expand the scope of issues¹ Union Electric Company d/b/a Ameren Missouri (“Ameren”) should consider in its next integrated resource planning compliance filing or annual update. In support of its motion, Renew Missouri states as follows:

1. On August 25, 2023, in accordance with 20 CSR 4240-22.080(4), the Commission issued an Order opening this docket to seek input regarding special contemporary resource planning issues for Ameren to consider and analyze either in its next triennial compliance filing or annual update report. That Order also provided that interested parties may file suggested issues for consideration no later than September 15, 2023, and directed that all parties to File No. EO-2021-0021 be made parties to this proceeding. Renew Missouri was a party in that proceeding and is thus also a party to this case.

2. On September 15, 2023, Sierra Club and the Office of Public Counsel filed pleadings in this matter suggesting special contemporary issues for Ameren’s consideration.

¹ Although Renew Missouri is not specifically requesting reconsideration or rehearing of the Commission’s October 25, 2023 Order Establishing Special Contemporary Issues, Renew Missouri is mindful that its request to add a suggested issue for consideration in Ameren’s resource planning may be construed as such. Thus, Renew Missouri is filing this request within the ten-day time period for rehearing or reconsideration established in 20 CSR 4240-2.160(2).

Thereafter, on October 25, 2023, the Commission issued an Order establishing the special contemporary resource planning issues for Ameren to consider.

3. The Commission has previously recognized that it has broad discretion to determine the issues a utility should be required to address, stating:²

The purpose of the contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical or customer issues are adequately addressed by each utility in its resource planning.

4. Renew Missouri respectfully suggests that the recently amended and approved Grain Belt Express Project is one such example of an evolving regulatory and energy issue that should be considered by utilities in their resource planning. On October 12, 2023, in File No. EA-2023-0017 the Commission issued an Order amending the previously-granted certificate³ of convenience and necessity (“CCN”) held by Grain Belt Express 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. 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

² File No. EO-2024-0042, *Order Establishing Special Contemporary Resource Planning Issues*, October 25, 2023.

³ File No. EA-2016-0358, *Report and Order on Remand*, March 20, 2019.

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 October 12, 2023 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.”⁴

6. 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, such as the Grain Belt Express project. Grain Belt Express can deliver wind from Kansas that is uncorrelated to solar production within MISO, which will reduce the risk of supply shortfall and thereby reduce the need for backup generation. Grain Belt Express 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 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.”⁵

7. As the Commission recently recognized in its October 12, 2023 Report and Order regarding the Grain Belt Express amendment:⁶

There can be no debate that our energy future will require more diversity in energy resources, particularly renewable resources. We are witnessing a worldwide, long-term and comprehensive movement towards renewable energy. The energy on the [Grain Belt] Project provides great promise as a source for affordable, reliable, safe, and environmentally-friendly energy that will increase resiliency of the grid. The Project will facilitate this

⁴ File No. EA-2023-0017, *Report and Order*, pp. 20-23.

⁵ Id. at p. 60.

⁶ File No. EA-2023-0017, *Report and Order*, pp. 63-64.

movement in Missouri, will thereby benefit Missouri citizens, and is, with the conditions set out below, in the public interest.

8. Renew Missouri agrees with the Commission that the Grain Belt Express project provides great promise as a source for affordable, reliable, safe, and environmentally-friendly energy that will benefit Missouri citizens. Accordingly, Renew Missouri submits that the potential impact of the Grain Belt Express project on Ameren's resource planning is an issue of particular interest and importance such that it should be addressed in Ameren Missouri's next IRP filing.

9. 20 CSR 4240-2.050(3) permits the Commission to accept late-filed pleadings in cases of excusable neglect or for other good cause shown. Renew Missouri has been supportive of the Grain Belt Express project since its inception, and actively participated in the amendment proceeding. As the Commission's Report & Order amending Grain Belt's certificate was issued on October 12, 2023, subsequent to the deadline for suggestions and comments for interested parties in this case, Renew Missouri submits that it could not have suggested that Ameren consider the impact of the Grain Belt Express project prior to the Commission's October 12, 2023 Report and Order. Accordingly, Renew Missouri submits that good cause exists for its out-of-time request that Ameren consider this issue as soon as possible. Although the regulations specify that a utility may consider special contemporary issues either in its triennial compliance filing or its next annual update, Renew Missouri believes the analysis of the Grain Belt Express project is important enough to warrant earlier consideration, ideally Ameren's currently pending IRP case. In the alternative if the Commission elects not to require Ameren to consider this issue sooner, then Renew Missouri respectfully requests that the Commission require Ameren to consider this issue in the next compliance filing or next annual update. Renew Missouri submits that no party will be prejudiced by this request.

WHEREFORE, Renew Missouri respectfully requests that the Commission (1) accept these suggestions for Ameren's next compliance filing or annual update filing; and (2) issue a revised Order establishing the special contemporary resource planning issues for Ameren to consider in its next Missouri IRP filing.

Respectfully submitted,

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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 6th day of November 2023.

/s/ Andrew J. Linhares
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