



5. Grain Belt's Cross-Response reiterates some of the same comments asserted in its Comments to Ameren Missouri's IRP, filed on February 28th. Grain Belt's Cross-Response also repeats certain comments of four of the Intervenors<sup>3</sup>, which echo Grain Belt's own comments.

6. These comments generally relate to the absence of any evaluation of the Grain Belt Express project or any evaluation of Kansas renewable generation resources in the IRP.

7. As discussed in Ameren Missouri's Response, Ameren Missouri has used generic cost and performance assumptions in its IRP as contemplated by 20 CSR 4240-22.040(1) and Ameren Missouri has not modeled specific projects in its IRP.<sup>4</sup> In Grain Belt's Cross-Response, Grain Belt asserts that this approach is hypocritical because Ameren Missouri modeled "other site-specific resources such as gas replacement at its Sioux and Labadie sites."<sup>5</sup> While Ameren Missouri has included specific sites for these generation projects as it already owns the land and has existing transmission interconnections for these sites, Ameren Missouri's analysis of these generation resources nonetheless uses generic cost and performance information.

8. Grain Belt's Cross-Response also asserts that Ameren Missouri has chosen not to remedy the alleged deficiencies discussed in Grain Belt's Cross-Response. As explained further in Ameren Missouri's Response, however, these alleged deficiencies do not meet the definition of a "deficiency" in 20 CSR 4240-22.020(9). In other words, Ameren Missouri is confident that these alleged deficiencies are not actually deficiencies, and that Ameren Missouri need not develop a remedy.

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<sup>3</sup> These four Intervenors include the Natural Resources Defense Council, Sierra Club, the Council for New Energy Economics, and Renew Missouri Advocates.

<sup>4</sup> "The utility shall collect generic cost and performance information sufficient to fairly analyze and compare each of these potential supply-side resource options . . . ."

<sup>5</sup> Grain Belt's Cross-Response at para 5, *citing* NRDC Comments at p. 16.

9. With regard to the other criticisms asserted in Grain Belt's Cross-Response, which are repetitive of the comments filed on February 27-28th, Ameren Missouri has now responded to each of these comments in its Response filed on June 11th.

10. Grain Belt has expressed, both in its pleadings and in verbal discussions with Ameren Missouri, great confidence that the Grain Belt project can compete with other wind generation projects within the MISO territory. Accordingly, Grain Belt should be willing to take its chances that its project will be selected during Ameren Missouri's IRP implementation process.

WHEREFORE, Ameren Missouri requests the Commission conclude that its September 26, 2023 IRP complies with the requirements of 20 CSR 4240-22, and acknowledge that Ameren Missouri's Preferred Resource Plan is reasonable.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon the parties listed on the official service list by e-mail on this 20th day of June, 2024.

**/s/ William D. Holthaus, Jr.**  
William D. Holthaus, Jr.