

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

In the Matter of Union Electric Company d/b/a       )  
Ameren Missouri’s Notice of a Change in its       )     File No. EO-2025-0235  
Preferred Resource Plan.                                       )

**GRAIN BELT EXPRESS LLC’s MOTION FOR ORDERING ADDING PARTIES OR, IN  
THE ALTERNATIVE, MOTION TO INTERVENE, AND MOTION TO ACCEPT  
REPLY TO MEMORANDUM**

COMES NOW Grain Belt Express LLC (“Grain Belt Express”), by and through counsel, and respectfully files this Motion for Order Adding Parties, or in the alternative, Motion to Intervene, and Motion to Accept Reply to Staff’s Memorandum. In support of its Motion, Grain Belt Express states as follows:

1. On February 13, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed a “Notice of Intention to Submit Notice and Supporting Materials Under 20 CSR 4240-22.080(12)” in its 2023 triennial integrated resource plan (“2023 Triennial IRP”) proceeding, File No. EO-2024-0020. The “Notice of Intention to Submit Notice and Supporting Materials” did not include any substantive information about Ameren’s changes to its acquisition strategy, the impact on the revenue requirement, performance measures, or rationale for the changes.

2. Thereafter, on February 28, 2025, in the instant proceeding, Ameren filed its “Notice of Change in Preferred Resource Plan,” but did not actually notice any of the parties to the 2023 Triennial IRP or the 2024 Annual Update (File No. EO-2025-0123). As justification for its change in Preferred Resource Plan (“PRP”), Ameren cited to a growth in data customer demand of 1.5 GW by 2032 and 2.5 GW by 2040, plus revisions to its customer energy efficiency and demand response programs under the provisions of the Missouri Energy Efficiency Investment Act.

3. On May 14, 2025, Staff of the Missouri Public Service Commission (“Staff”) filed its Memorandum regarding the change in PRP. On May 27, 2025, Grain Belt Express filed a Reply to Staff’s Memorandum.

4. By rule, when filing a change in PRP, Ameren must “serve notice on all parties to the most recent triennial compliance filing. The notification shall include a description of all changes to the preferred plan and acquisition strategy, the impact of each change on the present value of revenue requirement, and all other performance measures specified in the last filing pursuant to [20 CSR 4240-22.080] and the rationale for each change.” 20 CSR 4240-22.080(12). While Ameren filed a “Notice of Intention to Submit Notice and Supporting Materials Under 20 CSR 4240-22.080(12)” in the 2023 Triennial Filing, that filing did not include the substantive information required to be included by the Commission’s Rules. Accordingly, Ameren did not actually serve all parties to its last triennial proceeding with the notice and supporting materials that it promised, but instead submitted the notice and materials in an entirely new proceeding (the instant File No. EO-2025-0235).

5. Ameren’s approach is distinct from that of Evergy Missouri West, Inc. (“Evergy Missouri West”), which filed its Notice of Preferred Resource Plan Change in the same file as its most recent annual update.<sup>1</sup> The Commission then issued a Notice Regarding Filing, which stated, “Evergy Missouri West filed its notice in this existing case regarding its 2022 Integrated Resource Plan annual update filing. This notice of change is not a part of the annual update process and will be given a new file number. The Commission has removed the notice of change in preferred resource plan from EO-2022-0202 and placed it in a new file, EO-2023-0115. All further actions

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<sup>1</sup> Notice of Change in Plan, File No. EO-2022-0202 (Sept. 26, 2022).

regarding the notice of change will occur in the new file.”<sup>2</sup> All parties from the annual update file were included on the service list for the Commission’s Notice Regarding Filing.

6. To correct the lack of notice provided by Ameren, Grain Belt Express requests that the Commission issue an Order Adding Parties, similar to its Order Adding Parties in previous annual update proceedings.<sup>3</sup> In such Order, the Commission should add all parties to the 2023 Triennial IRP (File No. EO-2024-0020) to the instant proceeding.

7. Grain Belt Express recognizes that it filed its Reply to Staff’s Memorandum before being granted party status in the instant proceeding. Grain Belt Express filed its Reply within the default 10-day response deadline under 20 CSR 4240-2.080(13). Grain Belt Express did not have sufficient time to fully analyze the notice and party-status issues during the 10-day response timeframe and was instead focused on its substantive Reply. Now that Grain Belt Express has had the opportunity to analyze the notice and party-status issues, it respectfully requests that the Commission accept Grain Belt Express’ Reply despite it being filed before Grain Belt Express was granted party status. In light of Ameren’s failure to notice parties of its change in PRP, good cause exists to accept Grain Belt Express’ Reply

8. In the alternative, Grain Belt Express moves to intervene in this proceeding. The purpose of the Grain Belt Express Project is to provide access to regionally diverse supply side resources that Ameren is required to study in its IRP. Grain Belt Express was granted intervention in Ameren’s 2023 Triennial IRP because Grain Belt Express has a direct and immediate interest in Ameren’s IRP process and methodology. Grain Belt Express has the same direct and immediate

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<sup>2</sup> Notice Regarding Filing, File Nos. EO-2022-0202 and EO-2023-0115.

<sup>3</sup> See, e.g., Order Adding Parties, File No. EO-2025-0123 (Oct. 1, 2024).

interests in the instant docket. Accordingly, Grain Belt Express meets the requirements for intervention under 20 CSR 4240-2.075(3)(A).

9. 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).

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

WHEREFORE, Grain Belt Express respectfully requests that the Commission issue an Order Adding Parties. In the alternative, Grain Belt Express respectfully requests that the Commission grant Grain Belt Express' Motion to Intervene. In either the Order Adding Parties or the Order Granting Intervention, Grain Belt Express respectfully requests that the Commission also accept Grain Belt Express' Reply to Staff's Memorandum.

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 30<sup>th</sup> day of May 2025.

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