

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

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|--|---|-----------------------|
| In the Matter of Ameren Missouri’s 2023 |) | |
| Utility Resource Filing pursuant to 20 CSR |) | File No. EO-2024-0020 |
| 4240 – Chapter 22 |) | |

**AMEREN MISSOURI’S RESPONSE TO
GRAIN BELT EXPRESS LLC’S MOTION FOR COMMISSION ORDER ON
DEFICIENCIES AND CONCERNS**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and for its response to Grain Belt Express LLC’s (“GBx”) above-referenced Motion, states as follows:

I. PERTINENT CONTEXT AND HISTORY

1. GBx’s Motion should be considered against the backdrop of GBx’s posture in this docket. That posture is a developer with a very significant commercial interest in the ultimate supply-side resource decisions utilities like Ameren Missouri make and bring to the Commission for consideration in a CCN case. While not a party to this docket, GBx’s ultimate parent, Invenergy Renewables, LLC (“Invenergy”), also has a significant commercial interest in Ameren Missouri resource addition implementations since Invenergy has an interest in selling renewable energy resource projects it desires to develop in Kansas, and which would presumably be connected to the GBX line, to Ameren Missouri. To once again be clear: there is ***nothing inherently wrong*** with GBx’s and Invenergy’s commercial interests in having Ameren Missouri pick its investments for use in serving Ameren Missouri customers. However, that such commercial interests exist makes GBx quite different from most intervenors in IRP dockets, and that difference is relevant in evaluating the positions GBx is taking in this docket.¹

¹ While Ameren Missouri did not oppose GBx’s intervention in this docket, it could be argued that intervention in IRP dockets by what amounts to a potential vendor for the utility is not necessarily consistent with the purpose of an IRP docket. Cf., *Order Denying Late-Filed Application to Intervene*, File No. EO-2021-0021 (Apr. 21, 2021), where the Commission denied an application to intervene from prospective vendor, stating that the “purpose of the IRP process is to ensure that Missouri investor-owned utilities engage in a robust resource planning process . . . the

2. GBx's Motion should also be examined against the backdrop of what the Commission's role is, and is not, under the current IRP rule (which governs this docket) in terms of how it evaluates and processes a triennial IRP filing, especially given GBx's ongoing contention that its line and its affiliate's planned renewable energy resource investments are unique and superior to other resources Ameren Missouri might implement to meet its customers' needs. *See, e.g.,* ¶¶ 25-27 of GBx's Motion (touting benefits of GBx/Invernergy investments); Motion to Intervene of Grain Belt Express, LLC, File No. EA-2024-0237 (the Castle Bluff CCN docket, ¶ 8 (claiming GBx and related generation could in "many respects" serve Ameren Missouri's needs "better than [the Castle Bluff project]")).

3. GBx's Motion's central claim is clearly that Ameren Missouri has not sufficiently analyzed the GBx line (and the Invernergy renewables) and that if it had, the Company's Preferred Resource Plan would have called for acquisition of Kansas renewable energy resources delivered by the GBx high voltage direct current ("HVDC") line. As discussed in prior filings in this docket and further below, Ameren Missouri's analysis in this docket has fully complied with the requirements of the IRP rule, which do not require an analysis comparing a *specific project(s) in a specific location to generic resources*, but rather, require only that "generic cost and performance information" be collected.² But regardless of the debate over that point, Ameren Missouri *has* agreed to perform (and indeed *is performing it as we speak*) the very analysis that GBx claims should have been performed as part of this docket.³ If the analysis supports GBx's claims and appears to support a conclusion that renewables via the GBx line provide appropriate value for

purpose is not to authorize or compel a utility to purchase a particular product from a particular vendor." The Commission also pointed out that in an IRP, which is not a contested case, no "legal rights, duties, or privileges of specific parties are required to be determined after hearing."

² 20 CSR 4240-22.040(1).

³ GBx's Motion (¶ 9) reflects a portion of the agreement GBx and the Company reached in the Unanimous Stipulation and Agreement approved by the Commission in File No. EA-2024-0237 (EFIS Item No. 82 in that docket) (the "Castle Bluff Stipulation"). The full agreement appears in ¶ 5.h of the Castle Bluff Stipulation.

Ameren Missouri customers considering its costs, the Company expects to give GBx further consideration in terms of how it might contribute to meeting the needs of Ameren Missouri customers. Such an analysis is underway and will soon be completed and submitted in October, which was agreed upon as the appropriate time frame by both Ameren Missouri and GBx in the Castle Bluff Stipulation. This renders GBx's Motion moot.

4. Moreover, the Commission's role in a triennial IRP docket -- under the current IRP rule which applies to the present docket (the role will be different in certain respects once quadrennial IRPs under the Senate Bill No. 4 ("SB No. 4") changes begin) -- is not to require a utility to choose any particular preferred resource plan. *See, e.g., Report and Order*, File No. EO-2011-0271, pp. 9-10 ("[T]hat action [requiring the selection of a specific preferred resource plan] is not within the Commission's authority in *this* proceeding regarding compliance with the IRP rule" (emphasis in original)). The Commission goes on, in that order, to explain that if the utility adopts an imprudent resource plan, the Commission will address it appropriately in a future rate case, with the utility to bear the consequences of any imprudent decision-making.

5. The Company's 2023 Preferred Resource Plan and its 2025 Preferred Resource Plan both call for significant investments in wind and solar generation *post*-the date that (as discussed below) the GBx line may go into service, assuming it is finished on time or at all.⁴ The claims GBx has made principally involve questions of whether wind or solar energy delivered by GBx could obviate the Company's resource additions starting in 2030 and beyond, that is, its current plan (under its current Preferred Resource Plan), to add 2,100 MW of combined cycle natural gas capacity by 2032 (*See* GBX claimed Deficiency No. 1 (summarized at page 2 of GBX's Motion) and claimed GBX Concern Nos. 1 and 2, which primarily express concerns about future

⁴ 1,400 MW of wind and 1,300 MW of solar generation 2030 and beyond (2023 Preferred Resource Plan); 1,400 MW of wind and 750 MW of solar generation 2030 and beyond (2025 Preferred Resource Plan).

combined cycle generation⁵). As discussed further below, the Company will prepare and file an entirely new triennial IRP about 16 months from now (and indeed work on the new triennial IRP has already begun), and it will select a new preferred resource plan and evaluate other alternative resource plans as part of that filing. In addition, the Company will complete and file the above-referenced specific GBx analysis less than four months from now, which will also inform the 2026 triennial IRP filing and the question of what resources will be planned post-January 1, 2030 (the current date by which GBx says it will have the GBX HVDC line in operation). There is simply no need to further litigate GBx's claimed deficiencies in this docket, including no need to hold hearings in a docket about analyses underlying a Preferred Resource Plan that is no longer in effect (having been replaced with a new Preferred Resource Plan just over three months ago) and that will be replaced again in the Company's new triennial IRP, which will be filed about a year after the Company files the above-referenced GBx specific analysis.

6. One last point of context should be kept in mind. As earlier noted, GBx goes to great lengths to tout the (proposed) HVDC project's claimed ability to allow the delivery of energy from wind and solar resources that might someday exist to Ameren Missouri. The analysis that is underway will critically (and objectively) examine those claimed benefits, but those claimed benefits will not exist unless, and until, there is a GBx line in place. There remains uncertainty regarding whether and when that will happen, as borne out by the history of the GBx HVDC project. Specifically, in 2011, the Commission was advised that the then developer of the project had "made significant progress" on the project.⁶ The Commission was also previously told that the project was slated to begin construction in 2016 and to be complete in 2018,⁷ and then was told

⁵ GBx Comments, File No. EO-2024-0020, EFIS Item No. 53.

⁶ File No. EO-2011-0271 (Grain Belt Express Clean Line Energy's Comments on Ameren Missouri 2011 IRP, p. 2; EFIS Item No. 61).

⁷ File No. EA-2014-0207 (Grain Belt Express Clean Line Energy's Application for a CCN, p. 15; EFIS Item No. 5).

that it was planned for construction starting in 2018 and to be in service in 2021.⁸ Those timelines have long since come and gone. Most recently, the Commission was advised that construction is slated to start at the end of 2027 (for “Phase I” only), which presumably means Phase I would not be in service until perhaps the beginning of 2030.⁹ The line may be built and it may be built on-time (according to the latest schedule) but as discussed below, Ameren Missouri has needs that must be met before 2030, will file the above-referenced analysis this year, and will complete another triennial IRP filing next year. While Ameren Missouri agrees that Invenergy is a capable developer of renewable energy projects and is qualified to cause GBx to build the GBx line, until the line is done, it can meet no Ameren Missouri needs and certainly cannot meet needs that exist prior to its completion.

II. RESPONSE TO GBX’S SPECIFIC CLAIMS¹⁰

A. There is No Need for the Commission to “Act Now.”

7. GBx claims that the “Commission Must Act Now to Avoid Long-Term Harm.”¹¹ Underpinning its argument is GBx’s claim that the IRP rule requires that a specific project – the GBx HVDC line – and other specific projects – Kansas wind or solar projects that also do not exist and that depend on the HVDC line – must be evaluated under 20 CSR 4240-22.040 (GBx Claimed Deficiency No. 1).¹²

8. The cited rule reflects no such requirement. The rule requires that the utility utilize

⁸ File No. EA-2016-0358 (Grain Belt Express Clean Line’s Application for a CCN, p. 29; EFIS Item No. 1);

⁹ File No. EA-2023-0017 (Surrebittal Testimony of GBx witness Shashank Sane, p. 6; EFIS Item No. 163).

¹⁰ GBX’s claims are not new. Indeed, most of the arguments reflected in its Motion were made last year, as reflected in its filings in this docket. GBX’s filings last week largely simply rehashed old arguments. The Company addressed GBx’s contentions on June 20, 2024. See File No. EO-2024-0020, EFIS Item No. 70.

¹¹ GBx Motion, p. 7.

¹² The Company will not address GBx “concerns” in detail in this Response, having already addressed them in its filings made in this docket approximately one year ago. It should be noted that by definition, “concerns” cannot result in any non-compliance with the IRP rule since they only “may” prevent the utility’s resource acquisition from fulfilling the IRP rule’s objectives. 20 CSR 4240-22.020(6).

generic cost and performance information (e.g., generic wind costs, a generic net capacity factor for wind), not the claimed cost or performance of a specific HVDC line or a specific wind or solar plant GBx’s affiliate may or may not build.¹³ The implementation phase (*see* the definition of “implementation period” in the Commission’s IRP rule¹⁴) is where a specific project(s) would be evaluated against other specific projects. Comparison of specific renewable projects to generic renewable projects would not provide a fair and complete assessment of renewable projects that might potentially be available and that might be able to meet a part of the utility’s resource needs at a given point in time. Specific comparisons of that type can only be made during implementation, when the totality of the attributes for specific projects juxtaposed against specific needs can be compared. This includes cost, production profiles, deliverability, reliability characteristics, grid infrastructure needs, permitting requirements, and other attributes and risks specific to each individual project. As part of that implementation phase, the Company will bring specific projects and their specific attributes before the Commission in a CCN case for the Commission’s consideration, including evidence regarding the alternatives that were considered. It is at that point that specific projects are considered. Evaluation of generic projects in the IRP does not preclude consideration of specific projects during implementation.

9. Consequently, it is simply not true that the Commission must “act now” to avoid harm arising from this claimed deficiency. In less than four months – as expressly agreed to by GBx itself (and as approved by the Commission) -- Ameren Missouri will file an IRP-based analysis that does exactly what GBx insists must be done. That is, Ameren Missouri will conduct and file an analysis reflecting a comparison of not just generic information on wind and solar resources in MISO generally but that reflects such information for *Kansas* wind and solar that, if

¹³ 20 CSR 4240-22.040(1).

¹⁴ 20 CSR 4.240-22.020(25).

built, could presumably connect to the GBx line. While for the reasons discussed above the *IRP rule* does not require such a comparison, GBx seeks to litigate an issue that is moot in any event because *the analysis will be done and filed by October 1 of this year*. Moreover, not only will such information on Kansas wind and solar be included in the analysis, but so too will “firm delivery costs” via the GBx line – that GBx itself has provided Ameren Missouri.¹⁵

10. There is also no need for the Commission to “act now” arising from GBx’s claimed Deficiency No. 2, whereby GBx claims that the Company did not consider certain siting and permitting costs associated with interconnecting MISO generation. First, as is the case with claimed Deficiency No. 1, the analysis to be submitted by October 1 of this year is required to (and will) “include realistic assumptions regarding generation tie line costs and affected system costs.”¹⁶ Regardless, that such assumptions were not included in the 2023 triennial IRP analysis was not a deficiency given that the Commission granted the Company a waiver of the rule provision relating to such costs.¹⁷ As discussed in its June 11, 2024, Response to Alleged Deficiencies and Concerns,¹⁸ while the Company will comply with the Castle Bluff Stipulation in this regard, there are limitations on conclusions that can be drawn from such assumptions. Those limitations exist because it is not possible to determine with a high degree of accuracy what these costs would be for a specific project (including location) until interconnection studies are complete for such a project at such a location at a specific point in time so that the actual effect on the dynamic transmission system can be determined at that time. But in any event, there is nothing

¹⁵ GBx provided a range of such costs, which will be used in the analysis, as the Castle Bluff Stipulation contemplates.

¹⁶ Castle Bluff Stipulation, supra.

¹⁷ *Order Granting Variances*, File No. EE-2023-0021, EFIS Item No. 7.

¹⁸ EFIS Item No. 68.

for the Commission to "act now" about, and it can consider the impact of such assumptions on the analysis to be submitted later this year once that analysis is complete.

11. Finally, there is also no need for the Commission to “act now” based on GBx’s claimed Deficiency No. 3, relating to GBx’s complaint that Ameren Missouri “did not recognize Grain Belt Express as an advanced system technology.” First, GBx points to no provision of the IRP rule that requires utilities to consider any specific advanced technology and there is thus not a “deficiency.” Second, exactly what should be considered when it comes to the GBx project itself is at best unclear since exactly what GBx is proposing has not been clear and either has, or could still be, evolving. That this is the case is evidenced by the fact that the technology GBx entered into the MISO queue is *different* than the technology GBx, it appears, actually intends to implement if the project is built. Regardless, as part of the analysis the Company will file by October 1 of this year, the Company has specifically agreed to “weigh the reliability, resiliency and operational benefits of the HVDC transmission facilities themselves, including but not limited to those outlined in Exhibit 11, Schedule AP-2, Section 6 "Operational Improvement Value of HVDC Resources" in Docket No. EA-2023-0017.”¹⁹ Consequently, there is nothing on this point on which the Commission must “act now” because the Company will indeed be doing, in the very near-term, what GBx claims the IRP rule requires.

12. Another basis for the claim that the Commission must “act now” arises from a mischaracterization of the impact of SB No. 4 on the Company’s ongoing resource planning activities and requirements. Contrary to the impression GBx’s Motion gives, the enactment of SB No. 4’s prospective changes to the resource planning process does not mean that Ameren Missouri will not continue to engage in robust resource planning. Nor does it mean that the Commission

¹⁹ Castle Bluff Stipulation, supra.

will not continue to examine those resource plans, Ameren Missouri's compliance with the existing IRP rule, and indeed as part of the CCN process, requires the Commission to examine the propriety of any resources Ameren Missouri proposes to add. On the contrary, although it is true that Ameren Missouri likely would not file a new *quadrennial* IRP under the new SB No. 4 process before 2029, as earlier noted, Ameren Missouri will file another full-blown *triennial* IRP just 16 months from now under the *existing* IRP rule. Moreover, Ameren Missouri will file an Annual Update by October 1, of this year, including the GBx specific analysis referenced above and will file additional Annual Updates and address Special Contemporary Issues ordered by the Commission each year between its triennial (and eventually quadrennial) IRP filings. There is nothing in SB. No. 4 that warrants, let alone requires, that the Commission "act now" for claimed deficiencies that the analysis to be filed this year addresses, especially since the claimed deficiencies concern a Preferred Resource Plan that is no longer in effect, and that, in any event, will again be replaced in another full-blown triennial IRP to be filed less than 16 months from now.

B. The "Modest Relief" GBx's Motion Seeks Has Already Been Afforded.

13. Amongst the nearly 15 pages GBx takes to accuse the Company of having filed a deficient triennial IRP, and then to accuse the Company of not "working towards its 2025 Annual Update,"²⁰ GBx states that the relief it seeks is "modest," that is, that all it wants is for Ameren Missouri to simply "collect generic cost and performance data from Kansas wind and solar resources that will be delivered by Grain Belt Express and incorporate that cost and performance data into its IRP."²¹ GBx received that relief about seven months ago, when it and the Company agreed upon exactly what will be done, and further agreed that the time and place for including its

²⁰ GBX Motion, p. 5

²¹ GBx Motion, p. 13

results would be in Ameren Missouri's Annual Update, as provided for in the Castle Bluff Stipulation: "In its next annual integrated resource planning ("IRP") update (currently anticipated to be filed October 1, 2025), Ameren Missouri will [conduct the study/analysis as agreed]..." Given that GBx is getting the relief it seeks, it is unclear why GBx chose to file its Motion and other pleadings in the new Preferred Resource Plan dockets now to advocate for a result it is already getting – and to ask the Commission to unnecessarily entertain additional litigation and thereby unnecessarily consume additional Company, Commission, and Staff resources and hearing time.

C. Ameren Missouri Continues to Plan, and to Identify Resources it Needs Now and in the very Near-Term, Irrespective of the Fulfillment of Post-2029 Needs GBx Might or Might Not Contribute To.

14. GBx's Motion implies that Ameren Missouri should have completed the analysis it and the Company agreed to sooner than October 1 of this year or should have somehow engaged with GBx in a more substantive manner sooner. GBX is wrong, for several reasons.

15. First, by the express terms of the agreement with GBx in the Castle Bluff Stipulation, the analysis was always due October 1 of this year. Second, while the GBx HVDC project is undoubtedly the most important task on GBx's plate, Ameren Missouri could not turn its attention to that analysis until recently because it (and specifically its resource planning team), post-resolution of the Castle Bluff CCN docket, had other more pressing tasks on its plate in order to properly discharge both its regulatory and service obligations. Specifically, post resolution of the Castle Bluff case, Ameren Missouri: (a) had significant responsibilities relating to the MEEIA 4 docket, the resolution of which in turn immediately and materially affected its resource planning, (b) had significant responsibilities to simultaneously address the impact of the rapidly emerging, significant, and indeed extraordinary requests for service to new load on its system (see File No.

ET—2025-0184, involving a request for new tariff terms to address near term service requests for approximately 2 gigawatts of new load, and potentially far more than 2 gigawatts in the intermediate- longer term), and (c) had the responsibility to assess the appropriateness of its then-current Preferred Resource Plan given the developments described in (a) and (b) above and, if a change to the Plan needed to be made, the obligation to timely inform the Commission within 60 days, along with filing the significant information required by the IRP rule associated with its new Preferred Resource Plan.

16. As far as substantively engaging with GBx, while Ameren Missouri will do so to the extent necessary or appropriate to perform and file the analysis it agreed to conduct, there is nothing in the Castle Bluff Stipulation that obligates Ameren Missouri to do anything other than conduct and submit the agreed-upon analysis. Moreover, Ameren Missouri has twice met with GBx (at GBx's request) to touch base on the analysis.²² Ameren Missouri informed GBx on both occasions that its other responsibilities (see above) meant that it would not complete the analysis until later this year, but Ameren Missouri has always been clear that it would timely complete it. Having completed the required steps to change its Preferred Resource Plan and having initiated File No. ET-2025-0184, Ameren Missouri has indeed retained expert consulting assistance that it needs to complete the required analysis, and the analysis work is now under way. Indeed, the morning of the day on which GBx filed its Motion (that is, before GBx filed it later that afternoon), Ameren Missouri informed GBx that it *would be* in a position to have more substantive discussions with GBx about the analysis in June – see email exchange between the undersigned counsel and GBx's counsel attached hereto as Exhibit A. Regardless, the analysis is proceeding and will be timely completed and filed, as agreed.

²² Meeting virtually in both March and May of this year.

WHEREFORE, Ameren Missouri requests that the Commission deny the relief GBx's Motion seeks and, alternatively, that if the Commission desires to issue a final order in this docket under 20 CSR 4240-22.080(16), that it determine that the September 26, 2023, triennial IRP complies with the requirements of 20 CSR 4240-22.

Respectfully submitted,

/s/ James B. Lowery
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**Attorneys for Union Electric Company
d/b/a Ameren Missouri**

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 6th day of June, 2025.

/s/ James B. Lowery

James B. Lowery

From: [Jim Lowery](#)
To: [Andrew Schulte](#); [Anne Callenbach](#)
Cc: [Tatro, Wendy](#)
Subject: RE: Castle Bluff Stipulation
Date: Tuesday, May 27, 2025 9:09:00 AM

Good Morning:

Ameren thinks it will be in a position to touch base with Invenergy/GBX on this topic on either June 24 (can make anytime work but if possible would like to try to avoid 1-2:30 or 3-4) or June 26 (anytime that day starting at Noon). Can one of those dates/times work?

From: Jim Lowery
Sent: Tuesday, April 29, 2025 11:30 AM
To: Andrew Schulte <ASchulte@Polsinelli.com>; Anne Callenbach <ACallenbach@Polsinelli.com>
Cc: Tatro, Wendy <WTatro@ameren.com>
Subject: RE: Castle Bluff Stipulation

Andrew:

I've been able to check-in with folks. We don't think we will have anything around these topics by any of the dates you have suggested. However, we think we probably could have such a discussion in June, maybe the first half of June. How about we reach out to you later in May and suggest some dates?

From: Andrew Schulte <ASchulte@Polsinelli.com>
Sent: Friday, April 18, 2025 11:46 AM
To: Jim Lowery <lowery@jblawllc.com>; Anne Callenbach <ACallenbach@Polsinelli.com>
Cc: Tatro, Wendy <WTatro@ameren.com>
Subject: RE: Castle Bluff Stipulation

Thanks, Jim. Have a good weekend.

Andrew

From: Jim Lowery <lowery@jblawllc.com>
Sent: Friday, April 18, 2025 7:58 AM
To: Andrew Schulte <ASchulte@Polsinelli.com>; Anne Callenbach <ACallenbach@Polsinelli.com>
Cc: Tatro, Wendy <WTatro@ameren.com>
Subject: RE: Castle Bluff Stipulation

EXTERNAL EMAIL lowery@jblawllc.com

Andrew

I do have this question out to our folks but have not heard back. Will ping them again next week. One of the key folks is out of the office until Tuesday.

From: Andrew Schulte <ASchulte@Polsinelli.com>

Sent: Monday, April 14, 2025 11:51 AM

To: Jim Lowery <lowery@jblawllc.com>; Anne Callenbach <ACallenbach@Polsinelli.com>

Cc: Tatro, Wendy <WTatro@ameren.com>

Subject: RE: Castle Bluff Stipulation

Jim – Following up on the meeting windows listed below. Will any of those work for Ameren, and if not, can you please provide some alternatives?

Thanks,

Andrew Schulte

aschulte@polsinelli.com

816.691.3731 (o) 785.760.3939 (m)

From: Andrew Schulte

Sent: Tuesday, April 8, 2025 1:08 PM

To: 'Jim Lowery' <lowery@jblawllc.com>; Anne Callenbach <ACallenbach@Polsinelli.com>

Cc: Tatro, Wendy <WTatro@ameren.com>

Subject: RE: Castle Bluff Stipulation

Jim,

Upon review, schedule AP-2 is entirely public, so no need to be concerned with confidentiality obligations, at least as they relate to that Schedule. But we appreciate the caution.

Based on my notes from our meeting on March 11, Ameren is developing responses to the following questions in advance of another meeting between Grain Belt and Ameren to be scheduled for May. The Grain Belt team is available May 7 (2-4 PM), May 8 (9-11 AM), May 12 (9:30-11 AM), May 15 (9-Noon). Please let us know if any of those windows work for Ameren, so we can put something on the calendar.

1. What assumptions is Ameren using for generic Kansas wind and solar?
2. Confirming Ameren will use the same base year for cost and inflation assumptions between the KS generic resources and MISO side resources.
3. What assumptions is Ameren using for generation tie line and affected system costs for MISO resources?
4. What Ameren will use and/or how Ameren is thinking about the "reliability, resiliency and operational benefits of the high voltage direct current transmission facilities" as outlined in the Guidehouse report Grain Belt filed in its CCN proceeding, reattached for convenience?

Thanks,

Andrew Schulte

aschulte@polsinelli.com

816.691.3731 (o) 785.760.3939 (m)

From: Jim Lowery <lowery@jblawllc.com>

Sent: Monday, April 7, 2025 10:01 AM

To: Andrew Schulte <ASchulte@Polsinelli.com>; Anne Callenbach <ACallenbach@Polsinelli.com>

Cc: Tatro, Wendy <WTatro@ameren.com>

Subject: Castle Bluff Stipulation

EXTERNAL EMAIL lowery@jblawllc.com

Andrew, Anne:

As Ameren weighs the reliability, resiliency, operational benefits of HVDC resources – including those outlined in Petti's Schedule AP-2 – it will be assisted by a consultant to whom Ameren will need to provide that report. Since it was marked Confidential in your CCN case, I just wanted to give you this heads-up to let you know that Ameren will place the consultant under appropriate confidentiality obligations to maintain the report's confidentiality, and itself will continue to treat it as such.

Jim Lowery | JBL LAW, LLC

9020 S. Barry Road, Columbia, MO 65201

(ofc) 573-476-0050 | (cell) 573-999-2081 | lowery@jblawllc.com

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