

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

In the Matter of Ameren Missouri's 2023	)	
Utility Resource Filing pursuant to 20 CSR	)	File No. EO-2025-0235
4240 – Chapter 22	)	

**AMEREN MISSOURI'S RESPONSE TO  
GRAIN BELT EXPRESS LLC'S MAY 27 AND  
MAY 30 FILINGS IN THIS DOCKET**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and for its Response to Grain Belt Express LLC's ("GBx") Reply to Staff's Memorandum Regarding Ameren Missouri's Change in Preferred Resource Plan ("May 27 Filing") and GBx's Motion for Ordering Adding Parties or, in the Alternative, Motion to Intervene, and Motion to Accept Reply Memorandum ("May 30 Filing"), states as follows:

1. GBX's May 27 Filing is largely a rehash of points and arguments it made in a motion filed on the same date in File No. EO-2024-0020. Concurrently with this filing, Ameren Missouri has filed a Response to GBX's motion ("Company's EO-2024-0020 Response") in that docket and for the Commission's convenience, attaches it to this filing as Exhibit 1 hereto.

2. GBX's May 27 Filing does make one separate and distinct point relating to the near-term CCN cases the Company intends to initiate.<sup>1</sup> As discussed in the Company's EO-2024-0020 Response, the Company continues to engage in ongoing resource planning, and has near-term resource needs that exist well before the GBx HVDC line, and any associated renewables Invenergy may develop to connect to it, could be online. The Company cannot wait and see if the GBx project actually comes to fruition and if it does, whether that happens on the schedule GBx has last indicated applies. As the 2025 Preferred Resource Plan filing outlines, the Company's near-term supply-side resource needs arise quite soon, starting next year and increasing year-by-

---

<sup>1</sup> May 27 Filing, para. 8.

year through the remainder of the decade. Consequently, the Company will indeed soon seek permission to add additional resources, all of which would go into operation in 2028. If the analysis the Company will submit later this year supports further consideration of the GBx line and associated renewables, then GBx and such renewables can be considered in Ameren Missouri's ongoing and prescribed resource planning activities (including in its upcoming 2026 triennial IRP filing). And in those near-term CCN cases, the Commission will of course make its own determination regarding whether the resources the Company proposes should be approved, as it always does.

3. With respect to GBX's May 30 Filing, GBx is correct that Ameren Missouri did not formally serve the parties to its most recent triennial IRP docket (File No. EO-2024-0020). Ameren Missouri apologizes for the oversight. However, no such party could have been prejudiced by the oversight insofar as each such party was served with the Company's February 13, 2025 *Notice of Intention to Submit Notice and Supporting Materials Under 20 CSR 4240-22.080(12)*, which indicated the Company would soon file a notice that the Company was changing its Preferred Resource Plan.

4. In its May 30 Filing, GBx requests that the Commission add the parties to the 2023 triennial IRP filing to this docket. While the Company will not oppose that request, it should be noted that the IRP rule does not require or even allow the Commission to act in some way upon Ameren Missouri's notice that it changed its Preferred Resource Plan. See *Report and Order*, File No. EO-2011-0271, p. 11 ("There is no provision in the Commission's IRP rules that would require, or allow, the Commission to accept, reject, or in any way act upon Ameren Missouri's notice of its adoption of a new preferred resource plan."). However, making the parties to the

triennial IRP parties this docket will ensure that they receive an EFIS notice of any activity that could occur in this docket, and Ameren Missouri has no objection to GBx's request.

WHEREFORE, Ameren Missouri requests that the only action the Commission take in this docket is to grant GBx's request that parties to File No. EO-2024-0021 be made parties to this case.

Respectfully submitted,

/s/ James B. Lowery

**James B. Lowery**, #40503

JBL Law, LLC

9020 S. Barry Road

Columbia, MO 65201

573-476-0050

[lowery@jblawllc.com](mailto:lowery@jblawllc.com)

**Wendy K. Tatro**, #60261

Director & Assistant General Counsel

Ameren Missouri

1901 Chouteau Avenue, MC 1310

St. Louis, MO 63103

(314) 861-1705 (phone)

(314) 554-4014 (fax)

[wtatro@ameren.com](mailto:wtatro@ameren.com)

**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

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

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.<sup>1</sup>

1 While Ameren Missouri did not oppose GBx’s intervention in this docket, it could be argued that intervention in  
 2 IRP dockets by what amounts to a potential vendor for the utility is not necessarily consistent with the purpose of an  
 3 IRP docket. *Cf., Order Denying Late-Filed Application to Intervene*, File No. EO-2021-0021 (Apr. 21, 2021),  
 4 where the Commission denied an application to intervene from prospective vendor, stating that the “purpose of the  
 5 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/Invenenergy 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 Invenenergy 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.<sup>2</sup> 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.<sup>3</sup> 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."

<sup>2</sup> 20 CSR 4240-22.040(1).

<sup>3</sup> 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.<sup>4</sup> 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

---

<sup>4</sup> 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 generation<sup>5</sup>). 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.<sup>6</sup> The Commission was also previously told that the project was slated to begin construction in 2016 and to be complete in 2018,<sup>7</sup> and then was told

---

<sup>5</sup> GBx Comments, File No. EO-2024-0020, EFIS Item No. 53.

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

<sup>7</sup> 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.<sup>8</sup> 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.<sup>9</sup> 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 CLAIMS<sup>10</sup>**

### **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.”<sup>11</sup> 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).<sup>12</sup>

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

---

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

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

<sup>10</sup> 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.

<sup>11</sup> GBx Motion, p. 7.

<sup>12</sup> 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.<sup>13</sup> The implementation phase (*see* the definition of “implementation period” in the Commission’s IRP rule<sup>14</sup>) 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

---

<sup>13</sup> 20 CSR 4240-22.040(1).

<sup>14</sup> 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.<sup>15</sup>

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.”<sup>16</sup> 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.<sup>17</sup> As discussed in its June 11, 2024, Response to Alleged Deficiencies and Concerns,<sup>18</sup> 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

---

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

<sup>16</sup> Castle Bluff Stipulation, supra.

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

<sup>18</sup> 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.”<sup>19</sup> 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

---

<sup>19</sup> 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,"<sup>20</sup> 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."<sup>21</sup> 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

---

<sup>20</sup> GBX Motion, p. 5

<sup>21</sup> 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.<sup>22</sup> 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.

---

<sup>22</sup> 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  
**James B. Lowery**, #40503  
JBL Law, LLC  
9020 S. Barry Road  
Columbia, MO 65201  
573-476-0050  
[lowery@jblawllc.com](mailto:lowery@jblawllc.com)

**Wendy K. Tatro**, #60261  
Director & Assistant General Counsel  
Ameren Missouri  
1901 Chouteau Avenue, MC 1310  
St. Louis, MO 63103  
(314) 861-1705 (phone)  
(314) 554-4014 (fax)  
[wtatro@ameren.com](mailto:wtatro@ameren.com)

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

Thanks, Jim. Have a good weekend.

Andrew

---

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

**EXTERNAL EMAIL** [lowery@jblawllc.com](mailto: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](mailto:ASchulte@Polsinelli.com)>

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

**To:** Jim Lowery <[lowery@jblawllc.com](mailto:lowery@jblawllc.com)>; Anne Callenbach <[ACallenbach@Polsinelli.com](mailto:ACallenbach@Polsinelli.com)>

**Cc:** Tatro, Wendy <[WTatro@ameren.com](mailto: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](mailto: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](mailto:lowery@jblawllc.com)>; Anne Callenbach <[ACallenbach@Polsinelli.com](mailto:ACallenbach@Polsinelli.com)>

**Cc:** Tatro, Wendy <[WTatro@ameren.com](mailto: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](mailto:aschulte@polsinelli.com)

816.691.3731 (o) 785.760.3939 (m)

---

**From:** Jim Lowery <[lowery@jblawllc.com](mailto:lowery@jblawllc.com)>

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

**To:** Andrew Schulte <[ASchulte@Polsinelli.com](mailto:ASchulte@Polsinelli.com)>; Anne Callenbach <[ACallenbach@Polsinelli.com](mailto:ACallenbach@Polsinelli.com)>

**Cc:** Tatro, Wendy <[WTatro@ameren.com](mailto:WTatro@ameren.com)>

**Subject:** Castle Bluff Stipulation

---

**EXTERNAL EMAIL** [lowery@jbllawllc.com](mailto:lowery@jbllawllc.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@jbllawllc.com](mailto:lowery@jbllawllc.com)

---

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

---