

**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 REPLY TO AMEREN MISSOURI'S JUNE 6
RESPONSE**

COMES NOW Grain Belt Express LLC ("Grain Belt Express"), by and through counsel, and respectfully files this Reply to Ameren's Missouri's June 6 Response. In support of its Reply, Grain Belt Express states as follows:

1. On June 6, 2025, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed a Response to Grain Belt Express LLC's May 27 and May 30 Filings ("June 6 Response") in this proceeding.

2. Also on June 6, 2025, in File No. EO-2024-0020 ("2023 Triennial IRP File"), Ameren filed a Response to Grain Belt Express LLC's Motion for Commission Order on Deficiencies and Concerns ("Triennial IRP Response").

3. In its June 6 Response in this proceeding, Ameren acknowledged that it violated the notice requirements in the IRP Rules administered by the Missouri Public Service Commission ("Commission") and did not oppose the relief sought by Grain Belt Express in its May 30 Motion, which is to add the parties to the 2023 Triennial IRP to this File.¹

4. Also in its June 6 Response in this proceeding, Ameren argued 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."² In addition to highlighting an extraordinary loophole

¹ June 6 Response, ¶¶ 3-4.

² June 6 Response, ¶ 4.

in the Commission's current IRP Rules, Ameren's argument underscores the need for the Commission to issue a substantive ruling in the 2023 Triennial IRP File.

5. Grain Belt Express' May 27 Filing in this proceeding noted, "[b]ecause the same deficiencies are present in Ameren's 2025 PRP, the relief requested in File No. EO-2024-0020 will have the effect of also addressing the issues in this proceeding (File No. EO-2025-0235)." Accordingly, Grain Belt Express directs the Commission's attention to its Motion for Commission Order on Deficiencies and Concerns and its subsequent Reply (filed concurrently herewith) in the 2023 Triennial IRP File. Grain Belt Express urges the Commission to resolve the outstanding deficiencies with Ameren's approach to integrated resource planning in the 2023 Triennial IRP File, as it is empowered and required to do.

WHEREFORE, Grain Belt Express respectfully requests that (1) Commission add the parties to the 2023 Triennial IRP File to this proceeding, and (2) refer to Grain Belt Express' Motion and Reply in File No. EO-2024-0020 and grant the relief sought therein and for any such further relief as the Commission may deem just and reasonable.

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 16th day of June 2025.

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