

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

In the Matter of Union Electric Company, d/b/a)	
Ameren Missouri, for Permission and Approval)	File No. EA-2025-0238
and Certificates of Public Convenience and)	
Necessity Authorizing it to Construct a New)	
Generation Facility and Battery Energy Storage)	
System Facility.)	

GRAIN BELT EXPRESS LLC APPLICATION TO INTERVENE

COMES NOW Grain Belt Express LLC (“Grain Belt Express”), by and through counsel, pursuant to Commission Rule 4 CS 4240-2.075, and respectfully files its Application to Intervene in this proceeding before the Missouri Public Service Commission (“Commission”). In support of its Application to Intervene, Grain Belt Express states as follows:

1. On March 3, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed a Notice with the Commission indicating its intent to file for a certificate of convenience and necessity (“CCN”) for new generation assets. Ameren Missouri subsequently filed its CCN application and supporting testimony on June 26, 2025, requesting Commission approval to build an 800 MW multi-unit simple cycle natural gas electric generation facility with fuel oil backup capability at the former site of its coal-fired Rush Island Energy Center. Ameren Missouri’s application also seeks Commission approval of a 400 MW battery storage facility to be built on the Rush Island site.

2. On July 1, 2025, the Commission issued an order requiring entities that wished to intervene to file their applications for intervention by July 21, 2025.

3. Grain Belt Express is a limited liability company (“LLC”) organized under the laws of the State of Indiana. Grain Belt Express was formed in 2010 as a Delaware LLC and converted

to an Indiana LLC in February 2013. Grain Belt Express' principal offices are located at One South Wacker Drive, Suite 1800, Chicago, IL 60606.

4. Grain Belt Express is an electrical corporation and public utility regulated by this Commission. Grain Belt Express holds a certificate of convenience and necessity ("CCN") pursuant to Section 393.170.1 RSMo., as determined by the Commission's March 20, 2019 Report & Order on Remand in File No. EA-2016-0358, as amended by the Commission's October 12, 2023 Report and Order in File No. EA-2023-0017, to construct, install, own, operate, maintain, and otherwise control and manage an approximately 800-mile, overhead, multi-terminal ± 600 kilovolt ("kV") high-voltage, direct current ("HVDC") transmission line and associated facilities including converter stations and alternating current ("AC") connector lines (the "Grain Belt Express Project").

5. In File No. EA-2024-0017, the Commission found that the Grain Belt Express Project is needed and in the public interest for numerous reasons:

- a. "[T]he Project is needed for reliability and resiliency of the grid and for national security. And by increasing the size of the transmission capacity and adding the Tiger Connector, including moving the converter station and AC line, the Project will bring the interconnectivity to multiple regions to improve the reliability and resiliency of the grid for Missourians and in the interest of national security. This will help guard against price spikes and outages such as those experienced by Winter Storm Uri and Elliot."¹
- b. "The evidence in the case demonstrated that the Project will create both short-term and long-term benefits to ratepayers and all the citizens of the state."²
- c. "There can be no debate that our energy future will require more diversity in energy resources...."³

¹ File No. EA-2023-0017, Report & Order, p. 56 (Oct. 12, 2023).

² *Id.* at p. 63.

³ *Id.*

- d. “The energy on the Project provides great promise as a source for affordable, reliable, safe ... energy that will increase resiliency of the grid.”⁴

6. In addition to the undersigned counsel, correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to:

Nicole Luckey
Senior Vice President
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
nluckey@invenergy.com

Kevin Chandler
Director, Transmission Business
Development
Grain Belt Express LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606
kchandler@invenergy.com

7. Grain Belt Express seeks to participate in this matter to evaluate the evidence produced in this proceeding and challenge through its own evidence, if necessary, Ameren’s assertions that this new certificate of convenience and necessity fully meets the requirements of the *Tartan* Factors, is a prudent investment, and is part of a lowest cost generation supply portfolio. As further described below, Grain Belt Express has direct and immediate interests in this proceeding that are not currently represented in this matter. Accordingly, Grain Belt Express meets the requirements for intervention under 20 CSR 4240-2.075(3)(A).

8. The Commission previously granted intervention to Grain Belt Express in related proceedings, including File No. EO-2024-0020 (Ameren’s 2023 Triennial Integrated Resource Plan (“IRP”) proceeding) and File No. EA-2024-0237 (Ameren’s CCN application for the Castle

⁴ *Id.* at pp. 63-64

Bluff Project). Grain Belt Express also has an unopposed, pending Motion for Order Adding Parties, or in the Alternative, Motion to Intervene in File No. EA-2025-0235 (Ameren's Notice of Change in its Preferred Resource Plan).

9. On May 27, 2025, Grain Belt Express filed a Motion for Commission Order on Deficiencies and Concerns in File No. EO-2024-0020, Ameren's 2023 IRP proceeding, along with a companion filing in File No. EO-2025-0235, Ameren's Preferred Resource Plan proceeding. These filings (which remain pending) reiterated the noted deficiencies and concerns with Ameren's 2023 IRP Grain Belt Express first noted in its February 28, 2024 comments in Ameren's 2023 IRP proceeding, which have never been resolved and upon which the Commission has not yet issued the Order required pursuant to Rule 20 CSR 4240-22.080(16). At a high level, the deficiencies identified by Grain Belt Express relate to Ameren's failure to evaluate the reliability and resiliency benefits associated with geographically diverse, uncorrelated generating assets located outside of the MISO region, as well as the reliability benefits associated with the line itself (as an HVDC, interregional transmission line with bidirectional capability). In Grain Belt Express's view, the line and the generation it will enable are a one-of-a-kind reliability and capacity resource and any newly proposed local Missouri generating facility should be appropriately measured against it, as the IRP rules require.

10. In this proceeding, Ameren relies heavily on its deficient Preferred Resource Plan to support the need for a new 800 MW multi-unit simple cycle natural gas electric generation facility.⁵ Ameren's continued reliance on its deficient Preferred Resource Plan directly impacts Grain Belt Express, since the Grain Belt Express Project can deliver directly into Ameren's service

⁵ See, e.g., Application at ¶ 11; Direct Testimony of Ajay K. Arora, pp. 13-17; Direct Testimony of Matt R. Michaels, Section III.

territory the uncorrelated generating resources that Ameren has failed to study. Accordingly, Grain Belt Express' unique interests in this case are well-established.

11. Granting Grain Belt Express' intervention would serve the public interest by allowing its insight, expertise, and experience to contribute to the process and to ensure a comprehensive record in this case. This is especially true considering Grain Belt Express' familiarity with Ameren's Preferred Resource Plan and the positions that Grain Belt Express has taken in related proceedings, as discussed above. Accordingly, Grain Belt Express also meets the requirements for intervention under 20 CSR 4240-2.075(3)(B).

12. Regarding the statement required by 20 CSR 4240-(2)(F), Grain Belt Express has not yet taken a position specific to the issues raised by Ameren's CCN application and supporting witness testimony in this case, but asserts that it should be able to take a position in responsive testimony after review of discovery and additional information to be adduced in this proceeding.

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

WHEREFORE, Grain Belt Express respectfully requests the Commission grant its Application to Intervene in the above-captioned matter with full rights of participation.

Respectfully submitted,

/s/ Anne E. Callenbach

Anne E. Callenbach MBN 56028
Andrew O. Schulte MBN 62194
Sean Pluta MBN 70300
Jared Jevons MBN 75114
Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, Missouri 64112
(816) 572-4754

acallenbach@polsinelli.com
aschulte@polsinelli.com
spluta@polsinelli.com
jjevons@polsinelli.com

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 21st day of July 2025.

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