

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

In the Matter of the Application of Union Electric)	
Company, d/b/a Ameren Missouri, for Permission and)	
Approval and Certificate of Public Convenience and)	File No. EA-2024-0237
Necessity Authorizing it to Construct a Simple Cycle)	
Natural Gas Generation Facility.)	

AMEREN MISSOURI’S REQUEST FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company") and requests a variance from certain provisions of the October 17, 2024, Unanimous Stipulation and Agreement ("Stipulation") approved by the Missouri Public Service Commission ("Commission") in this proceeding. In support of its position, the Company states as follows:

1. The Stipulation approved in this matter by the Commission on October 30, 2024, included certain provisions related to projects requested by Grain Belt Express, LLC ("Grain Belt") that required Ameren Missouri to include certain studies in its 2025 Annual Integrated Resource Planning ("IRP") Update. In particular, the agreement at Paragraph 5.h provides:

In its next annual integrated resource planning ("IRP") update (currently anticipated to be filed by October 1, 2025), Ameren Missouri will run its IRP model and report on the results with Kansas wind and solar included as a supply-side resource, using data for generic Kansas wind and solar resources, plus an ownership and delivery cost based on discussions between Ameren Missouri and Grain Belt Express. If a firm delivery cost cannot be provided by Grain Belt, Ameren Missouri will use a range of delivery costs to account for uncertainties in what the actual ownership and delivery costs may be, as determined by the parties. A firm delivery cost shall be provided by Grain Belt within 30 days of a final Commission Order in this proceeding or, if such a firm delivery cost cannot be provided within such time frame, a range will be provided by Grain Belt Express within that time frame. The estimated delivery cost for Kansas supply-side resources should reflect the same base year for cost and inflation assumptions as the estimated delivery cost of MISO supply-side resources. Further, the estimated delivery cost of MISO supply-side resources should include realistic assumptions regarding generation tie line costs and affected system costs. Either in its supply side resource analysis or in its assessment of alternative resource plans, Ameren Missouri shall also 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.

2. While this study has been completed, Ameren Missouri is providing Grain Belt an opportunity to review the study before it is filed with the IRP Annual Update. Grain Belt has indicated that it does not object to a delay in filing this analysis. Accordingly, the Company requests a variance to allow an additional 30 days to submit this portion of the 2025 Annual IRP Update. The remainder of the update is being submitted on September 30, 2025, as previously planned.

WHEREFORE, the Company respectfully requests that the Commission grant Ameren Missouri until October 30, 2025, to submit the study anticipated in the Stipulation in this case which is described above in its 2025 Annual IRP Update.

Respectfully Submitted,

/s/ Paula N. Johnson

Paula N. Johnson, Mo. Bar #68963

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ATTORNEY FOR UNION ELECTRIC

COMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on counsel for all parties of record via electronic mail (e-mail) on this 30th day of September, 2025.

/s/ Paula N. Johnson