

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2025 Integrated Resource) File No. EO-2026-0088
Plan Annual Update Filing Update.)

**COMMENTS ON AMEREN’S 2025 ANNUAL
INTEGRATED RESOURCE PLAN UPDATE**

Grain Belt Express LLC (“Grain Belt Express”) hereby files its comments to the 2025 Annual Integrated Resource Planning (“IRP”) Update filed by Union Electric Company d/b/a Ameren Missouri (“Ameren” or “Company”) on October 30, 2025.

Grain Belt Express respectfully requests that the Commission direct Ameren to rectify the errors identified in the attached comments and submit a new supplement to its 2025 IRP Annual Update. Alternatively, the Commission should direct Ameren to fully model Grain Belt Express in its 2026 IRP analysis. Ameren appears to believe that because it evaluated Grain Belt Express pursuant to the Unanimous Stipulation and Agreement in File No. EA-2024-0237 (“Stipulation”), its obligation to consider Grain Belt Express and associated generation is now complete.¹ Grain Belt Express disagrees. As noted by Grain Belt Express in its October 10, 2025 Reply to Ameren’s Response to Proposed Special Contemporary Issues in File No. EO-2026-0037, Ameren continues to conflate its obligations pursuant to the Stipulation with its ongoing responsibilities in accordance with the Commission’s IRP rules.² Ameren’s singular, isolated analysis of the Grain Belt Express project pursuant to the Stipulation is insufficient for compliance with the IRP rules. Rather, Ameren must incorporate consideration of Grain Belt Express and associated generation as a

¹ Ameren Missouri’s Response to Proposed Special Contemporary Issues, Case No. EO-2026-0037, Attachment A, pp. 3-4 (Oct. 1, 2025).

² Reply to Ameren Missouri’s Response to Proposed Special Contemporary Issues, Case No. EO-2026-0037, pp. 3-4 (Oct. 10, 2025).

potential supply side resource within its IRP studies going forward.³ Ameren’s consistent refusal to comply with the Commission’s IRP rules should not be tolerated by the Commission and the Commission should require Ameren to incorporate analysis of Grain Belt Express in its 2026 triennial IRP and going forward.

The Commission has several options for directing Ameren to continue to study Grain Belt Express and associated generation as potential supply side resources and to direct Ameren to correct the errors identified in the attached comments. First, although Annual Updates do not independently trigger hearings or orders by the Commission, the Commission can still direct Ameren to submit a new supplement to its 2025 IRP Annual Update under the Commission’s general supervisory authority.⁴ Alternatively, the Commission could amend its Order Establishing Special Contemporary Issues in File No. EO-2026-0037 to include Grain Belt Express and associated generation as a “special contemporary issue” that must be studied in Ameren’s 2026 Triennial IRP filing. Most directly, the Commission can issue an order in Ameren’s 2023 Triennial IRP case, finding that Ameren’s failure to study generic Kansas wind and solar resources is a deficiency that must be corrected by Ameren in its IRP filings going forward. Grain Belt Express has requested that the Commission issue such an order numerous times, and the Commission is required to issue such an order pursuant to Commission Rule 20 CSR 4240-22.080(16).⁵ To date, no such order has been issued in File No. EA-2024-0020. If the Commission does not issue such

³ See Grain Belt Express LLC Motion for Commission Order on Deficiencies and Concerns, Case No. EO-2024-0020 (May 27, 2025) (Grain Belt Express’ Motion remains pending).

⁴ Section 393.140.9 RSMo. (authorizing the Commission to compel the production of information and reports from any electrical corporation).

⁵ See Grain Belt Express LLC Motion for Commission Order on Deficiencies and Concerns, Case No. EO-2024-0020 (May 27, 2025).

a directive to Ameren, the state of Missouri could be forfeiting hundreds of millions in savings for its electric consumers.

Respectfully submitted,

POLSINELLI PC

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**ATTORNEYS FOR GRAIN BELT EXPRESS
LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties listed on the official service list by email this 1st day of December, 2025.

By: /s/ Anne E. Callenbach
Anne E. Callenbach