

I. Ameren should explore opportunities to accelerate solar and wind projects from its current preferred plan to take advantage of expiring tax credits.

The 2025 federal reconciliation tax law dramatically reduces the availability of wind and solar tax credits. Ameren’s current preferred plan includes significant solar and wind additions, in recognition of the fact that these resources provide low-cost energy. Ameren should explore options for taking advantage of the expiring solar and wind tax credits, as doing so would likely reduce the cost of these projects by 30% or more for Ameren’s customers. To take advantage of these credits that significantly lower the cost of building renewable energy projects, Ameren should consider purchasing projects that have already gone through the MISO interconnection queue and utility “surplus interconnection” at retired or underutilized generation sites, among any other options that may be available. In sum, the expiring credits create a limited-time opportunity for Ameren to significantly lower costs and boost renewable energy deployment, making prompt action a smart financial move for Missouri customers.

II. The Company should evaluate purchasing from the Grain Belt Express transmission line in its upcoming triennial IRP.

As part of its 2025 IRP Update, Ameren conducted an evaluation of whether it makes economic sense for its customers to purchase from the Grain Belt transmission line. Ameren’s analysis found that such purchases are not cost-effective under Ameren’s current assumptions. The Grain Belt line will bring 2,500 MW of high-capacity value wind and potentially solar energy to Missouri’s MISO zone. At a minimum, Ameren Missouri should model purchasing a substantial portion of wind energy as a power purchase agreement from the Grain Belt line in its triennial IRP, when the Company will likely rely on more sophisticated modeling than it used here. Such a purchase would likely be cost effective and would give Ameren a resource that has a different production profile than local Missouri wind—thereby complementing its existing

resources—and would better serve the policy goals of the IRP to provide adequate service and reasonable rates for customers.

III. Ameren should work with stakeholders to unlock Solar for All funding for Missouri.

In 2024, the U.S. Environmental Protection Agency awarded \$156 million to the Missouri Environmental Improvement and Energy Resources Authority (“EIERA”) to implement distributed solar programs around the state.¹ EIERA’s Solar for All plan called for 218 MW of distributed solar, benefiting nearly 19,000 low-income households in the state.² By bringing a significant amount of additional energy to the grid, this program would improve reliability in the state, while benefiting low-income households. This funding is currently frozen by the federal administration. Ameren has an important role to play in working with EIERA, Missouri Public Service Commissioners, and other stakeholders to unlock this funding that would indisputably benefit electric reliability and the economy of Missouri.

IV. Conclusion

Sierra Club appreciates the opportunity to engage in Ameren’s IRP process and respectfully requests that the Company consider the points made herein.

¹ EPA, Press Release, “Biden-Harris Administration Announces Missouri Environmental Improvement and Energy Resources Authority to Receive \$156M to Deliver Residential Solar, Lowering Energy Costs and Advancing Environmental Justice Across Missouri,” *available at*: <https://www.epa.gov/newsreleases/biden-harris-administration-announces-missouri-environmental-improvement-and-energy>.

² EIERA, Solar for All Application, p. 4, *available at*: <https://eiera.mo.gov/wp-content/uploads/sites/11/2023/10/Missouri-Solar-for-All-Grant-Program-Narrative-2.pdf>.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Sierra Club submission was filed on EFIS and served upon all the attorneys of record via email.

Dated: December 12, 2025

Respectfully Submitted,

/s/ Sarah Rubenstein

Sarah Rubenstein