

# Schedule EV-3

(Ameren Data Request Responses)

Ameren Missouri  
Case Name: EA-2025-0238  
Docket No(s): Big Hollow CCN

Response to Discovery Request: Grain Belt-GB 1.3  
Date of Response: 10/8/2025  
Witness: N/A

Question: Please explain Ameren's contingency plan if the Projects are not operational by the September 2028 deadline, as is required under MISO's generator replacement process.

- a. Will Ameren still pursue the Projects as planned? If yes, will Ameren submit the Projects into the MISO interconnection queue (Definitive Planning Process or "DPP")? How would submittal into the DPP impact the Projects' projected COD and total cost?
- b. If the Projects' costs increase as a result of missing the September 2028 deadline, will Ameren hold its Missouri ratepayers harmless for any related increase in costs?

Response:

**Prepared By: Andrew Meyer**  
**Title: Sr. Director Energy Management & Trading**  
**Date: 09.30.2025**

The Company is actively executing its plan to reach Commercial Operations by September 1, 2028. As such, no specific contingency plan has been documented. If the September 1, 2028 COD is in jeopardy, and the driver for such delay is supply chain constraints or related project impediments, then the Company would consider petitioning FERC for a waiver from the MISO Tariff language requiring the September 2028 in-service date.

- a. and b. Without waiving the Company's objection to "b.", the Company states that no specific contingency plan or related cost assignment has been documented.

Ameren Missouri  
Case Name: EA-2025-0238  
Docket No(s): Big Hollow CCN

Response to Discovery Request: Grain Belt 2-GB 2.3  
Date of Response: 10/21/2025  
Witness: N/A

Question: Please clarify whether Witness Michael's testimony at pp. 35, lines 5 to 17 is intended to state that, in his view, capacity from Castle Bluff is not allowed to count as replacement capacity pursuant to Section 393.401, RSMo. If his position is that capacity from Castle Bluff cannot be counted toward compliance with Section 393.401, RSMo, please explain including specific references to any statutory text on which he bases his position.

Response:

**Prepared By: Matt Michels**  
**Title: Director, Corporate Analysis**  
**Date: October 13, 2025**

For purposes of this response, it is assumed that the testimony referenced is actually page 37, lines 5 to 17, of my direct testimony. By the terms of the statute, the Commission must certify that the generation in the CCN case at issue (which for Castle Bluff, would have been the Castle Bluff CCN proceeding) is reliable replacement generation meeting the requirements of the statute. 393.401.4(2). This was neither possible nor done in the Castle Bluff CCN case since the statute did not exist.

Ameren Missouri  
Case Name: EA-2025-0238  
Docket No(s): Big Hollow CCN

Response to Discovery Request: Grain Belt 3-GB 3.12  
Date of Response: 11/7/2025  
Witness: N/A

Question: Please clarify the Company's positions as stated in its response to Data Request GB 1.11(d) that Castle Bluff "cannot qualify as reliable electric generation for purposes of the statute" due to the date on which Ameren received a CCN for the Project and its subsequent response to Data Request GB 2.3 that states "[b]y the terms of the statute, the Commission must certify that the generation in the CCN case at issue (which for Castle Bluff, would have been in the Castle Bluff CCN proceeding) is reliable replacement generation meeting the requirements of the statute."

- a. Is it Ameren's position that the CCN proceeding is the proceeding in which the company would request certification from the Commission that a particular resource would qualify as reliable replacement generation?
- b. Is it Ameren's position that generation that received a CCN prior to the effective date of SB4 cannot count as reliable replacement generation pursuant to Section 393.401 RSMo?
- c. If the answer to sub-part (a) is yes, why did Ameren not request certification of Big Hollow as reliable replacement generation in this proceeding?

Response:

**Prepared By: Matt Michels**  
**Title: Director, Corporate Analysis**  
**Date: November 5, 2025**

- a. Yes.
- b. Yes.
- c. The Company intends to request that Big Hollow be designated reliable replacement generation as part of the current case.