

**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 Certificates of Convenience)
and Necessity Authorizing it to Construct a New) File No. EA-2025-0238
Generation Facility and Battery Energy Storage)
System)

Motion to Amend Protective Order

COMES NOW Grain Belt Express LLC (“Grain Belt Express”) and for its Motion to Amend Protective Order states as follows:

1. On August 20, 2025, the Public Service Commission of the State of Missouri issued a Protective Order (“Protective Order”).
2. The Protective Order provides for a two-tiered confidentiality designation—a “Confidential” category for information encompassing the usual scope of protected information in Commission proceedings (including information covered under Commission Rule 20 CSR 4240-2.135(2)); and a “Highly Confidential” category for classes of information relating to pricing, agreements, and competitively sensitive information relating to Ameren Missouri’s projects and third party contracting relating thereto. *See* Protective Order at 1-2. Because of how the Motion for Protective Order is drafted (and the original scope of the proceeding), the Highly Confidential is slanted to information relating to just Ameren Missouri’s information rather than similarly sensitive information offered by any other party.
3. Since the Protective Order was granted, Grain Belt Express has received a number of data requests from Ameren Missouri and Commission Staff relating to similar tranches of information, but about the Grain Belt Express Transmission Line and related generation projects.

4. Grain Belt Express reserves the right to challenge whether all of these requests are relevant but moves to amend the Protective Order in advance of making certain disclosures voluntarily.

5. For the same reasons Ameren Missouri seeks to protect information relating to pricing, agreements, and competitively sensitive information relating to Ameren Missouri's projects and third party contracting relating thereto, so too does Grain Belt Express with its information.¹

6. Grain Belt Express proposes the following adjustments to paragraph (a) of the Protective Order:

a. Materials and information divulged by any party shall be considered to be "Highly Confidential" if so designated at the time of disclosure.

a. The term "Highly Confidential" may include: (A) responses to these various bid specifications and Requests for Proposals ("RFPs") and company analyses of these responses, including consideration by a company's board of directors; (B) any agreements (and documents reflecting the terms of such agreements), entered into by a company with an EPC contractor and with entities that will design, construct, or maintain components of the generation or transmission projects; (C) any testimony regarding the specific terms and conditions and various cost and pricing information related to the EPC contracts and to various cost and pricing information; (D) the terms and conditions of agreements (and documents reflecting such terms and conditions) with entities that will construct components of generation or transmission projects (the "Supplier Terms"); confidential information relating to the industrial customer operations; (E) including customer specific data, customer pricing, supply costs, business relationships, market data, other proprietary data and protected trade secrets; and (F) information relating to confidential contracts entered into relating to industrial customers.

¹ As Ameren provides in its Amended Motion for Protective Order, the Commission has long recognized a need to protect commercially-sensitive information related to the construction of generation facilities. *See Amended Motion for Protective Order at 1 and fn. 1*

7. No other changes to the Protective Order are needed to effectuate Grain Belt Express' request on this issue.

WHEREFORE, Grain Belt Express respectfully requests the Commission grant this Motion for a Protective Order and take such other actions as the Commission deems necessary to protect this information.

Respectfully submitted,

/s/ Andrew O. Schulte

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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 5th day of January, 2026.

/s/ Andrew O. Schulte
Andrew O. Schulte