

## EXHIBIT A

### Data Request No. 1

**Description:** Does GBX currently have any interconnection requests pending with MISO? If so, please state, separately for each such request, under which MISO procedure the request was submitted (e.g., under MISO's Merchant HVDC Transmission Connection Procedure, or MISO's Generation Interconnection Procedure, or under a different MISO Interconnection Procedure). Please provide a copy of each such interconnection request. Please also provide a detailed explanation of the status of each such interconnection request.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Further, Grain Belt Express objects to the extent that this information is publicly available and/or was previously provided to Ameren.

**RESPONSE:** The requested discovery is both relevant on its face and reasonably calculated to lead to the discovery of relevant information. GBX has asserted in this proceeding that the CCN in this case should not be granted because Ameren Missouri has not considered the generation the GBX line could deliver to the Ameren system; in fact, serving those needs better than the proposed projects. Having inserted this issue in this proceeding, this request seeks information relevant to GBX's claims. To deliver energy to MISO (including to Ameren Missouri for use in serving its customers), GBX must interconnect with the transmission system under MISO's functional control, which requires approval of one or more interconnection requests.

Interconnection requests trigger studies by MISO to determine the impact of a given request on the interconnected transmission system. Different interconnection requests can request different injection rights (timing, quantity, different line functionality) or different treatment by MISO. It is the Company's understanding that GBX may have submitted different interconnection requests at different times and that those requests may vary in terms of how GBX plans to configure or operate the line or may vary as to the quantities of energy GBX seeks rights to inject. The details of such requests, and their status, may directly affect the viability of the GBX line, its functionality, the timing of its possible commercial operation, and its rights to actually deliver energy to MISO (Ameren Missouri), as it claims.

Moreover, the request is not unduly burdensome. What requests GBX may have made are limited in number.

Finally, the assertion that the requested information is publicly available is simply not true. MISO does not publicly post interconnection requests but, at most, provides a high-level summary listing. And the requests themselves, including the details (scope, timing of when any studies would be done, etc.), are not available publicly. And Ameren Missouri does not possess the requested information itself.

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### Data Request No. 2

**Description:** Does GBX currently have any interconnection requests pending with SPP? If so, please state, separately for each such request, under which SPP procedure the request was submitted. Please provide a copy of each such interconnection request. Please also provide a detailed explanation of the status of each such interconnection request.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Further, Grain Belt Express objects to the extent that this information is publicly available and/or was previously provided to Ameren.

**RESPONSE:** The requested discovery is both relevant on its face and reasonably calculated to lead to the discovery of relevant information. GBX has asserted in this proceeding that the CCN in this case should not be granted because Ameren Missouri has not considered the generation the GBX line could deliver to the Ameren system; in fact, serving those needs better than the proposed projects. Having inserted this issue in this proceeding, this request seeks information relevant to GBX's claims. GBX claims certain reliability, resiliency, and other benefits from the GBX line (which benefits GBX in turn relies upon to support its claims that the line and Kansas generation could meet or better meet Ameren Missouri's needs) that depend in part on how the GBX line will operate in and interact with SPP, e.g., arbitrage benefits GBX claims, as discussed in Vandenberg Schedule EV-2. Moreover, SPP interconnections could also impact the timing of full operation of GBX, the availability of Kansas generation to be delivered via the line (to Missouri or SPP), and some of the benefits GBX claims, etc.

Upon information and belief, the requests that GBX may have made to SPP are not available publicly, and Ameren Missouri has not been provided these requests.

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### Data Request No. 4

**Description:** Please identify wind energy projects and solar energy projects that, to GBX's knowledge, are under development and which, if developed, are expected to interconnect to Phase I of the GBX line. For each such project, please provide a detailed explanation of the status of each wind and solar project, including whether all land or land rights needed for the project have been acquired (and, if not, what percentage of such rights have been acquired), whether the project has obtained all permits required for its construction and operation, whether the project has started construction, when the project is expected to commence commercial operation, the project's nameplate capacity, and the project's developer.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information that is in the possession of third parties and that is not in the possession, custody, or control of Grain Belt Express.

**RESPONSE:** The requested discovery is both relevant on its face and reasonably calculated to lead to the discovery of relevant information. GBX has asserted in this proceeding that the CCN in this case should not be granted because Ameren Missouri has not considered the generation the GBX line could deliver to the Ameren system; in fact, serving those needs better than the proposed projects. Having inserted this issue in this proceeding, this request seeks information relevant to GBX's claims. It is obvious that regardless of the possible existence of the GBX line, there must be commercially operable generation connected to it and capable of delivering energy to MISO by it at the time, in the quantities, and at a cost that would meet Ameren Missouri's and its customers' needs. The status of the development (or lack thereof) of such generation is thus obviously relevant to the issues in this case. GBX's additional objection, that it does not have possession, custody, or control of such information, fails as a matter of law, as this Commission has recognized in rejecting another utility's similar claim:

Summit's objections state in conclusory fashion that Summit does not have possession, custody, or control of the information because the information is in the hands of another person. But each such other person is either Summit's owner or another closely related entity. That fact refutes Summit's objections.

The Missouri Supreme Court has instructed that the essence of the "possession, custody or control" principle is practical ability to obtain.

Plaintiff misses the thrust of Rule 58.01(a). The rule is not limited to documents only in the possession of a party. Instead, Rule 58.01(a) provides that "[a]ny party may serve on another party a request (1) to produce ... any designated documents

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... which are in the possession, custody *or control* of the party upon whom the request is served ...." (emphasis added). Our Rule 58.01(a) is identical to Federal Rule of Civil Procedure 34(a). The "[b]asic test of the rule is 'control' rather than custody or possession." ("The true test is control and not possession."). "Control" does not require that the party have legal ownership or actual physical possession of the documents at issue; rather, documents are considered to be under a party's control when that party has the right, authority, or practical ability, to obtain the documents from a non-party to the action." (A court may require a party to produce documents held by a non-party if the party has the "practical ability to obtain the documents ... irrespective of his legal entitlement to the documents."); ("The word 'control' is to be broadly construed...."). In [a criminal action], Missouri applied the "control" test in relation to discovery in a murder case holding that it was error for the trial court to allow into evidence a coat with bullet holes that had not been disclosed to the defense. <sup>14</sup>

[The] Missouri Supreme Court affirmed the exclusion from evidence of documents in the hands of a non-party that the plaintiff had the "practical ability to obtain."<sup>15</sup> In that case, the served party and possessing non-party were unrelated individuals: a dairy farmer and a veterinarian.

Much more persuasive are the facts of this case. Here the served party is a regulated utility and the possessing non-parties are owners of, or owned by, one another. The close relation of the corporate entities shows—and Summit has not denied—that Summit has the practical ability to obtain the information sought. And Staff seeks no exclusion of evidence, only compliance with discovery, as described under the case law cited.

The enforceable reach of discovery is the practical reach of the party served, so the Commission will overrule the objection.

*In the Matter of Summit Natural Gas of Missouri Inc.'s Filing of Revised Tariff to Increase its Annual Revenues for Natural Gas Service, File No. GR-2014-0086, YG-2014-0285 (June 19, 2014 Order Granting Motion to Compel).*

Exactly the same circumstance exists here. GBX is owned by Invenergy Transmission, which is an affiliate of Invenergy Renewables. Invenergy Renewables (or another Invenergy entity that the corporate family may choose to create) can be expected to be the developer of Kansas wind and solar resources that would connect to the GBX line. See, e.g., <https://thresherwind.invenergy.com/> (Invenergy's website for the Thresher wind project, which purportedly would connect to the GBX line). GBX has the practical ability to obtain the requested information.

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### Data Request No. 8

**Description:** Referring to Schedule EV-2, paragraph 13 (pages 6-7), if GBX had assumed the indicated portfolio of Kansas resources (i.e., 600 MW of wind and 200 MW of solar) would instead displace natural gas-fired resources, how much natural gas-fired resources (installed capacity in MW) would GBX expect would be displaced. Please provide any calculations as well as any sources and references used as the basis for any assumed accreditation values.

**OBJECTION:** Grain Belt Express objects to this request because the phrase “natural gas-fire resources” is vague and ambiguous. There are different types of natural gas, each of which would trigger a different calculation. Grain Belt Express also objects to the extent this request calls for the creation of calculations not in existence and not within Grain Belt Express’ custody and control.

**RESPONSE:** Respectfully, this objection appears to be lacking in good faith. GBX itself (e.g., in its comments filed in Ameren Missouri’s 2023 IRP docket) refers to “simple-cycle gas-fired combustion turbine generators” (emphasis added). Moreover, the GBX’s claim in this case is that the Big Hollow “simple-cycle gas-fired combustion turbine” project should not be approved, a claim premised in part on claims that the GBX line and (presumably) Invenergy renewables can meet the need instead. GBX fully understands what “natural gas-fire resources” refers to.

Respecting seeking “calculations not in existence,” if GBX can’t answer the question because the calculations don’t exist, it can so state.

Its lack of “custody and control” objection is also not well taken – see the discussion in connection with DR No. 4, above.

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### Data Request No. 12

**Description:** What is the current project schedule for completion of Phase I of the GBX line? If there are different schedules for different segments, please provide the schedules for each segment and for the entirety of Phase I. Please provide documents in GBX's possession, custody, or control that reflect or discuss the foregoing project schedules including, but not limited to, internal GBX documents or documents from GBX's contractors including Quanta Services and Kiewit Energy Group.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Grain Belt Express also objects on the ground that the request is overbroad and unduly burdensome as it seeks what would be hundreds or thousands of documents that reflect or discuss construction schedules and may reveal sensitive and proprietary commercial information. The burden of producing such information, and the risk of revealing sensitive and proprietary commercial information, far outweigh the negligible probative value of the information sought. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information that is in the possession of third parties and that is not in the possession, custody, or control of Grain Belt Express.

**RESPONSE:** With respect to GBX's "scope" objection and its claim of "negligible probative value," see the discussion respecting DR No. 1 above. When the GBX line would actually be completed is a critical fact to evaluating GBX's claims respecting its efficacy at purportedly meeting Ameren Missouri's and its customers' needs when those needs exist. An examination of the current project schedule would also provide important context given the history of this project's development. In point of fact, the Commission has previously been advised in 2011 that the project has "made significant progress," then told later that it would begin construction in 2016 and be complete in 2018, to later be advised that those dates would be 2018 and 2021, respectively, and then that construction would start at the end of 2027 for completion perhaps in 2030.

See the discussion in connection with DR No. 4 above respecting why GBX's "possession, custody, and control" objection fails.

With respect to the "overbroad and unduly burdensome objection," the request asks for the current schedules, by segment, if available. There is no reason to believe that GBX does not have or have access to a current project schedule(s) for the project, or that it can't readily retrieve the same from its records and produce it. GBX has not offered an explanation as to why this request is unduly burdensome.

Regarding the claim of confidentiality, GBX can produce the response with confidentiality protection.

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### Data Request No. 13

**Description:** Please provide documents in GBX's possession, custody, or control created or modified in the past 36 months that reflect or discuss prior (i.e., schedules other than the current) project schedules for completion of Phase I of the GBX line, including, but not limited to, internal GBX documents or documents from GBX's contractors including Quanta Services and Kiewit Energy Group.? If there are different schedules for different segments of Phase I, please provide the prior schedules for each segment and for the entirety of Phase I.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Grain Belt Express also objects on the ground that the request is overbroad and unduly burdensome as it seeks what would be hundreds or thousands of documents that reflect or discuss construction schedules and may reveal sensitive and propriety commercial information. The burden of producing such information, and the risk of revealing sensitive and propriety commercial information, far outweigh the negligible probative value of the information sought. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information that is in the possession of third parties and that is not in the possession, custody, or control of Grain Belt Express.

**RESPONSE:** For the reasons just discussed in DR No. 12, it is reasonable to evaluate over a relatively short, defined period (three years) how the GBX project schedule has evolved as part of an effort to gauge the reasonableness of the current schedule and the likelihood it would actually be adhered to.

See the discussion in connection with DR No. 4 above relating to GBX's "possession, custody, or control" objection.

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### Data Request No. 14

**Description:** Please provide GBX's or its contractor's best estimate of how many days it will take, on average, to fully complete a mile of construction of Phase I of the GBX line.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information that is in the possession of third parties and that is not in the possession, custody, or control of Grain Belt Express.

**RESPONSE:** The requested documents are within the scope of this proceeding because they are relevant and reasonably calculated to lead to the discovery of admissible evidence, as explained in Ameren Missouri's responses to Data Request Nos. 12 and 13. Simply put, this request poses a basic question relating to the timing of completion of the GBX line. There is no legitimate reason not to answer the question.

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### Data Request No. 15

**Description:** Please provide documents created or modified in the past 36 months reflecting or discussing any risk assessments or plans to mitigate risks regarding the construction of Phase I of the GBX line.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Grain Belt Express also objects on the ground that the request is overbroad and unduly burdensome as it seeks what would be hundreds or thousands of documents that reflect or discuss construction schedules and may reveal sensitive and proprietary commercial information. The burden of producing such information, and the risk of revealing sensitive and proprietary commercial information, far outweigh the negligible probative value of the information sought. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information that is in the possession of third parties and that is not in the possession, custody, or control of Grain Belt Express.

**RESPONSE:** With regard to the relevance of this request, please see the earlier response to GBX's objections to Data Request Nos. 12, 13, and 14. The GBX line project has experienced numerous delays over more than a decade and such delays are inherently a risk of any major project, including a project spanning two states and hundreds of miles. The risk assessments/plans sought by this DR are reasonably calculated to reveal whether and to what extent GBX has considered and plan need for such risks, which could in turn impact the timing of project completion.

See the response to GBX's objection to Data Request No. 4 relating to documents within GBX's "possession, custody, or control."

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### Data Request No. 16

**Description:** Please provide the current financing plan for the construction of Phase I of the GBX line, including the status of and a detailed explanation regarding the terms of any government-backed financing options GBX intends to use or is considering using.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. The request is also overly broad and unduly burdensome. The burden of producing such information, and the risk of revealing sensitive and propriety commercial information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express further objects to this request to the extent it calls for information subject to confidentiality terms limiting disclosure unless compelled under a protective order.

**RESPONSE:** The requested documents are relevant. It is publicly known that GBX had planned to rely heavily on US DOE loans to finance the project, and that the DOE has cancelled that loan commitment. GBX's ability to finance the project and to do so in a timely manner is directly relevant to the question of project viability, timing and depending on the operational features of the line, could be relevant to the line's functionality, and when.

Nor can GBX avoid discovery simply because responsive information may be confidential. The Commission's rules governing discovery and the broad protective orders in place in this case are applicable to the information sought.

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### Data Request No. 17

**Description:** In May of this year, the U.S. Department of Energy (“DOE”) cancelled a loan guaranty for GBX. To the extent not fully outlined in GBX’s response to Data Request (“DR”) No. 16, please provide a detailed explanation of how GBX plans to finance each of Phases I and II of the GBX line, including a specific timeline outlining when necessary financing to (a) construct and (b) own and commercially operate each such Phase will be in place.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. The request is also overly broad and unduly burdensome. The burden of producing such information, and the risk of revealing sensitive and propriety commercial information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren’s request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a “potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire” in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** Ameren Missouri incorporates its response to GBX’s objection to Data Request No. 16.

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### Data Request No. 18

**Description:** Does GBX have sufficient commitments for contracts for undivided interests or other long-term contracts for contract capacity for Phase I of the GBX line to use as security for the debt capital GBX will need to construct Phase I of the GBX line? Please also answer the foregoing question for Phase II of the GBX line.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. The request is also overly broad and unduly burdensome. The burden of producing such information, and the risk of revealing sensitive and proprietary commercial information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express further objects to this request to the extent it calls for information subject to confidentiality terms limiting disclosure unless compelled under a protective order.

**RESPONSE:** The information sought is directly relevant as it goes directly to questions relating to the viability and timing of completion of the GBX line, as discussed previously.

Moreover, confidential information is not immune from discovery.

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### Data Request No. 19

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Para. 98. Is GBX still evaluating the governmental sources listed in that paragraph? Does GBX have any commitments from any of the agencies or programs listed in that paragraph for governmental financing of Phase I of the GBX line? If so, please describe those commitments in detail, including when the commitment was made and the amount of each such commitment. Please also answer the foregoing questions for Phase II of the GBX line.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. The request is also overly broad and unduly burdensome. The burden of producing such information, and the risk of revealing sensitive and propriety commercial information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is directly relevant as it goes directly to questions relating to the viability and timing of completion of the GBX line, as discussed previously.

Regarding GBX's complaint that production of such information is unduly burdensome, such information, if it exists, should be readily available to GBX; indeed, it offers no reason to support its objection; other than the fact that the information may be confidential. Confidential information is not protected from discovery.

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### Data Request No. 20

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Para. 98. Has GBX raised any additional equity capital for the GBX line? If so, when was such capital raised and in what amount? Please identify whether such capital was raised for Phase I or Phase II, or both, and designate any discrete amounts for each of Phase I and Phase II.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. The request is also overly broad and unduly burdensome. The burden of producing such information, and the risk of revealing sensitive and proprietary commercial information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant to the issues in this case—issues that GBX inserted into the case. Information regarding the financing of the GBX line directly relate to the viability and timeliness of completion of the GBX line. The record in the referenced docket indicates that GBX will rely in part on equity capital to finance the line. Questions respecting the same are relevant and reasonably calculated to lead to the discovery of admissible evidence just as they are regarding debt capital.

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### Data Request No. 21

**Description:** Currently, what equity and debt capital combined does GBX have available to construct Phase I of the GBX line? Please state the amount of equity and debt separately. Please answer the foregoing questions for Phase II.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding, and the risk of revealing sensitive and propriety information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant to the issues in this case—issues that GBX inserted into the case. Information regarding the financing of the GBX line directly relate to the viability and timeliness of completion of the GBX line. The record in the referenced docket indicates that GBX will rely in part on equity capital to finance the line. Questions respecting the same are relevant and reasonably calculated to lead to the discovery of admissible evidence just as they are regarding debt capital.

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### Data Request No. 22

**Description:** In its Report and Order in File No. EA-2023-0017, Paragraph 106, the Commission (based on Mr. Sane's testimony) indicated that the entire GBX project (Phases I and II) was estimated to cost \$4.95 billion. In Paragraph 107, the Commission cited a figure of \$3.52 billion for Phase I. What is the current estimated cost of the entire GBX line? What is the current estimated cost of Phase I of the GBX project? Please state whether these current estimates include required upgrade costs for RTO interconnections. If they do not include such upgrade costs, what is the current estimate for such upgrade costs for each of Phase I and Phase II?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant and reasonably calculated to lead to the discovery of admissible evidence. Whether the GBX line and Kansas renewable resources they might connect to it could possibly meet Ameren Missouri's and its customers' needs as well as or better than the resources proposed in this docket absolutely would depend in part on the cost of the GBX project. And since the record in the referenced docket suggests that some of the claimed benefits for Phase I of the GBX line could depend on completion of Phase II of the line, those costs too are relevant and discoverable.

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### Data Request No. 23

**Description:** In the Report and Order in File No. EA-2023-0017, the Commission made note of national security benefits from the GBX line. Did DOE provide any feedback, whether written or verbal, relating to any national security benefits of the GBX line? If so, please provide an accurate summary of any verbal feedback and copies of any written feedback? If not, did GBX discuss or otherwise advise DOE of such national security benefits and if the answer is “yes,” please accurately summarize any verbal information in this regard provide by GBX to DOE and provide copies of any written information in this regard.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren’s request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a “potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire” in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant and likely to lead to the discovery of admissible evidence. GBX has claimed these benefits; whether the U.S. government has itself recognized these such benefits is relevant to the viability of the construction of the line.

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### Data Request No. 26

**Description:** Does GBX possess the necessary authority from MISO to operate Phase I bidirectionally?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding, outside the scope of Mr. Vandenberg's testimony, and is not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant and reasonably calculated to the discovery of admissible evidence. In fact, GBX implicitly acknowledges the relevance of the bi-directional operation of its line in its response to Data Request No. 25. To the extent that bi-directional operation is a benefit of the GBX line, justifying its construction as well as its consideration as a potential substitute for the projects at issue in this docket, whether GBX can actually operate the line bi-directionally is an issue in this case.

## EXHIBIT A

### Data Request No. 27

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Paragraph 127, where the Commission references the "potential" for bidirectional capability. Will Phase I of the GBX line be fully capable of bidirectional operation when Phase I is placed into commercial operation? If not, please explain in detail why not.

**OBJECTION:** Grain Belt objects to this request because it is outside of the scope of this proceeding, outside the scope of Mr. Vandenberg's testimony, and is not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** The information sought is relevant and reasonably calculated to the discovery of admissible evidence. In fact, GBX implicitly acknowledges the relevance of the bi-directional operation of its line in its response to Data Request No. 25. To the extent that bi-directional operation is a benefit of the GBX line, justifying its construction as well as its consideration as a potential substitute for the projects at issue in this docket, whether GBX can actually operate the line bi-directionally is an issue in this case.

## EXHIBIT A

### Data Request No. 29

**Description:** Will all required registrations and necessary studies and agreements to fully utilize black-start services be in place when the GBX starts commercial operations? If not, when will they be?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding, outside the scope of Mr. Vandenberg's testimony, and is not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. GBX has placed any analysis of any claimed benefits at issue in this case. To the extent black-start capability is a benefit of the GBX line as a potential substitute for the projects at issue in this docket, whether the GBX line can actually provide black-start capability is highly relevant to that issue in this case.

## EXHIBIT A

### Data Request No. 30

**Description:** Does GBX have mitigation, response, and/or restoration plans in the event of weather-related impacts to the operation of Phase I of the GBX line? If so, please provide copies of all such plans.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding, outside the scope of Mr. Vandenberg's testimony, and is not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. If the GBX line and Kansas renewables connected to it were to substitute for projects like those at issue in this docket, Ameren Missouri would be entirely dependent on a single, 500-mile line from Western Kansas for delivery of energy from such renewables. The existence and details of the plans sought by this DR could bear on the question of whether such reliance is prudent and whether Ameren Missouri's and its customers' needs could be met.

## EXHIBIT A

### Data Request No. 31

**Description:** If the GBX line is placed into operation, what RTO will have functional control of it?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This rather simple information request seeks information relevant to this proceeding. The suitability of the line as a substitute for the resources at issue in this docket could depend on how it is controlled and operated, including whether inter-regional coordination between different RTOs (and an RTO that is different than the one in which Ameren Missouri participates) would be necessary. The DR requests simple, straightforward information about such operations.

## EXHIBIT A

### Data Request No. 32

**Description:** How many parcels will Phase I of the GBX line cross in Missouri, apart from the parcels to the crossed by the Tiger Connector? Over how many of those parcels in Missouri does GBX currently require additional easements or other land rights necessary to construct, own, and operate the GBX line?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The line cannot be built and placed into commercial operation so that it can deliver energy to MISO if necessary land rights are not obtained and even if such land rights are obtained, when they are obtained can impact the timing of operation of the line and delivery of energy. Obviously, the Missouri segment of the line cannot deliver energy from Kansas resources until the Kansas segment is operational.

## EXHIBIT A

### Data Request No. 33

**Description:** How many parcels will the Tiger Connector segment of Phase I of the GBX line cross in Missouri? Over how many of those parcels in Missouri does GBX currently require additional easements or other land rights necessary to construct, own, and operate Phase I of the GBX line?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. Simply put, the line cannot be built and placed into commercial operation so that it can deliver energy to MISO if the necessary land rights are not obtained, and even if such land rights are obtained, when they are obtained can impact the timing of operation of the line and delivery of energy.

## EXHIBIT A

### Data Request No. 34

**Description:** How many parcels will the GBX line cross in Kansas? Over how many parcels in Kansas does GBX currently require additional easements or other land rights necessary to construct, own, and operate the GBX line?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. Simply put, the line cannot be built and placed into commercial operation so that it can deliver energy to MISO if the necessary land rights are not obtained, and even if such land rights are obtained, when they are obtained can impact the timing of operation of the line and delivery of energy.

## EXHIBIT A

### Data Request No. 35

**Description:** What firm transmission capacity commitments are in place to take power from GBX's Missouri convertor station to be connected to the AECI system?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The financial viability of the project (and thus its ability to deliver benefits/energy to MISO, and when) depends not just on planned deliveries to MISO but at least in part to AECI as well. The extent and status of those commits may impact whether the line can be built, and when.

## EXHIBIT A

### Data Request No. 36

**Description:** What firm transmission capacity commitments are in place to take power from GBX's Missouri convertor station to be connected to the system under MISO's functional control (i.e., Ameren Missouri's transmission system)?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The financial viability of the project (and thus its ability to deliver benefits/energy to MISO, and when) depends on having commitments for actual utilization of the line. The extent and status of those commits may impact whether the line can be built, and when.

## EXHIBIT A

### Data Request No. 37

**Description:** Stated separately, what are the total MW of wind and solar energy to be delivered to the Missouri converter station to be connected to the AECI system that are under contract pursuant to a power purchase agreement or similar contract?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The financial viability of the project (and thus its ability to deliver benefits/energy to MISO, and when) depends not just on planned deliveries to MISO but at least in part to AECI as well. The extent and status of those commits may impact whether the line can be built, and when.

## EXHIBIT A

### Data Request No. 38

**Description:** The Commission’s Report and Order in File No. EA-2023-0017 cited PPAs between the Missouri Electric Commission (“MEC”) and Iron Star (now Santa Fe Wind Project) and PPAs between four Missouri cities for a total commitment of 136 megawatts. Currently, and stated separately for each of wind and solar, what are the total megawatts of wind and solar energy to be delivered to the Missouri convertor station to be connected to the AECI system that are under contract pursuant to a power purchase agreement or similar contract?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren’s request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a “potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire” in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The financial viability of the project (and thus its ability to deliver benefits/energy to MISO, and when) depends not just on planned deliveries to MISO but at least in part to AECI as well. GBX relied on PPAs like those referenced in this question as justification for the viability of the line. The extent and status of such PPAs or similar PPAs may impact whether the line can be built, and when.

## EXHIBIT A

### Data Request No. 39

**Description:** Stated separately for each of wind and solar, what are the total MW of wind and solar energy to be delivered to the Missouri convertor station to be connected to Ameren Missouri's system that are under contract pursuant to a power purchase agreement or similar contract?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** For the reasons previously stated, the information sought is relevant and reasonably calculated to the discovery of admissible evidence. The financial viability of the project (and thus its ability to deliver benefits/energy to MISO, and when) depends on having commitments for actual utilization of the line. The extent and status of those commits may impact whether the line can be built, and when.

## EXHIBIT A

### Data Request No. 40

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Paragraph 150.c. Has GBX submitted the required documentation to Commission Staff regarding applicable federal and Missouri environmental permits?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue of the GBX line's timeline. If the answer to the question is "no," this would tend to show that such permits have not been obtained which, in turn, would impact both the viability of and timing of completion of the line.

## EXHIBIT A

### Data Request No. 41

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Paragraph 150.e. Has the GBX line been designated as a system restoration resource by any RTO? If so, which RTO, when was the designation provided, and provide documentation evidencing such designation.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. To the extent operation as a system restoration resource is a benefit of the GBX line as a potential substitute for the projects at issue in this docket, whether the GBX line will actually be designated as such is an issue in this case.

## EXHIBIT A

### Data Request No. 42

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Paragraph 151.c. Have there been any material changes in the design and engineering of Phase I of the GBX line?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. Changes in design or engineering could impact the operation of the line, its benefits, its cost, and its timing, all of which have been placed at issue by GBX in this docket due to its claims that the line and Kansas renewables could substitute for the projects at issue in this case.

## EXHIBIT A

### Data Request No. 43

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Paragraph 151.d. Have any RTO studies raised any new issues not before the Commission in File No. EA-2023-0017? If so, please describe those issues in detail?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. If new issues have been raised, they could impact the operation of the line, its benefits, its cost, and its timing, all of which have been placed at issue by GBX in this docket due to its claims that the line could and Kansas renewables could substitute for the projects at issue in this case.

## EXHIBIT A

### Data Request No. 45

**Description:** Does GBX have sufficient commitments for contracts for undivided interests or other long-term contracts for contract capacity for Phase II of the GBX line to use as security for the debt capital GBX will need to construct Phase II of the GBX line?

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. As previously pointed out, questions relating to the viability of the line—specifically, whether GBX has contracted for capacity as a means of financing its line—are relevant to whether the GBX line is viable and can provide the capacity it says will replace the projects at issue in this CCN proceeding.

## EXHIBIT A

### Data Request No. 46

**Description:** Reference the Commission's Report and Order in File No. EA-2023-0017, Para. 98. Is GBX still evaluating the governmental sources listed in that paragraph? Does GBX have any commitments from any of the agencies or programs listed in that paragraph for governmental financing of Phase II of the GBX line? If so, please describe those commitments in detail, including when the commitment was made and the amount of each such commitment.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding outweighs the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. As previously pointed out, questions relating to the viability of the line—specifically, whether GBX has the ability to finance its line—is relevant to whether the GBX line is viable and can provide the capacity it says will replace the projects at issue in this CCN proceeding.

## EXHIBIT A

### Data Request No. 47

**Description:** Currently, what equity and debt capital combined does GBX have available to construct Phase II of the GBX line? Please state the amount of equity and debt separately.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. As previously pointed out, questions relating to the viability of the line—specifically, whether GBX has the ability to finance Phase II of its line—is relevant to whether the GBX line is viable and can provide the capacity it says will replace the projects at issue in this CCN proceeding.

## EXHIBIT A

### Data Request No. 48

**Description:** According to the Kansas Corporation Commission's order granting a certificate to construct and operate the GBX line in Docket No. 11-GBEE-624-COC, the Commission required quarterly GBX to provide “[s]uch reports shall include the following information:

- (a) Percent completion of project
- (b) Amount spent to date
- (c) Amount previously expected to have been spent to date
- (d) Total budget of project (and explanation of increases/decreases)
- (e) SPP Agreements and Invoices
- (f) Agreements with other Kansas jurisdictional public utilities
- (g) FERC filings
- (h) Status of routing
- (i) Status of public outreach/public meetings
- (j) Status of right-of-way and real estate acquisition in Kansas

For each quarter of reporting to date, please provide the information requested in (a), (b), (c), (d), and (j). If such information was not provided the Commission as required (e.g., percentage of completion of project), please explain why the information was not provided in compliance with the Commission's order.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Further, Grain Belt Express objects to the extent that this information is publicly available in KCC Docket No. 14-GBEE-527-CPL.

**RESPONSE:** This request seeks information that is relevant to the issue that GBX injected into this case; namely, whether the GBX line can provide the benefits and services it says it can in place of the generation that the proposed projects can provide. The GBX line cannot deliver energy to MISO unless the Kansas segment is completed and commercially operable. On its face, the information the KCC requires goes to questions of the line's viability, its progress, and its timing.

## **EXHIBIT A**

With regard to “public availability,” GBX has heavily redacted the publicly available reports and from those public reports, it appears some information has not been provided (e.g., percent completion). Moreover, GBX did not file its earlier reports in a publicly-available format. Such information (or lack of it) goes to the viability and timing of the line.

## EXHIBIT A

### Data Request No. 49

**Description:** In its July 15, 2019, quarterly report to the Kansas Corporation Commission, GBX reported that it had received requests for more than 20,000 MW of transmission service from its line. Please identify the source of these requests and the amount in MW each source requested. For each such request, please state whether the request is for Phase I or Phase II, or both, and please specify whether the request represents a firm commitment for transmission service by the requesting party. If it does represent a firm commitment, please identify the requesting party, the date the commitment was made, the capacity committed to, and whether the requesting party has executed a contract reflecting the commitment.

**OBJECTION:** Grain Belt Express objects to this request because it is outside of the scope of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. At minimum, the burden of responding, and the risk of revealing sensitive and proprietary information, outweigh the negligible probative value of the request considering the purpose of this proceeding. This docket centers on Ameren's request for a CCN to construct and operate generation. Grain Belt Express and related generation is relevant only so far as Ameren failed to study it as a "potential supply-side resource option which the utility can reasonably expect to use, develop, implement or acquire" in its IRP. Details sought by this request are not required to establish this fact as it relates to this proceeding. Grain Belt Express also objects to this request to the extent it calls for information subject to confidentiality terms limiting disclosure unless compelled under a protective order.

**RESPONSE:** For the reasons already stated, the information sought is relevant to the issue that GBX injected into this case—whether its line will be viable and capable of producing the capacity sufficient to substitute for the capacity that the proposed projects will deliver.

Moreover, confidential information is not immune from disclosure.