

**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)

GRAIN BELT EXPRESS' MOTION TO WITHDRAW AND STRIKE TESTIMONY

Grain Belt Express LLC ("Grain Belt Express") pursuant to 20 CSR 4240-2.116(3) and the Commission's general authority, submits its Motion to Withdraw and Strike Testimony and states:

1. On August 5, 2025, the Commission granted Grain Belt Express' Motion to Intervene in this docket.
2. On December 12, 2025, Grain Belt Express filed Rebuttal Testimony for witness Eric Vandenberg ("Vandenberg Testimony").
3. After consideration of this matter and in the interests of judicial economy, Grain Belt Express seeks withdrawal from this proceeding. In so doing, Grain Belt Express requests the Commission to strike the Vandenberg Testimony.
4. There are two pending Motions involving Grain Belt Express. First, Grain Belt Express filed a Motion to Amend the Protective Order to protect the confidentiality of responses provided to data requests issued by Staff that were concurrently filed on the EFIS Data Request Portal. This item remains pending and is addressed in Paragraph 6 of this Motion. Second, Ameren Missouri has a pending Motion to Compel relating to Grain Belt Express' objections to certain data requests propounded by Ameren Missouri. Grain Belt Express feels strongly that its objections to certain data requests were appropriate and Ameren Missouri's Motion to Compel should be denied, but in light of this request to withdraw, the Motion to Compel is moot.

5. Grain Belt Express has conferred with Ameren Missouri and Staff and neither opposes Grain Belt Express' withdrawal or its request to strike the Vandenberg Testimony. It is Grain Belt Express' understanding that, upon its withdrawal, Ameren Missouri will not seek to pursue its Motion to Compel as it will become moot.

6. Despite its Motion to Withdraw and Strike Testimony, Grain Belt Express still seeks a ruling on its Motion to Amend the Protective Order. On January 5, 2025, Grain Belt Express submitted a response to Staff Data Request No. 172 through the EFIS Data Request Portal, portions of which contain Highly Confidential Information for which the pending Motion to Amend the Protective Order seeks protection. Because the Highly Confidential Information has already been provided through EFIS and been available for the parties to view for a full week, the relief sought in the Motion to Amend the Protective Order is still necessary.

7. Grain Belt Express has conferred with Ameren Missouri and Staff and neither party plans to respond to or otherwise oppose Grain Belt Express' Motion to Amend the Protective Order. The deadline for responses to the Motion to Amend the Protective Order is today, January 12, 2026.

WHEREFORE, Grain Belt Express respectfully requests the Commission to allow it withdraw as a party to this proceeding and that the Commission grant the pending Motion to Amend the Protective Order for reasons explained above.

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 12th day of January, 2026.

/s/ Andrew O. Schulte
Andrew O. Schulte