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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2023-0286

SURREBUTTAL TESTIMONY

OF

ROBERT B. DIXON

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

St. Louis, Missouri December, 2023

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SURREBUTTAL TESTIMONY

OF

ROBERT B. DIXON

FILE NO. EA-2023-0286

1		I. INTRODUCTION
2	Q.	Please state your name and business address.
3	А.	Robert B. Dixon, Union Electric Company d/b/a Ameren Missouri
4	("Ameren M	issouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St.
5	Louis, Misso	uri 63103.
6	Q.	Did you file Direct Testimony in this proceeding?
7	А.	No, I did not.
8	Q.	By whom are you employed and what is your position?
9	А.	I am employed by Ameren Missouri as Senior Director, Economic,
10	Community a	and Business Development.
11	Q.	Please describe your educational background and employment
12	experience.	
13	А.	For approximately the last 15 years, my career has focused on driving
14	economic gro	with in Missouri by advancing efforts in economic, community, workforce,
15	and infrastruc	ture development. In October 2021, I joined Ameren Missouri, and I lead our
16	economic, co	mmunity, and business development efforts.
17	Prior	to joining Ameren Missouri, I served as the Director of the Missouri
18	Department o	f Economic Development ("DED") from July 2017 until October 2021. As a

Senate-confirmed member of the Governor's cabinet, I was responsible for leading the state
 agency that oversaw economic and community development, portions of the state's
 workforce development, and tourism, among other areas. During the Covid-19 pandemic,
 I helped lead the state's economic recovery efforts and other initiatives.

During my time as DED Director, I helped lead one of the largest reorganizations 5 in Missouri state government history to bring renewed focus on Missouri's economic 6 development efforts in support of the Governor's economic development priorities. During 7 this period, DED helped bring approximately 3,000 economic, community, and workforce 8 9 development projects to fruition, securing approximately \$5 billion in major investments and the creation or retention of more than 26,000 jobs in Missouri. Three of the most 10 prominent projects that were initiated and announced during my tenure include the General 11 Motors plant expansion in Wentzville, the Nucor Steel mill in Sedalia, and the U.S. 12 Department of Agriculture agency relocations to Kansas City. 13

14 Prior to joining the DED, I served as the President and CEO of the Missouri Community College Association, a professional association of Missouri's 12 community 15 colleges, and in various leadership roles at the Springfield and Hollister, Missouri 16 17 chambers of commerce. I am a U.S. Marine Corps Veteran, who served in Afghanistan immediately after the 9/11 terrorist attacks. I was honorably discharged as a Sergeant after 18 19 five years of service in 2003. I earned a Bachelor of Arts in political science from the 20 University of Missouri – St. Louis and a master's degree in public administration from 21 Missouri State University.

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Q. What are your responsibilities in your current position?

In my current position, my primary responsibilities include leadership and 2 A. execution of strategy in Ameren Missouri's economic, community, and business 3 development efforts. In economic development, Ameren Missouri assists existing 4 customers and prospective new customers that are considering new or expanded operations 5 in our service territory. We work alongside state, regional, and local economic 6 development officials to compete with other locations around the country for new jobs and 7 capital investment in the communities we serve. Our community development team serves 8 9 as the primary point of contact for county and municipal governments to assist them with a variety of issues. Our business development teams focus on customer engagement and 10 electrification strategies. 11

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II. PURPOSE OF TESTIMONY

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to several Staff claims that there is no need for the renewable generation projects proposed in this docket. Among Staff's claims are that the only need claimed is an "amorphous" energy need.¹ Staff also claims that the Company did not present evidence that the facilities are necessary or convenient for the public service, which, as I understand, it is a conclusion that is often guided by the Commission's evaluation of the five *Tartan* Factors, including the factor of "need."² Finally, Staff claims that the Company only claimed the projects are in the public

¹ J. Luebbert Rebuttal Testimony, p. 24,

² Sarah L. K. Lange Rebuttal Testimony, pp. 4 -5.

interest "because Boomtown was approved" and because of "public policy support" for
renewables.³

Q. Is the Staff correct that the Company did not claim the projects were
needed other than on the basis of an energy need?

A. No. Company witness Steven M. Wills' Direct Testimony specifically pointed to the Commission's own reliance in the *Tartan* case on economic development benefits to establish need in that case, and specifically indicated that economic development benefits were one factor supporting a need for the projects at issue in *this* case.⁴ Staff completely ignored this testimony.

Q. Is Staff correct that the Company did not claim that the projects at issue in this case promote the public interest because of their economic development benefits?

A. No. Company witness Mr. Wills' Direct Testimony also specifically discusses the fact that economic development-type benefits support a conclusion that it is in the public interest for the Commission to approve the CCNs sought in this case, including for reasons the Commission itself cited to in its decision in the Boomtown case.

Q. Why do economic development benefits support the need for the projects at issue in this case and support a conclusion that approving CCNs for those projects will promote the public interest?

³ James A. Busch Rebuttal Testimony, p. 22.

⁴ Steven M. Wills Direct Testimony, pp. 7-8, 24.

1	A. There is a critical connection that exists between Missouri's economic
2	development and business retention efforts, the need to approve Ameren Missouri's
3	renewable generation project CCNs, and the overall public interest. Specifically,
4	1. Economic development is in the public interest of the state of Missouri,
5	and
6	2. Economic development prospects are increasingly seeking energy from
7	renewable sources.
8	This means that Ameren Missouri's CCNs for four renewable energy projects will help
9	make Missouri a more attractive location for economic development.
10	Q. Is it the Company's position that the public interest is promoted by
11	approving the projects at issue in this docket simply because Boomtown was
12	approved, or because customers like renewables?
13	A. No. The public interest is promoted by the economic development benefits
14	renewable generation projects produce. Adding renewable generation will help produce
15	those economic development benefits.
16	Q. In general terms, why is economic development beneficial?
17	A. Economic development is clearly in the public interest of the state of
18	Missouri, and it is in the interest of individual Missouri citizens and families. It is through
19	the process of economic development that Missouri competes with other states around the
20	country for a limited number of jobs and investments in our communities. These jobs give
21	Missourians the opportunity to make a living and provide for their families, and they
22	provide additional resources for state and local governments to operate without the need to
23	raise taxes. Economic development ensures that our state's economy continues to thrive.

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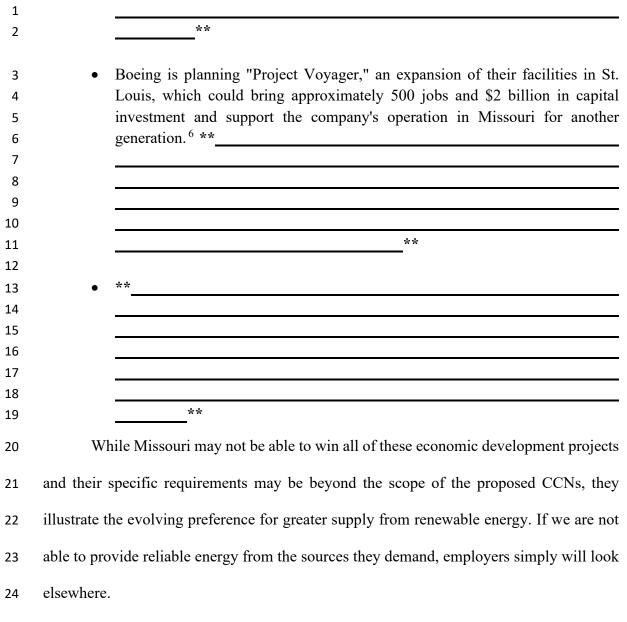
Q. How does renewable generation fit into achieving those benefits?

Missouri has been most successful when we have focused on the 2 A. fundamental building blocks of economic development - workforce development, 3 infrastructure, and ensuring a business-friendly environment that attracts jobs and capital. 4 In today's economy, providing clean, reliable, and affordable energy is included within 5 6 those building blocks. Providing energy from renewable generation sources is part of those building blocks. Increasingly, employers are making investment decisions – decisions on 7 where to locate the next factory that will provide Missouri jobs for another generation -8 9 based on which locations can provide clean, reliable, and affordable energy. The Commission, in its statement of facts in the Boomtown case, agreed. "Access to renewable 10 energy generation is increasingly vital to a region's competitive economic development."⁵ 11 Our state must have a clear plan to deliver that energy to support load and economic 12 growth. 13

Q. Are there specific examples of active economic development projects that demonstrate the customer preference for supply from renewable energy resources that states must be able to meet in order to attract jobs and investment?

17	A.	I can provide several.
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22	_	
23	_	
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⁵ File No. EA-2022-0245, Report & Order, p. 16, issued April 12, 2023.



Q. Is there a need for more renewable energy resources now as Missouri competes for these kind of economic development opportunities?

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A. Absolutely. There is an old saying that the best time to plant a tree is twenty years ago and the second-best time to plant one is today. The same is true about the

⁶ <u>https://www.stltoday.com/news/local/business/boeing-wants-to-build-new-aerospace-programs-in-st-louis-county-add-500-jobs/article_2cde8d44-27d4-11ee-9123-a3decef75e1a.html</u>

1	immediate need for building renewable electric infrastructure to support economic
2	development in Missouri. To be competitive against other states in economic development
3	today, Missouri must immediately move forward with the renewable energy projects under
4	consideration for a CCN. Otherwise, we will certainly be passed by for other states who
5	are already moving ahead with their renewable energy plans.
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Delaying the implementation of additional renewable energy facilities will cause Missouri to fall behind. Prospective economic development projects are evaluating us right now based on our ability to articulate and deliver on a clear plan to provide clean, reliable, and affordable energy.

Q. You noted earlier that when you talk about economic development you include business retention, which is defined as businesses staying where they are or expanding here. How does adding more renewable generation support economic retention?

A. Many of our existing business customers have renewable energy goals that are very important to them, as they express to us often, including the following:

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Table 1: Major Customers with Renewable Energy Goals				
Customer ⁷	Renewable Energy Goals	St. Louis Metro Area Employe		
**	100% by 2030	4,000		
	100% by 2030	4,000		
	50% by 2030	600		
	100% by 2030	15,796		
	100% by 2030	1,340		
	100% by 2025	4,124		
	Net Zero by 2040	3,815		
	100% by 2025	2,500		
	50% by 2030	14,226		
**	50% by 2025, 100% by 2035	17, 500		
Total		63,901		

These customers are some of the largest employers in our state. They provide jobs for nearly 64,000 people in the St. Louis metro alone and indirectly jobs for hundreds of thousands of other Missourians. They bring billions of dollars of capital investment to our communities. Still, the customers indicated in Table 1 are only a sampling of those that have renewable energy goals.

6 Many of our customers have established corporate goals to pursue clean energy and 7 other sustainability initiatives. We know that access to clean, reliable, and affordable 8 energy is a driving factor in where they will make future investments of capital and create

⁷ These customers are Ameren Missouri Renewable Solutions Program subscribers.

- 1 jobs. Approving Ameren Missouri's requests in this case helps to bring those jobs and
- 2 investment to our communities here in Missouri.

3 Q. Does this conclude your surrebuttal testimony?

4 A. Yes.

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 a Certificate of Convenience and Necessity for Solar Facilities

EA-2023-0286

AFFIDAVIT OF ROBERT B. DIXON

STATE OF MISSOURI)) ss CITY OF ST. LOUIS)

Robert B. Dixon being first duly sworn on his oath, states:

My name is Robert B. Dixon, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Surrebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Robert B. Dixon Robert B. Dixon

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Sworn to me this 15th day of December, 2023.