

**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) File No. EA-2023-0286
For Certificates of Convenience and)
Necessity for Solar Facilities.)

SUBMISSION OF RESTORATION PLANS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and in accordance with the Commission's *Order Approving Stipulation and Agreement and Granting Certificate of Convenience and Necessity and Order Granting Certificate of Convenience and Necessity* issued in this docket, hereby submits its plans for restoration of safe and adequate service applicable to the Cass County facility.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, MO Bar #40503
JBL Law, LLC
9020 S. Barry Road
Columbia, MO 65201
Telephone: (573) 476-0050
lowery@jblawllc.com
Wendy K. Tatro, MO Bar #60261
Director and Assistant General
Counsel Ameren Missouri
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

**ATTORNEYS FOR UNION
ELECTRIC COMPANY d/b/a
AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on counsel for all parties of record in this case via electronic mail (e-mail) on this 27th day of January, 2025.

/s/ James B. Lowery

James B. Lowery



POST EMERGENCY INCIDENT ACTIONS

NOTE: This plan outlines steps for restoring a solar site facility only **after** all appropriate actions have been taken for an emergency incident. See respective Emergency Action Sheets for your facility, and **take all necessary steps to ensure personal and site safety before referring to this plan.**

POST-INCIDENT CONFIRMATION

- 1) Assess and confirm the emergency incident is no longer ongoing at the solar facility.
 - Incident Commander or lead on-site employee has stated closeout of emergency actions.
 - Barricades are in place and secure to prevent access to any damaged or unsafe areas of the solar facility. Fencelines and gates have been restored as needed and the perimeters of array blocks have been surveyed via the site truck to ensure security of the facility is maintained.
 - Confirm the actions of all emergency response personnel on site have concluded and that there is no further need for local emergency responses services.

- 2) Contact the Director, Renewable Operations to recount the status on-site. Be prepared to supply the following information:
 - Account of personnel on-site and their safety.
 - Status of emergency services that may have responded and follow-up actions or incidents reports needed.
 - Status of any impacts to array blocks, the operations building, substation, or other affected areas of site.
 - Confirmation that all affected equipment has been electrically isolated.
 - Detailed description of any remaining concerns or support needed.

- 3) Ensure all details of the incident are accurately entered into the operations logbook.



ASSESSMENT FOR RESUMING SAFE OPERATIONS

- 1) Review the following details with the Solar Systems Engineer, Manager of Solar Operations, and Director, Renewable Operations:
 - The apparent cause of the emergency incident. e.g., weather-related event, known equipment issue, event captured by site surveillance.
 - Status of unaffected portions of the equipment and site. Equipment that is available to resume or continue operations uninterrupted and safely.
 - If an apparent cause is known, verify whether it is still a potential threat of re-occurrence to the site.

- 2) If safe and prudent to proceed, develop a near-term plan to restore the site or portions of the site to operations. This plan must include the following:
 - A listing of all equipment that is isolated and/or areas barricaded following the emergency incident.
 - A listing of all equipment that must still be electrically isolated and tagged as out of service following the emergency incident. Such equipment includes all respective combiner boxes, panel tracking system, central inverters, and substation equipment.
 - Switching orders, as needed, to electrically restore the site or portions of the site from the collection substation.
 - Additional resources, supporting organizations, and on-call Solar Technicians needed to support restoration efforts or maintain site control.
 - The anticipated timing of when solar inverters and array block will be available for generation and the expected site capacity available for generation.

- 3) No temporary alterations of equipment or abnormal operating conditions are permitted as part of a near-term to restore site operations. Such measures must first be evaluated as part of an engineering design review.

COMMUNICATE AND NEAR-TERM STEPS

- 1) Dependent on the impact and nature of the emergency incident, the Director, Renewable Operations shall provide an update to Ameren Missouri leadership, Ameren Security, Ameren Safety, Ameren Corporate Communication, and Ameren Regulatory.

- 2) The Manager, Solar Operations shall call the Power Supply Supervisor to communicate any



RESTORATION of SERVICE – CASS COUNTY ENERGY CENTER

POST EMERGENCY INCIDENT ACTIONS

intent to restore or remove equipment from service as a result of the plan assessed above. A follow-up email shall also be sent to document the intended actions at site.

- 3) No further actions shall be taken until additional support personnel are available as determined in the assessed plan.
- 4) Proceed with returning equipment to service per the assessed plan.

LONG-TERM PLANNING AND EVALUATION

- 1) All equipment and areas of the solar facility that pose a hazard to personnel or safe operations shall remain isolated, out of service, and barricaded as necessary.
- 2) If a cause of the emergency incident is not apparent, the Manager of Solar Operations shall initiate a root cause review.
- 3) The Director, Renewable Operations shall ensure the appropriate resources are made available for engineering reviews, ongoing evaluation site conditions, environmental cleanup, and maintaining security and control.
- 4) The Solar Systems Engineer shall initiate and coordinate the design reviews necessary to make temporary alterations or evaluate abnormal operating conditions that would allow site restoration in a more expedited manner.
- 5) The Director, Renewable Operations shall lead initial efforts to establish a project team that addresses any major or anticipated prolonged impacts to overall site availability.
- 6) The Manager of Solar Operations shall conduct a evaluate lessons learned from the emergency incident response, as well as ensure operational changes are implemented as needed from respective lessons learned and the root cause review.