

**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 to Construct, Own,) File No. EA-2025-0028
Operate and Maintain a Transmission Substation in)
Cooper County, Missouri.)

AMENDED APPLICATION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri", "Company", or "Applicant"), pursuant to § 373.170.1 RSMo.¹, 20 CSR 4240-2.060, and 20 CSR 4240-20.045, and hereby submits its Amended Application for an order granting it a certificate of convenience and necessity ("CCN") to 1) construct, install, own, operate, maintain, and otherwise control a new 161 kV substation along with ancillary connecting transmission lines to be located in Cooper County, Missouri; and 2) reconfigure an existing 161 / 69 kV transmission substation located in Cooper County, Missouri. In support of its Amended Application, Ameren Missouri states as follows:

I. APPLICANT

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. Ameren Missouri is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. Ameren Missouri has previously submitted to the Commission a certified copy of its Articles of Incorporation (File No. EA-87-105), its Fictitious Name Registration with the Missouri Secretary of State (File No. EA-

¹ Statutory references are to the Revised Statutes of Missouri (Cum. Supp. 2024), unless otherwise indicated.

2024-0237), and its Certificate of Corporate Good Standing (File No. EA-2024-0237), all of which are incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G).

2. Filings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and to:

Steve Wills
Sr. Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
swills@ameren.com

3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

4. Ameren Missouri has no overdue annual report or assessment fees.

5. A 60-day notice with respect to authority sought herein was filed on July 23, 2024, and assigned the above-captioned file number.

II. THE NEW SUBSTATION, TRANSMISSION LINE FACILITIES, AND RECONFIGURATION OF THE EXISTING SUBSTATION

6. Ameren Missouri currently owns and operates a 161kV / 69kV transmission substation in Overton, Missouri (the "Overton 161kV / 69 kV Substation"). This substation supports several bulk stations and transmission interconnections. Further, it is located in central Missouri and it is expected that there will be future generation interconnection requests in this area in the near- to intermediate-term.

7. The Overton 161kV / 69 kV Substation is currently a 9-position straight bus (one bus with four positions and another bus with five positions), and Ameren Missouri has a need for another terminal position in this area. This new terminal is needed to accommodate an additional

345 kV / 161 kV transformer that will be added to the nearby Overton 345 kV substation. The Overton 161 kV / 69 kV Substation also contains 69 kV equipment.

8. The Overton 161 kV / 69 kV Substation is an aging facility and has experienced five bus trips during the previous 18 years. These bus trips have become more frequent during the past 7 years, averaging one bus trip for every 2.6 years, which is significantly higher than the average for Ameren Missouri's new substations. The reliability of this substation will continue to diminish with the passage of time.

9. To enhance reliability for years to come and provide flexibility to accommodate future generation interconnections, Ameren Missouri plans to remove the 161 kV equipment, with only a few exceptions², from the Overton 161 kV / 69 kV Substation and construct, in its place, a new 9-position, 161kV substation with a breaker-and-a-half configuration, to be located nearby on land owned by Ameren Missouri in Cooper County (the "Cooper Substation"). Several of the existing terminals at the existing Overton 161 kV / 69 kV Substation would be removed and substitute terminals would be installed at the Cooper Substation. The new Cooper Substation would be constructed as a more reliable alternative to expanding the existing Overton 161kV / 69kV Substation to a 10-position straight bus. This new substation will be expandable to accommodate three additional future terminal positions should they be required. A diagram of the Cooper Substation as it will be initially configured is provided in Original Sheet No. COOP-Q-000001-001 in Confidential **Appendix 1**.³

² The Overton Substation will still have equipment to transform voltage from 161kV to 69kV and it will also have a recently-installed 67 MVAR capacitor bank, which operates at 161kV.

³ References to the appendices in this Amended Application are to the appendices submitted with the original Application, which are not being resubmitted. One additional appendix, Supplemental Appendix 1, is being submitted with this Amended Application.

10. The new Cooper Substation will necessitate relocating existing transmission lines, including moving certain line connections from the existing Overton 161kV / 69kV Substation to the new Cooper Substation, and building new transmission lines as necessary to connect the new Cooper Substation to the transmission grid.

11. Additionally, Ameren Missouri will make certain changes to the existing Overton 161 kV / 69 kV Substation (which will become a 69 kV substation⁴), including among other things, reconfiguring the 69 kV equipment and installing new circuit breakers and breaker disconnect switches as well as modifications to system relaying.

12. The items described in paragraphs 9 through 11 above (collectively, the "New Facilities") are located outside of Ameren Missouri's retail service territory, meaning that the New Facilities constitute an asset within the meaning of 20 CSR 4240-20.045(1)(A)(2). The location of the New Facilities is shown on **Appendix 2** and incorporated herein by this reference.

13. The New Facilities will be constructed upon land that is mostly owned by Ameren Missouri and located on or near the existing Overton 345 kV substation and the existing Overton 161 kV / 69 kV Substation in Cooper County. A portion of the New Facilities (specifically, the connecting transmission lines for the Cooper Substation) will be built on land owned by others and over which Ameren Missouri will obtain easements, as shown in Confidential **Appendix 3**.

14. The new Cooper Substation will also necessitate relocating a transmission line owned and operated by Columbia Water & Light, which currently connects to the existing Overton 161 kV / 69 kV Substation. Columbia Water & Light and Ameren Missouri have agreed that Ameren Missouri will perform this line relocation work on behalf of Columbia Water & Light,

⁴ With the exception of certain 161kV equipment that will remain, as described *supra*.

with the cost of the work to be included in the Cooper Substation costs since the Cooper Substation construction necessitated the line relocation.

15. The estimated cost of the New Facilities, inclusive of the associated new and relocated connecting transmission lines, is estimated to be \$50 million, inclusive of the cost of labor, materials, allowance for funds used during construction, applicable overheads, and contingency. Not included in this estimated cost is the cost to build one of the nine terminals for the new Cooper Substation, estimated at \$1,797,000 in 2022 dollars, which will be paid by one of Ameren Missouri's interconnection customers.⁵

III. REQUEST FOR A CCN

16. Ameren Missouri requests that it be granted a CCN to construct, own, operate and maintain the New Facilities. As explained above, the New Facilities will promote grid reliability by 1) avoiding more frequent bus trips that are expected to occur in the absence of the New Facilities; and 2) the New Facilities will also enhance operational flexibility and mitigate the impact of any bus trips that do occur. The New Facilities will also facilitate the interconnection of additional generation capacity in central Missouri.

17. The "Tartan Factors,"⁶ typically relied upon by the Commission in evaluating CCN requests, support issuance of a CCN, as follows:

- a. The operation and maintenance of the New Facilities is needed for the reasons given above.

⁵ This interconnection customer, Grain Belt Express LLC, is required to pay the cost of one of the Cooper Substation's terminals under a Facilities Construction Agreement between Ameren Missouri, the Midwest Independent System Operator, Inc. ("MISO"), and Grain Belt Express LLC.

⁶ While a project is not required as a matter of law to meet the "Tartan Factors," the Commission has traditionally analyzed CCN applications using those factors. *See In Re Tartan Energy*, GA-94-127, 3 Mo. P.S.C.3d 173, 177 (1994).

- b. The operation and maintenance of the New Facilities is economically feasible for multiple reasons. First, as the Commission has recognized, since the New Facilities are needed, economic feasibility generally turns on the Company's ability to finance the New Facilities, which it has, as addressed below. Second, as discussed below, the New Facilities' equipment and construction are being procured/performed in accordance with the Company's procurement procedures and policies, including competitive bidding requirements reflected therein. Third, the New Facilities will create additional jobs, additional tax revenues, and economic development by way of constructing the New Facilities and providing an available interconnection for future generation projects in central Missouri. Additionally, a portion of the cost of the New Facilities will be subsidized by one of Ameren Missouri's interconnection customers.⁷
- c. Ameren Missouri has the financial ability to own, operate, and maintain the New Facilities, which are estimated to cost approximately \$50 million, which is a small fraction of both a) Ameren Missouri's existing rate base of over \$11 billion, and b) Ameren Missouri's planned capital additions over the next five years, which also exceed \$11 billion. Moreover, the Company has sufficient access to capital markets based on, among other things, its stable credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies, respectively.
- d. Ameren Missouri is qualified to own, operate, and maintain the New Facilities given that it has developed, owns, and operates numerous transmission substations and thousands of miles of electric transmission lines.

⁷ See ¶ 15, *supra*.

- e. Operation and maintenance of the New Facilities is in the public interest for the reasons discussed herein. It should be noted that because factors "a" through "d" are satisfied, the Commission would generally conclude, without more, that factor "e", the public interest, is also served by granting the CCN.⁸

The foregoing facts demonstrate that issuance of a CCN for the New Facilities is required by the public convenience and necessity.

IV. SPECIFIC REQUIREMENTS APPLICABLE TO CCN APPLICATIONS FOR NEW ASSETS

18. Depictions of the proposed locations for the New Facilities are found in the supplement to **Appendix 1** and in **Appendix 2**. 20 CSR 4240-20.045(6)(A).

19. The New Facilities will not cross any gas or telephone lines of any utility companies (regulated or nonregulated), nor will the New Facilities cross any railroad tracks or underground facilities, as defined in § 319.015 RSMo. 20 CSR 4240-20.045(6)(B).

20. The New Facilities will cross an electric distribution line, believed to be owned by Columbia Water & Light. This distribution line is located on the north side of Highway 179 at or about latitude 38°55'27.12" N and longitude 92°34'28.48" W. 20 CSR 4240-20.045(6)(B).

21. In addition, the new and re-routed transmission lines for the New Facilities will cross two 69 kV subtransmission electric utility lines, which run parallel to each other, owned and operated by Ameren Missouri. 20 CSR 4240-20.045(6)(B).

22. A list of plans and specifications for construction of the New Facilities are provided in the Supplement to **Appendix 1**, and certain drawings and specifications are provided in Confidential **Appendix 1**.⁹ 20 CSR 4240-20.045(6)(C).

⁸ *Tartan Energy*, 3 Mo. P.S.C. 3d at 189 (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. 554, 561 (1991)).

⁹ The attached plans and specifications are preliminary and still underdevelopment.

23. Ameren Missouri estimates that construction of the New Facilities will cost approximately \$50 million.¹⁰ 20 CSR 4240-20.045(6)(C).

24. Ameren Missouri intends to commence construction of the New Facilities in 2025, beginning with construction of a temporary transmission line in July and progressing to construction of permanent facilities in late 2025 or early 2026. Ameren Missouri anticipates that the New Facilities will be fully operational by December 1, 2027. 20 CSR 4240-20.045(6)(D).

25. Ameren Missouri anticipates that no portion of the New Facilities will be shared with any other plant. 20 CSR 4240-20.045(6)(E).

26. Ameren Missouri will finance its investment in the construction of the New Facilities through existing funds in its treasury. 20 CSR 4240-20.045(6)(F).

27. Construction of the New Facilities is not inconsistent with Ameren Missouri's current Preferred Resource Plan. 20 CSR 4240-20.045(6)(G).

28. Ameren Missouri plans to use a competitive bidding process for the construction of the New Facilities. Specifically, a competitive sourcing process will be used to secure bids for outside labor, and for materials and equipment necessary to construct the New Facilities that includes: (i) formation of a contract development team to identify and write the scope of work to be completed, identification of qualified contractors for bidding and the criteria for selecting contractors; (ii) evaluation of the statements of qualifications and bids received from bidders; and (iii) negotiation of the terms and conditions most favorable to Ameren Missouri. 20 CSR 4240-20.045(6)(H).

29. Once the New Facilities are complete, Ameren Missouri will operate and maintain the New Facilities in the same manner and fashion as it does all of its transmission lines and electric

¹⁰ As noted above, this does not include the cost of one terminal which is the responsibility of an interconnection customer.

transmission substations. The substations will be operated from a primary control center that will conduct all operational switching and coordination with adjacent and interconnected systems. The New Facilities will be continuously monitored through SCADA by the control center. The control center is staffed around-the-clock by system operators that are certified by NERC. The system operators are required to maintain their certification through a combination of computer-based training and live system simulation drills. In order to minimize any potential disruption to operating the transmission system, backup control centers are also in place in the unlikely event that the primary control center must be evacuated. All maintenance will be performed by Ameren Missouri or Ameren Services employees, or contractors retained by them in the same manner and fashion as maintenance is performed on other Ameren Missouri substations. All transmission substations are inspected routinely, and the individual equipment contained therein (breakers, etc.) is subject to an internal substation maintenance strategy, which specifies equipment-specific maintenance expectations. Substation equipment is maintained to meet or exceed the requirements set by NERC and documentation verifying compliance is maintained. Additionally, the intervals at which maintenance activities are performed and the scope of work executed on any maintenance projects or visits are documented. 20 CSR 4240-20.045(6)(I).

30. After the transmission lines (new and re-routed) are placed into service, various Ameren Services transmission maintenance and management groups (line, substation, vegetation) will follow a routine cycle of patrols and coordinate scheduled maintenance. These patrols will be a combination of aerial patrols and foot patrols as defined by internal maintenance standards. Any maintenance issues identified during the patrols will be given priority as provided by internal maintenance standards and a remediation action will be scheduled based upon that priority. Ameren Services will then identify the labor resources necessary to address the remediation. In

general, Ameren Services has a complete and robust line maintenance program that is defined by and subject to numerous internal standards, including those governing the routine patrol of assets and providing expectations around the repair of any issues that are identified. 20 CSR 4240-20.045(6)(I).

31. Ameren Missouri follows documented processes governing responses to unplanned outages. In the event of an unplanned outage, subject matter experts will be assigned to review the outage data, utilize fault location information to determine distance to fault, dispatch field resources to assess damage, and determine material and labor resources (internal and external) necessary for the safest and most efficient restoration. 20 CSR 4240-20.045(6)(J).

32. An affidavit certifying compliance with the notice requirements to landowners directly affected by the routes and locations of the New Facilities, as required by 20 CSR 4240-20.045(6)(K), is included in **Appendix 3** to this Application. The affidavit includes a list of all directly affected landowners to whom notice was sent.¹¹ 20 CSR 4240-20.045(6)(K).

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant it a Certificate of Convenience and Necessity to construct, own, operate, and maintain the New Facilities, pursuant to § 393.170.1, to be effective on or before July 15, 2025.

¹¹ Ameren Missouri filed confidential and public versions of Appendix 3. The confidential version contains the names and addresses of landowners and is confidential pursuant to 20 CSR 4240-2.135(2)(A)(1).

Respectfully submitted,

/s/ William D. Holthaus, Jr.

William D. Holthaus Jr., #63888

Senior Corporate Counsel

Ameren Missouri

Wendy K. Tatro, #60261

Director and Assistant General
Counsel

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-3484 (phone)

(314) 554-4014 (fax)

AmerenMOService@ameren.com

James B. Lowery, #40503

JBL Law, LLC

9020 South Barry Road

Columbia, MO 65201

(573) 476-0050

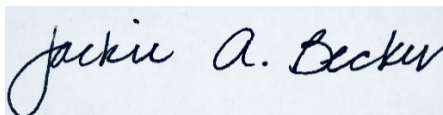
lowery@jblawllc.com

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

DECLARATION

The undersigned, being first duly sworn and upon her oath, hereby states that the foregoing *Amended Application* is true and correct to the best of her knowledge, information, and belief.

This request is substantially consistent with Ameren Missouri's current preferred resource plan required by 20 CSR 4240-Chapter 22.

A rectangular box containing a handwritten signature in black ink that reads "Jackie A. Becker".

Jackie Becker, Vice-President
Engineering and Construction
Union Electric Company d/b/a Ameren Missouri

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 12th day of February, 2025.

/s/ William D. Holthaus, Jr.
William D. Holthaus, Jr.