

*Exhibit No.:*  
*Issue(s):* *In-Service Criteria*  
*Witness:* *Brodrick Niemeier*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal / True-Up*  
*Direct Testimony*  
*Case No.:* *ER-2024-0319*  
*Date Testimony Prepared:* *February 14, 2025*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENGINEERING ANALYSIS DEPARTMENT**

**TRUE-UP DIRECT TESTIMONY**

**OF**

**BRODRICK NIEMEIER**

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

**CASE NO. ER-2024-0319**

*Jefferson City, Missouri*  
*February 2025*

**\*\* Denotes Confidential Information \*\***

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BRODRICK NIEMEIER  
UNION ELECTRIC COMPANY,  
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1 **TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **BRODRICK NIEMEIER**

4 **UNION ELECTRIC COMPANY,**  
5 **d/b/a Ameren Missouri**

6 **CASE NO. ER-2024-0319**

7 Q. Please state your name and business address.

8 A. My name is Brodrick Niemeier and my business address is Public Service  
9 Commission, P.O. Box 360, Jefferson City, MO 65102.

10 Q. Are you the same Brodrick Niemeier that filed direct testimony in this case?

11 A. Yes.

12 Q. What is the purpose of your true-up direct testimony?

13 A. The purpose of my true-up testimony is to discuss the in-service status and  
14 inclusion of the Huck Finn, Boomtown, and Cass County Solar facilities in Ameren Missouri's  
15 rate base.

16 **HUCK FINN IN-SERVICE**

17 Q. Are all major construction items for Huck Finn complete?

18 A. Yes. Huck Finn was documented as being substantially complete on  
19 December 9, 2024, and was verified by Ameren on December 13, 2024.<sup>1</sup> Substantially  
20 complete is a milestone in a construction project that means a project is ready for its intended  
21 use though additional work on the project may be remaining.

22 Q. Has Huck Finn completed all its pre-operational tests?

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<sup>1</sup> According to BTA substantial completion certificate, part of Ameren's response to Staff DR 0560.

True-Up Direct Testimony  
of Brodrick Niemeier

1 A. Yes. Ameren Missouri has submitted documentation verifying that Huck Finn  
2 has passed all preoperational tests.

3 Q. Have all contractual operational guarantees for Huck Finn been met?

4 A. Yes. Ameren Missouri has represented that Huck Finn meets all contractual  
5 operational guarantees.<sup>2</sup>

6 Q. Has Huck Finn been operational for at least 72 consecutive hours, when the sun  
7 is shining?

8 A. Yes. During its capacity tests, Huck Finn was operational from  
9 November 21, 2024, through November 27, 2024, while sunlight was present.

10 Q. Did Huck Finn pass its in-service capacity test?

11 A. Yes. During non-summer months, solar installations generally have reduced  
12 maximum capacities. This is due to the Earth's tilt causing sunlight to hit solar panels more  
13 directly in summer and less directly in winter. After adjusting for the time of year, the average  
14 capacity of Huck Finn is expected to be approximately 238 MWs \*\* [REDACTED]

15 [REDACTED] \*\*. This exceeds the 95% of 200 MW capacity test requirement.

16 Q. Does Huck Finn have the required interconnection facilities and required  
17 agreements to generate electricity and serve load?

18 A. Yes. Ameren has provided the Huck Finn Generator Interconnection Agreement  
19 ("GIA")<sup>3</sup> \*\* [REDACTED] \*\* and verifies  
20 that sufficient interconnection facilities are in place.

21 Q. Does Staff conclude that Huck Finn is fully operational and used for service?

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<sup>2</sup> Ameren Response to Staff Data Request 0560, supplied via a disk.

<sup>3</sup> The GIA was included in Ameren's response to Staff DR 0562.

1 A. Yes. Staff concludes that Huck Finn is fully operational and used for service as  
2 of December 13, 2024.

3 **BOOMTOWN IN-SERVICE**

4 Q. Are all major construction items for Boomtown complete?

5 A. Yes. Boomtown received its substantially complete certification on  
6 December 17, 2024. Substantially complete is a milestone in a construction project that means  
7 a project is ready for its intended use though additional work on the project may be remaining.

8 Q. Has Boomtown completed all its pre-operational tests?

9 A. Yes. Ameren has provided documentation confirming that all preoperational  
10 tests are complete.

11 Q. Have all contractual operational guarantees for Boomtown been met?

12 A. Yes. Ameren Missouri has represented that Boomtown meets all contractual  
13 operational guarantees.<sup>4</sup>

14 Q. Has Boomtown been operational for at least 72 consecutive hours, when the sun  
15 is shining?

16 A. Yes. Boomtown operated continually, while the sun was shining, from  
17 October 28, 2024, through October 31, 2024.

18 Q. Did Boomtown pass its in-service capacity test?

19 A. Yes. After adjusting for the time of year, the average capacity of Boomtown  
20 can be expected to be approximately 177 MWs. This exceeds the 95% of 150 MW capacity  
21 test requirement.

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<sup>4</sup> Ameren Response to Staff Data Request 560, supplied via a disk.

1 Q. Does Boomtown have the required interconnection facilities and required  
2 agreements to generate electricity and serve load?

3 A. Yes. Ameren has confirmed that the required interconnection facilities exist<sup>5</sup>  
4 and has supplied Staff with the GIA agreement.

5 Q. Does Staff conclude that Boomtown is fully operational and used for service?

6 A. Yes. Staff concludes that Boomtown is fully operational and used for service as  
7 of December 16, 2024.

8 **CASS COUNTY IN-SERVICE**

9 Q. When was the Cass County solar facility completed?

10 A. Cass County's In-service Capacity Test Report and Substantial Completion  
11 Certificate were both issued on December 17, 2024. Substantially complete is a milestone in a  
12 construction project that means a project is ready for its intended use though additional work  
13 on the project may be remaining.

14 Q. Has Cass County completed all its pre-operational tests?

15 A. Yes. Ameren has provided documentation proving that all preoperational tests  
16 are complete.

17 Q. Have all contractual operational guarantees for Cass County been met?

18 A. Yes. Ameren Missouri has represented that Cass County meets all contractual  
19 operational guarantees.<sup>6</sup>

20 Q. Has Cass County been operational for at least 72 consecutive hours, when the  
21 sun is shining?

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<sup>5</sup> Ameren Response to Staff Data Request 0563

<sup>6</sup> Ameren Response to Staff Data Request 0560, supplied via a disk.

1 A. Yes. Staff has received data confirming that Cass County was in continuous  
2 operation, while the sun was shining, from November 5, 2024, through November 11, 2024.

3 Q. Did Cass County pass its in-service capacity test?

4 A. Yes. After adjusting for the time of year, the average capacity of Cass County  
5 is expected to be approximately 178 MWs \*\* [REDACTED]

6 [REDACTED] \*\*. This exceeds the 95% of 150 MW capacity test requirement.

7 Q. Does Cass County have the required interconnection facilities and required  
8 agreements to generate electricity and serve load?

9 A. Yes. Ameren has confirmed sufficient interconnection facilities are present at  
10 the Cass County site and has provided Staff with the GIA document, \*\* [REDACTED]

11 [REDACTED]  
12 [REDACTED] \*\*. <sup>7</sup>

13 Q. Does Staff conclude that Cass County is fully operational and used for service?

14 A. Yes. Staff concludes that Boomtown is fully operational and used for service as  
15 of December 17, 2024.

16 **SUMMARY**

17 Q. Has Staff visited any of these sites to verify that they are in-service?

18 A. Yes. Staff attempts to visit new generation facilities during its in-service  
19 evaluation and on January 28, 2025, I participated in a site visit to the Huck Finn site to verify  
20 it being in-service.

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<sup>7</sup> Case No. EA-2023-0286. Scott Wibbenmeyer Direct Testimony, Schedule SW-D4.

True-Up Direct Testimony  
of Brodrick Niemeier

1           Q.     Should Huck Finn, Boomtown, and Cass County be included in Ameren  
2 Missouri's rates in this case?

3           A.     Yes. All three solar facilities have met their in-service requirements and are  
4 fully operational and used for service.

5           Q.     Does this conclude your true-up direct testimony?

6           A.     Yes it does.



**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company            )  
d/b/a Ameren Missouri's Tariffs to Adjust        )  
Its Revenues for Electric Service                )            Case No. ER-2024-0319

**AFFIDAVIT OF BRODRICK NIEMEIER**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE         )

**COMES NOW BRODRICK NIEMEIER** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-up Direct Testimony of Brodrick Niemeier*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**BRODRICK NIEMEIER**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 4<sup>th</sup> day of February 2025.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
\_\_\_\_\_  
Notary Public