

Exhibit No.:  
Issue(s): Economic Development  
Witness: Robert B. Dixon  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Union Electric Company  
File No.: ET-2025-0184  
Date Testimony Prepared: May 14, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. ET-2025-0184**

**DIRECT TESTIMONY**

**OF**

**ROBERT B. DIXON**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**D/B/A AMEREN MISSOURI**

**St. Louis, Missouri  
May, 2025**

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**DIRECT TESTIMONY**

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**I. INTRODUCTION**

**Q. Please state your name and business address.**

A. Robert B. Dixon, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

**Q. By whom and in what capacity are you employed?**

A. I am employed by Ameren Missouri as Senior Director, Economic, Community and Business Development. In my current position, my primary duties and responsibilities include leadership and execution of strategy in Ameren Missouri's economic, community, and business development efforts. In economic development, Ameren Missouri assists existing customers and prospective new customers that are considering new or expanded operations in our service territory. We work alongside state, regional, and local economic development officials to compete with other locations around the country for new jobs and capital investment in the communities we serve. Our community relations team serves as the primary point of contact for county and municipal governments to assist them with a variety of issues.

1           **Q.     Please describe your education, experience, and employment history.**

2           A.     My career has focused on driving economic growth in Missouri by advancing  
3 efforts in economic, community, workforce, and infrastructure development. In October 2021, I  
4 became Ameren Missouri's Director of Economic and Community Development, leading our  
5 coworkers and strategy in these areas to serve our customers and communities. Prior to joining  
6 Ameren Missouri, I served as the Director of the Missouri Department of Economic Development  
7 ("DED") from July 2017 until October 2021. As a Senate-confirmed member of the Governor's  
8 cabinet, I was responsible for leading the state agency that oversaw economic and community  
9 development, portions of the state's workforce development, and tourism, among other areas.  
10 During the Covid-19 pandemic, I helped lead the state's economic recovery efforts and other  
11 initiatives.

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

20           Prior to joining the DED, I served as the President and CEO of the Missouri Community  
21 College Association, a professional association of Missouri's 12 community colleges, and in  
22 various leadership roles at the Springfield and Hollister, Missouri Chambers of Commerce. I am  
23 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 five years of service in 2003. I earned a Bachelor of Arts in Political Science from the University of Missouri – St. Louis and a Master's Degree in Public Administration from Missouri State University.

**Q. Have you previously testified in a proceeding at the Missouri Public Service Commission or before any other utility regulatory agency?**

A. Yes. I have served as a witness on behalf of Ameren Missouri in previous proceedings before the Missouri Public Service Commission.

**Q. What is the purpose of your direct testimony in this proceeding?**

A. My testimony outlines the economic development rationale for pursuing new and expanding large load customers. I will cover the following topics in my testimony:

- Economic Development Considerations: An overview of the broader context in which Missouri is competing for new jobs and investment, with a primary focus on how energy considerations are driving site selection decisions. Increasingly, access to clean, reliable, and affordable energy is an important factor that determines success in economic development. Due to the rapid and significant growth in the technology and manufacturing sectors, businesses are seeking access to more energy than ever before. In addition to their need for a large amount of power, these businesses are increasingly seeking clean and carbon-free energy sources. States and communities that meet these needs will be viable locations for economic development. Those regions that cannot are likely to be left behind.
- Recent Trends in Large Load Economic Development: An overview of the current economic development opportunities that are currently considering Missouri locations, with a primary focus on the significant changes in electric requirements to serve these

1 customers. Missouri's recent experience in economic development mirrors the same  
2 trends that are playing out across the country. Individual economic development  
3 prospects are requesting more power than ever before, with some needing more than  
4 1,000 megawatts ("MW") each. As of the end of 2024, the average requested electric  
5 demand by an economic development prospect was nearly 190 MW, up from just over  
6 three megawatts in 2019. The Large Load Rate Plan proposed in this docket creates a  
7 framework to obtain firm commitments from these prospects who are considering a  
8 location in Missouri.

- 9 • Benefits of Large Load Economic Development: An overview of the economic and other  
10 benefits of attracting large load customers to Missouri. In addition to the thousands of  
11 construction and permanent jobs and workforce development that are stimulated by large  
12 load economic development projects, the state of Missouri and its communities stand to  
13 gain millions of dollars in additional revenues through economic growth.

14 **Q. You've used the phrase "large load customers." How are you defining that**  
15 **phrase?**

16 A. I am defining it in the context of the tariff filing that this testimony supports. That  
17 is, a customer whose load is expected to be 100 MW or more that will be served at a  
18 transmission level voltage of at least 115 kilovolts ("kV"). Company witness Steve Wills  
19 addresses the rationale for those defining parameters in his direct testimony. Mr. Wills' Direct  
20 Testimony also discusses the details of the tariff changes the Company is proposing in this case,  
21 which I will refer to collectively as the "Large Load Rate Plan."

1                   **II.       ECONOMIC DEVELOPMENT CONSIDERATIONS**

2           **Q.       Is electricity an important factor in supporting economic development**  
3 **success?**

4           A.       Yes. As I address further below, the availability of a clean, reliable, and affordable  
5 energy supply is increasingly a key factor when new businesses, and especially prospective large  
6 load customers, consider where to locate new facilities.

7           **Q.       Please describe the typical process prospective customers go through in**  
8 **choosing where to site a new facility.**

9           A.       When considering where to locate a new facility, businesses will often conduct a  
10 formal site selection process to evaluate and compare different geographic areas to identify the  
11 best location for their operation. Generally, that process begins with extensive research by the  
12 business and/or its professional external site selection consultants to determine a broad region in  
13 which to begin their search. This may include several states (e.g., Missouri, Kansas, Arkansas, or  
14 Illinois), a region (e.g., the Midwest or the Southeast U.S.), or even national or international areas  
15 (e.g., the entire U.S. or North America). Having established their initial search parameters, they  
16 will then contact state and/or local economic development agencies to solicit information about  
17 the communities or specific sites within them.

18           As they conduct this site selection process, businesses are evaluating each location on a  
19 variety of factors, primarily related to issues involving a location's workforce, infrastructure, real  
20 estate, overall business climate, impact on business operations, and incentives – and as noted above,  
21 related to the availability of a clean, reliable, and affordable energy supply.

22           In economic development, a state or a region's goal is to avoid being eliminated from a site  
23 selection process by demonstrating that it is the best overall location for a particular business to  
24 succeed compared to the other possible locations it could have chosen. The states and regions that

1 are successful in attracting new jobs and investment are those that continue to enhance their  
2 competitiveness across a range of factors that impact site selection and business growth year after  
3 year.

4 The stakes are high for Missouri's citizens and communities, and we must continue to  
5 enhance our competitiveness as an attractive location for new jobs and investment. Missouri's  
6 competitor locations around the country continue to adapt and evolve their economic development  
7 offerings, including their energy supply policies to keep up with the evolving business priorities  
8 in the economy. Missouri cannot afford to fall behind by disregarding the factors that drive job  
9 growth and investment.

10 **Q. Please elaborate on the importance of energy supply to businesses seeking to**  
11 **establish or expand locations in a given state.**

12 A. Access to electric energy is increasingly top of mind for customers, and this access  
13 may be the key economic development differentiator between states and service territories based  
14 on (a) how quickly electric service providers can make the progress needed to meet customers'  
15 expectations, and (b) whether the terms of the electric supply meet the businesses' need for reliable  
16 and competitive supply and, as noted, a supply that will contribute to many of these business's  
17 clean energy goals.

18 As noted above, businesses often employ professional site selection consultants to facilitate  
19 their location search and decision-making process. *Area Development Magazine*, a prominent  
20 economic development industry trade publication, recently released the results of their 21<sup>st</sup> Annual  
21 Consultants Survey, measuring the sentiment among these site selectors. In Q1 2025, 100% of the  
22 respondents listed energy availability as “very important” or “important,” making this the top



1 factor in site selection today according to this long-running survey<sup>1</sup>. Similarly, the Site Selectors  
2 Guild, a professional trade association representing the top consultants in this field, recently  
3 published a survey report outlining the factors by which businesses are making site location  
4 decisions. This *State of Site Selection* report found that utilities and infrastructure considerations  
5 were the second most important factor (74%) in determining where new businesses will locate,  
6 behind only workforce and labor availability at 76%. When considering the location of new  
7 industrial businesses, they rank utilities and infrastructure as the single most important factors  
8 (79%) in determining site selection, with availability of sufficient electric power capacity having  
9 the most significant impact on the success of these projects.<sup>2</sup> According to the Site Selectors  
10 Guild:

11 *Large industrial projects face a significant challenge of meeting*  
12 *their energy demands, and 98 percent of Guild members believe*  
13 *access to sufficient electric capacity will significantly impact the*  
14 *future of industrial projects. The strain on electric grids in the*  
15 *United States has intensified due to ... construction spending on new*  
16 *manufacturing facilities more than doubling from 2022 to 2023. ...*  
17 *Globally, governments and utilities need to add or replace the*  
18 *equivalent of virtually all the world's power grids by 2040 to shore*  
19 *up reliability.*<sup>3</sup>

20 Similarly, Missouri-based Burns & McDonnell's site selection advisory practice recently  
21 published a white paper further outlining the challenges and interconnectedness of a state's success

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<sup>1</sup> [39th Annual Corporate & 21st Annual Consultants Surveys: What Business Leaders and Consultants Are Saying About Site Selection - Area Development.](#)

<sup>2</sup> The State of Site Selection 2024. Site Selectors Guild and DCI.

<sup>3</sup> Ibid.

1 in economic development with adequate infrastructure and energy policies. According to authors  
2 Courtney Dunbar and Stephanie Villarreal,

3 *The availability and dependability of power have rarely been*  
4 *determining factors when choosing the site for a new industrial*  
5 *facility, but that is changing. The push for carbon neutrality,*  
6 *coupled with increased anticipated power demand and higher*  
7 *penetration of renewables, has made power reliability a key factor,*  
8 *triggering a tectonic shift in the site selection landscape.*<sup>4</sup>

9 Dunbar and Villarreal further outline the significant increase in infrastructure expectations of  
10 large-scale industrial customers in the table below. Note the 14-fold increase in electric demand,  
11 which is now a “primary consideration,” for large industrial businesses, which not only includes  
12 data centers but also large manufacturers. See Figure 1 below for a summary of some key  
13 infrastructure considerations for these kinds of customers.

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<sup>4</sup> Skyrocketing Demand for Renewable Energy is Transforming Site Selection, by Courtney Dunbar and Stephanie Villarreal. Burns & McDonnell

1 **Figure 1: Infrastructure Capacity Demands for a  
Typical 1,000 Acre-plus Site, Past and Present.<sup>5</sup>**

	<b>Before</b>	<b>Now</b>
Developable acres	800 contiguous acres	800 acres, not necessarily contiguous
Rail	Required	Varies according to needs and ESG goals
Highway	Four-lane access within 5 miles	Four-lane access within 5 miles
Water	0.75 MGD	35 MGD
Wastewater	0.6 MGD	30 MGD
Natural gas	35,000 mcf/month	35,000 mcf/month
<b>Electricity</b>	<b>50 MW of redundant, 3-phase electric</b>	<b>700 MW of redundant, 3-phase electric</b>
<b>Power source</b>	<b>Secondary consideration</b>	<b>Primary consideration</b>

2 **Q. Why have issues related to electricity become such an important**  
3 **consideration in determining success in economic development?**

4 A. Company witness Ajay Arora's Direct Testimony provides an extensive  
5 discussion about the broader context in which technological change in the economy is driving  
6 load growth across multiple sectors. From an economic development perspective, this presents  
7 additional opportunities for Missouri to attract new jobs and investment. Due to a variety of  
8 factors, the U.S. may see an increase in “re-shoring” manufacturing operations here<sup>6</sup>, and  
9 manufacturing is increasingly becoming automated<sup>7</sup>, which generally requires additional electric  
10 load to power the equipment. Additionally, with the growth in data computing to support  
11 virtually every aspect of modern life and business, technology companies are investing heavily in  
12 both traditional cloud computing data centers, as well as new power-intensive artificial

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<sup>5</sup> Ibid.

<sup>6</sup> [A brighter future for "Made in America" | McKinsey](#)

<sup>7</sup> [Adopting AI in manufacturing at speed and scale | McKinsey](#)

1 intelligence data centers. The technology sector is rapidly expanding to account for this. They are  
2 increasing not only the size and number of their individual data centers, but they are also seeking  
3 additional geographic diversity where they locate them.

4 As discussed below, we have seen this trend reflected in the significant increase in  
5 electric load requests from large manufacturers and data centers who are interested in locating in  
6 Missouri. All of this presents opportunities for growing Missouri's economy, but it requires that  
7 we have policies in place to responsibly do so. These include broader state and local government  
8 policies, as well as having in place appropriate utility service and program tariffs, while utilizing  
9 appropriate resource planning and resource implementation to meet the needs of these customers.

10 **Q. What other energy characteristics are large customers seeking, beyond just**  
11 **the ability to serve their high demand?**

12 A. Large, power-intensive businesses like data centers and manufacturers are  
13 sophisticated customers who desire locations that can satisfy not just their demand for power but  
14 also satisfy their broader energy-related needs.

15 The first of these needs is to ensure the availability of power and system reliability, which  
16 are crucial in competing with other locations to attract these economic development  
17 opportunities. To accommodate the need for available and reliable power, Ameren Missouri  
18 recently adopted a new Preferred Resource Plan, outlining a balanced portfolio of resources to be  
19 implemented on a timeline that will allow it to serve the significant new load we expect to see in  
20 the near- to intermediate term, as well as to continue to serve our existing customers with  
21 additional dispatchable resources to ensure system reliability. More details on this plan are  
22 provided in Matt Michels' Direct Testimony.

1           Large customers' energy-related needs go beyond power availability and reliability. This  
2   is true of both existing large customers and prospective ones. Specifically, large customers  
3   strongly desire to be served by a utility whose power supply is of course reliable but that also  
4   reflects an appropriate and significant proportion of energy from clean energy resources. In fact,  
5   many of these customers have goals to be served by 100% carbon free energy in the not-too-  
6   distant future. Anyone that is concerned about the future of Missouri's economy should consider  
7   our renewable energy generation policies and the implications of these business community  
8   priorities as a signal of future investment decisions, as the ability of Missouri utilities to deliver  
9   clean energy will be an important factor in our economic development success. Some of our  
10   existing customers are leading employers in Missouri and around the country who are competing  
11   on a global stage, and they are expressly communicating their energy preferences that they  
12   believe will help them succeed. The same is true of the prospective large load customers who are  
13   driving this filing. Such customers will evaluate locations based on their ability to obtain reliable  
14   power but also to meet their clean energy goals at a fair cost.

15           Ameren Missouri's experience to date with our largest customers reinforces this  
16   experience in our own state. For example, 35% of our largest customers (and thus, job creators in  
17   Missouri) have sustainability goals. Of those, 50% have a focus on carbon reduction and 30%  
18   have a focus on renewable energy. GM has a target to power 100% of their electricity from  
19   renewable sources by 2025. Boeing has targets to reach net-zero emissions by 2030, and  
20   Emerson's goal is to reach 100% renewable energy by 2030. These are three of the largest  
21   manufacturers in Missouri, and they depend on Ameren Missouri to help them succeed in our  
22   state. Notably, many of these customers are participants in the Renewable Solutions Program.

1           Large data center operators also prioritize clean energy resources. Amazon set a target to  
2   match 100% of their electric consumption with renewable energy resources by 2030, but they  
3   accomplished this ahead of schedule by 2023.<sup>8</sup> Similarly, Google has a goal to reach net-zero  
4   carbon emissions by 2030, as well as a target to reach 24-by-7 hourly matching of their  
5   operation’s electric load with output from clean energy resources.<sup>9</sup> As businesses plan and make  
6   future investment decisions, they will certainly look to locate in regions that support and  
7   maintain their progress. Thus, a balanced portfolio of energy resources, including dispatchable  
8   resources and access to clean energy resources, is critical to making the Ameren Missouri service  
9   territory an attractive location for new business investment.

10           **Q.     Is Ameren Missouri supporting the state of Missouri and community-based**  
11 **economic development objectives?**

12           A.     Yes. Economic development is often referred to as a “team sport,” meaning that  
13   success in this discipline is always the result of many parties working together. Generally, this  
14   team includes state of Missouri elected and agency officials, DED, the Missouri Partnership, and  
15   local governments, local chambers of commerce, port authorities, workforce development  
16   agencies, community and technical colleges, and various utilities.<sup>10</sup>

17           As a result of the interdependence of these organizations, an economic development  
18   “win” for Missouri results in a win for the local region in which that business locates. It is a win  
19   for the utilities in that area, and it is certainly a win for Missouri citizens who benefit from

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<sup>8</sup> Carbon-free energy - Amazon Sustainability. Amazon will require additional access to clean energy to maintain their having met their goal as their loads grow over time.

<sup>9</sup> Aiming to Achieve Net-Zero Emissions - Google Sustainability

<sup>10</sup> The Missouri Partnership is a public-private economic development organization that works closely with the Missouri Department of Economic Development, the State, and others (including utility economic development organizations) to attract investment and resulting jobs, tax revenues, and economic activity to Missouri.

1 increased economic growth opportunities. Additional details on the impact of these projects are  
2 discussed below.

3 Since these organizations win (or lose) as a team, our economic development strategies  
4 must be in sync with each other. Ameren Missouri directly supports the state of Missouri's  
5 economic development strategy, along with those of our local community partners within our  
6 service territory. In fact, the Missouri Partnership prominently features low energy costs and the  
7 availability of utilities as reasons that make Missouri an attractive location for business  
8 investment.<sup>11</sup> Similarly, communities as different from each other as St. Louis Metro, Jefferson  
9 City, Kirksville, and Cape Girardeau all rely on strong partnerships with Ameren Missouri to  
10 help them attract and expand manufacturers, data centers, and other businesses. Ameren  
11 Missouri works alongside these organizations every day to help win new jobs and investment.

12 The state of Missouri has existing incentives and other supportive public policies that are  
13 in place to help attract and expand large businesses to our state. These programs have been  
14 supported by different Governors and General Assemblies, and they have been a part of the  
15 state's economic development "tool kit" for years. For example, in 2017, Missouri passed the  
16 Data Center Sales Tax Exemption Program to attract and expand data centers, reflecting  
17 Missouri's recognition of the importance of attracting data centers to the state.<sup>12</sup> The Missouri  
18 Works Program provides incentives for job creation and capital investment, and is often used for  
19 manufacturing projects, among others.<sup>13</sup> There are many other state and local programs that are  
20 designed to attract and expand large businesses to Missouri. The longstanding policy of the state

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<sup>11</sup> [Missouri Partnership | Economic Development | Prime Business Location](#)

<sup>12</sup> [Data Center Sales Tax Exemption Program | Department of Economic Development](#)

<sup>13</sup> [Missouri Works | Department of Economic Development](#)

1 of Missouri is to support economic development, and Ameren Missouri works every day to  
2 support this priority.

3 In economic development, states and communities must continue to update and evolve  
4 their economic development strategies amid changes in the broader economy. From time to time,  
5 Missouri has modified, eliminated, or created new economic development programs to stay  
6 relevant and competitive. Nothing is static in economic development, and certainly, as will be  
7 discussed below, we are experiencing some of the most dynamic changes in businesses' electric  
8 demands we have ever faced. Because of this change, we must also adapt our energy policies and  
9 utility tariffs so that we can continue supporting Missouri's economic development goals. The  
10 proposed Large Load Rate Plan creates a mechanism by which Ameren Missouri can continue to  
11 responsibly support the state's economic development objectives in today's economy.

### 12 III. RECENT TRENDS IN LARGE LOAD ECONOMIC DEVELOPMENT

13 **Q. Is Missouri experiencing an increase in electric demand from economic**  
14 **development prospects?**

15 **A.** Yes. Like most areas of the country, Missouri is experiencing a significant  
16 increase in requested electric demand from economic development prospects that are inquiring  
17 about locating a new facility or expanding an existing one here. More than ever before, our  
18 state's opportunity to win these economic development projects hinges on our ability to reliably  
19 and affordably provide these customers with electric service and to assist them in meeting their  
20 clean energy goals.

21 Last year, the Missouri Department of Economic Development shared project data at  
22 several Missouri Public Service Commission meetings and summits, and these projects have



massive power demands. As can be seen in Figure 2 below, there are multiple individual requests for more than 1,000 megawatts, including for manufacturing and data center prospects.

**Figure 2: Missouri Department of Economic Development & Missouri Partnership Selected Projects on August 13, 2024**

Jobs	Capex	Site Acreage Requirement	Building Square Footage Requirement	Electric Requirements
1,500	\$5,200,000,000	820		480 MW 100% Renewable
650	\$3,300,000,000	2,200		1.28 GW
675	\$2,000,000,000	260		1 GW 100% Renewable
3,240	\$1,500,000,000	200		80 MW
388	\$550,000,000	300	1,500,000	12 MW
802	\$199,000,000		760,000	15 MW
		150		200 MW
150	\$800,000,000	175		500 MW
205	\$599,000,000	30	450,000	50 MW
100	\$320,000,000	650		45 MW
200	\$140,000,000	50	526,262	9.5 MW portion attributed to renewables
308	\$121,000,000	50	275,000	12 MW
5,000	TBD	1,000		1.2 GW by 2042
1,000	\$1,000,000,000	150		400 MW by 2028
326	\$455,000,000	80		100 MW

Source: Missouri Public Service Commission<sup>14</sup>

Within the Ameren Missouri service territory, we are also experiencing the same type of inquiries for large electric loads that is happening across the state and country. As is shown in Figure 3 below, currently, the Ameren Missouri economic development team is managing a portfolio of 98 prospective economic development projects (including some of the projects noted within the DED table above), with a total electric demand of over 30,000 megawatts. Traditionally, the state wins about 10 – 15% of new business attraction opportunities, which would have a massive positive impact on the state.

<sup>14</sup> [DED Update](#).

**Figure 3: Ameren Missouri Economic Development Pipeline as of 5/9/25.  
New & Existing Businesses Inquiring about  
Expansions in Ameren Missouri Service Territory<sup>15</sup>**

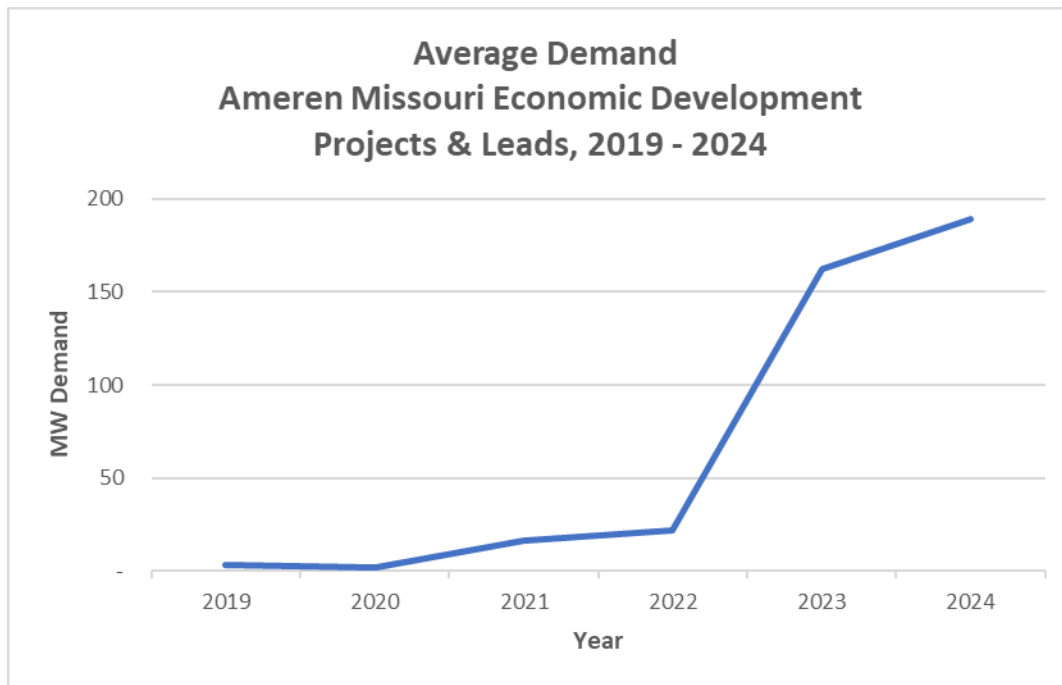
Industry	Project Count	Expected Demand (MW)
Manufacturing	40	12,691
Data Center	37	17,401
Rock quarries/ Asphalt plants	3	39
Other	19	623
<b>Total Potential</b>	<b>99</b>	<b>30,754 MW</b>

The average electric demand for an individual economic development prospect has dramatically increased in a short period of time, which further demonstrates the need for constructive energy policies that support economic development, including the proposed Large Load Rate Plan in these proceedings. As is illustrated below in Figure 4, the average electric load requested by an economic development prospect that was considering a location in Ameren Missouri's service area was just above 3 MW in 2019. As of the end of 2024, that jumped to nearly 190 MW, as shown in Figure 4 below.

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<sup>15</sup> Figures are approximations based upon information provided by those developing the potential new or expanded loads.

**Figure 4: Average Demand in Megawatts Requested by Economic Development Projects & Leads in Ameren Missouri Service Territory, 2019 – 2024.**



**Q. What is the general process that a large economic development prospect must follow to establish operations in Ameren Missouri’s service territory, from an electric service perspective?**

**A.** When a prospective customer with a load of 50 MW or more who will take service at a voltage above our standard primary service voltage expresses interest in locating in our service area, the first step is to evaluate the potential impact on the transmission or distribution system at their desired location. Ameren engineering teams conduct detailed studies on the system impact, and then we establish timelines and cost estimates for the customer to interconnect. These details are provided in an interconnection study report.

1           Should these customers wish to proceed with their project, we will execute a construction  
2     agreement with them. The construction agreement memorializes the costs and timelines to  
3     extend service to their site. By executing construction agreements, the customer makes  
4     significant financial commitments to reimburse Ameren Missouri for the costs of building the  
5     infrastructure required to extend electric service to these locations. Primarily, that includes  
6     interconnection to the transmission system, line extensions, substations, transformation, switch  
7     gears, breakers and other infrastructure, not including generation resources.

8           Under the terms of the Large Load Rate Plan filed in this docket, the final step in the  
9     construction process for such customers will be for the customer to execute an Electric Service  
10    Agreement ("ESA"), the form of which is included in the filing.

11           **Q.     Are there real economic development projects that are considering Missouri,**  
12    **or is this just a lot of speculation?**

13           A.     While the state will not win every prospect in the economic development pipeline,  
14     we are working to secure firm commitments from customers that will make significant capital  
15     investments in Missouri and create many jobs here. Ameren Missouri has executed five  
16     construction agreements with entities that are actively developing sites for large economic  
17     development projects with a total electric demand of up to 2,270 MW that would be served under  
18     the proposed Large Load Rate Plan. The expected electric load ramp-up schedule for these  
19     projects is consistent with the timelines and scenarios in the Company's recently filed 2025  
20     Preferred Resource Plan. This new electric load has been planned for and is discussed in Matt  
21     Michels' Direct Testimony in greater detail.

22           These construction agreements are a critical step in the process to bring these economic  
23     development opportunities to Missouri, as they establish the timelines, transmission system

1 capacities, and costs to the customer to locate a power-intensive facility at these sites,  
2 accompanied by payments from these customers to reimburse Ameren Missouri for the costs to  
3 extend service to these sites. Construction agreements, though, are not the final commitment to  
4 have an end-use customer operating a business at these locations. Should the Commission  
5 approve the filing in this docket, Ameren Missouri will be able to implement ESAs with these  
6 customers that would govern the provision of electric service to the customers at these sites.

7 While we are awaiting the Commission's order, however, we are doing everything within  
8 our capabilities to ensure that Missouri does not miss out on the significant positive economic  
9 development opportunities that are seeking to establish operations here right now. To that end,  
10 we have been negotiating with prospective new customers on the terms of an ESAs should the  
11 Commission approve the Large Load Rate Plan. While there are other site selection factors these  
12 prospective customers are still evaluating, we are confident that upon approval of these  
13 proceedings, Ameren Missouri will be able to address their electric service needs.

#### 14 IV. BENEFITS OF LARGE LOAD ECONOMIC DEVELOPMENT

15 **Q. What are the expected economic benefits to Missouri and its communities of**  
16 **large load customer projects?**

17 A. The overarching reason to pursue economic development is because of the  
18 positive benefits it brings to the citizens of the state and its communities. When an area  
19 experiences economic growth, new jobs provide opportunities for employment, helping to attract  
20 and retain the area's population and improve its tax base. Capital investment by businesses  
21 brings additional revenues to state and local governments. Additional businesses are attracted or  
22 started, and the overall quality of life is improved.

1 Recently, Ameren Missouri conducted an economic impact analysis of two potential data  
2 center projects. We wanted to understand the impact to the broader economy if a data center  
3 located at some of the sites that are currently under a construction agreement with Ameren  
4 Missouri. The results of this study indicate significant potential benefits to Missouri, its  
5 communities, and its citizens. The following information is based on two hypothetical (but  
6 possible) economic development projects. As such, it is subject to revision with the actual capital  
7 investment amounts and job creation plans once an end-use customer selects these locations and  
8 establishes actual project plans. Additionally, it does not account for possible state and local tax  
9 incentives. Regardless, these results suggest there is a strong economic benefit to bringing  
10 additional large load customers to Missouri and certainly more benefit to Missourians than if  
11 these businesses located in another state.

12 In the first case, we examined the impact of a large data center located at one of the sites  
13 in our service territory for which we have an executed construction agreement and concluded the  
14 total estimated economic impact could be over \$10 billion. State and local jurisdictions could see  
15 over \$125 million in sales and use tax revenues from construction and equipment purchases and  
16 over \$1.5 billion in total property tax revenue over the next 20 years.<sup>16</sup>

17 In the second case, we examined the economic impact of another large data center at  
18 another site in our service territory for which we have an executed construction agreement. The  
19 total estimated economic impact could be approximately \$2 billion. State and local jurisdictions  
20 could see \$20 million in sales and use tax revenues from construction and equipment purchases  
21 and over \$210 million in total property tax revenue over the next 20 years.<sup>17</sup>

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<sup>16</sup> Ameren Missouri Economic Impact Report: Data Center Project 1.

<sup>17</sup> Ameren Missouri Economic Impact Report: Data Center Project 2.

1 In addition to these positive economic development benefits noted above, we would also  
2 expect to see hundreds of permanent jobs and thousands of construction and other skilled trades  
3 jobs depending on the size and scale of the final project.<sup>18</sup> It is important to note that economic  
4 development projects involving large power users may take several years to fully construct.  
5 Given the sophistication of their equipment and frequent ongoing refurbishment of their  
6 facilities, the demand for construction and trades jobs needed to build and maintain these  
7 campuses can last for years, in addition to the jobs permanently located there.

8 **Q. Are there other reasons to support large data centers and economic**  
9 **development projects?**

10 A. Yes. Data centers are increasingly considered infrastructure that is critical to U.S  
11 national security and economic interests. Recently, President Donald J. Trump issued an  
12 executive order to “sustain and enhance America’s dominance in [artificial intelligence] to  
13 promote human flourishing, economic competitiveness, and national security.”<sup>19</sup> Additionally,  
14 President Trump declared a national energy emergency. Among other objectives, this declaration  
15 prioritizes the development of new generation resources to supply the growing demand from  
16 manufacturers and data centers in order to support national security and economic interests.<sup>20</sup>  
17 The previous administration also supported the building of data centers and AI infrastructure on  
18 national security and economic grounds.

19 Missouri has a long history of economic development that supports broader U.S. national  
20 security and economic interests, and the current interest from large data centers and

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<sup>18</sup> Ameren Missouri Economic Impact Report Data Center Project 1 & 2., [Meta selects Entergy, Northeast Louisiana as site of \\$10B data center](#); <https://rgp.org/regional-growth-partnership-and-jobs/ohio-welcome-meta-to-northwest-ohio-with-new-800-million-data-center-announcement/>; [Google Announces \\$1B Data Center in Kansas City](#); [Google breaks ground on Dorchester County data centers totaling \\$2B - Charleston Business](#)

<sup>19</sup> [Fact Sheet: President Donald J. Trump Takes Action to Enhance America’s AI Leadership – The White House](#)

<sup>20</sup> [Declaring a National Energy Emergency – The White House](#)

1 manufacturers is an important enhancement of our state's economy. Defense, aerospace,  
2 geospatial, and other sectors have continued to expand and grow in Missouri, including the  
3 recent contract award by the U.S. Department of Defense to Boeing to manufacture the next  
4 generation U.S. Air Force fighter jet. This was supported by a \$1.8 billion expansion and the  
5 16,000 employees at Boeing's facilities in St. Louis County.<sup>21</sup> Continuing to attract new and  
6 existing large manufacturers and data centers aligns Missouri's economic development  
7 opportunities with U.S. national and economic interests.

8 **Q. What role does the Large Load Rate Plan proposed in this docket play with**  
9 **respect to Ameren Missouri's ability to attract and serve these customers?**

10 A. Approval of the Large Load Rate Plan is vital to attracting economic development  
11 to Missouri. The Company's request in this docket will establish the framework by which we can  
12 execute firm commitments with large customers to locate in Missouri and ultimately bring  
13 economic development benefits to our state. As has been discussed above, economic  
14 development prospects desire large amounts of electric energy, and they want it to be clean,  
15 reliable, and affordable. Through the modifications to the 11M tariff, creation of the Electric  
16 Service Agreement, and the various clean energy program tariffs that are included in this filing,  
17 Ameren Missouri addresses this top site selection factor in a prudent way that ensures the large  
18 power users are not negatively impacting other customers.

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<sup>21</sup> [Boeing Wins Next Generation Air Dominance Program, Selected to Build New F-47 Fighter Jet | Greater St. Louis, Inc.](#)



**V. CONCLUSION**

**Q. What action do you recommend the Commission should take in these proceedings?**

A. The Commission should approve Ameren Missouri's proposed Large Load Rate Plan. Throughout my testimony, I have demonstrated the economic development opportunities that could come to Missouri if we have this tariff structure that allows us to successfully attract large businesses. Through the significant efforts of our state and local economic development partners alongside Ameren Missouri, we are confident that prompt approval of our request is needed to bring these investments to Missouri. Other Ameren Missouri witnesses and I have explained how we propose to serve these new customers, while remaining competitive and mitigating the impact to existing customers and to the integrity of the electric grid.

**Q. Does this conclude your direct testimony?**

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 Approval of New or Modified Tariffs     )  
for Service to Large Load Customers.     )

File No. ET-2025-0184

**AFFIDAVIT OF ROBERT B. DIXON**

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

Robert B. Dixon, being first duly sworn states:

My name is Robert B. Dixon and on my oath declare that I am of sound mind and lawful age; that I have prepared the foregoing *Direct 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

Sworn to me this 14<sup>th</sup> day of May, 2025.