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 Permission and Approval and Certificates of Public Convenience and Necessity Authorizing it to Construct a New Generation Facility and Battery Energy Storage System Facility.	))))))	File No. EA-2025-0238

APPLICATION

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Company," "Ameren Missouri," or "Applicant"), pursuant to Sections 393.170.1, RSMo,[1] 20 CFR 4240-2.060, and 20 CSR 4240-20.045, and hereby submits to the Missouri Public Service Commission ("Commission") its Application, requesting the following:

- A Certificate of Convenience and Necessity ("CCN") under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain and otherwise control and manage an electric generating facility to be constructed in Jefferson County, Missouri ("Big Hollow CTG Project" or "CTG Project");
- A CCN under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage a 400-megawatt ("MW") battery energy storage system facility to be constructed in Jefferson County, Missouri ("Big Hollow BESS Project" or "BESS Project") (together with the CTG Project, "the Projects");
- A variance from the requirement in 20 CSR 4240-20.045(6)(J) allowing the Company to submit an overview of its plans for restoration of safe and adequate service after significant,

[1] All statutory references are to the Revised Statutes of Missouri (2016), unless otherwise stated.

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unplanned/forced outages sixty (60) days after the time when each Project is placed in-service;

- Issuance of a Commission order granting the relief requested in this Application by March, 2026, so that the Projects can be timely constructed and placed in-service; and
- For such other and further relief as may be appropriate.

In support of these requests, Applicant 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. The Applicant is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. There is already on file with the Commission a certified copy of Applicant's Articles of Incorporation (See Case No. EA-87-105), which is incorporated herein by reference. The Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office is attached hereto as *Application Schedule A*. A Certificate of Corporate Good Standing for Applicant is attached as *Application Schedule B*.

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

Steven Wills
Senior 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. The Applicant has no overdue annual report or assessment fees.

5. A 60-day notice with respect to the authority sought herein was filed on March 3, 2025, and assigned the above-captioned file number.

II. REQUEST FOR CCN FOR THE BIG HOLLOW CTG PROJECT UNDER SECTION 393.170.1

6. Applicant requests a CCN for the Big Hollow CTG Project.

A. Project Description

7. The Big Hollow CTG Project is an approximately 800-megawatt ("MW") multi-unit simple cycle natural gas electric generation facility with fuel oil backup capability to be constructed in Jefferson County, Missouri, at the former site of Ameren Missouri's coal-fired Rush Island Energy Center. The property is presently owned by Ameren Missouri and will be interconnected to Ameren Missouri's 345-kV transmission system located at the proposed Project site. The Project will include four General Electric (GE) Frame 7FA.04 combustion turbine generator ("CTG") units in a dual fuel configuration. Each unit will have a net summer capability of approximately 170 MW during hot, summer conditions while firing natural gas and approximately 200 MW on cold, winter days on fuel oil back-up. In addition, the CTG Project will include construction of two fuel oil storage tanks that will provide a 72-hour supply of backup fuel oil, a demineralized water storage tank, four natural gas compressors, and other necessary equipment. The units will be equipped with selective catalytic reduction units to comply with air permitting requirements at the site, which is in a non-attainment area under applicable air quality regulations.

8. In developing and constructing the CTG Project, Ameren Missouri will utilize direct purchases by the Company and an engineering, procurement, and construction ("EPC") contract. Specifically, Ameren Missouri will utilize competitive bidding to purchase the major equipment and has used a negotiated approach for acquisition of the engines, as discussed in Company witness Chris Stumpf's Direct Testimony. The EPC contract will be competitively bid, including both local and national contractors. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials.

9. Construction is anticipated to commence during the second quarter of 2026 and is anticipated to be completed and placed in-service by September 1, 2028.

B. The Big Hollow CTG Project is Necessary or Convenient for the Public Service ("*Tartan* Factors")

10. The Commission traditionally analyzes an application for a CCN using the following factors:

a. Need for the Project;

b. Economic Feasibility of the Project;

c. Ability of the Applicant to Finance the Project;

d. Qualifications of the Applicant to Construct the Project; and

e. Whether the Project is in the Public Interest. [2]

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.[3]

[2] 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).

[3] *Id*. at 189 (*citing In re: Intercon Gas, Inc*., 30 Mo. P.S.C. at 561).

1. There is a need for the Big Hollow CTG Project.

11. The Big Hollow CTG Project is needed for several reasons. First, as outlined in the Company's 2025 Preferred Resource Plan and as discussed by Company witness Michels' and Arora's Direct Testimony, the Company needs additional capacity to serve new large load customers, including at least 500 MW of new load that is highly likely to come onto the system in the near-term, and potentially 1.5 gigawatts ("GW") to 2 GW or more over just the next few years. Given the Company's obligation to serve and the significant new loads requesting service from the Company, the Big Hollow CTG Project is needed to serve that load and, at a minimum, to put in place a hedge against the risk that the loads materialize, leaving the Company short of the capacity it needs to serve reliably and economically without undue reliance on the market.

12. Moreover, there are other benefits of adding the Big Hollow CTG Project that also support the conclusion that it is necessary or convenient for the public service. Aside from serving expected new loads, the Project will assist the Company in meeting the letter and spirit of the replacement generation requirements in Senate Bill No. 4 ("SB No. 4"),[4] adopted this year by the Missouri General Assembly, as addressed by Company witness Michels' Direct Testimony. As Mr. Michels' Direct Testimony also discusses, adding Big Hollow provides important flexibility if certain events occur, even if there are not significant new loads. This flexibility includes having valuable and needed capacity on the Ameren Missouri system if planned combined cycle generation that is planned to replace the aging Sioux Energy Center coal facility, which is slated to go into service by January 1, 2032, is delayed (which could certainly occur, given both equipment and labor supply chain concerns, among other reasons). The CTG Project also provides flexibility if an event occurred prior to 2032 that forces an early retirement of Sioux, or in the event

[4] Section 393.401, RSMo. (to become effective August 28, 2025).

environmental regulations require an earlier-than-expected retirement of one or more Labadie units or otherwise impact Labadie's generation.

Other benefits of the CTG Project include that it enables to the Company to take advantage of the valuable, existing interconnection rights at the former Rush Island coal plant site without the need to contend with the long and potentially expensive MISO Large Generator Interconnection Queue, it contributes to meeting the Local Clearing Requirement in Zone 5 (Missouri), and it will contribute to relieving customer exposure to some of the tightness seen in the capacity situation in MISO, as evidenced in recent years and again just a few weeks ago when the 2025-2026 MISO Planning Resource Auction cleared at a capacity price that is nearing the cost of new entry (see Company witness Meyer's Direct Testimony).

13. In sum, the proposed Big Hollow CTG Project is an improvement that justifies its costs.[5]

2. The Big Hollow CTG Project is economically feasible.

14. The Big Hollow CTG Project is economically feasible. As explained in the Direct Testimonies of Steven Wills, Ajay Arora, Andrew Meyer, and Matt Michels and as outlined above, the Big Hollow CTG Project meets several needs and is an improvement justifying its cost. For several reasons, the CTG Project is also economically feasible, based on various indicia of economic feasibility identified by the Commission in prior generation CCN cases, including,

- The Big Hollow CTG Project meets the identified needs in a cost-effective manner, given that CTGs are recognized (a recognition borne out by the Company's IRP) as the capacity resource with the lowest capacity cost.

[5] *Id.*

- As the Commission has recognized, since the CTG Project is needed, economic feasibility generally turns on the Company's ability to finance the Projects, which it has, as addressed below.
- The CTG Project is part of the Company's 2025 Preferred Resource Plan, which is demonstrated to meet the Company's needs at a lower net present value of revenue requirement ("NPVRR") than alternatives to doing so.
- As described earlier, much of the CTG Project's equipment and construction are occurring as part of a competitive bidding process to ensure that its development and implementation occur at market-based pricing.
- By pursuing the existing valuable interconnection rights at the Rush Island site, the CTG Project is not subject to costly interconnection upgrades and schedule delays that otherwise would likely exist due to MISO's time-intensive interconnection process.
- By utilizing property that the Company currently owns, acquisition costs for the real property necessary for the Project are avoided.
- The Project will create jobs and tax revenues within the state and within the Company's service territory, which contributes to the Project's economic feasibility.

3. Ameren Missouri is able to finance the Big Hollow CTG Project.

15. As explained in the Direct Testimony of Company witness Darryl Sagel, Ameren Missouri has the financial capability to generate and raise the capital needed to develop the Project. Specifically, the upfront capital cost of the Big Hollow CTG is expected to be approximately

*** _____ ***.[6] The Company's existing rate base – financed by an appropriate balance of debt and equity – exceeds $13 billion, and its planned capital additions over the coming five years (including the projects at issue in this Application) also exceed $16 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. Ameren Missouri is able to finance the Big Hollow CTG Project.

4. Ameren Missouri is qualified to construct the Big Hollow CTG Project.

16. As explained in the Direct Testimony of Chris Stumpf, Ameren Missouri is qualified to construct the CTG Project and to operate it, given the financial, technical, and management expertise Ameren Missouri has developed over the course of its long history as a large public utility operating in the state of Missouri. More specifically, Ameren Missouri has constructed, owns, and operates 43 different CTGs located at 12 different facilities, with a total summer net capability of more than 2,700 megawatts.[7] and winter net capability of more than 3,300 MW.

5. The Big Hollow CTG Project is in the public interest.

17. As discussed in Company witness Steven Wills' Direct Testimony, implementation of the Big Hollow CTG Project promotes the public interest because in addition to the fact that it meets the first four *Tartan* factors, the Project promotes the public interest for other reasons, including because it allows the Company to effectively balance the three priorities that should be considered the pillars of the generation transition that the Company is undertaking and which is otherwise happening broadly across our industry: reliability, affordability, and sustainability.

[6] This includes the Allowance for Funds Used During Construction (AFUDC). See Company witness Stumpf's Direct Testimony for a discussion of these estimates.
[7] 2023 Ameren Missouri IRP, Ch. 4.

C. Other Filing Requirements

18. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following:

a. the CTG Project site, located at the former Rush Island Energy Center site in Jefferson County, Missouri, is depicted in and described in detail in Schedule C to this Application (20 CSR 4240-20.045(6)(A));

b. there are no items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the CTG Project site;

c. in accordance with 20 CSR 4240-20.045(6)(C),

(i) the scope of the construction Project is described in Company witness Stumpf's Direct Testimony;

(ii) existing Project specifications and existing drawings for the CTG Project can be found in Schedule CS-D2 of Company witness Stumpf's Direct Testimony;

(iii) the CTG Project is estimated to cost approximately ***_____ _____***;

(iv) the operational features of the asset once it is fully operational and used for service are discussed by Company witness Stumpf in his Direct Testimony;

d. the projected beginning of construction is expected in the second quarter of 2026 after the required permits are received, and the CTG Project is expected to be placed in-service by September 1, 2028 (20 CSR 4240-20.045(6)(D));

e. the only common plant that will be included in the CTG Project will be the water supply that it will share with the BESS Project, which is also to be constructed at the former Rush Island Energy Center site (20 CSR 4240-20.045(6)(E));

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f. Ameren Missouri's plans for financing the CTG Project are discussed in the Direct Testimony of Company witness Sagel (20 CSR 4240-20.045(6)(F));

g. the CTG Project is contemplated by the Company's new Preferred Resource Plan as explained in the Direct Testimony of Company witness Michels (20 CSR 4240-20.045(6)(G));

h. as explained in the Direct Testimony of Company witness Stumpf,

(i) the CTG Project engines were procured based on a negotiated agreement with GE for the reasons outlined in witness Stumpf's testimony;

(ii) Dilution air SCRs, power distribution centers, natural gas compressors, continuous emission monitors, and 18 kV circuit breakers will all be competitively bid; and

(iii) the detailed design, construction, and remainder of the balance of plant equipment will be competitively bid with an EPC contract delivery method (20 CSR 4240-20.045(6)(I)).

i. as described in the Direct Testimony of Company witness Stumpf, the CTG Project will be operated and maintained by Ameren Missouri, with the operation of the facility managed by the Ameren Missouri CTG Operations group in a similar manner as the Company's other CTG plants (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages sixty (90) days after the Big Hollow CTG Project is placed in-service; and

k. there is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the CTG Project does not include construction of new transmission lines or transmission substations outside of property owned by Ameren Missouri.

19. As required by ¶ 5(o) of the Stipulation and Agreement entered and approved in File No. EA-2023-0286, Ameren Missouri:

a. through witness Michels' Direct Testimony, is providing the information required by subsections i and ii;

b. through the Direct Testimonies of Arora, Wills, Michels, and Meyer, is providing testimony regarding what needs the Project addresses, whether qualitative or quantitative, as well as the timing of those needs, as required by subsection iii;

c. through the Direct Testimony of Steve Wills, there are no regulatory treatments implicated by this filing, as required by subsection iv.; and

d. as described in this Application with reference to the Direct Testimonies of Ameren Missouri witnesses, testimony addressing questions 1-10, as required by subsection v.

III. REQUEST FOR CCN FOR THE BIG HOLLOW BESS PROJECT UNDER SECTION 393.170.1

20. Applicant requests a CCN for the Big Hollow BESS Project.

A. Project Description

21. The BESS Project is a 400 MW_{AC} battery energy storage system facility to be constructed in Jefferson County, Missouri, at the former site of Ameren Missouri's coal-fired Rush Island Energy Center. The property is presently owned by Ameren Missouri and will be

interconnected to Ameren Missouri's 345-kV transmission system located at the proposed BESS Project site.

22. Ameren Missouri will construct, install, own, operate, and maintain the BESS Project, which will improve system reliability, support renewable energy integration, reduce reliance on fossil fuels, and enhance overall grid stability and flexibility.

23. As explained in the direct testimony of Ameren Missouri witness Wibbenmeyer, the BESS Project will include consist of approximately 408 battery containers and two step-up transformers with a capacity of 400 MW built to Ameren Missouri specifications for an asset life of 15 years, based upon current forecasts for available equipment. The BESS Project is expected to be placed in service by April 1, 2028, a few months prior to the date it needs to go into service to take advantage of the existing valuable interconnection rights at the Rush Island site and avoid delays and costs associated with having to complete the MISO Large Generator Interconnection queue.

24. As explained in the Direct Testimony of Company witness Scott Wibbenmeyer, Ameren Missouri will utilize a competitive bidding process to select the EPC contractor and related equipment suppliers for the BESS Project. The EPC contract will be competitively bid, including both local and national contractors. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials. Ameren Missouri will be responsible for the BESS Project's interconnection to its existing 345-kV transmission system currently at the Rush Island site.

25. Construction is anticipated to commence in the 2nd quarter of 2026, and as noted above the entire facility is slated to be in service by April 1, 2028.

B. The BESS Project is Necessary or Convenient for the Public Service ("*Tartan* Factors")

26. As previously stated in this Application, the Commission traditionally analyzes an application for a CCN using the following factors:

a. Need for the Project;

b. Economic Feasibility of the Project;

c. Ability of the Applicant to Finance the Project;

d. Qualifications of the Applicant to Construct the Project; and

e. Whether the Project is in the Public Interest.

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.

1. There is a need for the BESS Project.

27. The BESS Project is needed for several reasons. The BESS Project is expected to provide 400 MW_{AC} of year-round available capacity and energy to meet Ameren Missouri customers' needs. As addressed in the testimony of Company witness Matt Michels, the BESS Project is called for by the Company's 2025 Preferred Resource Plan submitted in File No. EO-2025-0235 as part of the addition of dispatchable resources, as is the case with the CTG Project which is also the subject of this case.

28. More specifically, the 400 MW_{AC} of battery energy storage that the Company seeks authorization for in this filing represents 40% of the 1,000 MW of battery energy storage proposed to be installed by 2030, as outlined in the Company's 2025 Preferred Resource Plan. As described in Company witness Michels' Direct Testimony, this BESS Project supports the Company's overall supply-side plan (as set out in File No. EO-2025-0235), which relies on a least-cost mix of low- and zero-carbon generation resources to replace the energy being lost as

aging, coal-fired generation resources retire, as well as mitigating the myriad risks associated with its reliance on aging fossil-fueled generation, while adding appropriate dispatchable resources like the BESS assets and the Big Hollow CTG units--as described more specifically in the Direct Testimonies of Company witnesses Arora, Michels, Meyer, and Wills, filed in this docket.

29. Moreover, the other benefits discussed in paragraph 12 above regarding the Big Hollow CTG Project also exist with respect to the Big Hollow BESS Project

30. In sum, the proposed BESS Project is an improvement that justifies its costs.

2. The BESS Project is economically feasible.

31. The BESS Project is economically feasible. As outlined in greater detail in Company witnesses Arora, Wills, and Michels Direct Testimonies, the BESS Project is economically feasible based on various indicia of economic feasibility identified by the Commission in prior CCN cases, including,

- The BESS Project meets the identified needs in a cost-effective manner given that battery storage generation provides dispatchable, flexible generation in a cost-effective manner up to capacities well in excess of the 400 MW of BESS or which approval is sought in this case, as discussed in Company witness Michels' Direct Testimony.
- As the Commission has recognized, since the BESS Project is needed, economic feasibility generally turns on the Company's ability to finance the Projects, which it has, as addressed below.

- The BESS Project is part of the Company's 2025 Preferred Resource Plan, which is demonstrated to meet the Company's needs at a lower NPVRR than alternatives to doing so.
- By taking advantage of the existing valuable interconnection rights at the Rush Island site, the BESS Project is not subject to costly interconnection upgrades and schedule delays that otherwise would likely exist due to MISO's time-intensive interconnection process.
- By utilizing property that the Company currently owns, acquisition costs for the real property necessary for the Project are avoided.
- The BESS Project will create jobs and tax revenues within the state and within the Company's service territory, which contributes to the Project's economic feasibility.

32. Further, Ameren Missouri expects that the BESS Project will be eligible for the 30% investment tax credit ("ITC") provided in the Inflation Reduction Act of 2022.[8] The BESS Project is also expected to qualify for an additional 10% energy community tax credit bonus since it directly adjoins a census tract with a qualifying coal-fired electric generating unit retirement and is also expected to qualify for the additional 10% domestic content bonus. These tax credit incentives can be stacked with the 30% ITC, resulting in a total potential 50% ITC.

3. Ameren Missouri has the ability to finance the BESS Project.

33. As explained in the Direct Testimony of Company witness Sagel, Ameren Missouri has the financial capability to generate and raise the capital needed to develop the BESS Project. Specifically, the upfront capital cost of the BESS facility is expected to be approximately ***___

[8] This is consistent with Paragraph 5.j. of the Unanimous Stipulation and Agreement in File No. EA-2024-0237, which requires that Ameren Missouri, in a CCN application seeking permission to build 200 MW of BESS at a former coal plant site (or part of the BESS capacity at one site and part at another), seek both the storage ITC and the Energy Community tax credit adder to help finance the project.

*****.** Ameren Missouri expects to finance the BESS Project through a mix of long-term debt and equity in line with current capitalization ratios utilized in developing revenue requirements for ratemaking purposes. The Company will file an appropriate application for approval of any such debt required. Additionally, The Company's existing rate base – financed by an appropriate balance of debt and equity – exceeds $13 billion, and its planned capital additions over the coming five years also exceed $16 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. Ameren Missouri is able to finance the BESS Project.

4. Ameren Missouri is qualified to construct the BESS Project.

34. As explained in the Direct Testimony of Company witness Wibbenmeyer, Ameren Missouri is qualified to construct the BESS Project and to operate it, given the financial, technical, and management expertise Ameren Missouri has developed over the course of its long history as a large public utility operating in the state of Missouri. Ameren Missouri has been in business for over 100 years and has been granted CCNs by the Commission for many projects in the past. More specifically, Ameren Missouri has constructed, owns, and operates a diverse portfolio of energy projects, including gas, hydro, wind, and solar resources. This extensive experience has provided Ameren Missouri with a deep understanding of the technical and operational requirements of energy infrastructure projects. The knowledge and skills developed through our existing projects translate seamlessly to BESS development, construction and operation, which includes project management expertise, contract management and negotiation, engineering and design, and operations and maintenance. The Company has a proven track record of incorporating innovative

solutions, such as deploying renewable energy projects, and is well positioned to embrace battery technology.

5. The BESS Project is in the public interest.

35. As discussed in Company witness Wills' Direct Testimony, implementation of the BESS Project promotes the public interest because in addition to the fact that it meets the first four *Tartan* factors, the BESS Project promotes the public interest for other reasons, including because it enhances the reliability, affordability, and sustainability of Ameren Missouri's generation system for the benefit of its customers.

C. Other Filing Requirements

36. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following:

a. the BESS Project site, located at the former Rush Island Energy Center site in Jefferson County, Missouri, is depicted in and described in detail in Schedule C to this Application (20 CSR 4240-20.045(6)(A));

b. there are no items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the BESS Project site;

c. in accordance with 20 CSR 4240-20.045(6)(C),

(i) the scope of the construction for the BESS Project is described in Company Witness Wibbenmeyer's Direct Testimony;

(ii) existing specifications and existing drawings for the BESS Project can be found in Schedule SW-D2 of Company witness Wibbenmeyer's Direct Testimony;

(iii) the BESS Project is estimated to cost approximately ***_____ _____***;

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(iv) the operational features of the asset once it is fully operational and used for service are discussed by Company witness Wibbenmeyer in his Direct Testimony;

d. the projected beginning of construction is expected to commence in the 2nd quarter of 2026 after the required permits are received, with the entire project expected to be in service by April 1, 2028 (20 CSR 4240-20.045(6)(D));

e. The water system will be treated as common plant with the CTG Project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing the BESS Project are discussed in the Direct Testimony of Company witness Sagel (20 CSR 4240-20.045(6)(F));[9]

g. the BESS Project is contemplated by the Company's 2025 Preferred Resource Plan as explained in the Direct Testimony of Company witness Michels (20 CSR 4240-20.045(6)(G));

h. as explained in the Direct Testimony of Company witness Wibbenmeyer, Ameren Missouri will utilize direct purchases by the Company and an EPC contract.[10] The EPC contract will be competitively bid, including both local and national contractors. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials (20 CSR 4240-20.045(6)(I));

i. the BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation is operated. More specifically, the

[9] As additional plans and specifications are developed, the Company will submit them in this docket via EFIS.
[10] The Company will continue to evaluate whether to include the battery equipment in the EPC's scope and if more economical, could decide to procure the equipment itself.

BESS Project will be operated by Ameren Missouri, with the operation of the facility managed by Ameren Missouri Energy Management & Trading group, similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with the Mid-Continent Independent System Operator (MISO), of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages sixty (60) days after the time that the BESS Project is placed in-service; and

k. there is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company owns the land on which the BESS Project will be constructed.

37. As required by ¶ 5(o) of the Stipulation and Agreement entered and approved in File No. EA-2023-0286, Ameren Missouri:

a. through witness Michels' Direct Testimony, is providing the information required by subsections i and ii;

b. through the Direct Testimonies of Arora, Wills, Michels, and Meyer, is providing testimony regarding what needs the BESS Project addresses, whether qualitative or quantitative, as well as the timing of those needs, as required by subsection iii;

b. through the Direct Testimony of Company witness Wills, is confirming that there are no regulatory treatments implicated by this filing, as required by subsection iv.; and

c. as described in this Application with reference to the Direct Testimonies of Ameren Missouri witnesses, testimony addressing questions 1-10, as required by subsection v.

IV. PRAYER FOR RELIEF

WHEREFORE, Ameren Missouri respectfully requests that the Commission issue a final order:

- Granting a CCN, pursuant to Section 393.170.1, RSMo., authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Big Hollow CTG Project in Jefferson County, Missouri;
- Granting a CCN, pursuant to Section 393.170.1, RSMo., authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Big Hollow BESS Project in Jefferson County, Missouri;
- Granting the Company variances from the requirement in 20 CSR 4240-20.045(6)(J) allowing the Company to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages sixty (60) days prior to the time when each Project will be placed in-service; and
- For such other and further relief as may be appropriate.

Respectfully submitted,

/s/ James B. Lowery
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ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

Schedule A

State of Missouri

Robin Carnahan, Secretary of State

File Number: 201025290083

X01083980

Date Filed: 09/09/2010

Expiration Date: 09/09/2015

Robin Carnahan

Secretary of State

Registration of Fictitious Name

This fictitious name filing shall expire 5 years from the date filed unless a renewal filing is submitted within 6 months prior to the expiration date.

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: **Ameren Missouri**

Business address: **One Ameren Plaza, 1901 Chouteau**

City, State and Zip Code: **St. Louis MO 63103**

If all parties are jointly and severally liable, percentage of ownership need not be listed.

Name of Owners, Individual or Business Entity	Street and Number	City and State	Zip Code	If listed, Percentage of ownership must equal 100%
UNION ELECTRIC COMPANY	One Ameren Plaza 1901 Chouteau Ave	St. Louis MO	63103	100%

In Affirmation thereof, the facts stated above are true:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060, RSMo)

Ronald S. Gieseke — **Assistant Secretary**

(Authorized Signature) — ***(Authorized Party Relationship)***

Schedule A

X001230414
Date Filed: 09/11/2020
Expire Date: 10/14/2025
John R. Ashcroft
Missouri Secretary of State

State of Missouri

John R. Ashcroft Secretary of State

Corporations Division
PO Box 778 / 600 W.Main St., Rm. 322
Jefferson City, MO 65102

Renewal of Fictitious Name

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417,RSMo)

Submission Type	Renewal
Reference Number	SR123305
Receipt Number	TR344755

The undersigned is doing business under the following name and at the following address:

Business name: Ameren Missouri **Charter #** X001230414

Existing Address: One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri, 63103, United States

Owner Information:

If a business entity is an owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed. Please attach a separate page for more than three owners. The parties having an interest in the business, and the percentage they own are:

Name of Owners, Individual or Business Entity	Charter # Required If Business Entity	City and State	If Listed, Percentage of Ownership Must Equal 100%
UNION ELECTRIC COMPANY	00040441	1901 Chouteau Avenue, St. Louis, Missouri, 63103, United States	100.0000

In Affirmation thereof, the facts stated above are true and correct:

The undersigned believes the statements presented in this filing are true and correct to the best of their knowledge and belief, they are subject to the penalties provided under section 575.040 RSMo. for making a false declaration under Section 575.060 RSMo

The undersigned agrees and represents that he/she is authorized to execute this document

Name	Craig W. Stensland On Behalf of UNION ELECTRIC COMPANY
Title	Owner
Date	09/11/2020

Schedule B

STATE OF MISSOURI

Denny Hoskins
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

UNION ELECTRIC COMPANY
00040441

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

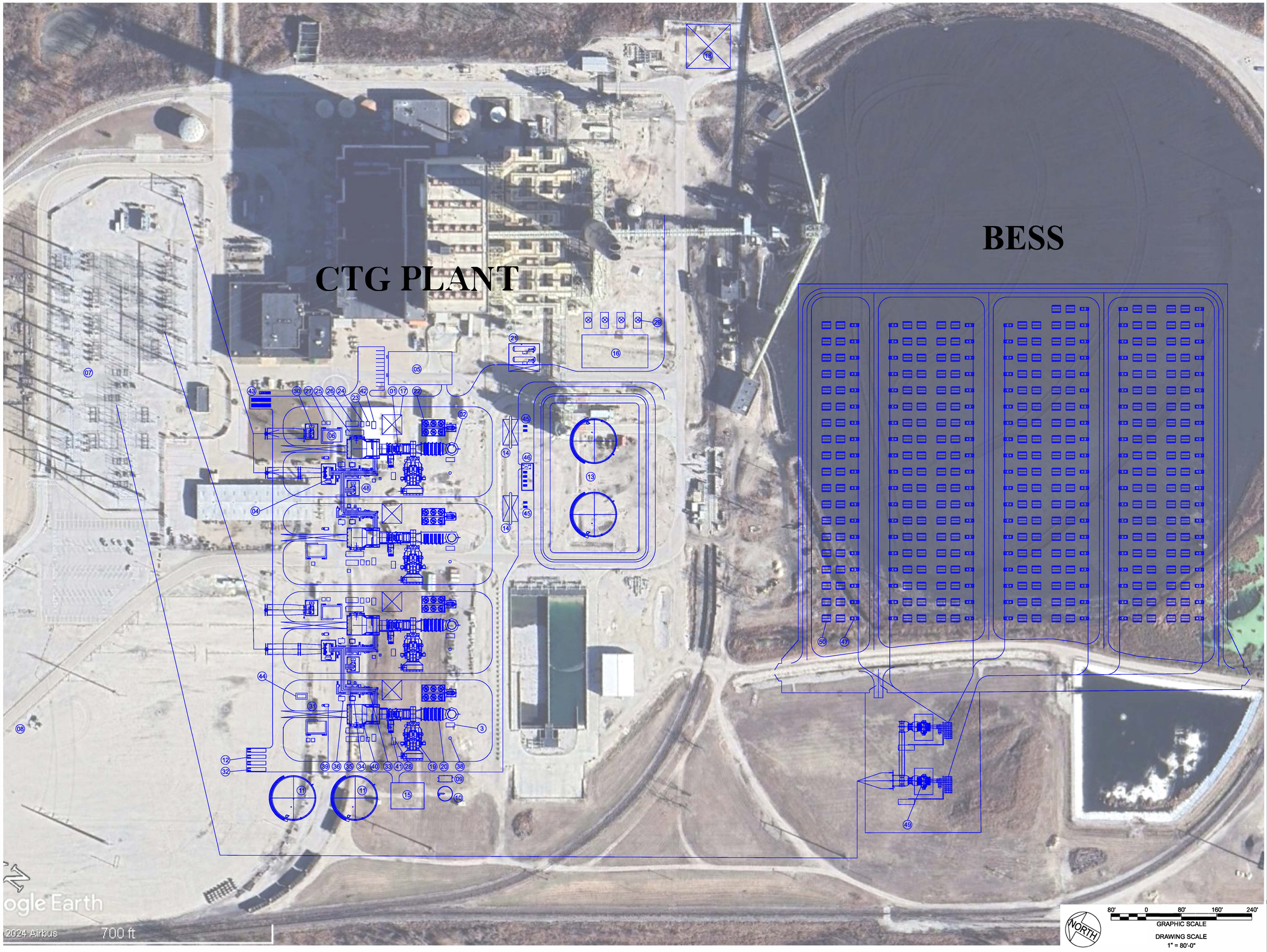
IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 14th day of February, 2025.

Denny Hoskins
Secretary of State

Certification Number: CERT-02142025-0091

Schedule C

01	COMBUSTION TURBINE	21	AMMONIA STORAGE	41	LUBE OIL CONTROL MODULE
02	EXHAUST STACK	22	FIN FAN COOLER	42	WATER INJECTION SKID
03	CEMS	23	FIRE PROTECTION FOR PEECC	43	HYDROGEN TRAILERS
04	GENERATOR STEP UP TRANSFORMER	24	WATER MIST FIRE PROTECTION	44	DIESEL GENERATOR
05	ADMIN/CONTROL BUILDING W/ MAINTENANCE SHOP	25	CTG ELECTRICAL PDC	45	FUEL OIL TRUCK UNLOADING PUMPS
06	ELECTRICAL PDC	26	LEC	46	FUEL OIL FORWARDING PUMPS
07	INTERCONNECTION FACILITIES	27	TRANSFORMERS	47	BATTERY ENCLOSURE
08	PLANT ENTRANCE	28	LIQUID FUEL PUMP SKID	48	UNIT AUX TRANSFORMER
09	FIRE PROTECTION PUMP HOUSE	29	FUEL GAS COMPRESSOR COOLERS	49	BESS MAIN POWER TRANSFORMER
10	SERVICE WATER/FIRE PROTECTION TANK	30	STATION SERVICE TRANSFORMER	50	POWER CONDITIONING SKID (INVERTER/TRANSFORMER)
11	DEMINERALIZED WATER TANK	31	CTG ROTOR REMOVAL AREA		
12	DEMINERALIZED WATER TRAILER W/ CANOPY	32	RO TRAILER		
13	FUEL OIL TANKS	33	VT COMPARTMENT		
14	FUEL OIL TRUCK UNLOADING	34	GT EXCITATION TRANSFORMER		
15	BOP MECHANICAL EQUIPMENT BUILDING	35	SEE/SFC PACKAGE		
16	FUEL GAS COMPRESSORS	36	ISOLATION TRANSFORMER		
17	TURBINE MAINTENANCE AREA	37	NOT USED		
18	FUEL GAS METERING YARD	38	FUEL GAS FINAL FILTER		
19	DILUTION AIR BLOWERS	39	FIRE PROTECTION SKID		
20	SCR	40	INLET FILTER		



HOLD INFORMATION

NO.	DESCRIPTION

CONTRACTOR/INSTALLER SHALL TAKE ALL APPROPRIATE PRECAUTIONS TO ENSURE THE SAFETY OF ALL PEOPLE LOCATED ON THE WORK SITE, INCLUDING CONTRACTOR'S/INSTALLER'S PERSONNEL (OR THAT OF ITS SUB-CONTRACTOR(S)) PERFORMING THE WORK.

RELEASE INFORMATION

REV.	DATE	DESCRIPTION
A	07-23-2024	FOR INFORMATION
B	08-15-2024	FOR INFORMATION
C	09-04-2024	FOR INFORMATION
D	02-20-2025	FOR INFORMATION

ISSUE PURPOSE: FOR INFORMATION

SPECIFICATION: -

PROJECT NO.: -

CAD FILE NAME: CBSC-MSK-GA-001.DGN

PREPARED BY: RAM

REVIEWED BY: RJ

APPROVED BY: -

Sargent & Lundy

SARGENT & LUNDY
55 EAST MONROE STREET
CHICAGO, ILLINOIS 60603-5780

PROJECT

AMEREN

RUSH ISLAND SIMPLE CYCLE

DRAWING TITLE

GENERAL ARRANGMENT
SITE ARRANGEMENT

DRAWING NUMBER	REVISION
RSH-MSK-GA-001	D
SHEET 1 OF 1	

80' 0 80' 160' 240'
GRAPHIC SCALE

DRAWING SCALE
1" = 80'-0"

2/20/2025 2:25:48 PM ...\Rush Island\RSH-MSK-GA-001.dgn

PL175030L0227(D:\Proposals\Ameren\Rush Island\RSH-MSK-GA-001.dgn
Form GDG-0401-01-08, ANSI (Imperial) MicroStation Border - Size E - 34 x 44
Revision 11A, Revision Date: 04-30-2010

VERIFICATION

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

This request is substantially consistent with the preferred resource plan required by 20 CSR 4240-Chapter 22.

/s/ Ajay K. Arora
Ajay K. Arora,
SVP, Chief Development Officer
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 the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 26th day of June, 2025.

/s/James B. Lowery
James B. Lowery