Exhibit No.:

Issues: BESS Project Description
Witness: Scott Wibbenmeyer
Type of Exhibit: Direct Testimony
Sponsoring Party: Union Electric Company
Case No.: EA-2025-0238

Date Testimony Prepared: June 26, 2025

### MISSOURI PUBLIC SERVICE COMMISSION

**FILE NO. EA-2025-0238** 

**DIRECT TESTIMONY** 

**OF** 

**SCOTT WIBBENMEYER** 

**ON** 

**BEHALF OF** 

UNION ELECTRIC COMPANY d/b/a Ameren Missouri

> St. Louis, Missouri June, 2025

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### DIRECT TESTIMONY

**OF** 

### SCOTT WIBBENMEYER

### **FILE NO. EA-2025-0238**

		<b>OF TESTIMONY</b>

- 2 Q. Please state your name and business address.
- A. My name is Scott Wibbenmeyer. and my business address is 1901 Chouteau
- 4 Avenue, St. Louis, Missouri 63103.
- 5 Q. By whom are you employed and what is your position?
- A. I am employed by Union Electric Company d/b/a Ameren Missouri ("Ameren
- 7 Missouri", or "Company") as Senior Director, Renewable Business Development and
- 8 Acquisitions.
- 9 Q. Please describe your educational background and employment experience.
- 10 A. I hold a Bachelor of Science in Mechanical Engineering from the University of
- 11 Missouri Columbia. I also hold a Master of Business Administration from the University of
- 12 Missouri St. Louis. I joined Ameren Missouri in 1999. In my roles since first joining Ameren
- 13 Missouri, I have served as a design engineer at the Callaway Energy Center managing projects to
- improve efficiency and reliability of plant equipment. Following my time at Callaway, my roles
- 15 included engineering management responsibilities for maintenance, production, and turbine
- operations for Ameren Missouri's fossil generation fleet. I was then promoted to General Executive
- of Coal Operations where I managed coal rail supply contracts. In 2007, I was promoted to the
- 18 renewable development organization, where I led development teams for biomass, wind, and solar
- 19 for Ameren Missouri. In 2015, I transitioned to Insurance Risk Management where I was

- 1 responsible for managing Ameren's financial risk and insurance portfolios. In 2019, I returned to
- 2 lead the Ameren Missouri renewables development and acquisitions organization.

### Q. What are your responsibilities in your current position?

A. I am currently responsible for leading the development of renewable and energy storage generation projects in support of three primary goals: (a) to comply with the Missouri Renewable Energy Standard; (b) to accomplish a reliable, resilient, and affordable transition of Ameren Missouri's generation portfolio to rely more on clean generation, while also using existing and planned dispatchable resources where appropriate; and (c) to support the development of customer renewable energy solutions such as the Company's Community Solar Program and the Renewable Solutions Program.

### Q. What is the purpose of your Direct Testimony in this case?

A. This testimony supports the Company's Application for a Certificate of Convenience and Necessity ("CCN") for a 400-megawatt<sub>AC</sub> ("MW"), four-hour battery energy storage system ("BESS") project ("the Big Hollow BESS Project" or "BESS Project"). Ameren Missouri is developing the Big Hollow BESS Project as part of its overall plan to meet its need to supply low-cost energy to its customers as part of a balanced supply-side portfolio consisting of dispatchable, renewable, and low-carbon generation and capacity resources. The 400 MW of energy storage for which the Company seeks authorization in this proceeding represents 40% of the 1,000 MW of the battery energy storage capacity proposed to be installed by 2030 as outlined in the Company's recently submitted 2025 Preferred Resource Plan ("PRP") (see File No. EO-2025-0235). I will also provide a description of the proposed Big Hollow BESS Project to be constructed at the site of the former Rush Island coal-fired plant, discuss its characteristics, the reason for its location, the Project schedule, and the engineering, procurement, and construction

## Direct Testimony of Scott Wibbenmeyer

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- 1 plans for the Project. Company witness Christopher Stumpf will provide testimony on these topics
- 2 for the 800 MW simple cycle combustion turbine generator ("CTG") for which the Company is
- 3 also requesting a CCN in this case. See Figure 1, which is a rendering of the Big Hollow Project
- 4 Site showing both the CTG and BESS installations.

Figure 1. Big Hollow CTG & BESS Project Site



Q. Where is the Big Hollow BESS facility located on the Rush Island site?

- A. The Big Hollow BESS facility will be located on reclaimed land previously used as the coal storage pile for the Rush Island coal facility located directly south of the new Big Hollow CTGs and southwest of the retired coal facility. The existing retired steam units at Rush Island will be dismantled starting later this year.
  - Q. Are you sponsoring any schedules?
- 13 A. Yes. I am sponsoring the schedules outlined below.
- Schedule SW-D1 BESS Location Screening
- Schedule SW-D2 BESS Scope of Work & Technical Specifications

- Schedule SW-D3 BESS Permit Matrix
- Schedule SW-D4 BESS Preliminary Site Layout

# Q. Earlier you mentioned the Big Hollow CTG Project. How are the two Projects related?

A. The Projects will be independent of each other due to different designs and inservice dates, but they will both take advantage of the existing Rush Island transmission interconnection, and both will provide dispatchable capacity on the Company's system. As Company witness Stumpf's Direct Testimony states, for the most part, the two projects will be treated as separate plants and except for water supply, their systems will not be common.

### II. BESS PROJECT DETAILS

### Q. Can you please describe the Big Hollow BESS Project?

A. The Big Hollow BESS Project is a 400 MW four-hour lithium iron phosphate BESS located on approximately 24 acres within the same parcel of land as the now retired Rush Island coal-fired facility, which is already owned by Ameren Missouri. The facility will consist of 400+ battery enclosure skids. Each battery enclosure skid consists of battery modules and support equipment housed in specially designed outdoor rated enclosures, with each container sized up to approximately 1 MW. Each container is approximately 30 feet long, 6 feet wide, and 9 feet high. The battery modules, monitoring and safety equipment, cooling equipment, and controls are assembled and tested at the factory and shipped to site within the enclosure, allowing each skid to be immediately ready for installation. On site, the battery skids will be placed on newly installed foundations, interconnected appropriately to other battery enclosures and wired to transformers to step up the 480-volt battery skid output voltage to 34.5 kilovolts ("kV"). The 34.5 kV output will then be routed to the new generator step-up ("GSU") transformers, increasing voltage to 345 kV

- before the site is interconnected through a short lead line to the point of interconnection within
- 2 Ameren Missouri's existing Rush Island transmission substation. The facility will be capable of
- 3 being monitored and controlled through the Company's Supervisory Control and Data Acquisition
- 4 ("SCADA") system allowing full remote operations to charge or dispatch the facility from the
- 5 Company's Energy Management and Trading department, similar to Ameren Missouri's other
- 6 renewables and gas turbine operations.
- 7 Q. Can you describe the current state of BESS deployment in the United States
- 8 similar to what is being installed at Big Hollow and whether this is proven and widely
- 9 adopted technology?
- 10 A. Yes. By the end of 2024, over 26 gigawatts ("GW") of utility-scale BESS was
- installed in the United States, with continued growth projections of an additional 19 GW of utility-
- scale BESS by the end of 2025. Utilities across the country have adopted BESS at scale, with
- projects ranging from 50 MW to 500+ MW. This rapid adoption and growth demonstrates that
- 14 BESS is a proven, scalable technology one that Ameren Missouri is well-positioned to leverage.
  - Q. What features make the addition of BESS at Big Hollow an ideal project for
- 16 Ameren Missouri's system?

- 17 A. The Big Hollow BESS project has many advantages for Ameren Missouri's system
- due to its inherent operational flexibility and fast response. It provides an immense amount of
- optionality allowing Ameren Missouri to meet its load needs in times of high demand, especially
- 20 during critical peak times in the summer or winter, similar to a CTG. In addition, it can be used
- as a tool to balance the potential mismatch between the time when solar may be generating at its
- 22 peak capacity, typically during the midday hours, to when peak load may occur such as the later

<sup>&</sup>lt;sup>1</sup> U.S. Energy Information Administration (EIA), U.S. Battery Capacity Increased 66% in 2024, March 2025.

evening hours. As more solar and wind are added to the grid, this functionality will be critical to maintaining reliability. Batteries play a key role in such load balancing because they can be dispatched nearly instantaneously without the time needed for startup as required by fossil resources. Balancing the installation of BESS systems with CTGs also has the advantage of increasing grid reliability during load events that occur quickly, but that also turn into a longer duration event. For example, if there is an event on the grid that causes a major loss of generation quickly, such as the system losing a major baseload plant or wind and solar production reducing quickly, the BESS system can respond almost immediately and help support the grid while the CTGs are quickly ramping up. Using these two technologies together enables Ameren Missouri to provide an excellent, ready source of peaking power for its customers and complement Ameren Missouri's existing fossil fleet and its expansion of renewable generation.

# Q. When is the BESS Project expected to go into operation and what are the driving factors for this timing?

A. The Big Hollow BESS Project is anticipated to be placed in service in the first quarter of 2028. There are two main drivers for the timing of the Project. First, the BESS Project will utilize Rush Island's existing interconnection rights via MISO's<sup>2</sup> Generator Replacement Process, which allows the project to avoid the lengthy MISO Large Generator Interconnection Process, thereby avoiding the associated project delays and additional transmission interconnection costs for Ameren Missouri customers. To utilize the existing interconnection rights, the project must be placed in-service by September 1, 2028. Second, the BESS Project will meet capacity needs starting in 2028 as discussed in greater detail in the Direct Testimonies of Company witnesses, Arora, Michels, and Meyer.

<sup>&</sup>lt;sup>2</sup> Midcontinent Independent System Operator, Inc.

### Q. Please describe Ameren Missouri's process for siting the proposed Project.

A. In 2024, the Company conducted a site selection screening for a BESS project within Ameren Missouri's service territory to meet its energy storage needs as first outlined in its 2023 Ameren Missouri Integrated Resource Plan filing, which at the time were 400 MW by 2030. The results of the screening yielded a clear hierarchy. The full results of the selection screening performed at that time are depicted in Highly Confidential **Schedule SW-D1**. Nothing has changed since then that would alter those results.

As **Schedule SW-D1** discusses, BESS projects have a significantly smaller footprint than solar and wind projects with a similar MW output. Therefore, there are many available properties suitable for BESS, both Ameren Missouri owned and available for purchase. Ameren Missouri focused on properties already owned by Ameren Missouri due to the number of available quality sites. We did so to avoid additional land expenses and to expedite development efforts. As discussed in **Schedule SW-D1**, the Rush Island site was identified as the best of the available sites. While there were several reasons for this, Rush Island scored well because of its layout and available land in proximity to the substation, and the ability to utilize the valuable interconnection rights at Rush Island without the risks or additional costs associated with a full MISO generator interconnection process, and because of its qualification for an additional 10% Energy Community Tax Credit Bonus under the Inflation Reduction Act ("IRA").

### III. BESS PROJECT DEVELOPMENT

### Q. How will Ameren Missouri develop the Big Hollow BESS Project?

A. The Big Hollow BESS Project is being self-developed by Ameren Missouri in a manner similar to how many of its generation projects have been completed. The Big Hollow BESS Project will be constructed under an Engineering, Procurement and Construction ("EPC") contract as discussed later in my testimony. The Project will be constructed in accordance with a

- 1 conformed version of the specifications attached to my testimony as Highly Confidential **Schedule**
- 2 SW-D2, which are the Company's standard Scope of Work and Technical Specifications for a
- 3 project of this type.

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- Q. Please describe how Ameren Missouri expects to execute the design, procurement, and construction of the Project.
  - On December 6, 2024, a request for proposal was issued seeking competitive bids A. for the EPC contractors. After conducting the comprehensive Request for Proposal ("RFP"), the Company has identified four potential contractors for the Big Hollow BESS, each of which have extensive experience in engineering and construction of large BESS systems. Pursuant to an executed EPC contract, the selected contractor will be responsible for the engineering, design, procurement of balance of system components, civil grading, and on-site equipment installation. The EPC contract will also include options for Ameren Missouri to purchase the battery equipment directly from the equipment manufacturer. Under such a structure, it is expected Ameren Missouri would utilize the EPC contractor to support the execution of a Battery Energy Storage Supply Agreement while also transferring certain delivery and battery supply obligations to the EPC to assure the project remains on budget and schedule. The direct buy option will continue to be evaluated as the EPC contract is negotiated with the final decision being dependent on the EPC selected and overall project benefits, such as the negotiated cost savings available through reduced mark-ups of the equipment by the EPC vendor. Under the EPC contract the selected contractor will deliver all services for the agreed upon price and will adhere to a detailed scope of work that include specifications for the Big Hollow BESS. In addition, the Company has experienced personnel in place to provide oversight and ensure appropriate execution of the EPC Agreement and is confident in its ability to successfully execute the Big Hollow BESS project.

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1	Q.	Please describe the process by which Ameren Missouri issued the RFP.
2	A.	As noted, the Company performed a competitive bid process for the EPC contract.
3	For this pro	oject, the Company issued an RFP to a select list of bidders. This list was generated
4	based on fir	rms with leading industry experience and with which Ameren Missouri has experience,
5	either with	prior bid processes or in directly working for Ameren Missouri on earlier projects.
6	Ultimately,	the contractor list was developed based on the following criteria:
7		• Firms that have successfully completed other BESS projects of a similar size and
8		scope;
9		• Firms that have expressed a desire to bid and have the resources and throughput to
10		research and compile a quality bid for Ameren Missouri's review;
11		• Firms that have leading BESS engineering, construction or manufacturing
12		experience.
13	Based on th	ne criteria, seven bidders were selected to receive the RFP. Of those selected, four
14	bidders sub	mitted a response to the RFP. Ameren Missouri evaluated each bidder's response in a
15	consistent a	and objective manner. Responses to questions or requirements identified in the RFP
16	formed the	basis of the evaluation.
17	Q.	Please describe the evaluation process utilized to score the RFP responses.
18	A.	The Company, with the support of Sargent and Lundy, a leading outside
19	independen	t engineering services firm, developed an RFP scorecard matrix to evaluate the
20	submittals.	Sargent & Lundy provided input on scorecard development, including detailed cost
21	breakdown	templates, attributes to use for scoring, and adjustments to weightings of the attributes.
22	Utilizing th	e scorecard, bid submittals were evaluated on several key factors that include, but were

not limited to, the following: compliance with specification format and completeness of bid

- proposal, design, supplied technology and major equipment selection, safety record, project plan, project team and staff, past performance and references, project schedule, commercial terms and conditions of contract, and price. Upon completion of the RFP evaluation matrix and bid evaluations by both Ameren Missouri and Sargent and Lundy, Ameren Missouri has engaged the top vendors for contract negotiations. Pending successful EPC contract negotiations, the Company anticipates executing an EPC contract in the coming months with the top vendor. Sargent & Lundy will continue to provide support to Ameren Missouri throughout the bidder review, scoring, and negotiation phases of the RFP process.
  - Q. Please describe how Ameren Missouri expects to execute key equipment supply contracts.
  - A. Due to long lead times associated with power transformers and circuit breakers throughout the industry, Ameren Missouri has already begun sourcing two GSU transformers and two 345kV circuit breakers outside of the main EPC procurement event. These items will be provided by Ameren Missouri for the project. The remainder of the key project equipment (battery containers, inverters, collector substation equipment, 345kV generator tie line, etc.) will likely be supplied as part of the main EPC contract; however as noted above, Ameren Missouri continues to evaluate the option to direct purchase certain battery equipment under the terms of the EPC contract.
  - Q. Please describe the process by which Ameren Missouri issued or will issue the RFP for key equipment procurement.
  - A. The Company utilized a competitive bid process, similar to what was utilized for the EPC contractor, to procure two 225 MVA 345kV/34.5kV GSU transformers. A total of nine transformer suppliers were solicited via a request for information process to determine their intent

- 1 to bid and ability to meet the key project milestones. RFPs were submitted to four suppliers to
- 2 obtain bids using standard Ameren power transformer specifications with project specific
- 3 information added for the BESS project. Two vendors supplied bids for this project. Bids were
- 4 evaluated using a scorecard which considered many factors including cost, quality, adherence to
- 5 the Ameren Missouri specification, and the ability to meet the project schedule. After scoring bids
- 6 with the project and sourcing teams it was decided to procure GSU transformers from Hitachi. A
- 7 purchase order was placed on January 10, 2025, to secure two production slots for these
- 8 transformers.
- 9 For the two required 345kV circuit breakers, Ameren Missouri has an existing negotiated
- 10 contract with Mitsubishi Electric Power Products Inc. ("MEPPI") for a certain number of
- production slots each year at agreed upon pricing. Ameren Missouri placed a purchase order for
- the first circuit breaker on January 17, 2025, to secure the first slot and is expected to place the
- second purchase order in mid-2025 based on the available slot and the lead time requirements with
- 14 MEPPI.

- Q. Please summarize the status of development for the Project.
- 16 A. The Big Hollow BESS Project has made meaningful progress in the following key
- areas making it a mature development:
- 1. All necessary land for the project is presently owned by the Company, ensuring the
- Project footprint is secured and ready for construction activities upon receipt of
- approval;
- 2. An RFP to secure an EPC contractor has been issued and bids have been received,
- 22 providing a clear framework for project execution and indicative pricing;

1 3. EPC contracts, along with the associated battery supply contracts, are being negotiated 2 with the leading vendors. Contract execution is anticipated in the coming months; 3 4. Contracts have been issued for the two GSU transformers and 345 kV breakers; 4 5. The Project has submitted an application for MISO's Generation Replacement Process 5 and has received the results of the Replacement Impact Study which indicates the 6 project will not have a material adverse impact on the Transmission System. Therefore, 7 no network upgrades are necessary; 8 6. There are no required environmental studies, surveys, or agency consultations for the 9 Big Hollow BESS Project since the Company is re-developing a brownfield site; 10 7. Standard engineering studies including a topographic and geotechnical study have been 11 completed. These studies confirm the feasibility and technical readiness of the site for 12 development; 13 8. A conceptual design which includes a one-line diagram and a layout has been 14 completed by the Company's independent engineering consultant, Sargent and Lundy; 15 9. Construction related permits will be required for the Project from Jefferson County, 16 the Missouri Department of Natural Resources ("MDNR"), and other entities. See 17 Schedule SW-D4 for a list of Project permits.; and 18 10. The Project will be constructed entirely within the boundaries of the retired Rush Island 19 coal plant's parcel of land. Any utilities the project crosses are owned and operated by 20 Ameren Missouri. In addition, demolition of the existing coal plant facilities will de-21 energize, decommission, and remove the majority of utilities owned by Ameren 22 Missouri on the plant property prior to the start of construction of the BESS facility.

BESS PROJECT COSTS AND RISKS

Direct Testimony of Scott Wibbenmeyer

IV.

1 2 Q. What is the expected total cost of the Big Hollow BESS Project, including the EPC contract and all equipment supply agreements? 3 4 A. The BESS Project has an estimated base total capital cost of \*\*\* 5 6 transmission interconnection costs, materials, construction, project diligence, governance, quality 7 assurance, financing and oversight costs to ensure the Project is being built to Ameren Missouri's specifications for a warranted asset life of at least 15 years. Several of the risks that drive the risk-8 9 adjusted cost estimate are identified and discussed later in my testimony, and overall project 10 economic modeling and results are presented in the Direct Testimony of Company witness 11 Michels. The key variance between the base and risk-adjusted estimates is a greater contingency 12 allowance to account for market volatility and other government actions, such as tariffs. 13 Q. What are the potential risks associated with the BESS Project, and how is 14 Ameren Missouri planning to mitigate those risks should they arise? 15 A. All projects carry risks, and that is true for the Big Hollow BESS Project. The 16 identified risks for the Project are related to procurement/construction and change in law/tariffs. 17 Q. Please address procurement/construction-related risks. 18 As noted, a key risk for the BESS Project is successfully negotiating the EPC A. 19 contract along with the associated battery supply contracts to assure timely project execution while 20 also navigating the volatile market. Ameren Missouri has mitigated this risk by completing an 21 RFP process and is continuing to do so via engagement with the potential EPC contractors 22 identified as part of that process, each of whom has experience contracting with Ameren Missouri. 23 The Company is also working with leading suppliers in the BESS industry. This mitigation has allowed advanced coordination with project teams, detailed scope clarity with EPC contractors 24

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### Direct Testimony of Scott Wibbenmeyer

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- 1 and battery suppliers, and improved the sequencing of equipment orders and construction
- 2 activities. Furthermore, this will allow Ameren Missouri to select the key EPC contractor in
- 3 sufficient time to support ordering battery and balance of plant equipment prior to the end of 2025
- 4 to maintain a Q1 2028 in-service date while also providing appropriate float to assure the facility
- 5 is in service prior to the expiration of the interconnection rights on September 1, 2028.

### Q. Please address potential change in law/tariff risks.

- A. As referenced above, another key risk associated with BESS is related to supply
- 8 risks and change in law/tariffs. Ameren Missouri has engaged with leading EPCs and battery
- 9 suppliers that actively seek a diverse mix of cell suppliers to mitigate any issues with obtaining
- adequate supply within the United States and globally. These companies have been in the battery
- industry for years or decades and continue to successfully navigate the challenging Lithium-Ion
- BESS market and its volatility. This includes domestic supply of battery cells to establish a local
- supply of cells and to mitigate tariff risks associated with Chinese-made cells.
- In addition, Ameren Missouri continues to leverage its market intelligence partners to stay
- on top of market trends and changes throughout the project life cycle and will include liquidated
- damages provisions for substantial completion milestones within its battery supply contracts to
- incentivize the supplier to procure and deliver battery components per the contracted schedule.
- Finally, Ameren Missouri will require at least 45% of the battery cells to be domestically
- sourced, both to take advantage of the cost savings due to the 10% Domestic Content Bonus to
- available investment tax credits ("ITC") and to reduce exposure to tariffs on imported cells. I
- 21 will address the ITCs we expect to utilize for the BESS Project in greater detail below.
- Q. You mentioned the Company's pursuit of tax credits for the BESS Project.
- 23 Please elaborate on the tax credits Ameren Missouri is pursuing for BESS Project.

### Direct Testimony of Scott Wibbenmeyer

A. As the Commission is aware, the IRA extensively modified provisions of the tax code for renewable energy projects. The IRA extended both the ITC and production tax credits ("PTC"), created additional wage and apprentice ("W&A") requirements that projects must meet to qualify for the full ITC or PTC value, and added additional bonus credit amounts for domestic content and for projects located in an energy community (i.e., a brownfield site, retired coal generating site or an area with significant previous employment related to oil, gas, or coal activities). The passage of the IRA enables BESS projects to utilize the ITC (previously solar projects could only elect the ITC) and allows federal taxpayers the ability to transfer tax credits to unrelated parties for cash. This both expands and improves the available tax credit and financing options for a utility-scale BESS project such as the Big Hollow BESS Project. The Company is pursuing use of the ITC for the BESS Project and currently expects that the BESS Project will be eligible for the base 30% ITC, an additional 10% Energy Community Bonus, and a 10% Domestic Content Bonus. These tax credit incentives can be stacked with the total potential to take advantage of a 50% ITC.

# Q. How will the tax credits associated with the BESS Project be returned to Ameren Missouri customers?

A. The ITC associated with the BESS Project will directly benefit customers by reducing the overall capital cost of the project, which translates into lower rates or avoided cost increases as compared to the impact of the Project absent the tax credits. The tax credits offset the initial investment in the BESS Project and lower ongoing revenue requirements for cost recovery. The savings generated by these tax credits are factored in the rate-making process as they will be captured in the IRA tracker agreed upon and approved by the Commission in File No. ER-2022-

- 1 0337, ensuring that the financial benefits flow directly to Ameren Missouri customers in the form
- 2 of reduced rates over the life of the assets.
- Q. There have been a lot of discussions in the press about whether the IRA tax
- 4 credits will remain in place, or for how long, under the budget bills being debated by
- 5 Congress. Would you please update the Commission on the status of tax credit availability
- 6 for the BESS Project under the IRA?
- 7 A. The latest information from the proposed tax changes by the House Ways and
- 8 Means Committee to be included in the budget reconciliation bill suggests that the IRA tax credits
- 9 projected to be generated by the BESS Project will continue to be available so that the tax benefits
- 10 may be passed on to Ameren Missouri customers. The BESS Project anticipates starting
- 11 construction using the "Safe Harbor" tax strategy this year and is expected to be placed in service
- 12 prior to 2029. Under those circumstances, under the proposed legislation being debated by
- 13 Congress, the BESS Project would continue to qualify for the 30% base ITC and the Energy
- 14 Community and Domestic Content Bonuses totaling an additional 20%.

### 15 V. OTHER ISSUES

- Q. Are there any benefits to the state and the local community driven by
- 17 construction of the BESS facility?
- 18 A. Yes. The Project will generate significant economic benefits, including the creation
- of construction jobs during the build-out phase, permanent operations and maintenance jobs once
- 20 the projects are in-service, and ongoing contributions to local communities through property taxes.
- 21 More specially, it is anticipated that the Project will provide over 100 direct jobs at peak
- 22 construction.

Direc	t Testimony	of
Scott	Wibbenmey	er

1	In ad	dition to these direct economic benefits, indirect benefits will be realized throughout
2	project const	cruction by restaurants, gas stations, hotels, stores and other businesses in the vicinity
3	of the Projec	t. The benefits will be felt throughout the state of Missouri.
4	Q.	Please describe the criteria by which Ameren Missouri will use to determine
5	that the Big	Hollow BESS Project is in-service.
6	A.	Ameren Missouri is not aware of historical in-service criteria having been
7	established f	for BESS installations by electric utilities regulated by the Commission. Therefore,
8	Ameren Mis	souri intends to work with its EPC contractor, independent engineer, and Commission
9	Staff to deve	lop such criteria upon execution of the EPC and supporting battery supply contracts.
10	It would be	the expectation that the parties will establish and agree upon in-service criteria prior
11	to the full no	tice to proceed with the EPC contractor, which is anticipated in the first half of 2026.
12	Q.	Is Ameren Missouri seeking any variances from the CCN rules relating to the
13	BESS Proje	ct?
14	A.	Yes, the Company requests a variance from the requirement in 20 CSR 4240-
15	20.045(6)(J)	which would allow the Company to submit an overview of its plans for restoration of
16	safe and adec	quate service after significant, unplanned/forced outages sixty (60) days after the time
17	when the Pro	oject is placed in-service.
18		VI. CONCLUSION
19	Q.	Does this complete your testimony?
20	A.	Yes.

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Applicat Company d/b/a Ameren Mis Approval and Certificate of	souri for Permission and Public Convenience and	) ) File No.: EA-2025-0238
Necessity Authorizing it to C Facility and Battery Energy		)
AF	FIDAVIT OF SCOTT WIB	BENMEYER
STATE OF MISSOURI	) ) ss	
CITY OF ST. LOUIS	) 55	
Scott Wibbenmeyer, being fi	irst duly sworn on his oath, sta	ntes:
My name is Scott W	ibbenmeyer, and hereby decla	re on oath that I am of sound mind and
lawful age; that I have prepa	red the foregoing Direct Testi	mony; and further, under the penalty of
perjury, that the same is true	and correct to the best of my	knowledge and belief.
		ott Wibbenmeyer

Sworn to me this 26<sup>th</sup> day of June 2025.

# EA-2025-0238

# Schedule SW-D1 is Highly Confidential in its Entirety

# EA-2025-0238

# Schedule SW-D2 is Confidential in its Entirety

### **BESS PERMIT MATRIX**

Agency	Permit
Missouri Department of Natural Resources (MoDNR) and Jefferson County Department of Public Works	Land Disturbance Permits
Missouri Department of Transportation (MoDOT)	Highway Permits
Jefferson County Department of County Services & Code Enforcement	Commercial Building Permit*
Jefferson County Department of County Services & Code Enforcement	Site Drainage & Floodplain Development
Jefferson R7 Fire Department	Occupancy Permit*

<sup>\*</sup>Only required for occupied structures (e.g. office or storage buildings, not required for operating plant equipment.)





