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Witness: Steven M. Wills  
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Sponsoring Party: Union Electric Company  
File No.: EA-2025-0238  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**File No. EA-2025-0238**

**DIRECT TESTIMONY**

**OF**

**STEVEN M. WILLS**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY,**

**d/b/a Ameren Missouri**

**St. Louis, Missouri  
June 2025**

**P**

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**DIRECT TESTIMONY**

**OF**

**STEVEN M. WILLS**

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

**I. INTRODUCTION**

1

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

3           A.     Steven M. Wills, One Ameren Plaza, 1901 Chouteau Avenue, St. Louis,  
4     Missouri 63103.

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

6           A.     I am employed by Union Electric Company, d/b/a Ameren Missouri  
7     ("Ameren Missouri" or "Company"), as the Senior Director of Regulatory Affairs.

8           **Q.     Please describe your professional background and qualifications.**

9           A.     I received a Bachelor of Music degree from the University of Missouri-  
10    Columbia in 1996. I subsequently earned a Master of Music degree from Rice University  
11    in 1998, then a Master of Business Administration ("M.B.A.") degree with an emphasis in  
12    Economics from St. Louis University in 2002. While pursuing my M.B.A., I interned at  
13    Ameren Energy in the Pricing and Analysis Group. Following completion of my M.B.A.  
14    in May 2002, I was hired by Laclede Gas Company as a Senior Analyst in its Financial  
15    Services Department. In this role, I assisted the Manager of Financial Services in  
16    coordinating all financial aspects of rate cases, regulatory filings, rating agency studies and  
17    numerous other projects.

1 In June 2004, I joined Ameren Services as a Forecasting Specialist. In this role, I developed  
2 forecasting models and systems that supported the Ameren operating companies' involvement in  
3 the Midwest Independent Transmission System Operator, Inc.'s ("MISO")<sup>1</sup> Day 2 Energy  
4 Markets. In November 2005, I moved into the Corporate Analysis Department of Ameren  
5 Services, where I was responsible for performing load research activities, electric and gas sales  
6 forecasts, and assisting with weather normalization for rate cases. In January 2007, I accepted a  
7 role I briefly held with Ameren Energy Marketing Company as an Asset and Trading Optimization  
8 Specialist before returning to Ameren Services as a Senior Commercial Transactions Analyst in  
9 July 2007. I was subsequently promoted to the position of Manager, Quantitative Analytics, where  
10 I was responsible for overseeing load research, forecasting and weather normalization activities,  
11 as well as developing prices for structured wholesale transactions.

12 In April 2015, I accepted a position with Ameren Illinois as its Director, Rates & Analysis.  
13 In this role, I was responsible for the group that performed Class Cost of Service, revenue  
14 allocation, and rate design activities for Ameren Illinois, as well as maintained and administered  
15 that company's tariffs and riders. In December 2016, I accepted a position with the same title at  
16 Ameren Missouri. In July of 2022, I was promoted to Director, Regulatory Affairs, and in January  
17 2024 promoted to Senior Director, Regulatory Affairs. In this role, I oversee the teams responsible  
18 for contributing to all aspects of the Company's state regulated activities, including the Rates and  
19 Analysis team I previously directed.

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<sup>1</sup> Now known as the Midcontinent Independent System Operator, Inc.

**II. PURPOSE OF TESTIMONY AND INTRODUCTION OF WITNESSES**

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to describe generally the Company's application for a Certificate of Convenience and Necessity ("CCN") for the Big Hollow Energy Center ("Big Hollow" or "Projects"), which will consist of an approximately 800-Megawatt ("MW") simple-cycle, natural gas combustion turbine generator ("CTG") plant as well as a 400 MW<sub>AC</sub> Battery Energy Storage System ("BESS") plant (together, "Projects" or "Big Hollow Projects"). Both facilities are planned to be constructed and placed into service as a part of the Company's portfolio of generating resources by September 1, 2028.<sup>2</sup> I will address the *Tartan* Factors the Commission typically uses in the evaluation of CCNs and explain why granting the CCN is in the public interest. Finally, I will address certain items required by a Stipulation and Agreement entered into by the Company and certain other parties and approved by the Commission in resolution of File No. EA-2023-0286.

**Q. What other testimony is being filed to support Ameren Missouri's application?**

A. Other Ameren Missouri witnesses filing testimony in this case and the subjects each testimony addresses are as follows.

1. Ajay Arora – the need for the Big Hollow Projects and how the generation is consistent with the Company's Integrated Resource Plan.
2. Andrew Meyer – resource adequacy impact of the Big Hollow Projects.
3. Matt Michels – the need, economic impact, and benefits of the Big Hollow Projects.
4. Darryl Sagel – financing plans for the Big Hollow Projects.
5. Chris Stumpf – description of the 800-megawatt Big Hollow CTG Project.

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<sup>2</sup> The BESS facility will be placed in service as individual cells are completed starting in 2027 and ending by September 1, 2028.

6. Scott Wibbenmeyer – description of the 400-megawatt Big Hollow BESS Project.

**Q. Please provide a high-level overview of the Projects.**

A. The Big Hollow Energy Center will be located on a portion of the site of the Company's recently retired Rush Island Energy Center. It will include a CTG plant consisting of four units, each with a net summer capability of approximately 175 megawatts ("MW") and approximately 200 MW in the winter. The CTG plant will be fueled by natural gas during most hours but will have fuel oil-fired backup capability to ensure reliability in the coldest winter weather when natural gas supplies can become constrained due to high heating demand. The site will also host Ameren Missouri's first large scale deployment of BESS, with the installation of a total of 400 MW<sub>AC</sub> of storage capability.

**Q. Why is Ameren Missouri proposing construction of the Big Hollow Energy Center?**

A. As discussed in the Direct Testimonies of Company witnesses Matt Michels, Andrew Meyer, and Ajay Arora, the Projects are needed to develop capacity required to ensure reliability with the growth in demand expected from large load customers, such as data centers and other advanced manufacturing customers that are seeking, or may seek in the near future, retail electric service from the Company. On February 13, 2025, the Company filed a Notice of Change in Preferred Resource Plan associated with its Integrated Resource Plan ("IRP"), which identified a need for the acceleration of certain generation, otherwise planned to be developed later in the planning horizon, due to changes in load expectations arising from the high level of interest the Company was receiving from large load customers (including over 2 gigawatts ("GW") of executed construction agreements as explained by witness Arora in his Direct Testimony), as well as a reduction in the level of energy efficiency program savings expected as an outcome of the

1 Company's most recent application for approval of energy efficiency programs under the Missouri  
2 Energy Efficiency Investment Act. There is a high probability that the level of large load interest  
3 will result in significant new load on the Company's system. As little as 500 MW of new load,  
4 which is highly likely to be realized and exceeded, would result in the need for additional capacity  
5 resources.

6 Further, as discussed in more detail in witness Michels' Direct Testimony, there are  
7 additional planning and risk mitigation benefits that arise from the Big Hollow investments even  
8 in the very unlikely scenario where no large load customers materialized at all; benefits related to  
9 future flexibility in managing the Company's generation fleet as existing generation resources age  
10 and environmental regulations evolve. The high probability that at least enough load growth to  
11 warrant the additional capacity, along with the other planning and flexibility benefits that arise  
12 from the Big Hollow Projects, make the approval of these Projects a common sense and no-regrets  
13 decision.

14 **III. THE PROJECTS ARE NECESSARY OR CONVENIENT**  
15 **FOR THE PUBLIC SERVICE**

16 **Q. What do you understand to be the requirements to obtain a CCN for a**  
17 **generating plants like Big Hollow?**

18 A. The primary concern for the Commission in determining whether to grant a CCN  
19 for a generating plant is whether the proposed plant is in the public interest—specifically, whether  
20 the proposed plant is "necessary or convenient for the public service." Staff has explained the  
21 nature of the Commission's analysis of CCN requests in a previous filing:

22 In explaining the nature of its analysis [of CCN requests], the Commission  
23 stated the following:

**Necessary or Convenient for the Public Service**

The Court of Appeals has said that "[f]or some reason, either intentional or otherwise, the General Assembly has not seen fit to statutorily spell out any specific criteria to aid in the determination of what is 'necessary or convenient for the public service' within the meaning of such language as employed in Section 393.170 . . . . The dominant purpose in creation of the Commission is public welfare. The administration of its authority should be directed to that purpose. In every case where it is called upon to grant a permit, or to authorize an additional service to be rendered by an authorized certificate holder, the Commission should be guided, primarily, by considerations of public interest."<sup>3</sup>

In approving a CCN for gas-fired peaking units at Aquila's South Harper plant, the Commission affirmed Staff's description of the Commission's primary consideration when faced with a CCN request, stating:

The dominant purpose in creation of the Commission is public welfare. The administration of its authority should be directed to that purpose. In every case where it is called upon to grant a permit, or to authorize an additional service to be rendered by an authorized certificate holder, the Commission should be guided, primarily, by considerations of public interest.<sup>4</sup>

Applying this standard, the Commission concluded that the peaking plants at South Harper would "promote the public interest."<sup>5</sup> In sum, the primary question before the Commission in this case is whether the Big Hollow Projects are in the public interest.

**Q. Does the Commission generally use guidelines in making the determination you just described?**

A. Yes, for many years the Commission has used the so-called "*Tartan* Factors" as a guideline.

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<sup>3</sup> File No. EA-2006-0309, *Staff's Post-Hearing Brief*, p. 6, issued May 12, 2006 (case citations omitted).

<sup>4</sup> File No. EA-2006-0309, *Report and Order*, p. 23, issued May 23, 2006.

<sup>5</sup> *Id.*, p. 56.

1           **Q.     What are the *Tartan* Factors?**

2           A.     The "*Tartan* Factors" were adopted by the Commission as guidelines for  
3     evaluation of CCN applications in its decision in *In Re Tartan Energy Co., L.C.*, No. GA-94-127,  
4     1994 WL 762882 (Sept. 16, 1994). The factors are as follows:

- 5           1. Is there a need for the resource?
- 6           2. Is the applicant qualified to operate the proposed resource?
- 7           3. Does the applicant have the financial ability to develop or acquire the resource?
- 8           4. Is the resource economically feasible; and
- 9           5. Does granting the CCN for the resource promote the public interest?

10     I will discuss these factors and how consideration of each of them supports the conclusion that the  
11     Projects are in the public interest, thereby supporting the Company's request that the Commission  
12     grant the CCNs.

13           **a.     *Tartan* Factor 1: The Project is Needed**

14           **Q.     How does the Missouri Public Service Commission define necessity for**  
15     **purposes of CCN applications such as this case?**

16           A.     First, as a threshold matter, it is instructive to consider what the Commission had  
17     to say about this factor in the *Tartan* case itself. In *Tartan*, the Commission made clear that "[t]he  
18     term 'necessity' does not mean 'essential' or 'absolutely indispensable,' but that an additional  
19     service would be "an improvement justifying its cost." *Tartan* involved a request for an area  
20     certificate covering new natural gas service to several communities in southern Missouri, for which  
21     new gas distribution infrastructure would need to be built to provide the service. The communities  
22     in question were relying on propane or other sources of fuel at the time, and the Commission  
23     engaged in a fairly robust discussion of factors that support issuance of a CCN. The Commission

1 determined that need was satisfied in the case and considered the following factors: the  
2 communities' "preference" for natural gas, the positive economic development impacts that  
3 granting the CCN would promote, and the potential for lower energy costs for consumers. By  
4 doing so, it did not anchor itself to one criterion in deciding whether a need existed but considered  
5 the totality of the evidence based on a broad view of the benefits of the project.

6 **Q. Would you please elaborate further on why the Projects satisfy the *Tartan***  
7 **Factor of need?**

8 A. Yes. As I noted earlier, the need for the Projects arises from the Company's  
9 analysis in its 2025 Notification of Change in Preferred Resource Plan ("PRP") within its IRP,  
10 including analysis of the large load customers actively seeking service, and/or expected to seek  
11 service, within the Company's service territory.

12 Mr. Michels' direct testimony details the important role of both Big Hollow projects in  
13 ensuring the Company's ability to meet the expected level of demand emerging in its service  
14 territory. Additionally, the Projects will add accredited capacity to the Company's generation  
15 portfolio that will help enhance reliability in all seasons with or without new large load customers,  
16 and will reduce the Company's and its customers' exposure to volatile and tight MISO capacity  
17 markets, will add the needed dispatchability to partner with low-cost renewable energy sources  
18 reflected in the Company's PRP, and will help create flexibility to address risks associated with an  
19 aging generation fleet and constantly evolving environmental regulations of that fleet. In summary,  
20 the Big Hollow Projects are needed because they have a significant role in the development of the  
21 appropriate resource mix to ensure reliability for Ameren Missouri's customers in the future,  
22 especially given the reality of rapidly increasing load growth expectations.

Direct Testimony  
of Steven M. Wills

1           **b.       Tartan Factor 2: The Company is Qualified to Operate the Project.**

2           **Q.       How does the Company satisfy Tartan Factor 2?**

3           A.       The Company has safely and reliably operated thousands of MW of generation,  
4 including generation associated with a wide variety of fuel sources and technologies, for decades.  
5 With respect to gas-fired CTGs specifically, witness Chris Stumpf's Direct Testimony explains  
6 that the Company currently owns and operates 43 unique simple cycle CTG units at 12 different  
7 plant locations. The Company is clearly qualified to operate the CTGs at Big Hollow once they  
8 become operational. And while the Company does not have the same historical experience owning  
9 and operating battery storage technology at the scale as will be present at Big Hollow, as a large  
10 utility with thousands of experienced employees and connections to industry organizations and  
11 peer utilities from which to understand best practices, it has the resources, expertise, and  
12 wherewithal to successfully integrate the operations of battery technology, just as it has integrated  
13 new technologies in the past when introducing new forms of electrical generation (i.e., there was  
14 a first time for coal generation, gas generation, nuclear generation, landfill gas generation, wind  
15 generation, solar generation, etc., and the Company now successfully operates each of those  
16 technologies). Company witness Scott Wibbenmeyer addresses the Company's qualifications in  
17 his Direct Testimony.

18           **c.       Tartan Factor 3: The Company has the Financial Ability to Develop the**  
19                   **Project.**

20           **Q.       Please address Ameren Missouri's financial ability to develop the resource.**

21           A.       As discussed further in the Direct Testimony of Company witness Daryl Sagel,  
22 Ameren Missouri has the financial capability to generate and raise the capital needed to develop  
23 the resource in question. The upfront capital cost of the Big Hollow Projects is estimated to be  
24 approximately \*\*\* \_\_\_\_\_ \*\*\* The Company's existing rate base – financed by an

1 appropriate balance of debt and equity – exceeds \$13 billion, and its planned capital additions over  
2 the coming five years (not including the Projects) also exceeds \$16 billion. The Company has  
3 sufficient access to capital markets based on, among other things, its stable issuer credit ratings of  
4 Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies respectively. I expect  
5 there to be little question regarding the Company's financial wherewithal to undertake the Big  
6 Hollow Projects.

7 **d. Tartan Factor 4: The Projects are Economically Feasible.**

8 **Q. Please address the economic feasibility of the Projects.**

9 A. The Big Hollow Projects each represent an improvement justifying its cost. This is  
10 because the Projects are needed resources to reliably serve customers' capacity requirements,  
11 including capacity requirements of expected large load customers, and to mitigate certain risks.  
12 The Commission has recognized that when a project is needed, the economic feasibility question  
13 largely turns on whether the utility can finance the project which, as discussed earlier, is not an  
14 issue with respect to the Projects. The economic feasibility of the Projects is also supported by  
15 other facts.

16 The Company's IRP is used to establish the Company's PRP. In selecting the PRP, the  
17 primary selection criterion is minimization of the net present value of revenue requirement –  
18 essentially, this means that the PRP is selected based on an assessment of the "least cost" portfolio  
19 available to meet customers' energy and capacity needs, consistent with other secondary planning  
20 objectives and risk assessments. The IRP analysis underlying the Company's Notification of  
21 Change in Preferred Resource Plan demonstrates that the Company's PRP, which includes the  
22 proposed Big Hollow Projects, is a cost-effective means of providing the energy and capacity

resources needed to reliably serve customers over time, supporting the conclusion that the Project is economically feasible.

**Q. Are there other characteristics of the Projects that also support a finding of economic feasibility?**

A. Yes, consistent with items that the Commission has relied on in past CCN cases in its analysis of economic feasibility, these Projects will create jobs and tax revenues within the state and within the Company's service territory and will lessen the Company's reliance on the MISO capacity market. Moreover, the Projects' contracting for equipment and construction activities is largely the product of competitive bidding and otherwise followed the Company's well-established procurement policies and procedures to ensure the projects are built at a competitive market-based cost. Further, the projects take advantage of valuable land and interconnection rights available to the Company at its former Rush Island Energy Center site that reduce the cost of the Projects as well as avoid potential scheduling delays associated with the MISO interconnection queue. With respect to the BESS project, federal tax credits including the location of the facility in an energy community that provides enhanced tax credits also support the economic feasibility of that Project. Finally, the Projects will help meet MISO's Local Clearing Requirement in Zone 5 (Missouri) and will also help alleviate tightness generally in the MISO capacity market.

**e. Tartan Factor 5: The Projects are in the Public Interest.**

**Q. Finally, turning to the last *Tartan* factor, does granting the CCN for the Big Hollow Projects promote the public interest?**

A. Yes. It is often said that the public interest test is generally satisfied if each of the first four *Tartan* factors are satisfied. Given that each of the first four *Tartan* Factors strongly support issuance of the CCNs, as discussed above, it is a logical extension to conclude that the

1 Projects are in the public interest. But just to put a finer point on the public interest question, I will  
2 reiterate the perspective that I first shared in the Boomtown case on the public interest here.

3 Generally, the public interest is served if the Company is able to effectively balance the  
4 three priorities that should be considered the pillars of the generation transition that the Company  
5 is undertaking and which is otherwise happening broadly across our industry: reliability,  
6 affordability, and sustainability.

7 These are the areas that will impact the Company's customers and communities, which are  
8 key interests the Commission's regulation of public utilities is designed to promote and protect.  
9 Consequently, they are the areas that the Company has focused on in developing its PRP. The Big  
10 Hollow Projects are a part of the Company's PRP, which is the Company's solution to optimizing  
11 across those priorities. Specifically, the Projects in this case are a key component of the PRP to  
12 help ensure reliability. And as discussed above, it is a cost-effective means of providing that  
13 reliability.

#### 14 **IV. EA-2023-0286 STIPULATION AND AGREEMENT COMPLIANCE**

15 **Q. In the Company's most recent CCN case for renewable energy facilities (File**  
16 **No. EA-2023-0286) in which it received CCNs for three solar facilities and potential approval**  
17 **of a fourth subject to certain conditions being met,<sup>6</sup> the Company committed in a Stipulation**  
18 **and Agreement ("Solar Stipulation") to provide certain information supporting future CCN**  
19 **applications filed prior to 2030. Can you please describe the information that is required of**  
20 **that Solar Stipulation provision as well as how the Company's filing satisfies those**  
21 **requirements?**

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<sup>6</sup> Those conditions were met, and the Commission granted a CCN for the fourth facility.

1           A.     Yes. The Solar Stipulation, filed with the Commission on March 5, 2024, and  
2 approved by the Commission on March 21, 2024, required the Company to provide several  
3 categories of information, including:

- 4                   1. Provide to Staff prior to the filing of a future CCN application analysis of three  
5                   alternative resource plans of Staff's choosing based on the Company's 2023 IRP,
- 6                   2. Analysis of its PRP using project specific assumptions replacing generic  
7                   resource assumptions used in its IRP,
- 8                   3. Analysis of a "do nothing" plan that assumes the requested CCN is not granted  
9                   and the Company does not pursue the project that is the subject of the  
10                  application,
- 11                  4. Testimony regarding the needs being addressed by the resource for which the  
12                  CCN is being sought,
- 13                  5. Testimony regarding any regulatory treatments implicated by the filing, and  
14                  6. Answers to ten specific questions that Staff identified in File No. EA-2023-  
15                  0286 as being relevant to the approval of a CCN application.

16           **Q.     Has the Company provided all the information required by its agreement to**  
17 **the Solar Stipulation in support of its CCN application for the Big Hollow Projects in this**  
18 **case?**

19           A.     Yes. The Company provided the analysis required in Item 1 above in advance of its  
20 Castle Bluff CCN filing in File No. EA-2024-0237 on June 6, 2024 with Staff members Busch,  
21 Luebbert, Fortson, and Graham. Consequently, that item is fully satisfied. The analyses required  
22 in Items 2 and 3 above are addressed in the Direct Testimony of witness Michels at pages 27 to  
23 29. In response to Item 4, I have described the need for the resource at a high level in my testimony

1 above, but the detailed description required by the Solar Stipulation is addressed in the Direct  
2 Testimonies of witness Ajay Arora, Matt Michels, and Andrew Meyer. For Item 5, with the  
3 passage of Senate Bill 4 earlier this year, Plant in Service Accounting ("PISA") will apply to both  
4 of the Big Hollow Projects. I will address the ten questions identified by Staff in Item 6 of the list  
5 above in the remainder of this section of my testimony.

6 **Q. 1. Does the Commission have jurisdiction over the Applicant?**

7 A. Yes. Ameren Missouri acknowledges that it is an electrical corporation and public  
8 utility subject to the Commission's jurisdiction.

9 **Q. 2. Very specifically, what authority is requested, and does the Commission**  
10 **have jurisdiction to grant the authority requested?**

11 A. The Company is requesting that the Commission grant it a Certificate of  
12 Convenience and Necessity under its authority pursuant to subsection 1 of § 393.170, RSMo., to  
13 construct, own, and operate the Big Hollow CTG plant and the Big Hollow BESS plant, which  
14 together will comprise the Big Hollow Energy Center, in Jefferson County, and requests that the  
15 Commission grant the CCN by March 26, 2026.

16 **Q. 3. Has the Applicant met all CCN rule requirements?**

17 A. Yes. The Company's Application and supporting testimony demonstrate that  
18 Ameren Missouri has met all CCN rule requirements for the Projects.

19 **Q. 4. Has the Applicant met all other filing requirements of an applicable**  
20 **Commission order or rule?**

21 A. Yes. The only requirements are those in 20 CSR 4240-20.045, the applicable  
22 provisions of which are addressed in the Company's Application, and the terms of the above-  
23 referenced approved stipulation from File No. EA-2023-0286, which are addressed herein.

1           **Q.     5. Does the Applicant have the financial ability to construct (or purchase),**  
2 **own, operate, and maintain each project?**

3           A.     Yes. See my discussion above and the Direct Testimony of Company witness Daryl  
4 Sagel.

5           **Q.     6. Does the Applicant have the operational capability to construct (or**  
6 **purchase), own, operate, and maintain each project?**

7           A.     Yes. See my discussion above and the Direct Testimonies of Company witnesses  
8 Chris Stumpf and Scott Wibbenmeyer.

9           **Q.     7. Separately for each project, is the project both important to the public**  
10 **convenience and desirable for the public welfare? Or, is the project effectively a necessity**  
11 **because the lack of the service is such an inconvenience?**

12          A.     With respect to the Big Hollow Projects, the answers to these questions are "yes"  
13 for each project, as discussed in my testimony above respecting *Tartan* Factors 1, 4 and 5, and  
14 for the reasons discussed by Company witnesses Arora, Michels, and Meyer in their Direct  
15 Testimonies.

16          **Q.     8. Separately for each project, is the project of sufficient importance to**  
17 **warrant the expense of making it? Or, is the project such an improvement as to justify or**  
18 **warrant the expense of making the improvement?**

19          A.     With respect to the Big Hollow Projects, the answers to these questions are "yes"  
20 for each, as discussed in my testimony above respecting *Tartan* Factors 1, 4 and 5, and for the  
21 reasons discussed by Company witnesses Arora, Michels, and Meyer in their Direct Testimonies.

1           **Q.     9. If applicable, are there conditions or mechanisms that can be imposed to**  
2   **overcome any deficits in the answers to the prior questions?**

3           A.     There are no deficiencies in the answers the Company has provided which need to  
4   be overcome.

5           **Q.     10. Has the Applicant presented an adequate direct case to demonstrate each**  
6   **question enumerated?**

7           A.     Yes, as demonstrated by the totality of the Company's application and supporting  
8   testimony.

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

10          A.     Yes.

In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for Permission and )  
Approval and Certificate of Public Convenience and ) File No.: EA-2025-0238  
Necessity Authorizing it to Construct a New Generation )  
Facility and Battery Energy Storage System )

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

My name is Steven M. Wills, and hereby declare on oath 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.

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