

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

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

STAFF'S REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through its undersigned attorney, and makes the following report.

1. On June 26, 2025,¹ Union Electric Company d/b/a Ameren Missouri filed an application with the Commission requesting a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain and otherwise control and manage an 800-megawatt multi-unit simple cycle natural gas electric generation facility with fuel oil backup capability at the former site of Ameren Missouri's coal-fired Rush Island Energy Center. The application seeks approval of a 400-megawatt battery storage facility also to be built on the Rush Island site. Ameren Missouri seeks a variance from the requirements of Rule 20 CSR 4240-20.045(6)(J) concerning the submission of plans for restoration of service after significant unplanned outages. Ameren Missouri seeks approval of its application by March of 2026.

2. On July 1, the Commission issued an Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to File a Pleading. Therein, the Commission

¹ All date references will be to 2025 unless otherwise stated.

set an intervention deadline of July 21 and ordered Staff to file a report no later than July 14.

3. Ameren Missouri filed eleven direct testimonies with its application. Staff has propounded an opening round of twenty data requests on Ameren Missouri with response due dates of July 21 and July 27. Staff is preparing and will circulate a proposed procedural schedule to Ameren Missouri, the Office of Public Counsel, and all intervenors. Staff anticipates that it will be able to file a proposed procedural schedule with the Commission within fifteen days after July 14 or sooner.

WHEREFORE, Staff prays that the Commission accept the Staff's Report as compliant with the Commission's Orders.

Respectively Submitted,

/s/ *Paul T. Graham*

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 10th day of July, 2025.

/s/ *Paul T. Graham*