

**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 Certificate of Public Convenience)
and Necessity for a Renewable Generation)
Facility.)
File No. EA-2025-0239

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 CSR 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 Public 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 a 250-megawatt_{AC} (“MW”)² solar generation facility to be constructed in Callaway County, Missouri (the “Reform Solar Project”), including a new 345 kV switching station (the “Odyssey Switching Station”) to which the Reform Solar Project will connect to the existing 345 kV transmission system;
- A variance from the requirement in 20 CSR 4240-20.045(3)(C) so that as-built drawings for the Reform Solar Project can be supplied after exercise of authority under the CCN

¹ All statutory references are to the Revised Statutes of Missouri (2024), unless otherwise stated.

² All references to generating capacity (MW) are to mega-watts-AC unless otherwise noted.

consistent with the condition related to as-built drawings adopted by the Commission in File No. EA-2023-0286;

- A variance from the requirement in 20 CSR 4240-20.045(6)(J) so that the Company's plans for restoration of safe and adequate service can be provided closer to the time when the Reform Solar Project will commence commercial operations also consistent with the condition relating to this requirement adopted by the Commission in File No. EA-2022-0244, EA-2022-0245, and EA-2023-0286;³
- Issuance of a Commission order granting the relief requested in this *Application* by the end of March 2026 so that the Project can be timely constructed and placed in-service by the fourth quarter of 2028 and so that the Project can take advantage of the full value of currently available federal Tax Credits and provide needed energy and renewable energy credits; 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

³ Restoration plans for the Odyssey Switching Station are provided with the Direct Testimony of Company witness Leslie M. Tindall.

of Missouri as a public utility under the jurisdiction of the Commission.⁴ 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 this 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.

⁴ Ameren Missouri is an "electrical corporation" and a "public utility" as defined in Subsections 386.020(15) and (43), RSMo (2016). According to Subsections 393.170.1 and .2, RSMo, an electrical corporation may not construct electrical plant, with the exception of an energy generation unit of one megawatt or less, without first obtaining the permission and approval of this Commission.

5. Applicant filed its 60-day notice with respect to the authority sought herein, pursuant to 20 CSR 4240-4.017(1), on March 3, 2025, and the filing was assigned the above-captioned file number.

II. REQUEST FOR A CCN FOR THE RENEWABLE GENERATION PROJECT UNDER SECTION 393.170.1

6. Applicant requests a CCN for the Reform Solar Project.

A. Project Description: Reform Solar Project

7. The Reform Solar Project is a 250 MW solar generation facility to be constructed in Callaway County, Missouri, approximately 13 miles from Fulton, Missouri, on a Project footprint of approximately 1,160 acres of agricultural land presently owned by Ameren Missouri that is adjacent to the Callaway Nuclear Energy Center. The Reform Solar Project includes an approximately 200-foot generator lead line located on the Company's property and a new 345 kilovolt switching station, the Odyssey Switching Station, which is also to be located on Ameren Missouri's property, which will connect to Ameren Missouri's existing 345kV system which runs through the Company's property.

8. Ameren Missouri will construct, install, own, operate, and maintain the Reform Solar Project. The Reform Solar Project is needed to provide reliable service to all our customers. As further explained in the direct testimonies of Ameren Missouri witnesses Ajay Arora and Matt Michels, the Company needs significant additional energy to serve its customers, starting as early as 2027. The Reform Solar Project will also provide a substantial number of Renewable Energy Credits ("RECs") expected to be needed to comply with the Missouri Renewable Energy Standard ("RES") by the year following the year in which it goes

into service, including the 1.25 multiplier for RES compliance purposes for RECS from facilities located in Missouri. The Reform Solar Project is an important component in continuing to develop a balanced supply-side portfolio to meet customer needs. Ameren Missouri expects that the Project will serve Ameren Missouri's customers and that the Reform Solar Project will be included in rate base and its prudently incurred costs will be recovered in retail rates.

9. As explained in the direct testimony of Ameren Missouri witness Scott Wibbenmeyer, the Reform Solar Project will include a solar generation plant consisting of ground-mounted, tracking photovoltaic ("PV") panels and associated facilities with a capacity of 250 MW with an estimated first-year annual energy production of approximately 530,000MW-hours ("MWh") and will be built to Ameren Missouri specifications with an expected asset life for the solar facility itself of 30 years or more.

10. The solar facility will be constructed by Ameren Missouri using an Engineering, Procurement, and Construction ("EPC") contract with its EPC partner McCarthy Building Companies, Inc. ("McCarthy"), who was selected as part of the Company's Request for Proposal ("RFP") process. The EPC contractor will be responsible for balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials. Ameren Missouri will construct the Odyssey Switching Station pursuant to its Procurement Policy and Procedure and competitive bidding, as addressed in Company witness Tindall's Direct Testimony.

11. Construction is anticipated to commence in Q2 2026 and is anticipated to be completed and placed in-service by Q4 2028.

C. The Reform Solar Project is Necessary or Convenient for the Public Service (“*Tartan* Factors”)

12. The Commission traditionally analyzes an application for a CCN⁵ 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.⁶

1. There is a need for the Reform Solar Project.

13. The Reform Solar Project is needed for several reasons. As addressed in the direct testimonies of Company witnesses Scott Wibbenmeyer, Ajay Arora, and Matt Michels, the Project is called for by the Company’s 2025 Preferred Resource Plan submitted in File No. EO-2025-0235 and part of Ameren Missouri’s long-term plan to continue to transition its generating fleet to greater reliance on least-cost renewable energy resources to fulfill its customers’ energy needs through the use of clean, zero-fuel cost generation resources, together with additional

⁵ 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).

⁶ *Id.* at 189 (*citing In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. at 561).

dispatchable generation and battery energy storage systems. Moreover, starting in 2029 – approximately six months after the Project is slated to go into service – the Company projects a need for an additional 332,000 RECs to comply with the Missouri RES if the facility were not built. Renewable energy generation is also vital to the region’s economic development, including to keep existing customers in Ameren Missouri’s service territory or to attract new or expanded loads. Renewable generation also mitigates risks associated with environmental regulation and other factors that may significantly impact the costs and benefits of coal-fired generation. The Project will also promote the public policy of this state, as recognized by the Commission, by continuing to diversify the energy supply and to gain other benefits renewable generation provides to the public. The Project will also take advantage of valuable tax credits that are currently available and provide energy and capacity in all seasons.

14. More specifically, the 250 MW of new solar generation that the Company seeks authorization for in this filing represents less than 11% of the 2,200 MW additional new renewable generation proposed to be installed by 2030, as outlined in the Company’s recent resource planning filings. As described in Company witness Matt Michels’ direct testimony, the Reform Solar Project supports the Company’s overall generation transition plan (as set out in File No. EO-2024-0020 and its new Preferred Resource Plan (see File No. EO-2025-0235), which relies on 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 fossil-fueled generation—as described more

specifically in the direct testimonies of Company witnesses Ajay Arora, Matt Michels, and Steve Wills, filed in this docket.

15. In sum, the proposed Reform Solar Project is an improvement that justifies the costs.⁷

2. The Reform Solar Project is economically feasible.

16. The Reform Solar Project is economically feasible. As outlined in greater detail in Company witnesses Matt Michels', Scott Wibbenmeyer's and Steve Wills' direct testimonies, the Reform Solar Project is economically feasible based on various indicia of economic feasibility identified by the Commission in prior CCN cases, including as demonstrated by the substantially lower net present value of revenue requirement of the Company's 2025 PRP – of which the Reform Solar Project is a part – as compared to the alternative. As discussed above and in Company witness Lansford's direct testimony, the Company is able to finance the Reform Solar Project, which is a key indicia of economic feasibility that the Commission relies on in applying this Tartan Factor.

17. Taking advantage of the tax incentives currently available under the Inflation Reduction Act of 2022 ("IRA") further contributes to the economic feasibility of the Project. Among its many impacts, the IRA extensively modifies provisions of the tax code for renewable energy projects. The IRA extends both the investment tax credit ("ITC") and production tax credit ("PTC"), creates additional wage and apprentice requirements that projects must meet to qualify for the full ITC or PTC value, and adds additional bonus credit amounts for domestic

⁷ *Id.*

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).

18. Ameren Missouri expects that the Project will be eligible for 100% production tax credit (“PTC”) or the 30% investment tax credit (“ITC”) provided in the Inflation Reduction Act of 2022. The Reform Solar Project is also expected to qualify for an additional 10% energy community tax credit bonus since the project directly adjoins a census tract with a qualifying coal-fired electric generating unit retirement. These tax credit incentives can be stacked with the 30% ITC or 100% PTC resulting in a total potential 40% ITC or a 10% increase in value of the PTC rate. Company witness Scott Wibbenmeyer discusses the Reform Solar Project's tax credit qualification in his direct testimony.

19. In addition to the above, utilizing its EPC partner McCarthy for the solar facility, Ameren Missouri will minimize risk and capitalize on the vast experience and equipment purchasing power McCarthy has amassed from years of installing more than 9.5 gigawatts of utility scale solar projects. Further, by utilizing property that the Company currently owns for the Reform Solar Project, acquisition costs for the real property necessary are avoided.

20. As described further in the direct testimony of Scott Wibbenmeyer, key equipment and construction contract execution for the solar facility were completed as part of a competitive bidding process to ensure that the Reform Solar Project's development and implementation occur at market-based pricing.

21. The Reform Solar Project also lessens the Company's need to rely on the MISO market, especially at peak times when costs are higher, a benefit of renewable generation projects that the Commission recognized in its *Report and Order* in File No. EA-2022-0245.⁸

22. Additionally, the Reform Solar Project will create jobs and tax revenues within the state and within the Company's service territory, which contribute to the Reform Solar Project's economic feasibility.

3. Ameren Missouri has the ability to finance the Reform Solar Project.

23. As Company witness Lansford discusses in his direct testimony, Ameren Missouri has the financial ability to construct the Reform Solar Project because it can access the equity and debt capital necessary to do so while maintaining strong financial metrics.

24. The base case upfront capital cost of the Reform Solar Project is estimated to be approximately *** _____ ***. As Mr. Lansford's direct testimony discusses, Ameren Missouri expects to finance the Reform Solar 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.

25. The Company's existing rate base – financed by an appropriate balance of debt and equity – exceeds \$11 billion, and its planned capital additions over the coming five years exceed \$11 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 &

⁸ *Report and Order* (April 12, 2023), File No. EA-2022-0245 at 29.

Poor's credit rating agencies, respectively. Ameren Missouri is able to finance the Reform Solar Project.

4. Ameren Missouri is qualified to construct the Reform Solar Project.

26. As explained in the Direct Testimony of Company witnesses Scott Wibbenmeyer and Leslie Tindall, Ameren Missouri is qualified to construct the 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. As the Commission itself noted in its Order granting Ameren Missouri a CCN for solar generation facilities in Audrain and Ralls Counties, Missouri, in File No. EA-2022-0244, Ameren Missouri has been in business for over 100 years and has been granted CCNs by the Commission for many projects in the past.⁹ Specific to the construction of solar generation facilities, Ameren Missouri has self-developed or otherwise constructed or acquired many utility-scale solar generation facilities, including the O'Fallon Renewable Energy Center, Lambert Community Solar Center, Montgomery County Community Solar Center, Boomtown Solar Energy Center, Huck Finn Solar Energy Center, Cass County Solar Energy Center, Vandalia Solar Energy Center, and the Bowling Green Solar Energy Center. Ameren Missouri currently operates over 500 MWs of utility-scale solar generation. In addition, the Company currently operates 700 MWs of utility-scale wind generation, including the High Prairie Wind Energy Center and the Atchison Wind Energy Center. Across all types of generation, the Company operates nearly 10 GWs of solar, wind, coal, gas, and hydroelectric resources. Regarding the switching station,

⁹ *Order Approving Stipulation and Agreement and Granting Certificates of Convenience and Necessity* (February 8, 2023), File No. EA-2022-0244, at 4.

Ameren Missouri owns and operates thousands of mile of transmission lines and the associated substations and switching stations located thereon.

5. The Reform Solar Project is in the public interest.

27. As discussed in Company witness Steven Wills' direct testimony, implementation of the Reform Solar Project promotes the public interest because in addition to the fact that it meets the first four Tartan factors, the Reform Solar 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. As earlier noted, it will also provide RECS the Company expects to need for RES compliance.

28. Even further, implementation of this Project promotes the public interest for the same reasons found to exist by the Commission when it approved a CCN for the Huck Finn, Boomtown, Split Rail, Vandalia, Bowling Green and Cass County Solar Projects in File Nos. No. EA-2022-0244, EA-2022-0245, and EA-2023-0286, respectively. These reasons include making the region more attractive to economic development, providing significant risk mitigation against the impact of additional environmental regulation, and promoting state energy policy, including the state's policy to "diversify the energy supply through the support of renewable and alternative energy sources."¹⁰

¹⁰ See, e.g., *Report and Order* (April 12, 2023), File No. EA-2022-0245, at 25.

29. Specific to economic development, availability of clean, reliable and affordable energy is an important factor in determining where businesses locate new jobs and investment. Missouri is competing with other states for new jobs and investment from businesses that have large energy demands and a need for renewable energy to meet their corporate sustainability goals. Commission approval of the Reform Solar Project will confirm for prospective large load customers that the state is supporting Ameren Missouri's obligation to serve its customers and develop the needed generation.

D. Other Filing Requirements

1. Reform Solar Project

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

a. the Reform Solar Project site, located on land Ameren Missouri owns adjacent to the Callaway Nuclear Energy Center site in Callaway County, Missouri, is depicted in and described in detail in Schedule C to this *Application* (20 CSR 4240-20.045(6)(A));

b. 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 Project site are identified in Schedule D to this *Application*;

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

(1) the scope of the solar construction project is described in Company Witness Scott Wibbenmeyer's direct testimony and the Odyssey Switching Station in the direct testimony of Company witness Tindall;

(2) existing solar project specifications and existing drawings for the Reform Solar Project can be found in Schedule SW-D1 of Company witness Scott Wibbenmeyer's direct testimony and in Schedules LT-D1 and LT-D2 of Company witness Tindall's direct testimony;

(3) the base case estimated cost of the Solar Reform Project is approximately *** _____ ***;

(4) the operational features of the Reform Solar Project once it is fully operational and used for service are discussed by Company witness Scott Wibbenmeyer's direct testimony;

d. the projected beginning of construction is expected to commence in Q2 2026 after the required permits are received, and the Reform Solar Project is expected to be placed in-service by the fourth quarter of 2028 (20 CSR 4240-20.045(6)(D));

e. The Reform Solar Project has no common plant to be included in the construction project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing the Reform Solar Project are discussed in the direct testimony of Company witness Mitchell Lansford (20 CSR 4240-20.045(6)(F));

g. the Reform Solar Project is contemplated by the Company's 2025 Preferred Resource Plan as explained in the direct testimony of Company witness Matt Michels (20 CSR 4240-20.045(6)(G));

h. as explained in the direct testimony of Company witness Scott Wibbenmeyer, Ameren Missouri utilized a competitive bidding process to select the EPC Contractor and related equipment for the solar facility. The EPC contractor will be responsible for the balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials (20 CSR 4240-20.045(6)(H). With respect to the switching station, Ameren Missouri will use a combination of procurement under its Procurement Policy and Procedures and competitive bidding;

i. the Reform Solar Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation and switching stations are operated, including its existing renewable generation and the associated interconnections. More specifically, the Reform Solar Project will be operated by Ameren Missouri, with the operation of the solar facility managed by the Ameren Missouri Energy Management & Trading group, similar to the Company's other large-scale renewable generators such as the Atchison County and High Prairie Wind Energy Centers and Boomtown, Huck Finn, and Cass County Solar Energy Centers. Ameren Missouri will coordinate all operations of the solar facility with the Mid-Continent Independent System Operator (MISO), of which Ameren Missouri is a member. The

switching station will be operated in the same manner and fashion as other Ameren Missouri stations, as outlined in Company witness Tindall's direct testimony (20 CSR 4240-20.045(6)(I));

j. With respect to the solar facility, Ameren Missouri requests a 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 ninety (90) days prior to the time that the Reform Solar Project is placed in-service, consistent with the Commission's most recent CCN order for Ameren Missouri; 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 is the owner of all the land on which the project is planned.

31. Per the Third Stipulation and Agreement filed in File No. EA-2019-0021, Ameren Missouri is providing in its workpapers a transmission capital cost and capacity factor sensitivity analyses, including a "worst-case" scenario, since this *Application* concerns a wind or solar project interconnected at the transmission level.

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

a. has provided by email from Matt Michels to Staff the analyses required by subsections i. and ii;

b. through the direct testimonies of Steve Wills, Matt Michels, and Ajay Arora, is providing testimony regarding what needs the Reform Solar 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, is outlining what regulatory treatments, if any, are 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.

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

- Granting a CCN, pursuant to Section 393.170.1, authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Reform Solar Project in Callaway County, Missouri;
- Granting the Company variances from the requirement in 20 CSR 4240-20.045(6)(J) respecting the solar facility allowing the Company to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time when the Reform Solar Project will be placed in-service;
- Granting the Company variances from the requirement in 20 CSR 4240-20.045(3)(C) so that as-built drawings for the Reform Solar Project can be supplied after exercise of

authority under the CCN consistent with the condition related to as-built drawings adopted by the Commission in File No. EA-2023-0286;

- Issuance of a Commission order granting the relief requested in this *Application* by the end of March 2026; and
- For such other and further relief, findings, or orders that the Commission believes just, reasonable, and in the public interest.

Respectfully submitted,

/s/ Jennifer L. Hernandez

Jennifer L. Hernandez, MO Bar #59814
Corporate Counsel

Jennifer S. Moore, MO Bar #75056
Senior Corporate Counsel

Wendy K. Tatro, Mo Bar #60261
Director and Assistant General Counsel
Ameren Missouri

1901 Chouteau Avenue
St. Louis, MO 63103

Telephone: (314) 554-3484

Facsimile: (314) 554-4014

E-Mail: AmerenMOService@ameren.com

James B. Lowery, Mo. Bar #40503

JBL LAW, LLC

9020 S. Barry Rd.

Columbia, MO 65201

Telephone: (573) 476-0050

E-mail: lowery@jblawllc.com

E-mail: tripp@jblawllc.com

**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

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 a true and correct copy of the foregoing was served on counsel for all parties of record via electronic mail on this 29th day of August 2025.

/s/ Jennifer L. Hernandez



State of Missouri

John R. Ashcroft Secretary of State

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

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

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

STATE OF MISSOURI



Denny Hoskins
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

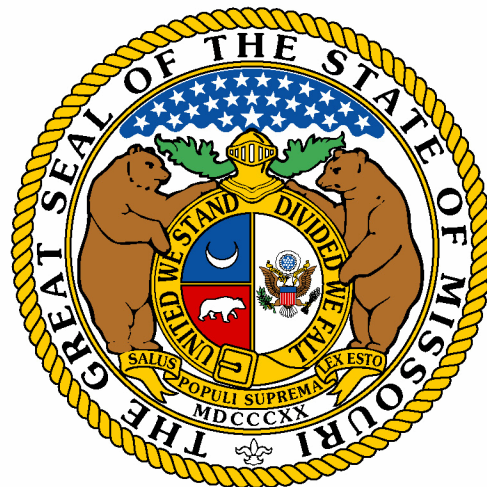
I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

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

EA-2025-0239

Schedule C is
Confidential
in its Entirety

P

List of utilities crossed:

<u>Company</u>	<u>Utility</u>	<u>ALTA Notes</u>	<u>Email (if available)</u>
Union Electric	Electric & Fiber Optic	Note 11, BK147 PG207	
Central Electric Power Cooperative	Electric	BK243 PG30	
Callaway County	Roads	Note 12, 16	
State Roads Right of Way	Roads	Note 13	
Others	Cemetary	Note 14	
Callaway County	Water	Note 15, BK243 PG913	
Kingdom Telephone	Phone & Fiber	18	
Callaway Electric Cooperative	Electric & Fiber Optic	19, 32	
Gateway		20	
Reservation		21	
Upper & Lower Riparian Owners	Creek	22-27	
Landfill		30	