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Witness: Scott Wibbenmeyer
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Sponsoring Party: Union Electric Company
File No.: EA-2025-0239
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MISSOURI PUBLIC SERVICE COMMISSION

File No. EA-2025-0239

DIRECT TESTIMONY

OF

SCOTT WIBBENMEYER

ON

BEHALF OF

UNION ELECTRIC COMPANY,

d/b/a Ameren Missouri

St. Louis, Missouri
August 2025

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Scott Wibbenmeyer. My business address is 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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 Missouri", or "Company") as Senior Director, Renewable Business Development and Acquisitions.

Q. Please describe your educational background and employment experience.

A. I hold a Bachelor of Science in Mechanical Engineering from the University of Missouri – Columbia. I also hold a Master of Business Administration from the University of Missouri – St. Louis. I joined Ameren Missouri in 1999. In my roles since first joining Ameren 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 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 transferred to the renewable development organization, where I led development teams for biomass, wind, and solar for Ameren Missouri. In 2015, I transitioned to Insurance Risk Management where I was responsible for managing financial risk and insurance portfolios. In 2019, I returned to 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 storage generation projects in support of three primary goals: (a) to support Ameren Missouri's balanced generation portfolio of both dispatchable and renewable energy resources by implementing the renewable and energy storage components of the portfolio, which will allow Ameren Missouri to maintain the reliable, resilient, and affordable generation portfolio we need to serve our customers,; (b) to comply with the Missouri Renewable Energy Standard and (c) to support the development of customer renewable energy solutions such as the Company's Community Solar Program and the Renewable Solutions Program.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Direct Testimony?

A. The purpose of my Direct Testimony is to support the Company's Application for a Certificate of Convenience and Necessity ("CCN") for a solar generation project (the "Project" or "Reform Solar Project"), that Ameren Missouri is developing to meet its need to supply low-cost energy to its customers as part of its balanced supply-side portfolio consisting of dispatchable, renewable, and low-carbon generation resources. The 250 megawatts$_{AC}$[1] ("MW") of new solar generation for which the Company seeks authorization in this proceeding represents approximately 3% of the 8700 MW of all new generation (solar, wind, gas combined cycle and gas simple cycle) proposed to be installed by 2032, as outlined in the Company's recently submitted 2025 Preferred Resource Plan ("PRP") (see File No. EO-2025-0235).

I will briefly address how this Project fits into the Company's generation portfolio, which was addressed in detail in its PRP filing in File No. EO-2025-0235 and further addressed in

[1] All references to solar capacity are expressed in alternating current capacity, unless otherwise specified.

additional detail in the Direct Testimonies of Company witnesses Ajay K. Arora, Matt Michels, and Steve Wills filed in this docket. In addition, I will also provide a description of the proposed Reform Solar Project, discuss its characteristics, the reason for its location, the Project schedule, the engineering, procurement, and construction plans, and finally discuss the tax and economic benefits of the Project.

Q. Are you sponsoring any schedules?

A. Yes. I am sponsoring the Project contracts, executive summary of the engineering construction and procurement ("EPC") contract, and the technical specifications, as listed in the Table 1 below.

Table 1. Schedules

Document	Number
Executed EPC Contract	SW-D1
Permitting Matrix	SW-D2
In-service Criteria	SW-D3

III. THE REFORM SOLAR PROJECT

Q. Please describe the Reform Solar Project in greater detail.

A. The Reform Solar Project is a ground-mounted, single-axis tracking photovoltaic solar generation plant and associated facilities with a capacity of approximately 250 MW. Its estimated annual production of energy is approximately 530,000 mega-watt hours ("MWh"). The Project will be located in Callaway County, Missouri, on approximately 1160 acres presently owned by Ameren Missouri adjacent to the Callaway Nuclear Energy Center. It will include an approximately 200-foot generator lead line located on the Company's property that will interconnect to Ameren Missouri's existing 345 kilovolt ("kV") transmission system at a to-be-constructed 345 kV switching station, to be known as the Odyssey Switching Station, which is

also to be located on Ameren Missouri's property. Like other Ameren Missouri switching stations, Odyssey will be monitored by the Company's supervisory control and data acquisition system. Company witness Leslie Tindall addresses the details of the switching station in her Direct Testimony.

Q. How will Ameren Missouri develop the Reform Solar Project?

A. The Reform Solar Project was developed by Ameren Missouri in a manner similar to many of its other generation projects, including existing non-renewable generation plants and other solar projects. These projects include the Vandalia Renewable Energy Center, Bowling Green Renewable Energy Center, O'Fallon Renewable Energy Center, Montgomery Community Solar Center, and the Lambert Community Solar Center, among others. The Reform Solar Project is a self-build initiative, constructed in accordance with the Company's "Exhibit 1: Owner's Specification" as detailed in the EPC contract attached to my testimony as Highly Confidential Schedule SW-D1 with McCarthy Building Companies ("McCarthy").

Q. Why did the Company select the property near the Callaway Nuclear Energy Center as the site for construction of the Reform Solar Project?

A. The Reform site was first identified as a potential location for additional solar generation during a 2020 evaluation for the existing Montgomery County Community Solar Center, previously approved in Case EA-2020-0371. As part of this process, the Company evaluated the feasibility of locating solar facilities on available Ameren Missouri property, including at the Callaway Nuclear Energy Center. The initial screening phase indicated that the Reform site offers exceptional value due to its favorable site attributes. The terrain is well-suited for solar, requiring minimal grading and site preparation. The site is located in a remote area away from the local population and has terrain, specifically existing tree lines, that limits the visibility

of the site from the local community. The site has limited permitting requirements, making for a more efficient path to construction. The property is outside of a floodplain, reducing environmental and permitting risks, allowing for a more efficient path to construction. And finally, the site is already owned by the Company, eliminating lease or additional land expenses.

During the 2020 evaluation, it was noted that the site was not well-suited for connecting to the distribution system due to a lack of sub-transmission infrastructure in the area. However, the results suggested that the Reform site could be a great location for future transmission-level solar generation development. Based on this evaluation, Ameren Missouri filed an interconnection application into the 2020 Midcontinental Independent System Operator ("MISO") generator interconnection study cycle to begin the process of securing transmission interconnection rights for future solar development.

Since the 2020 evaluation, the benefits of the Project have continued to grow. In 2025, the Project received the interconnection study results from MISO, which establish the transmission network upgrades, interconnections costs and affected systems transmission costs necessary for the Project to interconnect to the transmission system. These costs are included in the Project base costs estimate discussed later in my testimony. The Company is currently negotiating the generator interconnection agreement, which will further secure transmission rights for the Project to deliver energy to Ameren Missouri customers. The details of that agreement are discussed in witness Tindall's testimony.

Additionally, with the passage of the Inflation Reduction Act ("IRA") in 2022, the Project is now eligible for an additional 10% "energy community" tax credit bonus.[2] The Reform site

[2] As I discuss later in my Direct Testimony, we expect the Project to continue to qualify for federal tax credits under recent legislation and U.S. Treasury guidance.

offers exceptional value due to its favorable site attributes and currently available federal tax incentives. The terrain is well-suited for solar requiring minimal grading and site preparation. The property is outside of a floodplain, reducing environmental and permitting risks, and it is already owned by the Company, eliminating lease expenses. Furthermore, because the site is located in an energy community, it is expected to receive enhanced tax benefits beyond the 30% Investment Tax Credit ("ITC").

Q. Will the Reform Solar Project reduce future generation expansion options near the Callaway Nuclear Energy Center?

A. No, the Reform Solar Project is utilizing a small portion of the land adjacent to the Callaway Energy Center. The design ensures the solar panels are placed at a significant distance from the existing Callaway Energy Center and its surrounding facilities, so as not to impact its operations. Additionally, thousands of acres of land owned by Ameren Missouri will remain open to the public for hunting and other outdoor activities within the Reform Conservation Area. Moreover, the solar site has been designed to ensure sufficient land remains for potential Callaway facility expansions or other projects that may be needed to meet Ameren Missouri's future energy and capacity needs, such as a new nuclear facility and a battery energy storage system. The solar facility not only ensures that future generation options remain open, but it could also support future expansions. This is because it includes the installation of a new large interconnecting substation and transmission network upgrades, both of which could facilitate the installation of additional facilities in the area.

Q. Please outline the basic contractual arrangements between Ameren Missouri and the EPC contractor for the Reform Solar Project.

A. The EPC contractor will be responsible for engineering, procurement and construction of the facility. To avoid contractor mark-up of key equipment, Ameren Missouri will be responsible for acquiring some of the long lead time materials, specifically, the solar modules, breakers, and main step-up transformers. The complete EPC contract is attached to my testimony as Highly Confidential Schedule SW-D1.

Q. How was the EPC contractor selected?

A. The Company performed a competitive bid process for the EPC contract. For this Project, the Company issued a Request for Proposal ("RFP") to a select list of bidders. This list was generated based on firms with which Ameren Missouri has experience, either with prior bid processes or in directly working for Ameren Missouri on earlier projects. More specifically, the contractor list was developed based on the following criteria:

- Firms that have successfully completed other solar projects.
- Firms that have expressed a desire to bid.
- Firms that have extensive engineering, construction or solar manufacturing experience.

Based on the criteria, five bidders were selected to receive the RFP. Of those selected, four bidders submitted a response to the RFP. Ameren Missouri then evaluated each bidder's response in a consistent and objective manner using responses to questions or requirements identified in the RFP as the basis of the evaluation.

Q. Please describe the evaluation process utilized to score the RFP responses.

A. The Company developed an RFP scorecard matrix to evaluate the submittals. 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, engineering design, safety record, project plan, project team and staff, past performance and references, project

schedule, commercial terms and conditions of contract, and price and proposed percent mark-ups. After completing the RFP evaluation matrix, Ameren Missouri engaged in negotiations with the top vendors to clarify bids and finalize commercial terms. McCarthy Building Companies, Inc. ("McCarthy") emerged as the top choice, offering the highest score, best value, and most comprehensive bid. Consequently, Ameren Missouri awarded McCarthy the EPC contract for the Reform Project, as their proposal best met the overall contract and project requirements.

Q. Can you outline the key terms under the EPC with McCarthy?

A. Key terms are as follows:

- McCarthy is responsible for engineering and design of the Project. Ameren Missouri has review and approval rights over the design.
- McCarthy is responsible for the procurement of all materials except for Company supplied main power transformers, high voltage breakers and solar panels.
- Key terms obligate McCarthy to meet prevailing wage and apprenticeship requirements to allow the project to qualify for investment tax credits.
- Ameren Missouri will be responsible for the interconnection to the 345-kV transmission system under the terms of the generator interconnection agreement ("GIA"). There are four key milestones that underpin the structure of the contract: Limited Notice to Proceed, Full Notice to Proceed, Substantial Completion, and Final Completion.
    - "Limited Notice to Proceed" or "LNTP" means a Purchase Order issued by Ameren Missouri to McCarthy authorizing a specific portion of the work to begin, but not the work in its entirety. The LNTP to complete the Projects engineering and design occurred in March 2025.

- "Full Notice to Proceed" or "FNTP" means the Purchase Order issued by Ameren Missouri to McCarthy to perform the entire scope of work, or, if applicable, the remaining portions of the work not previously authorized in a Limited Notice to Proceed. The Company expects the FNTP to be issued on or before April 1, 2026
- Upon installation of the Project's components, interconnection being available, and successful attainment of capacity testing requirements, the contractor will have achieved "Substantial Completion," and the project will be In-Service.[3] The schedule for the Reform Solar Project anticipates Substantial Completion occurring in October 2028. If a delay occurs, the Company will begin collecting liquidated damages.

Q. You noted that the EPC contract price is not yet fixed. Can you estimate what the EPC contract price will be?

A. The Company and McCarthy entered into the EPC contract in June 2024, with the expectation that construction would commence in March 2025. Based on these dates, a contract price of ***_____*** was agreed upon. However, rapid and significant changes discussed in the Company's 2025 PRP filing necessitated a reassessment of resource needs, leading Ameren Missouri to postpone the advancement of the Reform Solar Project. This delay pushed the expected construction start date beyond the originally planned date in the McCarthy contract. Consequently, this postponement, along with changes in market conditions, is anticipated to affect the contract price. Although the current EPC price will not be fixed until shortly before

[3] Capitalized terms used here are defined in the EPC contract.

construction begins, the final EPC price is not expected to increase the total project cost estimates provided below. These estimates are based on similar past projects, industry trends, and prior pricing efforts specific to the Reform Solar Project. The total project cost estimate includes a contingency to accommodate this range.

Q. What do you estimate the total Project costs to be, including the EPC contract?

A. The Company expects to receive an updated cost estimate from the EPC once they reach 60% design. We expect this to occur in the first quarter of 2026, prior to issuing FNTP. The costs will not be fixed until the Project nears construction start, following the receipt of the CCN. To account for any fluctuation in costs, a base case Project cost estimate, of ***_____*** and a risk-adjusted estimate of ***_____*** has been developed, which includes cost for both the solar project and interconnection and network upgrades. Several of the risks that drive the risk-adjusted cost estimate are identified and discussed later in my testimony, and overall project economic modeling and results are presented in the Direct Testimony of Company witness Michels.

Q. What is the overall status of developing the Project?

A. Many of the development activities are completed, including:

- All necessary land for the project is presently owned by the Company, ensuring the project footprint is secured and prepared for construction activities upon receipt of the CCN;
- The EPC contractor has been selected;
- The main power transformer, breaker, and module suppliers have been selected;
- The last of the MISO Definitive Planning Phase ("DPP") interconnection studies, DPP 3, has been completed;

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- All required environmental studies have been completed and any environmental impacts have been proactively identified and mitigated;
- Standard engineering studies including geotechnical, hydrology, and structural assessments have been completed. These studies confirm the feasibility and technical readiness of the site for development.
- McCarthy has achieved 30% engineering design and provided the Company with a PVsyst Report.[4]
- The Callaway County Commission has confirmed that the County has not adopted planning or zoning regulations. Similarly, the County has stated that no build permits are required. However, there are standard non-County construction permits that the Company expects to obtain prior to construction. The Project permitting matrix is attached as Schedule SW-D2. The permitting matrix attached includes the standard local, state, and federal permits and approvals that the Reform Solar Project expects to receive as part of development and construction.

Q. Has Ameren Missouri identified potential risks to the Reform Solar Project?

A. Yes, all projects carry risks, and that is true for the Reform Solar Project. The identified risks for the Project are related to procurement/construction, change in law/tariffs and interconnection.

Q. Has the Company put plans in place to mitigate these risks?

[4] PVsyst is a solar design software that creates, simulates, and analyzes solar energy systems of all types. PVsyst is commonly used for conducting solar resource assessments as it helps to analyze the potential solar energy production at a specific location by simulating the performance of photovoltaic (PV) systems based on various input parameters such as weather data, system configuration, shading effects, and geographical location.

A. Yes. The Company has leveraged its own buying power, maintained favorable contract terms, partnered with a highly qualified EPC contractor and completed MISO interconnection studies to ensure Project risks are reduced or eliminated.

As mentioned previously, the Reform Solar Project utilized a competitive RFP to select McCarthy as its EPC contractor. This will allow the Project to utilize McCarthy's procurement expertise to supply key equipment and resources such as inverters, racking, trackers and construction labor. Furthermore, Ameren Missouri has executed contracts to supply the main transformers, 345k KV breakers and solar modules, all of which will help manage the price and delivery risks of these long lead items.

As for tariff risks, the U.S. Department of Commerce has and is expected to continue to launch anti-dumping circumvention investigations of solar panel modules and components being imported into the United States. In addition, the Trump administration has announced several tariffs on equipment and materials. To help manage the primary tariff exposure for the Project, the Company has entered into a supply agreement for solar modules that will be assembled in the United States. The supply agreement also includes provisions that relieve Ameren Missouri of any currently announced tariffs as of the signing of the agreement.

Regarding interconnection risks, the MISO generator interconnection process has prolonged renewable development and created delays now averaging 4-5 years. Such delays can have significant impacts on project schedules and costs. For example, if the transmission interconnection studies are delayed, this in turn causes uncertainty in the ability to interconnect the project and in the cost associated with the interconnection, delaying equipment procurement and preventing cost certainty. However, the Reform Solar Project entered the MISO queue in 2020 and has completed the MISO interconnection study process and has known network upgrades.

The GIA presently under negotiations will authorize the Project to interconnect to the MISO transmission system and will have full Energy Resource Interconnection Services and Network Resource Interconnection Service upon completion of the necessary transmission system upgrades. Having the MISO study results along with a near complete GIA provides certainty on interconnection costs and schedules thereby reducing the transmission interconnection risks for the Project.

Q. Is Ameren Missouri qualified to construct and operate the Project?

A. Yes. Ameren Missouri is a well-established electric utility with extensive experience in constructing and operating various types of generation projects, including solar. The company currently manages a diverse portfolio that includes thirteen solar facilities, twelve simple cycle combustion turbine facilities, two wind facilities, two coal-fired centers, three hydro-electric sites, and one nuclear power energy center. With its financial, technical, and management expertise developed over many years, Ameren Missouri is well-qualified to construct and operate the Project.

IV. TAX CREDITS AND TAX STRATEGY

Q. Does the Company expect the Project will qualify for any federal tax incentives?

A. Yes.

Q. For which federal tax incentives does Ameren Missouri expect the Project to qualify?

A. In August 2022, the IRA became federal law. Among its many impacts, the IRA extensively modified provisions of the tax code for renewable energy projects. The IRA extended both the investment tax credit ("ITC") and production tax credit ("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 solar projects to utilize the PTC or 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 solar project such as the Reform Solar Project.

Ameren Missouri's current expectation is that the Reform Project will be eligible for the PTC or 30% ITC, giving Ameren Missouri the choice of which credit to utilize. In addition, we anticipate the project will qualify for additional bonus tax credits discussed below.

Q. What additional bonus credits do you expect to apply to the Project?

A. The Reform Solar Project is 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.

Q. What tax strategy do you expect the Company to pursue for the Project?

A. Because it is expected to provide the most value for our customers, we expect use of the 40% ITC available for the Reform Solar Project. That expectation is based on an economic analysis under both the PTC and ITC scenarios, which supports use of the ITC. While our base financial model assumes qualification for the ITC, we will remain flexible and will ultimately pursue the approach that delivers the greatest value to Missouri customers, including by re-

evaluating our current expectation to use the 40% ITC close to the time when the tax credit election must be made, which will occur closer to the anticipated in-service date of the Project.

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

A. The ITC associated with the Reform Project will directly benefit customers, translating into lower rates or avoided cost increases as compared to the impact of the project absent the tax credits. The savings generated by these tax credits are factored into the rate-making process as they will be captured in the IRA tracker agreed upon and approved by the Commission in File No. ER-2022-0337, ensuring that the financial benefits flow directly to Ameren Missouri customers in the form of reduced rates over the life of the assets.

Q. You indicated you expect the Project to qualify for the 40% ITC. Does that remain true given the recently-passed One Big Beautiful Bill Act?

A. Yes. As background, on July 4, 2025, President Trump signed into law the One Big Beautiful Bill Act ("OBBBA"). The OBBBA included several modifications to Section 48E and 45Y, including setting new deadlines for clean energy projects to qualify for tax credits, adjustments to the domestic content requirements, and the introduction of Foreign Entity of Concern ("FEOC") restrictions. Under the OBBBA, solar facilities must have begun construction[5] by July 4, 2026, to be eligible for the tax credits if placed in service after December 31, 2027. For facilities that began construction on or before July 4, 2026, they would qualify for the tax credits if they are placed in service within four years of their start of construction date, for example, should a project have begun construction in 2025, it would need to be placed in service by the end of

[5] See discussion of the Physical Work Test, below, for what constitutes "construction" for purposes of qualifying for the tax credits.

2029. As for the FEOC restriction, they do not apply to projects that have begun construction prior to January 1, 2026.

On July 7, 2025, President Trump issued an executive order titled "Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources," which directed the Treasury Department to issue guidance for purposes of determining whether a wind or solar project has started construction or is subject to the December 31, 2027, completion deadline. Prior to the order, the parameters for starting construction were well established and subject to numerous Treasury Department Notices.

On August 15, 2025, the Treasury Department issued new guidance under Notice 2025-42 in response to the executive order. The new guidance requires wind and solar projects with a maximum net output of greater than 1.5 MW to perform physical work of a significant nature (also known as "Physical Work Test") to qualify the project as having started construction and then meet a continuity safe harbor test. The continuity safe harbor test requires a project to be placed in service within four years after the end of the year in which construction starts, or if the project is placed in service past the four-year period, then the taxpayer must demonstrate that construction has been continuous based on facts and circumstances. The new guidance will apply to projects that have not begun construction by September 2, 2025. Projects may continue to rely on previous IRS guidance to establish the beginning of construction before September 2, 2025. However, as it relates to the Physical Work Test, the new guidance is fundamentally unchanged as compared to previous IRS guidance.

Q. Will the Project begin construction prior to July 4, 2026?

A. Yes, under the current IRS "beginning of construction" rules for the ITC, a solar project can qualify by starting physical work of a significant nature ("Physical Work

Test"). Installing or starting construction of major equipment and its components pursuant to a binding contract, such as a transformer conservator tank, meets the Physical Work Test if the work is performed on property that is an integral part of the energy property. Since a conservator tank is a necessary component of the project's main step-up transformer, its manufacture, assembly or on-site installation demonstrates that physical work of a significant nature has begun. Once this qualifying activity is completed, the project locks in the ITC percentage in the year of construction is deemed to have begun, provided continued progress is maintained toward completion and completion occurs within 4 years of the start of construction.

The Reform Solar Project completed construction of the main step transformer conservator tank and radiators on August 16, 2025. For this reason, the Reform project has begun work of a physical nature as defined by the IRS prior to the OBBBA deadline of July 4, 2026, and therefore has until December 31, 2029, to be placed in service and qualify for the tax credits. Furthermore, the Reform project will not be subject to IRS Notice 2025-42 or FEOC restrictions, since fabrication of the transformer has started prior to the effective dates of each.

Q. Are there any additional bonus tax credits beyond the base 30% ITC and 10% energy community bonus the Reform Project could qualify for?

A. Yes, projects that meet certain domestic equipment supply arrangements can qualify for an additional 10% ITC on top of the 30% ITC and the 10% "energy community" bonus discussed earlier. For the Project to qualify, all structural steel used in the project (such as rebar, piles, tracker torque tubes, etc.) must be domestically manufactured. Additionally, the project must meet a Domestic Cost Percentage Threshold, meaning that manufactured products (like solar modules, inverters, transformers, etc.) used for the Project must account for 45% of the total project costs, based on a begin construction year of 2025 such as that of the Reform Project. Currently,

not all equipment supply agreements have been issued for the Project, and due to the uncertainty and risks related to equipment supply, the 10% domestic content bonus is not guaranteed. However, the Company has initial commitments from the module manufacturer to supply modules that meet the domestic requirements for the Project. Furthermore, discussions are underway with the EPC contractor to pursue options for the Project to meet the domestic supply requirements. Specifically, the Company expects the EPC contractor to pursue an all-structural steel option for racking and other necessary equipment. These options will be pursued as the Project approaches final design, and the EPC contractor pursues subcontract and supply agreements before the notice to proceed for construction.

V. ECONOMIC DEVELOPMENT & COMMUNITY BENEFITS

Q. Does the Reform Solar Project represent an economic development opportunity for the State of Missouri?

A. Yes, the economic impact of the Reform Solar Project on the state and region will be significant and positive.

Q. On what do you base your contention that the Reform Solar Project will have a significant and positive impact on the State of Missouri?

A. The Project will generate significant economic benefits, including the creation of construction jobs during the build-out phase, permanent operations and maintenance jobs once the Project is in-service, and ongoing contributions to local communities through property taxes or payments in lieu of taxes. More specially, it is anticipated that the Project will provide over 300 high-quality construction jobs at peak construction. Callaway County will benefit from more than ***_____*** in property taxes or payments made in lieu of taxes over the life of the

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projects, much of which will directly benefit local schools, emergency programs and other county initiatives.

In addition to these direct economic benefits, indirect benefits will be realized throughout Project construction by restaurants, gas stations, hotels, stores and other businesses in the vicinity of the Reform Solar Project. And as Company witness Wills notes, increasing the Company's portfolio of renewable energy resources will continue to assist in attracting or retaining commercial and industrial customer loads given the importance of renewable energy to those customers. The benefits will be felt throughout the state of Missouri.

Q. You mention PILOT payments. Is the Company considering entering into a Chapter 100 Agreement with the County for the Reform Solar Project?

A. Yes, consistent with other Company generation, including its Peno Creek and Audrain gas-fired generation and its Huck Finn and Vandalia solar facility, the Company intends to prudently pursue Chapter 100 financing arrangements with Callaway County for the Reform Solar Project. Chapter 100 arrangements allow project owners to implement PILOT arrangements instead of paying property taxes otherwise called for by state law, to the benefit of customers and Callaway County. The PILOT arrangements offer a unique "Win-Win" scenario for customers of a regulated utility and Missouri counties, since they are designed to result in net PILOT payments greater than the county would receive otherwise under state tax law, while also reducing the overall net property tax required for the project. A Chapter 100 structure can create additional revenue for counties hosting the Project, while also bringing net property tax savings to customers.

VI. OTHER FILING REQUIREMENTS

Q. Are you requesting any variances to the application requirements as part of your testimony?

A. Yes. Ameren Missouri seeks a variance of 20 CSR 4240-20.045(3)(C) and 20 CSR 4240-20.045(6)((J).

Q. When will the as-built drawings be provided?

A. The Company will provide the as-built drawings within 100 days after the Final Completion Date, as defined in the applicable EPC agreement for the Project. While high-level design layouts can be found in Schedule C to the Application, the as-built drawings can only be provided once construction is completed. The as-built drawing will include site, racking, and electrical plans. This approach is consistent with the Commission's recent CCN approvals in File Nos. EA-2023-0286 and EA-2024-0237.

Q. Is Ameren Missouri seeking a variance to submit plans for the restoration of safe and adequate service for the Project?

A. Yes. Consistent with the Commission's Orders in Case No. EA-2023-0286 and EA-2024-0237, the Company requests to provide the Project plans for restoration of safe and adequate service within 90 days' post commercial operation of the Project. Plans for restoration of safe and adequate service will not be complete until final equipment selection, installation, and discussions between Ameren Missouri operations personnel and the Project's contractors and equipment suppliers take place.

Q. What are the proposed in-service criteria for the facility?

A. The Company is requesting to utilize the In-service Criteria approved by the Commission in File No. EA-2023-0286 for the solar facilities approved in that case. I have attached the criteria to my Direct Testimony as Schedule SW-D3.

VII. CONCLUSION

Q. Does this complete your Direct Testimony?

A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and Certificates of Public Convenience and Necessity Authorizing it to Construct Renewable Generation Facilities.	)))))	File No.: EA-2025-0239

AFFIDAVIT OF SCOTT WIBBENMEYER

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

Scott Wibbenmeyer, being first duly sworn on his oath, states:

My name is Scott Wibbenmeyer, 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.

Scott Wibbenmeyer

Sworn to me this 29th day of August, 2025.