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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EO-2025-0154

REBUTTAL TESTIMONY

OF

ROBERT B. DIXON

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
September, 2025**

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SURREBUTTAL TESTIMONY

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I. INTRODUCTION

1
2 **Q. Please state your name and business address.**

3 A. Robert B. Dixon, Union Electric Company d/b/a Ameren Missouri ("Ameren
4 Missouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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

6 A. I am employed by Ameren Missouri as Senior Director, Economic, Community and
7 Business Development. In my current position, my primary duties and responsibilities include
8 leadership and execution of strategy in Ameren Missouri's economic, community, and business
9 development efforts. In economic development, Ameren Missouri assists existing customers and
10 prospective new customers that are considering new or expanded operations in our service
11 territory. We work alongside state, regional, and local economic development officials to compete
12 with other locations around the country for new jobs and capital investment in the communities
13 we serve. Our community relations team serves as the primary point of contact for county and
14 municipal governments to assist them with a variety of issues.

15 **Q. Please describe your education, experience, and employment history.**

16 A. My career has focused on driving economic growth in Missouri by advancing
17 efforts in economic, community, workforce, and infrastructure development. In October 2021, I
18 became Ameren Missouri's Director of Economic and Community Development, leading our

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1 coworkers and strategy in these areas to serve our customers and communities. Prior to joining
2 Ameren Missouri, I served as the Director of the Missouri Department of Economic Development
3 ("DED") from July 2017 until October 2021. As a Senate-confirmed member of the Governor's
4 cabinet, I was responsible for leading the state agency that oversaw economic and community
5 development, portions of the state's workforce development, and tourism, among other areas.
6 During the Covid-19 pandemic, I helped lead the state's economic recovery efforts and other
7 initiatives.

8 During my time as DED Director, I led one of the largest reorganizations in Missouri state
9 government history to bring renewed focus on Missouri's economic development efforts. During
10 this period, DED helped bring approximately 3,000 economic, community, and workforce
11 development projects to fruition, securing approximately \$5 billion in major investments and the
12 creation or retention of more than 26,000 jobs in Missouri. Three of the most prominent projects
13 that were initiated and announced during my tenure include the General Motors plant expansion
14 in Wentzville, the Nucor Steel mill in Sedalia, and the U. S. Department of Agriculture agency
15 relocations to Kansas City.

16 Prior to joining the DED, I served as the President and CEO of the Missouri Community
17 College Association, a professional association of Missouri's 12 community colleges, and in
18 various leadership roles at the Springfield and Hollister, Missouri Chambers of Commerce. In my
19 roles at these chambers of commerce, I was responsible for driving economic development in the
20 local community, and I worked with numerous other communities in the Southwest Missouri
21 region to do so.

22 I am a U.S. Marine Corps veteran, who served in Afghanistan immediately after the 9/11
23 terrorist attacks. I was honorably discharged as a Sergeant after five years of service in 2003. I

1 earned a Bachelor of Arts in Political Science from the University of Missouri – St. Louis and a
2 Master's Degree in Public Administration from Missouri State University.

3 **Q. Have you previously testified in a proceeding at the Missouri Public Service**
4 **Commission or before any other utility regulatory agency?**

5 A. Yes. I have served as a witness on behalf of Ameren Missouri in previous
6 proceedings before the Missouri Public Service Commission.

7 **II. PURPOSE AND SUMMARY OF TESTIMONY**

8 **Q. What is the purpose of your surrebuttal testimony in this proceeding?**

9 A. The purpose of my surrebuttal testimony is to provide additional context on the
10 economic development implications for the state of Missouri as a result of these proceedings. My
11 testimony will address the following two points:

- 12 1. Specific economic development considerations regarding various positions taken in this
13 case, and
- 14 2. A review of the widespread support for economic development by Missouri's leaders,
15 including the Governor and General Assembly, who have passed and enacted laws
16 specifically to make Missouri more competitive and win economic development.

17 **III. ECONOMIC DEVELOPMENT CONSIDERATIONS**

18 **Q. In their surrebuttal testimony, Ameren Missouri witnesses, Ajay Arora and**
19 **Steve Wills point out why Staff's proposed tariff is likely to severely hamper Missouri's**
20 **ability to successfully attract large businesses. Does that concern you as an economic**
21 **development professional?**

22 A. Yes, it does concern me, greatly. Based upon Messrs. Arora's and Wills' Surrebuttal
23 Testimony, it appears that Staff is advocating for the creation of terms of service for large load

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1 customers that will likely severely hamper Missouri's chances to gain new economic development.
2 As Mr. Wills discusses in his Surrebuttal Testimony, Staff has not presented evidence that
3 establishes that its framework is needed to satisfy the standard reflected in Senate Bill No. 4 ("SB
4 4") adopted by the legislature this year and as I discuss further below, Staff's framework is directly
5 at odds with numerous state policies that strongly suggest the state is supportive of the economic
6 development benefits new large loads would bring to the state.

7 Until very recently, utilities across the country have not seen the incredible economic
8 development potential to attract and serve large customers like those that are seeking power today.
9 As a state, we must avoid putting up the "closed for business" sign, which could happen if we
10 default to a framework like that reflected in Staff's positions in this case. Instead, as the
11 Commission considers the various proposals to serve large load customers before it, it should
12 absolutely ensure that the proposals are consistent with SB 4. But the policies reflected in SB 4
13 should be read in the context of the policies reflected in state law as a whole. Beyond that, the
14 Commission should also consider whether each of the proposals in this case would help or harm
15 Missouri in its bid to attract new economic development.

16 **Q. Are there specific provisions that cause the greatest concern if they were**
17 **adopted in Missouri?**

18 A. Yes. I have personally participated in numerous and extensive discussions with
19 potential large load customers, and I have heard firsthand how they are evaluating the different
20 jurisdictions across the country. From these conversations, I believe that if Missouri were to adopt
21 Staff's overall proposal in general, and more specifically, the provisions that Mr. Wills discusses
22 in his Surrebuttal Testimony, our state would be among the last to be considered by them.

1 **Q. Some have suggested that the Commission adopt more stringent provisions in**
2 **the large load customer rate plans because that is what certain other states have done. Who**
3 **is Missouri competing with in economic development, and how should the Commission think**
4 **about this competition with them as it relates to this case?**

5 A. The Missouri Partnership is the state's lead business attraction agency, with the
6 primary mission of marketing Missouri to bring new jobs and investment here, and it works under
7 the auspices of the Missouri Department of Economic Development. Last year, it published a
8 report titled "Missouri's Strengths & Weaknesses in Attracting Companies," which spanned fiscal
9 years 2016 to 2023. During this time, of those projects with a known location that ultimately chose
10 a state other than Missouri, 38 projects were lost to states in the Southeast U.S. and 17 were lost
11 to other Midwest states (not including Kansas). North Carolina, Georgia, Tennessee, Arkansas,
12 Wisconsin, Virginia, Texas, Michigan, Kentucky, and Indiana topped the list of the states to whom
13 the state of Missouri lost. Many of these states have long been known for their success in attracting
14 large businesses and data centers, including Virginia, Texas, and Georgia, with emerging states
15 including North Carolina, Indiana, Ohio, Arkansas, Mississippi and Louisiana among others.
16 Missouri also lost 25 projects during this period to Kansas.¹

17 In this case, while Office of the Public Counsel ("OPC") witness Geoff Marke points to
18 states such as Ohio and Kentucky that have adopted provisions in their large load rate plans that
19 appear designed to impose greater obligations on large load customers than may be contemplated
20 in either Evergy's or Ameren Missouri's proposals, it is important to note the overall landscape in
21 which Missouri is competing. Yes, this Commission could adopt terms that cause large load

¹ Kansas is delineated separately due to the unique nature of the KC Metro, which is bisected by the state line. Thus, a project may have landed in KC Metro, but on either side of the state line, obscuring the data somewhat in this analysis for a state vs. state comparison.

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1 customers to overpay or otherwise seek to eliminate and overcompensate for *all* risk to other
2 customers,² but that would only serve to set Missouri back relative to our top competitors. The
3 goal should not be to adopt the most onerous terms for these loads possible. Instead, the
4 Commission should apply SB 4 to, in effect, reasonably ensure a fair rate structure for all that
5 charges large load customers based on their representative share of costs but no more, all while
6 considering whether the decisions it makes helps or hurts our ability to bring tremendous jobs and
7 investment to our state. Chasing other states to see who can be the "toughest" on the large load
8 customers not only in my view goes beyond any reasonable understanding of SB 4 in light of the
9 state's overall policies relating to economic development, but it also hurts the state in the long run.
10 Evergy has taken an approach that based on its circumstances is designed to attract these customers
11 while complying with SB 4, just as Ameren Missouri has done with its own Large Load Rate Plan.
12 This is how economic development works generally, which includes programs created by state law
13 that produce different incentive levels in different locations (e.g., certain incentives are determined
14 by the county in question's average wage), and by state programs that apply different economic
15 development terms depending on location as well (like Enhanced Enterprise Zone and Advanced
16 Industrial Manufacturing Zone designations).³ What the Commission should be doing here is to
17 decide, based on the record in this case, whether Evergy's proposal will support the state's goals in
18 promoting economic development while providing the reasonable assurances from a regulatory
19 standpoint SB 4 requires.⁴

² A standard that as I understand it is never met in setting rates in general, as Mr. Wills' Surrebuttal Testimony discusses, since cost-of-service ratemaking is not an exact, to the penny science.

³ [Enhanced Enterprise Zones | Department of Economic Development](#); [Advanced Industrial Manufacturing Zones Act Program Summary | Department of Economic Development](#). Chapter 100 arrangements also vary based on location.

⁴ Just as the Commission should do in Ameren Missouri's case, based upon the record in that case and Ameren Missouri's circumstances.

1 **Q. In his rebuttal testimony staff witness James Busch offered the perspective**
2 **that in his "opinion" attracting large electric load customers like data centers are not "worth**
3 **the risk." Is this opinion an appropriate decision-making criterion that should be considered**
4 **in this case?**

5 A. No. As Mr. Busch himself stated, he is offering his opinion on this topic, but his
6 opinion reflects an apparent reading of SB 4 that completely ignores the context in which it was
7 enacted, that is, against the backdrop of strong state policy support for strongly competing for new
8 loads like this. Mr. Busch's viewpoint reflects a bias that is not borne out by the facts. He is
9 dismissive of the jobs created during the building phase and even once the facilities were
10 operational, ignores the massive economic benefits thousands of construction jobs over many years
11 will create, and greatly understates the hundreds of high paying permanent jobs data center
12 operations will bring, not to mention the taxes and other economic benefits to the state. His opinion
13 that it's not "worth the risk" also reflects a dismissive attitude toward the Missouri statutes – passed
14 by the General Assembly and enacted into law by the Governor – that are explicitly designed to
15 attract these customers. The very existence of these laws and the engagement of the Missouri
16 Department of Economic Development in using them to attract these customers, in fact,
17 demonstrates that the state of Missouri has a different opinion than Mr. Busch.

18 **Q. Please elaborate on the job creation potential of a data center and large load**
19 **customers. Why should this not be dismissed as insignificant?**

20 A. In his rebuttal testimony, Mr. Busch made sweeping and entirely negative
21 generalities regarding the job creation potential at data centers as compared to large manufacturers
22 and inaccurately deriding the permanent Missouri jobs created at data centers as "just a handful."
23 It is not clear what amount of job creation would be acceptable to Mr. Busch, but it should be noted

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1 that there are, in fact, tremendously positive job creation opportunities from data center
2 development.

3 Missouri is currently competing for economic development opportunities like the many
4 large data centers that have been announced across the country. In 2024, Amazon Web Services
5 ("AWS") announced an \$11 billion capital investment and 1,000 new jobs created in South Bend,
6 Indiana.⁵ In a press release on this project, Indiana Governor Holcomb noted this AWS data center
7 would be "the largest capital investment announcement in Indiana's history."⁶ It is for precisely
8 this reason – quality job creation – that I have seen strong support for development like this from
9 representatives across the construction and skilled trades.

10 Mr. Busch is correct that generally a manufacturing enterprise may employ more people
11 than a similarly sized data center. However, as the state of Missouri contemplates its economic
12 development strategy, it must compete in the actual modern economy, not a theoretical one.
13 Manufacturing is and must remain central to Missouri's economy, representing 11.6% of our total
14 labor force and 11.7% of the Gross State Product.⁷ At the same time, we must be prepared to
15 attract new jobs and investment based on the opportunities presented at this time. One recent
16 industry forecast suggests approximately \$2.8 trillion in capital investment in the U.S. by data
17 centers through 2030.⁸ This is not an either-or situation. To succeed, Missouri must compete for
18 economic development across multiple sectors. We must compete for both manufacturing and data
19 centers, among other industries. This is a new moment, and it requires new thinking.

⁵ [AWS plans \\$11 billion Indiana investment](#)

⁶ [Gov. Holcomb announces Amazon Web Services plans to invest \\$11B to create a new data center campus in Northern Indiana](#)

⁷ [2024 Manufacturing Brief | Missouri Economic Research and Information Center](#)

⁸ [The future of US hyperscale data centers | McKinsey](#)

1 It would be a great tragedy with profound long-term negative consequences for our state's
2 economy to dismiss this moment as "not worth it." As the economy is rapidly changing, it is
3 appropriate (and now required by Senate Bill 4) to determine the right electric rate structures to
4 serve new large load electric customers, which is the basic question in Evergy's and Ameren
5 Missouri's dockets on this matter, but the parties in these cases should not utilize these proceedings
6 to stymie economic development. It is "worth it" to get this right, and it is "worth it" to attract the
7 jobs and investment here.

8 **Q. Is the use of economic development incentives inconsistent with the benefits**
9 **provided by these economic development projects?**

10 A. No. Despite Mr. Busch's opinion on the use of economic development incentives,
11 the state of Missouri has enacted the laws I discuss below expressly to attract customers like the
12 ones discussed in this docket. It is important to note several points regarding this topic. First, the
13 DED was created by the Missouri Constitution to "administer all programs provided by law
14 relating to the promotion of the economy of the state, the economic development of the state..."⁹
15 Second, the state of Missouri enacted the Data Center Sales Tax Exemption Program in 2018 for
16 the express purpose of assisting with the attraction of data centers to Missouri. The DED
17 implements this program, along with many other incentive programs created by statute including
18 Missouri Works, Brownfield Remediation, and the BUILD program, to attract businesses and jobs
19 to Missouri. According to the DED, "*the purpose of the [Data Center Sales Tax Exemption*
20 *Program] is to incentivize the location and expansion of data centers in the State of Missouri by*
21 *providing an exemption, for a period of time, of the sales and use taxes associated with a variety*

⁹ [CurrentMissouriConstitution.pdf](#)

1 of activities necessary to build a new facility or expand an existing facility (emphasis added)."¹⁰
2 Third, explicit in the data center incentive statute is the law's requirement that "the amount of any
3 exemption provided ... shall not exceed the projected net fiscal benefit to the state..."¹¹ This is an
4 important principle embedded in many economic development programs to ensure that the use of
5 incentives are net positive to Missouri. Mr. Busch is right that these incentives may decrease the
6 potential tax revenues received during the exemption period, but the law explicitly requires that
7 the exemption is not greater than the net benefit to the state, and following the exemption period,
8 the businesses would pay the full tax amounts going forward. In my experience, the incentives
9 provided to attract economic development are far less than the overall benefits to Missouri.

10 Missouri is competing on a global and national stage to attract jobs and investment. Other
11 states and jurisdictions utilize incentive programs to attract them to their area, and Missouri has
12 created various incentive programs over many years to compete with those other states and help
13 bring the positive benefits here instead. While some, such as apparently Staff, may disagree with
14 the idea of using any incentives to attract large businesses to Missouri, the state of Missouri has
15 already spoken on this issue by enacting these very programs with the explicit purpose to entice
16 businesses to locate here, and it included numerous safeguards to ensure that the state's interests
17 were protected in doing so.

18 **IV. MISSOURI'S LEADERS SUPPORT ECONOMIC DEVELOPMENT**

19 **Q. On what do you base your opinion that attracting large businesses is really a**
20 **top priority for the state of Missouri and its leaders?**

¹⁰ [Data Center Sales Tax Exemption Program | Department of Economic Development.](#)

¹¹ [Missouri Revisor of Statutes - Revised Statutes of Missouri, RSMo Section 144.810](#)

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1 A. On the state's own actions. Indeed, it is difficult to think of any Missouri Governor
2 or General Assembly in recent memory who has not made economic development one of their top
3 priorities. That is certainly true of both the current and immediately previous Governor, whose
4 terms have coincided with the recent boom in large load and data center development.

5 Former Governor Mike Parson, when he served in the Missouri Senate, sponsored the state
6 of Missouri's Data Center Sales Tax Exemption program in 2018, which was signed into law by
7 then-Governor Jay Nixon. Notably, despite early versions of the program having been vetoed by
8 Nixon, the General Assembly continued to bring the program back for consideration, resulting in
9 today's law.

10 During his entire term, Governor Parson prioritized economic development across his
11 administration, with a focus on workforce and infrastructure development. As it relates to data
12 centers and large electric load customers, two of Missouri's most prominent economic
13 development "wins" during this time included the Meta and Google data center announcements in
14 the Kansas City region, resulting in an approximately \$2 billion capital investment. Elected
15 officials spanning the political spectrum noted the importance of these projects to the state and its
16 communities. As Governor Parson said:

17 Google's selection of the Kansas City region is another example of
18 our state's ability to attract and support world-class companies. Our
19 skilled workforce, superior infrastructure, and prime business
20 climate continue to result in investments from leading employers.
21 We welcome Google to Missouri and look forward to the positive
22 impact it will provide for our growing high-tech sector.¹²

23 Kansas City Mayor Quinton Lucas agreed that these data centers were beneficial for the region:

24 Meta's investment in Kansas City is a clear signal that our city is a
25 place where innovation, talent, and community come together. We
26 look forward to working with Meta to ensure this development

¹² [Google Announces \\$1 Billion Data Center In Kansas City, Missouri - Missouri Partnership](#)

1 integrates well with our community priorities and delivers
2 meaningful benefits for Kansas City residents.¹³

3 Civic leaders echoed these sentiments as well. Tracey Lewis, President and CEO of the Economic
4 Development Corporation of Kansas City, Missouri, said:

5 Meta's investment in Kansas City is more than a billion-dollar vote
6 of confidence in our people and our potential. From the thousands
7 of skilled trade workers who helped build the facility to the
8 operational jobs it will support for years to come, this project is
9 creating real opportunities for Kansas Citians and strengthening our
10 local workforce.¹⁴

11 **Q. Has advancing economic development through constructive energy policies**
12 **continued to be a priority for the current Governor and administration?**

13 A. Unequivocally, yes. In his 2025 state of the state address, shortly after taking office,
14 Governor Kehoe outlined his top priorities for Missouri, which are public safety, economic
15 development, agriculture, education, and government improvements.¹⁵ As it relates to economic
16 development, Governor Kehoe said, "We're going to work hard to retain and recruit businesses
17 here in Missouri." He noted his support for the extension of economic development incentives,
18 and he said, "infrastructure and economic development go hand in hand."¹⁶

19 Following his state of the state address, Governor Kehoe outlined the early
20 accomplishments of his administration in his first 100 days in office. One accomplishment he
21 highlighted was signing Senate Bill 4, which he described as "ensuring safe, reliable, and
22 affordable power is generated right here in Missouri *and supporting long-term economic*
23 *development efforts* (emphasis added).¹⁷ SB 4, of course, plays a prominent role in the various

¹³ [Meta Data Center Opens; Represents \\$1B Investment in Missouri - Missouri Partnership](#)

¹⁴ [Meta Data Center Opens; Represents \\$1B Investment in Missouri - Missouri Partnership](#)

¹⁵ [SECURING MISSOURI'S FUTURE: Governor Kehoe Delivers First State of the State Address | Governor Mike Kehoe](#)

¹⁶ [EMBARGOED 2025 State of the State Address Media Copy.pdf](#)

¹⁷ [Marked by Decisive Action and Meaningful Progress: Governor Kehoe's First 100 Days | Governor Mike Kehoe](#)

1 large load rate plans currently before the Commission. It is important to note here the duality of
2 the Governor's statements: providing the power *and* supporting economic development, which he
3 further outlined upon signing the bill into law:

4 With this legislation, Missouri is well-positioned to attract new
5 industry, support job growth, and maintain affordable, reliable
6 energy for our citizens. This is about powering Missouri for
7 Missourians and not relying on other states and countries to produce
8 our power. This legislation strengthens our economic development
9 opportunities, helps secure our energy independence, and provides
10 consumer protections to build a resilient energy future for
11 generations to come. The legislation is designed to respond to
12 skyrocketing energy demand and outdated energy policy,
13 introducing vital reforms to ensure Missouri can meet its growing
14 electricity needs.¹⁸

15 Senior members of Governor Kehoe's administration are carrying out the Governor's
16 priorities, particularly as it relates to providing energy to support large load economic development
17 opportunities. Speaking about the recent Nuclear Summit, Department of Natural Resources
18 Director Kurt Schaefer said,

19 Capitalizing on this momentum will show that Missouri can be a
20 forerunner in nuclear technologies. Otherwise, Missouri could lose
21 out on the monumental amount of private sector investment and jobs
22 up for grabs to states that succeed in delivering a carbon-free and
23 reliable energy landscape.¹⁹

24 Similarly, speaking on the decision by a data center to locate in Kansas City, Missouri's
25 Department of Economic Development Director Michelle Hataway said, "DED is proud to join
26 our partners in supporting Edged's impressive new facility in Kansas City. This exciting project

¹⁸ [Governor Kehoe Signs SB 4 into Law, Securing Missouri's Energy Future and Economic Growth | Governor Mike Kehoe](#)

¹⁹ [Energy leaders commit to explore Missouri's energy future at Nuclear Summit | Missouri Department of Natural Resources](#)

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1 exemplifies our state’s ability to attract and support next-generation companies as they invest,
2 innovate, and help Missourians prosper.”²⁰

3 It is clearly the will of the state of Missouri to succeed in economic development, and that
4 expressly includes the type of large electric load customers who bring billions of dollars in new
5 capital investment and thousands of new jobs. The economy continuously evolves as customer
6 demands and technology change. To stay competitive over the years, the state of Missouri has
7 enacted and modified both economic development and energy policies to compete and win. As
8 parties in the various large load customer rate cases and other related dockets are debating the
9 merits of each filing, whether or not attracting these large load customers is worth pursuing is not
10 a question that is up for debate. There should be no question that the policy of the state of Missouri
11 is to attract these types of customers here. The analysis in all these proceedings should remember
12 Governor Kehoe's dual guidance cited above: provide the power *and* support economic
13 development. The simple truth is that service terms that do not allow Missouri to compete for the
14 customers who will bring the economic development in the first place won't do either.

15 **Q. Does this complete your Surrebuttal Testimony?**

16 A. Yes.

²⁰ [Edged Data Centers opens new data center in Kansas City, investing more than \\$143 million | Department of Economic Development](#)

