

Exhibit No. 306

Missouri Electric Commission – Exhibit 306
Testimony of Steven A. Stodden
Rebuttal
File No. EA-2024-0302

Exhibit No.: _____
Issues: The Need for, Feasibility of and Benefits of
the FDIM Project which further
Promotes the Public Interest
Witness: Steven A. Stodden
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: MEC
File No.: EA-2024-0302

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

FILE NO. EA-2024-0302

REBUTTAL TESTIMONY

OF

STEVEN A. STODDEN

ON BEHALF OF

**THE MISSOURI JOINT MUNICIPAL ELECTRIC
UTILITY COMMISSION d/b/a
MISSOURI ELECTRIC COMMISSION**

JANUARY 14, 2025

I. INTRODUCTION OF WITNESS AND TESTIMONY

Q. Please state your name, title, and business address.

A. My name is Steven A. Stodden. I am the Chief Energy Officer of the Missouri Public Utility Alliance (“MPUA”), which includes the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”). MEC’s business address is 2200 Maguire Boulevard, Columbia, MO 65201.

Q. Please describe your professional background.

A. I joined MPUA as a full-time employee in 2024 as its Chief Energy Officer. I oversee the Engineering Department, which is responsible for MPUA’s power generation assets, electric transmission assets, environmental compliance, energy metering, SCADA, resource planning, transmission planning, new resource additions and resource optimization. Prior to my employment at MPUA, I started my career in 1992 working for the international engineering firm Black & Veatch doing detailed design of power generation facilities. In 1998, I transitioned to City Utilities in Springfield, Missouri and enjoyed a 26-year career beginning as Senior Engineer of Power Systems to ultimately serving as Vice President over Electric Supply, as well as short times over Natural Gas, Water, Transit, Fleet and Facilities. During my tenure over Electric Supply, I also served as Senior Manager for NERC Compliance and was responsible for City Utilities’ power generation facilities, power marketing, Southwest Power Pool compliance and system planning. I received a Bachelor of Science degree in Electrical Engineering from Iowa State University in 1992, and I am a registered Professional Engineer in the State of Missouri. My current curriculum vitae is attached as Schedule SS-1.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of MEC, an intervenor in this proceeding.

Q. Have you previously testified before the Missouri Public Service Commission?

A. No.

Q. What is the purpose of your testimony?

A. My testimony provides further explanation and information additional to the testimony of ATXI witnesses Justin Davies and Tracy Dencker, and Staff's witnesses Malachi Bowman and Claire M. Eubanks, P.E., regarding MEC's perspective as a Project Partner in the Fairport-Denny-Iowa-Missouri Project ("FDIM Project") on the need for and benefits to the public within the MISO footprint generally, and more specifically to MISO's Missouri Zone 5 which includes MEC's members.

Q. Please summarize your testimony.

A. The FDIM Project is needed to assist in resolving forecasted thermal issues in Missouri, increase transfer levels across the MISO region and improve grid resiliency during extreme weather events. Based on MEC's experience partnering with ATXI on other successful transmission projects, it is my opinion that the FDIM Project is economically feasible and that this partnership between MEC and ATXI on the FDIM Project benefits the public with the lowest cost and the earliest date for commencement of operations.

II. MEC'S SUPPORT FOR ATXI'S REQUESTED CCN FOR THE FDIM PROJECT

Q. Does MEC need ATXI to receive the CCN for the FDIM Project?

A. Yes.

Q. Please explain MEC's need for ATXI's construction of the FDIM Project?

A. Given my responsibilities as MPUA's Chief Energy Officer for resource planning, transmission planning, new resource additions and resource optimization, I am keenly aware of the need – particularly within MISO's Missouri Zone 5 – for a robust transmission system that will reliably move energy from generation to load. On MPUA's behalf, I must plan years into the future to meet this need and, to the best of my ability, predict future changes in the power industry and prepare for contingencies, including severe weather. Therefore, I agree with ATXI witness Justin Davies that we must plan for shifts in the energy fleet and changes in utilities' energy plans and goals, as well as the too-frequent extreme weather events. I also agree with Staff witness Malachi Bowman that the FDM Project is needed to complete Phase 1 of the Missouri jurisdictional portion of MISO's LRTP Tranche 1 Portfolio, and that MISO's own study shows that the FDM Project (as part of the entire Portfolio) is likely to resolve forecasted thermal issues in Missouri, increase transfer levels across the MISO region and improve grid resiliency during extreme weather events.

Q. Has MEC found the FDM Project to be economically feasible?

A. Yes

Q. Please explain how MEC concluded that the FDM Project is economically feasible?

A. Part of my responsibilities at MPUA include being involved in the other partnership projects of MEC and ATXI/Ameren. The partnership for the Hannibal Electric Transmission facilities dates back to 2022, and the Sikeston-New Madrid Electric Transmission facilities were acquired in early 2024. Both of these partnership projects are not only feasible but successful, and thus I am of the opinion that the FDM Project will also be feasible and successful. I therefore agree with Staff witness Claire M. Eubanks, P.E. that ATXI/Ameren has been in

business for years, has previously been granted CCNs by this Commission, and that it has successfully developed and operated transmission in Missouri.

Q. Does ATXI's request for a CCN for the FDIM Project benefit or promote the public interest?

A. Yes.

Q. How does MEC's partnership with ATXI for construction and operation of the FDIM Project benefit or promote the public interest?

A. Here, I agree with ATXI's Tracy Dencker that the collaboration between MEC and ATXI benefits both parties and the public. MEC's member municipalities (who directly serve the public) will benefit from access to the power transmitted by the FDIM Project, and from ATXI's expertise in construction, operation and maintenance of such transmission projects. ATXI (and the public generally) will benefit from MEC's partnership which will help lower the overall cost of the FDIM Project. Further, I find it a significant public benefit that one of the reasons MISO gave for awarding the FDIM Project to ATXI and MEC was that they propose to energize FDIM by February 8, 2028, the earliest date suggested in all of the competitively-bid proposals received by MISO.

Q. What are the facts or data upon which you reasonably relied to form your opinions and conclusions expressed in this testimony?

A. I have of course relied upon my many years of education and experience as a Professional Electrical Engineer serving in the power industry. Additionally, I relied on MISO's award of the competitively-bid FDIM Project to ATXI and MEC for the reasons set forth in MISO's October 27, 2023 "Selection Report." I further included in my analysis the "Missouri Public Service Commission Staff Recommendation" filed in this case on

December 20, 2024.

Q. Do you hold the opinions you've expressed in this testimony to a reasonable degree of engineering certainty?

A. Yes.

Q. Does this conclude your pre-filed rebuttal testimony in this case?

A. Yes. However, I wish to preserve the right to provide additional pre-filed testimony or testimony at the hearing to rebut the testimony of any other party.

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AFFIDAVIT OF STEVEN A. STODDEN

Steven A. Stodden, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying rebuttal testimony and schedules; that said testimony was prepared by him or under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

Steven A. Stodden

Subscribed and sworn to before me this 13th day of January, 2025.

Angela

Notary Public

My commission expires: JAN. 4, 2027

