Exhibit No. 503

Renew Missouri – Exhibit 503
Testimony of Jessica Polk Sentell
Surrebuttal
Case No. ET-2025-0184

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Issues:	Policy
Witness:	Jessica Polk Sentell
Sponsoring Party:	Renew Missouri Advocates
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MISSOURI PUBLIC SERVICE COMMISSION

ET-2025-0184

SURREBUTTAL TESTIMONY

OF

JESSICA POLK SENTELL

ON BEHALF OF

RENEW MISSOURI ADVOCATES

November 3, 2025

Q. Please state your name and business address.

A. My name is Jessica Polk Sentell, and my business address is 501 Fay Street, Suite 206, Columbia, MO 65201.

Q. Are you the same Jessica Polk Sentell who submitted rebuttal testimony that was filed September 5, 2025?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to the Rebuttal Testimony of Sierra Club witness Ms. Caroline Palmer regarding the Clean Energy Choice Rider ("Rider CEC"), Clean Capacity Advancement Program ("Rider CCAP"), and Renewable Solutions Program–Large Load Customers ("Rider RSP LLC").

Q: Please summarize your testimony.

A: I will briefly discuss data centers in Missouri and the optional clean energy riders, and how that context informed Renew Missouri's position when evaluating the proposed tariffs. Our overall recommendation is to support Sierra Club's proposed changes to the optional clean energy riders as well as to support Ms. Palmer's redefining clean energy resources. However, if our options are to support the optional clean energy riders as proposed by Ameren or have no optional clean energy riders at all, we would still support the optional clean energy riders as proposed by Ameren.

DATA CENTERS

Q: Please briefly explain the circumstances that informed your approach to evaluating large load tariffs.

A: We understand Sierra Club's and others' concerns about the impact of large loads, and data centers in particular, on Ameren Missouri's generation and transmission, concerns about power and water use, and if there should be general policies encouraging or pursuing large load development. However, Renew Missouri believes that last question has been answered, for now, by our State's executive and legislative branches as well as federal officials and regulators.[1] Furthermore, on October 23, 2025, the Secretary of Energy sent a letter to the Federal Energy Regulatory Commission ("FERC"), directing FERC to institute a rulemaking allowing large loads, including data centers, connection to transmission systems in a timely, orderly, and non-discriminatory way.[2] Renew Missouri understands this as a signal of the federal administration's interest in fostering this sector.

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[1] Although I am not an attorney, Senate Bill 4 ("SB4") contains provisions relating to large load customers.

> Each electrical corporation providing electric service to more than two hundred fifty thousand customers shall develop and submit to the commission schedules to include in the electrical corporation's service tariff applicable to customers who are reasonably projected to have above an annual peak demand of one hundred megawatts or more. The schedules should reasonably ensure such customers' rates will reflect the customers' representative share of the costs incurred to serve the customers and prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from service to such customers. Each electrical corporation providing electric service to two hundred fifty thousand or fewer customers as of January 1, 2025, shall develop and submit to the commission such schedules applicable to customers who are reasonably projected to have above an annual peak demand of fifty megawatts or more. The commission may order electrical corporations to submit similar tariffs to reasonably ensure that the rates of customers who are reasonably projected to have annual peak demands below the above-referenced levels will reflect the customers' representative share of the costs incurred to serve the customers and prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from service to such customers. https://www.senate.mo.gov/25info/pdf-bill/perf/SB4.pdf
>
> Governor Kehoe has stated one of the intentions of SB4 was to attract new industry and support job growth. https://governor.mo.gov/press-releases/archive/governor-kehoe-signs-sb-4-law-securing-missouris-energy-future-and-economic&sa=D&source=docs&ust=1761256523218271&usg=AOvVaw2snAlc7dcnSw2Njd1pUB_Z

The Missouri Department of Economic Development has a Data Center Sales Tax Exemption Program | Department of Economic Development.

The director of the Missouri Department of Economic Development is publicly courting ten data centers. https://www.stlpr.org/health-science-environment/2025-10-20/data-centers-ameren-missouri-28m-electric-bills-rise?fbclid=IwY2xjawNoY_hleHRuA2FlbQIxMABicmlkETFEYmprOFVvOUpVTUlmR3IzAR4a0LxFlNLpfm3cKgtHuWcpw5Pgbc7plsEXByzxDldcoge-FBsCj6C1MquyhQ_aem_zKyS9ouzsaDChYvR9DA_6A

[2] Re: Secretary of Energy's Direction that the Federal Energy Regulatory Commission Initiate Rulemaking Procedures and Proposal Regarding the Interconnection of Large Loads Pursuant to the Secretary's Authority Under Section 403 of the Department of Energy Organization Act, dated October 23, 2025, accessible at https://www.energy.gov/sites/default/files/2025-10/403%20Large%20Loads%20Letter.pdf

If the data centers are coming, then these large load tariffs need to be in place in order to allow the Commission to determine and review appropriate tariffs and riders now and going forward in rate cases to ensure residential and small businesses are not carrying more than their fair share of costs from bringing large loads online. Right now, the *status quo* would lead all customers to share the costs of additional generation. Furthermore, without any optional renewable riders, Renew Missouri also has concerns about reducing opportunities for large load customers to provide their own capacity or pay for requested renewable generation to serve them. Such an absence could proliferate expensive natural gas generation subject to pricing risks and volatility in its fuel costs[3] while suffering reliability problems during winter storm events,[4] in addition to a myriad of environmental concerns.[5]

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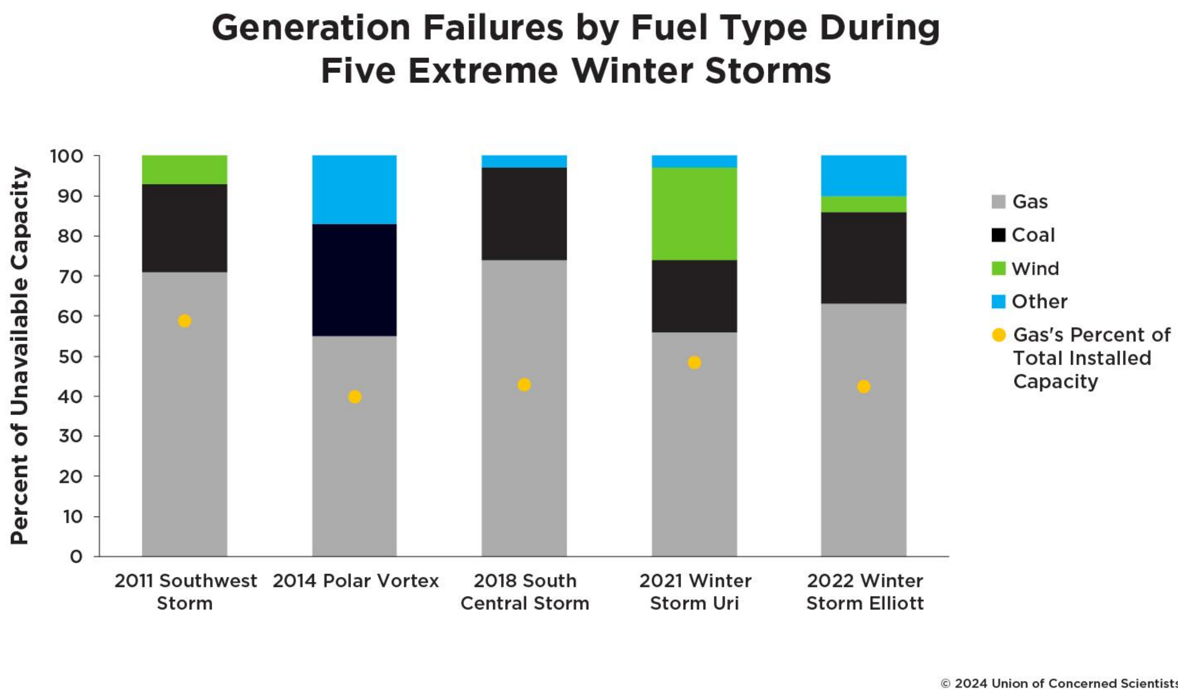
[3] See Ex. 500, *Rebuttal Testimony of William "Nick" Jones,* In the Matter of the Application of Evergy Missouri West, Inc. d/b/a Evergy Missouri West and Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Permission and Approval of Certificates of Convenience and Necessity for Natural Gas Electrical Production Facilities, Case No. EA-2025-0075. Furthermore, a recent Lazard report again affirms renewable generation and battery storage systems have comparable or even lower levelized cost of energy, even without tax incentives. Study available at https://www.lazard.com/news-announcements/lazard-releases-2025-levelized-cost-of-energyplus-report-pr/

[4] US Energy Information Administration - Winter storms have disrupted U.S. natural gas production
Utility Drive - Gas plants 'disproportionately vulnerable to failure,' warns Union of Concerned Scientists report
Union of Concerned Scientists - Gas Malfunction Calling into Question the Reliability of Gas Power Plants.
Final Report on February 2021 Freeze Underscores Winterization Recommendations | Federal Energy Regulatory Commission
A year after devastating winter storm, power plant problems 'still likely' in extreme weather • Missouri Independent
Winter Reliability, A Growing Not Passing Problem - Center for Strategic and International Studies

[5] "We find that air pollution in 2016 from the oil and gas sector in the US resulted in 410000 asthma exacerbations, 2200 new cases of childhood asthma and 7500 excess deaths, with $77 billion in total health impacts… When monetized, these air quality health impacts of oil and gas production exceeded estimated climate impact costs from methane leakage by a factor of 3." Jonathan J Buonocore et al 2023 Environ. Res.: Health 1 021006, accessed at https://iopscience.iop.org/article/10.1088/2752-5309/acc886/pdf
Conservative estimates show Missouri alone could experience annual savings of $10,000 to over $1 million, depending on the county, in avoided health costs by implementing a clean energy portfolio instead of a natural gas reliant portfolio. Accessed at https://rmi.org/hidden-health-costs-of-gas-fired-power-plants/
A Union of Concerned Scientists study recently found a proposed approximately 1200 MW natural gas facility in Wisconsin would cost citizens $5.7 billion in adverse health costs and impacts, and resulting economic consequences. Study acccessible at https://blog.ucs.org/maria-chavez/new-analysis-shows-public-health-impacts-of-proposed-gas-plants-in-wisconsin/



[6]

In addition to needing a large load tariff being in place to allocate costs, opportunities for large load customers to reduce the amount of expensive natural gas generation that all customers must pay for or additional revenues to further reduce cost of service are important.

Furthermore, as noted in my rebuttal testimony, these companies will go where they have clean energy access.[7] In order to effectuate the directive of the state, this is a vital and valuable tool in the arsenal of economic development.

CLEAN ENERGY RIDER MODIFICATIONS

Q: Please explain Sierra Club's recommendations to the optional clean energy riders.

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[6] https://www.ucs.org/sites/default/files/styles/original/public/2024-01/Fig1_web-01.jpg?itok=-Gx45Atg

[7] Rebuttal Testimony of Jessica Polk Sentell, p. 8, l. 14-p. 9, l. 8.

A: Ms. Palmer made four suggestions regarding the aforementioned optional Riders CEC, CCAP, and RSP LLC.

<u>CEC rider suggestions</u>

1. Updating Rider CEC language to "proposed or existing resources" and "modify the definition of Clean Energy Preferred Resource Plan to read 'the addition and/or retirement of one or more generation resources.'"[8]
2. Narrow the definition of clean energy resources. "Ameren should narrow its definition of Clean Energy Resource under the tariff, which currently reads: 'A resource that does not contribute any net carbon emissions to the atmosphere.' This definition is overly broad in terms of what generation resources constitute 'clean energy'; at the same time, it is unclear if it also includes non-generating resources. The tariff should instead specify Clean Energy Resources as: renewable energy, demand management, and/or storage."[9] Let it be noted that Renew *strongly* supports this modification.
3. "To the extent that the requesting customer brings a resource that replaces something that would have been paid for through other customer rates, it may be valid for the Rider CEC agreement to include a credit for the energy and capacity that the large load customer paid for. The recent unanimous settlement regarding Evergy Kansas' large load tariff proposes a very similar rider with many of the elements" Ms. Palmer describes, "such as allowing for asset retirement, demand-side management, energy efficiency, and battery storage, and including 'any

[8] Rebuttal Testimony of Caroline Palmer, p. 41-2.
[9] Rebuttal Testimony of Caroline Palmer, p. 42.

appropriate credit' as part of 'cost recovery from the customer for the selected resources.'"

Riders CCAP and RSP LLC

4. Ms. Palmer specifies any new capacity or renewable resources under the Riders are incremental to Ameren's system (i.e. they must be for resources that would not otherwise be selected or built by the utility).[10]

Q: Please explain Renew Missouri's position on Ms. Palmer's suggested modifications.

A: We support all four of these modifications. All four modifications will enhance the impact of the optional riders. We want to emphasize our support for recommendation #2, redefining clean energy resources. The current language is not sufficient to ensure a narrow enough definition of clean energy.

Q: Do you support Sierra Club's recommendations over those proposed by Ameren?

A: Yes. However, while we support the modifications, we still believe the riders as proposed by Ameren (apart from the clean energy resources definition - that is important to update to Ms. Palmer's definition) are still valuable to all customers and are better than no optional clean energy riders. In short, if Sierra Club's modifications are not approved, our second choice would be to approve the riders using Ameren's proposed language. Renew Missouri would rather see a tariff and *some* optional clean energy riders rather than either the *status quo* (e.g. if the tariff were rejected entirely) or a large load tariff approved with no optional clean energy riders.

ADDITIONAL SUGGESTIONS PROPOSED BY SIERRA CLUB

Q: Did Sierra Club propose any other modifications to Ameren's proposed tariffs?

[10]Rebuttal Testimony of Caroline Palmer, p. 43, l. 1-11.

A: Yes, Sierra Club proposed several modifications to terms and conditions, as well as the underpinning base tariff. Although Renew Missouri did not testify about the appropriate rate design and terms and conditions of the underlying tariff in its rebuttal testimony, Renew Missouri does not oppose Sierra Club's suggestions for modification to the tariff in order to align it with the proposed tariff in the Evergy Large Load case. I should further note those modifications were supported in Missouri and Kansas by a diverse coalition of stakeholders, including Renew Missouri.[11]

CONCLUSION

Q: Please summarize your testimony.

A: Decision-makers and policy officials at both state and federal levels have determined large load customers, including data centers as well as reshoring manufacturing and other industries,[12] are a key component to the country and state's economic development and security. Stakeholders are now left to determine how to best effectuate the decision by the executive and legislative branches. Renew Missouri's rebuttal limited its analysis to supporting the riders for the reasons articulated here and by Sierra Club as to the benefits they provide. However, overall, a tariff and some riders are better than the *status quo* (if the tariff were rejected entirely) or an alternative with no riders. A tariff with no riders could incentivize unrestrained natural gas generation build out, by reducing opportunities for large load customers to provide their own capacity or pay for requested renewable generation to serve them. This would raise rates for all customers, including large load customers, potentially undermining Missouri's original goal. Additionally, Renew Missouri also is supportive

[11] In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of New and Modified Tariffs for Service to Large Load Customers, File No. EO-2025-0154, *Non-Unanimous Global Stipulation,* Ex. 106, *Testimony in Support of Stipulation and Agreement of Kevin D. Gunn*, p. 17, l. 4-17.

[12] Executive Order, issued March 20, 2025, "Immediate Measures to Increase American Mineral Production", accessed at https://www.whitehouse.gov/presidential-actions/2025/03/immediate-measures-to-increase-american-mineral-production/

of the modifications Sierra Club proposes to the riders, if the Commission would choose to order them. Regardless of the modifications, Renew Missouri encourages the Commission to include the optional renewable riders in some fashion in order to provide opportunities to reduce the costs the overall system must bear and pay for, as well as to make Missouri competitive and attractive as a location for economic development, as current policy directs.

Q: Does this conclude your 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 Approval of New and Modified Tariffs for Service to Large Load Customers	))))	**File No. ET-2025-0184**

AFFIDAVIT OF JESSICA POLK SENTELL

STATE OF MISSOURI	)	
	)	**ss**
COUNTY OF WAYNE	)	

COMES NOW Jessica Polk Sentell, and on her oath states that she is of sound mind and lawful age; that she prepared the foregoing Surrebuttal Testimony; and that the same is true and correct to the best of her knowledge and belief.

Further the Affiant sayeth not.

Jessica Polk Sentell

Subscribed and sworn before me this 24th day of October 2025.

Notary Public

KEVIN M YANT
Notary Public - Notary Seal
STATE OF MISSOURI
Commissioned for Wayne County
My Commission Expires 4/23/2028
Commission # 24071076