

Exhibit:
Issue(s): *Ratemaking Mechanisms*
Witness: *Blair Hardin*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *EA-2025-0238*
Date Testimony Prepared: *January 16, 2026*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

SURREBUTTAL TESTIMONY

OF

BLAIR HARDIN

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. EA-2025-0238

Jefferson City, Missouri
January 2026

SURREBUTTAL TESTIMONY
OF
BLAIR HARDIN
UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri
CASE NO. EA-2025-0238

Q. Please state your name and business address.

A. My name is Blair Hardin, and my business address is 1390 Timberlake Manor Parkway, Suite 160, Chesterfield, MO, 63017.

Q. Are you the same Blair Hardin that contributed to Staff's Rebuttal Report filed on December 12, 2025?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of Staff's surrebuttal testimony is to provide clarification of the ratemaking treatment that Ameren Missouri may be eligible for regarding the Big Hollow Energy Center. This clarification is being made considering intervenor rebuttal testimony that has been filed in this docket. In addition, the chart in Staff's rebuttal testimony¹ reflecting total capital expenditures for the base and risk adjusted amounts of the project investment prior to and after application of the investment tax credit ("ITC") is incorrect. The corrected values are provided below.

Q. As a refresher, what ratemaking mechanisms are possibly available for Ameren Missouri to utilize for the Big Hollow Energy Center ("BHEC") project?

¹ Staff Rebuttal Report (HC), page 76 of 99, lines 5-7.

1 A. The Big Hollow Energy Center combustion turbine generator (“CTG”) and
2 Battery Energy Storage Systems “BESS” *may* be eligible for Plant in Service Accounting
3 (“PISA”).

4 Q. Which ratemaking mechanism does Staff wish to clarify eligibility in regard
5 to BHEC?

6 A. Staff would like to clarify PISA eligibility under Section 393.1400.1(3), RSMo,
7 specifically regarding “Qualifying Electric Plant.” The statute defines “qualifying electric
8 plant” as “all rate-base additions, except rate-base additions for new coal-fired generating units,
9 new nuclear generating units, or rate-base additions that increase revenues by allowing service
10 to new customer premises.” [Emphasis added].²

11 Q. Staff discussed this definition within its rebuttal report, what specifically is the
12 clarification?

13 A. In Staff’s rebuttal report, within the Rate Making Considerations section,³
14 Staff stated that both aspects of the Big Hollow project (CTG & BESS) are eligible for PISA.
15 However, PISA eligibility relies on whether the project assets are considered qualifying electric
16 plant as defined in the PISA statute. Rate-base additions that increase revenues by allowing
17 service to new customer premises are specifically ineligible. In his rebuttal testimony, Office
18 of the Public Counsel witness Dr. Geoff Marke recommends that “Ameren Missouri provide
19 positive affirmation that the attendant costs of this application should be borne by the cost
20 causer, in this case, specifically, the hyperscale users that demand it.”⁴ If Ameren Missouri
21 provides this affirmation or the Commission concludes that the Company is building these
22 “rate-base additions that will increase revenues by allowing service to new customer premises,”

² Staff Rebuttal Report, page 69, lines 9-12.

³ Staff Rebuttal Report, pages 69-71.

⁴ Rebuttal Testimony of Dr. Geoff Marke, page 2, lines 3-19.

then under Missouri statute, both of the Big Hollow projects would not be eligible for PISA ratemaking treatment. This distinction was not clarified in Staff's Rebuttal Report. Staff witness Sarah L.K. Lange discusses Staff's recommendations on when a decision for PISA eligibility should be made in her surrebuttal testimony.⁵

CORRECTIONS

Q. Does Staff have any corrections to the Rebuttal Report?

A. Yes. Staff needs to correct the confidential table under the “Impacts of Tax Credits” section page 76, lines 5-7. The table in the Rebuttal Report does not properly reflect the impact of the ITCs on the Big Hollow Energy Project. This new table in surrebuttal testimony demonstrates the correct amounts after applying the first year of the ITC credits.

[illegible]

Q. Does this conclude your surrebuttal testimony?

A. Yes, it does.

⁵ Sarah L.K. Lange Surrebuttal, page 2, lines 7-10.

⁶ Ameren Missouri response to Staff Data Request 0007: “The risk adjusted estimate for the Big Hollow CTG Project is based on a case where all of the project risks come to fruition and all of the higher contingency allowance for such a case is needed to cover total project costs. The key variance between the base and risk-adjusted estimate for Big Hollow BESS is a greater contingency allowance to account for market volatility and other government actions, such as tariffs.”

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for)
Permission and Approval and Certificates of) Case No. EA-2025-0238
Public Convenience and Necessity Authorizing)
it to Construct a New Generation Facility and)
Battery Energy Storage System)

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

Further the Affiant sayeth not.


BLAIR HARDIN

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of St. Louis, State of Missouri, at my office in St. Louis, on this 13th day of January 2026.



Gisela M. Ferguson
Notary Public