

Exhibit No.:

Issue(s): BESS Reporting Requirements

Witness/Type of Exhibit: Robinett/Surrebuttal

Sponsoring Party: Public Counsel

Case No.: EA-2025-0238

SURREBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

CASE NO. EA-2025-0238

January 16, 2026

SURREBUTTAL TESTIMONY

OF

JOHN A. ROBINETT

AMEREN MISSOURI

CASE NO. EA-2025-0238

Q. What is your name and what is your business address?

A. John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.

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

A. I am employed by the Missouri Office of the Public Counsel (“OPC”) as a Utility Engineering Specialist.

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

A. Yes. I have testified in front of the Missouri Public Service Commission (“Commission”) in both my former position with Commission Staff (“Staff”) and in my current position with OPC.

Q. What is your work and educational background?

A. A copy of my work and educational experience is attached to this testimony as Schedule JAR-S-1.

Q. Why are you filing surrebuttal testimony?

A. The purpose of this testimony is to respond to the Staff rebuttal report and its conditions for the Certificate of Convenience and Necessity (“CCN”) for Ameren Missouri’s Big Hollow battery energy storage system (the “Big Hollow BESS”) project.¹

¹ It is important to point out that the pending CCN is for co-locating the storage facility with a combustion turbine(s) and not as back up to renewable energy generation.

1 **Q. Are you supportive of Staff's conditions laid out in its rebuttal report?**

2 A. Generally yes, I am supportive of Staff's conditions; however, an additional condition
3 should be added that requires Ameren Missouri to report certain information about the Big
4 Hollow BESS.

5 **Q. What additional condition should the Commission order?**

6 A. The Commission should impose an additional condition that implements reporting
7 requirements for the Big Hollow BESS to mirror the requirements for generating electric
8 facilities found in 20 CSR 4240-3.190.

9 **Q. Could you specify which reporting requirements you request the Commission order for**
10 **the Big Hollow BESS?**

11 A. I request the Commission to order the following reporting requirements for the Big Hollow
12 BESS to be submitted with Ameren Missouri's monthly electric generating report required
13 by 20 CSR 4240-3.190. Specifically, for the Big Hollow BESS:

- 14 1. Schedule of full and partial planned outages;
- 15 2. Planned and forced outages and derates that occurred during the previous month;
- 16 3. Hourly discharge amount during the previous month;
- 17 4. Hourly day-ahead discharge price for the Big Hollow BESS node;
- 18 5. Hourly day-ahead charge price for the Big Hollow BESS node;
- 19 6. Hourly day-ahead cleared discharge, hourly real-time discharge, and ancillary services for
20 the previous month; and
- 21 7. Hourly charge amount for the previous month.

1 As with the information Ameren Missouri provides in compliance with 20 CSR 4240-
2 3.190(2) and (3), this information should be provided in an electronic format from which
3 the data can be easily extracted for analysis in spreadsheet or database software.

4 In addition to the information above, the Commission should also order Ameren Missouri
5 to follow the incident filing requirements of 20 CSR 4240-3.190(4) Incident Reporting.
6 This reporting should be done for any forced outage of the Big Hollow BESS when there
7 is a loss of at least thirty percent (30%) of total installed capacity that reasonably could be
8 anticipated to last longer than three (3) days, when the cause is due to a common or
9 unforeseen occurrence and when there is a loss of transmission capability that could limit
10 the output of the Big Hollow BESS or the transfer capability into or out of Ameren
11 Missouri's system. The Commission should make it clear that reporting is required within
12 five days of the discovery of the outage and that a detailed investigative report must be
13 provided within 120 days.²

14 Finally, Ameren Missouri should be ordered to meet the requirement of 20 CSR
15 4240-3.190(5) regarding notification to the Commission in the applicable reporting month
16 when Ameren Missouri provides notice of the Big Hollow BESS's retirement to a regional
17 transmission organization or an independent system operator.

18 **Q. Has OPC previously made similar recommendations? If so, where were those**
19 **recommendations proposed?**

20 **A.** Yes, on October 3, 2024, the OPC filed a response to proposed amendments to Commission
21 Rule 20 CSR 4240-3.190, which identifies reporting requirements for electric utilities and

² 20 CSR 4240-3.190(4)(B) and (C).

1 rural cooperatives, in Case Number EX-2025-0034. The OPC's proposed amendments
2 were not adopted by the Commission in that ratemaking case.

3 **Q. Did the Commission explain why it did not adopt the OPC's proposed amendments?**

4 A. The final order of rulemaking filed on December 4, 2024, discussed Staff's response to
5 the OPC's suggestions related to the reporting requirements for battery storage facilities.
6 The final order of rulemaking indicated that the Commission agreed with the following
7 Staff positions with respect to the addition of requirements for battery storage facilities.

8 Staff specifically noted that it was not aware of any electric utility with
9 battery energy storage systems that are currently interconnected at
10 transmission. Staff suggested that these requirements be reevaluated in the
11 next statutory periodic rule review in 2029.

12 The Commission further added the following Staff Statement:

13 Staff also stated that electrical utilities report to the National Energy
14 Regulatory Commission (NERC) via the Generating Availability Data
15 System (GADs). Staff explained that Staff is not aware of any electrical
16 corporations operating battery storage systems co-located with its wind or
17 solar facilities. Staff stated that GADs wind generation and GADs solar
18 generation data reporting instructions outline performance records for
19 energy storage relevant to OPC's suggestions.

20 **Q. What is the reason for adding the reporting requirements of 20 CSR 4240-3.190 to**
21 **the BESS in this case?**

22 A. In rejecting the OPC's proposal to add reporting requirements for battery storage facilities
23 in the rulemaking case the Commission pointed out that such a facility did not yet exist in
24 Missouri and it was possible that the information would be available elsewhere. This case
25 addresses both of these grounds.

26 Importantly, if the Commission grants Ameren Missouri a CCN for the Big Hollow BESS
27 it will be the first large utility-scale energy storage facility in the State of Missouri. This
28 being the first of its kind resource addition, this Commission does not have reporting

1 requirements contemplated by current rules for this type of asset. The purpose of the
2 current Commission generation reporting requirements in 20 CSR 4240-3.190 is:

3 PURPOSE: This rule prescribes requirements and procedures for the
4 reporting of certain events by electric utilities to the commission to inform
5 the commission of developments that may affect the rendering of safe and
6 adequate service and to enable the commission to thoroughly and fairly
7 investigate certain accidents and events that may have an impact in future
8 electric rate proceedings at the time and in the context in which those events
9 occur. This rule also includes electrical facilities accident and event
10 reporting requirements for rural electric cooperatives.

11 Without the recommended reporting requirements, Ameren Missouri is not required to
12 inform the Commission regarding “developments that may affect the rendering of safe and
13 adequate service”³ with the Big Hollow BESS as it is with its thermal and renewable
14 generation resources.

15 Further, it is not clear whether Ameren Missouri will have to submit this data to
16 any entity. Staff’s comments in the rulemaking docket specifically stated that National
17 Energy Regulatory Commission (NERC) “Generating Availability Data System (GADs)
18 wind generation and GADs solar generation data reporting instructions outline
19 performance records for energy storage relevant to OPC’s suggestions.” It is important
20 to point out that the pending CCN is for co-locating the BESS facility with a combustion
21 turbine(s) and not as back up to renewable energy generation. Therefore, the NERC GADs
22 may not apply to the Big Hollow BESS.

23 In addition, these reporting requirements will allow the Commission Staff and OPC
24 to “thoroughly and fairly investigate certain accidents and events that may have an impact

³ See purpose statement of Commission generation reporting requirements in 20 CSR 4240-3.190 above.

1 in future electric rate proceedings at the time and in the context in which those events
2 occur.”⁴

3 **Q. Where does the Commission find itself with respect to the provision of performance**
4 **information if the CCN is granted for the Big Hollow BESS if it does not adopt your**
5 **recommendation?**

6 A. If the Commission does not adopt my recommendation, it is without a rule or reporting
7 procedures for battery storage facilities. Therefore, the Commission may not receive this
8 important information.

9 **Q. Does this conclude your surrebuttal testimony?**

10 A. Yes, it does.

⁴ See purpose statement of Commission generation reporting requirements in 20 CSR 4240-3.190 on previous page.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

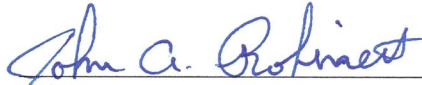
In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission) Case No. EA-2025-0238
and Approval and Certificates of Convenience)
and Necessity Authorizing it to Construct a New)
Generation Facility and Battery Energy Storage)
System)

AFFIDAVIT OF JOHN A. ROBINETT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

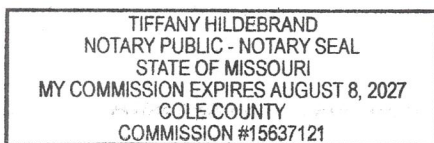
John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

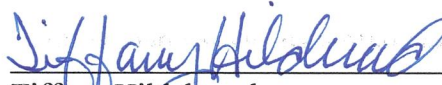


John A. Robinett
Utility Engineering Specialist

Subscribed and sworn to me this 14th day of January 2026.



My Commission expires August 8, 2027.



Tiffany Hildebrand
Notary Public