

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

**COMES NOW** the Staff of the Missouri Public Service Commission, on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding.

A. Does the evidence establish that the 800-megawatt (“MW”) natural gas simple cycle (“NGSC”) generating facility to be located at the site of the former Rush Island generating facility in Jefferson County, Missouri for which Ameren Missouri is seeking a certificate of convenience and necessity (“CCN”) is necessary or convenient for the public service?

- Factor of economic feasibility?

3. Should the Commission find that the NGSC facility satisfies the third *Tartan*

Factor of ability to finance?

4. Should the Commission find that the NGSC facility satisfies the fourth *Tartan*

Factor of qualified to construct?

5. Should the Commission find that the NGSC facility is in the public interest and satisfies the fifth *Tartan* Factor?

B. If the Commission grants the CCN for the NGSC facility, what conditions, if any, should the Commission impose on the CCN?

C. If the Commission grants the CCN for the NGSC facility, should the Commission certify that the requirements of § 393.401.4 RSMo. shall be met by the NGSC facility?

D. Does the evidence establish that 400-megawatt (“MW”) battery energy storage system (“BESS”) to be located at the site of the former Rush Island generating facility in Jefferson County, Missouri for which Ameren Missouri is seeking a certificate of convenience and necessity (“CCN”) is necessary or convenient for the public service?

1. Should the Commission find that the BESS facility satisfies the first *Tartan*

Factor of need?

2. Should the Commission find that the BESS facility satisfies the second *Tartan*

Factor of economic feasibility?

3. Should the Commission find that the BESS facility satisfies the third *Tartan* Factor of ability to finance?
  4. Should the Commission find that the BESS facility satisfies the fourth *Tartan* Factor of qualified to construct?
  5. Should the Commission find that the BESS facility is in the public interest and satisfies the fifth *Tartan* Factor?
- E. If the Commission grants the CCN for the BESS facility, what conditions, if any, should the Commission impose on the CCN?
- F. If the Commission grants the CCN for the BESS facility, should the Commission certify that the requirements of § 393.401.4 RSMo. shall be met by the BESS facility?
- G. If the Commission grants the CCN for the BESS facility, should the Commission order Ameren Missouri to file a report that provides details on the battery system's fire suppression features and incident response plans with first responders?
- H. Should the Commission grant Ameren Missouri's requested variances from Commission Rules 20 CSR 4240-20.0456(J) so that Ameren Missouri's plans for restoration of safe and adequate service after significant, unplanned/forced outages can be provided sixty (60) days prior to the time when each of the NGSC and BESS facilities will be placed in-service?

## **II. Order of Opening Statements**

Ameren Missouri  
Renew Missouri  
Staff of the Missouri Public Service Commission  
Office of Public Counsel

### **III. List and Order of Witnesses**

Stumpf (Ameren Missouri)  
Wibbenmeyer (Ameren Missouri)  
Meyer (Ameren Missouri)  
Michels (Ameren Missouri)  
Arora (Ameren Missouri)  
Wills (Ameren Missouri)  
Polk Sentell (Renew)  
Sh. Lange (Staff)  
Arianda (Staff)  
Won (Staff)  
Gonzales (Staff)  
Tevie (Staff)  
Rucker (Staff)  
Fontana (Staff)  
Bowman (Staff)  
Niemeier (Staff)  
Sa. Lange (Staff)  
Hardin (Staff)  
Poudel (Staff)  
Luebbert (Staff)  
Robinett (OPC)  
Seaver (OPC)  
Marke (OPC)

### **IV. Order of Cross-Examination**

#### **Ameren Missouri Witnesses**

Renew Missouri  
Staff of the Missouri Public Service Commission  
Office of Public Counsel

#### **Renew Missouri Witness**

Ameren Missouri  
Staff of the Missouri Public Service Commission  
Office of Public Counsel

#### **Staff of the Missouri Public Service Commission Witnesses**

Renew Missouri  
Office of Public Counsel  
Ameren Missouri

**Office of the Public Counsel Witnesses**

Renew Missouri  
Staff of the Missouri Public Service Commission  
Ameren Missouri

Respectively Submitted,

/s/ Paul T. Graham

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Attorneys for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 21st day of January, 2026.

/s/ Paul T. Graham