



- A CCN under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage a 250 MW BESS facility to be constructed in Lincoln County, Missouri (the "Millcreek BESS Project" and, together with the Castle Bluff BESS Project and the Huck Finn BESS Project, the "BESS Projects");
- A CCN under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage a new 161 kilovolt ("kV") switching station (the "Quinn Switching Station") in order to interconnect the Millcreek BESS Project to the existing 161 kV transmission system in Lincoln County, Missouri;
- A CCN under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage, through the use of a Build Transfer Agreement ("BTA"), a 175 MW solar generation facility to be constructed in Audrain County, Missouri (the "Tom Sawyer Solar Project" or "Tom Sawyer"), adjacent to Ameren Missouri's Huck Finn Solar Energy Center ("Huck Finn Solar"). The Project will include an approximately 2-mile generator lead-line interconnecting the Company's existing Spencer Creek 345 kV switching station via a 345 kV lead-line shared with Huck Finn Solar;
- A CCN under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage, through the use of a BTA, a 225 MW solar generation facility to be constructed in Stoddard County, Missouri (the "Ringer Solar Project" or "Ringer" and, together with the Tom Sawyer Solar Project, the "Solar Projects;" the BESS Projects and the Solar Projects, collectively the "Projects").

Ringer will interconnect at the future Vanduser switching station on the Morely-Stoddard 161 kV transmission line;

- Authority under Section 393.190.1 to complete the mergers under the BTAs for the Solar Projects described later in this Application and in the Direct Testimony of Company witness Scott Wibbenmeyer, and a determination that doing so is not detrimental to the public interest;
- A variance from the requirement in 20 CSR 4240-20.045(5)(D) and 20 CSR 4240-20.045(3)(C) so that as-built drawings for the BESS Projects and the Solar Projects can be supplied after exercise of authority under the CCN consistent with the condition related to as-built drawings adopted by the Commission in File Nos. EA-2023-0286 and EA-2025-0239;
- A variance from the requirement in 20 CSR 4240-20.045(6)(J) so that the Company's plans for restoration of safe and adequate service can be provided closer to the time when the BESS Projects and Solar Projects will commence commercial operation, also consistent with the condition relating to this requirement adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239;
- Establishment of a prehearing conference immediately upon the expiration of the deadline for applications to intervene to establish a procedural schedule to facilitate the issuance of a Commission order granting the relief requested in this *Application* by November 30, 2026; and
- For such other and further relief as may be appropriate.

Testimony in support of this Application is being provided by the following:

<b>Witness</b>	<b>Subject Matter</b>
Robert B. Dixon Vice President, Regulatory and Legislative Affairs	Filing overview, including how the five Projects will support the Company's service obligation to all of its customers and an update on Company economic development efforts.
Scott Wibbenmeyer Senior Director, Renewable Business Development and Acquisitions	Overall descriptions of each Project, including technical aspects, purchasing, site selection, etc.
Steven M. Wills Senior Director, Regulatory Affairs	Addresses how the Projects meet the <i>Tartan</i> factors and Satisfaction of Conditions from Prior Commission Order relating to Certain CCN Applications.
Mitchell Lansford Vice President and Treasurer	Describes the plans for the financing of the Projects.
Matt Michels Director, Corporate Analysis	Outlines the drivers of the need for the Projects and how they relate to the Company's Preferred Resource Plan ("PRP").
Andrew M. Meyer Senior Director, Energy Management and Trading	Discusses benefits of the Projects in the Midcontinent Independent System Operator, Inc. ("MISO") market.
Harman Ormani Project Manager	Describes the Quinn Switching Station for the Millcreek BESS Project.

In support of the above requests, Applicant states as follows:

## **I. APPLICANT**

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103.

The Applicant is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission.<sup>3</sup> There is already on file with the Commission a certified copy of Applicant's Articles of Incorporation (*see* Case No. EA-87-105), which is incorporated herein by this reference. The Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office is attached hereto as *Application Schedule A*. A Certificate of Corporate Good Standing for Applicant is attached as *Application Schedule B*.

2. Filings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and to:

Steven M. Wills  
Senior Director, Regulatory Affairs  
Ameren Missouri  
1901 Chouteau Avenue  
P.O. Box 66149  
St. Louis, MO 63166-6149  
[swills@ameren.com](mailto:swills@ameren.com)

3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

4. The Applicant has no overdue annual report or assessment fees.

5. Applicant filed its 60-day notice with respect to the authority sought herein, pursuant to 20 CSR 4240-4.017(1), on January 16, 2026, and the filing was assigned the above-captioned file number.

6. Applicant requests a prehearing conference be established immediately upon the expiration of the deadline for applications to intervene to establish a procedural schedule to

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<sup>3</sup> Ameren Missouri is an "electrical corporation" and a "public utility" as defined in Subsections 386.020(15) and (43), RSMo (2016). According to Subsections 393.170.1 and .2, RSMo, an electrical corporation may not construct electrical plant, with the exception of an energy generation unit of one megawatt or less, without first obtaining the permission and approval of this Commission.

facilitate the issuance of a Commission order granting the relief requested in this *Application* by November 30, 2026 to meet contractual, construction, and/or in-service deadlines for the respective Projects.

**II. REQUEST FOR CCNs FOR THE BESS PROJECTS UNDER SECTION 393.170.1, RSMo**

7. The Applicant requests CCNs for each of the three BESS Projects: the Castle Bluff BESS Project, Huck Finn BESS Project, and Millcreek BESS Project. In total, the BESS Projects represent a total of 545 MW<sub>AC</sub> of battery nameplate capacity. Table 1 below summarizes the BESS Projects.

**Table 1. Summary of BESS Projects**

	Castle Bluff BESS	Huck Finn BESS	Millcreek BESS
<b>Facility Size</b>	95 MW-ac	200 MW-ac	250 MW-ac
<b>Location</b>	St. Louis County, MO	Audrain County, MO	Lincoln County, MO
<b>Tax Strategy</b>	ITC	ITC	ITC
<b>Expected Tax</b> <sup>4</sup>	40%	30%	30%
<b>Land Under Control</b>	10 Acres	22 Acres	24 Acres
<b>Interconnection Path</b>	Replacement Interconnection	Surplus Interconnection	Expedited Resource Addition Study Process
<b>Interconnection Status</b>	Generator Interconnection Agreement Executed	Surplus Interconnection Application Filed – Awaiting Study Results	Expedited Generation Interconnection Agreement Executed
<b>Interconnection Voltage</b>	138-kV Transmission	345-kV Transmission	161-kV Transmission
<b>Expected In-service Date</b>	Q2 2028	Q2 2028	Q2 2028
<b>Base Case Cost Estimate</b>	*** _____ ***	*** _____ ***	*** _____ ***

Additional details regarding each of the BESS Projects are provided in the Direct Testimony of Ameren Missouri witness Scott Wibbenmeyer and details relating to the interconnection of the Millcreek BESS Project are provided in the Direct Testimony of Company witness Harman Ormani.

**A. Project Description – Castle Bluff BESS Project**

8. The Castle Bluff BESS Project is a 95 MW, four-hour lithium iron phosphate BESS facility located on approximately 10 acres within the same parcel of land as the now-retired

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<sup>4</sup> The Company is currently pursuing eligibility for an additional 10% Domestic Content Bonus for all three BESS Projects, which would result in an expected tax benefit of 50% for Castle Bluff BESS, 40% for Huck Finn BESS and 40% for Millcreek BESS.

Meramec Energy Center and the to-be-constructed Castle Bluff simple cycle CTG energy center previously approved by the Commission in File No. EA-2024-0237. As explained in Mr. Wibbenmeyer's Direct Testimony, the BESS Project will consist of approximately 92 battery enclosure skids, each of which will be made up of battery modules and support equipment housed in specially designed, outdoor rated enclosures. The BESS Project will be interconnected appropriately to other battery enclosures and wired to transformers to step up the 480 volt battery skid output voltage to 34.5 kV, which will then be routed to the new generator step-up ("GSU") transformers, increasing the voltage to 138 kV before the site is interconnected through a short lead-line to the point of interconnection within Ameren Missouri's existing transmission substation. The facility will be capable of being monitored and controlled through the Company's Supervisory Control and Data Acquisition ("SCADA") system, allowing full remote operations to charge or dispatch the facility, similar to Ameren Missouri's other renewable and gas turbine operations.

9. Ameren Missouri will construct, install, own, operate, and maintain this BESS Project, which will improve system reliability, support renewable energy integration, reduce reliance on fossil fuels, and enhance overall grid stability and flexibility. The Castle Bluff BESS Project will provide Ameren Missouri with inherent operational flexibility and fast response, allowing the Company to meet its load needs in times of high demand, especially during critical peak periods, similar to a CTG.

10. Ameren Missouri determined that Meramec was the best site for the BESS Project by first focusing on properties it already owned. Meramec provided several advantages over other existing sites. For instance, the site's overall layout and available land in proximity to the substation were important factors, as was the ability to utilize Meramec's interconnection rights

without the risks or additional costs associated with a full MISO generation interconnection process. Finally, the site location also made financial sense because this location qualifies for an additional 10% Energy Community Tax Credit Bonus under the Inflation Reduction Act of 2022 ("IRA").

11. As described in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri relied on a competitive bidding process for EPC and equipment supply for the BESS Projects.

12. Construction is anticipated to commence in Q1 2027 and this BESS Project is anticipated to be completed and placed in-service in Q2 2028.

**B. Project Description – Huck Finn BESS Project**

13. The Huck Finn BESS Project is a 200 MW, four-hour lithium iron phosphate BESS facility located on approximately 22 acres within the same parcel of land as the Company's Audrain CTG energy center. As explained in Mr. Wibbenmeyer's Direct Testimony, the BESS Project will consist of approximately 192 battery enclosure skids, each of which will be made up of battery modules and support equipment housed in specially designed, outdoor rated enclosures. This BESS Project will be interconnected appropriately to other battery enclosures and wired to transformers to step up the 480 volt battery skid output voltage to 34.5 kV, which will then be routed to the new GSU transformers, increasing the voltage to 345 kV before the site is interconnected through a short lead line to the existing Ameren Missouri Huck Finn Solar generator tie line. Connecting in this manner allows the Huck Finn BESS Project to share the point of interconnection with Huck Finn Solar at the existing Ameren Missouri Spencer Creek switching station.

14. Ameren Missouri will construct, install, own, operate, and maintain this BESS Project, which will improve system reliability, support renewable energy integration, reduce

reliance on fossil fuels, and enhance overall grid stability and flexibility. The Huck Finn BESS Project will provide Ameren Missouri with inherent operational flexibility and fast response, allowing the Company to meet its load needs in times of high demand, especially during critical peak periods, similar to a CTG.

15. Ameren Missouri determined that the Audrain CTG parcel was the best site for this BESS Project by first focusing on properties it already owned. Audrain provided several advantages over other existing Company-owned sites. The site's overall layout and available land in proximity to the substation were important factors, as was the ability to utilize Huck Finn Solar's interconnection rights without the risks or additional costs associated with a full MISO generation interconnection process.

16. As described in Wibbenmeyer's Direct Testimony, Ameren Missouri relied on a competitive bidding process for EPC and equipment supply for the BESS Projects.

17. Construction is anticipated to commence in Q1 2027 and this BESS Project is anticipated to be completed and placed in-service in Q2 2028.

**C. Project Description – Millcreek BESS Project**

18. The Millcreek BESS Project is a 250 MW, four-hour lithium iron phosphate BESS facility located on approximately 24 acres, for which the Company holds a five-year purchase option whereby the Company will close on the real estate upon receipt of CCN approval. The facility will consist of approximately 240 battery enclosure skids. On site, the battery skids will be placed on newly installed foundations, interconnected appropriately to other battery enclosures and wired to transformers to step up the 480-volt battery skid output voltage to 34.5 kV. The 34.5 kV output will then be routed to the new GSU transformers, increasing voltage to 161 kV before the site is interconnected through a short lead line to the point of

interconnection at a to-be-constructed Ameren Missouri Quinn Switching Station. The facility will be capable of being monitored and controlled through the Company's SCADA system, allowing full remote operations to charge or dispatch the facility, similar to Ameren Missouri's other renewable and gas turbine operations.

19. Ameren Missouri will construct, install, own, operate, and maintain this BESS Project, which will improve system reliability, support renewable energy integration, reduce reliance on fossil fuels, and enhance overall grid stability and flexibility. The Millcreek BESS Project will provide Ameren Missouri with inherent operational flexibility and fast response, allowing the Company to meet its load needs in times of high demand, especially during critical peak periods, similar to a CTG.

20. Ameren Missouri determined that the site was the best site for the BESS Project because it is a greenfield site for which Ameren Missouri currently holds purchase options. Additionally, the site represents a unique opportunity to utilize the new MISO Expedited Resource Addition Study ("ERAS") process to obtain a GIA in as little as three to four months, avoiding the risk of a queue position extending the Project timeline and increasing costs.

21. As described in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri relied on a competitive bidding process for EPC and equipment supply for the BESS Projects.

22. Construction is anticipated to commence in Q1 2027 and this BESS Project is anticipated to be completed and placed in-service in Q2 2028.

**D. The BESS Projects are Necessary or Convenient for the Public Service (“Tartan Factors”)**

23. The Commission traditionally analyzes an application for a CCN using the following factors:

- a. Need for the Project;

- b. Economic Feasibility of the Project;
- c. Ability of the Applicant to Finance the Project;
- d. Qualifications of the Applicant to Construct the Project; and
- e. Whether the Project is in the Public Interest.

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.<sup>5</sup>

**a. The BESS Projects are needed.**

24. The BESS Projects are needed for several reasons as described in the Direct Testimonies of Company witnesses Matt Michels, Robert B. Dixon, and Steven M. Wills. First, they are expected to provide 545 MW of year-round available capacity and energy to meet Ameren Missouri customers' needs. As addressed in the Direct Testimony of Mr. Michels, the BESS Projects are called for by the Company's 2025 Preferred Resource Plan submitted in File No. EO-2025-0235 as part of the addition of dispatchable resources, as is the case with the Castle Bluff and Big Hollow CTGs and Big Hollow BESS, previously approved by the Commission in File Nos. EA-2024-0237 and EA-2025-0238, respectively.

25. More specifically, the 545 MW of battery energy storage that the Company seeks authorization for in this filing represents a portion of the 1,000 MW of battery energy storage proposed to be installed by 2030, as outlined in the Company's 2025 Preferred Resource Plan. As described in Mr. Michels' Direct Testimony, these BESS Projects support the Company's overall supply-side plan (as set out in File No. EO-2025-0235), which relies on a least-cost mix of low- and zero-carbon generation resources to replace the energy being lost as aging, coal-fired

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<sup>5</sup> While a project is not required as a matter of law to meet the "Tartan Factors," the Commission has traditionally analyzed CCN applications using those factors. See *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173, 177 & 189 (1994) (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. at 561).

generation resources retire, as well as mitigating the myriad risks associated with its reliance on aging fossil-fueled generation, while adding appropriate dispatchable resources like the Castle Bluff and Big Hollow CTGs and, more relevantly, the BESS Projects. With the recent execution of electric service agreements representing 2.8 GW, and the prospect of continued large load customer growth in the state of Missouri, the need for new capacity will be discussed in more detail in the Company's next Integrated Resource Plan filing, which will be filed by October 1, 2026.

26. In sum, the proposed BESS Projects bring many system and customer benefits that justify their costs, particularly in this era of growth.

**b. The BESS Projects are economically feasible.**

27. As outlined in greater detail in the Direct Testimonies of Company witnesses Mr. Dixon, Mr. Wills, and Mr. Michels, the BESS Projects are appropriate based on various indicia of economic feasibility identified by the Commission in prior CCN cases, including,

- The BESS Projects meet the identified needs in a cost-effective manner given that battery storage generation provides dispatchable, flexible attractively-priced generation up to capacities well in excess of the 545 MW of BESS for which approval is sought in this case, as discussed in Mr. Michels' Direct Testimony.
- As the Commission has recognized, since the BESS Projects are needed, economic feasibility generally turns on the Company's ability to finance the Project, which is addressed below.
- The BESS Projects are part of the Company's 2025 PRP, which is demonstrated to meet the Company's needs at a lower net present value of revenue requirements ("NPVRR") than alternatives to doing so.

- By taking advantage of the existing valuable interconnection rights at the Meramec and Huck Finn sites and by participating in the MISO ERAS process in the case of the Millcreek BESS Project, the BESS Projects are not subject to costly interconnection upgrades and schedule delays that otherwise would likely exist due to MISO's traditional time-intensive interconnection process.
- By primarily utilizing property that the Company currently owns, acquisition costs for the real property necessary for the Projects are minimal.
- The BESS Projects will create jobs and tax revenues within the state and within the Company's service territory, which contributes to the BESS Projects' economic feasibility.

28. Further, Ameren Missouri expects that the BESS Projects will be eligible for the 30% Investment Tax Credit ("ITC") provided in the IRA.<sup>6</sup> The Castle Bluff BESS Project is also expected to qualify for an additional 10% Energy Community tax credit bonus since it directly adjoins a census tract with a qualifying coal-fired electric generating unit retirement and could potentially qualify for the additional 10% Domestic Content bonus. These tax credit incentives can be stacked with the 30% ITC, resulting in a total potential 50% ITC for the Castle Bluff BESS Project. Similarly, it is possible that the Huck Finn and Millcreek BESS Projects will also qualify for the 10% Domestic Content bonus, thereby allowing them to receive up to a 40% ITC.

**c. Ameren Missouri has the ability to finance the BESS Projects.**

29. As Company witness Mitchell Lansford discusses in his Direct Testimony, Ameren Missouri has the financial ability to construct the BESS Projects because it can access the equity

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<sup>6</sup> This is consistent with Paragraph 5.j. of the Unanimous Stipulation and Agreement in File No. EA-2024-0237, which requires that Ameren Missouri, in a CCN application seeking permission to build 200 MW of BESS at a former coal plant site (or part of the BESS capacity at one site and part at another), seek both the storage ITC and the Energy Community tax credit adder to help finance the project.

and debt capital necessary to do so while maintaining a strong financial position and strong underlying financial metrics.

30. In total, the BESS Projects have an accumulated estimated base total capital cost of approximately \*\*\* \_\_\_\_\_ \*\*\* and a risk-adjusted cost estimate of approximately \*\*\* \_\_\_\_\_ \*\*\*. As Mr. Lansford's Direct Testimony discusses, Ameren Missouri expects to finance the BESS Projects through a mix of long-term debt and equity in line with current capitalization ratios utilized in developing revenue requirements for ratemaking purposes. The Company will file an appropriate application for approval of any such debt issuances required.

31. Moreover, the Company has sufficient access to long-term capital markets based on, among other things, its stable issuer credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies, respectively.

**d. Ameren Missouri is qualified to construct the BESS Projects.**

32. As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri is a well-established electric utility with extensive experience in constructing and operating various types of generation projects. The Company currently manages a diverse portfolio of generation facilities that includes fifteen solar facilities, twelve simple cycle combustion turbine facilities, two wind facilities, two coal-fired centers, three hydro-electric sites, and one nuclear power energy center. The knowledge and skills developed through our existing projects translate seamlessly to BESS development, construction and operation, which includes project management expertise, contract management and negotiation, engineering and design, and operations and maintenance. The Company has a proven track record of incorporating innovative solutions, such as deploying renewable energy projects, and is well positioned to embrace battery technology.

**e. The BESS Projects are in the public interest.**

33. As discussed in Mr. Wills' Direct Testimony, ownership of the BESS Projects promotes the public interest because, in addition to the fact that it meets the first four *Tartan* factors, the BESS Projects enhance the reliability, affordability, and sustainability of Ameren Missouri's generation system for the benefit of its customers. The BESS Projects are an integral part of the Company's dispatchable resource buildout necessary to discharge its obligation to provide service to all of its customers, including customer growth from large load customers or otherwise, which in turn supports the state's efforts to attract economic development opportunities to the state, for the benefit of all Missourians.

**E. Other Filing Requirements for BESS Projects**

**a. Castle Bluff BESS Project**

34. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following:

a. The BESS Project site, located at the former Meramec Energy Center site in St. Louis County, Missouri, is depicted in Schedule SW-D2 attached to Mr. Wibbenmeyer's Direct Testimony (20 CSR 4240-20.045(6)(A));

b. There are no items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the BESS Project site;

c. In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for the BESS Project is described in Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for the Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) The BESS Project is estimated to cost approximately \*\*\* \_\_\_\_\_  
\_\_\_\_\_\*\*\*;

(iv) The operational features of the asset once it is fully operational and used for service are discussed by Mr. Wibbenmeyer in his Direct Testimony;

d. Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028 (20 CSR 4240-20.045(6)(D));

e. The water system will be treated as common plant with the Castle Bluff CTG Project previously approved by the Commission in File No. EA-2024-0237 (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing the BESS Project are discussed in Mr. Lansford's Direct Testimony (20 CSR 4240-20.045(6)(F));

g. The BESS Project is contemplated by the Company's 2025 PRP as explained in the Mr. Michels Direct Testimony (20 CSR 4240-20.045(6)(G));

h. As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract. Ameren Missouri relied on a competitive bidding process for the EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer's Direct Testimony. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials (20 CSR 4240-20.045(6)(H));

i. The BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation is operated. More specifically, this

BESS Project will be operated by Ameren Missouri's Energy Management & Trading group, similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with MISO, of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J), allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that this BESS Project is placed in-service and final plans sixty (60) days after the Project is placed in-service; and

k. There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company owns the land on which this BESS Project will be constructed so no landowners will be directly affected.

**b. Huck Finn BESS Project**

35. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following:

a. This BESS Project site, located on the Audrain CTG energy center parcel in Audrain County, Missouri, is depicted in detail in Schedule SW-D4 attached to Mr. Wibbenmeyer's Direct Testimony (20 CSR 4240-20.045(6)(A));

b. Items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the Project site are identified in Schedule C to this Application;

c. In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for this BESS Project is described in Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for this BESS Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) This BESS Project is estimated to cost approximately \*\*\* \_\_\_\_\_  
\_\_\_\_\_\*\*\*;

(iv) The operational features of the asset once it is fully operational and used for service are discussed by Mr. Wibbenmeyer in his Direct Testimony;

d. Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028 (20 CSR 4240-20.045(6)(D));

e. At this time, no common plant is anticipated for the Project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing this BESS Project are discussed in the Mr. Lansford's Direct Testimony (20 CSR 4240-20.045(6)(F));

g. This BESS Project is contemplated by the Company's 2025 PRP as explained in Mr. Michels' Direct Testimony (20 CSR 4240-20.045(6)(G));

h. As explained in the Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract. Ameren Missouri relied on a competitive bidding process for EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer's Direct Testimony. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials (20 CSR 4240-20.045(6)(H));

i. This BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation is operated. More specifically, the

BESS Project will be operated by Ameren Missouri's Energy Management & Trading group, similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with the MISO, of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that this BESS Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service; and

k. There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company owns the land on which this BESS Project will be constructed so no landowners will be impacted.

c. **Millcreek BESS Project**

36. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following:

a. The BESS Project site, located in Lincoln County, Missouri, is depicted in detail in Schedule SW-D6 attached to Mr. Wibbenmeyer's Direct Testimony (20 CSR 4240-20.045(6)(A));

b. Items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the Project site are identified in *Application Schedule D*;

c. In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for this BESS Project is described in Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for this BESS Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) The BESS Project is estimated to cost approximately \*\*\* \_\_\_\_\_  
\_\_\_\_\_\*\*\*;

(iv) The operational features of the asset once it is fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony;

d. Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028 (20 CSR 4240-20.045(6)(D));

e. At this time, no common plant is anticipated for the Project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing this BESS Project are discussed in the Mr. Lansford's Direct Testimony (20 CSR 4240-20.045(6)(F));

g. The BESS Project is contemplated by the Company's 2025 PRP as explained in the Mr. Michels' Direct Testimony (20 CSR 4240-20.045(6)(G));

h. As explained in the Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract.<sup>7</sup> Ameren Missouri relied on a competitive bidding process for the EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer's Direct Testimony. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials (20 CSR 4240-20.045(6)(H));

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<sup>7</sup> The Company will continue to evaluate whether to include the battery equipment in the EPC's scope and if more economical, could decide to procure the equipment itself.

i. This BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation is operated. More specifically, the BESS Project will be operated by Ameren Missouri's Energy Management & Trading group, similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with the MISO, of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that this BESS Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service; and

k. There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company has already obtained all necessary land rights for the land on which the BESS Project will be constructed.

37. As required by ¶ 5(o) of the Stipulation and Agreement entered and approved in File No. EA-2023-0286, Ameren Missouri:

a. Through Mr. Michels' Direct Testimony, is providing the information required by subsections i and ii;

b. Through the Direct Testimonies of Mr. Michels, Mr. Dixon, and Mr. Wills , is providing testimony regarding what needs the BESS Projects address, whether qualitative or quantitative, as well as the timing of those needs, as required by subsection iii;

b. Through Mr. Wills' Direct Testimony, is confirming that there are no regulatory treatments implicated by this filing, as required by subsection iv; and

c. As described in this Application with reference to the Direct Testimonies of Ameren Missouri witnesses testimony and more specifically discussed in Mr. Wills' Direct Testimony, is addressing questions 1-10, as required by subsection v.

### **III. REQUEST FOR CCNs FOR THE RENEWABLE GENERATION PROJECTS UNDER SECTION 393.170.1<sup>8</sup> AND FOR SECTION 393.190.1 AUTHORITY**

38. Applicant also requests CCNs for the two Solar Projects: the Tom Sawyer Solar Project and the Ringer Solar Project. In total, the Solar Projects reflect a total of 400 MW<sub>AC</sub> of solar nameplate capacity.

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<sup>8</sup> The Company requests permission and authority to construct the Project via the BTA structure discussed herein, consistent with the permission and authority the Commission granted it for its prior renewable generation projects constructed using a BTA structure. The Company notes, however, that this Application could be viewed as an application to operate an existing asset under 20 CSR 4240-20.045(5) which was adopted pursuant to subsection 2 of section 393.170. Should the Commission view it as such, the Company requests that permission to operate it in lieu of, or in addition to, the permission sought under 20 CSR 4240-20.045(6) and Section 393.170.1.

**Table 2. Summary of the Solar Projects**

	Tom Sawyer Solar	Ringer Solar
<b>Facility Size</b>	175 MW-ac	225 MW-ac
<b>Location</b>	Audrain County, MO	Stoddard County, MO
<b>Agreement Type</b>	Build-transfer	Build-transfer
<b>Agreement Date</b>	March 2026	May 2026
<b>Developer</b>	EDF power solutions Development, Inc.	Invenergy Renewables Global, LLC.
<b>Approximate Annual Energy Production (MWh)</b>	380,000	490,000
<b>Tax Strategy</b>	ITC	ITC
<b>Expected Tax <sup>9</sup></b>	30%	30%
<b>Land Under Control</b>	1200 Acres	3900 Acres
<b>Interconnection Status</b>	Generator Interconnection Application Filed	Generator Interconnection Agreement Executed
<b>Interconnection Voltage</b>	345-kV Transmission	161-kV Transmission
<b>Expected In-service Date</b>	Q4 2028	Q2 2029
<b>Base Case Cost Estimate</b>	*** _____ ***	*** _____ ***

Additional details regarding each Project are provided in the Direct Testimony of Ameren Missouri witness Scott Wibbenmeyer.

<sup>9</sup> The Company is currently pursuing eligibility for an additional 10% Domestic Content Bonus for both Solar Projects, which would result in an expected tax benefit of 40% for Tom Sawyer Solar and 40% for Ringer Solar.

**A. Project Description – Tom Sawyer Solar Project**

39. The Tom Sawyer Solar Project is a 175 MW solar generation facility to be constructed in Audrain County, Missouri, approximately three miles from the Vandalia Solar Energy Center. The Tom Sawyer Solar Project will be located on a footprint of approximately 1,200 acres of agricultural land presently under lease, easement, or purchase option by EDF power solutions Development, Inc. ("EDF"), that is adjacent to the Huck Finn Solar Energy Center. The Tom Sawyer Solar Project includes an approximately two-mile generator lead-line and will interconnect to Ameren Missouri's existing Spencer Creek 345 kV switching station via a 345 kV lead-line shared with Huck Finn.

40. The Tom Sawyer Solar Project is being constructed under a BTA, much like the structure used for the previously approved Split Rail, Huck Finn, and Boomtown solar projects. The Tom Sawyer Solar Project is needed to provide reliable service to all of our customers. The Tom Sawyer Solar Project is an important component in continuing to develop a balanced supply-side portfolio to meet customer needs. Ameren Missouri expects that Tom Sawyer will serve Ameren Missouri's customers and that it will be included in the Company's rate base and its prudently incurred costs will be reflected in retail rates.

41. As explained in Mr. Wibbenmeyer's Direct Testimony, the Tom Sawyer Solar Project consists of a solar generation plant using ground-mounted, tracking photovoltaic ("PV") panels and associated facilities with a capacity of 175 MW with an estimated first-year annual energy production of approximately 380,000 MW-hours ("MWh") and will be built to Ameren Missouri specifications with an expected asset life for the solar facility itself of 30 years or more.

42. The solar facility will be constructed by a wholly owned subsidiary of EDF power solutions Development, Inc. and will be acquired by Ameren Missouri after construction through

a BTA. As noted in the BTA, EDF, through a special purpose entity known as Tom Sawyer Solar, LLC, is developing the Project and, upon its completion, will sell its 100% interest to Ameren Missouri. EDF is the same renewable energy generation developer that developed the Huck Finn solar project, which was approved by the Commission in February 2023 in File No. EA-2022-0244.

43. Prior to Ameren Missouri's purchase of Tom Sawyer Solar, LLC and, ultimately, completion of the above-described merger, to minimize property taxes arising from ownership and operation of the Tom Sawyer Solar Project, Tom Sawyer Solar, LLC pursued a Chapter 100 financing arrangement with Audrain County, Missouri. This is the same structure utilized for Ameren Missouri's existing Audrain Energy Center, Peno Creek Energy Center, Split Rail Solar Energy Center, Huck Finn Solar Energy Center, Vandalia Solar Energy Center, and Bowling Green Solar Energy Center. A Chapter 100 arrangement, so named because it is authorized by Chapter 100 of the Revised Statutes of Missouri, allows facilities to make payments in lieu of property taxes ("PILOTS") to the county since title to the subject facility will be owned by a tax-exempt entity – in this case, Audrain County. These PILOTS, however, are in amounts much lower than the actual taxes that would be paid if the facility was not tax exempt, leading to higher revenue for the local jurisdiction but lower overall property tax expense for Ameren Missouri customers.

44. To implement the arrangement, the county owns the facility, but then leases it back to Tom Sawyer Solar, LLC. Tom Sawyer Solar, LLC has (and ultimately, Ameren Missouri will have) full rights to control and operate the facility.

45. At the conclusion of the Chapter 100 arrangement, the Company will pay the county a specified sum, ending the Chapter 100 arrangement and vesting title to the Tom Sawyer assets to Ameren Missouri. The entire Ameren Missouri investment in Tom Sawyer will be

reflected as plant-in-service on Ameren Missouri's books. This is the same treatment as given for the Company's other Chapter 100 generating facilities.

46. Construction of Tom Sawyer is anticipated to commence in the second quarter of 2027 and is anticipated to be completed and placed in-service by the fourth quarter of 2028.

**B. Project Description – Ringer Solar Project**

47. The Ringer Solar Project is a 225 MW solar generation facility to be constructed in Stoddard County, Missouri. The Ringer Solar Project will be located on a footprint of approximately 3,900 acres of agricultural land presently under lease, easement, or purchase option by the special purpose entity, Ringer Solar Energy LLC, a wholly owned subsidiary of Ringer Solar Holdings LLC, which is wholly owned by Invenenergy Renewables Global LLC ("Invenenergy"). The Ringer Solar Project will interconnect to Ameren Missouri's future Vanduser Switch Station on the Morley-Stoddard 161kV transmission line. The Company was previously granted a CCN for the future Vanduser Switching Station in File No. EA-2026-0018.

48. The Ringer Solar Project is being constructed under a BTA, much like the structure used for the previously approved Split Rail, Huck Finn, and Boomtown solar projects. The Ringer Solar Project is needed to provide reliable service to all of our customers. The Ringer Solar Project is an important component in continuing to develop a balanced supply-side portfolio to meet customer needs. Ameren Missouri expects that the Ringer Solar Project will serve Ameren Missouri's customers and that it will be included in the Company's rate base and its prudently incurred costs will be reflected in retail rates.

49. As explained in Mr. Wibbenmeyer's Direct Testimony, the Ringer Solar Project consists of a solar generation plant using ground-mounted, tracking PV panels and associated facilities with a capacity of 225 MW with an estimated first-year annual energy production of

approximately 490,000 MWh and will be built to Ameren Missouri specifications with an expected asset life for the solar facility itself of 30 years or more.

50. The solar facility will be constructed by a wholly owned subsidiary of Invenergy and will be acquired by Ameren Missouri after construction through a BTA. As noted in the BTA, Invenergy, through a special purpose entity known as Ringer Solar Energy, LLC, is developing the Project and, upon its completion, will sell its 100% interest to Ameren Missouri. Invenergy is the same renewable energy generation developer that developed the Split Rail Solar Energy Center, which was approved by the Commission in File No. EA-2023-0286.

51. Prior to Ameren Missouri's purchase of Ringer Solar Energy, LLC and ultimately completion of the above-described merger, to minimize property taxes arising from ownership and operation of the Ringer Solar Project, Ringer Solar Energy, LLC is pursuing a Chapter 100 financing arrangement with Stoddard County, Missouri. This is the same structure pursued for the Tom Sawyer Solar Project and utilized for Ameren Missouri's existing Audrain Energy Center, Peno Creek Energy Center, Split Rail Solar Energy Center, Huck Finn Solar Energy Center, Vandalia Solar Energy Center, Split Rail Solar Energy Center, and Bowling Green Solar Energy Center.

52. To implement the arrangement, the county must own the facility, but then leases it back to Ringer Solar Energy, LLC. Ringer Solar Energy, LLC will have (and ultimately, Ameren Missouri will have) full rights to control and operate the facility.

53. At the conclusion of the Chapter 100 arrangement, the Company will pay the county a specified sum, ending the Chapter 100 arrangement and vesting title to the Ringer assets to the Ameren Missouri. The entire Ameren Missouri investment in the Ringer Solar Project will

be reflected as plant-in-service on Ameren Missouri's books. This is the same treatment as given for the Company's other Chapter 100 generating facilities.

54. Construction of the Ringer Solar Project is anticipated to commence in March of 2027 and is anticipated to be completed and placed in-service in Q2 2029.

**C. The Solar Projects are Necessary or Convenient for the Public Service (“Tartan Factors”)**

55. As previously noted in this Application, the Commission traditionally analyzes an application for a CCN<sup>10</sup> using the following factors:

- a. Need for the Project;
- b. Economic Feasibility of the Project;
- c. Ability of the Applicant to Finance the Project;
- d. Qualifications of the Applicant to Construct the Project; and
- e. Whether the Project is in the Public Interest.

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.<sup>11</sup>

**a. The Solar Projects are needed.**

56. The Solar Projects are needed for several reasons as described in the Direct Testimonies of company witnesses Mr. Michels, Mr. Dixon, Mr. Wibbenmeyer, and Mr. Wills. As addressed in the direct testimonies of Mr. Michels, Mr. Wibbenmeyer, and Mr. Dixon, the Solar Projects are called for by the Company’s 2025 PRP submitted in File No. EO-2025-0235 and part of Ameren Missouri’s long-term plan to continue to transition a portion of its generating fleet to least-cost renewable energy resources to fulfill its customers’ energy needs through the use of

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<sup>10</sup> See footnote 5 above.

<sup>11</sup> *Id.* at 189 (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. at 561).

clean, zero-fuel cost generation resources, together with additional dispatchable generation and battery energy storage systems. Renewable energy generation is also vital to the region's economic development, including to keep existing customers in Ameren Missouri's service territory or to attract new or expanded loads. This will also be an important generation addition that will help the Company serve the recently announced 2.8 GW of new large load coming to our service territory in a tremendous economic development opportunity for the State of Missouri. Moreover, as discussed by Mr. Wills in his Direct Testimony, increased electric demand from large loads connecting to the system will likely increase the Company's Missouri RES requirements (or large load customers may participate in Rider RSP-LLC), in both cases substantially increasing the Company's need for renewable energy credits, which both facilities can provide. Renewable generation also mitigates risks associated with environmental regulation and other factors that may significantly impact the costs and benefits of coal-fired generation. The Solar Projects will also promote the public policy of this state, as recognized by the Commission, by continuing to diversify the energy supply and to gain other benefits renewable generation provides to the public. The Solar Projects will also take advantage of valuable tax credits that are currently available and provide energy and capacity in all seasons.

57. More specifically, the 400 MW of new solar generation that the Company seeks authorization for in this filing represents less than 19% of the 2,200 MW additional new renewable generation proposed to be installed by 2030, as outlined in the Company's recent resource planning filings. As described in Mr. Michels' Direct Testimony, the Solar Projects support the Company's overall generation transition plan (as set out in File No. EO-2024-0020) and its new PRP (see File No. EO-2025-0235), which relies on a least-cost mix of low- and zero-carbon generation resources

to replace the energy being lost as aging, coal-fired generation resources retire, as well as mitigating the myriad risks associated with over-reliance on fossil-fueled generation.

58. In summary, the proposed Solar Projects are generation investments that justify the costs.<sup>12</sup>

**b. The Solar Projects are economically feasible.**

59. The Solar Projects are also economically feasible. As outlined in greater detail in Mr. Michels', Mr. Wibbenmeyer's, and Mr. Wills' Direct Testimonies, the Solar Projects are economically feasible based on various indicia of economic feasibility identified by the Commission in prior CCN cases, including as demonstrated by the substantially lower net present value of revenue requirement of the Company's 2025 PRP – of which the Solar Projects are included – as compared to the alternative. As discussed above and in Mr. Lansford's Direct Testimony, the Company is able to finance the Solar Projects, which is a key indicium of economic feasibility that the Commission relies on in applying this *Tartan* Factor.

60. Taking advantage of the tax incentives currently available under the IRA further contributes to the economic feasibility of the Solar Projects. Among its many impacts, the IRA extensively modifies provisions of the tax code for renewable energy projects. The IRA extends both the ITC and production tax credit ("PTC"), creates additional wage and apprentice requirements that projects must meet to qualify for the full ITC or PTC value, and adds additional bonus credit amounts for domestic content and for projects located in an energy community (i.e., a brownfield site, retired coal generating site or an area with significant previous employment related to oil, gas, or coal activities).

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<sup>12</sup> *Id.*

61. Ameren Missouri expects that the Solar Projects will be eligible for 100% PTC or the 30% investment tax credit ITC provided in the IRA, as modified by the subsequent One Big Beautiful Bill Act ("OBBBA"). Mr. Wibbenmeyer discusses the Solar Projects' tax credit qualifications in his Direct Testimony.

62. In addition to the above, by utilizing the BTA arrangement with EDF and Invenergy for the development of the Tom Sawyer Solar and Ringer Solar Projects, respectively, Ameren Missouri will minimize risk and capitalize on the vast experience and equipment purchasing power EDF and Invenergy have amassed from years of installing more than 23 gigawatts and 29 gigawatts, respectively, of wind and solar projects. Furthermore, both developers will be responsible for obtaining all property and other rights for the Solar Projects, including equipment (other than Ameren Missouri-supplied equipment,). All land rights have already been acquired for both Solar Projects.

63. As described further in Mr. Wibbenmeyer's Direct Testimony, the solar projects were selected as part of a competitive bidding process to ensure that the Solar Projects' development and implementation occur at market-based pricing.

64. The Solar Projects also lessen the Company's need to rely on the MISO market, especially at peak times when costs are higher, a benefit of renewable generation projects that the Commission recognized in its *Report and Order* in File No. EA-2022-0245.<sup>13</sup>

65. Additionally, the Solar Projects will create jobs and tax revenues within the state and within the Company's service territory, which contributes to the Solar Projects' economic feasibility.

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<sup>13</sup> *Report and Order* (April 12, 2023), File No. EA-2022-0245 at 29.

**c. Ameren Missouri has the ability to finance the Solar Projects.**

66. As Mr. Lansford discusses in his Direct Testimony, Ameren Missouri has the financial ability to construct the Solar Projects because it can access the equity and debt capital necessary to do so while maintaining strong financial metrics.

67. The base case upfront capital cost of the Tom Sawyer Solar Project is estimated to be approximately \*\*\* \_\_\_\_\_ \*\*\*. The base case upfront capital cost of the Ringer Solar Project is estimated to be approximately \*\*\* \_\_\_\_\_ \*\*\*. As Mr. Lansford's Direct Testimony discusses, Ameren Missouri expects to finance the Solar Projects through a mix of long-term debt and equity in line with current capitalization ratios utilized in developing revenue requirements for ratemaking purposes. The Company will file an appropriate application for approval of any such debt required.

68. Moreover, the Company has sufficient access to long-term capital markets based on, among other things, its stable issuer credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies, respectively.

**d. Ameren Missouri is qualified to construct the Solar Projects.**

69. As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri is qualified to construct the Solar Projects through BTAs, and to operate them, given the financial, technical, and management expertise Ameren Missouri has developed over the course of its long history as a large public utility operating in the state of Missouri. As the Commission itself noted in its Order granting Ameren Missouri a CCN for solar generation facilities in Audrain and Ralls Counties, Missouri, in File No. EA-2022-0244, Ameren Missouri has been in business for over 100 years and has been granted CCNs by the Commission for many projects in the past.<sup>14</sup> Specific

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<sup>14</sup> *Order Approving Stipulation and Agreement and Granting Certificates of Convenience and Necessity* (February 8, 2023), File No. EA-2022-0244, at 4.

to the construction of solar generation facilities, Ameren Missouri has self-developed or otherwise constructed or acquired many utility-scale solar generation facilities, including the O'Fallon Renewable Energy Center, Lambert Community Solar Center, Montgomery County Community Solar Center, Boomtown Solar Energy Center, Huck Finn Solar Energy Center, Cass County Solar Energy Center, Vandalia Solar Energy Center, Split Rail Solar Energy Center, and Bowling Green Solar Energy Center. Ameren Missouri currently operates over 900 MWs of utility-scale solar generation. Additionally, the Company currently operates 700 MWs of utility-scale wind generation, including the High Prairie Wind Energy Center and the Atchison Wind Energy Center. Across all types of generation, the Company operates nearly 10 GWs of solar, wind, coal, gas, hydroelectric, and other resources. Regarding the generation lead-line and switching stations for the Solar Projects, Ameren Missouri owns and operates thousands of miles of transmission lines and the associated substations and switching stations located throughout its service territory.

**5. The Solar Projects are in the public interest.**

70. As discussed in Mr. Wills' Direct Testimony, implementation of the Solar Projects promotes the public interest, because in addition to the fact that it meets the first four *Tartan* factors, the Solar Projects allow the Company to effectively balance the three priorities that should be considered the pillars of the generation transition that the Company is undertaking and which is otherwise happening broadly across our industry: reliability, affordability, and sustainability. And as earlier noted, it will also provide renewable options for large customers moving to the State of Missouri, the potential for RECs that may be needed for future RES compliance, and more energy to serve the growing load in the Company's service territory.

71. In addition, implementation of the Solar Projects promote the public interest for the same reasons found to exist by the Commission when it approved a CCN for the Huck Finn,

Boomtown, Split Rail, Vandalia, Bowling Green, and Cass County solar projects in File Nos. EA-2022-0244, EA-2022-0245, and EA-2023-0286, respectively. These reasons include making the region more attractive to economic development, providing significant risk mitigation against the impact of current and prospective environmental regulations, and promoting state energy policy, including the state's policy to "diversify the energy supply through the support of renewable and alternative energy sources."<sup>15</sup> All this is in accordance with the Company's plan to maintain a balanced mix of dispatchable and renewable energy resources.

72. Specific to economic development objectives, availability of clean, reliable and affordable energy is an important factor in determining where businesses locate new jobs and investment. While Ameren Missouri recently announced 2.8 GW of new large load coming to the state, Missouri is still competing with other states for new jobs and investment from businesses that have large energy demands and a need for renewable energy to meet their corporate sustainability goals. Commission approval of the Solar Projects will confirm for current and prospective customers that the state is supporting Ameren Missouri's obligation to serve its customers and develop the needed generation to support reliability and resiliency.

**D. Other Filing Requirements**

**a. Tom Sawyer Solar Project**

73. As required by 20 CSR 4240-20.045(5), Ameren Missouri provides the following information:

a. The Tom Sawyer Solar Project is a 175 MW solar generation facility to be constructed in Audrain County, Missouri, approximately three miles from the Vandalia Solar Energy Center. The Project will be located on approximately 1,200 acres of

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<sup>15</sup> See, e.g., *Report and Order* (April 12, 2023), File No. EA-2022-0245, at 25.

agricultural land presently under lease, easement, or purchase option by EDF that is adjacent to the Huck Finn Solar Energy Center. The Tom Sawyer Solar Project includes an approximately two-mile generator lead-line and will interconnect to Ameren Missouri's existing Spencer Creek 345 kV switching station via a 45 kV lead-line shared with Huck Finn. The Project will use ground-mounted, tracking PV panels and associated facilities with an estimated first-year annual energy production of approximately 380,000 MWh and will be built to Ameren Missouri specifications with an expected asset life for the solar facility itself of 30 years or more (20 CSR 4240-045(5)(A));

b. The purchase price of the Tom Sawyer Solar Project under the BTA is approximately \*\*\* \_\_\_\_\_ \*\*\*,<sup>16</sup> with the final total price being subject to adjustments as set forth in the BTA. Ameren Missouri's plans for financing the operation of the Project are discussed above, as well as in the Direct Testimonies of Mr. Wibbenmeyer and Mr. Lansford (20 CSR 4240-20.045(5)(B) and (C));

c. Plans and specifications for the Tom Sawyer Solar Project are provided in the BTA documentation included with Mr. Wibbenmeyer's Direct Testimony as Exhibit A to Schedule SW-D10 (20 CSR 4240-20.045(5)(D));

74. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following information:

a. The Tom Sawyer Solar Project site, located adjacent to the Huck Finn Solar Energy Center site in Audrain County, Missouri, is depicted in and described in detail in

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<sup>16</sup> This is the cost in the base case, addressed in Mr. Wibbenmeyer's Direct Testimony. The actual cost could vary, as discussed in the same Direct Testimony.

Schedule SW-D13 attached to Mr. Wibbenmeyer's Direct Testimony (20 CSR 4240-20.045(6)(A));

b. Items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the Project site are identified in *Application Schedule E*;

c. In accordance with 20 CSR 4240-20.045(6)(C),

(1) The scope of the solar construction Project is described in Mr. Wibbenmeyer's Direct Testimony;

(2) Existing solar project specifications and existing drawings for the Tom Sawyer Solar Project can be found in Exhibit A of Schedule SW-D10 of Mr. Wibbenmeyer's Direct Testimony;

(3) The base case estimated cost of the Tom Sawyer Solar Project is approximately \*\*\* \_\_\_\_\_ \*\*\*;

(4) The operational features of the Tom Sawyer Solar Project once it is fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony;

d. Construction is expected to commence in the second quarter of 2027 after the required permits are received, and the Tom Sawyer Solar Project is expected to be placed in-service by the fourth quarter of 2028 (20 CSR 4240-20.045(6)(D));

e. The Tom Sawyer Solar Project has no common plant to be included in the construction Project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing the Tom Sawyer Solar Project are discussed in the Direct Testimony of Mr. Lansford (20 CSR 4240-20.045(6)(F));

g. The Tom Sawyer Solar Project is contemplated by the Company's 2025 Preferred Resource Plan as explained in the Direct Testimony of Mr. Michels (20 CSR 4240-20.045(6)(G));

h. As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri utilized a request for proposal process to select the Tom Sawyer Project. Because the Company is not constructing the Project itself but is contracting to acquire it through a BTA, any competitive bidding for design, engineering, procurement, construction management, and construction is the responsibility of the Project developer (20 CSR 4240-20.045(6)(H));

i. The Tom Sawyer Solar Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation and switching stations are operated, including its existing renewable generation and the associated interconnections. More specifically, the Tom Sawyer Solar Project will be operated by Ameren Missouri, with the operation of the solar facility managed by the Ameren Missouri Energy Management & Trading group, similar to the Company's other large-scale renewable generators such as the Atchison County and High Prairie Wind Energy Centers and Boomtown, Huck Finn, and Cass County Solar Energy Centers. Ameren Missouri will coordinate all operations of the solar facility with the MISO, of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. With respect to the Project, Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that the Tom Sawyer Solar Project is placed in-service and final

plans within sixty (60) days after the Project is placed in-service, as adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239; and

k. There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the BTA contractor has responsibility for, and has already procured, all necessary land rights.

75. Ameren Missouri is providing in its workpapers analyses consistent with the Third Stipulation and Agreement filed in File No. EA-2019-0021. Transmission interconnection costs are included within the base and risk-adjusted considerations for the Projects.

**b. Ringer Solar Project**

76. As required by 20 CSR 4240-20.045(5), Ameren Missouri provides the following information:

a. The Ringer Solar Project is a 225 MW solar generation facility to be constructed in Stoddard County, Missouri. The Project will be located on approximately 3,900 acres of agricultural land presently under lease, easement, or purchase option by Invenegy. The Ringer Solar Project will interconnect to Ameren Missouri's future Vanduser switching station on the Morely-Stoddard 161kV transmission line. The Project will use ground-mounted, tracking PV panels and associated facilities with an estimated first-year annual energy production of approximately 490,000 MWh and will be built to Ameren Missouri specifications with an expected asset life for the solar facility itself of 30 years or more (20 CSR 4240-045(5)(A));

b. The purchase price of the Ringer Solar Project under the BTA is approximately \*\*\* \_\_\_\_\_ \*\*\*,<sup>17</sup> with the final total price being subject to

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<sup>17</sup> This is the cost in the base case, addressed in Mr. Wibbenmeyer's Direct Testimony. The actual cost could vary, as discussed in the same Direct Testimony.

adjustments as set forth in the BTA. Ameren Missouri's plans for financing the operation of the Project are discussed above, as well as in the Direct Testimonies of Mr. Wibbenmeyer and Mr. Lansford (20 CSR 4240-20.045(5)(B) and (C));

c. Plans and specifications for the Ringer Solar Project are provided in the BTA documentation included with Mr. Wibbenmeyer's Direct Testimony as Exhibit A to Schedule SW-D14 (20 CSR 4240-20.045(5)(D));

77. As required by 20 CSR 4240-20.045(6), Ameren Missouri provides the following information:

a. The Ringer Solar Project site, located in Stoddard County, Missouri, is depicted in and described in detail in Schedule SW-D16 attached to Mr. Wibbenmeyer's Direct Testimony (20 CSR 4240-20.045(6)(A));

b. Items that fall within the scope of 20 CSR 4240-20.045(6)(B) that are owned by a third-party and crossed within the Project site are identified in *Application Schedule F*;

c. In accordance with 20 CSR 4240-20.045(6)(C),

(1) The scope of the Project is described in Mr. Wibbenmeyer's Direct Testimony;

(2) Existing solar project specifications and existing drawings for the Ringer Solar Project can be found in Exhibit A of Schedule SW-D14 of Mr. Wibbenmeyer's Direct Testimony;

(3) The base case estimated cost of the Ringer Solar Project is approximately \*\*\* \_\_\_\_\_ \*\*\*;

(4) The operational features of the Ringer Solar Project once it is fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony;

d. Construction is expected to commence in March of 2027 after the required permits are received, and the Ringer Solar Project is expected to be placed in-service in the Q2 2029 (20 CSR 4240-20.045(6)(D));

e. The Ringer Solar Project has no common plant to be included in the construction Project (20 CSR 4240-20.045(6)(E));

f. Ameren Missouri's plans for financing the Ringer Solar Project are discussed in the Direct Testimony of Mr. Lansford (20 CSR 4240-20.045(6)(F));

g. The Ringer Solar Project is contemplated by the Company's 2025 Preferred Resource Plan as explained in the Direct Testimony of Mr. Michels (20 CSR 4240-20.045(6)(G));

h. As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri utilized a request for proposal process to select the Ringer Solar Project. Because the Company is not constructing the Ringer itself but is contracting to acquire it through a BTA, any competitive bidding for design, engineering, procurement, construction management, and construction is the responsibility of the Project developer (20 CSR 4240-20.045(6)(H));

i. The Ringer Solar Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation and switching stations are operated, including its existing renewable generation and the associated interconnections. More specifically, the Ringer Solar Project will be operated by Ameren

Missouri, with the operation of the solar facility managed by the Ameren Missouri Energy Management & Trading group, similar to the Company's other large-scale renewable generators such as the Atchison County and High Prairie Wind Energy Centers and Boomtown, Huck Finn, and Cass County Solar Energy Centers. Ameren Missouri will coordinate all operations of the solar facility with the MISO, of which Ameren Missouri is a member (20 CSR 4240-20.045(6)(I));

j. With respect to the solar facility, Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that the Ringer Solar Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service, as adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239; and

k. There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the BTA contractor has responsibility for, and has already procured, all necessary land rights.

78. Ameren Missouri is providing in its workpapers analyses consistent with the Third Stipulation and Agreement filed in File No. EA-2019-0021. Transmission interconnection costs are included within the base and risk-adjusted considerations for the Projects.

79. As required by paragraph 5(o) of the Stipulation and Agreement entered and approved in File No. EA-2023-0286, Ameren Missouri:

a. Has provided by email from Mr. Michels to Staff the analyses required by subsections i. and ii.;

b. Through the direct testimonies of Mr. Wills, Mr. Michels, and Mr. Dixon, is providing testimony regarding what needs the Solar Projects address, whether qualitative or quantitative, as well as the timing of those needs, as required by subsection iii.;

c. Through the Direct Testimony of Mr. Wills, is outlining what regulatory treatments, if any, are implicated by this filing, as required by subsection iv.; and

d. As described in this *Application* with reference to the direct testimonies of Ameren Missouri witnesses and more specifically discussed in Mr. Wills' Direct Testimony, is providing testimony addressing questions 1-10, as required by subsection v.

#### **IV. PRAYER FOR RELIEF**

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission issue a final order:

- Granting a CCN, pursuant to Section 393.170.1, RSMo., authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Castle Bluff BESS Project located in St. Louis County, Missouri;
- Granting a CCN, pursuant to Section 393.170.1, RSMo., authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Huck Finn BESS Project located in Audrain County, Missouri;
- Granting a CCN, pursuant to Section 393.170.1, RSMo., authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Millcreek BESS Project in Lincoln County, Missouri;
- Granting a CCN pursuant to Section 393.170.1 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage a new 161 kV switching

station (the "Quinn Switching Station") in order to interconnect the Millcreek BESS Project to the existing 161 kV transmission system in Lincoln County, Missouri;

- Granting a CCN, pursuant to Section 393.170.1, authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Tom Sawyer Solar Project in Audrain County, Missouri;
- Granting a CCN, pursuant to Section 393.170.1, authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Ringer Solar Project in Stoddard County, Missouri;
- Granting the Company authority under Section 393.190.1 to complete the merger of the Solar Projects companies into Ameren Missouri, with Ameren Missouri to be the survivor, after acquisition by Ameren Missouri of the project companies, as explained further herein and as outlined in greater detail in the Direct Testimony of Mr. Wibbenmeyer.
- Granting variances from the requirement in 20 CSR 4240-20.045(5)(D) and 20 CSR 4240-20.045(3)(C) so that as-built drawings for the BESS Projects and the Solar Projects can be supplied after exercise of authority under the CCN consistent with the condition related to as-built drawings adopted by the Commission in File Nos. EA-2023-0286 and EA-2025-0239;
- Granting the Company variances from the requirement in 20 CSR 4240-20.045(6)(J) respecting the BESS Projects and the Solar Projects, allowing the Company to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages within ninety (90) days prior to the date that the Projects will be placed in-service, and the Company shall submit final plans for restoration of safe and adequate service after significant, unplanned/forced outages no later than sixty (60) days

after each BESS Project and each Solar Project are placed in-service, consistent with the condition related to restoration plans in File No. EA-2025-0238;

- Issuance of a Commission order granting the relief requested in this *Application* by November 30, 2026; and
- For such other and further relief, findings, or orders that the Commission believes just, reasonable, and in the public interest.

Respectfully submitted,

/s/ *Jermaine Grubbs*

**Jermaine Grubbs**, MO Bar #68970

Senior Corporate Counsel

**Wendy K. Tatro**, Mo Bar #60261

Senior Director and Assistant General  
Counsel

Ameren Missouri

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E-mail: lowery@jblawllc.com

**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on counsel for all parties of record via electronic mail on this 22<sup>nd</sup> day of May, 2026.

**/s/ Jermaine Grubbs**

Schedule A



State of Missouri
Denny Hoskins, Secretary of State
Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

X001858426
Date Filed: 11/5/2025
Expiration Date: 11/5/2030
Denny Hoskins
Missouri Secretary of State

Registration of Fictitious Name

(Submit with filing fee of \$7.00)
(Must be typed or printed)

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417, RSMo)

Please check one box:

New
[checked] Registration [ ] Renewal [ ] Amendment [ ] Correction
Charter number Charter number Charter number

The undersigned is doing business under the following name and at the following address:

Business name to be registered: AMEREN MISSOURI
Business Address: 1901 Chouteau Ave
(P.O. Box may only be used in addition to a physical street address)
City, State and Zip Code: Saint Louis, MO 63103-3003

Owner Information:

If a business entity is an owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed. Please attach a separate page for more than three owners. The parties having an interest in the business, and the percentage they own are:

Table with 6 columns: Name of Owners, Individual or Business Entity; Charter # Required If Business Entity; Street and Number; City and State; Zip Code; If Listed, Percentage of Ownership Must Equal 100%. Row 1: UNION ELECTRIC COMPANY, 00040441, 5661 Telegraph Rd Ste 4B, Saint Louis, MO, 63129 - 4275, 100.00

All owners must affirm by signing below

In Affirmation thereof, the facts stated above are true and correct:
(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060 RSMo)

UNION ELECTRIC COMPANY - Jonathan T Shade T SHADE 11/05/2025
Owner's Signature or Authorized Signature of Business Entity Printed Name Date

Name and address to return filed document:
Name: Julie Irby
Address: Email: jirby@ameren.com
City, State, and Zip Code:

# STATE OF MISSOURI



**Denny Hoskins**  
**Secretary of State**

CORPORATION DIVISION  
CERTIFICATE OF GOOD STANDING

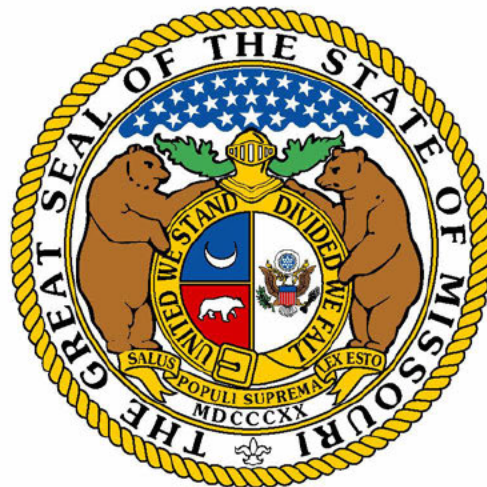
I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

***UNION ELECTRIC COMPANY***  
***00040441***

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 19th day of May, 2026.

*Denny Hoskins*  
Secretary of State



Certification Number: CERT-05192026-0123



Utilities Crossings List

Company	Utility	Contact Information	Email (if available)	Phone (if available)
Cuivre River Cooperative	Overhead Electric	Doug Tracy - President / CEO	<a href="mailto:dtracy@cuivre.com">dtracy@cuivre.com</a>	800-392-3709
Public Water Supply District No. 1 of Pike County, Missouri	Underground Water	Richard Obercahlhoff	N/A	573-324-3221
City of Silex	Water	N/A	<a href="mailto:water@silexo.org">water@silexo.org</a>	573-384-5245

Utilities Crossings List

Company	Utility	Contact Information	Email (if available)	Phone (if available)
City of Hermann	Gas	Mitch Wiggins, USDI 210 N. Elson St., Ste C, Kirksville, MO 63501 / 1902 Jefferson St, Hermann, MO 65041	<a href="mailto:mwiggins@usdi.us">mwiggins@usdi.us</a> or <a href="mailto:hermann.pw@gmail.com">hermann.pw@gmail.com</a>	860 947 3316/ 573 486 5400
Rockies Express Pipeline LLC	Gas	Brad Ulmer, 11550 Ash Street, Ste 220, Leawood, KS 66211	<a href="mailto:brad.ulmer@tallgrass.com">brad.ulmer@tallgrass.com</a>	303 783 3298
Panhandle Eastern Pipe Line Company	Gas	David Stewart, 1300 Main Street, Houston, TX 77002	<a href="mailto:david_stewart@energytransfer.com">david_stewart@energytransfer.com</a>	913 906 1528
PWSD #2 of Monroe Co, MO	Water	23504 Hwy. 24 West, Paris, MO 65275	<a href="mailto:pwsd@parismo.net">pwsd@parismo.net</a>	860 327 4778
Ralls County Electric	Electric	17594 Highway 19, PO Box 15, New London, MO 63459		
Clarence Cannon Wholesale Water Commission	Water	Heath Hall, 34146 Route U, Stoutsville, MO 65283	<a href="mailto:hhall@clarencannonwater.org">hhall@clarencannonwater.org</a>	573 672 3221
Windstream Communications	Communication lines	Registered Agent Solutions, Inc., 130 S. Berniston Ave., Ste 500, St. Louis MO 63105		
MNA - Bluebird	Telephone	National Corporate Research, Ltd., 9666 Olive Blvd., Ste 690, St. Louis, MO 63132		

Utilities Crossings List

Company	Utility	Contact Information	Email (if available)	Phone (if available)
Little River Drainage District	Drainage District	PO Box 159, Cape Girardeau, Missouri 63702	<a href="mailto:drainage@thelrdd.org">drainage@thelrdd.org</a>	573-335-3439
Scott-New Madrid-Mississippi Co-Operative Association [NKA SEMO Electric Cooperative]	Electric	1505 S. Main Street, Sikeston, Missouri 63801 OR PO Box 520 Sikeston, Missouri 63801	<a href="mailto:info@nosemo.com">info@nosemo.com</a>	800-813-5230
AT&T communications line	Telephone	282 N. Ottawa St., Joliet, IL 60432	<a href="mailto:jq1423@att.com">jq1423@att.com</a>	708-267-0679