

Additionally, the interests of the contractors, equipment suppliers, and other suppliers whose pricing informed cost information in this docket could also be harmed due to the highly sensitive and competitive nature of their costs and pricing. This is why the Supplier Terms contain confidentiality provisions and the Company's RFPs (as is typical of RFPs of this type) contain the Company's agreement to maintain the confidentiality of the RFP responses.

1. Section II, Table 1, Page 7, Base Case Cost Estimate
2. Section II(D), Page 15, Paragraph 30, line 2
3. Section II(E), Page 17, Paragraph 34(c)(iii), lines 1 and 2
4. Section II(E), Page 19, Paragraph 35(c)(iii), lines 1 and 2
5. Section II(E), Page 21, Paragraph 36(c)(iii), lines 1 and 2
6. Section III, Page 24, Table 2, Base Case Cost Estimate
7. Section III(C), Page 33, Paragraph 67, lines 2 and 3
8. Section III(D), Page 36, Paragraph 73(b), line 2
9. Section III(D), Page 37, Paragraph 74(c)(3), line 2
10. Section III(D), Page 39, Paragraph 76(b), line 2
11. Section III(D), Page 40, Paragraph 77(c)(3), line 2

Direct Testimony – Rob Dixon

As explained in the Company's concurrently filed *Motion for Protective Order*, Highly Confidential Highly Sensitive protection for certain materials is needed for several reasons. In recognition of the concerns of prospective customers under the LLCS rate schedule in File No. ET-2025-0184, the Commission approved an amendment to a protective order affording even greater protection to such customers' highly sensitive, competitive information.¹ That Protective Order was issued

¹ See *Protective Order*, File No. ET-2025-0184 (Aug. 12, 2025).

based upon the Amended Joint Motion for Protective Order filed in that docket by Amazon Data Services, Inc. and Google LLC. That motion articulates why it was appropriate in that docket – and for those same reasons is appropriate in this docket – to create a “Highly Confidential Highly Sensitive,” classification. Specifically, the Commission issued the August 12, 2025, Protective Order in that docket which:

Allow[ed] parties to additionally designate as “Highly Confidential Highly Sensitive or HCHS” the following (1) confidential information relating to the data center operations, including customer specific data, customer pricing, supply costs, business relationships, market data, other proprietary data and protected trade secrets; and (2) information relating to confidential contracts entered into relating to data centers.

1. Page 7, line 16, HIGHLY CONFIDENTIAL HIGHLY SENSITIVE as it relates to the ESAs entered into by the Company with LLCS customers.
2. Page 8, lines 4 through 6, HIGHLY CONFIDENTIAL HIGHLY SENSITIVE as it relates to the ESAs entered into by the Company with LLCS customers.
3. Page 12, lines 2 through 3, HIGHLY CONFIDENTIAL HIGHLY SENSITIVE as it relates to the ESAs entered into by the Company with LLCS customers.

Direct Testimony – Mitchell Lansford (all are **HIGHLY CONFIDENTIAL Per Motion for Protective Order**)

1. Page 4, lines 2, 9, 10, 15, and 16, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
2. Page 5, lines 1, 2, 8, 9, 10, and 11, HIGHLY CONFIDENTIAL Per Motion for Protective Order.

Direct Testimony – Matt Michels (HIGHLY CONFIDENTIAL Per Motion for Protective Order)

Schedule MM-D1, HIGHLY CONFIDENTIAL Per Motion for Protective Order.

Direct Testimony – Harman Ormani

1. Page 3, lines 15 through 17, Confidential: It provides cost estimates under the Generator Interconnection Agreement, which includes goods or services to be acquired for the Quinn Switching Station, 20 CSR 4240-2.135(2)(A)4, 8.
2. Page 4, line 2 (Figure 2 Table), Confidential: It provides cost estimates under the Generator Interconnection Agreement, which includes goods or services to be acquired for the interconnection, 20 CSR 4240-2.135(2)(A)4, 8.
3. Page 5, line 4, Confidential: Confidential: It provides cost estimates under the Generator Interconnection Agreement, which includes goods or services to be acquired for the interconnection, 20 CSR 4240-2.135(2)(A)4, 8.
4. Schedule HO-D1, Confidential in its entirety: It contains the Generator Interconnection Agreement, which includes cost estimates for goods or services to be acquired for the interconnection and detailed operational information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)4, 7, 8.
5. Schedule HO-D2 Confidential in its entirety: It contains plans and specifications for the interconnection, which also implicate the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.

Direct Testimony – Scott Wibbenmeyer

1. Page 5, line 1, Table 2 – Base Case Cost Estimate, HIGHLY CONFIDENTIAL Per Motion for Protective Order.

2. Page 16, lines 3 through 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
3. Page 17, lines 1 through 18, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
4. Page 22, line 8: States a cost estimate under MISO's ERAS process, Confidential 20 CSR 4240-2.135(2)(A)4, 8.
5. Page 23, lines 11 and 12, Table 2, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
6. Page 24, lines 6 and 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
7. Page 25, lines 1 through 3, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
8. Page 28, Table 4, Base Case Cost Estimate and Risk Adjusted Cost Estimate, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
9. Page 31, lines 4 through 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
10. Page 32, lines 1 through 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
11. Page 33, lines 1 through 18, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
12. Page 35, lines 8, 9, and 17 through 22, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
13. Page 37, line 6, HIGHLY CONFIDENTIAL Per Motion for Protective Order.

14. Page 40, lines 10 through 16, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
15. Page 41, lines 1 through 16, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
16. Page 47, lines 3 through 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
17. Page 48, lines 1 through 23, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
18. Page 49, lines 1 through 19, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
19. Page 51, line 7, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
20. Page 54, lines 10 through 22, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
21. Page 55, lines 1 and 2, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
22. Schedule SW-D1, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
23. Schedule SW-D2, Confidential Castle Bluff BESS Project Preliminary Site Layout: Is nonpublic information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.
24. Schedule SW-D4, Confidential Huck Finn BESS Project Preliminary Site Layout: Is nonpublic information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.

25. Schedule SW-D6, Confidential Millcreek BESS Project Preliminary Site Layout: Is nonpublic information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.
26. Schedule SW-D9, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
27. Schedule SW-D10, HIGHLY CONFIDENTIAL Per Motion for Protective Order.
28. Schedule SW-D13, Confidential Tom Sawyer Solar Project Preliminary Site Layout: Is nonpublic information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.
29. Schedule SW-D14, HIGHLY CONFIDENTIAL Per Motion Protective Order.
30. Schedule SW-D16, Confidential Ringer Solar Project Preliminary Site Layout: Is nonpublic information implicating the security of the Company's facilities, 20 CSR 4240-2.135(2)(A)7, 8.

Direct Testimony – Steven Wills (HIGHLY CONFIDENTIAL Per Motion for Protective Order)

1. Page 10, lines 6 through 9, HIGHLY CONFIDENTIAL Per Motion for Protective Order.

Respectfully submitted,

/s/ *Jermaine Grubbs*

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 22nd day of May, 2026.

/s/ Jermaine Grubbs
Jermaine Grubbs