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MISSOURI PUBLIC SERVICE COMMISSION

File No. EA-2026-0183

DIRECT TESTIMONY

OF

STEVEN M. WILLS

ON

BEHALF OF

UNION ELECTRIC COMPANY,

d/b/a Ameren Missouri

**St. Louis, Missouri
May 2026**

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DIRECT TESTIMONY

OF

STEVEN M. WILLS

FILE NO. EA-2026-0183

I. INTRODUCTION

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Q. Please state your name and business address.

A. Steven M. Wills, One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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

A. I am employed by Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), as the Senior Director of Regulatory Affairs.

Q. Please describe your professional background and qualifications.

A. I received a Bachelor of Music degree from the University of Missouri-Columbia in 1996. I subsequently earned a Master of Music degree from Rice University in 1998, then a Master of Business Administration (“M.B.A.”) degree with an emphasis in Economics from St. Louis University in 2002. While pursuing my M.B.A., I interned at Ameren Energy in the Pricing and Analysis Group. Following completion of my M.B.A. in May 2002, I was hired by Laclede Gas Company as a Senior Analyst in its Financial Services Department. In this role, I assisted the Manager of Financial Services in coordinating all financial aspects of rate cases, regulatory filings, rating agency studies, and numerous other projects.

In June 2004, I joined Ameren Services as a Forecasting Specialist. In this role, I developed forecasting models and systems that supported the Ameren operating companies’ involvement in

1 the Midwest Independent Transmission System Operator, Inc.'s ("MISO")¹ Day 2 Energy
2 Markets. In November 2005, I moved into the Corporate Analysis Department of Ameren
3 Services, where I was responsible for performing load research activities, electric and gas sales
4 forecasts, and assisting with weather normalization for rate cases. In January 2007, I accepted a
5 role I briefly held with Ameren Energy Marketing Company as an Asset and Trading Optimization
6 Specialist before returning to Ameren Services as a Senior Commercial Transactions Analyst in
7 July 2007. I was subsequently promoted to the position of Manager, Quantitative Analytics, where
8 I was responsible for overseeing load research, forecasting and weather normalization activities,
9 as well as developing prices for structured wholesale transactions.

10 In April 2015, I accepted a position with Ameren Illinois as its Director, Rates & Analysis.
11 In this role, I was responsible for the group that performed Class Cost of Service, revenue
12 allocation, and rate design activities for Ameren Illinois, as well as maintained and administered
13 that company's tariffs and riders. In December 2016, I accepted a position with the same title at
14 Ameren Missouri. In 2022, I was promoted to the position of Director of Regulatory Affairs for
15 Ameren Missouri, in which I provided oversight and direction of all state regulated activities of
16 the Company, and became Senior Director, with similar responsibilities, in January 2024.

17 II. PURPOSE OF TESTIMONY

18 Q. What is the purpose of your testimony?

19 A. The purpose of my testimony is to describe generally the Company's application
20 for Certificates of Convenience and Necessity ("CCN") for the Castle Bluff, Huck Finn, and
21 Millcreek Battery Energy Storage Systems ("BESS"), (collectively referred to as the "BESS
22 Projects") as well as the Tom Sawyer and Ringer Solar Projects ("Tom Sawyer" or "Ringer"

¹ Now known as the Midcontinent Independent System Operator, Inc.

1 respectively, "Solar Projects" collectively, and together with the BESS Projects, the "Projects").
2 The BESS Projects represent 545 Megawatt_{AC} ("MW") of battery energy storage capacity. Tom
3 Sawyer is an approximately 175 MW solar generating plant to be built in Audrain County,
4 Missouri. Ringer is an approximately 225 MW solar generating plan to be built in Stoddard
5 County, Missouri. The Projects collectively total approximately 945 MW of capacity.

6 The BESS facilities are planned to be constructed and placed into service as a part of the
7 Company's portfolio of generating resources by the second quarter of 2028. Tom Sawyer and
8 Ringer are expected to go in service in 2028 and 2029, respectively. I will address the *Tartan*
9 Factors that the Commission typically uses in the evaluation of CCNs and explain why granting
10 the CCN is in the public interest. Finally, I will address certain items required by a Stipulation and
11 Agreement entered into by the Company and certain other parties and approved by the
12 Commission in resolution of File No. EA-2023-0286.

13 **Q. Why is Ameren Missouri proposing construction of the Projects?**

14 A. As discussed in the Direct Testimonies of Company witnesses Matt Michels,
15 Andrew Meyer, and Robert B. Dixon, the Projects are needed to provide the capacity and low cost
16 energy required to meet our customers' total capacity and energy needs in the context of our
17 Preferred Resource Plan ("PRP"), which includes an appropriate and diverse mix of resources
18 including both renewable and dispatchable generation needed to achieve the fundamental objective
19 of resource planning – "to provide the public with energy services that are safe, reliable, and
20 efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that
21 serves the public interest and is consistent with state energy and environmental policies."² Growth
22 in demand expected from large load customers that have either executed Electric Service

² 20 CSR 4240-22.010(2).

1 Agreements ("ESAs"), or are seeking, or may seek in the near future, retail electric service from
2 the Company, is making the Company's prospective need for capacity and energy resources
3 increasingly acute and urgent. On February 13, 2025, the Company filed a Notice of Change in
4 PRP associated with its Integrated Resource Plan ("IRP"), which identified a need for the
5 acceleration of certain generation, otherwise planned to be developed later in the planning horizon,
6 due to changes in load expectations arising from the high level of interest the Company was
7 receiving from large load customers, as well as a reduction in the level of energy efficiency
8 program savings expected as an outcome of the Company's most recent application for approval
9 of energy efficiency programs under the Missouri Energy Efficiency Investment Act (MEEIA).
10 Since that change in PRP, the Company has announced that it has entered into ESAs to serve 2.8
11 Gigawatts ("GW") of large load demand. The impact of this new expected demand on the
12 Company's retail load forecast results in the need for additional capacity to maintain resource
13 adequacy, as well as energy resources, in the same general timeframe as the Projects are
14 contemplated to come online. See the Direct Testimony of Matt Michels for more details.

15 Additionally, given the load growth arising from these new large load customers that have
16 entered into ESAs, the Company expects to need additional renewable energy either for Renewable
17 Energy Standard ("RES") compliance and/or to meet demand for renewables through large load
18 customer voluntary subscription programs. In the Company's large load tariff case, File No. ET-
19 2025-0184, the Company was granted a variance from the Commission's RES rules that would
20 remove the load of large load customers that have procured sufficient renewable energy through a
21 Company program from determination of the Company's RES obligation. As a result of the
22 Company serving 2.8 GW of large load customer demand under the recently signed ESAs, one of
23 two things are virtually certain to happen: 1) the Company will need renewable resources like the

1 Tom Sawyer and Ringer Solar Projects to provide the renewable energy to meet the demand of
2 large load customers through our programs (and realize program revenues to the benefit of all
3 customers), or 2) the large load customer load that does not enroll in programs sufficient to trigger
4 the variance will result in a need for additional renewable energy for RES compliance. Either way,
5 the Solar Projects will be needed to satisfy renewable legal requirements or contractual
6 commitments to large load customers that pay for the renewable energy attributes in a manner that
7 reduces the revenue requirement responsibility of existing customers.

8 Finally, the Projects are needed for many of the reasons that the Commission found a need
9 for the Company's Boomtown Solar Energy Center in its order in File No. EA-2022-0245,
10 including that they have accredited capacity value, and that they can help alleviate increasingly
11 tight capacity markets. Further, the Solar Projects provide economic development benefits by
12 meeting customer demand for renewable energy and provide valuable low cost energy year round,
13 but especially in the summer, which can mitigate exposure to volatile energy market prices
14 (features which either do apply, or may also apply, to the BESS Projects).

15 **III. THE PROJECTS ARE NECESSARY OR CONVENIENT FOR THE PUBLIC**
16 **SERVICE**

17 **Q. What do you understand to be the requirements to obtain a CCN for**
18 **generating plants like the Solar Projects and the BESS Projects?**

19 A. The primary concern for the Commission in determining whether to grant a CCN
20 for a generating plant is whether the proposed plant is in the public interest—specifically, whether
21 the proposed plant is "necessary or convenient for the public service." Staff has explained the
22 nature of the Commission's analysis of CCN requests in a previous filing:

23 In explaining the nature of its analysis [of CCN requests], the Commission
24 stated the following:

1 **Necessary or Convenient for the Public Service**

2 The Court of Appeals has said that '[f]or some reason, either
3 intentional or otherwise, the General Assembly has not seen fit to
4 statutorily spell out any specific criteria to aid in the determination
5 of what is 'necessary or convenient for the public service' within the
6 meaning of such language as employed in Section 393.170'
7 The dominant purpose in creation of the Commission is public
8 welfare. The administration of its authority should be directed to
9 that purpose. In every case where it is called upon to grant a permit,
10 or to authorize an additional service to be rendered by an authorized
11 certificate holder, the Commission should be guided, primarily, by
12 considerations of public interest.³

13 In approving a CCN for gas-fired peaking units at Aquila's South Harper plant, the
14 Commission affirmed Staff's description of the Commission's primary consideration when faced
15 with a CCN request, stating:

16 The dominant purpose in creation of the Commission is public
17 welfare. The administration of its authority should be directed to
18 that purpose. In every case where it is called upon to grant a permit,
19 or to authorize an additional service to be rendered by an authorized
20 certificate holder, the Commission should be guided, primarily, by
21 considerations of public interest.⁴

22 Applying this standard, the Commission concluded that the peaking plants at South Harper
23 would "promote the public interest."⁵ In sum, the primary question before the Commission in this
24 case is whether the Projects are in the public interest.

25 **Q. Does the Commission generally use guidelines in making the determination**
26 **you just described?**

27 A. Yes, for many years the Commission has used the so-called "*Tartan* Factors" as a
28 guideline.

³ File No. EA-2006-0309, *Staff's Post-Hearing Brief*, p. 6 (case citations omitted), filed May 12, 2006.

⁴ File No. EA-2006-0309, *Report and Order*, p. 23, filed May 23, 2006.

⁵ *Id.*, p. 56.

1 determined that need was satisfied in the case and considered the following factors: the
2 communities' "preference" for natural gas, the positive economic development impacts that
3 granting the CCN would promote, and the potential for lower energy costs for consumers. By
4 doing so, it did not anchor itself to one criterion in deciding whether a need existed but considered
5 the totality of the evidence based on a broad view of the benefits of the project.

6 **Q. Please elaborate further on why the Projects satisfy the *Tartan* Factor of**
7 **need.**

8 A. As I noted earlier, the need for the Projects arises from the Company's analysis in
9 its 2025 Notification of Change in PRP, including analysis of large load customers like those that
10 will be served under the recently executed ESAs.

11 Company witness Michels' Direct Testimony details the need for the Company to add
12 capacity to ensure reliability and meet the Company's resource adequacy requirements for all of
13 its customers. The BESS Projects provide such capacity. The Company also needs to fill out its
14 portfolio with cost-effective energy resources like the Tom Sawyer and Ringer Solar Projects to
15 fill expected short energy positions. Additionally, the Solar Projects will be needed to either
16 comply with the Company's RES obligation or to meet large load customers' subscription demand
17 to renewable energy programs. The BESS Projects may also be needed to meet subscription
18 demand under the Clean Capacity Advancement Program (CCAP) approved by the Commission
19 in the Company's large load tariff case (File No. ET-2025-0284). And the Projects achieve a
20 number of other important objectives around enhancing economic development in the state,
21 meeting customer demand for renewable energy, integrating that renewable energy into the
22 system, and adding capacity as well as energy capabilities to reduce the Company's exposure to

1 tight and volatile wholesale power markets. The Projects are needed improvements justifying their
2 costs.

3 ***Tartan Factor 2: The Company is Qualified to Operate the Projects.***

4 **Q. How does the Company satisfy *Tartan Factor 2*?**

5 A. The Company has safely and reliably operated thousands of MW of generation,
6 including generation associated with a wide variety of fuel sources and technologies, for decades.
7 With respect to solar generation specifically, the Company currently owns and operates five other
8 large scale solar facilities, is in the process of constructing or developing two more, and also has
9 numerous other smaller solar facilities in operation across its service territory. The Company is
10 clearly qualified to operate the Solar Projects. And while the Company does not have the same
11 historical experience owning and operating battery storage technology at the scale of the BESS
12 Projects, it has been authorized by the Commission previously in File No. EA-2025-0238 to
13 construct a similar 400 MW BESS facility at the Big Hollow Energy Center and will therefore
14 have experience with this technology prior to the BESS Projects in this case going into service. As
15 a large utility with thousands of experienced employees and connections to industry organizations
16 and peer utilities from which to understand best practices, it has the resources, expertise, and
17 wherewithal to successfully integrate the operations of battery technology, just as it has integrated
18 new technologies in the past when introducing new forms of electrical generation. Indeed, there
19 was a first time for coal generation, gas generation, nuclear generation, landfill gas generation,
20 wind generation, solar generation, etc., and the Company now successfully operates each of those
21 technologies. Company witnesses Scott Wibbenmeyer and Harman Ormani address the
22 Company's qualifications to operate the Projects in their Direct Testimony.

1 ***Tartan Factor 3: The Company has the Financial Ability to Develop the Projects***

2 **Q. Please address Ameren Missouri's financial ability to develop the Projects.**

3 A. As discussed further in the Direct Testimony of Company witness Mitchell
4 Lansford, Ameren Missouri has the financial capability to generate and raise the capital needed to
5 develop the Projects. The upfront base case capital cost of the Tom Sawyer Project and the Ringer
6 Project is estimated to be approximately *** _____ *** and *** _____ ***
7 respectively, with risk-adjusted capital cost estimates of approximately *** _____ *** and
8 *** _____ *** respectively. The BESS Projects have a cumulative estimated base total
9 capital cost of *** _____ *** and a risk-adjusted cost estimate of *** _____ ***. The
10 Company's existing rate base – financed by an appropriate balance of debt and equity – exceeds
11 \$13 billion, and its planned capital additions over the coming five years (not including the Projects)
12 also exceeds \$16 billion. The Company has sufficient access to capital markets based on, among
13 other things, its stable issuer credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's
14 credit rating agencies respectively. Accordingly, there should be no question regarding the
15 Company's financial wherewithal to undertake the Projects.

16 ***Tartan Factor 4: The Projects are Economically Feasible.***

17 **Q. Please address the economic feasibility of the Projects.**

18 A. The Projects represent improvements justifying their cost. This is because the
19 Projects are needed resources to reliably and cost effectively meet customers' capacity and energy
20 needs, including the growing needs of expected large load customers, to meet renewable mandates
21 or contractual commitments, and to mitigate certain risks. The Commission has recognized that
22 when a project is needed, the economic feasibility question largely turns on whether the utility can

1 finance the project which, as discussed earlier, is not an issue with respect to the Projects. The
2 economic feasibility of the Projects is also supported by other facts.

3 The Company's IRP is used to establish the Company's PRP. In selecting the PRP, the
4 primary selection criterion is minimization of the net present value of revenue requirement –
5 essentially, this means that the PRP is selected based on an assessment of the "least cost" portfolio
6 available to meet customers' energy and capacity needs, consistent with other secondary planning
7 objectives and risk assessments. The IRP analysis underlying the Company's Notification of
8 Change in PRP demonstrates that the Company's PRP, which includes the proposed Projects, is a
9 cost-effective means of providing the energy and capacity resources needed to reliably serve
10 customers over time, supporting the conclusion that the Projects are economically feasible.

11 **Q. What other characteristics of the Projects also support a finding of economic**
12 **feasibility?**

13 A. Consistent with items that the Commission has relied on in past CCN cases in its
14 analysis of economic feasibility, the Projects will create jobs and tax revenues within the state and
15 within the Company's service territory, and will lessen the Company's reliance on the MISO energy
16 and capacity market. Moreover, the Project's contracting for equipment and construction activities
17 is largely the product of competitive bidding and otherwise followed the Company's well-
18 established procurement policies and procedures to ensure the Projects are built at a competitive
19 market-based cost. Further, the Projects take advantage of significant tax credits that exist today,
20 which substantially lower the overall costs and for at least two of the Projects (Tom Sawyer and
21 Ringer), Chapter 100 arrangements will also lower the overall property tax bill to the benefit of
22 our customers while providing payments in lieu of taxes to the benefit of the local communities
23 where the projects are located. Additionally, the proximity of the Castle Bluff and Huck Finn BESS

1 Projects to existing transmission infrastructure enhances interconnection potential, while the
2 Castle Bluff BESS's location within a designated energy community provides an additional tax
3 credit benefit under existing federal incentives.

4 ***Tartan* Factor 5: The Projects are in the Public Interest.**

5 **Q. Finally, turning to the last *Tartan* factor, does granting the CCN for the Solar**
6 **and BESS Projects promote the public interest?**

7 A. Yes. It is often said that the public interest test is generally satisfied if each of the
8 first four *Tartan* factors are satisfied. Given that each of the first four *Tartan* Factors strongly
9 support the issuance of the CCNs, as discussed above, it is a logical extension to conclude that the
10 Projects are in the public interest. But just to put a finer point on the public interest question, I will
11 reiterate the perspective that I first shared in the Boomtown case (File No. EA-2022- 0245) on the
12 public interest here.

13 Generally, the public interest is served if the Company is able to effectively balance the
14 three priorities that should be considered the pillars of the generation transition that the Company
15 is undertaking and which is otherwise happening broadly across our industry: reliability,
16 affordability, and sustainability.

17 These are the areas that will impact the Company's customers and communities, which are
18 key interests the Commission's regulation of public utilities is designed to promote and protect.
19 Consequently, they are the areas that the Company has focused on in developing its PRP. The
20 Projects are a part of the Company's PRP, which is the Company's solution to optimizing across
21 those priorities. Specifically, the Projects in this case are a key component of the PRP to help
22 ensure an adequate overall supply of capacity, low-cost energy, and renewable attributes to meet

1 the Company's RES obligation in the context of a system designed to provide the reliability our
2 customers depend on.

3 **IV. EA-2023-0286 STIPULATION AND AGREEMENT COMPLIANCE**

4 **Q. In the Company's recent CCN case for renewable energy facilities (File No.**
5 **EA-2023-0286) in which it received CCNs for three solar facilities and potential approval of**
6 **a fourth subject to certain conditions being met,⁶ the Company committed in a Stipulation**
7 **and Agreement ("Solar Stipulation") to provide certain information supporting future CCN**
8 **applications filed prior to 2030. What information is required under that Solar Stipulation**
9 **provision and how does the Company's filing satisfy those requirements?**

10 A. The Solar Stipulation, filed with the Commission on March 5, 2024, and approved
11 by the Commission on March 21, 2024, required the Company to provide several categories of
12 information, including:

- 13 1. Provide to Staff prior to the filing of a future CCN application analysis of three
14 alternative resource plans of Staff's choosing based on the Company's 2023 IRP,
- 15 2. Analysis of its PRP using project specific assumptions replacing generic
16 resource assumptions used in its IRP,
- 17 3. Analysis of a "do nothing" plan that assumes the requested CCN is not granted
18 and the Company does not pursue the project that is the subject of the
19 application,
- 20 4. Testimony regarding the needs being addressed by the resource for which the
21 CCN is being sought,
- 22 5. Testimony regarding any regulatory treatments implicated by the filing, and

⁶ Those conditions were met, and the Commission granted a CCN for the fourth facility.

1 6. Answers to ten specific questions that Staff identified in File No. EA-2023-
2 0286 as being relevant to the approval of a CCN application.

3 **Q. Has the Company provided all the information required under the Solar**
4 **Stipulation in support of its CCN application for the Projects in this case?**

5 A. Yes. The Company provided the analysis required in Item 1 above in advance of its
6 Castle Bluff CCN filing in File No. EA-2024-0237 on June 6, 2024, to Staff members Busch,
7 Luebbert, Fortson, and Graham. Consequently, that item is fully satisfied. The analyses required
8 in Items 2 and 3 above are addressed in the Direct Testimony of witness Michels at pages 39
9 through 42. In response to Item 4, I have described the need for the resource at a high level in my
10 testimony above, but the detailed description required by the Solar Stipulation is addressed in the
11 Direct Testimonies of witnesses Rob Dixon, Matt Michels, and Andrew Meyer. For Item 5, Plant
12 in Service Accounting ("PISA") will apply to the Projects. Beyond PISA, the Company may also
13 decide in the future to seek inclusion of the costs and benefits of the Solar Projects in its Renewable
14 Energy Standard Rate Adjustment Mechanism ("RESRAM") to the extent it is determined that the
15 primary purpose of those Projects is that the output of the Project is needed to satisfy, and that it
16 will be dedicated to meeting the Company's Renewable Energy Standard compliance. The
17 RESRAM determination may depend on the extent to which any of the large load demand under
18 ESAs is subject to the RES rule variance I referenced earlier in my testimony. I will address the
19 ten questions identified by Staff in Item 6 of the list above in the remainder of this section of my
20 testimony.

21 **Q. 1. Does the Commission have jurisdiction over the Applicant?**

22 A. Yes. As indicated in the Application, Ameren Missouri acknowledges that it is an
23 electrical corporation and public utility subject to the Commission's jurisdiction.

1 **Q. 2. Very specifically, what authority is requested, and does the Commission**
2 **have jurisdiction to grant the authority requested?**

3 A. The Company is requesting that the Commission grant it Certificates of
4 Convenience and Necessity under its authority pursuant to subsection 1 of § 393.170, RSMo., to
5 construct, own, and operate the Castle Bluff BESS in St. Louis County, the Huck Finn BESS in
6 Audrain County, the Millcreek BESS in Lincoln County, the Ringer Solar Energy Center in
7 Stoddard County, the Tom Sawyer Energy Center solar generating plant in Audrain County, and
8 the Quinn Switching Station to which the Millcreek BESS Project will interconnect, and requests
9 that the Commission grant the CCNs by the end of November 2026. The Company is also
10 requesting certain variances from Commission rules as set out in the Application: 20 CSR 4240-
11 20.045(5)(D) and 20 CSR 4240-20.045(3)(C) so that as-built drawings for the BESS Projects and
12 the Solar Projects can be supplied after exercise of authority under the CCN consistent with the
13 condition related to as-built drawings adopted by the Commission in File Nos. EA-2023-0286 and
14 EA-2025-0239; and 20 CSR 4240-20.045(6)(J) so that the Company's plans for restoration of safe
15 and adequate service can be provided closer to the time when the Projects will commence
16 commercial operations also consistent with the condition relating to this requirement adopted by
17 the Commission in Files No. EA-2022-0244, EA-2022-0245, EA-2023-0286, and EA-2025-0238.

18 **Q. 3. Has the Applicant met all CCN rule requirements?**

19 A. Yes. The Company's Application and supporting testimony demonstrate that
20 Ameren Missouri has met all CCN rule requirements for the Projects.

21 **Q. 4. Has the Applicant met all other filing requirements of an applicable**
22 **Commission order or rule?**

1 A. Yes. The only requirements are those in 20 CSR 4240-20.045, the applicable
2 provisions of which are addressed in the Company's Application, and the terms of the above-
3 referenced approved Solar Stipulation from File No. EA-2023-0286, which are addressed herein.

4 **Q. 5. Does the Applicant have the financial ability to construct (or purchase), own,**
5 **operate, and maintain each project?**

6 A. Yes. See my discussion above and the Direct Testimony of Company witness
7 Mitchell Lansford.

8 **Q. 6. Does the Applicant have the operational capability to construct (or**
9 **purchase), own, operate, and maintain each project?**

10 A. Yes. See my discussion above and the Direct Testimony of Company witness
11 Scott Wibbenmeyer.

12 **Q. 7. Separately for each project, is the project both important to the public**
13 **convenience and desirable for the public welfare? Or, is the project effectively a necessity**
14 **because the lack of the service is such an inconvenience?**

15 A. With respect to the Tom Sawyer, Ringer, and BESS Projects, the answers to these
16 questions are "yes," as discussed in my testimony above respecting *Tartan* Factors 1, 4, and 5, and
17 for the reasons discussed by Company witnesses Dixon, Meyer, and Michels in their Direct
18 Testimonies.

19 **Q. 8. Separately for each project, is the project of sufficient importance to**
20 **warrant the expense of making it? Or, is the project such an improvement as to justify or**
21 **warrant the expense of making the improvement?**

1 A. With respect to the Projects, the answers to these questions are "yes," as discussed
2 in my testimony above respecting *Tartan* Factors 1, 4, and 5, and for the reasons discussed by
3 Company witnesses Dixon and Michels in their Direct Testimonies.

4 **Q. 9. If applicable, are there conditions or mechanisms that can be imposed to**
5 **overcome any deficits in the answers to the prior questions?**

6 A. This item is not applicable. There are no deficiencies in the answers the Company
7 has provided.

8 **Q. 10. Has the Applicant presented an adequate direct case to demonstrate each**
9 **question enumerated?**

10 A. Yes, as demonstrated by the totality of the Company's Application and supporting
11 testimony.

12 **Q. Does this conclude your Direct Testimony?**

13 A. Yes.

