

Exhibit No.:
Issue(s): Details of Projects, Qualified to
Construct/Operate Projects
Witness: Scott Wibbenmeyer
Type of Exhibit: Direct Testimony
Sponsoring Party: Union Electric Company
File No.: EA-2026-0183
Date Testimony Prepared: May 22, 2026

MISSOURI PUBLIC SERVICE COMMISSION

File No. EA-2026-0183

DIRECT TESTIMONY

OF

SCOTT WIBBENMEYER

ON

BEHALF OF

UNION ELECTRIC COMPANY,

d/b/a Ameren Missouri

**St. Louis, Missouri
May 2026**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PURPOSE OF TESTIMONY	2
III.	THE BESS PROJECTS	4
IV.	GENERAL OVERVIEW OF THE SOLAR PROJECTS	27
V.	THE TOM SAWYER SOLAR PROJECT	29
VI.	THE RINGER SOLAR PROJECT	44
VII.	OTHER ISSUES	57
VIII.	CONCLUSION	61

DIRECT TESTIMONY
OF
SCOTT WIBBENMEYER
FILE NO. EA-2026-0183

I. INTRODUCTION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19

Q. Please state your name and business address.

A. My name is Scott Wibbenmeyer. My business address is 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and what is your position?

A. I am employed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri", or "Company") as Senior Director, Renewable Business Development and Acquisitions.

Q. Please describe your educational background and employment experience.

A. I hold a Bachelor of Science in Mechanical Engineering from the University of Missouri – Columbia. I also hold a Master of Business Administration from the University of Missouri – St. Louis. I joined Ameren Missouri in 1999. In my roles since first joining Ameren Missouri, I have served as a design engineer at the Callaway Energy Center managing projects to improve efficiency and reliability of plant equipment. Following my time at Callaway, my roles included engineering management responsibilities for maintenance, production, and turbine operations for Ameren Missouri’s fossil generation fleet. I was then promoted to General Executive of Coal Operations where I managed coal rail supply contracts. In 2007, I transferred to the renewable development

1 organization, where I led development teams for biomass, wind, and solar for Ameren
2 Missouri. In 2015, I transitioned to Insurance Risk Management where I was responsible
3 for managing financial risk and insurance portfolios. In 2019, I returned to lead the Ameren
4 Missouri renewables development and acquisitions organization.

5 **Q. What are your responsibilities in your current position?**

6 A. I am currently responsible for leading the development of renewable energy
7 generation and battery energy storage systems ("BESS") projects in support of three
8 primary goals: (a) to support Ameren Missouri's balanced generation portfolio of both
9 dispatchable and renewable energy resources by implementing the renewable and energy
10 storage components of the portfolio, which will allow Ameren Missouri to maintain the
11 reliable, resilient, and affordable generation portfolio we need to serve our customers; (b)
12 to comply with the Missouri Renewable Energy Standard; and (c) to support the
13 development of customer renewable energy solutions such as the Company's Community
14 Solar Program, Renewable Solutions Program, and Renewable Solutions – Large Load
15 Customer Program.¹

16 **II. PURPOSE OF TESTIMONY**

17 **Q. What is the purpose of your Direct Testimony?**

18 A. The purpose of my Direct Testimony is to support the Company's
19 Application for Certificates of Convenience and Necessity ("CCN") for the Castle Bluff
20 BESS Project, Huck Finn BESS Project, and Millcreek BESS Project (collectively, the
21 "BESS Projects,") as well as the Tom Sawyer Solar Project and Ringer Solar Project

¹ The Renewable Solutions – Large Load Customer Program was recently approved as part of the Commission's Order on Ameren Missouri's request for a New Modified Tariff for Service to Large Load Customers in File No. ET-2025-0184.

Direct Testimony
of Scott Wibbenmeyer

1 (collectively, the "Solar Projects," and collectively with the BESS Projects, the "Projects,")
2 that Ameren Missouri is developing to meet its resource adequacy need and the need to
3 supply low-cost energy to its customers as part of its balanced supply-side portfolio
4 consisting of dispatchable, renewable, and low-carbon generation resources. The total of
5 545 megawatts_{SAC}² ("MW") of three BESS projects and 400 MW of new solar generation
6 for which the Company seeks authorizations in this proceeding represents just under 10%
7 of the 9800 MW of new generation (solar, wind, BESS, gas combined cycle, and gas simple
8 cycle) proposed to be installed by 2035, as outlined in the Company's 2025 Preferred
9 Resource Plan ("PRP") (see File No. EO-2025-0235).

10 I will briefly address how the Projects fit into the Company's generation portfolio,
11 which was contemplated in its PRP filing in File No. EO-2025-0235 and further addressed
12 in detail in the Direct Testimonies of Company witnesses Robert B. Dixon, Matt Michels,
13 and Steven Wills filed in this docket. In addition, I will also provide a description of the
14 proposed Projects and their key project characteristics, the reasoning for their respective
15 locations, the development and construction schedules, the engineering, procurement, and
16 construction plans for the BESS Projects, and the contractual arrangements of the build
17 transfer agreement ("BTA") for the Solar Projects. In addition, I will cover the tax and
18 economic benefits of the Projects.

Q. Are you sponsoring any schedules?

19 A. Yes. For the BESS Projects, I am sponsoring the scope of work and
20 technical specifications, preliminary site layouts, and permitting matrices, and in-service

² All references to solar capacity are expressed in nominal alternating current capacity, unless otherwise specified.

Direct Testimony
of Scott Wibbenmeyer

1 criteria as listed in Table 1 below. I am also sponsoring the Solar Projects executed BTAs
2 and the technical specifications, permitting matrix, and in-service criteria.

3 **Table 1. Schedules**

Document	Number
Highly Confidential BESS Projects Scope of Work & Technical Specifications	SW-D1
Confidential Castle Bluff BESS Project Preliminary Site Layout	SW-D2
Castle Bluff BESS Project Permitting Matrix	SW-D3
Confidential Huck Finn BESS Project Preliminary Site Layout	SW-D4
Huck Finn BESS Project Permitting Matrix	SW-D5
Confidential Millcreek BESS Project Preliminary Site Layout	SW-D6
Millcreek BESS Project Permitting Matrix	SW-D7
BESS Projects In-service Criteria	SW-D8
Highly Confidential BESS Projects Site Selection Screening Results	SW-D9
Highly Confidential Tom Sawyer Solar Executed Build-Transfer Agreement	SW-D10
Tom Sawyer Solar Project Permitting Matrix	SW-D11
Solar Projects In-service Criteria	SW-D12
Confidential Tom Sawyer Solar Project Preliminary Site Layout	SW-D13
Highly Confidential Ringer Solar Executed Build-Transfer Agreement	SW-D14
Ringer Solar Project Permitting Matrix	SW-D15
Confidential Ringer Solar Project Preliminary Site Layout	SW-D16

4 **III. THE BESS PROJECTS**

5 **Q. What are the key parameters for the BESS Projects?**

6 A. Table 2 below provides a high-level summary of the key parameters for the
7 BESS Projects proposed in this case.

1

Table 2. Summary of BESS Projects

	Castle Bluff BESS	Huck Finn BESS	Millcreek BESS
Facility Size	95 MW-ac	200 MW-ac	250 MW-ac
Location	St. Louis County, MO	Audrain County, MO	Lincoln County, MO
Tax Strategy	ITC	ITC	ITC
Expected Tax Benefit³	40%	30%	30%
Land Under Control	10 Acres	22 Acres	24 Acres
Interconnection Path	Replacement Interconnection	Surplus Interconnection	Expedited Resource Addition Study Process
Interconnection Status	Generator Interconnection Agreement Executed	Surplus Interconnection Application Filed – Awaiting Study Results	Expedited Generation Interconnection Agreement Executed
Interconnection Voltage	138-kV Transmission	345-kV Transmission	161-kV Transmission
Expected In-service Date	Q2 2028	Q2 2028	Q2 2028
Base Case Cost Estimate	*** _____ ***	*** _____ ***	*** _____ ***

2 **Q. Please describe each of the BESS Projects in further detail.**

3 A. I am happy to.

4 **Castle Bluff BESS:**

5 The Castle Bluff BESS Project is a 95 MW four-hour lithium iron phosphate
6 ("LFP") BESS project located on approximately 10 acres within the same parcel of land as
7 the now-retired Meramec coal-fired facility and the to-be-constructed Castle Bluff simple
8 cycle combustion turbine generator ("CTG"), previously approved by the Missouri Public
9 Service Commission ("Commission") in File No. EA-2024-0237. The project will consist

³The Company is currently pursuing eligibility for an additional 10% Domestic Content Bonus for all three BESS Projects, which could result in an expected tax benefit of 50% for Castle Bluff BESS, 40% for Huck Finn BESS and 40% for Millcreek BESS.

Direct Testimony
of Scott Wibbenmeyer

1 of approximately 92 battery enclosure skids. Each battery enclosure skid consists of
2 battery modules and support equipment housed in specially designed outdoor rated
3 enclosures. Each container is approximately 30 feet long, six feet wide, and nine feet high.
4 The battery modules, inverters, monitoring and safety equipment, cooling equipment, and
5 controls are assembled and tested at the factory and shipped to the site within the enclosure,
6 allowing each skid to be immediately ready for installation. The battery enclosure skid
7 design is common across all three BESS Projects.⁴

8 On site, the battery skids will be placed on newly installed foundations,
9 interconnected appropriately to other battery enclosures and wired to transformers to step
10 up the 480-volt battery skid output voltage to 34.5 kilovolts (“kV”). The 34.5 kV output
11 will then be routed to the new generator step-up (“GSU”) transformer, increasing voltage
12 to 138 kV before the site is interconnected through a short lead line to the point of
13 interconnection within Ameren Missouri's existing Meramec transmission substation.

14 The project will be capable of being monitored and controlled through the
15 Company's Supervisory Control and Data Acquisition (“SCADA”) system, allowing full
16 remote operations to charge or dispatch the facility from the Company's Energy
17 Management and Trading department, similar to Ameren Missouri's other generation
18 resources.

19 Similar to the Company's Big Hollow Energy Center, which was approved by the
20 Commission earlier this year (see, File No. EA-2025-0238), the Castle Bluff BESS Project
21 utilizes the Replacement Interconnection process which permits a new generating resource

⁴ I will describe the details of the design and monitoring for the Castle Bluff BESS Project in full in this section of my testimony but will not repeat that discussion in the Huck Finn and Millcreek BESS sections of my testimony since, as noted, the design and monitoring for all three are the same.

Direct Testimony
of Scott Wibbenmeyer

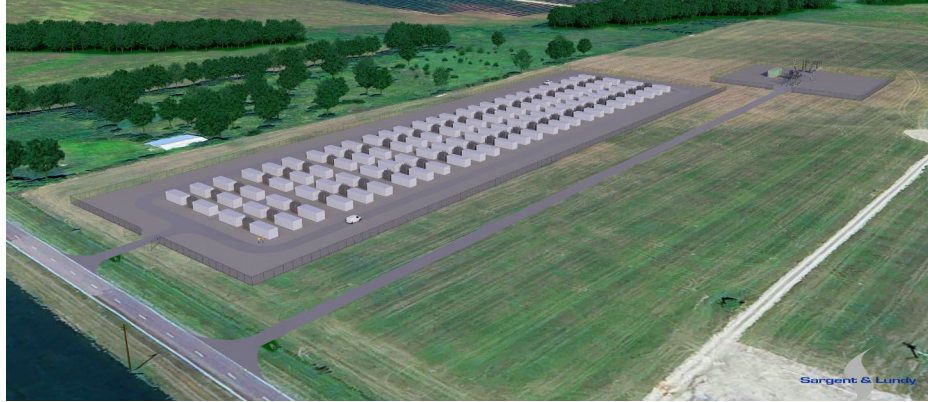
1 to replace an existing, interconnected resource at the same point of interconnection, subject
2 to confirmation that the replacement does not exceed the original interconnection rights or
3 create material new system impacts. Studies under the Replacement Interconnection
4 process are generally limited to assessing whether the new resource remains within the
5 electrical footprint of the existing facility and whether any changes in operating
6 characteristics affect reliability. The Replacement Interconnection process provides
7 significant advantages by allowing the modernization or repowering of generation facilities
8 – such as the transition from legacy thermal resources to cleaner or more efficient
9 technologies – while preserving interconnection priority and minimizing exposure to new
10 network upgrade costs. This approach supports orderly resource turnover, limits disruption
11 to the interconnection queue, and promotes system planning certainty. The replacement
12 generation interconnection studies and associated executed generator interconnection
13 agreement ("GIA") have been executed for the Castle Bluff BESS project.

14 **Huck Finn BESS**

15 The Huck Finn BESS Project is a 200 MW, four-hour LFP BESS project located
16 on approximately 22 acres on a site adjacent to the Company's existing Huck Finn Solar
17 Project and within the same parcel as the Company's existing Audrain CTG. The project
18 will consist of approximately 192 battery enclosure skids. On site, the battery skids will be
19 placed on newly installed foundations, interconnected appropriately to other battery
20 enclosures and wired to transformers to step up the 480-volt battery skid output voltage to
21 34.5 kV. The 34.5 kV output will then be routed to a new GSU transformer, increasing
22 voltage to 345 kV before the site is interconnected through a short lead line to the point of
23 interconnection at Ameren Missouri's existing Spencer Creek substation.

Direct Testimony
of Scott Wibbenmeyer

1 The Huck Finn Project will utilize Midcontinent Independent System Operator
2 ("MISO")'s Surplus Interconnection process which allows an existing interconnection
3 customer to utilize unused capacity at its point of interconnection for additional generation,
4 provided that the incremental capacity does not result in new or increased adverse impacts
5 to the transmission system. In this case, the Huck Finn BESS Project will interconnect at
6 the same Point of Interconnection as the Huck Finn Solar Energy Center: Spencer Creek
7 substation. Under this Surplus Interconnection process, MISO performs a focused
8 engineering evaluation to verify that the surplus capacity can be accommodated using the
9 existing interconnection facilities and assigned network upgrades. The Surplus
10 Interconnection process offers several important benefits, including reduced study scope,
11 lower interconnection costs, and shorter development timelines compared to the standard
12 interconnection queue. By enabling incremental resource additions without requiring
13 duplicative transmission upgrades, the Surplus Interconnection process supports efficient
14 use of existing infrastructure while maintaining system reliability and transparency,
15 especially for complimentary generation assets such as Huck Finn solar and Huck Finn
16 BESS, whereby one produces low cost reliable energy and the other can provide guaranteed
17 capacity. The Huck Finn BESS surplus interconnection application has been submitted to
18 MISO and is expected to be completed along with an executed GIA before the end of 2026.
19 See Figure 1 below for a preliminary rendering of the Huck Finn BESS Project site.



1 Figure 1: Huck Finn BESS Project (for illustrative purposes and subject to change)

2 **Millcreek BESS**

3 The Millcreek BESS Project is a 250 MW, four-hour LFP BESS project located on
4 approximately 24 acres for which the Company holds a purchase option and on which the
5 Company will close the real estate transaction upon receipt of a CCN. The project will
6 consist of approximately 240 battery enclosure skids. On site, the battery skids will be
7 placed on newly installed foundations, interconnected appropriately to other battery
8 enclosures and wired to transformers to step up the 480-volt battery skid output voltage to
9 34.5 kV. The 34.5 kV output will then be routed to the new GSU transformers, increasing
10 voltage to 161 kV before the site is interconnected through a short lead line to the point of
11 interconnection at an Ameren Missouri transmission switching station to be constructed as
12 further discussed by Ameren Missouri witness Harman Ormani.

13 The Millcreek BESS Project utilized the MISO Expedited Resource Addition Study
14 ("ERAS"), process which provides a streamlined pathway for the approval of new
15 generation needed to address the region's resource adequacy and reliability needs. The
16 principal advantage of the ERAS process is its ability to support near-term resource
17 additions, including storage and hybrid configurations, that address reliability or capacity
18 needs without requiring a full interconnection queue study. This targeted approach

Direct Testimony
of Scott Wibbenmeyer

1 preserves system reliability while offering flexibility and timely market access for
2 resources that meet defined technical constraints. The ERAS study process has been
3 completed, and the associated expedited generator interconnection agreement has been
4 executed for the Millcreek BESS project. See Figure 2 for a preliminary rendering of the
5 Millcreek BESS Project Site.



6
Figure 2: Millcreek BESS Project (for illustrative purposes and subject to change)

7 **Q. Earlier you mentioned the Castle Bluff CTG Project. How is that**
8 **related to the Castle Bluff BESS Project?**

9 A. The two projects will be independent of each other due to different designs
10 and in-service dates, but they will both take advantage of the existing Meramec
11 transmission interconnection, and both will provide dispatchable capacity on the
12 Company's system. The BESS project will be grid-connected with independent
13 interconnection rights, so the BESS can charge and discharge independently of the CTG
14 project. See Figure 3, which is a rendering of the Castle Bluff Project Site showing both
15 the CTG and BESS installations.

1



Figure 3: Castle Bluff BESS Project adjacent to CTG's (for illustrative purposes and subject to change)

2 **Q. You also mentioned the Huck Finn Solar Energy Center. How are the**
3 **Huck Finn Solar Energy Center and the Huck Finn BESS Project related?**

4 A. The Huck Finn BESS Project will interconnect to Ameren Missouri's
5 existing Spencer Creek 345 kV switching station via a 345 kV lead-line shared with the
6 Huck Finn Solar Energy Center. Although the BESS project will interconnect along the
7 same lead-line and utilize the same transmission capacity limits as the Huck Finn Solar
8 Energy Center, they are not structured as a hybrid resource. Each project is separately
9 designed, financed, and operated, and they are not electrically or operationally co-located
10 as a single hybrid facility.

11 **Q. Please describe the current state of BESS deployment in the United**
12 **States - similar to what is being installed at the Castle Bluff BESS Project, the Huck**

1 **Finn BESS Project, and the Millcreek BESS Project - and whether this is proven and**
2 **widely adopted technology.**

3 A. Utilities across the country have adopted BESS at scale, with projects
4 ranging from 50 MW to 500+ MW. This rapid adoption and growth demonstrate that BESS
5 is a proven, scalable technology – one that Ameren Missouri is well-positioned to leverage.
6 In fact, 2025 was the largest single year for battery additions on record, with the US
7 installing 57.6 gigawatt-hours (“GWh”) of new capacity, a 30% increase over 2024.⁵

8 **Q. What features make the addition of BESS ideal for Ameren Missouri's**
9 **system?**

10 A. BESS projects provide many advantages to Ameren Missouri's system due
11 to their inherent operational flexibility and fast response. They provide an immense
12 amount of optionality, allowing Ameren Missouri to meet its load needs in times of high
13 demand, especially during critical peak times in the summer or winter seasons, similar to
14 a CTG. In addition, they can be used as a tool to balance the potential mismatch between
15 the time when solar may be generating at its peak capacity, typically during the midday
16 hours, to when peak load may occur such as the later afternoon and evening hours. As more
17 solar and wind are added to the grid, this functionality will be critical to maintaining
18 reliability. Batteries play a key role in such load balancing because they can be dispatched
19 nearly instantaneously without the time needed for startup as required by fossil resources.
20 Company witnesses Matt Michels and Andrew Meyer also describe BESS project
21 advantages in their Direct Testimony.

⁵ Solar Energy Industries Association (SEIA), Energy Storage Market Outlook Q1 2026.

Direct Testimony
of Scott Wibbenmeyer

1 Balancing the installation of BESS systems with CTGs also has the advantage of
2 increasing grid reliability during load events that occur quickly, but that also turn into a
3 longer duration event. For example, if there is an event on the grid that causes a major loss
4 of generation quickly, such as the system losing a major baseload plant or wind and solar
5 production reducing quickly, the BESS system can respond almost immediately and help
6 support the grid while the CTGs are quickly ramping up.

7 Using these technologies together enables Ameren Missouri to provide an
8 excellent, ready source of peaking power for its customers and complement Ameren
9 Missouri's existing fossil fleet and its expansion of renewable generation.

10 **Q. When are the BESS Projects expected to go into operation and what**
11 **are the driving factors for this timing?**

12 A. The Castle Bluff BESS Project is anticipated to be placed in service in the
13 second quarter of 2028. There are two main drivers for the timing of the project. First, the
14 Castle Bluff BESS project will utilize Meramec's existing interconnection rights via
15 MISO's Generator Replacement Process, which allows the project to avoid the lengthy
16 MISO Large Generator Interconnection Process, thereby avoiding the associated project
17 delays and additional transmission interconnection costs for Ameren Missouri customers.
18 To utilize the existing interconnection rights, the BESS project must be placed in-service
19 by December 31, 2028.

20 Secondly, the project will meet capacity needs starting in 2028, which is also true
21 for the Huck Finn BESS Project and the Millcreek BESS Project, as discussed in greater
22 detail in the Direct Testimonies of Company witnesses Rob Dixon and Matt Michels.

1 **Q. Please describe Ameren Missouri's process for siting the proposed**
2 **BESS Projects.**

3 A. Certainly. The Company conducted a site selection screening for BESS
4 projects within Ameren Missouri's service territory to meet its energy storage needs as
5 outlined in the 2025 Ameren Missouri PRP. The results of the screening yielded a clear
6 hierarchy. The full results of the selection screening performed at that time are depicted in
7 **Highly Confidential Schedule SW-D9**. Nothing has changed since then that would alter
8 those results.

9 As **Highly Confidential Schedule SW-D9** discusses, BESS projects have a
10 significantly smaller footprint than solar and wind projects with a similar MW output.
11 Therefore, there are many available properties suitable for BESS, both Ameren Missouri-
12 owned and available for purchase. Ameren Missouri focused on properties already owned
13 by Ameren Missouri due to the number of available quality sites. We did so to avoid
14 additional land expenses and to expedite development efforts, particularly as it relates to
15 transmission interconnection. As outlined in **Highly Confidential Schedule SW-D9**, the
16 Meramec site was identified as a top candidate for a BESS project. While there were
17 several reasons for this, Meramec scored well because of its layout and available land in
18 proximity to the substation, and the ability to utilize the valuable interconnection rights at
19 Meramec without the risks or additional costs associated with a full MISO generator
20 interconnection process and corresponding interconnection system upgrades, and because
21 the BESS project qualifies for an additional 10% Energy Community Tax Credit Bonus
22 under the Inflation Reduction Act ("IRA").

Direct Testimony
of Scott Wibbenmeyer

1 The Huck Finn Solar Renewable Energy Center, located west of Vandalia, MO,
2 and adjacent to the Ameren Missouri Audrain CTG and Spencer Creek Substation,
3 represents a quality candidate for MISO's Surplus Interconnection Service. This process
4 allows new generation to be added to existing generation with an expedited study process
5 to obtain a GIA. Utilizing the existing infrastructure allows for little to no network upgrade
6 costs in a similar manner to the Replacement Generation process. Thus, the Company
7 selected this site for the Huck Finn BESS project.

8 The Millcreek Solar Energy Development, located north of Troy, MO, is a
9 greenfield site where Ameren Missouri currently holds purchase options as the Company
10 develops a possible solar site in the area. This site represents a unique opportunity to utilize
11 the new MISO ERAS process to obtain a GIA in as little as 3-4 months, avoiding the risk
12 of a MISO queue position extending the project timeline and increasing costs. Therefore,
13 the Company selected this site for the Millcreek BESS project.

14 **Q. How will Ameren Missouri develop the BESS Projects?**

15 A. The BESS Projects are being self-developed by Ameren Missouri in a
16 manner similar to how many of its generation projects have been completed and consistent
17 with methodology delineated in the recently approved Big Hollow BESS Project CCN
18 proceeding (File No. EA-2025-0238). The BESS Projects will be constructed under an
19 Engineering, Procurement and Construction ("EPC") contract as discussed later in my
20 testimony. They will also be constructed in accordance with a conformed version of the
21 specifications attached to my testimony as **Highly Confidential Schedule SW-D1**, which
22 are the Company's standard Scope of Work and Technical Specifications for a project of
23 this type.

1 **Q. Please describe how Ameren Missouri expects to execute the design,**
2 **procurement, and construction of the BESS Projects.**

3 A. *** _____
4 _____
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____ _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____ _____
22 _____
23 _____

Direct Testimony
of Scott Wibbenmeyer

1 _____
2 _____
3 _____
4 _____
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____ ***

19 **Q. Please describe how Ameren Missouri expects to execute any additional**
20 **key equipment supply contracts.**

21 A. Ameren Missouri has already completed sourcing the GSU transformers
22 and circuit breakers outside of the main EPC procurement event to mitigate the impact of
23 long lead times associated with these items, which will be provided by Ameren Missouri

1 for the BESS Projects. The remainder of the key project equipment (collector substation
2 equipment, generator tie line, operation and maintenance building, etc.) will be supplied as
3 part of the main EPC contracts.

4 **Q. Please describe the steps the Company has taken to secure long-lead**
5 **equipment.**

6 A. As mentioned, lead times for main power transformers continue to remain
7 one of the most critical long-lead equipment item challenges, taking longer than three years
8 to procure in most cases. In order to procure the transformer in a timely manner, the
9 Company leveraged existing supplier contracts to obtain the required main power
10 transformers needed for the BESS Projects. Significant consideration was given to
11 suppliers that could supply main power transformers in time for the projects and are able
12 to meet the IRS safe harbor requirement to maximize the tax credits for the projects. The
13 Company has developed and aligned on a strategy to source main power transformers that
14 are flexible in their deployment by leveraging a low impedance, bi-directional design that
15 can be used on solar and BESS projects. The transformers for the Huck Finn BESS Project
16 and the Millcreek BESS Project have both been secured with WEG Transformers USA,
17 and the transformer for the Castle Bluff BESS Project is sourced through ILGIN Electric.

18 For the required 138kV, 161kV, and 345kV circuit breakers, Ameren Missouri has
19 an existing negotiated contract with Mitsubishi Electric Power Products Inc. ("MEPPI")
20 for a certain number of production slots each year at agreed upon pricing. Ameren Missouri
21 placed a purchase order for the first circuit breaker on July 24, 2025.

22 **Q. Please summarize the status of development for the BESS Projects.**

23 A. Of course.

1 **Castle Bluff BESS Project:**

2 The Castle Bluff BESS Project has made meaningful progress in the following key
3 areas, making it a mature development project:

- 4 1. All necessary land for the project is presently owned by the Company, ensuring
5 the project footprint is secured and ready for construction activities upon receipt
6 of approval;
- 7 2. The EPC contract, along with the battery supply contract, similar to the contract
8 utilized for the Big Hollow BESS project, are nearing completion. Contract
9 execution is anticipated in the coming months, providing a clear framework for
10 project execution and indicative pricing;
- 11 3. Contracts have been issued for the GSU transformer and the 138 kV breaker;
- 12 4. The Company submitted an application for MISO's Generation Replacement
13 Process and received the results of the Replacement Impact Study indicating the
14 project will not have a material adverse impact on the Transmission System.
15 Therefore, no network upgrades are necessary. The Company executed a
16 Replacement Generator Interconnection Agreement on December 11, 2025;
- 17 5. There are no required environmental studies, surveys, or agency consultations for
18 the Castle Bluff BESS Project since the Company is re-developing a brownfield
19 site;
- 20 6. Standard engineering studies including a topographic and a preliminary
21 geotechnical study have been completed. These studies confirm the feasibility and
22 technical readiness of the site for development;

Direct Testimony
of Scott Wibbenmeyer

1 7. A conceptual design, which includes a site layout as provided in **Schedule SW-D2**
2 has been completed by the Company's independent engineering consultant, Sargent
3 and Lundy;

4 8. Standard construction related permits will be required for the project from St. Louis
5 County, the Missouri Department of Natural Resources (“MDNR”), and other
6 entities. See **Schedule SW-D3** for a list of project permits; and

7 9. The project will be constructed entirely within the boundaries of the retired
8 Meramec coal plant's parcel of land. Any utilities the project crosses are owned
9 and operated by Ameren Missouri. In addition, demolition of the existing coal plant
10 facilities will de-energize, decommission, and remove the majority of utilities
11 owned by Ameren Missouri on the plant property prior to the start of construction
12 of the BESS project.

13 **Huck Finn BESS Project:**

14 The Huck Finn BESS Project has made meaningful progress in the following key
15 areas, making it a mature development project:

16 1. All necessary land for the project is presently owned by the Company, ensuring the
17 project footprint is secured and ready for construction activities upon receipt of
18 approval;

19 2. The EPC contract, along with the associated battery supply contract, are being
20 negotiated. Contract execution is anticipated in the coming months, providing a
21 clear framework for project execution and indicative pricing;

22 3. Contracts have been issued for the GSU transformer and the 345kV breaker;

Direct Testimony
of Scott Wibbenmeyer

- 1 4. The project has submitted an application for MISO's Generation Surplus
2 Interconnection Process and expects to execute a GIA prior to the end of the year;
- 3 5. The Phase I Cultural Resources Survey has been completed with no significant
4 findings. The Company received concurrence from the State Historic Preservation
5 Office ("SHPO"). Besides the Phase I Cultural Resources Survey, no other
6 environmental studies are required based on proper siting of the Huck Finn BESS
7 Project;
- 8 6. Standard engineering studies including a topographic and geotechnical study have
9 been completed. These studies confirm the feasibility and technical readiness of the
10 site for development;
- 11 7. A conceptual design, which includes a site layout as provided in **Schedule SW-D4**,
12 has been completed by the Company's independent engineering consultant, Sargent
13 and Lundy;
- 14 8. Standard construction related permits will be required for the Project from the
15 MDNR, and other entities. See **Schedule SW-D5** for a list of project permits.

16 **Millcreek BESS Project:**

17 The Millcreek BESS Project has made meaningful progress in the following key
18 areas, making it a mature development project:

- 19 1. All necessary land for the project is presently under a purchase option in which the
20 Company will close on the real estate transaction upon receipt of CCN approval,
21 ensuring the project footprint is secured and ready for construction activities upon
22 approval;

Direct Testimony
of Scott Wibbenmeyer

- 1 2. The EPC contract, along with the associated battery supply contract, are being
2 negotiated. Contract execution is anticipated in the coming months, providing a
3 clear framework for project execution and indicative pricing;
- 4 3. Contracts have been issued for the GSU transformer and a slot reservation for the
5 161 kV circuit breaker has been secured;
- 6 4. The project has submitted an application for MISO's Expedited Resource Addition
7 ERAS process and has received System Impact Study results indicating
8 approximately ** _____ ** in network upgrades. The project executed an
9 Expedited Generator Interconnection Agreement ("EGIA") in Q1 2026;
- 10 5. Standard environmental studies, including a Critical Issues Analysis, Phase I
11 Environmental Site Assessment, and wetland delineation, have been completed. These
12 studies confirm little to no environmental impact;
- 13 6. Standard engineering studies including topographic and geotechnical study are
14 currently in progress. These studies will confirm the feasibility and technical
15 readiness of the site for development;
- 16 7. A conceptual design, a site layout as provided in **Schedule SW-D6**, has been
17 completed by the Company's independent engineering consultant, Sargent and
18 Lundy; and
- 19 8. Standard construction-related permits will be required for the Project from the
20 MDNR and other entities. See **Schedule SW-D7** for a list of Project permits;

21 **Q. What is the expected total cost of the BESS Projects, including the EPC**
22 **contract and all equipment supply agreements?**

1 **Q. Please address procurement/construction-related risks.**

2 A. As noted, a key risk for the BESS Projects is successfully negotiating the
3 remaining EPC contracts along with the associated battery supply contracts to ensure
4 timely project execution while also navigating the volatile market. Ameren Missouri has
5 mitigated this risk by leveraging the Big Hollow BESS Project competitive bid RFP
6 process and is continuing to do so via engagement with *** _____ ***, each
7 of whom has experience contracting with Ameren Missouri. The Company is working with
8 leading suppliers in the BESS industry. This mitigation has allowed advanced coordination
9 with project teams, detailed scope clarity with the selected contractors, and improved the
10 sequencing of equipment orders and construction activities. Furthermore, this has allowed
11 Ameren Missouri to select the key EPC contractor in sufficient time to support ordering
12 battery and balance of plant equipment by mid-2026 to maintain Q2 2028 in-service dates.

13 **Q. Please address potential change in law/tariff risks.**

14 A. As referenced above, another key risk associated with BESS Projects is
15 related to supply risks and changes in laws/tariffs. Ameren Missouri has engaged a leading
16 EPC and a battery supplier that actively seek a diverse mix of cell suppliers to mitigate any
17 issues with obtaining adequate supply within the United States and globally. These
18 companies have been in the battery industry for years or decades and continue to
19 successfully navigate the challenging lithium-ion BESS market and its volatility. This
20 includes domestic supply of battery cells to establish a local supply of cells and to mitigate
21 tariff risks associated with Chinese-made cells.

22 In addition, Ameren Missouri continues to leverage its market intelligence partners
23 to stay on top of market trends and changes throughout the project life cycle *** _____

1

2

3

***.

4

Q. Please address risks associated with thermal runaway for BESS projects.

5

6

A. The BESS units are equipped with integrated monitoring and battery management systems (“BMS”) that continuously track cell performance, temperature, voltage, state of charge, and other critical parameters in order to prevent or mitigate thermal runaway. These systems are designed to autonomously respond to fault conditions such as over-temperature, over-voltage, communication loss, or electrical anomalies. Cooling mechanisms are activated to prevent thermal runaway or limit its spread, and affected modules can be isolated either temporarily or permanently depending on the severity of an issue.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

In the case of a thermal runaway event, fire safety for the BESS Projects will be managed using a strategy that reflects current industry standards and lessons learned from past incidents. Rather than relying on sprinkler or misting systems, which have proven ineffective for extinguishing lithium-ion battery fires, and which can create water management challenges, the approach emphasizes minimal water application. In the event of a thermal runaway, manual hose lines may be used defensively to protect surrounding equipment and limit water volume, thereby reducing environmental impact and keeping first responders at a safe distance, but the BESS container will be allowed to consume itself as designed.

Direct Testimony
of Scott Wibbenmeyer

1 To further mitigate fire or explosion risks, the system includes explosion control
2 features such as pressure-sensitive vents and early ignition devices that prevent the buildup
3 of flammable gases. These components help maintain enclosure integrity and direct
4 combustion byproducts safely up and away from personnel and adjacent equipment. The
5 design, which includes adequate separation between containers, also ensures that fire
6 events are contained within the unit, minimizing the risk of propagation.

7 **Q. Please elaborate on the tax credits Ameren Missouri is pursuing for**
8 **each of the BESS Projects.**

9 A. The Section 48E clean electricity investment tax credit, introduced by
10 the Inflation Reduction Act of 2022, provided an investment tax credit (“ITC”) for energy
11 storage technologies, including batteries. On July 4, 2025, President Trump signed into law
12 the One Big Beautiful Bill Act (H.R. 1 119th Congress) (“OBBBA”). The OBBBA
13 included several modifications to Section 48E, including early termination for wind and
14 solar, an earlier phaseout for other technologies, adjustments to the domestic content
15 requirements, and the introduction of Foreign Entity of Concern (“FEOC”) restrictions.

16 That said, the early termination driven by project "begin construction" and "placed
17 in service" deadlines do not apply to battery energy technology. Battery energy storage
18 projects can qualify for the full 30% tax credit by meeting prevailing wage and
19 apprenticeship requirements so long as they begin construction prior to or during 2033.

20 The FEOC restrictions generally apply to battery storage projects for which
21 construction begins after December 31, 2025. For projects starting construction in 2026, at
22 least 55% of manufactured products used in the battery storage project must not be from a
23 Prohibited Foreign Entity.

1 Additionally, projects can qualify for an additional 10% tax credit bonus if the
2 project uses U.S.-sourced steel, iron, or manufactured products. As well as an additional
3 10% for projects located in former fossil fuel employment zones – such as the former
4 Meramec Energy Center.

5 The Company is pursuing use of the ITC for the BESS Projects and currently
6 expects that each project will be eligible for the base 30% ITC. For the Castle Bluff BESS
7 Project, the Company expects an additional 10% Energy Community Bonus given its
8 location at the former Meramec Energy Center. While the Company cannot guarantee the
9 10% Domestic Content Bonus, the Company is pursuing the Domestic Content
10 requirements under the Battery Supply Agreement with the supplier. These tax credit
11 incentives can be stacked with the total potential to take advantage of a 50% ITC for the
12 Castle Bluff BESS Project and 40% ITC for the Huck Finn BESS Project and the Millcreek
13 BESS Project.

14 **Q. How will the tax credits associate with the BESS Projects benefit**
15 **Ameren Missouri customers?**

16 A. The ITC associated with the BESS Projects will directly benefit customers,
17 translating into lower rates or avoided cost increases as compared to the impact of the
18 project absent the tax credits. The savings generated by these tax credits are factored into
19 the ratemaking process as they will be captured in the IRA tracker agreed upon by the
20 parties to and approved by the Commission in File No. ER-2022-0337, ensuring that the
21 financial benefits flow directly to Ameren Missouri customers in the form of reduced rates.

22 **IV. GENERAL OVERVIEW OF THE SOLAR PROJECTS**

23 **Q. What are the key parameters of the Solar Projects?**

1 **V. THE TOM SAWYER SOLAR PROJECT**

2 **Q. Please describe the Tom Sawyer Solar Project in greater detail.**

3 A. The Tom Sawyer Solar Project is a ground-mounted, single-axis tracking
4 photovoltaic solar generation plant and associated facilities with a capacity of
5 approximately 175 MW. Its estimated annual production of energy is approximately
6 380,000 megawatt-hours ("MWh") and the expected asset life of the solar facility is 30
7 years or more. The Project will be located in Audrain County, Missouri on approximately
8 1,200 acres adjacent to the presently operational Huck Finn Solar Energy Center ("Huck
9 Finn"). The point of interconnection will be through a new lead-line to Ameren Missouri's
10 existing Huck Finn Solar Substation where it will ultimately connect to Ameren Missouri's
11 existing Spencer Creek 345 kV switching station via sharing the 345 kV generator lead-
12 line previously installed for Huck Finn.

13 **Q. How will the Tom Sawyer Solar Project be developed?**

14 A. As detailed in the BTA, the Project is being developed by EDF power
15 solutions Development, Inc. ("EDF") through a special purpose entity known as Tom
16 Sawyer Solar, LLC. Upon completion of the project, EDF will sell its 100% interest in
17 Tom Sawyer Solar, LLC, to Ameren Missouri, at which time the completed Project and all
18 its assets will merge into Ameren Missouri. EDF is a well-established renewable generation
19 developer with over 23 gigawatts ("GW") of wind and solar projects under operation,
20 construction, or contract, and was also the developer of the Huck Finn Solar Energy Center
21 the Commission approved in February 2023 (see File No. EA-2022-0244).

1 **Q. Please outline the basic contractual arrangements between Ameren**
2 **Missouri and EDF for the Tom Sawyer Solar Project.**

3 A. As discussed above, the Company will acquire Tom Sawyer Solar, LLC and
4 all project assets from EDF through a BTA, under which ownership of Tom Sawyer Solar,
5 LLC will transfer to the Company at Mechanical Completion.

6 Tom Sawyer Solar, LLC, during the development and construction process, will
7 ultimately acquire all of the property and other rights needed for the project, including
8 equipment other than purchaser-supplied equipment (i.e., 345 kV breakers), land rights,
9 transmission agreements, and permits needed for the construction and operation of the
10 project. All land rights for the project have been acquired.

11 **Q. Can you outline the key terms under the BTA for the Tom Sawyer**
12 **Project?**

13 A. Yes, key terms are as follows: The BTA is between Union Electric
14 Company d/b/a Ameren Missouri ("Purchaser") and EDF power solutions Development,
15 LLC (the "Seller"). Seller, through a special purpose entity known as Tom Sawyer Solar,
16 LLC (the "LLC") will develop, construct, and sell the Project to Purchaser. The executed
17 agreement is attached as **Highly Confidential Schedule SW-D10**. Ameren Missouri will
18 financially close on the project and acquire the assets outlined above upon achieving the
19 conditions set forth in the BTA. The Firm Date and Closing Date Conditions establish the
20 obligations for both parties prior to the financial close. The most notable conditions
21 include:

- 22 • Issuance of the CCN approval by the Commission
- 23 • Executed Generator Interconnection Agreement

Direct Testimony
of Scott Wibbenmeyer

- 1 • Interconnection Costs do not exceed the Interconnection Cost Cap
- 2 • No Change in Tax Law
- 3 • Permits, Environmental Studies, ALTA Survey and Title Policy have been obtained
- 4 • *** _____
- 5 _____
- 6 _____
- 7 ○ _____
- 8 _____
- 9 _____
- 10 _____
- 11 _____
- 12 _____
- 13 _____
- 14 _____
- 15 _____
- 16 _____
- 17 _____
- 18 _____
- 19 _____
- 20 _____
- 21 _____
- 22 _____
- 23 _____

Direct Testimony
of Scott Wibbenmeyer

1 _____

2 _____

3 _____

4 _____

5 _____

6 ○ _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 ● _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

Direct Testimony
of Scott Wibbenmeyer

- 1 _____
- 2 _____
- 3 _____
- 4 • _____
- 5 _____
- 6 _____
- 7 _____
- 8 • _____
- 9 _____
- 10 ○ _____
- 11 _____
- 12 _____
- 13 _____
- 14 ○ _____
- 15 _____
- 16 _____
- 17 ○ _____
- 18 _____ ***

19 **Q. Please describe the RFP process that is used to competitively procure**
20 **solar resources for Ameren Missouri.**

21 A. As part of its ongoing resource planning efforts, Ameren Missouri
22 periodically evaluates market-based options to support the competitive and cost-effective
23 addition of renewable generation to its portfolio. In June 2022, the Company issued a

Direct Testimony
of Scott Wibbenmeyer

1 confidential RFP with the assistance of an independent third-party advisor, 1898 & Co.
2 (“1898”), a subsidiary of Burns and McDonnell. The purpose of the RFP was to obtain
3 transparent, competitive market information from qualified developers to inform the
4 Company’s evaluation of renewable resource options.

5 Ameren Missouri worked with 1898 throughout the RFP process, including
6 development of the solicitation materials, bid evaluation, and market assessment. 1898 has
7 extensive experience providing engineering, consulting, and RFP support services for
8 renewable energy projects and has assisted Ameren Missouri with multiple renewable
9 resource solicitations.

10 The June 2022 RFP solicited proposals for wind and solar generation projects and
11 allowed for a range of commercial structures, including development transfer agreements,
12 build-transfer agreements, and asset purchases.

13 **Q. For the project acquisition RFP issued in 2022, what were the selection**
14 **criteria Ameren Missouri used in the evaluation of the RFP bids?**

15 A. Similar to past practice and with the support of 1898 and Co., the categories
16 applied for the selection of projects to be considered were as follows: project size, location,
17 ownership arrangements, project maturity, developer experience, technology and project
18 performance, transmission interconnection criteria, constructability, locational market
19 pricing, project pricing, tax credit qualification, status of acquisition of required land rights,
20 status of environmental studies, and response to the form agreements included with the
21 RFP. As earlier noted, all, or nearly all, of these criteria were applied to the projects that
22 were initially bid. Upon initial target screening, further due diligence was conducted on
23 each of these key areas to reach a smaller subset of projects as discussed below. It should

Direct Testimony
of Scott Wibbenmeyer

1 also be noted that while numerous factors as listed above were reviewed, no one factor can
2 be considered in isolation in the selection of a renewable energy project, and the overall
3 economics, feasibility, and risks of a project were considered holistically through the
4 evaluation process.

5 **Q. In the 2022 RFP, what responses were received?**

6 A. The Company received responses from 17 bidders, including a bid from
7 EDF for the Tom Sawyer Solar Project. The 17 bidders proposed a total of 30 different
8 projects, with an aggregate capacity of approximately 7,000 MW. *** _____
9 _____ ***

Q. How did the 2022 RFP process proceed after the bids were received?

10 A. From approximately August 2022 to January 2023, the Company, again
11 with help from 1898, examined the bids for the 30 projects and engaged in a screening
12 evaluation of each response using certain selection criteria. 1898, in conjunction with the
13 Company's subject matter experts, utilized an updated scorecard initially created as part of
14 an earlier 2020 RFP process to evaluate and document the selection criteria.

15 As a result of this initial scorecard evaluation process, the Company narrowed its
16 consideration to a total of 14 projects proposed by eight different developers as follows:

17 *** _____
18 _____
19 _____
20 _____
21 _____
22 _____ ***

1 In the fall of 2022, the Company began discussions and diligence efforts with all
2 eight developers. Based on this diligence and subsequent contract negotiations, Ameren
3 Missouri identified EDF's Tom Sawyer Solar Project as one of the most attractive
4 Missouri-based projects, receiving one of the highest overall evaluation scores. Given its
5 strong relative ranking, confirmed development status, and favorable contractual terms, the
6 Tom Sawyer Solar Project was selected. The remaining projects that have not been
7 canceled or withdrawn from the market continue to be evaluated and may be considered
8 for future use as they mature, subject to ongoing availability.

9 **Q. How did Ameren Missouri ultimately determine to proceed with the**
10 **Tom Sawyer Solar Project?**

11 A. The Tom Sawyer Solar Project emerged as a desirable project based on
12 location, size, and timeline for completion. Additionally, the success of the Huck Finn
13 Solar Energy Center, a sister project located adjacent to Tom Sawyer Solar Project, and
14 also developed by EDF, has created a strong foundation for the Tom Sawyer Solar Project
15 through the good working relationship that has been established between Ameren Missouri
16 and EDF.

17 The Tom Sawyer Solar Project is in an advanced stage of development and
18 possesses several attributes that support Ameren Missouri's resource needs. The project is
19 located in Missouri on terrain well suited for solar generation, which is expected to support
20 strong and reliable energy output, simplify land use considerations, and minimize
21 environmental impacts, thereby reducing development risk and overall project cost. In
22 addition, the project's contiguous land configuration enables an efficient facility layout,
23 supporting both operational efficiency and energy production potential. The project is also

1 expected to qualify for significant federal tax credits, which will reduce the ultimate cost
2 to Ameren Missouri's customers.

3 **Q. What do you estimate the total project costs to be for the Tom Sawyer**
4 **Solar Project?**

5 A. For the Tom Sawyer Solar Project, the base case project cost estimate is
6 *** _____ *** and the risk-adjusted cost estimate is *** _____ ***; both
7 include the cost for the solar project covered under the BTA as well as the cost of the
8 anticipated transmission, affected systems, interconnection facilities, and network
9 upgrades per the MISO interconnection queue process. Several of the risks that drive the
10 risk-adjusted cost estimate are identified and discussed later in my testimony, and overall
11 project economic modeling and results are presented in the Direct Testimony of Company
12 witness Matt Michels.

13 **Q. Can you please provide an overview of the status of development for**
14 **the Tom Sawyer Solar Project?**

15 A. The Tom Sawyer Solar Project has made meaningful progress in the following
16 key areas of development:

- 17 1. All necessary land for the project is under lease, easement or purchase option, ensuring
18 the project footprint is locked and ready for construction activities upon receipt of
19 CCN approval;
- 20 2. The EPC contractor and module supply contracts have been evaluated by EDF,
21 providing a clear framework for project execution and indicative pricing;

Direct Testimony
of Scott Wibbenmeyer

- 1 3. The project has received its draft definitive planning phase 2 ("DPP 2") interconnection
2 study results from the MISO.⁷ This milestone provides insight into interconnection
3 requirements and cost allocations.
- 4 4. Manufacturing of the GSU transformer conservator tank was completed in 2025,
5 enabling the project to qualify for the ITC, provided it is placed in service by the
6 end of 2029.
- 7 5. Standard environmental studies including a Critical Issues Analysis, Phase I
8 Environmental Site Assessment, Threatened and Endangered ("T&E") Habitat
9 Assessment, desktop cultural resources review, and wetland delineation have been
10 completed. These studies confirm little to no impact to cultural resources or the
11 environment are expected.
- 12 6. Standard engineering studies including geotechnical, hydrology, and structural
13 assessments have been completed. These studies confirm the feasibility and technical
14 readiness of the site for development.
- 15 7. EDF has completed a preliminary site layout and provided the Company with a PVsyst
16 Report, which has been validated by the Company's third-party technical consultant
17 and found to be within reason, based on the preliminary design submitted and the
18 available solar resource for each location.
- 19 8. The Tom Sawyer Solar Project is in Audrain County, Missouri, which is an un-zoned
20 county. EDF has obtained a "Letter of No Zoning" stating that no local permits are
21 required for the construction of the project. However, there are standard construction

⁷ The DPP of the Generator Interconnection Process consists of three stages (DPP 1, 2, and 3) and involves detailed studies and assessments to ensure the feasibility and impact of the proposed interconnection. As projects advance throughout the process, more robust and complex assessments are conducted in order to identify potential constraints and determine necessary upgrades to ensure reliable connection. Throughout each phase, cost estimates are continuously refined ensuring that all technical and financial aspects are thoroughly evaluated before moving forward with the interconnection.

Direct Testimony
of Scott Wibbenmeyer

1 permits that the Company expects to obtain prior to construction. The project
2 permitting matrix is attached as **Schedule SW-D11**. The permitting matrix attached
3 includes the standard local, state, and federal permits and approvals that the Tom
4 Sawyer Solar Project expected to receive as part of development and construction.

5 9. Audrain County and EDF have executed a decommissioning plan, road use agreement
6 and closed a Chapter 100 agreement for the Tom Sawyer Solar Project. The Chapter
7 100 agreement will deliver millions of dollars in benefits to the local community over
8 the life of the project while ensuring compliance with applicable community standards,
9 including setback and screening requirements. In addition, the decommissioning plan
10 provides detailed provisions and assurances regarding the proper removal of the project
11 at the end of its operational life.

12 **Q. Has Ameren Missouri identified potential risks to the Tom Sawyer**
13 **Solar Project?**

14 A. Yes, all projects carry risks, and that is true for the Tom Sawyer Solar
15 Project. The identified risks for the Project are related to the generator interconnection
16 process, change in law/tariffs, and construction/procurement.

17 **Q. Has the Company put plans in place to mitigate these risks?**

18 A. Yes. The Company has maintained favorable contract terms to ensure
19 project risks are reduced or eliminated through the strategies listed below.

20 Regarding interconnection risks, the MISO generator interconnection process has
21 prolonged generation development and created delays now averaging four to five years.
22 Such delays can have significant impacts on project schedules and costs. For example, if
23 the transmission interconnection studies are delayed, this in turn causes uncertainty in the
24 ability to interconnect the project and in the cost associated with the interconnection,

Direct Testimony
of Scott Wibbenmeyer

1 delaying equipment procurement and preventing cost certainty. The Tom Sawyer Solar
2 Project entered the MISO queue in 2021 and is in the Central DPP-2021-Cycle. EDF
3 received DPP 2 results in November 2025, with DPP 3 results expected in June 2026, and
4 GIA execution expected in October 2026⁸. Since the project is still in the DPP stages of
5 the interconnection process, continued interconnection delays could impact the project
6 schedule, ultimately affecting the certainty of the commercial operation date. Additionally,
7 with the completion of each DPP study, the interconnection costs become more certain,
8 and it is possible that these costs increase or decrease from the initial estimate provided.

9 Interconnection risk is managed and mitigated through the Company's obligations and
10 rights under the BTA. *** _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____ ***

17 As for tariff risks, the U.S. Department of Commerce has launched, and is expected to
18 continue to launch, anti-dumping circumvention investigations of solar panel modules and
19 components being imported into the United States. In addition, the Trump administration
20 has announced several tariffs on equipment and materials. To help manage the primary
21 tariff exposure for the project, risk is managed through the obligations and rights within

⁸ MISO DPP Schedule dates are as of May 1, 2026. Please see the most recent [MISO DPP Schedule](#) for more information.

Direct Testimony
of Scott Wibbenmeyer

1 the BTA. *** _____

2 _____

3 _____

4 _____

5 _____

6 _____

7 _____ ***

8 Regarding construction and procurement risks, *** _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____ ***

17 **Q. For which federal tax incentives does Ameren Missouri expect the**
18 **project to qualify?**

19 A. In August 2022, the IRA became federal law. Among its many impacts, the
20 IRA extensively modified provisions of the tax code for renewable energy projects. The
21 IRA extended both the ITC and production tax credit ("PTC"), created additional wage and
22 apprenticeship ("W&A") requirements that projects must meet to qualify for the full ITC
23 or PTC value, and added additional bonus credit amounts for domestic content and for

Direct Testimony
of Scott Wibbenmeyer

1 projects located in an energy community (i.e., a brownfield site, retired coal generating site
2 or an area with significant previous employment related to oil, gas, or coal activities). The
3 passage of the IRA enables solar projects to utilize the PTC or the ITC (previously solar
4 projects could only elect the ITC) and allows federal taxpayers the ability to transfer tax
5 credits to unrelated parties for cash. This both expands and improves the available tax credit
6 and financing options for a utility-scale solar project such as the Tom Sawyer Solar
7 Project.

8 Ameren Missouri's current expectation is that the Tom Sawyer Solar Project will
9 be eligible for either the PTC or 30% ITC, giving Ameren Missouri the choice of which
10 credit to utilize.

11 **Q. What tax strategy do you expect the Company to pursue for the Tom**
12 **Sawyer Solar Project?**

13 A. Because it is expected to provide the most value for our customers, we
14 expect to use the 30% ITC available for the Tom Sawyer Solar Project. That expectation
15 is based on an economic analysis comparing the relative value and risks under both the
16 PTC and ITC scenarios, which supports use of the ITC selection option. While the
17 Company's base financial model assumes qualification for the ITC, it will remain flexible
18 and will ultimately pursue the approach that delivers the greatest certainty and value to
19 Missouri customers, including by re-evaluating our current expectation to use the 30% ITC
20 close to the time when the tax credit election must be made, which will occur closer to the
21 anticipated in-service date of the project.

22 **Q. How will the tax credits associate with the project benefit Ameren**
23 **Missouri customers?**

Direct Testimony
of Scott Wibbenmeyer

1 A. Similar to the BESS projects, the ITC associated with the Tom Sawyer Solar
2 Project will directly benefit customers, translating into lower rates (or avoid) cost increases
3 as compared to the economic impact of the project, absent the tax credits. The savings
4 generated by these tax credits are factored into the rate-making process and are assumed to
5 be captured in the IRA tracker agreed upon by the parties to and approved by the
6 Commission in File No. ER-2022-0337, ensuring that the financial benefits flow directly
7 to Ameren Missouri customers in the form of reduced rates.

8 **Q. You indicated you expect the Project to qualify for the 30% ITC. Does**
9 **that remain true given the recently-passed One Big Beautiful Bill Act?**

10 A. Yes. As earlier noted, the OBBBA modified Sections 48E and 45Y of the
11 Internal Revenue Code by establishing new “begin construction” and placed in service
12 deadlines, adjusting domestic content requirements, and introducing FEOC restrictions.
13 Under the OBBBA, solar projects that begin construction on or before July 4, 2026 may
14 qualify for tax credits if they are placed in service within four years of the year construction
15 begins. FEOC restrictions generally apply to projects that begin construction after
16 December 31, 2025.

17 For purposes of these rules, a project may establish the beginning of construction
18 by satisfying the IRS “Physical Work Test,” which includes off-site physical work of a
19 significant nature on integral project components, such as transformers. The Tom Sawyer
20 Solar Project entered into a binding Electrical Transformer Supply Agreement on
21 December 17, 2025, and qualifying physical work was completed by December 31, 2025.
22 Accordingly, construction is deemed to have begun in 2025, and the Project is expected to
23 have until December 31, 2029 to be placed in service while preserving eligibility for the

Direct Testimony
of Scott Wibbenmeyer

1 30% ITC, subject to satisfaction of applicable continuity and prevailing wage and
2 apprenticeship requirements and barring any new changes in law or impacts from future
3 Treasury and IRS guidance.

4 **Q. Are there any additional bonus tax credits beyond the base 30% ITC**
5 **for which the Tom Sawyer Solar Project could qualify?**

6 A. Yes. Projects that meet certain domestic equipment supply arrangements
7 can qualify for an additional 10% ITC on top of the 30% ITC discussed earlier. For the
8 Tom Sawyer Solar Project to qualify, all structural steel used in the project (such as rebar,
9 piles, tracker torque tubes, etc.) must be domestically manufactured. Additionally, the
10 project must meet a Domestic Cost Percentage Threshold, meaning that manufactured
11 products (like solar modules, inverters, transformers, etc.) used for the project must account
12 for 45% of the total project costs, based on a beginning-of-construction-year of 2025, such
13 as that of the Tom Sawyer Solar Project. Currently, not all equipment supply agreements
14 have been issued for the project, and due to the uncertainty and risks related to equipment
15 supply, the 10% domestic content bonus credit is not guaranteed. However, the BTA
16 contemplates that EDF shall use commercially reasonable efforts to secure pricing
17 proposals for each of the applicable material project contracts under which the Tom Sawyer
18 Solar Project will procure equipment to be installed. The use of domestically manufactured
19 materials can sometimes lead to pricing fluctuations based on variable costs and
20 availability, potentially impacting the eventual cost that customers inherit. However,
21 Ameren Missouri will ultimately pursue the approach that delivers the greatest value to
22 Missouri customers.

23 **VI. THE RINGER SOLAR PROJECT**

1 **Q. Please describe the Ringer Solar Project in greater detail.**

2 A. The Ringer Solar Project is a ground-mounted, single-axis tracking
3 photovoltaic solar generation plant and associated facilities with a capacity of
4 approximately 225 MW. Its estimated annual production of energy is approximately
5 490,000 MWh and the expected asset life of the solar facility is 30 years or more. The
6 Project will be located in Stoddard County, Missouri on approximately 3,900 acres of land.
7 The point of interconnection will be to Ameren Missouri's future Vanduser (161 kV)
8 substation for which the Company was previously granted a CCN in File No. EA-2026-
9 0018.

10 **Q. How will the Ringer Solar Project be developed?**

11 A. As detailed in the BTA, the project is being developed by Invenergy
12 Renewables Global LLC ("Invenergy") through a special purpose entity known as Ringer
13 Solar Energy, LLC (the Project Company). Upon completion of the project, Invenergy will
14 sell its 100% interest in Ringer Solar Energy, LLC to Ameren Missouri, at which time the
15 completed project and all its assets will merge into Ameren Missouri. Invenergy is a well-
16 established renewable generation developer with over 29 GW of wind and solar projects
17 under operation, construction, or contract, and was also the developer of the Boomtown
18 Solar Energy Center and the Split Rail Solar Energy Center the Commission previously
19 approved (see File Nos. EA-2022-0244 and EA-2023-0286).

20 **Q. Please outline the basic contractual arrangements between Ameren**
21 **Missouri and Invenergy for the Ringer Solar Project.**

22 A. As discussed above, the Company will acquire Ringer Solar
23 Energy, LLC and all its project assets from Invenergy through a BTA, under which

Direct Testimony
of Scott Wibbenmeyer

1 ownership of Ringer Solar Energy, LLC will transfer to the Company at Mechanical
2 Completion.

3 Ringer Solar Energy, LLC, during the development and construction process, will
4 ultimately acquire all of the property and other rights needed for the project, including
5 equipment other than purchaser-supplied equipment, land rights, transmission agreements,
6 and permits needed for the construction and operation of the project. All land rights for the
7 project have been acquired.

8 **Q. Can you outline the key terms under the BTA for the Ringer Project?**

9 A. Yes, key terms are as follows: The BTA is between Union Electric
10 Company d/b/a Ameren Missouri (as "Purchaser") and Ringer Solar Holdings LLC (as the
11 "Seller"). Ringer Solar Holdings LLC is a special purpose wholly owned subsidiary of
12 Invenergy. Seller, through a special purpose entity known as Ringer Solar Energy, LLC
13 (the "LLC") will develop, construct, and sell the Project to Purchaser. The executed
14 agreement is attached as **Highly Confidential Schedule SW-D14**. Ameren Missouri will
15 financially close on the project and acquire the assets outlined above upon achieving the
16 conditions set forth in the BTA. The Firm Date and Closing Date Conditions establish the
17 obligations for both parties prior to the financial close. The most notable conditions and
18 key terms include:

- 19
- Issuance of the CCN approval by the Commission
 - 20 • Federal Energy Regulatory Commission ("FERC") Waiver to extend the
21 commercial operation date deadline of the executed GIA
 - 22 • No Change in Tax Law
 - 23 • Project costs do not exceed certain contractual thresholds

Direct Testimony
of Scott Wibbenmeyer

1 _____

2 _____

3 _____

4 _____

5 ○ _____

6 _____

7 _____

8 _____

9 _____

10 _____

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 ● _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

Direct Testimony
of Scott Wibbenmeyer

1 _____
2 _____
3 • _____
4 _____
5 _____
6 _____
7 • _____
8 _____
9 ○ _____
10 _____
11 _____
12 ○ _____
13 _____
14 _____
15 _____
16 ○ _____
17 _____
18 ○ _____
19 _____ ***

20 **Q. Similar to the Tom Sawyer Solar Project, was the Ringer Solar Project**
21 **selected as a result of an RFP that the Company issued as previously described?**

22 A. Yes. Alongside Tom Sawyer Solar, Ringer Solar was also identified as one
23 of the top Missouri-based projects in the 2022 RFP results. Subsequently the company

Direct Testimony
of Scott Wibbenmeyer

1 issued an additional solar project RFP in 2025. The 2025 RFP event followed the same
2 process as outlined previously for the 2022 RFP event and used a similar scorecard and
3 evaluation process. In the 2025 RFP, the Company received responses from 34 bidders,
4 including a bid from Invenergy for the Ringer Solar Project. The 34 bidders proposed a
5 total of 95 different projects, with an aggregate capacity of approximately 15,000 MW.
6 The remaining projects from the 2025 RFP that have not been canceled or withdrawn from
7 the market continue to be evaluated and may be considered for future use as they mature,
8 subject to ongoing availability.

9 **Q. How did Ameren Missouri ultimately determine to proceed with the**
10 **Ringer Solar Project?**

11 A. Based on the preliminary diligence from the 2025 RFP process and
12 subsequent contract negotiations, the Company identified Invenergy's Ringer Solar Project
13 as one of the most attractive Missouri-based projects, receiving one of the highest overall
14 evaluation scores. Given its strong relative ranking, confirmed development status, and
15 favorable contractual terms, the Ringer Solar Project was selected. Additionally, the
16 success of the Boomtown and Split Rail Solar Energy Centers, also developed by
17 Invenergy, has created a strong foundation for the Ringer Solar Project through the good
18 working relationship established between Ameren Missouri and Invenergy.

19 The Ringer Solar Project is in an advanced stage of development – which includes
20 having already received an executed GIA – and possesses several other attributes that
21 support Ameren Missouri's resource needs. The project is located in Missouri on terrain
22 well suited for solar generation, which is expected to support strong and reliable energy
23 output, simplify land use considerations, and minimize environmental impacts, thereby

1 reducing development risk and overall project cost. The project is also expected to qualify
2 for significant federal tax credits, which will reduce the ultimate cost to Ameren Missouri's
3 customers.

4 **Q. What do you estimate the total project costs to be for the Ringer**
5 **Solar Project?**

6 A. For the Ringer Solar Project, the base case project cost estimate is
7 *** _____ *** and the risk-adjusted cost estimate is *** _____ *** ; both
8 include the cost for the solar project covered under the BTA as well as the cost of the
9 transmission interconnection facilities, affected systems, and network upgrades per the
10 MISO interconnection queue process. Several of the risks that drive the risk-adjusted cost
11 estimate are identified and discussed later in my testimony, and overall project economic
12 modeling and results are presented in the Direct Testimony of Company witness Mr.
13 Michels.

14 **Q. Can you please provide an overview of the status of development for**
15 **the Ringer Solar Project?**

16 A. The Ringer Solar Project has made meaningful progress in the following key
17 areas of development:

- 18 1. All necessary land for the project is under lease, easement, or purchase
19 option, ensuring the project footprint is locked and ready for construction
20 activities upon receipt of CCN approval;
- 21 2. EPC contractor and module supply contracts are being evaluated by
22 Invenergy, providing a clear framework for project execution and indicative
23 pricing;

Direct Testimony
of Scott Wibbenmeyer

- 1 3. The project has received its GIA, a key milestone in the development
2 process;
- 3 4. Standard environmental studies including a Critical Issues Analysis, Phase
4 I Environmental Site Assessment, Site Characterization Study (including a
5 desktop and reconnaissance evaluation of threatened and endangered
6 species and habitat suitability), desktop Cultural Resources Review, and
7 Wetland Delineation have been completed. These studies confirm little to
8 no impact to cultural resources or the environment are expected;
- 9 5. Standard engineering studies including geotechnical, hydrology, and
10 structural assessments have been completed. These studies confirm the
11 feasibility and technical readiness of the site for development;
- 12 6. Invenergy has completed a preliminary site layout and provided the
13 Company with a PVsyst Report, which has been validated by the
14 Company's third-party technical consultant and found to be within reason,
15 based on the preliminary design submitted and the available solar resource
16 for each location;
- 17 7. Manufacturing of the GSU transformer conservator tank was completed in
18 2025, enabling the project to qualify for the ITC, provided it is placed in
19 service by the end of 2029.
- 20 8. The Ringer Solar Project is located in Pike Township, which is within
21 Stoddard County, Missouri, an un-zoned county. Invenergy has obtained a
22 "Letter of No Zoning" from both Pike Township and Stoddard County
23 stating that no local permits are required for the construction of the project.

Direct Testimony
of Scott Wibbenmeyer

1 However, there are standard construction permits that the Company expects
2 to obtain prior to construction. The project permitting matrix is attached as
3 **Schedule SW-D15**. The permitting matrix attached includes the standard
4 local, state, and federal permits and approvals that the Ringer Solar Project
5 expected to receive as part of development and construction;

6 9. The Project Company has executed the necessary Road Use Agreements
7 with both Pike Township and Crowder-Zeta Special Road District; and

8 10. Invenergy has entered into advanced negotiations on of both a
9 decommissioning agreement and a Chapter 100 agreement with Stoddard
10 County. The Chapter 100 agreement, once executed, is expected to deliver
11 millions of dollars in benefits to the local community over the life of the
12 project while ensuring compliance with applicable community standards.

13 **Q. Has Ameren Missouri identified potential risks to the Ringer Solar**
14 **Project?**

15 A. Yes, all projects carry risks, and that is true for the Ringer Solar Project.
16 The identified risks for the Project are related to the generator interconnection process,
17 change in law/tariffs, and construction/procurement.

18 **Q. Has the Company put plans in place to mitigate these risks?**

19 A. Yes, The Company has maintained favorable contract terms to ensure project
20 risks are reduced or eliminated through the strategies listed below.

21 Regarding interconnection risks, the developer has already received a GIA for the
22 Ringer Solar Project; however, the current GIA effectively establishes that the Project must
23 be in-service prior to Dec 1 2027, and as a result Invenergy must obtain a waiver from

Direct Testimony
of Scott Wibbenmeyer

1 FERC to extend the commercial operation date associated with the GIA to allow for an in-
2 service date by December 31, 2029. The Company expects the waiver to be granted,
3 however, in the event that the waiver is not received by Firm Date then the Company has
4 the right to exercise its contractual remedies, including termination of the agreement.

5 As for tariff risks, the U.S. Department of Commerce has launched, and is expected to
6 continue to launch, anti-dumping circumvention investigations of solar panel modules and
7 components being imported into the United States. In addition, the federal government has
8 announced several tariffs on equipment and materials. To help manage the primary tariff
9 exposure for the project, risk is managed through the obligations and rights within the
10 BTA. *** _____

11 _____
12 _____
13 _____
14 _____
15 _____ ***

16 Regarding construction and procurement risks, *** _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____

1

2

3

Q. For which federal tax incentives does Ameren Missouri expect the project to qualify?

4

5

A. Ameren Missouri's current expectation is that the Ringer Solar Project will be eligible for either the PTC or 30% ITC, giving Ameren Missouri the choice of which credit to utilize.

6

7

8

Q. What tax strategy do you expect the Company to pursue for the project?

9

10

A. Because it is expected to provide the most value for our customers, we expect to use the 30% ITC available for the Ringer Solar Project. That expectation is based on an economic analysis comparing the relative value and risks under both the PTC and ITC scenarios, which supports use of the ITC selection option. While the Company's base financial model assumes qualification for the ITC, it will remain flexible and will ultimately pursue the approach that delivers the greatest certainty and value to Missouri customers, including by re-evaluating our current expectation to use the 30% ITC close to the time when the tax credit election must be made, which will occur closer to the anticipated in-service date of the project.

11

12

13

14

15

16

17

18

19

Q. How will the tax credits associated with the project benefit Ameren Missouri customers?

20

21

A. The tax credits associated with the Ringer Solar Project will benefit Ameren Missouri customers in the same way I outlined for the Tom Sawyer Project, ultimately translating into lower rates or avoided cost increases as compared to the economic impact

22

23

1 of the project absent the tax credits. The savings generated by these tax credits, in the same
2 way as the Tom Sawyer Solar Project, are factored into the rate-making process and are
3 assumed to be captured in the IRA tracker agreed upon by the parties to and approved by
4 the Commission in File No. ER-2022-0337, ensuring that the financial benefits flow
5 directly to Ameren Missouri customers in the form of reduced rates.

6 **Q. You indicated you expect the project to qualify for the 30% ITC. Does**
7 **that remain true given the recently-passed One Big Beautiful Bill Act?**

8 A. Yes. As with the Tom Sawyer Project, this remains true for the same reasons
9 stated previously.

10 **Q. Are there any additional bonus tax credits beyond the base 30%**
11 **ITC for which the Ringer Solar Project could qualify?**

12 A. Yes. Projects that meet certain domestic equipment supply arrangements
13 can qualify for an additional 10% ITC on top of the 30% ITC discussed earlier. For the
14 Ringer Solar Project to qualify, all structural steel used in the project (such as rebar, piles,
15 etc.) must be domestically manufactured. Additionally, the project must meet a Domestic
16 Cost Percentage Threshold, meaning that manufactured products (like solar modules,
17 inverters, transformers, etc.) used for the project must account for 45% of the total project
18 costs, based on a beginning-of-construction-year of 2025, such as that of the Ringer Solar
19 Project. Currently, not all equipment supply agreements have been issued for the project,
20 and due to the uncertainty and risks related to equipment supply, the 10% domestic content
21 bonus credit is not guaranteed. However, the BTA contemplates that Invenenergy shall use
22 commercially reasonable efforts to secure pricing proposals for each of the applicable
23 material project contracts under which the Ringer Solar Project will procure equipment to

1 be installed. The use of domestically manufactured materials can sometimes lead to pricing
2 fluctuations based on variable costs and availability, potentially impacting the eventual
3 cost that customers inherit. However, Ameren Missouri will ultimately pursue the
4 approach that delivers the greatest value to Missouri customers.

5 **VII. OTHER ISSUES**

6 **Q. Is Ameren Missouri qualified to construct and operate the Projects?**

7 A. Yes. Ameren Missouri is a well-established electric utility with extensive
8 experience in constructing and operating various types of generation projects, including
9 solar. The Company currently manages a diverse portfolio of generation facilities that
10 includes fifteen solar facilities, twelve simple cycle combustion turbine facilities, two wind
11 facilities, two coal-fired centers, three hydro-electric sites, and one nuclear power energy
12 center. With its financial, technical, and management expertise developed over many
13 years, Ameren Missouri is well-qualified to construct the Projects through both EPC and
14 BTA arrangements and eventually operate the Projects.

15 **Q. Do the Projects represent an economic development opportunity for**
16 **the State of Missouri?**

17 A. Yes, the economic impact of the BESS Projects and the Solar Projects on
18 the state and region will be significant and positive.

19 **Q. On what do you base your contention that the Projects will have a**
20 **significant and positive impact on the State of Missouri?**

21 A. The Projects will generate significant economic benefits, including the
22 creation of construction jobs during the build-out phase, permanent operations and

Direct Testimony
of Scott Wibbenmeyer

1 maintenance jobs once the Projects are in-service, and ongoing contributions to local
2 communities through property taxes or payments in lieu of taxes.

3 In addition to these direct economic benefits, indirect benefits will be realized
4 throughout project construction by restaurants, gas stations, hotels, stores and other
5 businesses in the vicinity of the Projects. And as Company witnesses Mr. Dixon and Mr.
6 Wills note, increasing the Company's portfolio of renewable energy resources will continue
7 to assist in attracting or retaining commercial and industrial customer loads, given the
8 importance of renewable energy to those customers. The benefits will be felt throughout
9 the state of Missouri.

10 **Q. Will a Chapter 100 Agreement with the respective county be used for**
11 **the Solar Projects?**

12 A. Yes, consistent with other Company generation, including its Peno Creek
13 and Audrain gas-fired generation and its Huck Finn, Bowling Green, and Vandalia solar
14 facilities, EDF has entered into a Chapter 100 financing arrangements with Audrain County
15 for the Tom Sawyer Solar Project. Invenergy is currently in the process of negotiating a
16 Chapter 100 with Stoddard County. It should be noted that for these Solar Projects, the use
17 of Chapter 100 agreements are not applied in the same way that it may be as compared to
18 others economic development incentives. In other words, the use of Chapter 100 for these
19 projects is designed to bring additional tax revenues to the local community than would
20 otherwise be the case and any additional tax savings to Ameren Missouri is directly passed
21 on to our customers. Chapter 100 arrangements allow project owners to implement
22 payment in lieu of taxes ("PILOT") arrangements instead of paying property taxes
23 otherwise called for by state law, to the benefit of customers and local counties or

Direct Testimony
of Scott Wibbenmeyer

1 municipalities. The PILOT arrangements offer a unique "win-win" scenario for Ameren
2 Missouri customers and Missouri counties, since they are designed to result in net PILOT
3 payments directly from the project owner and with greater value than the county would
4 receive otherwise under state tax law, while also reducing the overall property tax required
5 for the project. A Chapter 100 structure can create additional revenue for counties hosting
6 the project, while also bringing net property tax savings to customers. By virtue of its
7 acquisition of the respective Project Company and its merger into Ameren Missouri as
8 discussed earlier in my testimony, Ameren Missouri will become the counterparty on the
9 Chapter 100 agreements.

10 **Q. Are you requesting any variances to the application requirements as**
11 **part of your testimony?**

12 A. Yes. Ameren Missouri seeks a variance of 20 CSR 4240-20.045(5)(D) for
13 the Projects, which requires plans and specifications for the proposed asset, including as-
14 built drawings. Ameren Missouri also seeks a variance from 20 CSR 4240-20.045(3)(C),
15 for the Solar Projects and the BESS Projects, which requires items unavailable at the time
16 of filing to be submitted before a certificate is granted. Finally, Ameren Missouri requests
17 a variance from 20 CSR 4240-20.045(6)((J) for the Solar Projects and the BESS Projects,
18 which addresses the overview of plans for the restoration of safe and adequate service after
19 significant, unplanned/forced outages of an asset.

20 **Q. When will the as-built drawings for the Projects be provided?**

21 A. The Company will provide the as-built drawings within 100 days after the
22 Final Completion Date, as defined in the applicable EPC agreement for the Projects. While
23 high-level design layouts can be found in **Confidential Schedules SW-D2, SW-D4, SW-**

Direct Testimony
of Scott Wibbenmeyer

1 **D6, SW-D13 and SW-D16**, the as-built drawings can only be provided once construction
2 is completed. The as-built drawings will include site, racking, equipment, and electrical
3 plans. This approach is consistent with the Commission's recent CCN approvals in File
4 Nos. EA-2023-0286, EA-2024-0237, EA-2025-0238, and EA-2025-0239.

5 **Q. Is Ameren Missouri seeking a variance to submit plans for the**
6 **restoration of safe and adequate service for the Projects?**

7 A. Consistent with the Commission's Orders in File No. EA-2025-0238, the
8 Company requests to provide the Projects draft plans for restoration of safe and adequate
9 service 90 days prior to the date that each individual project will be placed in-service and
10 within 60 days' post commercial operation of the individual projects. Plans for restoration
11 of safe and adequate service will not be complete until final equipment selection,
12 installation, and discussions between Ameren Missouri operations personnel and the
13 Projects' contractors and equipment suppliers take place.

14 **Q. What are the proposed in-service criteria for the Projects?**

15 A. For the BESS Projects, the Company recommends using in-service criteria
16 substantially similar to those approved by the Commission in File No. EA-2025-0238. The
17 proposed in-service criteria are attached to my Direct Testimony as **Schedule SW-D8** and
18 are substantially similar to the previously approved criteria, with updates to reflect the
19 capacity and testing specifications applicable to the BESS Projects designs. Likewise, for
20 the Solar Projects, the Company recommends using the in-service criteria historically used
21 and approved by the Commission in File Nos. EA-2023-0286 and EA-2025-0239. I have
22 attached the Solar in-service criteria to my Direct Testimony as **Schedule SW-D12**.

