

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

|                                                       |   |                       |
|-------------------------------------------------------|---|-----------------------|
| In the Matter of the Application of Union Electric    | ) |                       |
| Company, d/b/a Ameren Missouri, for Permission        | ) |                       |
| and Approval and Certificates of Public Convenience   | ) | File No. EA-2026-0226 |
| and Necessity for a Natural Gas Electrical Generation | ) |                       |
| Facility.                                             | ) |                       |

**APPLICATION**

**COMES NOW** Union Electric Company, d/b/a Ameren Missouri (“Company,” “Ameren Missouri,” or “Applicant”), pursuant to Sections 393.170.1, RSMo.<sup>1</sup> and 393.135.2, RSMo. (Cum. Supp. 2026), and 20 CSR 4240-2.060, and 20 CSR 4240-20.045, and hereby submits to the Missouri Public Service Commission (“Commission”) its *Application*, requesting the following:

- A Certificate of Convenience and Necessity (“CCN”) under subsection 1 of Section 393.170, RSMo., authorizing Ameren Missouri to construct an approximately 2,100 megawatt (“MW”) combined cycle, natural gas-fired electric generation plant to be located at the site of the Company's existing Sioux Energy Center in West Alton, Missouri, which is in St. Charles County (“West Alton Project” or “Project”);
- A determination under Section 393.135.2(1), of the amount of Construction Work in Progress (“CWIP”) that may be included in the Company's rate base for the Project;
- A determination that the Project satisfies the reliable replacement electric generation provisions of Section 393.401, RSMo., arising from the retirement of the Sioux Energy Center;
- A variance from the requirement in 20 CSR 4240-20.045(6)(J) so that the Company can, within ninety (90) days prior to the date that each Project will be placed in-service, provide

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<sup>1</sup> All statutory references are to the Revised Statutes of Missouri (2016), unless otherwise stated. The last published RSMO is 2016 – everything since then is a cumulative supplement, e.g., (Cum. Supp. 2026).

an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages, and submit its final plans no later than sixty (60) days after each Project is placed in-service, consistent with the condition relating to this requirement adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239;

- Establishment of a prehearing conference immediately upon the expiration of the deadline for applications to intervene to establish a procedural schedule to facilitate the issuance of a Commission order granting the relief requested in this *Application* by April 2027, so that the Project can be timely constructed and placed in-service; and
- For such other and further relief as may be appropriate under the circumstances.

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

| <b>Witness</b>                                                                                | <b>Subject Matter</b>                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ajay Arora<br>Executive Vice President and Chief Growth<br>and Generation Development Officer | Provides a filing overview, including how the Project will support the Company's service obligation to all of its customers.                                                       |
| Christopher Stumpf<br>Vice President, Engineering Design                                      | Provides an overall description of the Project, including estimated cost, construction schedule, contract structure, and operational capability.                                   |
| Steven M. Wills<br>Senior Director, Regulatory Affairs                                        | Addresses how the Project meets the <i>Tartan</i> factors, commitments from prior dockets for CCN cases, and the Company's request for a determination of costs eligible for CWIP. |
| Mitchell Lansford<br>Vice President and Treasurer                                             | Addresses the Company's ability to finance the Project                                                                                                                             |
| Matt Michels<br>Director, Corporate Analysis                                                  | Outlines the drivers of the need for the Project and Project economics.                                                                                                            |
| Andrew M. Meyer                                                                               | Discusses the Project's accreditation, its mitigation against overreliance on the market, how the Project satisfies "watt-for-watt"                                                |

| Witness                                        | Subject Matter                                                          |
|------------------------------------------------|-------------------------------------------------------------------------|
| Senior Director, Energy Management and Trading | requirements, and the Company's firm fuel supply plans for the Project. |

In support of these requests, Applicant states as follows:

## I. APPLICANT

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. The Applicant is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. A certified copy of Applicant's Articles of Incorporation, which are incorporated herein by reference, is already on file with the Commission. (See Case No. EA-87-105.) The Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office is attached hereto as *Application Schedule A*. A Certificate of Corporate Good Standing for Applicant is attached as *Application Schedule B*.

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

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

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

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

5. A 60-day notice with respect to the authority sought herein was filed on March 6, 2026, and assigned the above-captioned file number.

## **II. REQUEST FOR CCN FOR THE WEST ALTON PROJECT UNDER SECTION 393.170.1**

6. Applicant requests a CCN for the West Alton Project.

### **A. Project Description**

7. As discussed in greater detail in Company witness Stumpf's Direct Testimony, the Project is an approximately 2,100 MW multi-unit combined cycle natural gas-fired electric generation facility to be located at the site of the Company's existing Sioux Energy Center in West Alton, Missouri, which is in St. Charles County. It will consist of three, advanced-class Mitsubishi natural gas-fired combined cycle ("NGCC") units. Each unit will be capable of generating approximately 700 MW and consist of a 1x1, single-shaft advanced-class turbine, an electrical generator, a steam turbine, heat recovery steam generator ("HRSG") equipment, and a wet-cooled forced draft cooling tower. The units will be intended for higher efficiency baseload operations to ensure they are available to operate at a capacity factor of 85% or more.

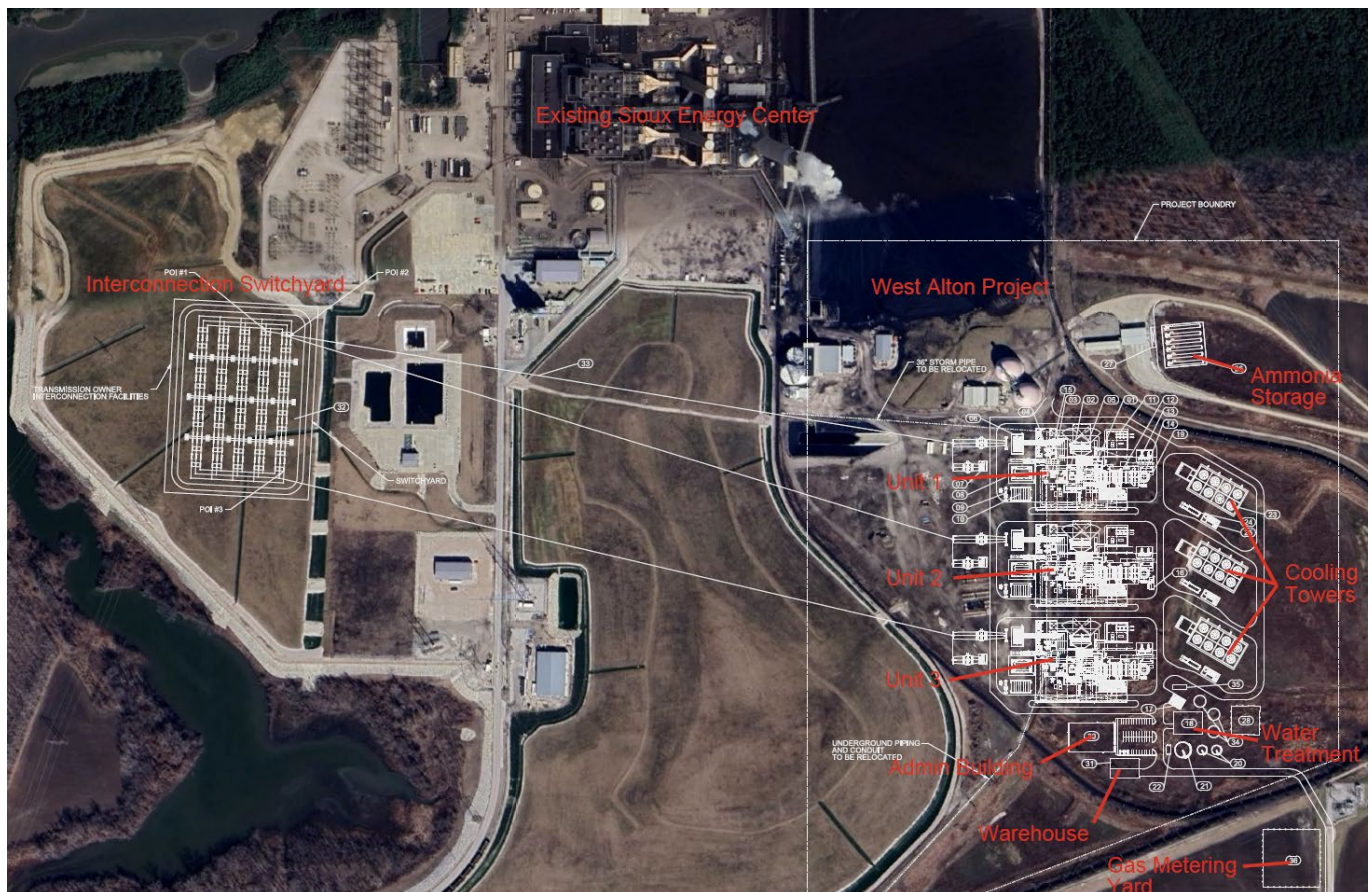
The property on which the facility will be built is part of the land presently owned by Ameren Missouri adjacent to the Sioux Energy Center.<sup>2</sup> The Project will be interconnected to the

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<sup>2</sup> Sioux's operations will be unaffected by the Project.

345-kV transmission system located in the area of the site via a new 345-kV switchyard to be constructed adjacent to the current Sioux Energy Center switchyard.<sup>3</sup> See Figure 1, below:

***Figure 1, West Alton Project Site Arrangement***



The site also benefits from ready access to a reliable fuel supply provided by \*\* \_\_\_\_\_

\_\_\_\_\_ \*\* transmission gas supply pipeline that runs within approximately two miles of the site.

<sup>3</sup> The Project will take advantage of significant 345 kV regional transmission system upgrades in northeast Missouri, approved by the Midcontinent Independent System Operator ("MISO") as part of its Long-Range Transmission Plan Tranche 2.1, to be completed by Ameren Transmission Company of Illinois.

8. As Mr. Stumpf's Direct Testimony discusses in detail, in developing the Project, Ameren Missouri will utilize what is referred to as an Engineer, Procure, Construction Management ("EPCM") approach, which will allow the Company to implement the Project in a cost-effective manner that timely meets the Company's generation needs. The EPCM approach will consist of three primary parties: (1) the Company, which will have certain project-management responsibilities and also make direct purchases of major equipment through a request for proposal ("RFP") and competitive-bid process; (2) Sergeant and Lundy, the engineer of record, which will provide engineering, procurement, and commissioning services; and (3) a construction contractor, which will be a joint venture between McCarthy Building Companies, Inc. ("McCarthy") and Alberici Constructors ("Alberici") called McCarthy Alberici Constructors. McCarthy and Alberici are experienced, St. Louis-based utility-scale contractors who have successfully completed several prior Ameren Missouri (and affiliate) projects and have deep relationships with labor groups for a project of this type, which will be important to the Project's successful implementation.

9. On-site construction is anticipated to commence in June 2027, and the last unit is anticipated to be completed and placed in-service by the fourth quarter of 2031.<sup>4</sup>

**B. The West Alton Project is Necessary or Convenient  
for the Public Service ("Tartan Factors")**

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

- a. Need for the Project;
- b. Economic Feasibility of the Project;
- c. Ability of the Applicant to Finance the Project;

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<sup>4</sup> It is expected that the three units will be placed in service in the second, third, and fourth quarters, respectively, of 2031.

- d. Qualifications of the Applicant to Construct the Project; and
- e. Whether the Project is in the Public Interest.<sup>5</sup>

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.<sup>6</sup>

**1. There is a need for the Project.**

11. The West Alton Project is needed for several reasons. First, as outlined in the Company's 2025 Preferred Resource Plan and as discussed by Company witnesses Michels' and Arora's Direct Testimony, the Company needs additional capacity and baseload energy to discharge its obligation to serve all its customers, including load from new large load customers who have signed Electric Service Agreements ("ESAs") reflecting 2.8 gigawatts of load.<sup>7</sup>

12. As Company witness Meyer's Direct Testimony discusses, the Project also supports the Company's compliance with reliable replacement electric generation requirements under the "watt-for-watt" statute contained in Senate Bill No. 4 (specifically, Section 393.401, RSMo. (Cum. Supp. 2026)). In addition, the Project will provide baseload energy that will no longer be available when the aged Sioux Energy Center retires. The robust baseload energy the Project will generate also reduces exposure to volatile energy market prices, especially in times of peak demand. Adding the Project to the Company's generation portfolio provides flexibility to meet its customers' ongoing needs in the event that it becomes necessary to retire other generation resources, such as the Company's Labadie Energy Center, sooner than is currently planned.

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

<sup>6</sup> *Id.* at 189 (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. at 561).

<sup>7</sup> The ESAs reflecting this load were signed between February and May of this year. As noted by Company witness Wills' Direct Testimony, the Commission will decide how Project costs are allocated for ratemaking purposes in future Company ratemaking proceedings – no such determinations will be made in this CCN case.

Other benefits of the Project include that it contributes to meeting the Local Clearing Requirement in Zone 5 (Missouri), and it will contribute to relieving customer exposure to some of the tightness seen in the capacity situation in MISO, especially in recent years (see Company witness Meyer's Direct Testimony).

13. In sum, the proposed Project is an improvement that justifies its costs.

**2. The Project is economically feasible.**

14. For several reasons, the Project is economically feasible, based on various indicia of economic feasibility identified by the Commission in prior generation CCN cases, as discussed in greater detail in Company witness Wills' Direct Testimony, including as the Commission has recognized, since the Project is needed, economic feasibility generally turns on the Company's ability to finance the Project, among other reasons.

**3. Ameren Missouri is able to finance the Project.**

15. As explained in the Direct Testimony of Company witness Lansford, Ameren Missouri has the financial capability to generate and raise the capital needed to develop the Project. Specifically, the Company has sufficient access to capital markets based on, among other things, its stable credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies, respectively, which will allow it to access the market as needed over the Project's multi-year development timeline. The Company also has access to a substantial short-term credit facility to provide ongoing funds as the Project proceeds. Thus, Ameren Missouri is able to finance the Project.

**4. Ameren Missouri is qualified to construct the Project.**

16. As explained in the Direct Testimony of Company witness Stumpf, Ameren Missouri is qualified to construct and operate the Project, given the financial, technical, and



management expertise Ameren Missouri has developed over the course of its long history as a large public utility operating in the state of Missouri. More specifically, through existing steam turbine operations at baseload fossil-fuel and nuclear energy centers, an existing fleet of 12 combustion turbine sites, and development of the Castle Bluff and Big Hollow Energy Centers, the Company has expertise in:

- multiple turbine technologies and configurations;
- heat rate optimization and performance monitoring;
- flexible operations, including cycling and load-following capability; and
- integration with interstate natural gas pipeline infrastructure.

#### **5. The Project is in the public interest.**

17. As discussed in Company witness Wills' Direct Testimony, implementation of the Project promotes the public interest because in addition to the fact that it meets the first four *Tartan* factors, the Project promotes the public interest for other reasons, including because it allows the Company to effectively balance reliability, affordability, and sustainability, three priorities that should be considered the pillars of the generation transition that the Company is undertaking and that is also happening broadly across the industry.

#### **C. Other Filing Requirements**

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

a. the Project site, located at the existing Sioux Energy Center site in St. Charles County, Missouri, is depicted in and described in detail in **Figure 1 above** (20 CSR 4240-20.045(6)(A));

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

- c. in accordance with 20 CSR 4240-20.045(6)(C),
  - (i) the scope of the construction Project is described in Company witness Stumpf's Direct Testimony;
  - (ii) A description of the plans and specifications are found in Schedule CS-D1 to Company witness Stumpf's Direct Testimony;
  - (iii) the Project's base cost estimate is approximately \*\*\* \_\_\_\_\_ \*\*\* and its risk-adjusted cost estimate is approximately \*\*\* \_\_\_\_\_ \*\*\*,<sup>8</sup>
  - (iv) the operational features of the asset once it is fully operational and used for service are discussed by Company witness Stumpf in his Direct Testimony;
- d. construction is expected to begin June 1, 2027 after the required permits are received, and the three units are expected to be placed in-service in the second, third, and fourth quarters of 2031, respectively (20 CSR 4240-20.045(6)(D));
- e. there is no common plant (20 CSR 4240-20.045(6)(E));
- f. Ameren Missouri's plans for financing the Project are discussed in the Direct Testimony of Company witness Lansford (20 CSR 4240-20.045(6)(F));
- g. the Project is contemplated by the Company's Preferred Resource Plan as explained in the Direct Testimony of Company witness Michels (20 CSR 4240-20.045(6)(G));
- h. as explained in the Direct Testimony of Company witness Stumpf,
  - (i) the Project's major equipment (engines, HRSG, and transformers) were procured via RFP processes and competitive bidding; and

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<sup>8</sup> These are "overnight cost" estimates and exclude AFUDC.

(ii) the detailed design, on-site construction, and remainder of the balance of plant equipment will be covered by a negotiated, target-price contract arrangement using the EPCM approach discussed earlier and in greater detail in Mr. Stumpf's Direct Testimony (20 CSR 4240-20.045(6)(H)).

i. as described in the Direct Testimony of Company witness Stumpf, the Company will operate and maintain the Project in a similar manner as the Company's other plants (20 CSR 4240-20.045(6)(I));

j. Ameren Missouri requests a variance from the requirement in 20 CSR 4240-20.045(6)(J) so that the Company can, within ninety (90) days prior to the date that each Project will be placed in-service, provide an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages, and submit its final plans no later than sixty (60) days after each Project is placed in-service, consistent with the condition relating to this requirement adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239; and

k. the Company is not required to provide notice under 20 CSR 4240-20.045(6)(K) because the Project does not include construction of new transmission lines or transmission substations outside of Company-owned property.

19. As addressed in detail by Mr. Wills' Direct Testimony, the Company's direct filing satisfies various future CCN application commitments reflected in Stipulations and Agreements in File Nos. EA-2023-0286, EA-2025-0238, and EA-2025-0239.

### III. REQUEST FOR CWIP AMOUNT DETERMINATION UNDER SECTION 393.135.1

20. Ameren Missouri requests a determination under Section 393.135.1, RSMo., of the amount of CWIP that may be included in rate base for the West Alton Project.

21. Section 393.135.2(1), RSMo., states in pertinent part (*emphasis added*):

*An electrical corporation may be permitted, subject to the limitations in this subsection, to include construction work in progress for any new natural gas-generating unit in rate base. The inclusion of construction work in progress allowed under this subsection shall be in lieu of any otherwise applicable allowance for funds used during construction that would have accrued from and after the effective date of new base rates that reflect inclusion of the construction work in progress in rate base. The commission shall determine, in a proceeding under section 393.170, the amount of construction work in progress that may be included in rate base. The amount shall be limited by:*

*(a) The estimated cost of such project; and*

*(b) Project expenditures made within the estimated construction period for such project.*

22. Ameren Missouri is an "electrical corporation" as that term is used in Section 393.135.2, RSMo.

23. The West Alton Project is a new natural gas generating unit for which a CCN is also being requested in this *Application*.

24. The Commission "shall determine" in a CCN proceeding like this one under Section 393.170, the amount of CWIP that may be included in the Company's rate base in future general rate case(s).

25. As explained by Company witnesses Stumpf the overall risk-adjusted estimated cost of the Project is approximately \*\*\* \_\_\_\_\_ \*\*\*.

26. Construction is estimated to be complete by the end of 2031.

27. Therefore, Ameren Missouri requests that the Commission establish the above-referenced risk-adjusted cost estimate, subject to potential revision during the pendency of this docket, as the amount of CWIP that may be eligible for inclusion in rate base in future general rate cases.<sup>9</sup>

#### **IV. PRAYERS FOR RELIEF**

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

- Granting a CCN under subsection 1 of Section 393.170, RSMo., authorizing Ameren Missouri to construct the West Alton Project;
- Establishing, under Section 393.135.2(1), RSMo., that \*\*\* \_\_\_\_\_ \*\*\* is the amount of CWIP that may be included in the Company's rate base for the Project in future rate cases (as such sum may be revised during the pendency of this case);
- Determining that the Project satisfies the reliable replacement electric generation provisions of Section 393.401 arising from the retirement of the Sioux Energy Center;
- Granting a variance from the requirement in 20 CSR 4240-20.045(6)(J) so that the Company can, within ninety (90) days prior to the date that each Project will be placed in-service, provide an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages, and submit its final plans no later than sixty (60) days after each Project is placed in-service;
- Establishment of a prehearing conference immediately upon the expiration of the deadline for applications to intervene to establish a procedural schedule to facilitate the issuance of

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<sup>9</sup> As addressed by Mr. Wills in his Direct Testimony, the utilization of CWIP is expected to save customers money as compared to the alternative approach of accruing Project costs and waiting to pay them off when the Project is completed, which is akin to building up a large credit card balance and financing it over an extended period of time instead of paying it off as one goes

a Commission order granting the relief requested in this *Application* by May, 2027, so that the Project can be timely constructed and placed in-service; and

- For such other and further relief as may be appropriate.

Respectfully submitted,

/s/ **James B. Lowery**

**James B. Lowery**, Mo. Bar #40503

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Columbia, MO 65201

Telephone: (573) 476-0050

E-mail: lowery@jblawllc.com

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Telephone: (314) 861-1705

Facsimile: (314) 554-4014

E-Mail: AmerenMOService@ameren.com

**Edward T. Pivin, #64086**

Lewis Rice

600 Washington Avenue

Suite 2500

St. Louis, MO 63101

(314) 444-7851

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

### **VERIFICATION**

The undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Application* is true and correct to the best of his knowledge, information, and belief.

This request is substantially consistent with the preferred resource plan required by 20 CSR 4240-Chapter 22.

/s/ Ajay K. Arora  
Ajay K. Arora,  
Exec. VP and Chief Growth and Generation  
Development Officer  
Union Electric Company  
d/b/a Ameren Missouri

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 24<sup>th</sup> day of July, 2026.

*/s/ James B. Lowery*  
James B. Lowery



## Schedule A



## State of Missouri

Denny Hoskins, Secretary of State

Corporations Division

PO Box 778 / 600 W. Main St., Rm. 322

Jefferson City, MO 65102

X001858426

Date Filed: 11/5/2025

Expiration Date: 11/5/2030

Denny Hoskins

Missouri Secretary of State

## Registration of Fictitious Name

(Submit with filing fee of \$7.00)

(Must be typed or printed)

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

Please check one box:

☒ New Registration ☐ Renewal ☐ Amendment ☐ Correction  
 Charter number Charter number Charter number

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

Business name to be registered: AMEREN MISSOURI

Business Address: 1901 Chouteau Ave

(PO Box may only be used in addition to a physical street address)

City, State and Zip Code: Saint Louis, MO 63103-3003

## Owner Information:

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

| Name of Owners,<br>Individual or Business<br>Entity | Charter #<br>Required If<br>Business<br>Entity | Street and Number        | City and State  | Zip Code        | If Listed, Percentage<br>of Ownership Must<br>Equal 100% |
|-----------------------------------------------------|------------------------------------------------|--------------------------|-----------------|-----------------|----------------------------------------------------------|
| UNION ELECTRIC<br>COMPANY                           | 00040441                                       | 5661 Telegraph Rd Ste 4B | Saint Louis, MO | 63129 -<br>4275 | 100.00                                                   |

All owners must affirm by signing below

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060 RSMo)

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

Name and address to return filed document:

Name: Julie Irby

Address: Email: jirby@ameren.com

City, State, and Zip Code:

# STATE OF MISSOURI



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

**CORPORATION DIVISION**  
**CERTIFICATE OF GOOD STANDING**

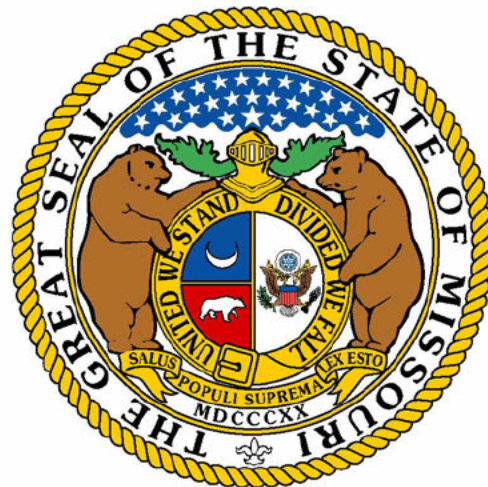
I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

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

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

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

*Denny Hoskins*  
Secretary of State



Certification Number: CERT-05192026-0123