Exhibit No.:	
Issue(s):	Tartan Factors, Stipulation Commitments, CWIP
Witness:	Steven M. Wills
Type of Exhibit:	Direct Testimony
Sponsoring Party:	Union Electric Company
File No.:	EA-2026-0226
Date Testimony Prepared:	July 24, 2026

MISSOURI PUBLIC SERVICE COMMISSION

File No. EA-2026-0226

DIRECT TESTIMONY

OF

STEVEN M. WILLS

ON

BEHALF OF

UNION ELECTRIC COMPANY,

d/b/a Ameren Missouri

St. Louis, Missouri
July 24 2026

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DIRECT TESTIMONY

OF

STEVEN M. WILLS

FILE NO. EA-2026-0226

I. INTRODUCTION

Q. Please state your name and business address.

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

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

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

Q. Please describe your professional background and qualifications.

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

In June 2004, I joined Ameren Services as a Forecasting Specialist. In this role, I developed forecasting models and systems that supported the Ameren operating companies' involvement in the Midwest Independent Transmission System Operator, Inc.'s ("MISO")[1] Day 2 Energy Markets. In November 2005, I moved into the Corporate Analysis Department of Ameren Services, where I was responsible for performing load research activities, electric and gas sales forecasts, and assisting with weather normalization for rate cases. In January 2007, I accepted a role I briefly held with Ameren Energy Marketing Company as an Asset and Trading Optimization Specialist before returning to Ameren Services as a Senior Commercial Transactions Analyst in July 2007. I was subsequently promoted to the position of Manager, Quantitative Analytics, where I was responsible for overseeing load research, forecasting and weather normalization activities, as well as developing prices for structured wholesale transactions.

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

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe generally the Company's application for a Certificate of Convenience and Necessity ("CCN") for the West Alton Energy Center ("West Alton" or "Project") located in St. Charles County, Missouri. The Project represents a major addition of both capacity and baseload energy to the Company's system in the form of a 3-unit,

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

2,100 Megawatt ("MW") natural gas combined cycle generating plant, which will serve as a cornerstone of the Company's system for decades to come.

The Project is planned to be constructed and placed into service as a part of the Company's portfolio of generating resources starting in Q2 2031 with all three units expected to be in service by Q4, 2031. I will address the *Tartan* Factors the Missouri Public Service ("Commission") typically uses in the evaluation of CCNs and explain why granting the CCN is in the public interest. Next, I will outline the Company's request for determinations related to Construction Work in Progress ("CWIP"). Finally, I will address certain items required by certain Stipulation and Agreements entered into by the Company and certain other parties and approved by the Commission in resolution of various previous CCN cases.

Q. Why is Ameren Missouri proposing construction of the Project?

A. As discussed in the Direct Testimonies of Company witnesses Matt Michels, Andrew Meyer, and Ajay Arora, the Project is needed to provide the capacity and baseload energy required to meet our customers' total capacity and energy needs, which includes an appropriate and diverse mix of resources including both dispatchable and renewable generation needed to achieve the fundamental objective of resource planning – "to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies."[2] The need to meet our customers' energy needs given upcoming energy center retirements and load growth, including from large load customers that have executed Electric Service Agreements ("ESAs"), is making the Company's prospective need for capacity and energy resources increasingly acute and urgent. The West Alton facility will be a major piece

[2] 20 CSR 4240-22.010(2).

of the solution to meeting the increasing demand on the system and maintaining reliable service for all of our customers. On February 13, 2025, the Company filed a Notice of Change in Preferred Resource Plan ("PRP") associated with its Integrated Resource Plan ("IRP"), which identified a need for the acceleration of certain generation, otherwise planned to be developed later in the planning horizon, due to changes in load expectations arising from the high level of interest the Company was receiving from large load customers, as well as a reduction in the level of energy efficiency program savings expected as an outcome of the Company's most recent application for approval of energy efficiency programs under the Missouri Energy Efficiency Investment Act. Since that change in PRP, the Company has announced that it has entered into ESAs to serve 2.8 Gigawatts ("GW") of large load demand. The impact of this new expected demand on the Company's retail load forecast results in the need for additional capacity to maintain resource adequacy, as well as energy resources, in the same general timeframe as the Project is contemplated to come online. See the Direct Testimony of Mr. Michels for more details.

III. THE PROJECT IS NECESSARY OR CONVENIENT FOR THE PUBLIC SERVICE

Q. What do you understand to be the requirements to obtain a CCN for generating plants like the West Alton Project?

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

> In explaining the nature of its analysis [of CCN requests], the Commission stated the following:
>
> **Necessary or Convenient for the Public Service**

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

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

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

Applying this standard, the Commission concluded that the peaking plants at South Harper would "promote the public interest."[5]

As the Commission recognized, in a CCN case like this one the primary question is whether the Project is in the public interest.

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

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

Q. What are the *Tartan* Factors?

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[3] File No. EA-2006-0309, *Staff's Post-Hearing Brief*, p. 6 (case citations omitted), filed May 12, 2006.
[4] File No. EA-2006-0309, *Report and Order*, p. 23, filed May 23, 2006.
[5] *Id*., p. 56.

A. The *Tartan* Factors were adopted by the Commission as guidelines for evaluation of CCN applications in its decision in *In Re Tartan Energy Co., L.C.*, No. GA-94-127, 1994 WL 762882 (Sept. 16, 1994). The factors are as follows:

1. Is there a need for the resource?
2. Is the applicant qualified to operate the proposed resource?
3. Does the applicant have the financial ability to develop or acquire the resource?
4. Is the resource economically feasible; and
5. Does granting the CCN for the resource promote the public interest?

I will discuss these factors and how consideration of each of them supports the conclusion that the Project is in the public interest, thereby supporting the Company's request that the Commission grant the CCN.

***Tartan* Factor 1: The Project is Needed**

Q. How does the Commission define necessity for purposes of CCN applications such as this case?

A. First, as a threshold matter, it is instructive to consider what the Commission had to say about this factor in the *Tartan* case itself. In *Tartan*, the Commission made clear that “[t]he term ‘necessity’ does not mean ‘essential’ or ‘absolutely indispensable,’ but that an additional service would be "an improvement justifying its cost." *Tartan* involved a request for an area certificate covering new natural gas service to several communities in southern Missouri, for which new gas distribution infrastructure would need to be built to provide the service. The communities in question were relying on propane or other sources of fuel at the time, and the Commission engaged in a fairly robust discussion of factors that support issuance of a CCN. The Commission determined that need was satisfied in the case and considered the following factors: the communities' "preference" for natural gas, the positive economic development impacts that granting the CCN would promote, and the potential for lower energy costs for consumers. By doing so, it did not anchor itself to one criterion in deciding whether a need existed but considered the totality of the evidence based on a broad view of the benefits of the project.

Q. Please elaborate further on why the Project satisfies the *Tartan* Factor of need.

A. As I noted earlier, the need for the Project arises from upcoming energy center retirements[6] and 2.8 GW of new load reflected in ESAs signed earlier this year with large load customers.

Mr. Michels' Direct Testimony details the need for the Company to add capacity to ensure reliability and meet the Company's resource adequacy requirements for all of its customers. The Company also needs to fill out its portfolio with resources that can provide significant quantities of baseload energy to meet rising energy demand and prepare for the retirement of other resources – such as the Sioux Energy Center ("Sioux") – that have been cornerstones of the Company's system for decades. The West Alton Project addresses both of these critical needs at a scale that, as a practical matter, is virtually impossible to timely replicate with other resource types. In addition, the Company is legally required by the "watt-for-watt" statute adopted in 2025 as part of the enactment of Senate Bill No. 4 ("SB 4") to implement dispatchable resources that equal or exceed the capacity of dispatchable resources that are being retired before that capacity is required. West Alton will meet that requirement respecting the retirement of Sioux, which is expected to

[6] As discussed in Mr. Michels' Direct Testimony, the Venice Energy Center is slated to retire in 2030 due to the requirements of the Illinois Clean Energy and Jobs Act and the Sioux Energy Center, which is nearly 70 years old, will retire in the near-term after West Alton goes into service.

occur concurrently with or in the near-term after West Alton goes into service. The Project is unquestionably a needed improvement justifying its costs.

Tartan Factor 2: The Company is Qualified to Operate the Project.

Q. How does the Company satisfy _Tartan_ Factor 2?

A. The Company has safely and reliably operated thousands of MW of generation, including generation associated with a wide variety of fuel sources and technologies, for decades, including a fleet of 12 gas combustion turbine sites. The Company's operational capabilities are further discussed in the Direct Testimony of Company witness Chris Stumpf, but I think it is self-evident that the Company is clearly qualified to operate the Project.

Tartan Factor 3: The Company has the Financial Ability to Develop the Project

Q. Please address Ameren Missouri's financial ability to develop the Project.

A. As discussed further in the Direct Testimony of Company witness Mitchell Lansford, Ameren Missouri has the financial capability to generate and raise the capital needed to develop the Project. The upfront base case capital cost of the Project is estimated to be approximately ***__________***, with a risk-adjusted capital cost estimate of approximately ***__________***. As Mr. Lansford's Direct Testimony indicates, Ameren Missouri has strong, investment grade credit ratings that will allow it to access the capital markets over the roughly five-plus year Project development and construction timeline, as well as access to a significant credit facility which together give it the ability to finance the Project.

Tartan Factor 4: The Project is Economically Feasible.

Q. Please address the economic feasibility of the Project.

A. The Project represents an improvement justifying its cost. This is because the Project is a needed resource to reliably and cost effectively meet customers' capacity and energy

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needs, including the growing needs of expected large load customers, and to mitigate certain risks. The Commission has recognized that when a project is needed, the economic feasibility question largely turns on whether the utility can finance the project, which, as discussed earlier, is clearly met for the Project. The economic feasibility of the Project is also supported by other facts.

Consistent with items that the Commission has relied on in past CCN cases in its analysis of economic feasibility, this Missouri-based Project will create jobs[7] and tax revenues within the state and within the Company's service territory and will lessen the Company's reliance on the MISO energy and capacity market. Moreover, the Project's contracting for major equipment is the product of competitive bidding and contracting for construction activities relies on a capable and experienced Engineer, Procure, and Construction Management ("EPCM") structure that provides strong cost control and transparency with pricing benchmarked and validated using independent estimates and market data as further discussed by Mr. Stumpf. Additionally, as also discussed in Mr. Stumpf's Direct Testimony, the Project's location creates advantages relating to transmission interconnection due to regional projects already approved by MISO that may eliminate or substantially mitigate network upgrade costs one could expect at other locations.

***Tartan* Factor 5: The Project is in the Public Interest.**

Q. Finally, turning to the last *Tartan* factor, does granting the CCN for the West Alton Project promote the public interest?

A. Yes. It is often said that the public interest test is generally satisfied if each of the first four *Tartan* factors are satisfied. Given that each of the first four *Tartan* Factors strongly support the issuance of the CCN, as discussed above, it is a logical extension to conclude that the Project is in the public interest. But just to put a finer point on the public interest question, I will

[7] As Mr. Stumpf's Direct Testimony discusses, the construction contract for the Project will be with a joint venture comprised of two of the state's largest industrial construction firms, both headquartered in St. Louis.

reiterate the perspective that I first shared in the Boomtown case (File No. EA-2022- 0245) on the public interest here.

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

As essentially the only practical solution to timely meeting the acute need for large quantities of baseload energy and capacity due to expected energy center retirements and load growth, the Project is foundational to the pillar of reliability.

IV. REQUEST FOR CWIP DETERMINATIONS

Q. Does the Company anticipate including CWIP associated with the project in the rate base used to establish future electric rates during cases when the project is under construction?

A. That is our current expectation. Accordingly, the Company is requesting that the Commission establish the required parameters for the Project that would enable the use of CWIP for West Alton consistent with the requirements and protections contained in SB 4, which enables the utilization of CWIP for new gas generation. Specifically, RS MO 393.135.2, provides that:

> 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.

This docket is the 393.170 proceeding in which the Commission must establish the cost and construction period parameters that will govern the potential future consideration of CWIP for West Alton. Consequently, the Company requests that the Commission find that, subject to review in a future rate proceeding of any request the Company may make for inclusion of CWIP balances associated with the Project in rate base, that amounts up to ***__________ ***, the risk adjusted cost estimate presented by Mr. Stumpf, incurred through a construction period up to an including December, 2031 be eligible for the rate base treatment as provided for in SB 4. I should note that 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.

V. STIPULATION AND AGREEMENT COMPLIANCE

Q. In the Company's recent CCN cases for generation facilities (Files No. EA-2023-0286, EA-2025-0238, and EA-2025-0239) in which it received CCNs for various generation facilities, the Company committed in Stipulations and Agreements ("Stipulations") to provide certain information supporting certain future CCN applications. What information is required under these Stipulation provisions and how does the Company's filing satisfy those requirements?

A. The first Stipulation related to multiple solar energy centers, filed with the Commission on March 5, 2024 in File No,. EA-2023-0286, and approved by the Commission on March 21, 2024, required the Company to provide several categories of information, including:

1. Provide to Staff prior to the filing of a future CCN application analysis of three alternative resource plans of Staff's choosing based on the Company's 2023 IRP,
2. Analysis of its PRP using project specific assumptions replacing generic resource assumptions used in its IRP,
3. Analysis of a "do nothing" plan that assumes the requested CCN is not granted and the Company does not pursue the project that is the subject of the application,
4. Testimony regarding the needs being addressed by the resource for which the CCN is being sought,
5. Testimony regarding any regulatory treatments implicated by the filing, and
6. Answers to ten specific questions that Staff identified in File No. EA-2023-0286 as being relevant to the approval of a CCN application.

Q. Has the Company provided all the information required under the first Stipulation in support of its CCN application for the Project in this case?

A. Yes. The Company provided the analysis required in Item 1 above in advance of its Castle Bluff CCN filing in File No. EA-2024-0237 on June 6, 2024, to Staff members Busch, Luebbert, Fortson, and Graham. Consequently, that item is fully satisfied. The analyses required in Items 2 and 3 above are addressed in the Direct Testimony of Mr. Michels at pages 28-29. In response to Item 4, I have described the need for the resource at a high level in my testimony above, but the detailed description required by the first Stipulation is addressed in the Direct Testimonies of witnesses Messrs. Arora, Michels, and Meyer. For Item 5, Plant in Service Accounting will apply to the Projects and we are requesting the determinations required by Section 393.135.2 relating to qualifying the project for utilizing construction work in progress in future rate reviews, and determinations related to the "watt-for-watt" replacement generation requirements as described by Mr. Meyer. I would also clarify at this time that the cost allocation of the resource does not need to be determined at this time, as it will be appropriately considered and decided upon by the Commission in a future rate case where all parties can argue for the allocation that they believe to be appropriate. I will address the ten questions identified by Staff in Item 6 of the list above in the remainder of this section of my testimony.

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

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

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

A. The Company is requesting that the Commission grant it a CCN under its authority pursuant to subsection 1 of § 393.170, RSMo., to construct, own, and operate the West Alton Combined Cycle Energy Center in St. Charles County, Missouri, and requests that the Commission grant the CCN by May 2027. The Company is also requesting certain variances from Commission rules as set out in the Application: 20 CSR 4240-20.045(5)(D) and 20 CSR 4240-20.045(3)(C) so that as-built drawings can be supplied after exercise of authority under the CCN consistent with the condition related to as-built drawings adopted by the Commission in File Nos. EA-2023-0286 and EA-2025-0239; and 20 CSR 4240-20.045(6)(J) so that the Company's plans for restoration of safe and adequate service can be provided closer to the time when the Project will commence commercial operations also consistent with the condition relating to this requirement adopted by the Commission in Files No. EA-2022-0244, EA-2022-0245, EA-2023-0286, and EA-2025-0238.

Finally, the Company is requesting the CWIP- and "watt-for-watt"-related determinations I discussed earlier.

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

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

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

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

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

A. Yes. See my discussion above and the Direct Testimony of Mr. Lansford.

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

A. Yes. See my discussion above and the Direct Testimony of Mr. Stumpf.

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

A. The answers to these questions are "yes," as discussed in my testimony above respecting *Tartan* Factors 1, 4, and 5, and for the reasons discussed by Messrs. Arora, Meyer, and Michels in their Direct Testimonies.

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

A. The answers to these questions are "yes," as discussed in my testimony above respecting *Tartan* Factors 1, 4, and 5, and for the reasons discussed by Messrs. Arora, Meyer, and Michels in their Direct Testimonies.

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

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

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

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

Q. Please discuss the commitment from the second Stipulation, related to the CCN for the Big Hollow Energy Center that includes simple cycle gas generation paired with battery energy storage, in File No. EA-2025-0238.

A. Specific to future CCN cases, the Stipulation from this case required the Company to discuss any restrictions that prevented any particular generation technology from being considered to meet the need in that case. In compliance with this provision, see Mr. Michels testimony at pages 30-31 where he discusses the reasons that nuclear and fuel cell generation technologies are not viable alternatives to meet the entire Ameren Missouri customer need because of the scale of energy needed or in the case of nuclear, on the timeline required.

Q. And finally, please discuss the commitment from the third Stipulation, related to the CCN for the Reform Solar Energy Center in File No. EA-2025-0239.

A. In this Stipulation, the Company committed in future CCN cases to provide an updated IRP analysis using updated cost assumptions with its filing if the cost of the technology being deployed had increased 10% relative to another resource type that could meet the need. While the threshold trigger of a 10% cost differential is not triggered requiring this analysis, the Company provided an updated analysis nonetheless. Please see Mr. Michels testimony at pages 28-29, comparing the present value of revenue requirement of the plan including the Project with a plan that includes simple cycle gas generation, as well as a high-level assessment of the cost of additional renewables to supplement the NGSC production and replace the energy-producing capability of the Project.[8]

Q. Does this conclude your Direct Testimony?

A. Yes.

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[8] As I noted earlier, how the revenue requirement is allocated is not an issue in this CCN case and will be determined by the Commission in future rate proceedings.

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 and Necessity for A Natural Gas Electrical Generation Facility.	))))	File No.: EA-2026-0226

AFFIDAVIT OF STEVEN M. WILLS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Steven M. Wills, being first duly sworn on his oath, states:

My name is Steven M. Wills, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Steven M. Wills
Steven M. Wills

Sworn to me this 24th day of July, 2026.