



MISSOURI PUBLIC SERVICE COMMISSION

STAFF REBUTTAL TESTIMONY

APPENDIX 2

Staff Schedules

AMEREN MISSOURI

CASE NO. EA-2026-0183

Jefferson City, Missouri
August 2026

**** Denotes Confidential Information ****

***** Denotes Highly Confidential Information *****

EA-2026-0183 BESS In-Service Criteria
Lithium-Ion Battery Energy Storage System (BESS)
Proposed In-Service Criteria

1. All major construction work is complete.
2. All preoperational tests have been successfully completed.
3. Facility successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.
4. The facility demonstrated the ability to stop and start both charging and discharging when commanded to do so at a location from which it is normally operated.
5. Facility shall meet both 98% of the Guaranteed Power Capacity¹ and Guaranteed Energy Capacity² in the same test based on the Capacity Test in Attachment 1.³ The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions.
6. Sufficient transmission/distribution interconnection facilities shall exist for the total plant design net electrical capacity at the time the facility is declared fully operational and used for service.

¹ Guaranteed Power Capacity for Castle Bluff is 95MW, for Huck Finn is 200MW, and for Millcreek is 250MW.

² Guaranteed Energy Capacity for Castle Bluff is 380MW, for Huck Finn is 800MW, and for Millcreek is 1,000MW.

³ Attachment 1 refers to the Capacity Test Summary within Scott Wibbenmeyer's Direct Schedule SW-D8.

Ameren Missouri's
Response to MPSC Data Request - MPSC
EA-2026-0183
Tom Sawyer, 3 BESS, and Ringer

No.: MPSC 0097

Please explain what “charge power” and “discharge power” mean within Schedule SW-D8[HP1.1] of Scott Wibbenmeyer’s testimony. Please also clarify how these terms relate to the system’s “SOE” and “Guaranteed Power Capacity.” DR requested by Brodrick Niemeier (Brodrick.Niemeier@psc.mo.gov <<mailto:Brodrick.Niemeier@psc.mo.gov>>)

RESPONSE

Prepared By: Brad Wentz
Title: BESS Development Manager
Date: 7/7/2026

In a BESS, charge power (MW) is the rate at which electricity is absorbed from the grid and stored in the batteries, while discharge power (MW) is the rate at which electricity is delivered from the batteries to the grid. These values describe the system's instantaneous power capability. For example, a 100 MW BESS can charge at up to 100 MW and discharge at up to 100 MW.

State of Energy (SOE) is the amount of energy currently stored in the BESS, typically expressed as a percentage of its usable energy capacity. As the BESS charges, SOE increases; as it discharges, SOE decreases. For example, if a 400 MWh BESS has an SOE of 50%, approximately 200 MWh of usable energy remains available in the system.

Guaranteed Power Capacity is the contractual power level that the BESS is guaranteed to achieve while charging and discharging, measured at the point of interconnection. The system can sustain this power output only while sufficient energy remains available, as indicated by the SOE.

In summary, charge power and discharge power describe how fast energy moves into or out of the BESS, SOE describes how much energy remains stored, and Guaranteed Power Capacity defines the power level the system is contractually obligated to provide.

Case No. EA-2026-0183

**SCHEDULE BN-r3
and
SCHEDULE BN-r4**

HAVE BEEN DEEMED

HIGHLY CONFIDENTIAL

IN ENTIRETY

Summary of Application Requirements

On January 16, 2026, Ameren Missouri submitted a Notice of Case Filing, and on May 22, 2026, Ameren Missouri applied for a Certificate of Convenience and Necessity (“CCN”) in accordance with 393.170.1 RSMo, 20 CSR 4240-2.060, and 20 CSR 4240-20.045 to the Missouri Public Service Commission (“Commission”). The CCN application requests permission for Ameren Missouri to:

- Construct, install, own, operate, maintain, and otherwise control and manage a 95-megawatt¹ (“MW”) battery energy storage system ("BESS") facility to be constructed at the now-retired Meramec coal-fired facility, which is also the site of the under construction Castle Bluff simple cycle combustion turbine generator ("CTG") project previously approved by the Commission in File No. EA-2024- 0237, and located in St. Louis County, Missouri (the "Castle Bluff BESS Project");
- To construct, install, own, operate, maintain, and otherwise control and manage a 200 MW BESS facility to be constructed in Audrain County, Missouri at the site of the Company's Audrain Energy Center (the "Huck Finn BESS Project");
- To construct, install, own, operate, maintain, and otherwise control and manage a 250 MW BESS facility to be constructed in Lincoln County, Missouri (the "Millcreek BESS Project" and, together with the Castle Bluff BESS Project and the Huck Finn BESS Project, the "BESS Projects");

¹ CCN Application, page 1, footnote 2 “All references to generating capacity (MW) are to mega-watts-AC unless otherwise noted.”

- To construct, install, own, operate, maintain, and otherwise control and manage a new 161 kilovolt (“kV”) switching station (the “Quinn Switching Station”) in order to interconnect the Millcreek BESS Project to the existing 161 kV transmission system in Lincoln County, Missouri;
- To construct, install, own, operate, maintain, and otherwise control and manage, through the use of a Build Transfer Agreement (“BTA”), a 175 MW solar generation facility to be constructed in Audrain County, Missouri (the “Tom Sawyer Solar Project” or “Tom Sawyer”), adjacent to Ameren Missouri’s Huck Finn Solar Energy Center (“Huck Finn Solar”). The Project will include an approximately 2-mile generator lead-line interconnecting the Company’s existing Spencer Creek 345 kV switching station via a 345 kV lead-line shared with Huck Finn Solar;
- To construct, install, own, operate, maintain, and otherwise control and manage, through the use of a BTA, a 225 MW solar generation facility to be constructed in Stoddard County, Missouri (the “Ringer Solar Project” or “Ringer” and, together with the Tom Sawyer Solar Project, the “Solar Projects;” the BESS Projects and the Solar Projects, collectively the “Projects”). Page 3 of 46 Ringer will interconnect at the future Vanduser switching station on the Morely-Stoddard 161 kV transmission line.

Ameren Missouri’s CCN application further requests:

- Authority under Section 393.190.1 to complete the mergers under the BTAs for the Solar Projects;

- A variance from the requirement in 20 CSR 4240-20.045(5)(D) and 20 CSR 4240-20.045(3)(C) so that as-built drawings for the BESS Projects and the Solar Projects 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,
- A variance from the requirement in 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 BESS Projects and Solar Projects will commence commercial operation, also consistent with the condition relating to this requirement adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239.

Section 393.170.01, RSMo

Section 393.170.1 requires that for construction of an electrical plant by an electrical corporation, permission and approval by the Commission must be obtained prior to the commencement of the construction.

- Ameren Missouri will meet this requirement through the CCN application and review process, pending Commission approval.

20 CSR 4240-2.060

20 CSR 4240-2.060(1)(A) requires the legal name of each applicant, a brief description of the legal organization of each applicant; whether a Missouri corporation, foreign corporation, partnership, proprietorship, or other business organization; the street and

mailing address of the principal office or place of business of each applicant and each applicant's electronic mail address, fax number, and telephone number, if any.

- The CCN application section titled: I. Applicant, paragraphs 1 & 2, on pages 4 & 5 contains the required information.
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(12)(B) requires that if any applicant is a Missouri corporation, they must submit a Certificate of Good Standing from the secretary of state.

- The CCN application section titled: I. Applicant, paragraph 1 on page 5 contains the required information.²
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(C) requires that if any applicant is a foreign corporation, they must submit a certificate from the secretary of state that it is authorized to do business in Missouri.

- This requirement does not apply.

20 CSR 4240-2.060(1)(D) requires that if any applicant is a partnership, a copy of the partnership agreement must be submitted.

- This requirement does not apply.

² A Certificate of Corporate Good Standing is attached as Application Schedule B.

20 CSR 4240-2.060(1)(E) requires that if any applicant does business under a fictitious name, they must file a copy of the registration of the fictitious name with the secretary of state.

The CCN application section titled: I. Applicant, paragraph 1 on page 5 states “The Company’s Fictitious Name Registration as filed with the Missouri Secretary of State’s Office is attached hereto as Application Schedule A”.

- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(F) requires that if any applicant is a political subdivision, a specific reference to the statutory provision and a specific reference to any other authority, if any, under which it operates must be provided.

- This requirement does not apply.

20 CSR 4240-2.060(1)(G) requires that if any applicant has submitted the applicable information as detailed in subsections (1)(B-F) of this rule in a previous application, the same information may be incorporated by reference to the case number in which the information was furnished, so long as such applicable information is current and correct.

- Applicable information was submitted in a previous application which was properly referenced.³
- Ameren Missouri has met this requirement.

³ See CCN Application. I. Applicant, paragraph 1, page 5, which references “Case No. EA-87-105”.

20 CSR 4240-2.060(1)(H) requires a brief statement of the character of the business performed by each applicant.

- The CCN application section titled: I. Applicant, paragraph 1, page 5 and its associated Footnote 5 contains the required information.
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(I) requires the name, title, address, and telephone number of the person to whom correspondence, communication, and orders and decisions of the Commission are to be sent, if other than to the applicant's legal counsel.

- The CCN application section titled: I. Applicant, paragraph 2, page 5 contains the required information.
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(J) requires a list of all association members, if any applicant is an association other than an incorporated association or other entity created by statute.

- This requirement does not apply.

20 CSR 4240-2.060(1)(K) requires a statement indicating whether the applicant has any pending or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgement or decision has occurred within three (3) years of the date of the application.

- The CCN application section titled: I. Applicant, paragraph 3 on page 5 contains the required information.
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(L) requires a statement that there are no annual or regulatory assessment fees that are overdue.

- The CCN application section titled: I. Applicant, paragraph 4, page 5 contains the required information.
- Ameren Missouri has met this requirement.

20 CSR 4240-2.060(1)(M) requires that all applications shall be subscribed and verified by affidavit under oath by one (1) of the following methods: if an individual, by that individual; if a partnership, by an authorized member of the partnership; if a corporation, by an authorized officer of the corporation; if a municipality or political subdivision, by an authorized officer of the municipality or political subdivision; or, by the attorney for the applicant if the application includes or is accompanied by a verified statement that the attorney is authorized.

- Subscribed verification provided by Mr. Robert B. Dixon, Vice President of Regulatory and Legislative Affairs for Union Electric Company d/b/a Ameren Missouri by electronic signature on the un-numbered page immediately following page 46 of the CCN Application stating “[t]he undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Application* and further, under the penalty of perjury, declare that the foregoing is true and correct to the best of his knowledge and belief” and [t]his request is substantially consistent with the preferred resource plan required by 20 CSR 4240-Chapter 22.”
- Ameren Missouri has or will file a substitute verification to meet this requirement.

20 CSR 4240-20.045

20 CSR 4240-20.045(3)(A) requires that the application shall include facts showing that granting the application is necessary or convenient for public service.

- The CCN application section titled: D. The BESS Projects are Necessary or Convenient for the Public Service (“Tartan Factors”), and E. Other Filing Requirements for BESS Projects on pages 11 through 23 address this requirement. Note: The to be constructed Quinn Switching Station project described in the testimony of Ameren Missouri witness Harman Ormani is a necessary component of the Millcreek BESS project, serving as the point of interconnection, and is described in the CCN application section C. Project Description – Millcreek BESS Project in paragraph 18, pages 10 & 11, but does not have a specific detailed project description in sections D & E as do the individual Solar and BESS projects. The Quinn Switching Station project is necessary for the overall Millcreek BESS Project.
- Ameren Missouri has met this requirement.

20 CSR 4240-20.045 (3)(B) requires that if an asset to be operated or constructed is outside Missouri, the application shall include plans for allocating costs, other than regional transmission organization / independent system operator cost sharing, to the applicable jurisdiction.

- This requirement does not apply.

20 CSR 4240-20.045 (3)(C) requires that if any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.

- Ameren Missouri has requested a variance to this rule with respect to “As-Built” drawings, stating “as-built drawings for the BESS Projects and the Solar projects 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.”
- Ameren Missouri has also requested a variance to 20 CSR 4240-20.045 (6)(J), stating “... the Company’s plans for restoration of safe and adequate service can be provided closer to the time when the BESS Projects and Solar Projects will commence commercial operation, also consistent with the condition relating to this requirement adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239.” Note: Page 8, Lines 1 – 14 of Ameren Missouri Witness Harman Ormani states that Ameren Missouri “has documented processes governing responses to unplanned 5 outages. Ameren Missouri will apply these procedures to the Quinn Switching Station by clearly defining roles and responsibilities across its experienced group of subject matter experts.”
- Assuming approval of the variance requests, Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(A) requires a description of the proposed route or site of construction.

- The Castle Bluff BESS project construction is described in Section A, paragraph 8, pages 7 – 8.
- The Huck Finn BESS project construction is described in Section B, paragraph 13, page 9.
- The Millcreek BESS construction project and the Quinn Switching Station construction project are described in Section C, paragraph 18, pages 10 – 11.
- The Tom Sawyer Solar construction project is described in Section A, paragraph 39, page 25.
- The Ringer Solar construction project is described in Section B, paragraph 47, page 27.
- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(B) requires a list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in section 319.015, RSMo, which the proposed construction will cross.

- Regarding the Castle Bluff BESS project, in line E. 34. B. on page 16 of the CCN application, Ameren Missouri states “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 BESS Project site”.

- Regarding the Huck Finn BESS project, in line E. 35. B. on page 18 of the CCN application, Ameren Missouri states “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 are identified in Schedule C to this Application.”
- Regarding the Millcreek BESS project, in line E. 36. B. on page 20 of the CCN application, Ameren Missouri states: “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 are identified in Application Schedule D”. Note: The CCN application and Application Schedule D do not specifically state that Schedule D applies to both the Millcreek BESS project and Quinn Switching Station.
- Regarding the Tom Sawyer Solar project, in line D. 74. B. on page 37 of the CCN application, Ameren Missouri states “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 are identified in Application Schedule E.”
- Regarding the Ringer Solar Project, in line D. 77. B. on page 40 of the CCN application, Ameren Missouri states: 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 are identified in Application Schedule F.”

20 CSR 4240-20.045(6)(C) requires a description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly

identifies what will be the operational features of the asset once it is finally operational and used for service.

- Regarding the Castle Bluff BESS project, Ameren Missouri states the following in paragraph 34. c. on pages 16 – 17:

In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for the BESS Project is described in

Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for the Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) The BESS Project is estimated to cost approximately *** [REDACTED]

[REDACTED] ***;

(iv) The operational features of the asset once it is fully operational and used for service are discussed by Mr. Wibbenmeyer in his Direct Testimony.

- Regarding the Huck Finn BESS project, Ameren Missouri states the following in paragraph 35.c. on pages 18 -19:

In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for this BESS Project is described in

Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for this BESS Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) This BESS Project is estimated to cost approximately *** [REDACTED]

[REDACTED] ***;

(iv) The operational features of the asset once it is fully operational and used for service are discussed by Ameren Missouri Witness Mr. Wibbenmeyer in his Direct Testimony.

- Regarding the Millcreek BESS project and Quinn Switching Station project, Ameren Missouri states the following in paragraph 36.c. on pages 20 – 21:

In accordance with 20 CSR 4240-20.045(6)(C),

(i) The scope of the construction for this BESS Project is described in Mr. Wibbenmeyer's Direct Testimony;

(ii) Existing specifications and existing drawings for this BESS Project can be found in Schedule SW-D1 of Mr. Wibbenmeyer's Direct Testimony;

(iii) The BESS Project is estimated to cost approximately *** [REDACTED]

[REDACTED] ***;

(iv) The operational features of the assets once they are fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony.

- Regarding the Tom Sawyer Solar project, Ameren Missouri stated the following in paragraph 74.c. on page 37:

In accordance with 20 CSR 4240-20.045(6)(C),

(1) The scope of the solar construction Project is described in Mr. Wibbenmeyer's Direct Testimony;

(2) Existing solar project specifications and existing drawings for the Tom Sawyer Solar Project can be found in Exhibit A of Schedule SW-D10 of Mr. Wibbenmeyer's Direct Testimony;

(3) The base case estimated cost of the Tom Sawyer Solar Project is approximately *** [REDACTED] ***;

(4) The operational features of the Tom Sawyer Solar Project once it is fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony.

- Regarding the Ringer Solar project, Ameren Missouri stated the following in paragraph 77.c. on page 40 - 41:

In accordance with 20 CSR 4240-20.045(6)(C),

(1) The scope of the Project is described in Mr. Wibbenmeyer's Direct Testimony;

(2) Existing solar project specifications and existing drawings for the Ringer Solar Project can be found in Exhibit A of Schedule SW-D14 of Mr. Wibbenmeyer's Direct Testimony;

(3) The base case estimated cost of the Ringer Solar Project is approximately *** [REDACTED] ***;

(4) The operational features of the Ringer Solar Project, once it is fully operational and used for service are discussed in Mr. Wibbenmeyer's Direct Testimony.

- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(D) requires the projected beginning of construction date and the anticipated fully operational and used for service date of the asset.

- Regarding the Castle Bluff BESS project, paragraph d. on page 17 states:
“Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028.”
- Regarding the Huck Finn BESS Project, paragraph d. on page 19 states:
“Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028.”
- Regarding the Millcreek BESS Project and the Quinn Switching Station Project, paragraph d. on page 21 states: “Construction is expected to commence in Q1 2027 after the required permits are received, with the entire Project expected to be in service in Q2 2028.”
- Regarding the Tom Sawyer Solar Project, paragraph d. on page 37 states:
“Construction is expected to commence in the second quarter of 2027 after the required permits are received, and the Tom Sawyer Solar Project is expected to be placed in-service by the fourth quarter of 2028.”
- Regarding the Ringer Solar Project, paragraph d. on page 41 states: “Construction is expected to commence in March of 2027 after the required permits are received, and the Ringer Solar Project is expected to be placed in-service in the Q2 2029.”
- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(E) requires a description of any common plant to be included in the construction project.

- Regarding the Castle Bluff BESS Project, paragraph e. on page 17 states: “The water system will be treated as common plant with the Castle Bluff CTG Project previously approved by the Commission in File No. EA-2024-0237.”
- Regarding the Huck Finn BESS Project, paragraph e. on page 19 states: “At this time, no common plant is anticipated for the Project.”
- Regarding the Millcreek BESS Project and the Quinn Switching Station Project, paragraph e. on page 21 states: “At this time, no common plant is anticipated for the Project.”
- Regarding the Tom Sawyer Solar Project, paragraph e. on page 37 states:
“The Tom Sawyer Solar Project has no common plant to be included in the construction Project.”
- Regarding the Ringer Solar Project, paragraph e. on page 41 states: “The Ringer Solar Project has no common plant to be included in the construction Project.”
- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(F) requires plans for financing construction of the asset.

- Regarding the Castle Bluff BESS Project, paragraph f. on page 17 states:
“Ameren Missouri's plans for financing the BESS Project are discussed in Ameren Missouri Witness Mr. Lansford's Direct Testimony.”

- Regarding the Huck Finn BESS Project, paragraph f. on page 19 states:
“Ameren Missouri's plans for financing this BESS Project are discussed in the Mr. Lansford's Direct Testimony.”
- Regarding the Millcreek BESS Project and the Quinn Switching Station Project, paragraph f. on page 21 states: “Ameren Missouri's plans for financing this BESS Project are discussed in the Mr. Lansford's Direct Testimony.”
- Regarding the Tom Sawyer Solar Project, paragraph f. on page 37 states:
“Ameren Missouri's plans for financing the Tom Sawyer Solar Project are discussed in the Direct Testimony of Mr. Lansford.”
- Regarding the Ringer Solar Project, paragraph f. on page 41 states:
“Ameren Missouri's plans for financing the Ringer Solar Project are discussed in the Direct Testimony of Mr. Lansford.”
- Ameren Missouri has met this requirement.

20 CSR 4240-045(6)(G) requires a description of how the proposed asset relates to the electric utility’s adopted preferred plan under 20 CSR 4240-22.⁴

- Regarding the Castle Bluff BESS Project, paragraph g. on page 17 states:
“The BESS Project is contemplated by the Company’s 2025 PRP as explained in the Mr. Michels Direct Testimony.”

⁴ The Rule citation references 4 CSR 240-22.

- Regarding the Huck Finn BESS Project, paragraph g. on page 19 states: “This BESS Project is contemplated by the Company’s 2025 PRP as explained in Mr. Michels’ Direct Testimony.”
- Regarding the Millcreek BESS Project, paragraph g. on page 21 states: “The BESS Project is contemplated by the Company’s 2025 PRP as explained in the Mr. Michels’ Direct Testimony.”
- Regarding the Tom Sawyer Solar Project, paragraph g. on page 38 states: “The Tom Sawyer Solar Project is contemplated by the Company’s 2025 Preferred Resource Plan as explained in the Direct Testimony of Mr. Michels.”
- Regarding the Ringer Solar Project, paragraph g. on page 41 states: “The Ringer Solar Project is contemplated by the Company’s 2025 Preferred Resource Plan as explained in the Direct Testimony of Mr. Michels.”
- Ameren Missouri has met this requirement.

20 CSR 4240-045(6)(H) requires an overview of the electric utility’s plan for this project regarding competitive bidding, although competitive bidding is not required, for the design, engineering, procurement, construction management, and construction of the asset.

- Regarding the Castle Bluff BESS Project, paragraph h. on page 17 states:
 “As explained in Mr. Wibbenmeyer’s Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract. Ameren Missouri relied on a competitive bidding process for the EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer’s Direct Testimony. The EPC contractor

will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials.”

- Regarding the Huck Finn BESS Project, paragraph h. on page 19 states:

“As explained in the Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract. Ameren Missouri relied on a competitive bidding process for EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer’s Direct Testimony. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials.”
- Regarding the Millcreek BESS Project, paragraph h. on page 21 states: “As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri will utilize direct purchases by the Company and an EPC contract.⁵ Ameren Missouri relied on a competitive bidding process for the EPC and equipment supply for the BESS Projects as described in Mr. Wibbenmeyer’s Direct Testimony. The EPC contractor will be responsible for all balance of plant design, foundations, buildings, materials, commissioning, and erection of Ameren Missouri-furnished materials.”
- Regarding the Tom Sawyer Solar Project, paragraph h. on page 38 states:

“As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri utilized a request for proposal process to select the Tom Sawyer Project. Because the Company is not constructing the Project itself but is contracting to acquire it

⁵ CCN Application, page 21, footnote 7, “The Company will continue to evaluate whether to include the battery equipment in the EPC's scope and if more economical, could decide to procure the equipment itself.”

through a BTA, any competitive bidding for design, engineering, procurement, construction management, and construction is the responsibility of the Project developer.”

- Regarding the Ringer Solar Project, paragraph h. on page 41 states: “As explained in Mr. Wibbenmeyer's Direct Testimony, Ameren Missouri utilized a request for proposal process to select the Ringer Solar Project. Because the Company is not constructing the Ringer Project itself but is contracting to acquire it through a BTA, any competitive bidding for design, engineering, procurement, construction management, and construction is the responsibility of the Project developer.”
- Ameren Missouri has met this requirement.

20 CSR 4240-045(6)(I) requires an overview of plans for operating and maintaining an asset.

- Regarding the Castle Bluff BESS Project, paragraph i. on pages 17 & 18 states: “The BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri’s existing generation is operated. More specifically, this BESS Project will be operated by Ameren Missouri's Energy Management & Trading group, similar to the Company’s other supply-side resources. Ameren Missouri will coordinate all operations with MISO, of which Ameren Missouri is a member.”
- Regarding the Huck Finn BESS Project, paragraph i. on pages 19 & 20 states: “This BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri’s existing generation is operated. More specifically, the BESS Project will be operated by Ameren Missouri's Energy Management & Trading group,

similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with the MISO, of which Ameren Missouri is a member."

- Regarding the Millcreek BESS Project, paragraph i. on page 22 states: "This BESS Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation is operated. More specifically, the BESS Project will be operated by Ameren Missouri's Energy Management & Trading group, similar to the Company's other supply-side resources. Ameren Missouri will coordinate all operations with the MISO, of which Ameren Missouri is a member."
- Regarding the Tom Sawyer Solar Project, paragraph i. on page 38 states: "The Tom Sawyer Solar Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation and switching stations are operated, including its existing renewable generation and the associated interconnections. More specifically, the Tom Sawyer Solar Project will be operated by Ameren Missouri, with the operation of the solar facility managed by the Ameren Missouri Energy Management & Trading group, similar to the Company's other large-scale renewable generators such as Atchison County and High Prairie Wind Energy Centers and Boomtown, Huck Finn, and Cass County Solar Energy Centers. Ameren Missouri will coordinate all operations of the solar facility with the MISO, of which Ameren Missouri is a member."
- Regarding the Ringer Solar Project, paragraph i. on pages 41 & 42 states:

"The Ringer Solar Project will be operated and maintained in the same manner and fashion as all of Ameren Missouri's existing generation and switching stations are

operated, including its existing renewable generation and the associated interconnections. More specifically, the Ringer Solar Project will be operated by Ameren Missouri, with the operation of the solar facility managed by the Ameren Missouri Energy Management & Trading group, similar to the Company's other large-scale renewable generators such as Atchison County and High Prairie Wind Energy Centers and Boomtown, Huck Finn, and Cass County Solar Energy Centers. Ameren Missouri will coordinate all operations of the solar facility with the MISO, of which Ameren Missouri is a member.”

- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(J) requires an overview of plans for safe and adequate service after significant, unplanned/forced outages of an asset.

- Regarding the Castle Bluff BESS Project, paragraph j. on page 18 states:
“Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J), allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that this BESS Project is placed in-service and final plans sixty (60) days after the Project is placed in-service.”
- Regarding the Huck Finn BESS Project, paragraph j. on page 20 states: “Ameren Missouri requests a variance from the provisions of 20 CSR 4240- 20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the

time that this BESS Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service.”

- Regarding the Millcreek BESS Project, paragraph j. on page 22 states: “Ameren Missouri requests variance from the provisions of 20 CSR 4240- 20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that this BESS Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service.” Note: Specific to the Quinn Switching Station portion of the Millcreek BESS Project, Page 8, Lines 1 – 14 of Ameren Missouri Witness Harman Ormani states that Ameren Missouri “has documented processes governing responses to unplanned outages. Ameren Missouri will apply these procedures to the Quinn Switching Station by clearly defining roles and responsibilities across its experienced group of subject matter experts.”
- Regarding the Tom Sawyer Solar Project, paragraph j. on pages 38 & 39 states: “With respect to the Project, Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that the Tom Sawyer Solar Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service, as adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239.”

- Regarding the Ringer Solar Project, paragraph j. on page 42 states: “With respect to the solar facility, Ameren Missouri requests a variance from the provisions of 20 CSR 4240-20.045(6)(J) allowing it to submit an overview of its plans for restoration of safe and adequate service after significant, unplanned/forced outages ninety (90) days prior to the time that the Ringer Solar Project is placed in-service and final plans within sixty (60) days after the Project is placed in-service, as adopted by the Commission in File Nos. EA-2025-0238 and EA-2025-0239.”
- Ameren Missouri has met this requirement.

20 CSR 4240-20.045(6)(K) requires an affidavit or other verified certification of compliance with the following notice requirements to landowners directly affected by electric transmission line routes or transmission substation locations proposed by the application. The proof of compliance shall include a list of all directly affected landowners to whom notice was sent.

- Regarding the Castle Bluff BESS Project, paragraph k. on page 18 states:
“There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company owns the land on which this BESS Project will be constructed so no landowners will be directly affected.”
- Regarding the Huck Finn BESS Project, paragraph k. on page 20 states: “There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company owns the land on which this BESS Project will be constructed so no landowners will be impacted.”

- Regarding the Millcreek BESS Project, paragraph k. on page 22 states: “There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the Company has already obtained all necessary land rights for the land on which the BESS Project will be constructed.”
- Regarding the Tom Sawyer Solar Project, paragraph k. on page 39 states: “There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the BTA contractor has responsibility for, and has already procured, all necessary land rights.”
- Regarding the Ringer Solar Project, paragraph k. on page 42 states: “There is no requirement of the Company to provide notice in compliance with 20 CSR 4240-20.045(6)(K) because the BTA contractor has responsibility for, and has already procured, all necessary land rights.”
- As summarized by the Ameren Missouri responses, this requirement does not apply.

Staff Witness: Donald A. Fontana, PE

Case No. EA-2026-0183

**SCHEDULE DAF-r2
through
SCHEDULE DAF-r6**

HAVE BEEN DEEMED

CONFIDENTIAL

IN ENTIRETY

Case No. EA-2026-0183

SCHEDULE HKP-r1

HAS BEEN DEEMED

HIGHLY CONFIDENTIAL

IN ITS ENTIRETY

Ameren Missouri's
Response to MPSC Data Request - MPSC
EA-2026-0183
Tom Sawyer, 3 BESS, and Ringer

No.: MPSC 0027

1. How does Ameren Missouri characterize the terms “Reasonable Cost” and “Economic Feasibility” in relation to the Projects that the Company is requesting authorization for in this application? 2. Has the Company changed the way it thinks about or applies these definitions because of the recent increase in large power customers? Requested by: H Poudel (Hari.Poudel@psc.mo.gov)

RESPONSE

Prepared By: Steven M Wills

Title: Senior Director, Regulatory Affairs

Date: June 24, 2026

- 1) Please refer to my direct testimony at pages 10-12 for a discussion of how the Company characterizes economic feasibility with respect to the projects. With respect to "reasonable cost," there is no single definition or metric that establishes the reasonableness of a particular cost, but some indicia of the reasonableness of the cost of the resources in this case are similar to some of the indicia economic feasibility I discussed in that testimony. Specifically, that the resources are included in a preferred resource plan that was selected through an IRP process with a primary criterion of minimizing the net present value of revenue requirement, and that the specific resources relied upon a competitive RFP and/or other well-established procurement practices and policies designed to ensure that the Projects are built at a competitive market-based cost given the need the project is designed to meet and the timing of when those terms must be met.
- 2) No.

Ameren Missouri's
Response to MPSC Data Request - MPSC
EA-2026-0183
Tom Sawyer, 3 BESS, and Ringer

No.: MPSC 0040

Separately for each of the projects in this docket: 1. Please provide all criteria used by Ameren Missouri to score each and every RFP response. Please include the scorecard matrix and weight for each criterion, if applicable. Please provide scorecard(s) and evaluations for each proposal by any outside consultant (if utilized), as well as Ameren Missouri's scorecard(s) and evaluations for each proposed bid with all notes and conclusions included. 2. If the lowest bid was not selected please list all criteria that were considered that justified the selection of a costlier option. Provide a detailed explanation and a copy of all source documents relied upon to make the selection. 3. Provide a copy of all presentations made to Ameren Missouri's board of directors regarding item (3) above. DR requested by Paul Amenthor

RESPONSE

Prepared By: Jared Schneider

Title: Manager, Renewable Development Regulatory & Strategy

Date: 7/13/26

BESS Projects

1. Ameren Missouri scored all RFP responses on the following categories: Quality Program, Project Schedule, Schedule Milestones, Comprehensiveness of submitted bid package, Experience, Construction Partners, Design, Material Selection, Technical Exceptions, Commercial Exceptions, Safety, Economic Impact Indicator, and Total Price. Please see the attachment titled, "Big Hollow BESS RFP Scorecard" provided in response to data request MPSC 0016 in File No. EA-2025-0238, which includes the scores of each bid. No additional criteria were used beyond what is captured in the scorecard.

Please see page 16, line 1 through page 17, line 18 in the testimony of Company witness Scott Wibbenmeyer for details regarding the Company's decision regarding EPC and battery supply contracts for the BESS projects in this case. Additionally, the Company received updated bids from each supplier related to each BESS project in this case and reviewed for technical accuracy, cost, schedule, construction partners, and exceptions.

2. Based upon the Big Hollow RFP the lowest cost bidder was selected. Please see page 16, line 1 through page 17, line 18 in the testimony of Company witness Scott Wibbenmeyer

for details regarding the Company's decision regarding EPC and battery supply contacts for the BESS projects in this case.

3. Please see the Company's response to DR MPSC 0034 for all presentations made to Ameren's Board of Directors.

Solar Projects

1. Please see the response to data request MPSC 0015.
2. As described in the Direct Testimony of Company witness Scott Wibbenmeyer, the Solar Projects were initially selected through a competitive Request for Proposals (RFP) process designed to obtain transparent, market-based information and to evaluate projects across a range of criteria, including but not limited to project pricing, project size, project maturity, interconnection costs, constructability, and developer experience. This process was intended to assess overall project economics, feasibility, and risk on a holistic basis rather than relying on any single factor.
3. Please see the Company's response to DR MPSC 0034 for all presentations made to Ameren's Board of Directors.

Ameren Missouri's
Response to MPSC Data Request
EA-2025-0238
Big Hollow CCN

No.: MPSC 0016

1. Please provide all criteria used by Ameren Missouri to score all RFP responses. 2. Please provide a complete copy of the scores assigned to each bid with all notes and conclusions included. 3. If the lowest bid was not selected please list all criteria that was considered that justified the selection of a more costly option. Provide a detailed explanation and a copy of all source documents relied upon to make the selection. 4. Provide a copy of all presentations made to Ameren Missouri's board of directors regarding item 3 above. DR requested by Claire Eubanks (Claire.eubanks@psc.mo.gov <<mailto:Claire.eubanks@psc.mo.gov>>).

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Date.)

Prepared By: David Meiners; Brad Wentz

Title: Director, New Gas Generation; BESS Manager

Date: 07/25/25

*****HIGHLY CONFIDENTIAL ATTACHMENTS*****

Big Hollow BESS

1. Ameren Missouri scored all RFP responses on the following categories: Quality Program, Project Schedule, Schedule Milestones, Comprehensiveness of submitted bid package, Experience, Construction Partners, Design, Material Selection, Technical Exceptions, Commercial Exceptions, Safety, Economic Impact Indicator, and Total Price.

2. Please see the attachment titled, "*Big Hollow BESS RFP Scorecard*" which includes the scores of each bid. No additional criteria were used beyond what is captured in the scorecard.

3a. The lowest overall bid submitted (EDF supplying Powin battery containers) was knocked out due to the unproven battery technology proposed (Powin Pod) and the fact that Powin filed for bankruptcy after submitting their original bid. The lowest remaining valid bid has been selected, but it is contingent upon reaching final terms with this bidder.

3b. All RFP submissions were provided in response to MPSC 0012.

4. All Board of Directors, ALT, ELT, and SLT meeting documents are posted to Ameren Missouri's secure "view only" site for Staff. Please contact the Missouri Regulatory Paralegals at MORegParalegals@ameren.com for access.

Big Hollow CTG

For questions 1, 2, and 3, please see the response to data request MPSC 0012.

Regarding question 4, all Board of Directors, ALT, ELT, and SLT meeting documents are posted to Ameren Missouri's secure "view only" site for Staff. Please contact the Missouri Regulatory Paralegals at MORegParalegals@ameren.com for access.

Case No. EA-2026-0183

SCHEDULE MB-r1

HAS BEEN DEEMED

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IN ITS ENTIRETY

Ameren Missouri's
Response to MPSC Data Request - MPSC
EA-2026-0183
Tom Sawyer, 3 BESS, and Ringer

No.: MPSC 0098

Is the company anticipating an increased Missouri Energy Standard ("RES") requirement due to the associated anticipated Large Loads? Please explain.

RESPONSE

Prepared By: Jared Schneider

Title: Manager, Renewable Development Regulatory & Strategy

Date: 7/8/26

Yes. Large Load customers would be considered retail electric customers and thus their electric load would be included in the definition of total retail electric sales for which the RES requirement applies.

However, in File No. ET-2025-0184, a variance to the RES requirement was approved by the Commission which would exclude from the calculation of "total electric sales" as defined in 20 CSR 4240-20.100(1)(W) a large load customer's entire load that is supported with renewable attributes it receives or is reasonably projected to receive that are sufficient to cover the applicable "RES portfolio requirement" as defined in 20 CSR 4240-20.100(1)(R).

While it is likely there will be some large load customers that qualify for the variance, it is also likely that not all would meet the requirements of the variance, and thus there would be an increase in the Missouri RES requirement due to large loads.

Additionally, as shown in the Company's RES Plan for 2026-2028 and described in response to data request MPSC 0007 in the Company's RES filing (Filee No. EO-2026-0276), the solar projects contemplated in this case align with the capacity additions needed to meet increased RES requirements.

Case No. EA-2026-0183

SCHEDULE MB-r3

HAS BEEN DEEMED

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IN ITS ENTIRETY

Case No. EA-2026-0183

SCHEDULE RTJ-r1

HAS BEEN DEEMED

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