

# **BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

**Case No. EA-2026-0183**

## **Citizen Questions and Requests for Clarification Regarding the Proposed Ameren Missouri Energy Projects**

### **Statement of Purpose**

The projects proposed in Case No. EA-2026-0183 represent significant long-term investments in Missouri's electric infrastructure. If approved, they will affect Missouri landowners, agriculture, natural resources, local governments, emergency services, and electric customers for decades.

The purpose of this submission is to identify issues that I believe deserve additional clarification before a final decision is rendered and to assist in the development of as complete an evidentiary record as reasonably possible. These questions are submitted in the interest of transparency, informed public participation, and sound decision-making.

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### **Introduction**

I submit the following questions as a concerned Missouri citizen after attending the July 28, 2026 public hearing in Eolia and reviewing the application and publicly available filings associated with this proceeding.

The public hearing demonstrated that many citizens continue to have questions regarding both the proposed projects and the Commission's review process. While individual concerns may differ, I believe a complete public record benefits not only the Commission, but also the Applicant, affected landowners, local governments, and the citizens whose communities will be affected by these decisions.

Some of the questions below may already be addressed somewhere within the application, testimony, or supporting exhibits. Others may ultimately fall outside the legal scope of this proceeding or be more appropriately addressed by another governmental agency.

If these matters have already been addressed, I respectfully request reference to the applicable portions of the record. If they have not, I respectfully request that they be addressed before the Commission reaches a final decision so that both the Commission and the public have the benefit of as complete an understanding of these projects as reasonably possible.

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## **I. Commission Process and Development of the Record**

1. Do written comments submitted by email become part of the official case record?
  2. Does all written and oral public testimony remain part of the permanent record, even when portions of that testimony extend beyond the legal scope of this proceeding?
  3. If testimony discusses reasonably foreseeable future projects related to this application, how is that testimony considered by the Commission?
  4. Can the Commission approve, deny, or condition approval of individual projects included within Case No. EA-2026-0183, or must the application be approved or denied as a whole?
  5. If substantial new information is introduced after the local public hearings through Staff testimony, rebuttal testimony, or additional filings, will the Commission consider holding additional public hearings so citizens may review and comment on the completed evidentiary record before a final decision is issued?
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## **II. Future Development**

Large infrastructure projects are often developed in phases over many years.

6. If the Millcreek BESS project is approved at its currently proposed footprint, would any future expansion require a separate application and Commission approval?
  7. How does the Commission evaluate reasonably foreseeable future expansion when determining whether approval of the current application is in the public interest?
  8. If future battery storage, transmission facilities, generation projects, industrial development, or large electrical loads are anticipated but are not included in this application, how are those cumulative impacts considered during the Commission's review?
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# III. Water Resources and Environmental Protection

After reviewing the publicly available information, I have been unable to determine several aspects of the proposed facility's water management.

9. Will the proposed Millcreek BESS facility utilize liquid cooling or another thermal management system?
  10. If liquid cooling is proposed, what water resource studies have been completed or are planned?
  11. How will cooling water be managed, recycled, or disposed of during the operational life of the facility?
  12. Will stormwater runoff retention or containment facilities be constructed?
  13. Because the proposed site is located near the headwaters of Mill Creek and ultimately drains toward the Logan Wildlife Refuge and the Clarence Cannon watershed, what evaluations have been performed regarding long-term changes in runoff quantity, runoff quality, and downstream impacts compared to the current agricultural use?
  14. Will localized environmental impact studies be completed for each individual project included within this application?
  15. If those studies are prepared, when and where will they be available for public review before the Commission reaches its decision?
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# IV. Emergency Response

Battery Energy Storage Systems present emergency response challenges that differ from many traditional electrical facilities.

16. What emergency response plans are being developed for these facilities?
  17. What specialized training will be provided to local emergency responders?
  18. Who is financially responsible for providing that training?
  19. Who is financially responsible for any specialized firefighting equipment that may become necessary?
  20. How will emergency response plans, training, and equipment be maintained throughout the operational life of these facilities as battery technologies evolve?
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## **V. Project Economics and Alternatives**

During the July 28 public hearing, Ameren representatives stated that urban solar development, including commercial rooftops and parking lot installations, was not considered economically practical.

21. What analyses support that conclusion?
  22. Has the Commission reviewed those analyses as part of this proceeding?
  23. What financial analyses are reviewed by the Commission when evaluating these projects?
  24. Are project economics, anticipated utilization, future demand, return-on-investment assumptions, or future customer contracts considered as part of the Commission's public-interest determination?
  25. How were alternative project locations evaluated before selecting the proposed sites?
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## **VI. Facility Security**

26. What security measures are planned for each proposed facility?
  27. During the July 28 public hearing, an Ameren representative stated that security cameras, including Automatic License Plate Recognition (ALPR) systems, were not planned. Can that statement be confirmed, and if so, what alternative security measures are proposed?
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## **VII. Technical Information**

28. Do the proposed Battery Energy Storage Systems produce measurable electromagnetic or radiated emissions during normal operation?
  29. If testing has been performed, was that testing conducted using equipment substantially similar to the proposed Millcreek installation?
  30. Where may members of the public review those reports?
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## **VIII. Long-Term Stewardship**

31. What is the anticipated operational life of the proposed battery systems and associated infrastructure?
32. Which major components are expected to require replacement during the life of the project?
33. Would replacement of major equipment require additional Commission approval?

34. What financial assurance exists to ensure complete decommissioning and site restoration regardless of future ownership?
  35. How are decommissioning cost estimates reviewed and updated throughout the life of the project?
  36. Who verifies that decommissioning and restoration have been completed according to approved standards?
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## **Request for Additional Public Participation**

The evidentiary record in this proceeding will continue to develop after the local public hearings through Staff testimony, rebuttal testimony, and other filings.

If substantial new information is introduced after citizens have had an opportunity to testify, I respectfully request that the Commission consider holding at least one additional regional public hearing before issuing its final order. Doing so would allow citizens to review and comment on the complete evidentiary record rather than only the initial application and would further the Commission's commitment to transparency and meaningful public participation.

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## **Closing**

The questions presented in this submission are offered because I believe decisions of this magnitude deserve the most complete factual record reasonably possible before final action is taken.

These projects have the potential to influence Missouri communities, agriculture, emergency services, land use, and electrical infrastructure for many decades. Careful consideration of these issues today will help ensure that future decisions are informed not only by technical and economic analyses, but also by the practical questions and concerns of the citizens who will live with the long-term consequences of those decisions.

I respectfully request that the Commission consider the questions presented herein as part of its ongoing review of Case No. EA-2026-0183 and that, where appropriate, the Applicant, Staff, or other parties provide clarification so these matters become part of the evidentiary record before a final decision is rendered.

**Respectfully submitted,**

**Jacob Burns**