

Exhibit No.: _____
Issue(s): Large Load Customers/Load Forecast/
Solar Accredited Capacity/Battery
Energy Storage Systems
Witness/Type of Exhibit: Seaver/Rebuttal
Sponsoring Party: Public Counsel
Case No.: EA-2026-0183

REBUTTAL TESTIMONY

OF

JORDAN SEAVER

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

CASE NO. EA-2026-0183

Denotes Highly Confidential Information that has been redacted

August 11, 2026

PUBLIC

TABLE OF CONTENTS

<u>Testimony</u>	<u>Page</u>
Introduction	1
Large Load Customer Growth	2
Solar Generation and Battery Energy Storage Systems (“BESS”)	12

**REBUTTAL TESTIMONY
OF
JORDAN SEAVER
Union Electric Company d/b/a Ameren Missouri
CASE No. EA-2026-0183**

I. INTRODUCTION

Q. What is your name and what is your business address?

A. My name is Jordan Seaver, and my business address is 200 Madison Street, Governor Office Building, Suite 650, Jefferson City, MO 65102.

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

A. I am employed by the Office of Public Counsel (“OPC”) as a Policy Analyst.

Q. Have you previously testified before the Missouri Public Service Commission (“The Commission”)?

A. Yes, I have previously testified before the Missouri Public Service Commission. See Schedule JS-R-1 for my past pre-filed testimony and memoranda.

Q. What are your work and educational backgrounds?

A. I have been employed as a Policy Analyst by OPC since January 2022. I have attended Michigan State University’s Institute of Public Utilities (“IPU”) Accounting and Ratemaking Course, as well as the National Association of Regulatory Utility Commissioners (“NARUC”) Rate School. I previously worked as a Legal Assistant for Cascino Vaughan Law Offices for 7 years. I have a Master of Arts in Philosophy from the University of Wyoming, and a Bachelor of Arts in Philosophy from the University of Illinois at Chicago.

Q. What is the purpose of your Rebuttal testimony?

A. The purpose of my rebuttal testimony is to present and support the OPC’s position that the costs associated with approval of this certificate of convenience and necessity (“CCN”) should be borne by the expected and confirmed large load customers that are necessitating the buildout of Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or the

1 “Company”) generation fleet at this time. The Commission is being asked to
2 approve generation that is needed as quickly as possible only because of
3 expected and confirmed large load customers coming online in the very near
4 future. For the capacity that customers would be getting, this requested
5 generation is extremely expensive. Furthermore, the requested solar projects
6 are not dispatchable generation, and the battery energy storage systems
7 (“BESS”) are not generation, so only serve specific, tailored purposes and for
8 capacity.

9 Thus, I believe that the Company should declare that the costs incurred for
10 these projects should be fully allocated to the large load customer class. If the
11 Company stays silent on who will pay for these projects in this case, the
12 Commission should determine in a future rate recovery case that the costs
13 incurred for these projects should be fully allocated to the large load customer
14 class.

15 Finally, in this testimony I recommend that the Commission order the Castle
16 Bluff BESS facility be co-located with the Ringer Solar Project, both requested
17 in this case.

18 **II. LARGE LOAD CUSTOMER GROWTH**

19 **Q. Has the Company stated in this case that the projects in this CCN**
20 **request are at all related to expected or confirmed large load**
21 **customers?**

22 **A.** Yes. Company witness Rob Dixon states in his direct testimony in this case that
23 there will be “significant large load customer load growth as evidenced by the
24 Electric Service Agreements (“ESAs”) executed in the first and second quarters
25 of this year.”¹ He continues, saying, “These ESAs obligate the Company to

¹ Rob Dixon, Direct Testimony, Case No. EA-2026-0183, p 7.

1 provide service to customers whose contract capacity will total approximately
2 2,800 MW when they reach full load” and that they will reach full load in the
3 coming years². He states further that “the Company has construction
4 agreements in place with other prospective large load customers totaling an
5 additional 600 MW and if ESAs are finalized with some or all of those prospective
6 customers, it will drive load growth beyond the 2,800 MW of large loads for which
7 ESAs are already in place.”³ According to the direct testimony of both Mr. Steven
8 Wills and Mr. Dixon, the 2,800 MW of new customer load is not speculative, nor
9 is it tentative, but is certain, and is expected to come online within years, not
10 decades. This means that any generation needed to meet this load needs to come
11 on as quickly as can reasonably be managed.

12 Company witness Matt Michels says in his direct testimony that the Company
13 filed a Notice of Change in its preferred resource plan (“PRP”) in 2025. He states
14 the primary reasons for the filing as “at that time, the Company had experienced
15 a surge in interest from LLCs [(large load customers)] locating in Ameren
16 Missouri’s service territory and had signed construction agreements relating to
17 over two gigawatts of new load.”⁴ He states that the Company, at the time of
18 filing the Notice of Change to the PRP, “expected as much as approximately 2
19 GW of such loads to begin ramping up on the system as early as 2026 and to be
20 fully ramped-up within three to five years.”⁵ In fact, Mr. Michels states later
21 that the Company arrived at its new PRP by evaluating “a range of potential
22 outcomes, or cases, for what its system load would be if new large loads were
23 added”⁶. And, after looking at the changes to the 2023 PRP for each case,
24 “selected the plan that 1) best represents expectations of future large load
25 additions at the time the 2025 PRP was adopted, 2) provides some flexibility in

² *Ibid.*

³ *Ibid.*

⁴ Matt Michels, Direct Testimony, Case No. EA-2026-0183, p 4.

⁵ Matt Michels, Direct Testimony, Case No. EA-2026-0183, p 4.

⁶ *Ibid.*, p 8.

1 the near-term regarding further large load additions, and 3) ensures the
2 Company maintains both short-term and long-term resource flexibility to
3 address various risks to its portfolio.”⁷ He then spends the next 4 pages
4 discussing the large load cases evaluated for the new PRP and reassuring us that
5 existing customers’ load will still be served.

6 Company witness Steven Wills states in his direct testimony in this case that
7 “Growth in demand expected from large load customers...is making the
8 Company’s prospective need for capacity and energy resources increasingly acute
9 and urgent.”⁸ He, like Mr. Michels, covers how the new PRP was changed “due
10 to changes in load expectations arising from the high level of interest the
11 Company was receiving from large load customers”⁹ and states that “since that
12 change in PRP, the Company has announced that it has entered into ESAs to
13 serve 2.8 Gigawatts (“GW”) of large load demand. The impact of this new
14 expected demand on the Company’s retail load forecast results in the need for
15 additional capacity to maintain resource adequacy, as well as energy
16 resources”¹⁰.

17 **Q. Are the residential, commercial, and industrial classes experiencing**
18 **similar, equivalently large increases in load?**

19 **A.** The Company has not presented an increase equivalent to or even near the
20 percentage increase in the new, large load customers for the residential,
21 commercial, or industrial classes¹¹. Nothing in the 2023 IRP was presented
22 showing an expected large increase in residential, industrial, large, or small
23 general service customers’ load.

⁷ *Ibid.*

⁸ Steven Wills, Direct Testimony, Case No. EA-2026-0183, pp 3-4.

⁹ *Ibid.*, p 4.

¹⁰ Steven Wills, Direct Testimony, Case No. EA-2026-0183, p 4.

¹¹ For clarity and consistency with the Company’s terminology used in the documents discussed below, I will from hereon call these classes “residential”, “commercial”, and “industrial”.

1 For the residential class, the 2023 IRP document Vol. 3 Load Analysis and
2 Forecasting filed in Case No. EO-2024-0020 presented the Company's analysis
3 on historic residential load growth. That analysis found that between 2005 and
4 2012, there was a growth in residential load at a compound annual rate of 0.36%.
5 It found that between 2013 and 2022 "Sales growth due to customer growth...was
6 diminished by naturally occurring and company sponsored energy efficiency
7 programs" and that "Residential sales grew in 2020 by 2.0% due to the COVID-
8 19 pandemic and an increase in telework" which trend was seen across the
9 country in other utilities.¹²

10 This document also included the Company's prediction for residential load
11 growth out to 2042. Based on the historical analysis and the planning case
12 forecast, "residential load is anticipated to grow at a compound annual rate of
13 1.0% between 2024 and 2043."¹³ Residential class customer numbers were not
14 expected to grow by much, either, with "a compound annual rate of 1.0% between
15 2024 and 2043"¹⁴ expected.

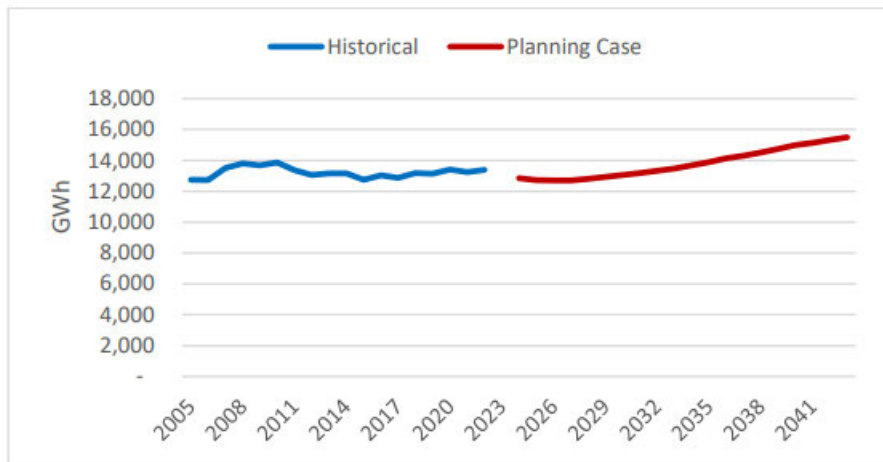
16 Below is the graph presented in this report showing the historical and projected
17 residential sales growth.

¹² 2023 IRP Vol. 3. Load Analysis and Forecasting, Case No. EO-2024-0020, p 34.

¹³ *Ibid.*

¹⁴ *Ibid.*

Figure 3.16: Planning Case Forecast of Residential Energy Sales



The commercial class analysis included in the 2023 IRP showed historical growth similar to the residential class. “Between 2004 and 2012, weather normalized sales grew at a compound annual rate of 1.0%” and, further similar to residential sales, “commercial sales were impacted by the recession and have grown more slowly than the previous historical trend since 2009”¹⁵. The major difference historically between the commercial and residential class was a 6.6% decrease in sales in 2020 due to a large increase in remote work¹⁶. The analysis and planning case forecast led the Company to state that “Ameren Missouri anticipates commercial sales to grow at a compound annual rate of 0.4% in the planning scenario over [the] next 20 years.”¹⁷

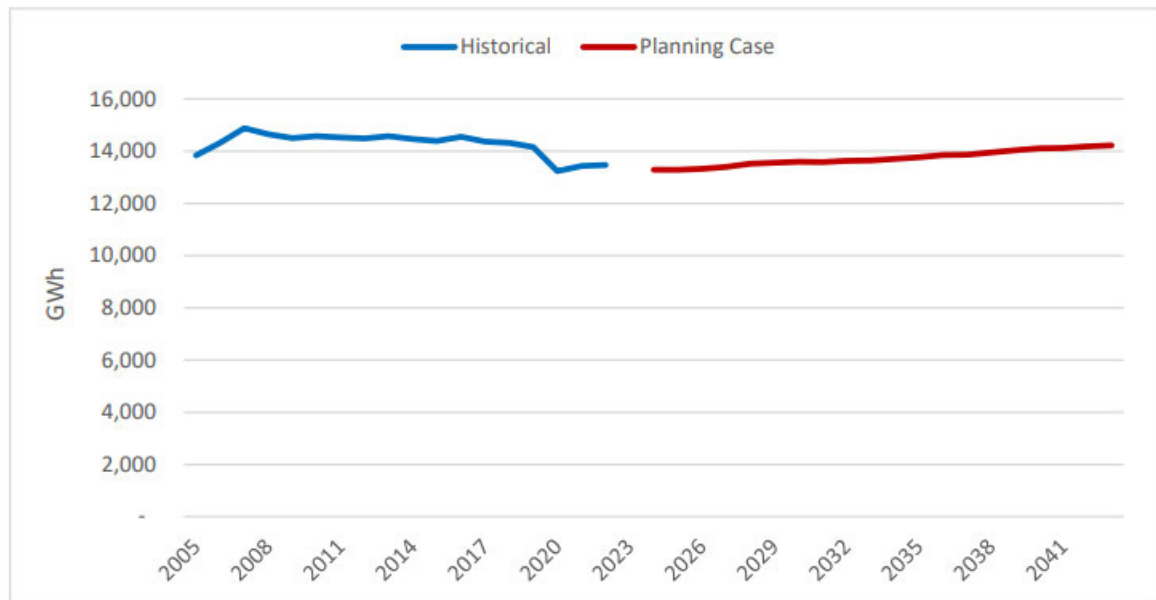
Below is the graph presented in the 2023 IRP report showing the historical and projected commercial sales growth.

¹⁵ *Ibid.*, p 35.

¹⁶ *Ibid.*

¹⁷ *Ibid.*

Figure 3.17: Planning Case Forecast of Commercial Class Energy Sales



Finally, the industrial class analysis in the 2023 IRP showed a slightly different picture: “Between 2009 and 2022, Ameren Missouri’s industrial sales declined at a compound annual rate of 0.9%.”¹⁸ For the industrial class the “planning case forecast calls for industrial sales growth at a compound annual rate of 1.3% between 2024 and 2043”¹⁹. The report notes after this that “While the overall industrial forecast is directionally positive after the long-term industrial sales decline that has been experienced in the recent years, expected growth without electrification is still flat. In fact, the forecast does not anticipate that the industrial sales will reach pre-recession levels at all during the planning horizon without efficient electrification.”²⁰

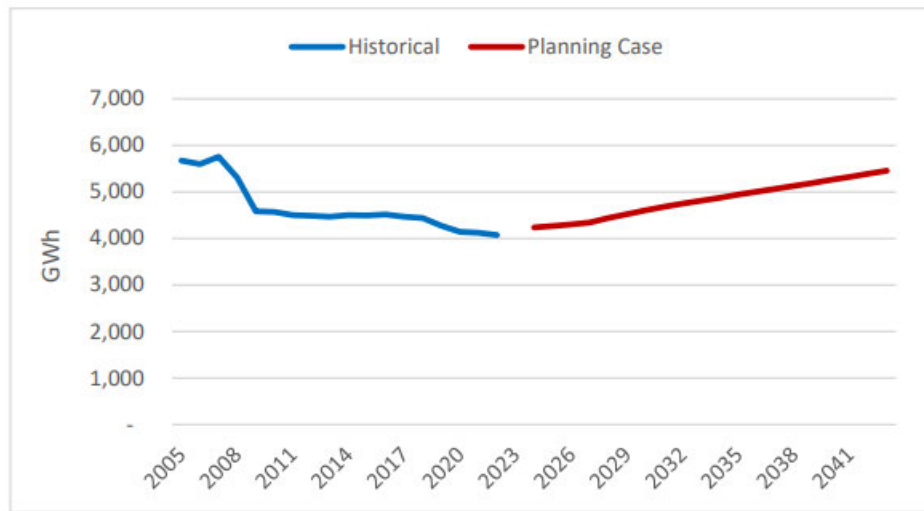
Below is the graph presented in the 2023 IRP report showing the historical and projected growth of industrial sales.

¹⁸ *Ibid.*, p 36.

¹⁹ *Ibid.*

²⁰ 2023 IRP Vol. 3. Load Analysis and Forecasting, EO-2024-0020, pp 36-37, emphasis added.

Figure 3.18: Planning Case Forecast of Industrial Class Energy Sales



Q. Has the Company changed its projected growth for the above classes since the 2023 IRP?

A. It has not. In both Case No. EO-2025-0123 and Case No. EO-2025-0235 (an IRP annual update and a change to a preferred resource plan (“PRP”), respectively) the Company discussed a change in its forecasted load growth as a result of expected large load customers. In the IRP annual update, Case No. EO-2025-0123, the Company stated that the inclusion of large load customer growth in its prior IRP was likely an underestimate in light of its then-current projections. In the change to the PRP, Case No. EO-2025-0235, the Company updated its expectations for the expected large load based on more certain data and concluded that there needed to be a change in the previously selected PRP. The new projection in each of these cases was that there would be a new class of large load customers, different from the residential, commercial, and industrial classes, and that the new load from said customers would be very significant (hence the name of the new customer class).

1 There was no mention of an increase on the same scale in the residential,
2 commercial, or industrial classes. The Company has not made relevant,
3 significant changes to the load projections of these classes since the 2023 IRP.

4 **Q. Mr. Michels' direct testimony says that one of his "key conclusions is**
5 **that the Tom Sawyer and Ringer Projects are necessary to meet the**
6 **energy needs of new and existing customers."**²¹ **Do you agree that these**
7 **solar projects are needed to meet the energy needs of existing**
8 **customers?**

9 A. No, I do not agree. The Company has claimed in case after case that the
10 generation buildout they have been undertaking from about 2022 onward is the
11 result of an acceleration of the already planned generation for the future. In
12 other words, they claim they are speeding up their planned buildout, so it is just
13 what they were already going to do. Thus, they argue, this generation is for
14 existing customers. But, as I discussed above, looking at the Company's
15 projections of customer load growth, the energy needs of existing customers
16 would not need the two solar projects proposed in this case at this time. The
17 energy needs of existing customers would be met by existing and recently
18 approved generation²². Furthermore, the Company's projections about energy
19 and capacity needs depend heavily on assumptions about the retirement of the
20 Sioux and Labadie coal plants that should be doubtful given the amount of
21 projected large load discussed by the Company. The Federal Department of
22 Energy has also been issuing orders and guidance to keep coal plants open for

²¹ Matt Michels, Direct Testimony, Case No. EA-2026-0183, p 28.

²² These projects are the Castle Bluff gas plant being built at the former site of the Meramec coal facility (Case No. EA-2024-0237), the many solar projects (Case Nos. EA-2022-0244 and EA-2023-0286). The Castle Bluff gas plant is 800 MW of nameplate capacity. The solar projects approved in Case Nos. EA-2022-0244 and EA-2023-0286 will supply 900 MW_{AC} of capacity. Totaled, these facilities will add a nameplate capacity of 1,700 MW to the existing generating fleet.

1 grid reliability and to aid in coal plant development, further throwing doubt on
2 the idea that the Company's coal plants will be closed in the next 10-20 years²³.

3 Looking specifically at Ameren Missouri's past IRPs, in its 2014 IRP, the
4 Company said about the retirement of Meramec that it "can be carried out
5 without creating a need for new generating capacity, primarily as a result of the
6 continuation of our cost-effective customer energy efficiency programs."²⁴ On the
7 same page as this discussion, it includes a capacity projection graph from 2015-
8 2035, which shows no shortage at all of capacity. Similarly, in the 2017 IRP, the
9 Company showed a capacity surplus until 2045, remarking that its "robust fleet
10 of generating resources is expected to continue meeting customers' needs under
11 its baseload forecast over the next 20 years, even as over half of the existing coal-
12 fired generation is retired"²⁵. Then, in the Company's 2020 IRP, it shows the
13 same capacity surplus through 2040²⁶. The Company's planned future
14 generation in these past IRPs was largely a result of its energy transition goals,
15 and the "acceleration" of said generation is inexplicable without the existence of
16 the imminent new large load from data centers. See Dr. Geoff Marke's rebuttal
17 testimony in this case for more discussion on the amount of new generation being
18 proposed by the Company and the associated costs of said generation.

19 So, no, I do not agree that the solar facilities that are being requested now are
20 needed for existing customers. I do believe that the solar projects are being
21 acquired for the coming large load customer demand because solar generation is
22 likely the only type of generation available at this time due to a constrained

²³ "FACT SHEET: The Energy Department is Unleashing Beautiful, Clean Coal", Department of Energy, June 4, 2026, <https://www.energy.gov/articles/fact-sheet-energy-department-unleashing-beautiful-clean-coal>. "Trump Administration Keeps Coal Plant Open to Ensure Affordable, Reliable and Secure Power in the Northwest", Department of Energy, March 16, 2026, <https://www.energy.gov/articles/trump-administration-keeps-coal-plant-open-ensure-affordable-reliable-and-secure-power>.

²⁴ Ameren Missouri 2014 IRP Vol. 1 Executive Summary, Case No. EO-2015-0084, p 5.

²⁵ Ameren Missouri 2017 IRP Vol. 1 Executive Summary, Case No. EO-2018-0038, pp 6-7.

²⁶ Ameren Missouri 2020 IRP Vol. 1 Executive Summary, Case No. EO-2021-0021, p 12.

1 supply chain and intense demand for natural gas units. Existing customers'
2 needs are met by the generation that is already available to them in the
3 Company's existing generating fleet and to the extent that it is not, by some of
4 the recently approved and underway projects.

5 **Q. Has the state of Missouri signaled a commitment to ensuring that large**
6 **load customers building data centers cover the costs of the generation**
7 **that is built for them?**

8 A. Yes. Governor Mike Kehoe has signed, along with the governors of other states,
9 the White House's Ratepayer Pledge, which states that "[a]s that infrastructure
10 grows and the related electricity demand increases, the American people should
11 not be footing the bill for the benefit of private companies. Instead, the data
12 center boom should be leveraged to address affordability and benefit all
13 American households and businesses."²⁷ The pledge continues in more explicit
14 language that AI companies should "build, bring, or buy all of the energy needed
15 for building and operating data centers, paying the full cost of their energy and
16 infrastructure, no matter what."²⁸

17 **Q. What are you proposing regarding the costs of these requested plants?**

18 A. My proposal is that the Company should declare that, when the costs of these
19 plants are recovered in rates, they will be totally allocated to the large load
20 customer class. Absent that, the Company can refuse to say anything on the
21 point and I will make the same argument in a future rate recovery case. The
22 OPC may also make cost disallowances in a future rate recovery case if the tax
23 credits for the three BESS and the two solar facilities are not received. The
24 Company claims that it has met the requirements of the IRS physical work test

²⁷ Ryan Shiner, "Kehoe among list of governors who sign 'ratepayer pledge' on data centers", KQTV, July 24, 2026, <https://www.kq2.com/news/2026/07/24/kehoe-among-list-of-governors-who-sign-ratepayer-pledge-on-data-centers/>.

²⁸ *Ibid.*

1 by entering into legally binding contracts for the off-site manufacture of
2 significant, custom components that are unique for each specific battery or solar
3 facility. The Company claims that the IRS physical work test has been satisfied
4 before the deadline in the One Big Beautiful Bill Act (“OBBBA”). If these turn
5 out to be untrue or the tax credits are not received, the OPC may request cost
6 disallowances equal to the value of the tax credits.

7 **III. SOLAR GENERATION AND BATTERY ENERGY STORAGE SYSTEMS**
8 **(“BESS”)**

9 **Q. Company witness Matt Michels says in his direct testimony that there**
10 **is “needed solar generation”. What do you make of this?**

11 A. Mr. Michels says this in a discussion of the tax credits that the Company expects
12 to receive for the solar facilities. I do not believe that the Company is attempting
13 to add solar generation at this time because solar is needed over other generation
14 sources but is adding solar generation because (1) it is the easiest type of
15 generation to procure at this time, and (2) because in prior IRPs, the model used
16 to make building decisions chose solar because there was an assumption that it
17 was the lowest cost generating resource type.

18 I believe that the assumption that solar is one of the lowest cost options for
19 generation has obviously changed, and the true costs of solar are now being
20 confronted. The total combined capacity received in MISO for the two solar
21 projects in this CCN is 19.2 MW for summer, 11.9 MW for fall, 2.4 MW for winter,
22 and 10.7 MW for spring. The total, risk-adjusted combined cost for the two solar
23 projects is ***_____***. Even with the Company’s expected federal tax
24 credits of 30% per facility, the cost of the two solar projects is still
25 ***_____***, and these tax credits are not absolutely guaranteed. So, if
26 we assume the total cost of the solar projects is the risk-adjusted cost less the

1 federal tax credit impacts, it is still an exorbitant cost for the seasonal accredited
2 capacity for these projects.

3 The cost of these two solar projects is exorbitant even considering just the
4 nameplate capacity alone, and is frankly outrageous when considering the
5 accredited capacity from MISO. The addition of these solar facilities at this time,
6 and for this cost, must be solely due to the upcoming large load demand. Were
7 the Company not expecting such a sharp increase in load in the very near future,
8 it would not purchase so little energy and capacity for such high cost.

9 Further, I do not believe that the addition of expensive and low-accredited
10 capacity solar is simply due to the IRP modeling results. I do not believe this
11 because Mr. Michels has emphasized in his direct testimony in this case in a
12 discussion of the planned generation additions, that “[r]enewable resource
13 additions are a particularly important consideration in attracting new LLCs,
14 such as data centers.”²⁹ If expensive and low-accredited capacity solar facilities
15 are being prioritized at this time because of the Company’s interest in attracting
16 new LLC customers and more data centers in its service territory, then the costs
17 of these plants are solely caused by said customers and should be borne by them
18 completely.

19 **Q. What is your response to the Company’s position that the solar**
20 **generation is needed because the increase in load from LLCs will result**
21 **in more renewable generation for RES compliance?**

22 **A.** I agree that the increased load will mean the Company must build more
23 renewable generation to be RES compliant. However, this does not change my
24 position that the costs of the solar facilities in this case would be directly caused
25 by the LLCs, even considered as needed for RES compliance. This is because the
26 increase in load that directly caused the need for more renewable generation is

²⁹ Matt Michels, Direct Testimony, Case No. EA-2026-0183, p 7.

1 caused by the addition of the LLC customers. Thus, I would say that the LLCs
2 should still completely bear the costs of the solar and BESS facilities requested
3 in this case.

4 **Q. Do you have any recommendations that would allow the Commission to**
5 **remedy the problem of low accredited capacity for the requested solar**
6 **facilities?**

7 A. Yes. I recommend that the Commission order the Company to site the Castle
8 Bluff BESS at the Ringer Solar Project, and I explain why in what follows.
9 Company witness Mr. Andrew Meyer has given the MISO forecasted capacity
10 accreditation values according to MISO's new Direct Loss of Load ("DLOL")
11 framework³⁰. Because the BESS projects have a lowest seasonal accredited
12 capacity of 79.5%, and the solar facilities have a highest accredited seasonal
13 capacity of only 4.8%, it would be prudent to co-locate BESS with any new solar
14 facilities built or acquired. Applying the summer solar DLOL class average to the
15 nameplate capacity of the Ringer project, we get 10.8 MW of accredited capacity.
16 Doing the same for the winter solar DLOL class average of 0.6%, we get a total
17 accredited capacity for the Ringer project of 1.35 MW. The accredited capacity
18 for the fall and spring seasons falls roughly in between the summer and winter.

19 MISO has recommended (but not yet implemented) a resource siting selection
20 option³¹ under its new seasonal capacity accreditation methods that co-location
21 of resources at the same commercial pricing node can improve the overall
22 capacity accreditation of the aggregate resources. Under this option, a market
23 participant can choose to prioritize one of the resources for the aggregate capacity
24 to favorably influence the seasonal accredited capacity of the aggregate resource.

³⁰ Andrew M. Meyer, Direct Testimony, Case No. EA-2026-0183, p 7.

³¹ See schedules JS-R-2 and JS-R-3 for a brief explanation of MISO's proposal for co-located resources in its direct loss of load ("DLOL") accreditation calculations.

1 In addition, but separate from the MISO capacity accreditation, any solar facility
2 with an attached BESS would be capable of discharging the stored energy when
3 it is needed but less likely to be immediately available from the solar facility
4 itself. And, in the event of the solar facility losing load due to inverter failure,
5 voltage stability problems, etc., the battery being a part of the same facility would
6 avoid total loss of load at that point on the system. These would all be benefits
7 for the solar facilities both in terms of the accredited capacity at their node and
8 the availability of dispatchable energy for the Company.

9 If the Commission ordered a new proposal for siting the Castle Bluff BESS
10 project at the Ringer Solar site, then the Company and its customers would
11 benefit from greater reliability, and likely from increased future capacity.

12 **Q. What do you say in response to the Company's reasoning that it is**
13 **attempting to secure interconnection rights at the Castle Bluff site?**

14 A. Retaining interconnection rights at the Castle Bluff site is important, but should
15 not be done at the expense of supporting new solar facilities with co-located
16 BESS. I believe that the generation added to the Castle Bluff site in order to
17 maintain the interconnection rights should be the same as that already approved
18 for the site: natural gas generating units.

19 **Q. Is the Company able to acquire and build a natural gas turbine on the**
20 **Castle Bluff site in order to retain the interconnection rights?**

21 A. I do not know if the Company can do so or not, but, from my review of the natural
22 gas turbine market and examples of turbines acquired or built this year, and
23 assuming 12%-15% allowance for funds used during construction ("AFUDC"), the
24 acquisition of a natural gas turbine with around 95 MW of nameplate capacity,
25 even adding on interconnection study costs, should be around the cost of the base
26 case estimate for the Castle Bluff BESS. Even assuming a slightly greater
27 capital cost, because an additional gas unit would generate energy where a BESS

1 does not, the additional gas unit should be a more favorable option to use the
2 remaining interconnection rights.

3 **Q. Does this conclude your rebuttal testimony?**

4 **A. Yes.**

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

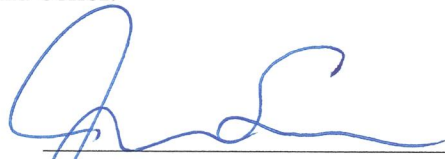
In the Matter of the Application of Union Electric	)	
Company d/b/a Ameren Missouri for Permission	)	
and Approval and Certificates of Public	)	<u>Case No. EA-2026-0183</u>
Convenience and Necessity Authorizing it to	)	
Construct Renewable Generation Facilities and	)	
Battery Energy Storage Systems	)	

AFFIDAVIT OF JORDAN SEAVER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

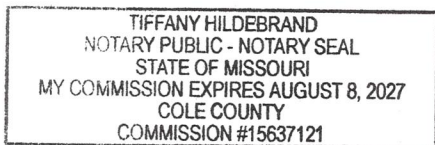
Jordan Seaver, of lawful age and being first duly sworn, deposes and states:

1. My name is Jordan Seaver. I am a Policy Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

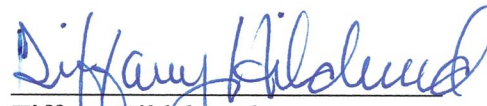


Jordan Seaver
Policy Analyst

Subscribed and sworn to me this 4th day of August 2026.



My Commission expires August 8, 2027.



Tiffany Hildebrand
Notary Public