

Exhibit No.:

Issues: Policy

Witness: Jessica Polk Sentell

Sponsoring Party: Renew Missouri
Advocates

Type of Exhibit: Rebuttal Testimony

Case No.: EA-2026-0183

Testimony Filed: August 11, 2026

MISSOURI PUBLIC SERVICE COMMISSION

EA-2026-0183

REBUTTAL TESTIMONY

OF

JESSICA POLK SENTELL

ON BEHALF OF

RENEW MISSOURI ADVOCATES

August 11, 2026

1
2 **I. INTRODUCTION**

3 **Q: Please state your name, title, and business address.**

4 A: Jessica Polk Sentell, Director of Eastern Missouri and Policy Associate, Renew
5 Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), 501 Fay Street, Suite 206,
6 Columbia, MO 65201.

7 **Q: Please describe your current position, your education, and background.**

8 A: In my role as Director of Eastern Missouri and Policy Associate at Renew Missouri,
9 I, along with other Renew Missouri staff, have developed and offered educational materials
10 and programs on topics related to energy law and policy in Missouri, rural renewable siting
11 and county planning and zoning, rural broadband, local organizing and rural electric
12 cooperative engagement, and our year-end update covering state and federal rulemakings,
13 Public Service Commission (“PSC” or the “Commission”) cases, and other various energy
14 efficiency/renewable energy updates. Regarding my background and education, I have a
15 Masters of Public Administration and a Bachelor of Science in Political Science, both from
16 Missouri State University in Springfield, Missouri. Upon graduating with my master’s
17 degree, I was selected as a Presidential Management Fellow by the Office of the President
18 of the United States, Washington, D.C. As a Presidential Management Fellow, I spent over
19 three years working as a Program Analyst for the federal government. During my tenure, I
20 worked for the US Department of Defense, Joint Chiefs of Staff, National Military
21 Command Center, Pakistan-Afghanistan Coordination Cell, Office of Governance &
22 Development; US Department of State, Office of the Special Representative to Muslim
23 Communities; and US Department of Justice, Drug Enforcement Administration,
24 International Operations, Special Projects Branch. I am also a certified teacher in the State

1 of Missouri and have a certificate in Culturally Responsive Teaching from Southeast
2 Missouri State University's Center for Teaching and Learning. Prior to beginning my
3 position at Renew Missouri, I spent six years teaching political science as a full-time
4 instructor at Southeast Missouri State University in Cape Girardeau, Missouri, six years as
5 a part-time adjunct instructor at Three Rivers College in Poplar Bluff, Missouri, and six
6 years as a full-time high school and dual credit teacher at Clearwater R-1 High School in
7 Piedmont, Missouri.

8 **Q: What work does Renew Missouri conduct in the field of energy policy?**

9 A: Renew Missouri is an advocacy group appearing before regulatory agencies such
10 as the Missouri Public Service Commission, the Kentucky Public Service Commission,
11 and the Kansas Corporation Commission in the role as expert witnesses on clean energy,
12 energy efficiency, and transmission development policy. Our work involves engaging as
13 intervenors on utility rate cases, applications for certificates of convenience and necessity
14 ("CCNs"), mergers and acquisitions, Accounting Authority Orders ("AAOs"), and energy
15 efficiency investment portfolios. Renew Missouri also routinely engages in workshops and
16 rulemaking by providing comments. We have also lent our expertise and knowledge on
17 legislative matters in Missouri and Kansas as well as the federal level on issues ranging
18 from energy efficiency investments to securitization of debts incurred from closing coal
19 plants to helping rural electric cooperatives obtain financing for clean energy projects.

20 **Q: Have you testified before any state utility commissions?**

21 A: Since joining Renew Missouri, I have participated in a number of PSC cases. For a
22 full list of case participation, please see Schedule JPS-1. Most recently, these included

1 Evergy and Ameren Missouri’s large load cases (EO-2025-0154 and ET-2024-0184), as
2 well as Ameren Missouri’s recent CCNs (EA-2025-0238 and EA-2025-0239).

3 **Q: Could you please briefly summarize your testimony as well as your**
4 **recommendations?**

5 A: The purpose of my testimony is to support the addition of 400 MW solar and 545
6 MW battery energy storage system (“BESS”) for Ameren Missouri (“Ameren” or the
7 “Company”) and explain the benefits to such a project. I recommend the Commission
8 approve construction for the Company.

9 II. SUPPORT OF SOLAR PROJECTS

10 **Q: Why is Renew Missouri supporting these solar projects?**

11 A: Renew Missouri advocates for energy efficiency and renewable energy policy. As
12 a state-wide advocate, Renew Missouri has a general interest in Ameren Missouri
13 increasing solar energy generation and battery storage when it economically makes sense
14 for both the Company and its customers, as well as hastening the Company’s transition to
15 a clean energy future.¹ Collectively, these projects would add a significant amount (400
16 MW) of solar energy to Ameren’s generation portfolio.

17 **Q: Are there reasons specific to Ameren and this case to support these particular**
18 **projects?**

19 A: Yes, Renew Missouri echoes much of the direct testimony provided by the
20 Company, which explains the many benefits of this specific project. In Ameren’s 2025

¹Ameren is still targeting net-zero carbon emissions by 2045, see Integrated Resource Plan. 2025. Ameren Missouri. Accessed January 16, 2026, from [https://www.amereninvestors.com/corporate-governance/ameren-missouri-integrated-resource-plan/default.aspx#:~:text=Ameren%20Missouri's%20Integrated%20Resource%20Plan%20\(IRP\)%20includes,Analysis%20*%20Strategy%20Selection%20*%20Stakeholder%20Process](https://www.amereninvestors.com/corporate-governance/ameren-missouri-integrated-resource-plan/default.aspx#:~:text=Ameren%20Missouri's%20Integrated%20Resource%20Plan%20(IRP)%20includes,Analysis%20*%20Strategy%20Selection%20*%20Stakeholder%20Process)

1 Preferred Resource Plan Update, the Company stated its intention to add “another 1,700
2 MW [of solar] by the end of 2030.”² The application is for 400 MW of solar plus another
3 545 MW of battery storage. This project will provide the Company nearly 24% of the solar
4 generation needed to achieve that goal. Mr. Dixon and Mr. Wibbenmeyer also reference or
5 explain applicable tax credits that will apply, making the projects even more affordable,
6 expedient due to deadlines, and beneficial to all ratepayers.³

7 Furthermore, Mr. Dixon stated Ameren has seen a surge in demand from large load
8 customers.”⁴ In short, Ameren needs more power, and they need it quickly to meet this
9 growing demand. In addition to needing the power, Mr. Michels also explained renewable
10 energy is needed for the Company to meet future Renewable Energy Standards (“RES”)
11 compliance.⁵

12 **Q: Are there other benefits to adding solar, specifically, as a generation source?**

13 A: Solar is also an economically expedient choice to meet this growing demand.
14 Lazard said in their latest report. “At this point, battery storage systems, solar arrays and
15 wind farms are faster and cheaper to build per kilowatt of capacity than anything else.”⁶
16 Mr. Michels also highlights “renewable energy resources...have no on-going fuel costs

²2025 Change in Preferred Plan. 2025 February 28. Ameren Missouri. p. 2.
https://s21.q4cdn.com/448935352/files/doc_downloads/2025/03/25-02-28-2025-Change-in-Preferred-Plan-Report-Public.pdf

³ *Direct Testimony of Robert B. Dixon* (“Dixon Direct”), p. 10, *Direct Testimony of Scott Wibbenmeyer*, p. 26-27, 42-44, 55-56.

⁴ Dixon Direct, p. 11-14.

⁵ *Direct Testimony of Mat Michaels* (“Michaels Direct”), p. 32-33.

⁶ Stock, K., Chediak, M., & Saul, J. (2025, December 4). Soyou want an AI boom. Bloomberg Newsletter: GreenDaily. Retrieved December 4, 2025, from www.bloomberg.com/news/newsletters/2025-12-04/how-trump-s-renewables-roadblocks-can-stall-the-ai-boom?cmpid=BBD120425_GREENDAILY&utm_medium=email&utm_source=newsletter&utm_term=251204&utm_campaign=greendaily

1 associated with the production of energy. Solar resources...play a key role in that
2 transition.”⁷

3 Finally, as determined in Ameren’s and Evergy Missouri Metro/Evergy Missouri West’s
4 large load cases and repeated with Mr. Michel’s reference to their sustainability goals, there
5 is widespread demand for clean energy, specifically, from large-scale industrial and
6 commercial customers.⁸ Adding additional renewable capacity shows large-load customers
7 that Ameren Missouri is actively trying to meet their needs, which could potentially draw
8 more large-load customers to the service territory. This, in turn, would stimulate economic
9 development, investment, and growth in the State by creating new jobs and opportunities.
10 Mr. Michels also states, “it is important to replace the Company's fleet as aging coal-fired
11 energy centers retire, ensuring reliability, maintaining affordability, and addressing risks
12 regarding the over-reliance on fossil fuels, including exposure to future environmental
13 regulations....While potential wind projects can also be attractive for providing additional
14 energy generation, solar projects have proven to pose fewer implementation challenges
15 relative to wind projects and provide energy generation during summer peak times.”⁹ Thus,
16 again, solar fits the Company’s needs.

⁷ Michels Direct, p. 28.

⁸As Mr. Dixon testified in ET-2025-0184 (p. 11) *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of New and Modified Tariffs for Service to Large Load Customers*, “large customers strongly desire to be served by a utility whose power supply is of course reliable but that also reflects an appropriate and significant proportion of energy from clean energy resources. In fact, **many of these customers have goals to be served by 100% carbon free energy in the not-too-distant future**” (emphasis added).

Mr. Steven Wills, EO-2025-0154, *In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariffs Related to Service of Large Loads*, testimony in front of the Missouri Public Service Commission. October 2025.

Michels Direct, p. 24.

⁹ Michels Direct, p. 24-25.

Besides adding clean capacity, increased clean energy generation will reduce greenhouse gas emissions and thus improve conditions for better health of Missourians as well.¹⁰

Q: You mentioned potentially creating economic opportunities for the State. Will there be local economic benefits due to the projects?

A: Yes. Local jobs will be created, especially during construction. Furthermore, local businesses in the surrounding area will indirectly benefit due to increased business and activity in the area. Finally, as with all siting projects, the county government will benefit from property taxes or payments in lieu of taxes over the lifetime of the facility. Renew Missouri conducted a survey of eleven solar projects across the State. On average, each county government will receive \$677,606 each year throughout the life of the projects, either in property taxes or payments in lieu of taxes. Much of this will directly benefit local schools (an average of \$472,151 per project per year), emergency programs, and other county initiatives.

III. SUPPORT OF BESS

Q: Why is Renew Missouri supporting the BESS projects?

A: BESS is intended to provide flexible capacity for new demand, helping to meet peak loads with clean energy and balance the variability of other clean energy from wind and solar. Indeed, Ameren explains that the expanded storage is driven by the significant new load additions in its service territory and a reduction in expected demand savings from

¹⁰ <https://moenvironment.org/blog/survey-shows-missouri-voters-support-state-plan-to-cut-carbon-pollution/>
<https://www.kbia.org/missouri-news/2024-04-26/new-epa-standards-to-protect-health-will-force-missouri-power-plants-to-reduce-emissions>
<https://dnr.mo.gov/air/get-involved/help-improve-air-quality>
<https://www.nrdc.org/sites/default/files/CPP-Missouri-Compliance-IB.pdf>
<https://www.epa.gov/ks/region-7-air-quality-program>
<https://climate.nasa.gov/news/3134/reducing-emissions-to-lessen-climate-change-would-yield-dramatic-health-benefits-by-2030/>
<https://pmc.ncbi.nlm.nih.gov/articles/PMC4953604/>

1 scaled-back efficiency programs.¹¹ Renew Missouri applauds Ameren’s recognition of
2 battery storage as a critical resource in developing a balanced supply-side portfolio to meet
3 customer needs in a reliable and resilient manner and its inclusion of BESS on an
4 accelerated timetable.

5 **Q: Does BESS make financial sense compared to other forms of generation or**
6 **dispatchable resources?**

7 A: Yes. While Renew Missouri did not complete our own financial analysis, general
8 knowledge and information available about the energy sector industry clearly shows
9 “batteries are among the cheapest and quickest ways to get more capacity onto the grid.”¹²
10 This is why other states have added exceptional amounts of BESS in the last couple of
11 years. In some instances, BESS has “displac[ed] some natural-gas use” and helped “stave
12 off” grid emergencies.¹³ Furthermore, as pointed out by Mr. Meyer, they can be charged
13 when market prices are low and discharged during peak system conditions, and this can be
14 done more than once a day.¹⁴ “Battery storage projects will [also] have tax credits available

¹¹ *Direct Testimony of Matt R. Michels*, p. 4.

In the Matter of Union Electric Company d/b/a Ameren Missouri’s Notice of a Change in its Preferred Resource Plan Case No. EO-2025-0235 *Preferred Resource Plan Change 2025*,
In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of New and Modified Tariffs for Service to Large Load Customers, Case No. ET-2025-0184, Ex. 6, *Direct Testimony of Matt R. Michels*, p. 3.

¹²McCarthy, D. (2025, October 31). *Chart: Batteries are set to surge onto the US grid*. Canary Media. Retrieved December 4, 2025, from <https://www.canarymedia.com/articles/batteries/us-energy-storage-growth-2030-bloombergnef>

Stock, K., Chediak, M., & Saul, J. (2025, December 4). *Soyou want an AI boom*. Bloomberg Newsletter: GreenDaily. Retrieved December 4, 2025, from www.bloomberg.com/news/newsletters/2025-12-04/how-trump-s-renewables-roadblocks-can-stall-the-ai-boom?cmpid=BBD120425_GREENDAILY&utm_medium=email&utm_source=newsletter&utm_term=251204&utm_campaign=greendaily

¹³ *Id.*

¹⁴ *Direct Testimony of Andrew Meyer*, p. 10.

1 through 2033.”¹⁵ Finally, as reported in EA-2025-0238 and echoed in this case, Ameren’s
2 own analyses by Astrapē Consulting and internally at Ameren, show “BESS up to 1,500-
3 2,000 MW is more economic relative to additional [natural gas simple cycle] above that
4 included in the 2025 [preferred resource plan].”¹⁶

5 CONCLUSION

6 **Q: Please summarize your testimony for the Commission.**

7 A: Renew Missouri recommends the Commission approve Ameren Missouri’s CCN
8 for the solar and BESS projects.

9 **Q: Does this conclude your testimony?**

10 A: Yes.
11

¹⁵ Walton, R., & DiGangi, D. (2025, August 27). *US utility-scale storage outlook ticks upward post-OBBA*. Utility Dive. Retrieved December 4, 2025, from <https://www.utilitydive.com/news/EIA-utility-scale-storage-outlook-ticks-upward-post-obbbba/758710/>
Wood Mackenzie Power & Renewables & American Clean Power Association. (2025, September). *US Energy Storage Monitor* [Q3 2025]. Wood Mackenzie Reports. Retrieved November, 2025, from https://go.woodmac.com/l/131501/2025-09-25/34tzgr/131501/1758833792fvVm5YRQ/US_ESM_Q3_2025_ES_PR.pdf

¹⁶Direct Testimony of Matt R. Michels, p. 20.

**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	)	
Certificate of Public Convenience and	)	<u>File No. EA-2026-0183</u>
Necessity Authorizing it to Construct	)	
Renewable Generation Facilities and	)	
Battery Energy Storage Systems	)	

AFFIDAVIT OF JESSICA POLK SENTELL

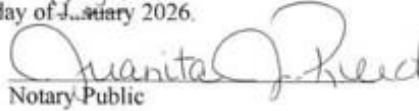
STATE OF MISSOURI	)	
	)	ss
COUNTY OF WAYNE	)	

COMES NOW Jessica Polk Sentell, and on her oath states that she is of sound mind and lawful age; that she prepared the foregoing Rebuttal Testimony; and that the same is true and correct to the best of her knowledge and belief.

Further the Affiant sayeth not.


Jessica Polk Sentell

Subscribed and sworn before me this ^{August} 8th day of ~~January~~ 2026.


Notary Public

My Commission expires: Feb 16 2030

JUANITA J REED Notary Public - Notary Seal STATE OF MISSOURI Wayne County My Commission Expires: February 16, 2030 Commission # 11164681
