BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

NOTICE OF PUBLIC FILING OF ENVIRONMENTAL STUDIES FOR THE MILLCREEK BESS PROJECT AND INFORMATION REGARDING BATTERY ENERGY STORAGE SYSTEM FIRE SAFETY IN ADVANCE OF ADDITIONAL LOCAL PUBLIC HEARING SCHEDULED FOR AUGUST 26, 2026

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Company" or "Ameren Missouri," and for its notice of the public filing of environmental studies for the Millcreek Battery Energy Storage System ("BESS") Project and information regarding BESS fire safety in advance of the additional Local Public Hearing scheduled for August 26, 2026, states as follows:

1. On May 22, 2026, Ameren Missouri filed an application with the Missouri Public Service Commission ("Commission") seeking an order granting Certificates of Convenience and Necessity ("CCNs") for three BESS Projects, the Tom Sawyer Solar Project, the Ringer Solar Project, and the Quinn Switching Station (associated with the Millcreek BESS Project).

2. On July 8, 2026, the Commission set the procedural schedule for the above-captioned matter.

3. On July 14, 2026, the Commission issued its *Order Setting Local Public Hearings* for the matter, which was corrected slightly later that day.

4. In accordance with its *Order Setting Local Public Hearings*, four Local Public Hearings were held on July 28, 29, and 30.

5. On August 7, 2026, the Commission issued its *Order Setting Additional Local Public Hearing*, which set an additional Local Public Hearing in Lincoln County — where the proposed Millcreek BESS Project would be located if the CCN is granted for the Project — for 6:00 p.m. on August 26, 2026.

6. Based primarily on questions and comments raised during the July 28, 2026 Eolia Local Public Hearing, the July 29, 2026 Virtual Local Public Hearing, and subsequent communications received through multiple channels, Ameren Missouri recognizes that additional information about the Millcreek BESS Project may be beneficial for the Commission, the parties, local officials, emergency responders, and members of the public.[1] Specifically, the questions and comments at issue suggest two principal areas about which further public clarification may be useful in advance of the August 26, 2026 additional Local Public Hearing.[2]

First Area of Clarification: Environmental Studies Completed for the Millcreek BESS Project

7. Ameren Missouri used experienced consultants to complete environmental reviews for the Millcreek BESS Project. This includes a Phase I Environmental Site Assessment, a Waters Delineation Report, and drainage and flood-related (Hydrologic and Hydraulic) studies. These reviews help ensure the Project is being designed responsibly, with appropriate consideration for land, water, wildlife, and long-term site conditions. Findings from the reviews did not identify significant environmental barriers to development. Overall, the environmental reviews support

[1] The issues raised regarding the Millcreek BESS were not previously raised regarding the Big Hollow BESS facility, for which the Commission issued a certificate of public convenience and necessity ("CCN") earlier this year (in File No. EA-2025-0238) nor have they been raised regarding the other BESS facilities for which CCNs are sought in this case.

[2] Ameren Missouri intends for these points of clarification to be incorporated into one or more of its witnesses' Surrebuttal Testimony to be filed in this case.

moving the Project forward responsibly, with agency coordination and measures in place to protect environmental resources.

More specifically, the three environmental studies the Company contracted with consultants for the Millcreek BESS Project are attached and publicly available as Attachments A, B, and C.

a. Attachment A is a Phase 1 Environmental Site Assessment report completed by the Company's consultant Civil & Environmental Consultants, Inc. for the Millcreek BESS Project site. This report identified no "Recognized Environmental Conditions" or "RECs."

b. Attachment B is a Waters Delineation Report completed by the Company's consultant Civil & Environmental Consultants, Inc. for the Millcreek BESS Project. This report finds the water-related impacts are expected to be limited and are primarily associated with the project entrance road, where stream crossings may be needed. Ameren Missouri is coordinating with the U.S. Army Corps of Engineers so those crossings can be designed and permitted to avoid, minimize, or limit environmental impacts.

c. Attachment C is a Flood Study Report completed by the Company's consultant Kimley-Horn and Associates, Inc. for the Millcreek BESS Project. This report will be used to inform advanced project design.

d. Regarding potential endangered bats at the Millcreek BESS Project site (encountering endangered bats from Spring to Fall is common across much of Missouri), Ameren Missouri has coordinated with the U.S. Fish and Wildlife Service (“USFWS”) regarding potential endangered species in the area. Based

on those USFWS consultations, the only necessary steps related to endangered species at the project are to manage tree clearing necessary to construct the entrance road to the facility at times when endangered bats are not present. Ameren Missouri will follow the appropriate protocols to avoid impacting endangered bats.

<u>Second Area of Clarification</u>: BESS fire safety.

8. Today's utility-scale battery systems incorporate inherently safer[3] lithium iron phosphate ("LFP") chemistry, advanced monitoring systems, automatic safety controls, and built-in fire and explosion mitigation features to detect issues early, isolate affected equipment, and help prevent fires from spreading beyond a single battery unit. Ameren Missouri also takes a more conservative approach to battery container setbacks and unit spacing, going beyond manufacturer recommendations for safe operation, to further reduce the potential for heat from one unit affecting neighboring units or the surrounding area.

BESS are also required to pass rigorous testing demonstrating that they meet nationally recognized safety standards, including Underwriters Laboratories (UL) standard 9540 for the complete system, UL 1973 for battery systems, UL 1642 for individual lithium battery cells, UL 1741 for power conversion equipment, and UL 9540A for fire propagation testing. These standards exist to protect people and property by confirming that the system is properly designed, built, installed, and able to operate safely under normal but also under abnormal conditions.[4]

The testing to meet those UL standards is rigorous because it evaluates safety at multiple levels: the cell, module, battery unit, and full system. Tests include electrical stress, short circuit

[3] As contrasted with earlier lithium ion only technology.
[4] Tesla's website presents a summary of these standards at: https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/General/Compliance/SafetyStandardsLithiumIonElectrochemical/en-us/GUID-560D61B5-326B-486A-830C-AEEB0A15BE3A.html (accessed August 19, 2026).

and overcharge conditions, grounding and insulation checks, electromagnetic interference, mechanical impact and crush forces, moisture, corrosion, seismic vibration, high temperature exposure, and thermal runaway fire testing. To pass, the product must avoid unacceptable outcomes such as fire spread, explosion, electric shock, hazardous leakage, loss of protective controls, or unsafe operation.

Before an energy storage system can be installed, it must also comply with safety standards including National Fire Protection Association (NFPA) standard 855, which require rigorous testing, design reviews, and performance validation.

9. Furthermore, Ameren Missouri has met with and continues to meet with local fire departments and emergency responders about the Millcreek BESS Project. Emergency response planning and training are developed in coordination with local responders, so they have specific information before the facility begins operation. The Company's plans also include safety documentation, training, equipment reviews and visits for local responders, to help assure they have the knowledge and tools to respond to an emergency event. Current industry guidance for responding to a BESS fire is to monitor and contain the incident rather than actively fight the fire directly. This approach is intended to help protect responder safety, avoid placing unnecessary demands on local fire departments, and allow emergency personnel to manage the event using standard fire-service response equipment while maintaining a safe perimeter and protecting the surrounding community.

Preparing for emergencies is one part of a broader safety approach that includes battery technology selection, facility design, monitoring systems and ongoing coordination with local responders.

Conclusion

10. In addition to this *Notice*, Ameren Missouri has, concurrently with this filing, updated its Millcreek BESS Project webpage, https://www.ameren.com/reliability/generation/millcreek, with Attachments A, B, and C. The Millcreek BESS Project website contains Project details and a list of Frequently Asked Questions with answers.

11. The Company files this *Notice* to ensure that the Commission, intervenors, local officials, emergency responders, and members of the public have timely, accurate, and readily accessible information before the additional Local Public Hearing. By publicly filing the environmental studies completed for the Millcreek BESS Project and addressing the principal questions raised to date regarding environmental review and BESS fire safety, Ameren Missouri seeks to provide, accurate and fact-based information and reduce or eliminate misunderstandings or speculation about the Project, and demonstrate that the Project is being advanced with appropriate attention to environmental responsibility, nationally recognized safety standards, prudent system design, and coordination with local emergency-response personnel.

Respectfully submitted,

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ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on counsel for all parties of record via electronic mail on this 21st day of August, 2026.

/s/ Jermaine Grubbs