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|---------------------------------|---------------------------------|
| <i>Exhibit No.:</i>             | <i>General Info &amp; Misc.</i> |
| <i>Issue(s):</i>                | <i>Brodrick Niemeier</i>        |
| <i>Witness:</i>                 | <i>MoPSC Staff</i>              |
| <i>Sponsoring Party:</i>        | <i>Surrebuttal Testimony</i>    |
| <i>Type of Exhibit:</i>         | <i>EA-2026-0183</i>             |
| <i>Case No.:</i>                | <i>September 4, 2026</i>        |
| <i>Date Testimony Prepared:</i> |                                 |

# **MISSOURI PUBLIC SERVICE COMMISSION**

## **INDUSTRY ANALYSIS DIVISION**

### **ENGINEERING ANALYSIS DEPARTMENT**

#### **SURREBUTTAL TESTIMONY**

**OF**

**BRODRICK NIEMEIER**

**UNION ELECTRIC COMPANY,  
d/b/a AMEREN MISSOURI**

**CASE NO. EA-2026-0183**

**Jefferson City, Missouri  
September 2026**

1 **SURREBUTTAL TESTIMONY OF**

2 **BRODRICK NIEMEIER**

3 **UNION ELECTRIC COMPANY,**  
4 **d/b/a AMEREN MISSOURI**

5 **CASE NO. EA-2026-0183**

6 Q. Please state your name and place of business.

7 A. My name is Brodrick Niemeier and my business address is Missouri Public  
8 Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

9 Q. Are you the same Brodrick Niemeier that contributed to the Staff rebuttal  
10 report filed on August 11, 2026?

11 A. Yes I am.

12 Q. What is the purpose of your surrebuttal testimony?

13 A. Within Staff's rebuttal report, a meeting between Ameren Missouri and  
14 Staff was mentioned along with the fact that Staff might have additional in-service  
15 recommendations within Surrebuttal as a result of the meeting.<sup>1</sup>

16 **CAPACITY TEST MEETING**

17 Q. What was the topic of this meeting?

18 A. Within the Stipulation and Agreement for Case No. EA-2025-0238 was a  
19 condition that Ameren Missouri and Staff meet to discuss additional capacity tests  
20 for Battery Energy Storage Systems ("BESSs") before Ameren Missouri contracts its next

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<sup>1</sup> Staff Rebuttal Report, Page 104, Lines 3-10.

1 capacity test for a BESS project. A meeting was held on August 3, 2026, to satisfy  
2 this requirement.

3 Q. What were the results of this meeting?

4 A. While no new in-service criteria are being recommended by Staff as a result  
5 of this meeting, Ameren Missouri did state that it would be open to providing data  
6 concerning the BESS systems as an alternative. Therefore, I recommend the Commission  
7 condition approval of this CCN with the following:

- 8 • Ameren Missouri shall record the amount of time a BESS system takes to  
9 discharge from 100% capacity to less than 5% capacity at two discharge  
10 rates between 25% and 75% of the system's maximum discharge rate as  
11 well as how much energy was discharged during that time.
- 12 • The specific discharge rates may be selected by Ameren Missouri so long  
13 as they are within the above range and not within 10% of each other.
- 14 • This information shall be provided to Staff within 90 of each BESS project  
15 entering into service.

16 Q. What does Staff plan to use this data for?

17 A. Based on the amount of time each system takes to discharge, and the total  
18 amount of energy discharged during that time, Staff can calculate a discharge efficiency  
19 for three discharge rates, one at maximum capacity and two at Ameren Missouri's  
20 selected capacities. The discharge efficiencies can then be used to better model the  
21 BESS systems in future rate cases.

22 Q. Why should Ameren Missouri select the discharge rates for the datasets?

1           A.     Staff does not want the data collection to be overly burdensome, and a  
2 range should allow Ameren Missouri to collect the data during a time that is not  
3 economically detrimental<sup>2</sup> to operate the BESS units. Additionally, Ameren Missouri  
4 may find that it is optimal to discharge at a rate that Staff did not specify if set discharge  
5 rates were stated. If this were the case, Ameren Missouri being able to provide data on  
6 the optimal discharge rate would be better than Staff estimating that dataset by using the  
7 data that Ameren Missouri was required to provide. Finally, the requirement that the  
8 discharge rates should not be within 10% of each other ensures that Staff has a wide  
9 range of data without specifying two exact discharge rates.

10          Q.     Does this conclude your surrebuttal testimony?

11          A.     Yes it does.

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<sup>2</sup> Here economically detrimental refers to a time when operating a BESS would cost Ameren Missouri more than it made, such as discharging the BESS when the energy price was lower than when the BESS was charged.

**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             | ) | Case No. EA-2026-0183 |
| Certificates of Public Convenience and      | ) |                       |
| Necessity Authorizing it to Construct       | ) |                       |
| Renewable Generation Facilities and Battery | ) |                       |
| Energy Storage Systems                      | ) |                       |

**AFFIDAVIT OF BRODRICK NIEMEIER**

|                   |   |     |
|-------------------|---|-----|
| STATE OF MISSOURI | ) |     |
|                   | ) | ss. |
| COUNTY OF COLE    | ) |     |

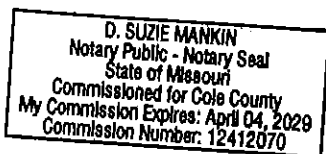
**COMES NOW BRODRICK NIEMEIER** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Brodrick Niemeier*; and that the same is true and correct according to his best knowledge and belief.

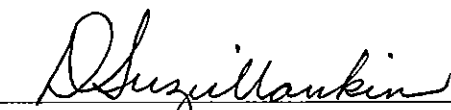
Further the Affiant sayeth not.

  
**BRODRICK NIEMEIER**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1<sup>st</sup> day of September 2026.



  
Notary Public