

**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 a Certificate	)	
of Convenience and Necessity to Construct, Own,	)	<u>File No. EA-2027-0009</u>
Operate and Maintain a Transmission Substation in	)	
Boone County, Missouri.	)	

APPLICATION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), pursuant to Section 393.170.1, RSMo., 20 CSR 4240-2.060, and 20 CSR 4240-20.045, and hereby submits its *Application* for a Certificate of Convenience and Necessity ("CCN") to construct, install, own, operate, maintain, and otherwise control a new 161 kV substation ("Katy 161 kV substation") and split the existing 161 kV Loy Martin-Overton-3 transmission line ("LYMT-OVRT-3 transmission line") into two lines routed in and out of the new Katy 161 kV substation. In support of its *Application*, Ameren Missouri states as follows:

APPLICANT

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. Ameren Missouri is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. Ameren Missouri has previously submitted to the Commission a certified copy of its Articles of Incorporation (File No. EA-87-105), its Fictitious Name Registration with the Missouri Secretary of State (File No. EA-2024-0237), and its Certificate of Corporate Good Standing (File No. EO-2027-0004), all of which are incorporated herein by reference in accordance with 20 CSR 4240-2.060(1)(G).

2. Filings, notices, orders, and other correspondence and communications concerning this *Application* should be addressed to the undersigned counsel and to:

Steve Wills
Sr. Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
swills@ameren.com

3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court involving customer service or rates (other than matters pending before this Commission), which action, judgment, or decision has occurred within three years of the date of this *Application*.

4. Ameren Missouri has no overdue annual reports or assessment fees.

5. A 60-day notice with respect to the authority sought herein was filed on July 9, 2026, and the above-captioned file number was assigned.

**THE NEW SUBSTATION, TRANSMISSION LINE FACILITIES, AND
RECONFIGURATION OF THE EXISTING SUBSTATION**

6. Ameren Missouri currently owns and operates the LYMT-OVRT-3 transmission line. Columbia Water and Light's ("CWLD") McBaine transmission tap connects to the LYMT-OVRT-3 transmission line and goes to Associated Electric Cooperative Inc.'s ("AECI") McBaine substation. The Katy 161 kV substation is part of the Midcontinent Independent System Operator's ("MISO") Transmission Expansion Plan ("MTEP") and identified as Project ID 22791. Further, the proposed Katy 161 kV substation will be located in central Missouri, and it is expected that there will be future generation interconnection requests in this area in the near-to intermediate-term.

7. To enhance reliability for years to come and provide flexibility to accommodate future generation interconnections, Ameren Missouri plans to remove the McBaine tap on the LYMT-OVRT-3 transmission line and construct the Katy 161 kV substation. The Katy 161 kV substation will be constructed in a three (3) position ring bus configuration, with space for three (3) additional positions available for future expansion. The existing LYMT-OVRT-3 transmission line will be rerouted in and out of the Katy 161 kV substation, thereby segmenting the line into two new transmission lines called Loy Martin-Katy-7429 and Katy-Overton-7148.

8. Currently, an outage of the LYMT-OVRT-3 transmission line results in an outage of the CWLD McBaine tap to the AECI McBaine substation. By segmenting the line, the Katy 161 kV substation ring bus would eliminate the potential for a line fault anywhere along the line between Loy Martin and Overton to interrupt electricity supply to the line going to the AECI McBaine substation. For a fault on either the Loy Martin-Katy-7429 transmission line or the Katy-Overton-7148 transmission line, the affected section could be isolated while the unfaulted section would remain energized to the Katy 161 kV substation. The ring bus arrangement also avoids the possibility for a bus fault to result in an outage to more than one element at the substation, increasing the overall reliability and operability of the transmission system in this area.

9. The items described above in paragraph 7 (known herein as "new facilities") are located outside of Ameren Missouri's service territory, meaning the new facilities constitute an asset within the meaning of 20 CSR 4240-20.045(1)(A)(2).

10. The new facilities will be constructed upon land owned by Ameren Missouri.

11. The cost of the new facilities is estimated to be approximately **_____,** inclusive of the cost of engineering design, materials, construction, allowance for funds used during construction, applicable overheads and contingency.

REQUEST FOR A CCN

12. Ameren Missouri requests that it be granted a CCN to construct, own, operate and maintain the new facilities. As explained above, the new facilities will promote grid reliability by reducing the possibility of an outage of the entire length of line between Loy Martin and Overton, and therefore an outage of the line going to AECl's McBaine substation. Additionally, the ring bus configuration would eliminate the risk of a simultaneous outage of more than one element at the site.

13. The "Tartan Factors"¹ typically relied upon by the Commission in evaluating CCN requests support issuance of a CCN in this matter as follows:

- a. The operation and maintenance of the new facilities is needed for the reasons given above.
- b. The operation and maintenance of the new facilities is economically feasible for multiple reasons. First, as the Commission has recognized, since the new facilities are needed, economic feasibility generally turns on the company's ability to finance the new facilities. Ameren has the ability to finance the new facilities, as further addressed below. Second, as further addressed below, the new facilities' equipment and construction are being procured/performed in accordance with Ameren Missouri's procurement procedures and policies, including competitive bidding requirements reflected therein. Third, the new facilities will create additional jobs, additional tax revenues, and economic development by way of constructing the new

¹ While a project is not required as a matter of law to meet the "Tartan Factors," the Commission has traditionally analyzed CCN applications using those factors. See *In Re Tartan Energy*, GA-94-127, 3 Mo. P.S.C. 3d 173, 177 (1994).

facilities and providing an available interconnection for future generation projects in central Missouri.

- c. Ameren Missouri has the financial ability to own, operate, and maintain the new facilities, estimated to cost approximately ****_____,**** as the cost is a small fraction of both Ameren Missouri's existing rate base and planned capital additions over the next five years. Moreover, Ameren Missouri has sufficient access to capital markets based on, among other things, its stable credit ratings of Baa1 and BBB+, per Moody's and Standard & Poor's credit rating agencies, respectively.
- d. Ameren Missouri is qualified to own, operate, and maintain the new facilities given that it has developed, owns, and operates numerous transmission substations and thousands of miles of electric transmission lines.
- e. Operation and maintenance of the new facilities is in the public interest for the reasons discussed herein. It should be noted that because factors "a" through "d" are satisfied, the Commission would generally conclude that factor "e," the public interest, is also served by granting the CCN.

SPECIFIC REQUIREMENTS APPLICABLE TO
CCN APPLICATIONS FOR NEW ASSETS

- 14. Depictions of the proposed locations for the new facilities are found in **Appendix 1. 20 CSR 4240-20.045(6)(A).**
- 15. The new facilities will not cross any lines of any utility companies (regulated or nonregulated), nor will the new facilities cross any railroad tracks or underground facilities, as defined in Section 319.015, RSMo. 20 CSR 4240-20.045(6)(B).

16. A list of plans, specifications, and drawings for construction of the new facilities are provided in **Appendix 2-C**. 20 CSR 4240-20.045(6)(C). **Appendix 2-C** is marked confidential pursuant to 20 CSR 4240-2.135(2)(A)4.

17. Ameren Missouri estimates that construction of the new facilities will cost approximately ****_____****.

18. Ameren Missouri intends to commence construction of the new facilities in Q1 2027 and anticipates the facilities will be completely operational and in service by Q2 2028. Ameren Missouri respectfully requests the Commission issue an order approving the *Application* and granting the CCN requested herein no later than February 28, 2027.

19. Ameren Missouri anticipates that no portion of the new facilities will be shared with any other plant. 20 CSR 4240-20.045(6)(E).

20. Ameren Missouri will finance its investment in the construction of the new facilities through existing funds in its treasury. 20 CSR 4240-20.045(6)(F).

21. Construction of the new facilities is not inconsistent with Ameren Missouri's current Preferred Resource Plan. 20 CSR 4240-20.045(6)(G).

22. Ameren Missouri plans to use a competitive bidding process for the construction of the new facilities. Specifically, a competitive sourcing process will be used to secure bids for outside labor, and for materials and equipment necessary to construct the new facilities that includes: (i) formation of a contract development team to identify and write the scope of work to be completed, identification of qualified contractors for bidding and the criteria for selecting contractors; (ii) evaluation of the statements of qualification and bids received from bidders; and (iii) negotiation of the terms and conditions most favorable to Ameren Missouri. 20 CSR 4240-20.045(6)(H).

23. Once the new facilities are complete, Ameren Missouri will operate and maintain the new facilities in the same manner and fashion as it does all of its transmission lines and electric transmission substations. The substation will be operated from a primary control center that will conduct all operational switching and coordination with adjacent and interconnected systems. The new facilities will be continuously monitored through SCADA by the control center. The control center is staffed around-the-clock by system operators that are certified by NERC. The system operators are required to maintain their certification through a combination of computer-based training and live system simulation drills. In order to minimize any potential disruption to operating the transmission system, backup control centers are also in place in the unlikely event that the primary control center must be evacuated. All maintenance will be performed by Ameren Missouri or Ameren Services employees, or contractors retained by them in the same manner and fashion as maintenance is performed on other Ameren Missouri substations. All transmission substations are inspected routinely, and the individual equipment contained therein (breakers, etc.) is subject to an internal substation maintenance strategy, which specifies equipment-specific maintenance expectations. Substation equipment is maintained to meet or exceed the requirements set by NERC and documentation verifying compliance is maintained. Additionally, the intervals at which maintenance activities are performed and the scope of work executed on any maintenance projects or visits are documented. 20 CSR 4240-20.045(6)(I).

24. After the rerouted transmission lines are placed into service, various Ameren Services transmission maintenance and management groups (line, substation, vegetation) will follow a routine cycle of patrols and coordinate scheduled maintenance. The patrols will be a combination of aerial patrols and foot patrols as defined by internal maintenance standards. Any maintenance issues identified during the patrols will be given priority as provided by internal

maintenance standards and a remediation action will be scheduled based upon that priority. Ameren Services will then identify the labor resources necessary to address the remediation. In general, Ameren Services has a complete and robust line maintenance program that is defined by and subject to numerous internal standards, including those governing the routine patrol of assets and providing expectations around the repair of any issues that are identified. 20 CSR 4240-20.045(6)(I).

25. Ameren Missouri follows documented processes governing responses to unplanned outages. In the event of an unplanned outage, subject matter experts will be assigned to review the outage data, utilize fault location information to determine distance to fault, dispatch field resources to assess damage, and determine material and labor resources (internal and external) necessary for the safest and most efficient restoration. 20 CSR 4240-20.045(6)(J).

26. Because Ameren Missouri owns the land upon which the new facilities will be located, there are no directly affected landowners and notice is not required. 20 CSR 4240-20.045(6)(K).

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant it a certificate of convenience and necessity to construct, install, own, operate, maintain, and otherwise control the new facilities as described herein, to be effective on or before February 28, 2027.

Respectfully submitted,

/s/ Jennifer L. Hernandez

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

VERIFICATION

The undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Application* is true and correct to the best of his knowledge, information, and belief.

This request is not inconsistent with Ameren Missouri's current Preferred Resource Plan required by 20 CSR 4240-Chapter 22.

/s/ Lucas D. Klein

Lucas D. Klein

Vice-President, Project Management

Ameren Services Company, agent for Union

Electric Company d/b/a Ameren Missouri

CERTIFICATE OF SERVICE

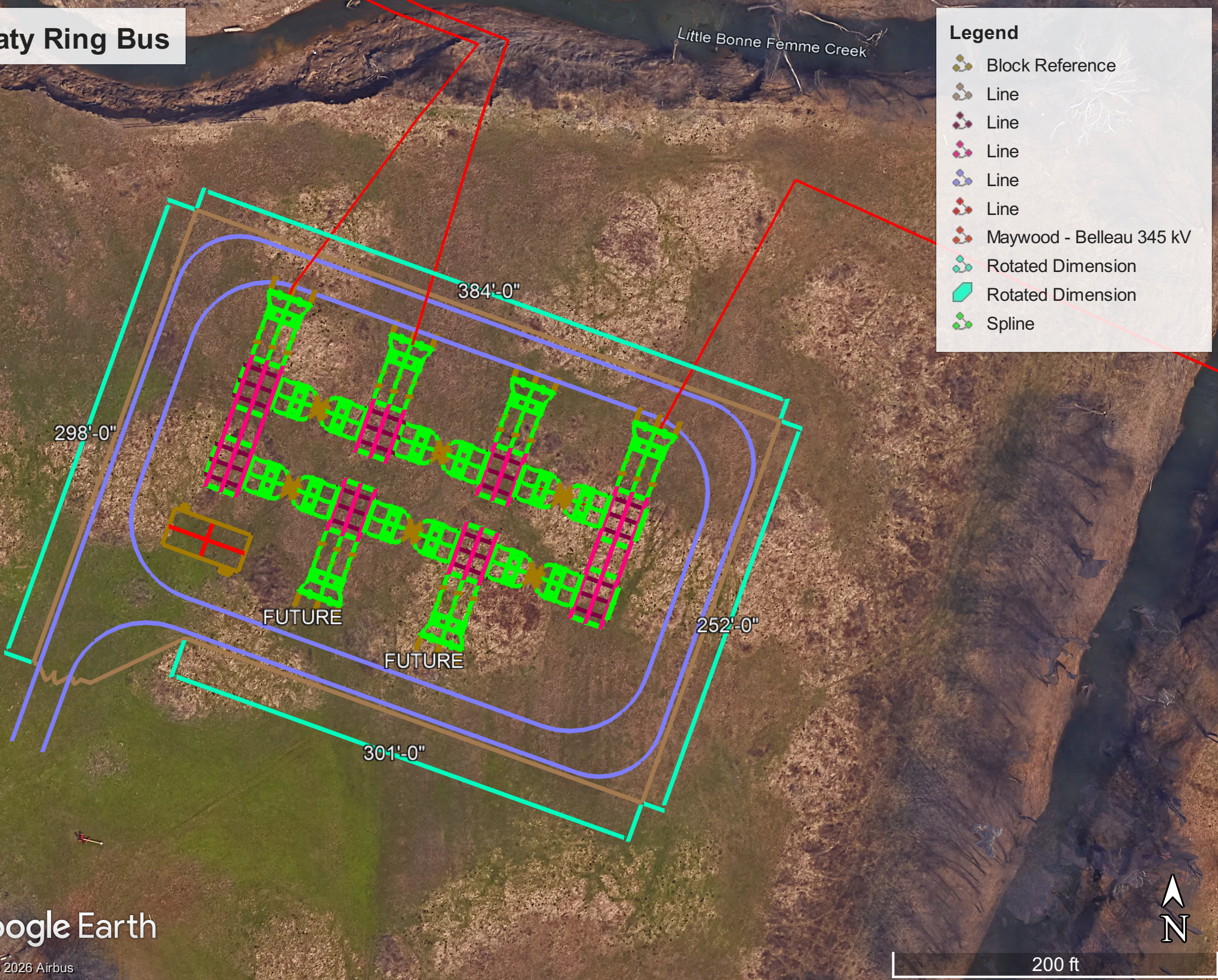
The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail on this 16th day of October 2026.

/s/ Jennifer L. Hernandez

Katy Ring Bus

Legend

- Block Reference
- Line
- Line
- Line
- Line
- Line
- Maywood - Belleau 345 kV
- Rotated Dimension
- Rotated Dimension
- Spline



EA-2027-0009

APPENDIX 2
IS CONFIDENTIAL
IN ITS ENTIRETY