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, Operate and Maintain a Distribution Substation in Iron County, Missouri, and for a Waiver of Certain Tariff Provisions	)	Case No. EA-2026-0253

VERIFIED APPLICATION FOR CCN
AND REQUEST FOR VARIANCES

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri," "Company," or "Applicant"), pursuant to RSMo. §393.170.1 and Missouri Public Service Commission ("Commission") Rules 20 CSR 4240-2.060 and 20 CSR 4240-20.045, and hereby submits its Application for an order granting it a certificate of convenience and necessity ("CCN") to construct, install, own, operate, maintain, and otherwise control a new 161 kV / 4 kV distribution substation and associated facilities (the "BRRD Substation") and the relocated portion of two existing 161kV electrical distribution lines, all located in Iron County, Missouri, and granting variances from portions of the Company's electric tariff ("Application"). In support of this Application, Ameren Missouri respectfully states as follows to the Commission:

I. 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. There is already on file with the Commission a certified copy of Applicant's Articles of Incorporation (*see* Case No. EA-87-105), a copy of the Applicant's Fictitious Name Registration as filed with the Missouri Secretary

of State's Office (*see* Case No. EA-2026-0058), and a Certificate of Corporate Good Standing for Applicant (*see* Case No. EA-2026-0058), which are incorporated herein by this reference.

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

Steven M. Wills
Sr. Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
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3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application. Ameren Missouri has no overdue annual report or assessment fees.

II. The Facilities

4. Ameren Missouri entered into a Memorandum of Understanding with a customer regarding the parties' intent to enter into construction agreements to complete the relocation of two existing 161 kV transmissions lines and the construction of the BRRD Substation, subject to Ameren Missouri obtaining a CCN from the Commission. The Memorandum of Understanding is attached hereto as Confidential Exhibit 1.

5. The referenced customer is currently served by a substation, owned by the customer, that has been in service since 1964 and is at the end of its useful life. Further, the existing substation is subject to accelerated corrosion given its proximity to two large steam sources. Indeed, under federal Mine Safety and Health Administration ("MSHA") rules, special Tyvek suits

and respirators are required for Ameren Missouri field personnel to perform work in or near the substation.

6. To replace the current substation that is near the end of its life and create a safer working environment for Ameren Missouri field personnel, a substation needs to be constructed in a different location. The new location will provide improved conditions for the substation equipment with respect to corrosion.

7. Further, since Ameren Missouri will be constructing the substation in a new location, the entire substation will be operational prior to switching over. If the new substation were built in the same location, there would need to be a complex operation involving building one side at a time and switching over in a phased manner. This would require a complex construction phasing sequence and present a potential safety risk with demolition and construction in the same tight space. Additionally, new infrastructure affords the opportunity to begin from the bottom up, with current best practices, versus a significant retrofit of existing equipment on the customer's side.

8. For the new BRRD substation, to be owned and operated by Ameren Missouri, the Company will purchase and install two 161kV/4kV, 14 MVA transformers and associated line exit equipment. The transformers and associated line exit equipment will be designed, procured, installed, owned, operated, and maintained by Ameren Missouri. The Company's ownership will end at the 4 kV bushings of the two transformers.

9. The customer-requested line rerouting involves 1,662 feet of the Galena–Buick Smelter–7584 line between and inclusive of structures 2177A through 2179 and 1,760 feet of the Galena–Buick Smelter–7455 line between and inclusive of structures 1119 through 1121. The rerouting will be accomplished by installing new wood structures.

10. Diagrams showing the locations of the new BRRD substation and relocated lines, as proposed, are provided within Confidential Exhibit 3.

11. The new BRRD substation and the rerouted transmission lines (collectively, the "New Facilities") will be located outside of Ameren Missouri's retail service territory, meaning that the New Facilities constitute assets within the meaning of Commission Rule 20 CSR 4240-20.045(1)(A)(2).

12. The planned locations for the New Facilities are within the service territory of Black River Electric Cooperative. As shown in Exhibit 2 attached hereto, Black River Electric Cooperative acknowledges that Ameren Missouri has served the customer at the subject location, under a territorial agreement approved by the Commission in Case No. EO-95-100, for a significant period of time. Ameren Missouri will supplement this Application with an affidavit indicating that Black River Electric Cooperative does not object to the New Facilities being built in their service territory.

13. The New Facilities will be constructed upon land that is owned by the customer, and the customer will grant utility easements to Ameren Missouri.

14. The estimated cost for the line relocation is $1.1M. The estimated cost for the new BRRD substation is $7.1M.

III. Request for a CCN

15. Ameren Missouri requests that it be granted a CCN to construct, own, operate and maintain the New Facilities.

16. An analysis of the "Tartan Factors," typically relied upon by the Commission in evaluating CCN requests,[1] supports issuance of the requested CCN.

a. The New Facilities are needed. As explained above, construction of the new BRRD substation will replace aged infrastructure and create a safer working environment for Ameren Missouri field personnel, with the line relocation requested by the customer.

b. The construction, operation, and maintenance of the New Facilities by Ameren Missouri is economically feasible. 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, which it has. Second, the New Facilities' equipment and construction are being procured/performed in accordance with the Company's procurement procedures and policies, including competitive bidding requirements reflected therein.

c. Ameren Missouri has the financial ability to own, operate, and maintain the New Facilities, which are estimated, together, to cost approximately $8.2M, which is a small fraction of Ameren Missouri's existing rate base. Moreover, the Company has sufficient access to capital markets based on, among other things, its stable credit ratings.

d. Ameren Missouri is qualified to construct, own, operate, and maintain the New Facilities, given that it has developed, owns, and operates numerous distribution substations and thousands of miles of electric transmission lines.

[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).

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, without more, that factor "e" (in the public interest) is also served by granting the requested CCN.[2]

17. The facts set forth herein demonstrate that issuance of a CCN for the New Facilities is required by the public convenience and necessity.

18. In satisfaction of Commission Rule 20 CSR 4240-20.045(6)(A), depictions of the proposed locations for the New Facilities are contained within Confidential Exhibit 3.

19. 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 RSMo. §319.015. (20 CSR 4240-20.045(6)(B))

20. In satisfaction of Commission Rule 20 CSR 4240-20.045(6)(C), a description of the plans, specifications, and costs for construction of the New Facilities are provided in Confidential Exhibit 3 attached hereto.

21. Ameren Missouri intends to commence construction of the New Facilities in 2027 and anticipates that they will be fully operational by the end of 2027. (20 CSR 4240-20.045(6)(D))

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

23. 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))

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

[2] *Tartan Energy*, 3 Mo. P.S.C. 3d at 189 (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. 554, 561 (1991)).

25. 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 qualifications 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))

26. 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 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 the North American Electric Reliability Corporation ("NERC"). The system operators are required to maintain their certification through a combination of computer-based training and live system simulation drills. 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 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))

27. After the new and 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. These 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))

28. 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))

29. The New Facilities will be constructed on land owned by the referenced customer and no notice is required to any other landowners as they will not be directly affected by the routes and locations of the New Facilities. (20 CSR 4240-20.045(6)(K))

IV. Request for Variances

30. In conjunction with the requested CCN and the planned construction, the Company requests variances from portions of its Commission-approved tariff book with regard to project costs.

31. Due to the particular facts and circumstances presented here, including safety concerns for Ameren Missouri field personnel, the Company requests variances to allow for the general pooling of the costs and rate base treatment of the New Facilities. Specifically, Ameren Missouri requests variances from portions of its tariff (a) to relieve the customer of the requirement that the customer pay estimated costs, in advance, for the new substation, (b) to relieve the customer of any obligation to pay special facilities charges or other costs in connection with the new substation, and (c) to relieve the customer of any obligation to pay special facilities charges or other costs in connection with the line relocation. The customer will, however, pay a different (higher) rate if the substation serving them becomes Company-owned, leading to offsetting increased revenues.

32. Section N of Part III of the Company's General Rules and Regulations (Sheet No. 123) states, in pertinent part:

> Company may, at its sole discretion, upon Customer's request, relocate any distribution facilities providing service to Customer and/or other parties to a right-of-way acceptable to Company, on or off Customer's premises, following the payment by Customer of the Company's total estimated cost of said relocation. Additionally, at the Company's discretion, it may relocate any distribution facilities based upon safety, reliability, or operational needs at the cost of the Company.

33. Section O of Part III of the Company's General Rules and Regulations (Sheet Nos. 124 and 125) states, in pertinent part:

> Where Customer requests and Company agrees to install distribution facilities not normally contemplated for installation, or otherwise provided for, under Company's

> standard rate schedules, Company may at its option provide such facilities under the provisions of this section. . . .
>
> Where Company agrees to supply distribution facilities under the provisions of Special Facilities in lieu of other alternatives available to Customer, Customer shall pay to Company a one-time contribution equal to the total additional costs incurred by Company in supplying such facilities. Customer shall also pay to Company an additional one-time contribution equal to ninety percent of such total additional costs for the present value of the Company's projected operations, maintenance and subsequent replacement cost of such facilities, which shall be continuously owned and maintained by Company. All charges payable to Company shall be non-refundable and due in advance of construction. Such payments by Customer shall be in addition to any payments required for electric facilities provided under the Company's standard line extension rules or other tariff charges.

34. In addition to the safety concerns providing good cause for the requested variances from Sections N and O of Part III of the Company's General Rules and Regulations, a finding of good cause is supported by the new substation being designed to modern standards to include necessary redundancy.

35. Good cause for the grant of the variances, thus allowing for the general pooling of the costs and rate base treatment of the New Facilities, is further established by the harm that will be avoided through the proposed construction. The requested line relocation will allow the customer to continue operating at this site, supporting economic development and preventing a significant decrease in revenues that contribute to the Company's fixed costs.

36. No other public utility will be affected by the Commission's grant of the requested variances from the Company's tariff.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant it a Certificate of Convenience and Necessity to construct, own, operate, and maintain the New Facilities, pursuant to RSMo. §393.170.1, and, for good cause shown, grant variances from the Company's tariffs as described above. Ameren Missouri requests such other and further relief as is just and proper.

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VERIFICATION

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

This request is substantially consistent with the preferred resource plan required by 20 CSR 4240-Chapter 22.

/s/ Robert B. Dixon
Robert B. Dixon
Vice President, Regulatory & Legislative Affairs
Union Electric Company d/b/a Ameren Missouri

Respectfully submitted,

/s/ Diana C. Carter
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ATTORNEY 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 27th day of October, 2026.

/s/ Diana C. Carter