

**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 Approval of a Variance Regarding the) **File No. EE-2024-0019**
Timing of its Triennial Decommissioning)
Filing Required by 20 CSR 4240-20.070(4))
For the Callaway Energy Center)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Recommendation*, states herein as follows:

1. On July 26, 2023, Union Electric Company, doing business as Ameren Missouri (“Ameren”), filed its *Application* for a variance from Commission Rule 20 CSR 4240-20.070(4), which requires utilities to submit, every third year, an application for approval of its decommissioning cost estimate for and its proposed funding level for the nuclear decommissioning trust fund. Ameren Missouri submitted its last application regarding the Callaway Energy Center (“Callaway”) on November 5, 2020, thus its next application is due September 1, 2023. Ameren Missouri filed its sixty-day notice and the Commission assigned Case No. EO-2023-0448 to the case.

2. Ameren seeks expedited treatment of this *Application*, which also includes a request for a variance from the 60-day notice requirement of 20 CSR 4240-4.017, with respect to this *Application* itself.

3. On July 27, 2023, the Commission ordered Staff to file a recommendation, or a status report stating when it expects to file its recommendation, no later than August 3, 2023

4. Ameren explains that the necessary fieldwork and analysis is not yet completed. Ameren seeks an extension of time, up to and including December 1, 2023, within which to complete and file the required triennial application.

5. Staff recommends that the Commission grant expedited treatment and both variance requests. Staff will review Ameren's triennial decommissioning application when it is filed.

WHEREFORE, Staff recommends that the Commission grant expedited treatment and both variance requests submitted by Ameren; and such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **31st day of July, 2023**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Kevin A. Thompson