Exhibit No.:
Issue(s): *Rush Island*
Witness: *Claire M. Eubanks, PE*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Up Rebuttal Testimony*
Case No.: *ER-2022-0337*
Date Testimony Prepared: *March 24, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, PE

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Jefferson City, Missouri
March 2023

****** Denotes Confidential Information ******

TRUE-UP REBUTTAL TESTIMONY OF

CLAIRE M. EUBANKS, PE

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Q. Please state your name and business address.

A. My name is Claire M. Eubanks and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as the Manager of the Engineering Analysis Department of the Industry Analysis Division.

EXECUTIVE SUMMARY

Q. What is the purpose of your True-up rebuttal testimony?

A. The purpose of my True-up rebuttal testimony is to update Staff's adjustment for Rush Island due to corrections to Staff's production cost model that affected the dispatch of Rush Island in Staff's model. The corrections and updates to Staff's production cost model is discussed in Staff witness Shawn E. Lange's True-up rebuttal testimony.

RUSH ISLAND

Q. How have you updated the Rush Island adjustment?

A. As part of its production cost modeling in this case, Staff modeled the Ameren Missouri generating resources (1) with Rush Island units operating as normal and (2) with Rush Island operating as a System Support Resource ("SSR"). As discussed by Staff witness Shawn E. Lange, Staff's production cost model has been updated to incorporate

known and measurable changes as of December 31, 2022. The results of the production cost model provide the expected generation from these two scenarios.

Staff then calculated a net capacity factor for each unit under these scenarios (i.e. the modeled generation for the test year divided by the expected generation at the average net capability). The comparison of these two scenarios results in a reduction in the units' capacity factor of ** [redacted] ** when operating as an SSR. Staff reduced the rate base associated with Rush Island by this percentage.

Q. Does this conclude your true-up rebuttal testimony?

A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	)))	Case No. ER-2022-0337

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CLAIRE M. EUBANKS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Rebuttal Testimony of Claire M. Eubanks, PE*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Claire M Eubanks

CLAIRE M. EUBANKS, PE

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 22nd day of March 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

D Suzie Mankin

Notary Public