

Exhibit No.:
Issue(s): Securitized Utility Tariff
Charge Calculation;
Rider SUR;
Reconciliation Process
Witness: Steven M. Wills
Type of Exhibit: Direct Testimony
Sponsoring Party: Union Electric Company
File No.: EF-2024-0021
Date Testimony Prepared: November 21, 2023

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EF-2024-0021

DIRECT TESTIMONY

OF

STEVEN M. WILLS

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
November 21, 2023**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PURPOSE OF TESTIMONY	3
III.	RIDER SUR.....	3
IV.	TRUE-UP MECHANISM	7
V.	TRACKING FOR PURPOSES OF RECONCILIATION IN FUTURE GENERAL RATE PROCEEDINGS.....	10
VI.	RIDER SUR CHARGES AND CUSTOMER IMPACTS	10

DIRECT TESTIMONY

OF

STEVEN M. WILLS

FILE NO. EF-2024-0021

I. INTRODUCTION

1

2 **Q. Please state your name and business address.**

3 A. Steven M. Wills, Union Electric Company d/b/a Ameren Missouri
4 (“Ameren Missouri” or “Company”), One Ameren Plaza, 1901 Chouteau Avenue,
5 St. Louis, Missouri 63103.

6 **Q. What is your position with Ameren Missouri?**

7 A. I am the Director of Regulatory Affairs.

8 **Q. Please describe your educational background and employment**
9 **experience.**

10 A. I received a Bachelor of Music degree from the University of Missouri-
11 Columbia in 1996. I subsequently earned a Master of Music degree from Rice University
12 in 1998, then a Master of Business Administration (“M.B.A.”) degree with an emphasis in
13 Economics from St. Louis University in 2002. While pursuing my M.B.A., I interned at
14 Ameren Energy in the Pricing and Analysis Group. Following completion of my M.B.A.
15 in May 2002, I was hired by Laclede Gas Company as a Senior Analyst in its Financial
16 Services Department. In this role, I assisted the Manager of Financial Services in
17 coordinating all financial aspects of rate cases, regulatory filings, rating agency studies and
18 numerous other projects.

1 In June 2004, I joined Ameren Services as a Forecasting Specialist. In this role, I
2 developed forecasting models and systems that supported the Ameren operating
3 companies' involvement in the Midwest Independent Transmission System Operator,
4 Inc.'s ("MISO")¹ Day 2 Energy Markets. In November 2005, I moved into the Corporate
5 Analysis Department of Ameren Services, where I was responsible for performing load
6 research activities, electric and gas sales forecasts, and assisting with weather
7 normalization for rate cases. In January 2007, I accepted a role I briefly held with Ameren
8 Energy Marketing Company as an Asset and Trading Optimization Specialist before
9 returning to Ameren Services as a Senior Commercial Transactions Analyst in July 2007.
10 I was subsequently promoted to the position of Manager, Quantitative Analytics, where I
11 was responsible for overseeing load research, forecasting and weather normalization
12 activities, as well as developing prices for structured wholesale transactions.

13 In April 2015, I accepted a position with Ameren Illinois as its Director, Rates &
14 Analysis. In this role, I was responsible for the group that performed Class Cost of Service,
15 revenue allocation, and rate design activities for Ameren Illinois, as well as maintained and
16 administered that company's tariffs and riders. In December 2016, I accepted a position
17 with the same title at Ameren Missouri. In July of 2022, I was promoted to Director,
18 Regulatory Affairs. In this role, I oversee the teams responsible for contributing to all
19 aspects of the Company's state regulated activities, including the Rates and Analysis team
20 I previously directed.

¹ Now known as the Midcontinent Independent System Operator, Inc.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. What is the purpose of your Direct Testimony?**

3 A. The purpose of my testimony is to describe the Company’s proposed tariff for
4 implementing securitized utility tariff charges designed to recover the Energy Transition Costs²
5 and Financing Costs associated with the retirement of the Rush Island Energy Center. I will
6 describe the tariff’s key provisions, including the method for determining charges that will apply
7 to the customers served under the various rate classifications under which the Company
8 provides retail service.³ I will explain the mechanism for performing true-ups under the tariff of
9 amounts collected versus the amounts needed to service the securitized utility tariff bonds as
10 well as recover ongoing costs of securitization. I will describe the mechanism contemplated by
11 the securitization statute for ensuring alignment between the total actual Energy Transition
12 Costs and upfront Financing Costs ultimately incurred, and the amount securitized. Finally, I
13 will discuss the expected magnitude of the charge to the various classes and the bill impacts that
14 would be experienced by typical customers in those classes.

15 **III. RIDER SUR**

16 **Q. What is Rider SUR?**

17 A. Rider SUR – Securitized Utility Tariff Rider - is a new tariff proposed by
18 the Company for purposes of recovering the amounts necessary to service the securitized
19 utility tariff bonds that the Company is requesting authority from the Commission to issue
20 in this case.⁴ Company witness Mitch Lansford describes in more detail in his Direct
21 Testimony the specific nature of the Energy Transition Costs and upfront Financing Costs

² Capitalized terms not otherwise defined herein have the meanings given them in the securitization statute.

³ Except for any customers taking electrical service under special contracts on August 28, 2021.

⁴ Which includes ongoing financing costs associated the securitized bonds.

1 that the Company proposes to finance in the bond issuance. Company witness Lansford
2 also describes the ongoing Financing Costs that will be recovered through the charges
3 reflected in Rider SUR.

4 Rider SUR, consistent with Missouri's securitization statute, creates a non-
5 bypassable charge (the "Charge") applicable to all retail customers of the Company, except
6 for any customers taking electrical service under special contracts on August 28, 2021,⁵
7 which is designed to recover the amounts needed to service bonds that are to be issued in
8 amounts sufficient to cover the Energy Transition Costs and upfront Financing Costs
9 associated with the retirement of the Rush Island Energy Center. It is the non-bypassable
10 nature of this charge that creates the high degree of certainty of recovery of costs that allow
11 the bonds to be highly rated and therefore achieve a lower interest rate than other forms of
12 financing that would be available to the Company.

13 Rider SUR further defines the details of the proposed charge, including how the
14 specific charge to customers in each of the Company's rate classes will be determined, and
15 how the charge will be applied to customer bills and payments of those bills.

16 **Q. What costs will be included in the determination of the charges under**
17 **Rider SUR?**

18 A. Rider SUR charges will be designed to recover the funds necessary to timely
19 pay principal and interest due on the securitized bonds, as well as ongoing Financing Costs.
20 Witness Lansford describes the costs the Company proposes to include in the principal
21 amount of the bonds, which total approximately \$519 million. The bonds will be structured
22 such that a consistent periodic payment is made over their fifteen-year scheduled life –

⁵ The Company has two such special contracts, the customers that take service under which would be excluded from receiving securitization charges.

1 much like the familiar concept of a standard home mortgage payment. As a result, the
2 charge to customers will generally be stable for the duration of the bonds' scheduled life.
3 However, due to the inclusion of ongoing Financing Costs and true-ups in the Rider's
4 revenue requirement,⁶ the revenues to be collected through the Rider will require some
5 level of ongoing adjustment and will not be completely constant over the life of the Rider.
6 Witness Lansford also describes the ongoing Financing Costs subject to recovery in Rider
7 SUR in his testimony in more detail. I describe the true-up process further below.

8 **Q. What is the estimated monthly revenue requirement that the Company**
9 **expects to base the charge on?**

10 A. The estimated monthly revenue requirement is \$4,334,773 which consists
11 of principal and interest on the bonds of \$4,268,783, and estimated monthly ongoing
12 Financing Costs of \$65,990. These amounts are more fully developed in Witness
13 Lansford's Direct Testimony, schedules, and supporting workpapers.

14 **Q. How does Rider SUR allocate this revenue requirement to the various**
15 **customer classes?**

16 A. The costs are allocated to classes based on the loss-adjusted energy
17 consumption of those classes. The Company is mindful that two other electric utilities in
18 Missouri – Liberty Utilities and Evergy – have preceded it in instituting securitization
19 tariffs. The Company chose to mirror the cost recovery framework ordered by the
20 Commission in the Liberty securitization case and agreed to among the parties to Evergy's
21 case.

⁶ For example, for each period the charge is set based upon a forecasted level of electricity sales, but it is a virtual certainty that actual sales will vary from the assumed level, requiring a true-up (consistent with other riders) to ensure that no more and no less than is needed to service the bonds is ultimately collected.

1 A per kilowatt-hour ("kWh") charge will first be determined by dividing the total
2 revenue requirement applicable to a particular recovery period by the forecasted kWh
3 consumption of the Company's retail customers, inclusive of losses at the level the
4 Company acquires energy to serve its load from MISO – i.e., "at transmission", or inclusive
5 of distribution losses on the Company's system. The final charges applicable to customers'
6 bills will be based on the voltage at which customers are served. For example, all customers
7 served under Rate 1(M) – Residential, 2(M) – Small General Service, and 3(M) – Large
8 General Service are served at secondary voltage levels. There will be a common rate for
9 these three classes which will be designated as the "Secondary" rate. The Charge applicable
10 to each of the voltage levels established in the tariff – Secondary, Primary, High Voltage,
11 and Transmission - will be determined by multiplying that per kWh amount by a specific
12 voltage adjustment factor, so that the charges will be sufficient to recover the revenue
13 requirement based on meter-level consumption of customers. This will result in a slightly
14 differentiated charge by voltage level that corresponds to the voltage level at which
15 customers take electric service from the Company.

16 **Q. When will the Company file adjustments to Rider SUR?**

17 A. In accordance with the provisions of sections 393.1700.2(3)(c)i and
18 393.1700.2(3)(h), prior to the issuance of the bonds, the Company shall submit to the
19 Commission, no later than one business day after the pricing of the securitized utility tariff
20 bonds, an issuance advice letter and revised Rider SUR tariff bearing a proposed effective
21 date, which shall be the date the securitized utility tariff bonds are to be issued. The
22 issuance advice letter shall report the initial securitized utility tariff charges and other
23 information specific to the securitized utility tariff bonds to be issued, as the Commission

1 may require. The Company may proceed with the issuance of the securitized utility tariff
2 bonds unless, prior to noon on the fourth business day after receipt of the issuance advice
3 letter, the Commission issues a disapproval letter directing that the securitized utility tariff
4 bonds as proposed shall not be issued and the basis for that disapproval. Company witness
5 Katrina Niehaus discusses the issuance advice letter process in greater detail.

6 Subsequent to that initial rate filing, Rider SUR will be updated at least semi-
7 annually as further described in my discussion of the true-up provisions of Rider SUR
8 below.

9 IV. TRUE-UP MECHANISM

10 **Q. Is a formula based true-up mechanism required under the securitization**
11 **statute?**

12 **A.** Yes. A formula-based true up mechanism is required by Section
13 393.1700.2(3)(c)e, which states:

14 A formula-based true-up mechanism for making, at least annually,
15 expeditious periodic adjustments in the securitized utility tariff
16 charges that customers are required to pay pursuant to the financing
17 order and for making any adjustments that are necessary to correct
18 for any overcollection or undercollection of the charges or to
19 otherwise ensure the timely payment of securitized utility tariff
20 bonds and financing costs and other required amounts and charges
21 payable under the securitized utility tariff bonds.

22 This true-up is important, because as described earlier, the charges under Rider
23 SUR will be established based on forecasted energy consumption but will be applied to
24 actual customer usage. Differences between forecasted and actual usage are expected to be
25 the largest driver of true-ups. In addition, the total securitized revenue requirement shall be
26 updated for changes in ongoing financing costs incurred as a part of servicing the
27 securitization bonds. This true-up will ensure adequate funds are available to make

1 principal and interest payments on securitization bonds but will also ensure that customers
2 do not overpay.

3 **Q. How will the semi-annual rate filing that contains the true up mechanism**
4 **work?**

5 A. Per Section 393.1700.2(3)(e), the Company is required to file with the
6 Commission, at least annually, a petition or letter applying the formula-based true-up
7 mechanism and based on estimates of consumption for each rate class and other
8 mathematical factors, request administrative approval to make the applicable adjustments.
9 Within 30 days after receiving the Company's request, the Commission is required to either
10 approve the request or inform the Company of any mathematical or clerical errors in its
11 calculation. To achieve this, at least semi-annually (or quarterly beginning 12 months prior
12 to the scheduled final payment date of the latest maturing tranche of each series of
13 securitized bonds) a new estimated revenue requirement will take into account total
14 financing costs (including debt service) for the forecasted upcoming two periods and prior
15 period adjustments. Once the total average charge per kWh is calculated for the upcoming
16 remittance period, it is broken down to specific charges per customer voltage level as I
17 discussed in the previous section of this testimony.

18 **Q. How often does the Company intend to true-up the Charge?**

19 A. The Company proposes to implement a true-up at least semi-annually. In
20 addition to the semi-annual true-up, the Company, acting as the servicer for the
21 securitization bonds, seeks authority to make additional interim true up adjustments at any
22 time to ensure the recovery of revenues sufficient to provide for the timely payment of the
23 securitization bonds and all on-going financing costs payable in connection with the

1 securitization bonds. The calculation will take into account total financing costs (including
2 debt service) for the forecasted upcoming two periods and prior period adjustments. It will
3 also help mitigate bondholders' exposure to differences in actual and estimated sales
4 forecasts, uncollectable accounts receivable, and cash flow variability. Company witness
5 Niehaus discusses the importance of the true-up mechanism to the rating agencies.

6 **Q. Will over- or under-recoveries of the Charge be tracked on a class-by-**
7 **class basis for determining future charge?**

8 A. No. Any over- or under-recoveries for any prior period will simply be used to adjust
9 the periodic revenue requirement for the next period. As discussed by Company witness
10 Niehaus, this "cross collateralization" will strengthen the security for the securitization
11 bonds.

12 **Q. How long will the Charges be imposed and collected?**

13 A. The Charge will be imposed and collected until the associated securitization
14 bonds and the related Financing Costs have been paid in full and fully recovered.

15 **Q. What will happen with Charge collections following repayment of the**
16 **associated securitization bonds and any related financing costs?**

17 A. After all securitization bonds and ongoing Financing Costs have been paid
18 in full, the Charge will no longer be billed to or collected from customers. Any remaining
19 amounts held by the SPE (exclusive of the amounts in the capital subaccount, representing
20 the equity contribution, together with any return on the capital subaccount) will be remitted
21 to Ameren Missouri, as applicable, to be credited to customers' bills.

1 **V. TRACKING FOR PURPOSES OF RECONCILIATION IN FUTURE**
2 **GENERAL RATE PROCEEDINGS**

3 **Q. What is the purpose of this section of your testimony?**

4 A. In this section I will describe the reconciliation process for differences in
5 estimated costs included in the principal amount securitized and actual costs.

6 **Q. Will any differences between actual Energy Transition and Financing**
7 **Costs and the principal amount of the bonds based on the estimated Energy**
8 **Transition and Financing Costs be reconciled?**

9 A. Yes. Because the Company is proposing to include the estimated amounts
10 for certain items in its Energy Transition Costs, like decommissioning and environmental
11 compliance costs which cannot be known precisely in advance, and the upfront Financing
12 Costs are also not known precisely in advance, the Company requests a regulatory account
13 (asset or liability) to reconcile any differences between the estimates provided within this
14 proceeding and the actual costs. An amortization of the balance of the regulatory account
15 will be included in the Company's revenue requirement in future general rate proceedings.

16 **VI. RIDER SUR CHARGES AND CUSTOMER IMPACTS**

17 **Q. Have you calculated an estimate of what the charges to the various rate**
18 **classes is expected to be when the Rider SUR is applied to customer bills following**
19 **issuance of the securitized bonds?**

20 A. Yes. Following the method I described in the section of testimony above
21 that explains Rider SUR, I have calculated estimated charges by voltage level and bill
22 impacts by rate class. Based on the monthly revenue requirement that I described
23 previously, a forecast of class kWh at transmission for the time period of December 2024

1 through November 2025,⁷ and the Voltage Adjustment Factors applicable to each service
2 voltage at which the Company provides retail service, the estimated charges would be as
3 shown in Table 1 below:

4 **Table 1 – Estimated Initial Securitization Rate by Service Voltage**

Service Voltage	Securitization Rate
Secondary	\$0.00168
Primary	\$0.00163
High Voltage	\$0.00160
Transmission	\$0.00158

5 **Q. What are the estimated⁸ monthly charges that would apply to a typical**
6 **residential customer, and to customers in the Company's other rate classes, based on**
7 **the estimated rate?**

8 A. Based on the average monthly usage of residential customers used to
9 establish billing units in the Company's most recent electric rate review, File No. ER-2022-
10 0337, of 1,021 kWh per customer per month, the typical residential customer would see a
11 monthly charge of \$1.71. This charge will be presented as a separate line item on customer
12 bills. Charges to the average customer in each tariffed rate class below, based on billing
13 units from the same rate review, and assuming 4(M) – Small Primary Service and 11(M) –
14 Large Primary Service customers take service at standard primary voltages, the expected
15 applicable monthly securitization charges would be as shown in Table 2 below.

⁷ I have used the first 12-month period after expected bond issuance to represent the expected average charge customers would experience over an entire year, despite the fact that the first RP will only include 6 months of usage, per the Company's plan to true-up Rider SUR semi-annually.

⁸ The estimated monthly charges are based on certain estimated items, for example current interest rates and an incomplete assessment of costs to be incurred by the Commission associated with reviewing the securitization application that are included in the financing costs to be securitized, but actual charges will be based on current information related to these estimated items at the time the bonds are issued.

1
2

Table 2 – Expected Monthly Bill Impact for Customer with Class Average Usage

Rate Schedule	Avg. Usage (kWh)	Monthly Bill Impact
1(M) - Residential	1,021	\$1.71
2(M) - Small General Service	1,819	\$3.06
3(M) - Large General Service	56,381	\$94.72
4(M) - Small Primary Service	439,209	\$715.91
11(M) - Large Primary Service	4,703,685	\$7,667.01

3

Q. Does this conclude your Direct Testimony?

4

A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Petition of Union)
Electric Company d/b/a Ameren Missouri)
for a Financing Order Authorizing the Issue) EF-2024-0021
of Securitized Utility Tariff Bonds for)
Energy Transition Costs related to Rush)
Island Energy Center.)

AFFIDAVIT OF STEVEN M. WILLS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Steven M. Wills, being first duly sworn on his oath, states:

My name is Steven M. Wills, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Steven M. Wills
Steven M. Wills

Sworn to me this 16th day of November 2023.

APPLYING TO MISSOURI SERVICE AREA

SECURITIZED UTILITY TARIFF RIDER
Rider SUR

APPLICABILITY

The collection of securitized utility tariff charges authorized under a financing order shall be nonbypassable and paid by all existing and future retail customers receiving electrical service from the Company or its successors or assignees under Commission-approved rate schedules (except for customers receiving electrical service under special contracts on August 28, 2021), even if a retail customer elects to purchase electricity from an alternative electric supplier following a fundamental change in regulation of public utilities in this state.

This Securitized Utility Tariff Rider is applicable to energy consumed under the Company's various rate schedules, except for customers receiving electrical service under special contracts on August 28, 2021. Charges pursuant to this Rider SUR shall be presented on each customer's bill as a separate line item including the rate applicable to each kWh and the amount of the total charge and include a statement to the effect that the Special Purpose Entity ("SPE") is the owner of the rights to charge and that Company is acting as servicer for the SPE. Rider SUR shall remain applicable to each kWh for so long as the securitized utility tariff bonds are outstanding and until all financing costs have been paid in full, and any necessary true-ups have been made.

Rider SUR was authorized in Case No. EF-2024-0021. A SPE, or its successors or assignees, as applicable, is the owner of the securitized utility tariff property which includes all rights to impose, bill, charge, collect, and receive the relevant Securitized Utility Tariff Charge and to obtain periodic adjustment to such charges. Company, as servicer, or other third-party servicer, shall act as SPE's collection agent for the relevant Securitized Utility Tariff Charge, separate and apart from the other rates, riders, and charges specified in this Tariff.

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS

APPLYING TO MISSOURI SERVICE AREA

SECURITIZED UTILITY TARIFF RIDER
Rider SUR

RATE DETERMINATION

Rates under this Rider SUR will be adjusted at least semi-annually in order to ensure that the expected collection of amounts authorized in Case No. ER-2024-0021, and in accordance with the provisions of RSMo Section 393.1700, are adequate to pay when due, pursuant to the expected amortization schedule, principal and interest on the bonds and pay on a timely basis other financing costs.

Rider SUR rates shall be calculated by dividing the total periodic securitized revenue requirement by the forecasted period projected sales including distribution losses and multiplied by the voltage expansion factor, as shown in the following formula:

SURx = ((TSRR + T + A) ÷ SRP) x VAFx

where:

SURx = Rider SUR Rate for the period, applicable to indicated VAF;

TSRR = Total Securitized Revenue Requirement shall consist of all securitized utility tariff costs, including principal and interest due during the recovery period related to securitized energy transition and financing costs, along with ongoing costs required to service the securitized utility tariff bonds during the recovery period, as approved under the financing order;

T = The Total Securitized Revenue Requirement True-up Amount for any variations calculated in accordance with the True-up Formula set forth in this Rider SUR below;

A = An allowance to the extent necessary to align revenue recovery with payment obligations. This allowance will be returned to customers as a credit periodically to reduce the charge;

SRP = Applicable Recovery Period estimated kWh representing the expected retail component of the Company's load settled at its MISO CP node (AMMO.UE or successor node), plus the metered net energy output of any generating station operating within its certificated service territory as a behind the meter resource in MISO, the output of which served to reduce the Company's load settled at its MISO CP node (AMMO.UE or successor node);

VAFx = Expansion factor by voltage level^1

VAFsec = Expansion factor for Secondary Voltage Service

VAFprim = Expansion factor for Primary Voltage Service

VAFHV = Expansion factor for High Voltage Service

VAFtrans = Expansion factor for Transmission Voltage Service

^1 The expansion factors shall match the Voltage Adjustment Factors in effect from time-to-time under Rider FAC.

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk Chairman & President
NAME OF OFFICER TITLE

St. Louis, Missouri
ADDRESS

APPLYING TO MISSOURI SERVICE AREA

**SECURITIZED UTILITY TARIFF RIDER
Rider SUR**

RECOVERY PERIODS

"Recovery Period" (RP) means the period for which a given SUR Rate is in effect. The initial Recovery Period shall begin on the effective date of the first tariff providing an effective SUR Rate, and conclude the day prior to the next occurring subsequent RP until the TSRR has been paid in full.

RPs will generally be 6 months in duration except where additional filings have been made prior to the completion of a previously established RP as required to accommodate a True-Up. If an RP is less than 6 months in duration, the recovery period amounts for the components of the SUR Rate determination and related calculations shall be adjusted accordingly.

To accommodate timing of filings to establish or change the SUR Rate, some required data contemplated to be actual may be projected as of the time of filing. To the extent projected data for one or more months is used to calculate SUR Rates, in subsequent SUR Rate filings such projections will be reconciled against actual data as it becomes available.

TRUE-UP

The Company as servicer shall semi-annually file proposed Rider SUR Rates implementing a True-Up bearing a 30-day effective date. At the servicer's discretion, SUR Rate filings implementing a True-Up may be made more frequently as necessary with a 30-day effective date. Workpapers and necessary documentation supporting each element of the TSRR shall be included under affidavit with each SUR Rate filing. At the time of each True-Up, the servicer will provide a new TSRR amount for the coming RP which shall incorporate any variations calculated through a reconciliation of the current period TSRR actuals to estimates to the extent that actuals are available.

SURR Rate filings implementing a True-Up and incorporating revised SURR calculations shall be made quarterly beginning twelve months prior to the final scheduled payment date of the last tranche of each series of the securitized utility tariff bonds.

TRUE-UP FORMULA

$T = \text{Periodic Payment Requirement}_{\text{Current RP}} - \text{SUTC Remittances}_{\text{CurrentRP}}$
where:

Periodic Payment Requirement = The portion of the TSRR used to calculate the current SUR Rates applicable to the current RP.

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS

APPLYING TO MISSOURI SERVICE AREA

SUTC Remittances = The SUR revenue received or projected to be received during the current RP resulting from the application of the current SUR Rates.

To accommodate timing of SUR Rate filings, some required data contemplated to be actual may be projected as of the time of filing. To the extent projected data for one or more months is used to calculate SUR Rates, in subsequent SUR Rate filings, such projections will be reconciled against actual data as it becomes available.

At the time of each True-Up, the servicer will provide a new TSRR amount for the coming RP which shall incorporate any variations calculated through a reconciliation of the current period TSRR actuals to estimates to the extent that actuals are available.

ADDITIONAL TERMS

1. Treatment of partial payments on customer bills - when a customer remits payment for the customer's monthly utility bill, the first dollars collected shall be attributed to past due balances, if any. To the extent that a customer remits an amount less than the full amount due for a given prior or current period, the amount of the payment that is attributed to covering charges under Rider SUR shall be prorated based on the relative proportion of those SUR charges to the total amount due for utility service in that prior or current period bill.

2. Treatment for Net Metering Rates - For customers subject to billing under the Net-metering Easy Connection Act (Act), if the electricity supplied by the Company exceeds the electricity generated by the customer-generator during a billing period, the customer-generator shall be billed the applicable SUR Rate for each kWh as netted pursuant to the terms of the Act and this tariff. If the electricity generated by the customer-generator exceeds the electricity supplied to by the Company during a billing period, the customer shall not be issued a credit based on the SUR Rate applicable to each kWh as netted pursuant to the terms of the Act and this tariff, nor shall the SUR Rate be considered to be part of the avoided fuel cost of the Company for purposes of the Act. For customers who are authorized to back-flow energy under some other provision of law, or for any portion of back-flowed energy that exceeds that authorized under the terms of applicable net-metering provisions, the SUR Rate shall be applicable to each kWh provided by the Company, without any offset.

3. Differences between the actual securitized utility tariff costs financed by securitized utility tariff bonds and the final securitized utility tariff costs incurred by the Company or assignee, shall be tracked by Company or assignee and included in a regulatory liability or regulatory asset account, as appropriate, to be reconciled in Ameren Missouri's next general rate case.

4. Filing Procedure
Initial Rate Filing - In accordance with the provisions of section 393.1700.2(3)(h), prior to the issuance of bonds, the Company shall submit to the Commission, no later than one business day after the pricing of the securitized utility tariff bonds, an issuance advice letter and revised Schedule SUR tariff

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS

M.O.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 90

CANCELLING M.O.P.S.C. SCHEDULE NO. 6

SHEET NO. 90

APPLYING TO MISSOURI SERVICE AREA

sheets bearing a proposed effective date, which shall be the date the securitized utility tariff bonds are to be issued. The issuance advice letter shall report the initial securitized utility tariff charges and other information specific to the securitized utility tariff bonds to be issued, as the Commission may require. The Company may proceed with the issuance of the securitized utility tariff bonds unless, prior to noon on the fourth business day after receipt of the issuance advice letter, the Commission issues a disapproval letter directing that the securitized utility tariff bonds as proposed shall not be issued and the basis for that disapproval.

For all filings - On or before each filing, the Company shall prepare and file under affidavit the workpapers and supporting documentation supporting the Total Securitized Revenue Requirement and SUR Rates being filed, ensuring that all SUR Rates in effect for a current period are published at all times bills are rendered for service at that rate, and an SUR Rate is not applied to usage that occurred prior to the effective date of the SUR Rate.

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS

M.O.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 90

CANCELLING M.O.P.S.C. SCHEDULE NO. 6

SHEET NO. 90

APPLYING TO MISSOURI SERVICE AREA

**SECURITIZED UTILITY TARIFF RIDER
SUR**

Calculation of Current Securitized Utility Tariff Rate

Applicable to service provided on [EFFECTIVE DATE] through [End date of RP].

Total Securitized Revenue Requirement (TSRR)		\$XX,XXX,XXX
Securitized Revenue Requirement True-Up (T)	+	\$XX,XXX,XXX
Allowance (A)	+	\$XX,XXX,XXX
Estimated Recovery Period Sales (S _{RP})	÷	XX,XXX,XXX,XXX
SUR Rate	=	\$X.XXXXXX/kWh

Loss Adjusted SUR Rates

Secondary Voltage Adjustment Factor (VAF _{SEC})		1.0539
Secondary (SUR Rate x VAF _{SEC})	=	\$X.XXXXXX/kWh

Primary Voltage Adjustment Factor (VAF _{PRI})		1.0222
Primary (SUR Rate x VAF _{PRI})	=	\$X.XXXXXX/kWh

High Voltage Adjustment Factor (VAF _{HV})		1.0059
Substation (SUR Rate x VAF _{HV})	=	\$X.XXXXXX/kWh

Transmission Adjustment Factor (VAF _{TRANS})		.9928
Transmission (SUR Rate x VAF _{TRANS})	=	\$X.XXXXXX/kWh

DATE OF ISSUE XXXXXXXX XX, 2024

DATE EFFECTIVE XXXXX XX, 2024

ISSUED BY Mark C. Birk
NAME OF OFFICER

Chairman & President
TITLE

St. Louis, Missouri
ADDRESS