

Ameren Missouri  
Case Name: EF-2024-0021  
Docket No(s): Securitization

Response to Discovery Request: OPC-OPC 8509 REV  
Date of Response: 1/16/2024  
Witness: N/A

Question: Please describe in detail the work needed with estimates of the associated costs to close the ash ponds at Rush Island.

Response:

**Prepared By: Ben Hasse**  
**Title: Manager-Regulatory Accounting and CAM**  
**Date: 1/9/24**

The Company is revising this response because it has come to our attention that we inadvertently double-counted certain water treatment and monitoring costs in the revenue requirement included in our direct testimony.

The ARO costs noted on line 10 of Schedule MJL-D1 contain prior estimates for water treatment and monitoring costs required under the CCR rule. These prior estimates do not incorporate current cost levels or the Company's experience from a recent water treatment pilot conducted at another energy center. The Company's best estimate of water treatment and monitoring costs at the site is \$4,615,042, as noted on line 11 of Schedule MJL-D1. Additional costs (that were included in ARO costs and not double-counted in the Company's direct testimony revenue requirement) of \$149,356 are necessary to cover required ongoing closure cap maintenance and represent the revised total of line 10 in Schedule MJL-D1. See attached file "Rush Island Ash Pond Closure Cap Maintenance" for this additional work. As a result of this correction, line 10 is overstated by \$2,454,802.

Revised total estimated ARO costs relating to the water treatment, water monitoring, and cap maintenance necessary to include in the Company's revenue requirement in this case is \$4,764,398, the revised subtotal of line 10 and 11.