

**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 of Securitized Utility Tariff Bonds)
for Energy Transition Costs related to)
Rush Island Energy Center)
Case No. EF-2024-0021

**PUBLIC COUNSEL’S MOTION FOR LEAVE TO
CORRECT SCHEDULES DM-S-4, DM-S-5, DM-S-6 AND DM-S-7**

COMES NOW the Office of Public Counsel (“Public Counsel”) and moves the Commission for leave to correct Schedules DM-S-4, DM-S-5, DM-S-6, and DM-S-7 to the surrebuttal testimony of Public Counsel witness David Murray prefiled March 22, 2024, on the ground that he used the wrong balance for Ameren Missouri’s expected total accumulated deferred income tax (“ADIT”) balance at August 31, 2024. Mr. Murray’s original input only captured the expected statutory ADIT and excess ADIT, but not the additional ADIT for Ameren Missouri’s abandonment of Rush Island. This additional ADIT is accurately captured by multiplying Ameren Missouri’s tax rate by the expected net book balance for Rush Island at August 31, 2024.

Additionally, in his Schedules DM-S-6 and DM-S-7 Mr. Murray did not use the same 5% discount rate that he had used for Schedules DM-S-4 and DM-S-5. Mr. Murray’s Corrected Schedules DM-S-6 and DM-S-7 apply a 5% discount rate to determine the net present value of revenue requirements.

Corrected Schedules DM-S-4, DM-S-5, DM-S-6, and DM-S-7 are attached hereto and should replace Schedules DM-S-4, DM-S-5, DM-S-6, and DM-S-7 attached to the surrebuttal testimony of Public Counsel witness David Murray prefiled March 22, 2024.

Respectfully,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of April 2024.

/s/ Nathan Williams