

FILED
April 30, 2024
Data Center
Missouri Public
Service Commission

Exhibit No. 26

Ameren – Exhibit 26
OPC Data Request 1105
File No. EF-2024-0021

~~EX 26~~
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Ameren Missouri's
Response to OPC Data Request - OPC
EF-2024-0021

In the Matter of the Request of Union Electric Company d/b/a Ameren Missouri for Issuance of a
Financing Order Arising From the Retirement of its Rush Island Energy Center.

No.: OPC 1105

Presently, how long (years) is Ameren Missouri required to (1) treat water and (2) monitor
groundwater for contaminants from the Rush Island site?

RESPONSE

Prepared By: Craig J. Giesmann
Title: Director, Environmental Services
Date: 12-28-2023

Groundwater monitoring and treatment at Ameren Missouri's Rush Island site is regulated by the Missouri Department of Natural Resources and the Federal EPA's Coal Combustion Residuals (CCR) Rule. More specifically, MDNR regulates these items through an individual NPDES permit for the site (attached, see pgs. 38-40). The Federal CCR rule is self-implementing, in accordance with 40 CFR 257.104(c). It requires 30 years of post-closure care. If at the end of the post-closure care period the CCR unit is operating under assessment monitoring, post-closure care must continue until the CCR unit returns to detection monitoring in accordance with §257.95.

It is presently unknown how long Ameren Missouri will be required to monitor groundwater at the Rush Island site, since it is unknown how long it will take to meet state and federal requirements. However, Ameren Missouri has implemented a groundwater treatment system at the site wherein the groundwater is pumped to the surface, treated via various treatment techniques, and then returned underground, downstream of the original extraction zone. This system is expected to accelerate the return of the site groundwater to state and federal groundwater requirements, thereby minimizing future treatment and monitoring requirements.

Included in this securitization application is 5 years of groundwater treatment costs (2025-2029) and 8 years of groundwater monitoring costs (2025-2032).