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Sarah Lange
Rebuttal
File No. EF-2024-0021

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Tariff for SUTC
Witness: *Sarah L.K. Lange*
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

DIRECT TESTIMONY

OF

SARAH L.K. LANGE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. EF-2024-0021

Jefferson City, Missouri
February 2024

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **SARAH L. K. LANGE**

4 **AMEREN MISSOURI d/b/a UNION ELECTRIC COMPANY**

5 **CASE NO. EF-2024-0021**

6 Q. Please state your name and business address.

7 A. My name is Sarah L.K. Lange, 200 Madison Street, Jefferson City, MO 65101.

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

9 A. I am employed by the Missouri Public Service Commission (“Commission”) as
10 an Economist for the Tariff/Rate Design Department, in the Industry Analysis Division.

11 Q. Please describe your educational and work background.

12 A. Please see Schedule SLKL-r1.

13 **EXECUTIVE SUMMARY**

14 Q. What is the purpose of your testimony?

15 A. I will respond to the cost allocation and tariff proposals of Mr. Wills. I will also
16 address the billing determinants and applicability of the securitized tariff charge, if approved.

17 Q. What are your specific recommendations?

18 A. I support the cost allocation proposed by Ameren Missouri.¹ I address Ameren
19 Missouri’s identification of “special contract” customers, and exclusion of these customers
20 from the SUR billing determinants and from application of the charge. I recommend
21 modifications to Ameren Missouri’s tariff contents to address shortcomings related to

¹ At page 5 of his direct testimony, Mr. Wills recommends allocation of securitized costs to classes based on the loss-adjusted energy consumption of those classes.

1 (1) clarification of non-bypassability and (2) future proofing. I also recommend that any tariff
2 to implement a “securitized utility tariff charge” that may be ordered in this proceeding be
3 generally in the form attached as Schedule SLKL-r2, which is consistent with the mechanism
4 approved by the Commission for The Empire District Electric Company d/b/a Liberty in
5 File Nos. EO-2022-0040 and File No. EO-2022-0193.

6 **COST ALLOCATION**

7 Q. At page 5 of his direct testimony, Mr. Wills provides the following exchange:

8 Q. How does Rider SUR allocate this revenue requirement to the various
9 customer classes?

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

17 Q. Does Staff support the allocation of costs to classes based on the loss-adjusted
18 energy consumption of those classes?

19 A. Yes. This approach is appropriate for at least four reasons.

- 20 1. The cost recovery at issue here are the costs of the decisions of
21 Ameren Missouri’s management that resulted in a plant that cannot lawfully be
22 operated. As energy is the most basic unit sold by an electric utility, allocation
23 on energy is reasonable.²

² Loss adjusted energy refers to adjusting metered kWh which are metered at different voltages when billed to a consistent voltage to reflect the amount of energy that is needed to provide a kWh of energy at the applicable metered voltage.

1 2. Ameren Missouri testifies that the retirement of Rush Island creates an
2 “energy need.”

3 3. Ameren Missouri testifies that its decisions to retire coal-fired generation and
4 certain oil and natural gas units are driven by environmental policy goals and
5 legislation, not by a traditional capacity objective of meeting system
6 peak demand.

7 4. Customers can and do switch among rate classes and rate schedules, and rate
8 classes and rate schedules come and go over time. Unreasonable outcomes are
9 likely without sufficient tariff provisions that – as yet – have not been developed.
10 The loss-adjusted energy approach has been adopted for Evergy Missouri West
11 Schedule SUR and Liberty SUTC.

12 Q. Has Ameren Missouri filed testimony emphasizing the value of Rush Island as
13 meeting Ameren Missouri’s “energy need?”

14 A. Yes. Ajay Arora, at page 13 – 14 of his direct testimony in File No.
15 EA-2023-0286, includes the following exchange:

16 Q. Please discuss the Company's need for energy resources and how the
17 Solar Projects help fulfill that need.

18 A. As discussed above, Ameren Missouri's coal facilities are reaching
19 end of life, and three of the Company's four coal facilities will retire no
20 later than 2030: the Meramec Energy Center retired at the end of 2022,
21 the Rush Island Energy Center will retire by 2025, and the Sioux Energy
22 Center will retire by 2030. As illustrated in Company witness Michels'
23 Direct Testimony, these retirements are triggering a dramatic swing in
24 the Company's energy position over the next few years, from its current
25 and historical abundantly long position to having a shortage of energy
26 starting in 2028 assuming normal generation and load. The shortage
27 grows steadily thereafter. Specifically, even under normalized planning
28 conditions, Ameren Missouri becomes short by approximately 1 million
29 megawatt-hours ("MWhs") as early as 2028, by approximately 2 million
30 MWhs by 2029, approximately 6 million by 2031 and approximately

1 14 million MWhs by 2037, if no new generation resources are added.
2 In fact, the Company's supply of energy is barely above its needs even
3 as early as 2026 and woefully below the energy buffer the Company has
4 maintained historically to protect our customers from shortages in energy
5 supply and/or exposure to market price spikes. Energy shortages in 2028
6 and 2029 could be increased by an additional 3 million MWhs with
7 recognition of a high price on carbon emissions, which would also mean
8 there is no excess energy at all by 2026. The renewable energy resources
9 the Company plans to add through 2030 reduces this shortage. I should
10 note that the Company's energy positions just discussed above are
11 probably even tighter given that they do not yet account for the lower
12 generation likely to result from the recent CSAPR modifications
13 mentioned above.

14 Q. Has the Commission recognized Ameren Missouri's emphasis on Rush Island's
15 place in the Ameren Missouri fleet as a source of energy as opposed to capacity?

16 A. Yes. The Commission's Report and Order in File No. EA-2022-0245³ at
17 page 12-13, states

18 Analysis by Ameren Missouri of its peak days for each summer and
19 winter month from 2019 through 2021 showed that, without the
20 coal-fired Meramec Energy Center (retired at the end of 2022) and
21 Rush Island Energy Center (scheduled for retirement by the end of
22 2025), the Company would have had to purchase more energy than it
23 generated to serve its native load. On four of the 18 peak days, the
24 estimated added costs to purchase the needed energy to serve its native
25 load would have been over \$1 million for each of those four days, with
26 one peak day in February of 2021 (during Winter Storm Uri) estimated
27 at over \$9 million for that day alone.

28 The Commission cites Mr. Michels' Surrebuttal testimony in that case, at pages 40-41
29 for this discussion.

30 Q. On the pages referenced by the Commission, what was Mr. Michels' testimony?

31 A. Mr. Michels provides the following exchange:

³ In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for a Certificate of Convenience and Necessity for a Solar Facility, Approval of a Subscription-Based Renewable Energy Program, and Authorization to Establish Tracking Mechanism.

1 Q. Can you provide an example of how solar generation can help to
2 mitigate price volatility risk?

3 A. Yes. Table 2 below shows the peak days for each summer and winter
4 month from 2019 through 2021. For each peak day, it shows what the
5 net energy position (generation minus load) would have been had the
6 Meramec and Rush Island coal units not been available to generate, thus
7 simulating a future state in which those units have been retired, which
8 will in fact be a reality as early as next year. Note that in every instance,
9 net energy would have been negative. That is, Ameren Missouri would
10 have had to purchase more energy than it generated to serve native load.

11 Also shown for each peak day is the actual measured solar
12 irradiance, or global horizontal irradiance ("GHI"), in watts per meter
13 squared (w/m^2), along with its ratio compared to the highest daily GHI
14 for that month and that year. Note that for 11 of the 18 months shown,
15 solar irradiance is at or above 80% of its daily maximum for the month,
16 and in four of the nine winter months shown, solar irradiance is at or
17 above 40% of its daily maximum for the year.

18 Table 2 also shows the on-peak and average power prices (LMP)
19 for each peak day and the approximate cost to purchase to cover the
20 energy shortfall at the average LMP. This shows that four of the 18 peak
21 days would have been expected to result in added costs of over a million
22 dollars, with the peak day in February 2021 (during winter storm Uri)
23 seeing a cost of over \$9 million on that day alone. Such events may, and
24 often do, last for multiple days. Company witness Arora also provides
25 an actual example from the Christmas weekend winter storm just last
26 month in his Surrebuttal Testimony.

27 Finally, the table shows the estimated amount of electric energy
28 Boomtown would have produced had it been available on these days and
29 the savings it would have produced at the on-peak LMP. It shows that
30 the Boomtown Project would have been expected to produce tens of
31 thousands of dollars in benefits on most of the peak days and over a
32 hundred thousand dollars on the peak day in August 2021.

33 [Table omitted]

34 Q. How does Ameren Missouri address its decisions to retire coal-fired generation
35 and certain oil and natural gas units in its Integrate Resource Planning filings?

1 A. Ameren Missouri’s 2023 IRP filing⁴ describes concepts such as its energy needs
2 and its planned generation portfolio. The executive summary at pages 9 – 10, includes a section
3 titled “Near-Term Implementation,” which states:

4 As mentioned previously, the transformation of our portfolio will
5 involve actions taken by Ameren Missouri and its customers.
6 For example, Ameren Missouri has already secured certificates of
7 convenience and necessity (CCN) for two solar projects and applied for
8 CCNs for another four solar projects. Together, these six projects total
9 900 MW of the 1,800 MW we plan to add to our portfolio by 2030.
10 We continue to pursue additional solar projects to meet our customers
11 energy needs. We also expect to issue another RFP for wind resources in
12 the near term to identify projects that will fulfill our planned addition of
13 1,000 MW of wind resources by 2030.

14 In addition, Ameren Missouri has received approval to extend its current
15 energy efficiency and demand response programs through 2024.
16 That extension continues many existing programs for residential and
17 business customers, while also offering business demand response
18 customers the option to opt-out. Programs will retain continuity through
19 2024 while allowing for the DSM planning team to account for various
20 factors, such as the Inflation Reduction Act, as the next MEEIA cycle is
21 under discussion.

22 As Ameren Missouri's coal-fired energy centers approach the end of their
23 useful lives, a key step in retiring the units is the assessment of resultant
24 transmission infrastructure needs and the construction of that
25 infrastructure. Our Rush Island Energy Center will be retired by the end
26 of 2024, and the process of putting new transmission system
27 infrastructure in place to support grid reliability needs is underway.
28 With the retirement of our Sioux Energy Center by the end of 2032, we
29 have initiated a similar process to support its retirement. Continued
30 expansion of transmission infrastructure will also be key to integrating
31 renewable wind and solar generation as we transform our portfolio over
32 the next twenty years.

33 Q. What capacity value will Rush Island provide for MISO Resource Adequacy
34 purposes or other purposes upon its retirement?

⁴ EO-2024-0020.

1 A. Rush Island will have no capacity value upon its retirement, and will not be
2 usable or useful to Ameren Missouri customers.

3 Q. Is it reasonable to allocate any Rider SUR charges authorized in this case to
4 Ameren Missouri’s customers on a basis other than loss-adjusted energy sales?

5 A. While metered energy sales may also be a reasonable allocation, loss-adjusted
6 energy sales is more equitable. No other allocation is reasonable in this case.

7 **“SPECIAL CONTRACT” CUSTOMERS EXEMPTION**

8 Q. Section 393.1700 RSMo provides, in pertinent part:

9 (16) "Securitized utility tariff charge", the amounts authorized by the commission
10 to repay, finance, or refinance securitized utility tariff costs and financing costs and
11 that are, except as otherwise provided for in this section, nonbypassable charges
12 imposed on and part of all retail customer bills, collected by an electrical
13 corporation or its successors or assignees, or a collection agent, in full, separate and
14 apart from the electrical corporation's base rates, and paid by all existing or future
15 retail customers receiving electrical service from the electrical corporation or its
16 successors or assignees under commission-approved rate schedules, **except for**
17 **customers receiving electrical service under special contracts as of**
18 **August 28, 2021**, even if a retail customer elects to purchase electricity from an
19 alternative electricity supplier following a fundamental change in regulation of
20 public utilities in this state;

21 ***

22 (19) **"Special contract", electrical service provided under the terms of a**
23 **special incremental load rate schedule at a fixed price rate approved by the**
24 **commission.**
25 **[emphasis added]**

26
27 Does Ameren Missouri currently serve any customers who qualify for exemption from
28 the SUTC due to “special contracts?”

29 A. No.

30 Q. Does Ameren Missouri assert that it has any “special contract” customers?

1 A. Yes. The direct testimony of Steve Wills at page 4, footnote 5 states
2 “The Company has two such special contracts, the customers that take service under which
3 would be excluded from receiving securitization charges”.

4 Q. Have you reviewed these contracts?

5 A. Yes.

6 Q. Did Ameren Missouri provide any evidence in its direct filing that these
7 contracts were "special contracts" for “electrical service provided under the terms of a special
8 incremental load rate schedule at a fixed price rate approved by the commission” as of
9 August 28, 2021, within the meaning of Section 393.1700, subsections (17) and (19)?

10 A. No.

11 Q. When was Section 393.1700 enacted?

12 A. Section 393.1700 was enacted in 2021.

13 Q. What is a “special incremental load rate schedule” within the meaning of
14 393.1700?

15 A. A special incremental load rate schedule refers to the very specific concept of a
16 below-cost-of-service rate that covered incremental cost, applicable to metal smelting facilities
17 or to new facilities with a demand of over fifty megawatts, and authorized by Section 393.355.

18 Q. Was the phrase “special incremental load rate” in common usage in 2021 and
19 before 2021?

20 A. Yes. Section 393.355, enacted in 2017 and amended in 2021, provided authority
21 for what was referred to in utility practice as a “special incremental load rate” although that
22 term is not expressly used in that statute. Section 393.355 is titled “Special rate for electrical

1 corporations authorized, when — net margin tracking mechanism — lower rate for facility,
2 when, duration,” and it authorizes the Commission to, inter alia:

3 ...approve a special rate, outside a general rate proceeding, that is not
4 based on the electrical corporation's cost of service for a facility if:

5 (1) The commission determines, but for the authorization of the
6 special rate the facility would not commence operations, the
7 special rate is in the interest of the state of Missouri when
8 considering the interests of the customers of the electrical
9 corporation serving the facility, considering the incremental cost
10 of serving the facility to receive the special rate, and the interests
11 of the citizens of the state generally in promoting economic
12 development, improving the tax base, providing employment
13 opportunities in the state, and promoting such other benefits to
14 the state as the commission may determine are created by
15 approval of the special rate.⁵

16 Additional language in the statute provides that “Notwithstanding the provisions of
17 section 393.170, an electrical corporation is authorized to provide electric service to a facility
18 at a special rate for the new or incremental load authorized by the commission: (1) Under a
19 rate schedule reflecting the special rate approved by the commission; or (2) If the facility is
20 located outside the electrical corporation's certificated service territory, the facility shall be
21 treated as if it is in the electrical corporation's certified service territory, subject to a
22 commission-approved rate schedule incorporating the special rate under the contract.”⁶

23 A tariff for service to Nucor, denominated “Special Rate for Incremental Load Service”
24 was submitted to the Commission on July 12, 2019, by the utility now known as
25 Evergy Missouri West.

26 Q. Was Section 393.355 known to the legislators enacting Section 393.1700?

⁵ 393.355.2.

⁶ 393.355.4.




1 A. Yes. The amendment of Section 393.355 and the enactment of Section 393.1700
2 were both accomplished through the passage of House Bill 734.

3 Q. Are the contracts for service to either customer referenced by Ameren Missouri
4 at a “fixed price rate approved by the commission” as required by Section 393.1700. (19)?

5 A. No. The contracts are not for service to smelters, are not for customers with
6 more than 50 MW of demand, and are not for service at a “fixed price rate approved by
7 the Commission”.

8 Q. What is the recent usage associated with these customers?

9 A. The table below provides recent usage, although Ameren’s response to Staff
10 DR 1 indicated that the usage for Customer 2 is expected to taper off.⁷

	Contract Customer 1	Contract Customer 2		
	Annual Average Usage	Annual Average Usage		
2020	189,540	1,901,310		
2021	165,785	1,916,379		
2022	191,300	1,899,234		
**				**

11
12 Q. Should this usage be excluded from the prospective billing determinants used to
13 calculate the SUTC rate?

14 A. No.
15

⁷ The written response to Staff DR 1 is attached as Schedule SLKL-r3HC. Attachments omitted.

“Special Contract” Customer 1

1
2 Q. What are the terms of Ameren Missouri’s service to Customer 1?

3 A.

**

[REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]. **

11 **

[REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]. **

16 Q. Is the Customer 1 contract for a “fixed price rate?”

17 A. No. The rate for energy is not fixed and changes in each and every
18 Ameren Missouri rate case in which Ameren Missouri’s rates change.

19 Q. Has the Customer 1 contract been “approved by the commission?”

20 A. Apparently not. In response to Staff data request 1.1, requesting “1. Provide the
21 designation of the Commission Docket in which service of each Special Contract was initially
22 authorized and provide the date of the relevant orders. 2. Provide the designations of any
23 subsequent Commission Dockets in which any amendments or other changes to each

1 Special Contract was authorized and provide the date of the relevant orders. 3. If available,
2 please provide a copy of each order for those orders not available in EFIS,” Mr. Wills responded
3 that “The Company has to this point in time been unable to identify dockets in which the
4 contracts or amendments were presented to the Commission for authorization. ** The terms of
5 both contracts, however, have been routinely incorporated in the determination of billing units
6 and normalized revenues by the Company and Staff and reflected in revenues used to develop
7 compliance rates consistent with Commission orders in Ameren Missouri rate cases for more
8 than the last decade”. **

9 **“Special Contract” Customer 2**

10 Q. What are the terms of Ameren Missouri’s service to Customer 2?⁸

11 A. ** [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] **. **
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

⁸ Ameren Missouri refers to usage by this customer as ** [REDACTED] **, and various derivatives of those names.

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[REDACTED]

** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Is the Customer 2 contract for a “fixed price rate”?

1 A. No. The rate for energy is not fixed, in that the rate changes in each and every
2 Ameren Missouri rate case in which Ameren Missouri's rates change.

3 Q. Has the Customer 2 contract been "approved by the commission?"

4 A. Apparently not. Please refer to the response to Staff data request 1.1,
5 discussed above.

6 **TARIFF RECOMMENDATION**

7 Q. Is Ameren Missouri's proposed tariff form identical to that stipulated-to by the
8 parties to Evergy Missouri West's SUTC case, EF-2022-0155?

9 A. No. Evergy Missouri West's tariff is attached as Schedule SLKS-r4.

10 Q. Had the now-promulgated form of the Liberty SUTC tariff resulting from File
11 Nos. EO-2022-0040 and EO-2022-0193 taken shape by the time Mr. Wills prefiled his direct
12 testimony in this case on November 21, 2023?

13 A. No. The substance of the Liberty tariff was not filed with the Commission until
14 January 9, 2024. The promulgated form of this tariff is attached as Schedule SLKS-r5.

15 Q. Is the proposed Ameren Missouri tariff most like the Evergy form or the
16 Liberty form?

17 A. The proposed Ameren Missouri tariff is most like the Evergy form.
18 A comparison of the substance of the two tariff specimens is attached as Schedule SLKS-r6.

19 Q. Are all necessary elements reflected in the Ameren Missouri tariff?

20 A. No. While the Ameren Missouri tariff needn't be identical to either Evergy's or
21 Liberty's tariff, there are three key features that are missing from the Ameren Missouri tariff.
22 Two features relate to clarification of what is meant by non-bypassability and one feature is a
23 minor clarification to "future-proof" the tariff.

1 Q. What is the provision related to future-proofing?

2 A. The tariff should include a clarifying statement that the voltage adjustments used
3 in the SUTC should be kept consistent with the voltage adjustments used in the FAC, in the
4 event that additional voltage service levels are introduced at some time over the life of the
5 SUTC. The wording in the Evergy tariff is provided below:

6 In the event more delineated voltage adjustments become implemented
7 in the Fuel Adjustment Clause, such service levels shall be incorporated
8 into this rider at the next true-up.

9 Q. Pursuant to statute, the imposition and collection of SUTC rates authorized
10 under a financing order shall be nonbypassable.⁹ What tariff provisions should be added to the
11 Ameren Missouri draft to reflect this statutory language?

12 A. The Ameren Missouri tariff should be modified to include (1) a statement that
13 the SUTC is non-bypassable in whole and in part, namely, that it cannot be discounted; and
14 clarification as to the applicability of the SUTC in the event of changes in utility service
15 territories or mergers.

16 Q. Do you have example language regarding the partial bypassability of the SUTC?

17 A. Yes. While other language could be acceptable, the wording in the Evergy tariff
18 is provided below as an example:

19 Inapplicability of Discounts – Charges under Schedule SUR are payable
20 in full and are not eligible for any discount.

21 Q. Do you have example language to clarify the applicability of the SUTC in the
22 event of changes in utility service territories or mergers?

23 A. Yes. The wording in the Evergy tariff is provided below as an example:

⁹ Section 393.1700. 2.(3)(c)d.

1 The Securitized Utility Tariff Rider will be applicable to customers
2 newly served by the Company due to organic growth within its existing
3 service territory or expansion of the Company's service territory by way
4 of a new certificate of convenience and necessity or a new territorial
5 agreement. The Securitized Utility Tariff Rider will not apply to
6 customers in other utility jurisdictions merged with, or acquired by, the
7 Company in the future. This charge will continue to be applicable to any
8 customers (new or existing) currently served by the Company, but
9 subsequently served by some other electric service provider as a result
10 of a territorial agreement or modification of a territorial agreement,
11 whether the other electric service provider is regulated by this
12 Commission or exempted from regulation by this Commission by any
13 current or future law. In such instance applicable kWh shall be included
14 in all applicable calculations contained herein.

15 Staff's Specimen Tariff generally incorporates this language with non-substantive
16 modifications to improve context and understandability, further described below.

17 Q. Pursuant to statute, the imposition and collection of SUTC rates authorized
18 under a financing order shall be nonbypassable. How does the statute address non-bypassability
19 of the SUTC?

20 A. The statute addresses non-bypassability three times. First, the SUTC is defined
21 as nonbypassable, in 393.1700.1.(16):

22 (16) "Securitized utility tariff charge", the amounts authorized by the
23 commission to repay, finance, or refinance securitized utility tariff costs
24 and financing costs and that are, except as otherwise provided for in this
25 section, nonbypassable charges imposed on and part of all retail
26 customer bills, collected by an electrical corporation or its successors or
27 assignees, or a collection agent, in full, separate and apart from the
28 electrical corporation's base rates, and paid by all existing or future retail
29 customers receiving electrical service from the electrical corporation or
30 its successors or assignees under commission-approved rate schedules,
31 except for customers receiving electrical service under special contracts
32 as of August 28, 2021, even if a retail customer elects to purchase
33 electricity from an alternative electricity supplier following a
34 fundamental change in regulation of public utilities in this state;

35 Second, there is a requirement that the financing order include a requirement that the
36 SUTC is nonbypassable, found in Section 393.1700. 2.(3)(c) d.

1 d. A requirement that, for so long as the securitized utility tariff bonds
2 are outstanding and until all financing costs have been paid in full, the
3 imposition and collection of securitized utility tariff charges authorized
4 under a financing order shall be nonbypassable and paid by all existing
5 and future retail customers receiving electrical service from the electrical
6 corporation or its successors or assignees under commission-approved
7 rate schedules except for customers receiving electrical service under
8 special contracts on August 28, 2021, even if a retail customer elects to
9 purchase electricity from an alternative electric supplier following a
10 fundamental change in regulation of public utilities in this state;

11 Finally, the Commission (and others) are prohibited from interfering with the non-
12 bypassability of the SUTC, in section 393.1700.11. (1) (a):

13 (a) Alter the provisions of this section, which authorize the commission
14 to create an irrevocable contract right or chose in action by the issuance
15 of a financing order, to create securitized utility tariff property, and make
16 the securitized utility tariff charges imposed by a financing order
17 irrevocable, binding, or nonbypassable charges for all existing and future
18 retail customers of the electrical corporation except its existing special
19 contract customers;

20 Q. Is tariff language necessary to guide the applicability of the SUTC under future
21 scenarios related to changes in the utility's certificated territory?

22 A. Yes. From time to time, utilities may request additional authority to serve a
23 larger geographic area, or to exchange certificated areas with another investor owned utility, a
24 municipal utility, or a cooperative utility. Further, utilities may merge or be acquired.
25 A well-designed tariff will include necessary details to guide the applicability of the SUTC to
26 customers and entities under each of these circumstances. In general, the SUTC must remain
27 non-bypassable, even if a premise or customer ceases service with Ameren Missouri and
28 initiates service with a different utility, whether or not regulated by this Commission.
29 However, in the event that an entire existing customer base of a different utility is merged with
30 the customer base of Ameren Missouri, it would not be appropriate for the separate customer
31 base to become responsible for the Ameren Missouri SUTC.

Sarah L.K. Lange

I received my J.D. from the University of Missouri, Columbia, in 2007, and am licensed to practice law in the State of Missouri. I received my B.S. in Historic Preservation from Southeast Missouri State University, and took courses in architecture and literature at Drury University. Since beginning my employment with the MoPSC I have taken courses in economics through Columbia College and courses in energy transmission through Bismarck State College, and have attended various trainings and seminars, indicated below.

I began my employment with the Commission in May 2006 as an intern in what was then known as the General Counsel's Office. I was hired as a Legal Counsel in September 2007, and was promoted to Associate Counsel in 2009, and Senior Counsel in 2011. During that time my duties consisted of leading major rate case litigation and settlement, and presenting Staff's position to the Commission, and providing legal advice and assistance primarily in the areas of depreciation, cost of service, class cost of service, rate design, tariff issues, resource planning, accounting authority orders, construction audits, rulemakings and workshops, fuel adjustment clauses, document management and retention, and customer complaints.

In July 2013 I was hired as a Regulatory Economist III in what is now known as the Tariff/ Rate Design Department. In this position my duties include providing analysis and recommendations in the areas of RTO and ISO transmission, rate design, class cost of service, tariff compliance and design, and regulatory adjustment mechanisms and tariff design. I also continue to provide legal advice and assistance regarding generating station and environmental control construction audits and electric utility regulatory depreciation. I have also participated before the Commission under the name Sarah L. Kliethermes.

Presentations

Midwest Energy Policy Series – Impact of ToU Rates on Energy Efficiency (August 14, 2020)

Billing Determinants Lunch and Learn (March 27, 2019)

Support for Low Income and Income Eligible Customers, Cost-Reflective Tariff Training, in cooperation with U.S.A.I.D. and NARUC, Addis Ababa, Ethiopia (February 23-26, 2016)

Fundamentals of Ratemaking at the MoPSC (October 8, 2014)

Ratemaking Basics (Sept. 14, 2012)

Participant in Missouri's Comprehensive Statewide Energy Plan working group on Energy Pricing and Rate Setting Processes.

**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)

File No. EF-2024-0021

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW SARAH L.K. LANGE, and on her oath states that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Sarah L.K. Lange*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange
SARAH L.K. LANGE

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 20th day of February 2024.

Dianna L. Vaughn
Notary Public

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377

Sarah L.K. Lange

I received my J.D. from the University of Missouri, Columbia, in 2007, and am licensed to practice law in the State of Missouri. I received my B.S. in Historic Preservation from Southeast Missouri State University, and took courses in architecture and literature at Drury University. Since beginning my employment with the MoPSC I have taken courses in economics through Columbia College and courses in energy transmission through Bismarck State College, and have attended various trainings and seminars, indicated below.

I began my employment with the Commission in May 2006 as an intern in what was then known as the General Counsel's Office. I was hired as a Legal Counsel in September 2007, and was promoted to Associate Counsel in 2009, and Senior Counsel in 2011. During that time my duties consisted of leading major rate case litigation and settlement, and presenting Staff's position to the Commission, and providing legal advice and assistance primarily in the areas of depreciation, cost of service, class cost of service, rate design, tariff issues, resource planning, accounting authority orders, construction audits, rulemakings and workshops, fuel adjustment clauses, document management and retention, and customer complaints.

In July 2013 I was hired as a Regulatory Economist III in what is now known as the Tariff/ Rate Design Department. In this position my duties include providing analysis and recommendations in the areas of RTO and ISO transmission, rate design, class cost of service, tariff compliance and design, and regulatory adjustment mechanisms and tariff design. I also continue to provide legal advice and assistance regarding generating station and environmental control construction audits and electric utility regulatory depreciation. I have also participated before the Commission under the name Sarah L. Kliethermes.

Presentations

Midwest Energy Policy Series – Impact of ToU Rates on Energy Efficiency (August 14, 2020)

Billing Determinants Lunch and Learn (March 27, 2019)

Support for Low Income and Income Eligible Customers, Cost-Reflective Tariff Training, in cooperation with U.S.A.I.D. and NARUC, Addis Ababa, Ethiopia (February 23-26, 2016)

Fundamentals of Ratemaking at the MoPSC (October 8, 2014)

Ratemaking Basics (Sept. 14, 2012)

Participant in Missouri's Comprehensive Statewide Energy Plan working group on Energy Pricing and Rate Setting Processes.

Relevant Trainings and Seminars

Regional Training on Integrated Distribution System Planning for Midwest/MISO Region
(October 13-15, 2020)

“Fundamentals of Utility Law” Scott Hempling lecture series (January – April, 2019)

Today’s U.S. Electric Power Industry, the Smart Grid, ISO Markets & Wholesale Power Transactions (July 29-30, 2014)

MISO Markets & Settlements training for OMS and ERSC Commissioners & Staff (January 27–28, 2014)

Validating Settlement Charges in New SPP Integrated Marketplace (July 22, 2013)

PSC Transmission Training (May 14 – 16, 2013)

Grid School (March 4–7, 2013)

Specialized Technical Training - Electric Transmission (April 18–19, 2012)

The New Energy Markets: Technologies, Differentials and Dependencies (June 16, 2011)

Mid-American Regulatory Conference Annual Meeting (June 5–8, 2011)

Renewable Energy Finance Forum (Sept. 29–Oct 3, 2010)

Utility Basics (Oct. 14–19, 2007)

Testimony and Staff Memoranda

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Requests for Customer Account Data Production from Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	E0-2024-0002
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request to Revise Its Solar Subscription Rider	EO-2023-0423 EO-2023-0424
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service	ER-2022-0337
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Certificates of Convenience and Necessity for Solar Facilities	EA-2023-0286
NextEra Energy Transmission Southwest, LLC In the Matter of the Application of NextEra Energy Transmission Southwest, LLC for a Certificate of Public Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a 345 kV Transmission Line and associated facilities in Barton and Jasper Counties, Missouri	EA-2022-0234
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	GR-2022-0179
Evergy Missouri West, Inc. dba Evergy Missouri West In the Matter of Evergy Missouri West, Inc. dba Evergy Missouri West for a Financing Order Authorizing the Financing of Extraordinary Storm Costs Through an Issuance of Securitized Utility Tariff Bonds	EF-2022-0155

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Evergy Metro, Inc. dba Evergy Missouri Metro Evergy Missouri West, Inc. dba Evergy Missouri West In the Matter of Evergy Metro, Inc. dba Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service. In the Matter of Evergy Missouri West, Inc. dba Evergy Missouri West's Request for Authority to Implement a General Rate Increase for Electric Service.	ER-2022-0129 ER-2022-0130
The Empire District Electric Company d/b/a Liberty In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Energy Transition Costs Related to the Asbury Plant	EO-2022-0193
The Empire District Electric Company d/b/a Liberty In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Qualified Extraordinary Costs	EO-2022-0040
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Convenience and Necessity Under Section 393.170 RSMo Relating to Transmission Investments in Southeast Missouri	EA-2022-0099
The Empire District Electric Company d/b/a Liberty In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area	ER-2021-0312
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service	ER-2021-0240
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Public Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a 138 kV Transmission Line and associated facilities in Perry and Cape Girardeau Counties, Missouri	EA-2021-0087
Evergy Affiliates In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of a Transportation	ET-2021-0151

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas	GR-2021-0108
Union Electric Company d/b/a Ameren Missouri In the Matter of the Request of Union Electric Company d/b/a Ameren for Approval of its Surge Protection Program	ET-2021-0082
Union Electric Company d/b/a Ameren Missouri In the Matter of the Request of Union Electric Company d/b/a Ameren Missouri to Implement the Delivery Charge Adjustment for the 1st Accumulation Period beginning September 1, 2019 and ending August 31, 2020	GT-2021-0055
The Empire District Electric Company In the Matter of The Empire District Electric Company's Tariffs Approval of a Transportation Electrification Portfolio for Electric Customers in its Missouri Service Area	ET-2020-0390
The Empire District Electric Company In the Matter of The Empire District Electric Company's Tariffs to Increase Its Revenues for Electric Service	ER-2019-0374
Union Electric Company d/b/a Ameren Missouri In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service	ER-2019-0335
KCP&L Greater Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company Request for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(8) And the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism	ER-2019-0413
Union Electric Company d/b/a Ameren Missouri In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Natural Gas Service	GR-2019-0077
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri Revised Tariff Sheets	ET-2019-0149
The Empire District Electric Company In the Matter of The Empire District Electric Company's Revised Economic Development	ET-2019-0029

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
The Empire District Electric Company In the Matter of a Proceeding Under Section 393.137 (SB 564) to Adjust the Electric Rates of The Empire District Electric Company	ER-2018-0366
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility	EA-2018-0202
Kansas City Power & Light Company KCP&L Greater Missouri Operations Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2018-0145 ER-2018-0146
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of Efficient Electrification Program	ET-2018-0132
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff	ET-2018-0063
Laclede Gas Company Laclede Gas Company d/b/a Missouri Gas Energy In the Matter of Laclede Gas Company's Request to Increase Its Revenue for Gas Service, In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase Its Revenue for Gas Service.	GR-2017-0215 GR-2017-0216
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0316
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0167
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Annual RESRAM	ET-2017-0097

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line	EA-2016-0358
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Side Investment Rider Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2016-0325
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service	ER-2016-0285
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Offer a Pilot Subscriber Solar Program and File Associated Tariff	EA-2016-0207
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	ER-2016-0179
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0156
Empire District Electric Company In the Matter of The Empire District Electric Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2016-0023
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri	EA-2015-0146

<u>Company</u>	<u>Case No.</u>
Eversource Energy, Inc. d/b/a Eversource Missouri Metro Eversource Missouri West, Inc. d/b/a Eversource Missouri West In the Matter of Eversource Energy, Inc. d/b/a Eversource Missouri Metro's and Eversource Missouri West, Inc. d/b/a Eversource Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Eversource Energy, Inc. d/b/a Eversource Missouri Metro Eversource Missouri West, Inc. d/b/a Eversource Missouri West In the Matter of the Joint Application of Eversource Energy, Inc. d/b/a Eversource Missouri Metro and Eversource Missouri West, Inc. d/b/a Eversource Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line in Marion County, Missouri and an Associated Switching Station Near Palmyra, Missouri	EA-2015-0145
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	EO-2015-0055
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service	ER-2014-0370
Empire District Electric Company In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area	ER-2014-0351
Union Electric Company d/b/a Ameren Missouri City of O'Fallon, Missouri, and City of Ballwin, Missouri, Complainants v. Union Electric Company d/b/a Ameren Missouri, Respondent	EC-2014-0316
Union Electric Company d/b/a Ameren Missouri In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service	ER-2014-0258
Union Electric Company d/b/a Ameren Missouri Noranda Aluminum, Inc., et al., Complainants, v. Union Electric Company d/b/a Ameren Missouri, Respondent	EC-2014-0224
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line	EA-2014-0207

<u>Company</u>	<u>Case No.</u>
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's and Evergy Missouri West, Inc. d/b/a Evergy Missouri West's Solar Subscription Rider Tariff Filings	ET-2024-0182
Evergy Metro, Inc. d/b/a Evergy Missouri Metro Evergy Missouri West, Inc. d/b/a Evergy Missouri West In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	ET-2024-0061
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Application for Authority to Establish a Renewable Energy Standard Rate Adjustment Mechanism	EO-2014-0151
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish A Demand-Side Programs Investment Mechanism	EO-2014-0095
Veolia Energy Kansas City, Inc. In the Matter of Veolia Energy Kansas City, Inc. for Authority to File Tariffs to Increase Rates	HR-2014-0066

SECURITIZED UTILITY TARIFF RIDER

Rider SUR

DESCRIPTION OF CHARGE

Rider SUR was authorized in Case No. EF-2024-0021 for the purpose of [LANGUAGE FROM ORDER]. A Special Purpose Entity ("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 charges under this Rider 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 SUR charge, separate and apart from the other rates, riders, and charges specified in the tariff of Company.

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 is the owner of the rights to charge and that Company is acting as servicer for the SPE.

Company, its successors or assignees, shall abide by this Rider SUR to accomplish collection of the amounts necessary to timely pay principal of, and interest on, the securitized utility tariff bonds and ongoing financing costs.

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 Company's next general rate case.

APPLICABILITY AND NON-BYPASSABILITY OF CHARGE

The charge described here-in is a non-bypassable charge applicable to each kWh provided to existing or future retail customers, even if a retail customer elects to purchase electricity from an alternative electricity supplier following a fundamental change in regulation of public utilities in Missouri, defined as follows:

Rider SUR will be applicable to customers newly served by the Company due to organic growth within its existing service territory or expansion of the Company's service territory by way of a new certificate of convenience and necessity or a new territorial agreement. Rider SUR will not apply to customers in other utility jurisdictions merged with, or acquired by, the Company after this rider's initial effective date. Charges as described in Rider SUR will continue to be applicable to any customers (new or existing) currently served by the Company, but subsequently served by some other electric service provider as a result of a territorial agreement or modification of a territorial agreement, whether the other electric service provider is regulated by this Commission or exempted from regulation by this Commission by any current or future law. In such instance applicable kWh shall be included in all applicable calculations contained herein. This rider 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.

Net Metering Customers:

For customers subject to billing under the Net-metering Easy Connection Act (Act), if the electricity supplied by Company exceeds the electricity generated by the customer-generator during a billing period, the customer-generator shall be billed at the Loss Adjusted SUTCR Rate applicable to each kWh as netted pursuant to the terms of the Act. If the electricity generated by the customer-generator exceeds the electricity supplied by Company during a billing period, the customer shall not be issued a credit based on the Loss Adjusted SUTCR Rate applicable to each kWh as netted pursuant to the terms of the Act, nor shall the Loss Adjusted SUTCR Rate charge be considered to be part of the avoided fuel cost of 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 Loss Adjusted SUTCR Rate shall be applicable to each kWh provided by the utility, without any offset.

Inapplicability of Discounts:

Charges under Rider SUR are payable in full and are not eligible for any discount.

Partial Payments:

If any customer does not pay the full amount it has been billed, the amount will be allocated first to the securitized utility tariff charges, unless a customer is in a repayment plan under the Commission's Cold Weather Rule, in which case payments will be prorated among charge categories in proportion to their percentage of the overall bill, with first dollars collected attributed to past due balances, if any.

RATE DETERMINATION

Rates under Rider SUR will be adjusted at least semi-annually in order to ensure that the expected collection of amounts authorized in Case No. EF-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.

Bond Payment Dates:

Bond payment dates are TBD and TBE, starting on TBD, and continue so long as the securitized utility tariff bonds are outstanding and until all costs have been paid in full.

Securitized Utility Tariff Charge Rate (SUTCR) Filing Procedure: Initial Rate Filing: With the filing of the Issuance Advice Letter Company shall submit a tariff sheet implementing the SUTCR for the AP ending TBD. For all other filings the SUTCR tariff sheet shall be submitted 45 days prior to the start of each APR. Concurrent with the filing of an SUTCR tariff sheet, or prior to such filing, Company shall prepare and file the information described on Sheet TBD under affidavit.

Rate Effective Date: The SUTCR shall be billed to customers starting with the start of each billing cycle associated with the first billing month following a SUTCR tariff sheet effective date.

Annual Payment Requirement Time Periods:

The mandatory Annual filing date will occur on or before [date that is at least 45 days prior to the TBD effective date], each year, to take effect TBD each year.

Period (12 months)*	Annual Payment Requirement Period
Initial Annual Payment Requirement Period	TBD*
Annual Payment Requirement Period 1	TBD
Annual Payment Requirement Period 2	TBD
Annual Payment Requirement Period 3	TBD
Annual Payment Requirement Period 4	TBD
Annual Payment Requirement Period 5	TBD
Annual Payment Requirement Period 6	TBD
Annual Payment Requirement Period 7	TBD
Annual Payment Requirement Period 8	TBD
Annual Payment Requirement Period 9	TBD
Annual Payment Requirement Period 10	TBD
Annual Payment Requirement Period 11	TBD
Annual Payment Requirement Period 12	TBD
Annual Payment Requirement Period 13	TBD

*The Initial Annual Payment Requirement Period is less than twelve months; those following are twelve months.

Annual Payment Requirement (APR):

The aggregate dollar amount of securitized utility tariff charges that must be billed during a given Annual Period, after giving effect to amounts on deposit in the Excess Funds subaccount at the time of calculation and that are projected to be available for payment at the end of such Annual Period and any variances as provided for in the mechanism in the Annual Payment Requirements for any prior Annual Periods so that the securitized utility tariff charge collections will be sufficient to meet the Annual Payment Requirement for each Bond Payment Date, including deficiencies of previously scheduled principal for any reason.

For the Annual Period (AP) ending [Initial APRP]:

$$APR = SUTBP_{AP} + PTC_{AP}$$

For APs ending [date of APRP2] through conclusion of the applicability of this Rider SUR:

$$APR = SUTBP_{AP} + PTC_{AP} + TCR_{AP} + TUR_{AP} + FUR_{AP}$$

SUTBP_{AP} - Securitized Utility Tariff Bond Payment is the principal amortization payment of the securitized utility tariff bonds in accordance with the amortization schedule plus the periodic interest on the securitized utility tariff bonds (including any accrued and unpaid interest) to be paid on each Bond Payment Dates.

PTC_{AP} – Projected Transaction Costs are the expected level of costs and expenses for administering this Rider SUR and servicing the bonds for each AP, including a projection of billing and collection lags between the collection of SUTC revenues and the payment of bond payments on each Bond Payment Date. Ongoing financing costs include items such as the servicing fees, rating agencies' fees, trustee fees, legal and accounting fees, other ongoing fees and expenses and applicable taxes to be paid on each Bond Payment Date during such APR Period.

TCR_{AP} – Transaction Cost Reconciliation is the difference between the transaction costs projected for AP_{N-1} and actual transaction costs experienced in AP_{N-1}.

TUR_{AP} - True Up Reconciliation Is the difference between (1) the total actual revenue expected to have been collected during AP_{N-1}, including any TUAs, and including an estimated revenue amount for Forecasted Usage and (2) the total revenue collected during AP_{N-1}, including an estimated revenue amount for Forecasted Usage, including the revenue collected pursuant to any TUAs.

FUR_{AP} - Forecasted Usage Reconciliation Is the difference between the revenue forecasted to be collected under the then-applicable SUTCs during AP_{N-2} and the revenue actually collected during the period for which usage was forecasted.

$$\text{SUTC}_{\text{at generation}} = (\text{APR} / \text{PU}_{\text{AP}}) + \sum (\text{TUA}_N)$$

PU_{AP} Projected Usage for Annual Period Is the forward-looking estimate of the weather normalized kWh assumed to be sold in a future AP inclusive of Forecasted Usage when initially calculating an SUTC prior to calculation of any TUA, adjusted to generation voltage, and adjusted for payment lags and collection lags of customers that will not timely pay bills. Collection lags will be based upon Company's most recent experience regarding collection of securitized utility tariff charges.

PU_{TUA} Projected Usage for an TUA is the forward-looking estimate of the weather normalized kWh assumed to be between the effective date of the tariff sheet implementing that TUA and the end of the AP inclusive of Forecasted Usage, as adjusted to generation voltage, and adjusted for payment lags and collection lags of customers that will not timely pay bills. Collection lags will be based upon Company's most recent experience regarding collection of securitized utility tariff charges.

Forecasted Usage is a forward-looking estimate of the weather normalized kWh at generation voltage which are assumed will be sold during the portion of a current AP which have not yet been billed. Generally, the usage for the calendar months of September, October, and November is contemplated to be forecast in each AP.

TUA_N- True-Up Adjustment – is a mandatory filing that will be made by the servicer at least semi-annually if the servicer forecasts undercollection, and may be made any time to correct any under collection or, as provided for in the Financing Order, in order to assure timely payment of securitized utility tariff bonds.

Further, the servicer must make a mandatory TUA semi-annually, and quarterly beginning 12 months prior to the final scheduled payment date of the last tranche of the securitized utility tariff bonds:

- (a) If the servicer estimates that securitized utility tariff charge collections will be insufficient to make all scheduled payments of principal, interest, and other amounts in respect of the securitized utility tariff bonds on a timely basis during the current or next succeeding semi-annual period; or
- (b) To replenish any draws upon the capital subaccount.

The TUA shall equal Company's estimate of such insufficiency (in \$'s) divided by the applicable PU_{TUA}.

Expansion Factors (VAF) – Shall be equal to the voltage adjustment factors in Company's then-effective Fuel Adjustment Clause (FAC) as approved in the most recent general rate case or in a proceeding conducted for modifying the Company's Expansion Factors. In the event more delineated voltage adjustments become implemented in the Fuel Adjustment Clause, such service levels shall be incorporated into this Rider at the next applicable adjustment.

VAF_{SEC} = Expansion factor for lower than primary voltage customer
 VAF_{PRIM} = Expansion factor for primary to High Voltage customer
 VAF_{HV} = Expansion factor for High Voltage to transmission voltage customer
 VAF_{TRNS} = Expansion factor for transmission voltage customer

Where: Secondary voltage is defined as the level of voltage at facilities at which electric power is taken or delivered, at a level up to 480 volts; Primary voltage is defined as the level of voltage at facilities at which electric power is taken or delivered, at a level between 2.4 kV and ?? kV; High voltage is defined as the level of voltage at facilities at which electric power is taken or delivered, at a level between ?? kV and 34 kV; and Transmission voltage is defined as any line with voltage at 34.5 kV and above.

1	Securitized Utility Tariff Bond Payment (SUTBP _{AP})		
2	Projected Transactions Costs (PTC _{AP})	+	
3	Transaction Cost Reconciliation (TCR _{AP})	+	
4	True-Up Reconciliation (TUR _{AP})	+	
5	Forecasted Usage Reconciliation (FUR _{AP})	+	
6	Annual Payment Requirement (APR) [Line 6 = Sum of Lines 1-5]	=	
7	Projected Usage (kWh) for Annual Period (PU _{AP})		
8	[Line 8 = Line 6 divided by Line 7]	=	
9	True-Up Adjustment Rate (TUA _N) Effective _____	+	
10	SUTCR _{at generation} [Line 10 = Line 8 + \sum of all TUAs in effect]	=	
Rider SUR Rates			
11	Secondary (SUTCR _{at generation} x VAF_{SEC} 1.0539) per kWh	=	
12	Primary (SUTCR _{at generation} x VAF_{PRIM} 1.0222) per kWh	=	
13	High Voltage (SUTCR _{at generation} x VAF_{HV} 1.059) per kWh	=	
14	Transmission (SUTCR _{at generation} x VAF_{TRNS} .9928) per kWh	=	

The Information
Contained In
Schedule SLKL d-3
Has Been Deemed
Confidential

EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 Original Sheet No. 168.1
Canceling P.S.C. MO. No. _____ Revised Sheet No. _____
For Missouri Retail Service Area

SECURITIZED UTILITY TARIFF RIDER
Schedule SUR

APPLICABILITY (continued)

Rates under this Schedule SUR will be adjusted no less frequently than annually in order to ensure that the expected collection of amounts authorized in Case No. EF-2022-0155 is 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. Schedule SUR rates shall be calculated by dividing the total securitized revenue requirement by the forecasted period projected sales at generation voltage and multiplied by the voltage expansion factor, as shown in the following formula:

$$SURRE_x = ((TSRR + CARP + \text{True-Up Amount}_{\text{NextRP}}) \div S_{RP}) \times VAF_x$$

where,

SURR = Schedule SUR Rate for the period, applicable to indicated VAF;

TSRR = Total Securitized Revenue Requirement shall consist of the following items:

1. Principal
2. Interest
3. Financing Costs inclusive of Servicing Fee, Administration Fee, Trustee's/Trustee's Counsel Fees and Expenses, Auditing/Accounting Fees, Legal Fees/Expenses for Company's/Issuer's Counsel, Rating Agency Surveillance Fees, Return on Capital Account, Printing/Edgarizing Fees, Independent Manager's Fees, and Miscellaneous.
5. Bad debts net of prior period collections.
6. For each of the above, separately, any variations calculated through a reconciliation of the current period TSRR actuals to the projections, forecasts, or estimates to the extent that actuals are available.

CARP = An allowance to the extent necessary to align revenue recovery with payment obligations. This allowance will be returned to ratepayers when no longer necessary;

S_{RP} = Forecasted recovery period retail sales to all applicable customers, at the generation level;

VAF_x = Expansion factor by voltage level¹

VAF_{Trans} = Expansion factor for transmission voltage customers

VAF_{Sub} = Expansion factor for substation to transmission voltage customers

¹In the event more delineated voltage adjustments become implemented in the Fuel Adjustment Clause, such service levels shall be incorporated into this rider at the next true-up.

EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 Original Sheet No. 168.2

Canceling P.S.C. MO. No. _____ Revised Sheet No. _____

For Missouri Retail Service Area

<p>VAF_{Prim} = Expansion factor for primary to substation voltage customers VAF_{Sec} = Expansion factor for lower than primary voltage customers</p> <p>SECURITIZED UTILITY TARIFF RIDER Schedule SUR</p>

RECOVERY PERIODS

“Recovery Period” (RP) means the period for which a given SURR tariff sheet is in effect. The initial Recovery Period shall begin on the effective date of the first tariff providing an effective SURR and conclude the day prior to the next occurring [Insert the first calendar day of 2 months 6 months apart to optimize operation in conjunction with payment dates]. Subsequent RPs will occur until all TSRR has been paid in full.

RPs will generally begin [INDICATED DATES], unless required to accommodate a True-Up, and will be 12 months in duration unless required to accommodate a True-Up. If an RP is less than 12 months in duration the Recovery Period Amount and related calculations shall be prorated accordingly.

To accommodate timing of SURR tariff sheet 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 subsequent SURRs, in subsequent SURR filings such projections will be reconciled against actual data as it becomes available.

TRUE-UP

The Company as servicer shall file proposed SURR tariff sheets implementing a True-Up and bearing a 30-day effective date, no less frequently than annually. At the servicer’s discretion, SURR tariff sheet filings implementing a True-Up may be made semi-annually, or more frequently, by tariff filing bearing a 30-day effective date. All supporting materials shall be included in such filings. Workpapers and necessary documentation supporting each element of the TSRR shall be included under affidavit with each SURR tariff sheet filing. If cost to Evergy to perform its servicing and administrative services under the Servicing Agreement and the Administration Agreement is less than what the Company is paid for those services, then that difference in cost shall be tracked by Evergy and included in a regulatory liability account to be addressed in Evergy’s next general rate case.

The Company shall time the tariff filing such that the effective date of the tariff is the first day of a calendar month.

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

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EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 Original Sheet No. 168.3
Canceling P.S.C. MO. No. _____ Revised Sheet No. _____
For Missouri Retail Service Area

SECURITIZED UTILITY TARIFF RIDER
Schedule SUR

TRUE-UP AND SURR TARIFF SHEET FILING FORMULA

$$\text{True-Up Amount}_{\text{NextRP}} = \text{Periodic Payment Requirement}_{\text{Current RP}} - \text{SUTC Remittances}_{\text{CurrentRP}}$$

Where;

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

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

To accommodate timing of SURR tariff sheet 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 subsequent SURRs, in subsequent SURR 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 the projections, forecasts, or estimates to the extent that actuals are available. The Company will provide its best available S_{RP} forecast, and all supporting information.

To accommodate RPs of varying lengths and true-up of projected data, S_{RP} forecasts by calendar month relied upon for SURR tariff sheet calculation shall be provided to Staff and retained by the Company.

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EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

P.S.C. MO. No. 1 Original Sheet No. 168.4

Canceling P.S.C. MO. No. _____ Revised Sheet No. _____

For Missouri Retail Service Area

**SECURITIZED UTILITY TARIFF RIDER
Schedule SUR**

ADDITIONAL TERMS

1. Treatment of partial payments on customer bills – the first dollars collected would 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 charges under Schedule SUR shall be prorated with other amounts due for that given 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 to the applicable SURR 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 generated by the customer-generator during a billing period, the customer shall not be issued a credit based on the SURR applicable to each kWh as netted pursuant to the terms of the Act and this tariff, nor shall the SURR 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 SURR shall be applicable to each kWh provided by the Company, without any offset.
3. Inapplicability of Discounts – Charges under Schedule SUR are payable in full and are not eligible for any discount.

4. Filing Procedure

Initial Rate Filing:

In accordance with the provisions of sections 393.1700.2(3)(c)i and 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 bearing a proposed effective date being 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.

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EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST

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 For Missouri Retail Service Area

<p>SECURITIZED UTILITY TARIFF RIDER Schedule SUR</p>

SECURITIZED REVENUE REQUIREMENT AND SUR RATE

These rates shall apply to the Billing Months on and after [NAME OF CALENDAR MONTH FOLLOWING SHEET EFFECTIVE DATE].

EXAMPLE LINE NAMES AND AMOUNTS

[AFTER INITIAL FILING, ALTERNATE BETWEEN TWO SHEETS TO MAINTAIN PRESENCE IN TARIFF OF EFFECTIVE RATES DURING OVERLAP MONTH]

1	Principal and Interest		\$0
2	Prior Securitized Revenue Requirement True-Up Amount	+	\$0
3	Other Financing Costs	+	\$0
4	Total Securitized Revenue Requirement	=	\$0
5	Forecasted Sales at Generation Level (SRP) for [INSERT DATES]	÷	0
6	SUR Rate	=	\$0
	Loss Adjusted SUR Rates		
7	Secondary (SUR Rate x VAF _{Sec} 1.0426) per kWh	=	\$0
8	Primary (SUR Rate x VAF _{Prim} 1.0268) per kWh	=	\$0
9	Substation (SUR Rate x VAF _{Sub} 1.0133) per kWh	=	\$0
10	Transmission (SUR Rate x VAF _{Trans} 1.0100) per kWh	=	\$0

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THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE RIDER SUTC- February 2021 Storm & Asbury Costs

Applicability and Non-Bypassability of Charge

The Securitized Utility Tariff Charge (SUTC or the “charge”) described here-in is a non-bypassable charge for February 2021 Storm & Asbury costs applicable to each kWh provided to existing or future retail customers in Missouri receiving electrical service under Commission-approved rate schedules from Liberty, its successors, or assignees, even if a retail customer elects to purchase electricity from an alternative electricity supplier following a fundamental change in regulation of public utilities in Missouri.

This SUTC was authorized by the Commission in Case No. EO-2022-0040 and EO-2022-0193 under RSMo Section 393.1700 providing for the issuance by the Special Purpose Entity (SPE) of securitized utility tariff bonds to finance the amount of Securitized Utility Tariff Costs and financing costs (Financing Costs) determined by the Commission in the Amended Report and Order dated September 22, 2022 (the Financing Order) for February 2021 Storm & Asbury Costs.

As provided in the Financing Order, the rights to bill, collect and adjust the SUTC have been sold to Empire District BondCo LLC (Bond Co), which will pledge such rights to the repayment of the principal of and interest on \$305,490,000 of securitized utility tariff bonds and ongoing financing costs. The SUTC will be initially set and adjusted from time-to-time in accordance with this tariff to collect amounts sufficient to pay debt service on the securitized utility tariff bonds and ongoing financing costs, as the same becomes due, as more fully explained below.

In the event that the certificated territory defined within this tariff book becomes combined through merger or acquisition or other corporate action with territory defined within another regulated utility’s tariff book, this charge shall be applicable only to the territory defined within this tariff book immediately prior to such combination. In the event the territory defined within this tariff book is modified by territorial agreement, granting of new Certificate of Convenience and Necessity, or modification of the existing Certificate of Convenience and Necessity, this charge will become applicable to any new customers or premises acquired. The SUTC will continue to be applicable to any customers or premises (new or existing) currently served by Liberty, but subsequently served by some other electric service provider as a result of a territorial agreement or modification of a territorial agreement, whether the other electric service provider is regulated by this Commission or exempted from regulation by this Commission by any current or future law. In such instance applicable kWh shall be included in all applicable calculations contained herein.

The SUTC will be identified on each customer’s bill as a separate line item stating, “February 2021 Storm and Asbury Costs” and include both the rate and the amount of the charge on each bill. Each customer bill shall include a statement to the effect that BondCo, is the owner of the rights to securitized utility tariff charges and that Liberty is acting as servicer for BondCo. On each bill, the SUTC charge will be calculated as the then-applicable Securitized Utility Tariff Charge Rate (SUTCRR) multiplied by the applicable VAF, and multiplied by that customer’s applicable usage.

Collection and Ownership of Charge

This charge is to be collected by Liberty, its successors or assignees, or a collection agent, in full, separate and apart from the other rates, riders, and charges specified in Liberty’s tariff book. Ownership of the revenues produced by the rates designed to recover this charge will reside with BondCo, or its successors or assignees, as applicable.

Securitized Utility Tariff Recovery Mechanism:

Liberty, its successors or assignees, shall abide by this SUTC Rider to accomplish collection of the amounts necessary to timely pay principal of, and interest on, the securitized utility tariff bonds and ongoing financing costs.

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THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26a

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE RIDER SUTC- February 2021 Storm & Asbury Costs

Bond Payment Dates:

Bond payment dates are January 1 and July 1, starting on January 1, 2025, and continue so long as the securitized utility tariff bonds are outstanding and until all costs have been paid in full.

Securitized Utility Tariff Charge Rate (SUTC) Filing Procedure: Initial Rate Filing: With the filing of the Issuance Advice Letter Liberty shall submit a tariff sheet implementing the SUTC for the AP ending November 30, 2024. For all other filings the SUTC tariff sheet shall be submitted 45 days prior to the start of each APR. Concurrent with the filing of an SUTC tariff sheet, or prior to such filing, Liberty shall prepare and file the information described on Sheet 26e under affidavit.

Rate Effective Date: The SUTC shall be billed to customers starting with the start of each billing cycle associated with the first billing month following a SUTC tariff sheet effective date.

Partial Payments:

If any customer does not pay the full amount it has been billed, the amount will be allocated first to the securitized utility tariff charges, unless a customer is in a repayment plan under the Commission's Cold Weather Rule, in which case payments will be prorated among charge categories in proportion to their percentage of the overall bill, with first dollars collected attributed to past due balances, if any.

Net Metering Rates:

For customers subject to billing under the Net-metering Easy Connection Act (Act), if the electricity supplied by Liberty exceeds the electricity generated by the customer-generator during a billing period, the customer-generator shall be billed at the Loss Adjusted SUTC Rate applicable to each kWh as netted pursuant to the terms of the Act. If the electricity generated by the customer-generator exceeds the electricity supplied by Liberty during a billing period, the customer shall not be issued a credit based on the Loss Adjusted SUTC Rate applicable to each kWh as netted pursuant to the terms of the Act, nor shall the Loss Adjusted SUTC Rate charge be considered to be part of the avoided fuel cost of Liberty 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 Loss Adjusted SUTC Rate shall be applicable to each kWh provided by the utility, without any offset.

THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26b

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE RIDER SUTC- February 2021 Storm & Asbury Costs

Annual Payment Requirement Time Periods:

The mandatory Annual filing date will occur on or before October 15th, each year, to take effect on December 1st each year.

Period (12 months)	Annual Payment Requirement Period
Initial Annual Payment Requirement Period	March 1, 2024 – November 30, 2024*
Annual Payment Requirement Period 1	December 1, 2024 – November 30, 2025
Annual Payment Requirement Period 2	December 1, 2025 – November 30, 2026
Annual Payment Requirement Period 3	December 1, 2026 – November 30, 2027
Annual Payment Requirement Period 4	December 1, 2027 – November 30, 2028
Annual Payment Requirement Period 5	December 1, 2028 – November 30, 2029
Annual Payment Requirement Period 6	December 1, 2029 – November 30, 2030
Annual Payment Requirement Period 7	December 1, 2030 – November 30, 2031
Annual Payment Requirement Period 8	December 1, 2031 – November 30, 2032
Annual Payment Requirement Period 9	December 1, 2032 – November 30, 2033
Annual Payment Requirement Period 10	December 1, 2033 – November 30, 2034
Annual Payment Requirement Period 11	December 1, 2034 – November 30, 2035
Annual Payment Requirement Period 12	December 1, 2035 – November 30, 2036
Annual Payment Requirement Period 13	December 1, 2036 – November 30, 2037

*The Initial Annual Payment Requirement Period is less than twelve months; those following are twelve months.

Annual Payment Requirement (APR):

The aggregate dollar amount of securitized utility tariff charges that must be billed during a given Annual Period, after giving effect to amounts on deposit in the Excess Funds subaccount at the time of calculation and that are projected to be available for payment at the end of such Annual Period and any variances as provided for in the mechanism in the Annual Payment Requirements for any prior Annual Periods so that the securitized utility tariff charge collections will be sufficient to meet the Annual Payment Requirement for each Bond Payment Date, including deficiencies of previously scheduled principal for any reason.

For the Annual Period (AP) ending November 30, 2024:

$$APR = SUTBP_{AP} + PTC_{AP}$$

For APs ending November 30, 2025 through conclusion of the applicability of this SUTC Rider:

$$APR = SUTBP_{AP} + PTC_{AP} + TCR_{AP} + TUR_{AP} + FUR_{AP}$$

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THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26c

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE RIDER SUTC- February 2021 Storm & Asbury Costs

SUTBP_{AP} - Securitized Utility Tariff Bond Payment is the principal amortization payment of the securitized utility tariff bonds in accordance with the amortization schedule plus the periodic interest on the securitized utility tariff bonds (including any accrued and unpaid interest) to be paid on each Bond Payment Dates.

PTC_{AP} – Projected Transaction Costs are the expected level of costs and expenses for administering this SUTC Rider and servicing the bonds for each AP, including a projection of billing and collection lags between the collection of SUTC revenues and the payment of bond payments on each Bond Payment Date. Ongoing financing costs include items such as the servicing fees, rating agencies’ fees, trustee fees, legal and accounting fees, other ongoing fees and expenses and applicable taxes to be paid on each Bond Payment Date during such APR Period.

TCR_{AP} – Transaction Cost Reconciliation is the difference between the transaction costs projected for AP_{N-1} and actual transaction costs experienced in AP_{N-1}.

TUR_{AP} - True Up Reconciliation Is the difference between (1) the total actual revenue expected to have been collected during AP_{N-1}, including any TUAs, and including an estimated revenue amount for Forecasted Usage and (2) the total revenue collected during AP_{N-1}, including an estimated revenue amount for Forecasted Usage, including the revenue collected pursuant to any TUAs.

FUR_{AP} - Forecasted Usage Reconciliation Is the difference between the revenue forecasted to be collected under the then-applicable SUTCs during AP_{N-2} and the revenue actually collected during the period for which usage was forecasted.

$$\text{SUTC}_{\text{at generation}} = (\text{APR} / \text{PU}_{\text{AP}}) + \sum (\text{TUA}_N)$$

PU_{AP} Projected Usage for Annual Period Is the forward-looking estimate of the weather normalized kWh assumed to be sold in a future AP inclusive of Forecasted Usage when initially calculating an SUTC prior to calculation of any TUA, adjusted to generation voltage, and adjusted for payment lags and collection lags of customers that will not timely pay bills. Collection lags will be based upon Liberty’s most recent experience regarding collection of securitized utility tariff charges.

PU_{TUA} Projected Usage for an TUA is the forward-looking estimate of the weather normalized kWh assumed to be between the effective date of the tariff sheet implementing that TUA and the end of the AP inclusive of Forecasted Usage, as adjusted to generation voltage, and adjusted for payment lags and collection lags of customers that will not timely pay bills. Collection lags will be based upon Liberty’s most recent experience regarding collection of securitized utility tariff charges.

Forecasted Usage is a forward-looking estimate of the weather normalized kWh at generation voltage which are assumed will be sold during the portion of a current AP which have not yet been billed. Generally, the usage for the calendar months of September, October, and November is contemplated to be forecast in each AP.

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THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26d

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE RIDER SUTC- February 2021 Storm & Asbury Costs

TUAN- True-Up Adjustment – is a mandatory filing that will be made by the servicer at least semi-annually if the servicer forecasts undercollection, and may be made any time to correct any under collection or, as provided for in the Financing Order, in order to assure timely payment of securitized utility tariff bonds.

Further, the servicer must make a mandatory TUA semi-annually, and quarterly beginning 12 months prior to the final scheduled payment date of the last tranche of the securitized utility tariff bonds:

- (a) If the servicer estimates that securitized utility tariff charge collections will be insufficient to make all scheduled payments of principal, interest, and other amounts in respect of the securitized utility tariff bonds on a timely basis during the current or next succeeding semi-annual period; or
- (b) To replenish any draws upon the capital subaccount.

The TUA shall equal Liberty's estimate of such insufficiency (in \$'s) divided by the applicable PU_{TUA} .

Expansion Factors (VAF) – Shall be equal to the voltage adjustment factors in Liberty's then-effective Fuel Adjustment Clause (FAC) as approved in the most recent general rate case or in a proceeding conducted for modifying the Company's Expansion Factors

VAF_{SEC} = Expansion factor for lower than primary voltage customer

VAF_{PRIM} = Expansion factor for primary to transmission voltage customer

VAF_{TRNS} = Expansion factor for transmission voltage customer

Secondary Voltage: Secondary voltage is defined as the level of voltage at facilities at which electric power is taken or delivered, at a level up to 480 volts.

Primary Voltage: Primary voltage is defined as the level of voltage at facilities at which electric power is taken or delivered, at a level between 2.4 kV and 34 kV.

Transmission Voltage: Transmission voltage is defined as any line with voltage at 34.5 kV and above.

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THE EMPIRE DISTRICT ELECTRIC COMPANY d.b.a. LIBERTY

P.S.C. Mo. No. 6 Sec. 4 Original Sheet No. 26e

Canceling P.S.C. Mo. No. _____ Sec. _____ Original Sheet No. _____

For ALL TERRITORY

SECURITIZED UTILITY TARIFF CHARGE
RIDER SUTC- February 2021 Storm & Asbury Costs

1	Securitized Utility Tariff Bond Payment (SUTBP _{AP})		29,993,350
2	Projected Transactions Costs (PTC _{AP})	+	2,612,173
3	Transaction Cost Reconciliation (TCR _{AP})	+	
4	True-Up Reconciliation (TUR _{AP})	+	
5	Forecasted Usage Reconciliation (FUR _{AP})	+	
6	Annual Payment Requirement (APR) [Line 6 = Sum of Lines 1-5]	=	32,605,523
7	Projected Usage (kWh) for Annual Period (PU _{AP})		3,307,583,200
8	[Line 8 = Line 6 divided by Line 7]	=	0.009858
9	True-Up Adjustment Rate (TUA _N) Effective _____	+	
10	SUTC _{R at generation} [Line 10 = Line 8 + \sum of all TUAs in effect]	=	0.009858
Loss Adjusted SUTC _R Rates			
11	Secondary (SUTC _{R at generation} x VAF _{SEC} 1.06250) per kWh	=	0.010474
12	Primary (SUTC _{R at generation} x VAF _{PRIM} 1.04286) per kWh	=	0.010280
13	Transmission (SUTC _{R at generation} x VAF _{TRNS} 1.02099) per kWh	=	0.010065

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SECURITIZED UTILITY TARIFF RIDER
Rider SUR

APPLICABILITY

~~The Securitized Utility Tariff Rider is collection of securitized utility tariff charges authorized under a non-bypassable charge financing order shall be nonbypassable and~~ paid by all existing ~~or~~ and future retail customers receiving electrical service from ~~an electrical corporation~~ 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 ~~electricity~~ electric supplier following a fundamental change in regulation of public utilities in ~~Missouri~~ this state.

~~The Securitized Utility Tariff Rider will be applicable to customers newly served by the Company due to organic growth within its existing service territory or expansion of the Company's service territory by way of a new certificate of convenience and necessity or a new territorial agreement. The Securitized Utility Tariff Rider will not apply to customers in other utility jurisdictions merged with, or acquired by, the Company in the future. This charge will continue to be applicable to any customers (new or existing) currently served by the Company, but subsequently served by some other electric service provider as a result of a territorial agreement or modification of a territorial agreement, whether the other electric service provider is regulated by this Commission or exempted from regulation by this Commission by any current or future law. In such instance applicable kWh shall be included in all applicable calculations contained herein.~~

~~The~~ 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 ~~as of on~~ August 28, 2021. Charges pursuant to this ~~Schedule~~ 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. ~~Schedule 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.

~~Schedule SUR was authorized in Case No. EF-2022-0155, The Petition of Evergy Missouri West, Inc. d/b/a Evergy Missouri West for a Financing Order Authorizing the Financing of Qualified Extraordinary Storm Costs Through an Issuance of Securitized Utility Tariff Bonds. A Special Purpose Entity ("SPE"),~~ 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.

APPLICABILITY (continued)

SECURITIZED UTILITY TARIFF RIDER
Rider SUR

RATE DETERMINATION

Rates under this ~~Schedule~~ Rider SUR will be adjusted ~~no less frequently than at least semi-annually~~ in order to ensure that the expected collection of amounts authorized in Case No. ~~EF-2022-0155 is~~ 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. ~~Schedule~~ SUR rates shall be calculated by dividing the total securitized revenue requirement by the forecasted period projected sales at generation voltage and multiplied by the voltage expansion factor, as shown in the following formula:

~~SURR_x = 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:~~

$$\text{SUR}_x = ((\text{TSRR} + \text{CA}_{\text{RP}} + \text{True Up Amount}_{\text{NextRP}} \text{ T} + \text{A}) \div \text{SRP}) \times \text{VAF}_x$$

where:

~~SUR = Schedule _____ SUR_x = _____ Rider SUR Rate for the period, applicable to indicated VAF;~~

~~TSRR = _____ Total Securitized Revenue Requirement shall consist of the following items: 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:~~

- ~~1. Principal~~
- ~~2. Interest~~
- ~~3. Financing Costs inclusive of Servicing Fee, Administration Fee, Trustee's/Trustee's Counsel Fees and Expenses, Auditing/Accounting Fees, Legal Fees/Expenses for Company's/Issuer's Counsel, Rating Agency Surveillance Fees, Return on Capital Account, Printing/Edgarizing Fees, Independent Manager's Fees, and Miscellaneous.~~
- ~~5. Bad debts net of prior period collections.~~
- ~~6. For each of the above, separately, any variations calculated through a reconciliation of the current period TSRR actuals to the projections, forecasts, or estimates to the extent that actuals are available.~~

~~CA_{RP} = _____ 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 ~~ratepayers when no longer necessary~~ customers as a credit periodically to reduce the charge;~~

~~S_{RP} = Forecasted recovery period retail sales to all applicable customers, at the~~

~~generation level; VAF_x = Expansion factor by voltage level¹~~

~~VAF_{Trans} = _____ 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);~~

¹In the event more delineated voltage adjustments become implemented in the Fuel Adjustment Clause, such service levels shall be incorporated into this rider at the next true-up.

SECURITIZED UTILITY TARIFF RIDER
Rider SUR

VAF_x = Expansion factor by voltage level
VAF_{Sec} = Expansion factor for ~~transmission voltage customers~~ Secondary Voltage Service
VAF_{Sub} = VAF_{Prim} = Expansion factor for ~~substation to transmission voltage customers~~
VAF_{Prim} = Primary Voltage Service
VAFHV = Expansion factor for ~~primary to substation voltage customers~~ VAF_{Sec} = High Voltage Service

VAF_{Trans} = Expansion factor for ~~lower than primary voltage customers~~ Transmission Voltage Service

RECOVERY PERIODS

“Recovery Period” (RP) means the period for which a given ~~SURR tariff sheet~~ SUR Rate is in effect. The initial Recovery Period shall begin on the effective date of the first tariff providing an effective ~~SURR~~ SUR Rate, and conclude the day prior to the next occurring ~~[Insert the first calendar day of 2 months 6 months apart to optimize operation in conjunction with payment dates].~~ Subsequent RPs will occur subsequent RP until all the TSRR has been paid in full.

RPs will generally ~~begin [INDICATED DATES], unless required to accommodate a True-Up, and will be 126 months in duration unless 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 ~~126~~ months in duration, the recovery period ~~Amount~~ amounts for the components of the SUR Rate determination and related calculations shall be ~~prorated~~ adjusted accordingly.

To accommodate timing of ~~SURR tariff sheet~~ 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 ~~subsequent SURR~~ SUR Rates, in subsequent ~~SURR~~ 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 ~~SURR tariff sheets~~ Rider SUR Rates implementing a True-Up ~~and bearing a 30-day effective date, no less frequently than annually.~~ At the servicer’s discretion, ~~SURR tariff sheet~~ SUR Rate filings implementing a True-Up may be made ~~semi-annually, or more frequently, by tariff filing bearing as necessary with~~ a 30-day effective date. ~~All supporting materials shall be included in such filings.~~ Workpapers and necessary documentation supporting each element of the TSRR shall be included under affidavit with each ~~SURR tariff sheet~~ filing. ~~If cost to Evergy to perform its servicing and administrative services under SUR Rate filing. At the Servicing Agreement and the Administration Agreement is less than what the Company is paid for those services, then that difference in cost shall be tracked by Evergy and included in a regulatory liability account to be addressed in Evergy’s next general rate case.~~

~~The Company shall time the tariff filing such that the effective date of the tariff is the first day~~ 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 a calendar month the current period TSRR actuals to estimates to the extent that actuals are available.

~~SURR tariff sheet~~ Rate filings implementing a True-Up and incorporating revised ~~SURR~~ SUR 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 AND SURR TARIFF SHEET FILING FORMULA

True Up Amount_{NextRP} = Periodic Payment Requirement_{Current RP} – SUTC Remittances_{Current RP} ~~where;~~
where:

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

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

To accommodate timing of ~~SURR tariff sheet~~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

~~subsequent SURRs~~SUR Rates, in subsequent ~~SURRSUR 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 ~~the projections, forecasts, or estimates~~ to the extent that actuals are available. ~~The Company will provide its best available SRP forecast, and all supporting information.~~

~~To accommodate RPs of varying lengths and true-up of projected data, SRP forecasts by calendar month relied upon for SURR tariff sheet calculation shall be provided to Staff and retained by the Company.~~

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 would 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 Schedule Rider SUR shall be prorated with other amounts based on the relative proportion of those SUR charges to the total amount due for utility service in that given 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 to the applicable SURRSUR 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 generated supplied to by the customer-generator Company during a billing period, the customer shall not be issued a credit based on the SURRSUR Rate applicable to each kWh as netted pursuant to the terms of the Act and this tariff, nor shall the SURRSUR 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 SURRSUR Rate shall be applicable to each kWh provided by the Company, without any offset.

~~4. Inapplicability of Discounts – Charges under Schedule SUR are payable in full and are not eligible for any discount.~~

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 sections 393.1700.2(3)(e) and 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 sheets bearing a proposed effective date being, 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.

~~SECURITIZED REVENUE REQUIREMENT AND UTILITY TARIFF RIDER
SUR RATE~~

~~These rates shall apply~~

~~Calculation of Current Securitized Utility Tariff Rate~~

~~Applicable to the Billing Month service provided on and after [NAME OF CALENDAR MONTH FOLLOWING SHEET [EFFECTIVE DATE] through [End date of RP].~~

~~EXAMPLE LINE NAMES AND AMOUNTS~~

~~{AFTER INITIAL FILING, ALTERNATE BETWEEN TWO SHEETS TO MAINTAIN PRESENCE IN TARIFF OF EFFECTIVE RATES DURING OVERLAP MONTH}~~

1	Principal and Interest		\$0
2	Prior Securitized Revenue Requirement True-Up Amount	+	\$0
3	Other Financing Costs	+	\$0
4	Total Securitized Revenue Requirement	=	\$0
5	Forecasted Sales at Generation Level (SRP) for [INSERT DATES]	=	0
6	SUR Rate	=	\$0
	Loss Adjusted SUR Rates		
7	Secondary (SUR Rate \times VAF_{Sec} 1.0426) per kWh	=	\$0
8	Primary (SUR Rate \times VAF_{Prim} 1.0268) per kWh	=	\$0
9	Substation (SUR Rate \times VAF_{Sub} 1.0133) per kWh	=	\$0
10	Transmission (SUR Rate \times VAF_{Trans} 1.0100) per kWh	=	\$0

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 (SRP)	÷	XX,XXX,XXX,XXX	
SUR Rate	=	\$X.XXXXXX/kWh	

Loss Adjusted SUR Rates

Secondary Voltage Adjustment Factor(VAFSEC)		1.0539
Secondary (SUR Rate x VAFSEC)	=	\$X.XXXXXX/kWh

Primary Voltage Adjustment Factor(VAFPRI)		1.0222
Primary (SUR Rate x VAFPRI)	=	\$X.XXXXXX/kWh

High Voltage Adjustment Factor(VAFHV)		1.0059
Substation (SUR Rate x VAFHV)	=	\$X.XXXXXX/kWh

Transmission Adjustment Factor(VAFTRANS)		.9928
Transmission (SUR Rate x VAFTRANS)	=	\$X.XXXXXX/kWh