

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

RESPONSE TO COMMISSION ORDER OF JUNE 7, 2024

COMES NOW Staff of the Missouri Public Service Commission and hereby files the following response to the Commission’s *Order Directing Response* (“Order”) dated June 7, 2024:

1. Based on the assumptions reflected in the Order, the total amount¹ to be securitized² if the Rush Island plant is retired September 1, 2024 is \$470,172,657, and the total amount to be securitized if the Rush Island plant is retired October 15, 2024 is \$467,644,988.

2. Based on the assumptions reflected in the Order, the total amount of Rush Island energy transition costs if the Rush Island plant is retired September 1, 2024 is \$463,935,800, and the total amount of Rush Island energy transition costs if the Rush Island plant is retired October 15, 2024 is \$ 461,418,810.

3. Based on the assumptions reflected in the Order, the total amount of Rush Island upfront financing costs if the Rush Island plant is retired September 1, 2024

¹ Upfront costs are based on estimates received from Ameren and are to be reviewed by the Finance Team through the pre-issuance review process and Commission review through the IAL process. Certain amounts are illustrated on the attached using an illustrative securitization cost of 5.59% as outlined in schedule KN-2 of the EF-2024-0021 Niehaus Testimony, which is calculated as of November 8, 2023. These items will be adjusted for the actual amounts or latest estimates on the date of issuance and reflect the terms of the issuance.

² Base mat coal inventory figure included is not rounded, as reflected on attached.

is \$6,236,857, and the total amount of Rush Island upfront financing costs if the Rush Island plant is retired October 15, 2024 is \$6,226,178.

4. Calculations of the foregoing amounts are reflected in the attachments hereto.

5. The Order directed Staff to work with the parties to develop this filing, but also ordered Staff to make this filing no later than June 12, 2024. Staff worked with Ameren Missouri in developing this filing but, due to time constraints and the press of business, was unable to include all other parties. Staff circulated the filing to the other parties, but given the filing deadline cannot say that all parties (including Ameren Missouri) agree with the calculations.

WHEREFORE, Staff respectfully requests the Commission accept this response and attachments in compliance with the Commission's *Order Directing Response* dated June 7, 2024.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 12th day of June 2024.

/s/ Jeffrey A. Keevil

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

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW KIMBERLY K. BOLIN, and on her oath states that she is of sound mind and lawful age; that she contributed to the foregoing *Response to Commission Order*; and that the same is true and correct according to her best knowledge and belief.

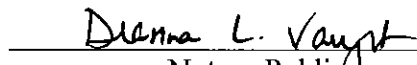
Further the Affiant sayeth not.



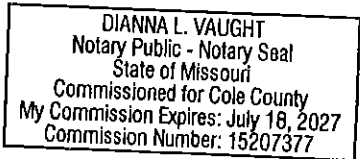
KIMBERLY K. BOLIN

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 11th day of June 2024.



Notary Public



**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 KEITH MAJORS

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

COMES NOW KEITH MAJORS, and on his oath states that he is of sound mind and lawful age; that he contributed to the foregoing *Response to Commission Order*; and that the same is true and correct according to his best knowledge and belief.

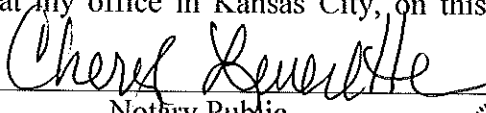
Further the Affiant sayeth not.



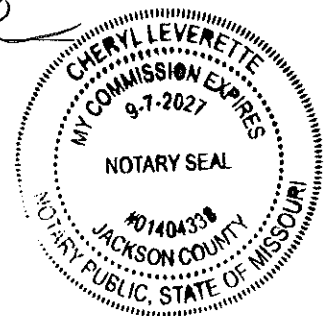
KEITH MAJORS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 12th day of June 2024.



Notary Public



ATTACHMENT

TOTAL RETAIL REVENUE REQUIREMENT

FOR SECURITIZED ENERGY

TRANSITION CHARGE

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

ATTACHMENT
ESTIMATED UPFRONT
FINANCING COSTS
HAS BEEN DEEMED
CONFIDENTIAL
IN ITS ENTIRETY