

**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) **File No. EF-2024-0021**
Transition Costs related to Rush Island Energy Center)

STAFF REQUEST FOR CLARIFICATION OR CORRECTION

COMES NOW Staff of the Missouri Public Service Commission and respectfully submits the following Request for Clarification or Correction and in support thereof states as follows:

1. The Commission issued its *Report and Order* (“Order”) in this case on June 20, 2024, with an effective date of July 20, 2024.
2. The Order contains certain provisions that are unclear or possibly incorrect, and Staff therefore requests the Commission issue an order clarifying or correcting the matters set forth below.

Issues for Clarification or Correction

- A. Page 39, last paragraph, “the company failed to justify the exclusions” should be “the Public Counsel failed to justify the exclusions”
- B. Page 65 paragraph 129 of the Order indicates that the updated estimated interest rate of 5.331 percent referenced in Mark Davis’s testimony did not reference a specific time period or date. However, the updated estimated interest rate of 5.331 percent, referenced by staff witness Mark Davis, was based on treasury rates as of March 21, 2024 as reflected in Footnote 10, Page 9, of his Surrebuttal Testimony, specifically the 5-Year and 10-Year treasury rates were at 4.253% and 4.267% respectively as specified in the testimony, and the Order should be corrected to reflect such.

- C. Page 112 paragraph XX is either missing something or the word “and” should be “are” in last line
- D. Page 120 paragraph 255 reference to “anomalous weather event” should be deleted
- E. Page 128 paragraph 274, Page 134 paragraph 286, and possibly Ordering Paragraph 38 appear to conflict with the decision regarding territorial agreements on pages 104-105
- F. Page 130 paragraph 278 refers to Finding of Fact (“FOF”) 205 as defining “total securitized revenue requirement” but FOF 205 relates to voltage adjustments
- G. Page 132 paragraph 280 refers to FOF 206 as describing “total securitized revenue requirement” but FOF 206 relates to discounts
- H. Page 135 paragraph 287 “The form of Securitized Utility Tariff Rider included in this Financing Order is reasonable and *these tariff provisions will be filed*” conflicts with Ordering Paragraph 9 which orders that “The form of Securitized Utility Tariff Rider attached as Appendix B to this order *shall be updated* to reflect all of the Commission decisions in this Finance Order.” The Commission should clarify that the tariff provisions need to be updated first and not just filed as included in the Order.
- I. Page 147 paragraph WWW – Although the Order adopted a form of tariffs it did not “approve” specific tariffs; therefore, the Commission should clarify what is meant by the phrase “the tariffs approved hereby”.
- J. Page 151 paragraph FFFF refers to the Circuit Court of JACKSON County; this should either refer to St. Louis County or the City of St. Louis
- K. Page 155 Ordering Paragraph 6 -- “authentication” should be “authorization”
- L. Page 157 Ordering Paragraph 8 – Something is missing from the sentence “The Finance Team may request such revisions to the issuance advice letter as may be

necessary to assure the accuracy of the calculations and information included and that the requirements of the Securitization Law and this Financing Order.”

M. Appendix A page 5 says “Evergy Missouri West, Inc. d/b/a Evergy Missouri West” in the signature block rather than “Union Electric Company d/b/a Ameren Missouri.”

N. Appendix A page 11 contains a table which contains a column titled “FAC/PISA 20 Years;” however, this was not listed in the Order as a traditional recovery method. Therefore, this column should be deleted.

O. Given the industry-wide interchangeability of the terms “Series” and “Tranche,” the references to “one series consisting of one or more tranches” throughout the Order (see, for example, pages 125, 160, and 172) could be clarified through a more precise specification, such as “Series 2024 issuance, consisting of one or more tranches.” The following clarification language is suggested: “Each “Series,” such as the “Series 2024 issuance,” may consist of one or more tranches issued concurrently. For the avoidance of doubt, it is assumed that all tranches within a single series are issued on the same date.”

WHEREFORE, Staff respectfully requests the Commission issue an order clarifying or correcting the above issues.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 19th day of July 2024.

/s/ Jeffrey A. Keevil