Exhibit No.:	
Issue(s):	Expense; Decommissioning
Witness:	Daniel E. Deschler
Type of Exhibit:	Direct Testimony
Sponsoring Party:	Union Electric Company
File No.:	EO-2023-0442
Date Testimony Prepared:	October 11, 2024

MISSOURI PUBLIC SERVICE COMMISSION

File No. EO-2023-0442

DIRECT TESTIMONY

OF

DANIEL E. DESCHLER

ON

BEHALF OF

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

St. Louis, Missouri
October 11, 2024

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DIRECT TESTIMONY

OF

DANIEL E. DESCHLER

FILE NO. EO-2023-0442

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Daniel E. Deschler. My business address is 1901 Chouteau Avenue, St. Louis, Missouri, 63103.

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

A. I am employed by Ameren Services, I am the Trust Investments Supervisor in Treasury Operations.

Q. Please describe your professional background and qualifications.

A. I graduated with a Bachelor of Science degree in Mechanical Engineering from the University of Missouri – Columbia in 1978. In 1985, I received a Masters degree in Business Administration from Southern Illinois University at Edwardsville.

I was employed by Union Electric Company in March 1982 as a Mechanical Engineer in the Engineering and Construction Department. While serving in this department, I designed and supported various construction projects in support of the Union Electric power plants.

In 1988 I became a Facilitator in Union Electric's Quality Improvement Program. In 1990 I was invited into the Treasurer's function to support economic analyses for capital budgeting purposes. Beginning in 1993 I was promoted to Assistant Treasurer and assumed duties related to Union Electric's employee benefit trusts. I continued in this role until 1999 when I transitioned to managing various leveraged lease assets which the company acquired with its merger with Central

Illinois Public Service Co. During this time, however, I remained on the Ameren Investment Committee overseeing the employee benefit trusts. In 2009 I began working in Ameren's Credit Risk Department within the Treasury function. I once again assumed day to day responsibilities for employee benefit trusts in the fall of 2018 and have continued in this role since then.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support the Company's request to annually fund the level of its decommissioning trust fund by $6,758,605, with $6,082,745 allocated to plant decommissioning and $675,860 allocated to Independent Spent Fuel Storage Installation " ISFSI" decommissioning. Consistent with the Missouri Public Service Commission's ("Commission) rules, the Company also filed a decommissioning cost study, and the funding amount proposed by the Company is reasonable to defray future decommissioning costs.

My testimony specifically addresses the following:

1) Request for approval of quarterly amounts to be expensed and contributed to the Missouri jurisdictional sub-account of the Callaway Energy Center Tax Qualified Nuclear Decommissioning Trust Fund relative to the updated decommissioning cost estimate;

2) Request for confirmation by the Commission that the decommissioning expenses associated with the quarterly contributions are included in the Company's cost of service and are reflected in its rates for ratemaking purposes, as required by 10 CFR 50.75(e)(1)(ii)(A) in order for the Company to utilize the external sinking fund method of decommissioning funding; and

3) Confirmation by the Commission of the financial and economic parameters used in the establishment and approval of the contribution amount, as required by 10 CFR 50.75(e)(1)(ii) in order to utilize a real rate of return greater than 2%.

Q. Are you sponsoring any schedules?

A. Yes. I am sponsoring the following schedules:

Schedule DED-D1 – Statement of Net Assets; and

ScheduleDED-D2 – Callaway Plant Tax Qualified Nuclear Decommissioning Trust Fund as of June 30, 2023.

Q. How is the Company currently funding nuclear decommissioning in its Missouri electric jurisdiction?

A. The Company's Missouri rates currently include nuclear decommissioning expense of $6,758,605 in its cost of service. This amount is collected by the Company and then placed quarterly in an external tax-qualified trust. This procedure has been used by the Company since the Callaway Energy Center was included in rate base. The annual expense included in the cost of service is determined by levelizing the contribution which must be placed annually in the external qualified trust through the end of the operating license of the Callaway Energy Center in order to provide fully for the total expenditures which are estimated to be needed for decommissioning the plant at that time.

Q. When did the Company file its last triennial decommissioning cost estimate and funding level update, as required by 4 CSR 4240-3.185, with the Commission?

A. The Company filed its latest triennial decommissioning cost estimate and funding level analysis with the Commission on November 5, 2020. The Commission issued its "Order

Approving Stipulation and Agreement" on February 24, 2021, in File No. EO-2021-0050. In that docket and consistent with the Commission's rules, the Company used the current expiration date of the Callaway Energy Center's operating license as the basis for the funding level.

Q. What is the current annual expense and contribution amount for the Missouri jurisdiction for nuclear decommissioning?

A. The current annual decommissioning expense and contribution amount approved for the Commission for the Missouri jurisdiction is $6,758,605. Of this contribution amount, $6,242,226 is allocated to the Plant sub-account and $516,379 is allocated to the ISFSI sub-account. To determine this amount, Ameren Missouri conducted a financial analysis that used a static set of assumptions. In that docket, the amount was determined reasonable.

Q. What is the expiration date of the Callaway Energy Center's operating license?

A. October 18, 2044.

Q. Did the Company use October 18, 2044 as the basis for funding of decommissioning activities in this docket?

A. Yes. As in EO-2021-0050, and consistent with the Commission's rules, the funding levels requested were calculated on a levelized basis and which accrue future decommission costs over the remaining license of the nuclear plant.[1] The Commission rules require the Company to file updated decommissioning cost studies, along with the required funding levels necessary to defray these decommissioning costs, with the Commission every three years.[2]

Specifically, 4 CSR 4240-3.185(4)(A) states, in part:

> . . .3. Funding levels which are computed on a levelized basis and which accrue future decommissioning costs <u>over the remaining licensed life</u> of the nuclear

[1] *See* 4 CSR 20-3.185(4)(A)3.
[2] *See* 4 CSR 20-3.185.

> generating unit. The utility shall include the earnings rate and inflation rate assumed in the cost study as compared to those assumed in any previous study; . . .

> "5. The beginning date for the expenditure of funds for decommissioning assumed in the study shall be <u>no later than</u> the expiration date of the unit's <u>current</u> Nuclear Regulatory Commission (NRC) license; and...

Given the foregoing requirements under the Commission's rules, the Company is required to derive updated decommissioning funding levels for each triennial study based on the expiration date of the current operating license in effect at the time of the study.

Q. Did the Company provide an updated cost study in this docket?

A. Yes, the Company included the cost study as Attachment 3 when it filed its Amended Application on March 4, 2024.

Q. Who conducted the decommissioning cost study?

A. Ameren Missouri contracted with TLG Services, Inc. ("TLG") to perform, under the direction of Ameren Missouri, the site specific cost study to determine the estimated cost for decommissioning the Callaway Energy Center Plant and ISFSI. Since 1982, TLG has provided engineering and field services for contaminated facilities including estimates of decommissioning costs for nuclear generating units. TLG is an industry leader in nuclear power plant decontamination and decommissioning planning, cost estimating, and project field supervision and has prepared and updated decommissioning cost estimates for the vast majority of nuclear generation units in the country. TLG also is the company that prepared the decommissioning cost estimates that were filed with and approved by the Commission in 1993, 1999, 2002, 2005, 2008, 2011, 2015, 2018, and 2020 as well as the ISFSI decommissioning cost estimate in 2015 and 2018.

Q. What was the decommissioning cost estimate at the time of the last triennial update filing in the Missouri jurisdiction?

A. A decommissioning cost estimate of $1,046,835,000, in terms of 2020 dollars, was submitted in the Company's last decommissioning cost estimate and funding level analysis, filed with the Commission on November 5, 2020 (Case No. EO-2021-0050).

Q. What is the present decommissioning cost estimate?

A. The present total decommissioning cost estimate is $1,097,947,000 in terms of 2023 dollars.

Q. How was the analysis conducted to evaluate the current level of funding?

A. Ameren worked with its consultant, Willis Towers Watson ("WTW") and WTW used a stochastic modeling approach using the current level of annual contribution approved in prior filings. This stochastic model is a proprietary model developed by WTW. This stochastic model simulates 5000 scenarios into the future varying key capital market parameters.[3] These key capital market assumptions used in the stochastic model: rate of return on US large cap equities, rate of return on government/credit bonds and a rate of return on cash.[4] Additionally, the stochastic model assumed an asset allocation of 65% equities and 35% fixed income and rebalanced the assets when allocations were plus/minus 5% of these targets. Within 5 years of decommissioning the stochastic model began to derisk the assets by reallocating to a target allocation of 50% equities and 50% fixed income. To the extent the rebalancing triggered any realized gains/losses the stochastic model assumed a federal tax rate of 20% and a 0% state tax rate. For income tax purposes the stochastic model assumed a 2% dividend yield for equities and a simulated yield for fixed income. In the case of decommissioning costs, the stochastic model

[3] *See* Amended Attachment 4 to the Amended Application at pages 2-5.
[4] *Id.*

used TLG's estimate of $1,097,947,000 and assumed a rate of inflation of 4.19%. The stochastic model varied these parameters within the range of the standard deviation as shown in Amended Attachment 4 to the Amended Application.

The outcome of the 5000 scenarios showed that in 67% of the cases the ending value was sufficient to fund the anticipated costs of decommissioning Callaway. This outcome was compared to WTW's database of 31 other utilities who fund their NDT obligations which had a median probability of having sufficient funds available of 73%. Given the many factors that can vary over time the stochastic modeling results give a realistic picture of the risks associated with having sufficient funds for decommissioning.

Q. Please describe the financial and economic input assumptions used in the economic analysis.

A. The financial and economic input assumptions considered several factors including but not limited to the total market value of the two trusts, the estimated returns on the trust funds, the estimated decommissioning costs, the estimated tax rates, and inflation. Basic input parameters are as follows:

Callaway Modeling Assumptions			
Assets - 6/30/2023	Plant*	ISFSI	TOTAL
Market Value of Assets	$ 1,070,850,000	$ 4,390,000	$ 1,075,240,000
Book Value of Assets	$ 566,141,000	$ 3,621,000	$ 569,762,000
After Tax Liquidation Value	$ 969,908,000	$ 4,236,000	$ 974,144,000
Liabilities - *in 2023 dollars*			
Cost of Decommissioning	$ 1,085,651,000	$ 12,296,000	$ 1,097,947,000
* Includes Missouri and FERC			

- Base year of the cost estimate: 2023
- Missouri jurisdictional allocator: 100%

- Federal income tax rate: 20%
- State income tax rate: 0%
- Equity Rate of Return 7.0%
- Standard Deviation 17.9%
- Government/Credit Rate of Return 4.3%
- Standard Deviation 4.0%
- Cash 3.9%
- Standard Deviation 3.1%
- Inflation 2.5%
- Standard Deviation 2.4%
- Projected investment management and trust fees: 15.00 basis points
- Asset allocation: 65% equities and 35% Bonds

Q. What is the basis for the initial "Beginning-of-Year Balance" of the fund?

A. The beginning market value of the assets was $1,075 million corresponding to the June 30, 2023, asset balance. This includes both Federal Energy Regulatory Commission ("FERC") and ISFSI sub accounts. The market value for Government/Credit was $346 million and for US Large Cap Equity $729 million. Correspondingly, the initial book value as of June 30, 2023, was $570 million, broken down as $385 million for Government/Credit Bonds and $185 million for equities.

Q. Given the current volatility in the financial markets, should a more recent date be utilized for establishing the beginning balance of the fund?

A. Not necessarily. It is understood that volatility will always be present in the financial markets and that whatever starting point is selected will be somewhat arbitrary as long as the corresponding cost of decommissioning is in line with the valuation date.

Q. What is the basis for the "Current, Total Decommissioning Cost Estimate" and the "Base Year of the Cost Estimate?"

A. The base year is 2023 which is consistent with the most recent cost estimate provided by TLG as of September 2023.

Q. Please describe the income tax rate that is applied by the stochastic model.

A. The stochastic model applies a 20% federal income tax rate and a 0% state income tax rate for a composite income tax rate of 20%.

Q. Why is the trust's income not taxable for Missouri income tax purposes?

A. The State of Missouri imposes a tax upon the taxable income of estates and trusts. Nuclear decommissioning trust funds are not taxable in Missouri as trusts since, for federal income tax purposes, decommissioning trusts file federal Form 1120-ND. Consequently, decommissioning trusts have no federal taxable income and are not required to file a federal income tax return as a trust. And, subsequently, a Missouri trust return is not applicable.

Q. What investment management and trust fees are assumed?

A. The stochastic model assumes an average annual fee of 15basis points for investment management and trust fees (one basis point = 0.01%). The stochastic modeling assumption is based on the expected average level of trust and investment fees that will be paid over the life of the trust. Some of the fees are fixed in nature (i.e., accounting fees and performance measurement fees), others are based on the fund's valuation (i.e., trust administration and investment management fees), and others are based on the quantity of transactions that occur during a given period. The 15-basis point estimate is considered to be a conservative estimate of typical fees that could be expected over the fund's life.

Q. How were the rates of returns on equities and government/credit bonds selected?

A. WTW provided the assumed rates of return for the asset classes. WTW's standard set of assumptions for equities are mostly informed by a long-term historical average of risk premiums. The basic premise is that over the long-term markets tend to be efficient in how they price assets given expected changes in economic growth and valuations. For fixed income markets bond returns are based on the expectation of yield movements over time. For the long-term normative assumptions WTW expects cash will yield 3.75%. Bond yields add a spread based on probability of default and/or downgrades due to credit and market related risks.

Q. Does the stochastic model assume a change in asset allocation as the decommissioning date approaches?

A. Yes.

Q. Why does the stochastic model assume a change in asset allocation as the decommissioning date approaches?

A. During the majority of the fund's life, no withdrawals will be necessary other than for the payment of taxes and management fees. During this time, fluctuations in market valuation resulting from the higher volatility associated with equity investments can be tolerated in order to capture the higher returns. As the time for decommissioning approaches, however, and the need for withdrawals to pay decommissioning expenses is imminent, stability of principal becomes a more significant consideration. At this point, the higher returns associated with equity investments will be sacrificed to achieve the lower volatility and more stable principal valuation associated with fixed income investments.

Q. What projected rate of decommissioning inflation did WTW consider for the stochastic modeling?

A WTW applied a calculated rate of inflation of 4.7%. This was an outcome of the stochastic model which used a mean rate of inflation of 4.19% from the 2020 Triennial filing approved by the Commission. The stochastic model then varied this rate of inflation based on WTW's market factors which caused the rate of decommissioning to range from 2.2% to 6.2% over the forecasted life of the stochastic modeling.

Q. What action will the Company take if future decommissioning inflation rates are significantly different from the projected value?

A. The Company is required to file updated decommissioning cost estimates and funding analyses with the Commission every three years.[5] Should actual decommissioning inflation rates significantly differ from those assumed in this funding analysis, the Company would propose corresponding adjustments in the annual decommissioning expense and contribution amount necessary to adequately fund the future decommissioning liability.

Q. Are the foregoing return assumptions consistent with the actual returns earned by the fund?

A. The annualized return for equities since the fund inception is 10.2% through the period ending June 30, 2023. The annualized return for fixed income since fund inception is 5.4%.

[5] The Company filed with the NRC under 10 CFR 50.75(f)(1) on March 30, 2023, with no docket number. Under this federal requirement, the Company is required to file every two years on the status of the decommissioning funding.

The overall annualized return for the consolidated portfolio since inception is 8.59%. These returns, although higher than the means calculated in the stochastic modeling, are within the standard deviations for each asset class as well as the overall consolidated total return from the stochastic modeling.

Q. Does the recommendation to continue to fund the trust at the current level take into account the mandate under Section 393.292, RSMO which states "the amounts collected from ratepayers and paid into the trust will be neither greater or lesser than the amounts necessary to carry out the purposes of the trust"?

A. Yes. Ameren Missouri's recommendation to maintain the current annual funding level at $6,758,605 is reasonable and consistent with the mandate that the trust should only collect funds necessary and adequate to decommission Callaway. The stochastic model determined a 67% probability of having sufficient funds available to decommission Callaway. This target probability is not precise, however, the probability offers reasonable assurance – especially when compared to other nuclear generating units funding for decommissioning – that the amount of funding necessary to fund Callaway's cost of decommissioning is in line with this mandate.

Additionally, if you take the after-tax value of the trust as of June 30, 2023, $974 million, and divide it by the TLG Cost to Decommission Callaway of $1,098 million this is only 88.7% of the total cost. Using the after-tax value is the appropriate way to make this calculation since any use of these funds would have to be adjusted for taxes. This acknowledges that as of the date of the filing the trust is not overfunded.

Further, I have been advised by counsel that under Missouri law, this funding adequacy will be updated and reviewed every 3 years to monitor this funding going forward and make any adjustments as necessary consistent with the mandate in Section 393.292.

Q. Does the Company intend to place the decommissioning contributions in a "tax-qualified" trust fund?

A. Yes.

Q. Please describe the external tax-qualified trust into which nuclear decommissioning funds are placed.

A. The Company maintains a single, tax-qualified nuclear decommissioning trust into jurisdictional sub-accounts; Missouri – broken down into two sub-accounts one for the Callaway Energy Center ("Callaway" or "Plant") and one for the Independent Spent Fuel Storage Installation ("ISFSI") sub account. Additionally, a third sub account related to Wholesale (FERC) accounts is also maintained. In these sub-accounts all balances, contributions, earnings and other activities are accounted for separately by jurisdiction. The Bank of New York ("BNY") serves as trustee for the external tax-qualified trust. Insight Investments (f/k/a Standish – BNY Mellon Asset Management) and Nuveen Asset Management (formerly FAF Advisors) serve as investment managers. The Company receives a deduction for the amount contributed to the trust for federal income tax purposes. Income earned and realized capital gains on investments in the trust are currently taxable at a rate of 20% for federal income tax purposes. Trust earnings are not subject to state income tax.

Q. What were the balances of the Missouri and Wholesale jurisdictional sub-accounts as of June 30, 2023?

A. The Missouri jurisdictional sub-account, which includes FERC, for the Plant had a total market value of $1,070,850,000 and the sub account for ISFSI had a total market value of $4,390,000. Book value for the Plant sub account was $566,141,000 and $3,621,000 for the ISFSI sub account. These values are illustrated on the trustee's "Statement of Net Assets Available for Benefits" statement, presented as shown in Schedule 1.

Applying the 20% federal income tax rate to the unrealized capital gains embedded in the foregoing balances results in an "After-tax Liquidation Value" of $969,908,000 for the Plant sub-account and $4,236,000 for the ISFSI sub-account. This calculation is shown on the "Callaway Energy Center Tax-Qualified Nuclear Decommissioning Trust Fund Account Valuation" spreadsheet, presented in Schedule 2.

Q. What are the benefits of contributing decommissioning funds to the tax-qualified trust fund as opposed to a non-tax qualified trust fund?

A. Contributions made to the tax-qualified trust fund may be treated as tax-deductible expenses for the Company in the year for which the contributions are made. Contributions to non-tax qualified funds are not tax deductible until they are expended for decommissioning.

Additionally, the income earned by the tax-qualified fund is taxed at 20% for federal income tax purposes. This is lower than the 37% federal income tax rate that applies to non-tax qualified trust funds. The recommended $6,758,605 annual funding level was developed based on this preferential tax treatment. If the contributions were to be made to a non-tax qualified decommissioning trust fund, they would have to be adjusted upward to account for the tax implications.

Q. What is required for contributions to be placed in the tax-qualified decommissioning trust?

A. The Energy Policy Act of 2005 eliminated the statutory requirement that decommissioning costs be included in cost of service for rate making purposes in order to be contributed to a tax qualified decommissioning trust fund. Consequently, no specific

Commission action is necessary for the contributions to be placed in the tax-qualified decommissioning trust.

The Act <u>does not</u>, however, eliminate the requirement for a schedule of ruling amounts. In order to make contributions to the tax-qualified decommissioning trust, the Company must have requested and received from the IRS a "schedule of ruling amounts." The schedule of ruling amounts sets forth the maximum amount that the Company may contribute annually to the tax-qualified decommissioning trust for a specified period of years.

Q. Will the Company be required to seek a schedule of ruling amounts from the IRS as a result of continuing to fund the trust at the current contribution level?

A. No. However, the Company is required to file for a Schedule of Ruling Amount every 10 years. The current contribution received a Schedule of Ruling Amount from the IRS on August 17, 2016. The company will be required to update its request for another Schedule of Ruling Amounts by August 17, 2026, if the amount does not change.

Q. Is the Company proposing any changes in rates as a result of this decommissioning funding analysis update?

A. No. As the annual decommissioning expense and contribution amount is projected to remain at its current level, no change in rates is necessary.

Q. Please summarize the Commission action being requested, within the scope of this testimony.

A. The Company is requesting the Commission approve the Company's Missouri retail jurisdiction annual decommissioning expense accruals and trust fund payments of $6,758,605, with and $6,082,745 allocated to plant decommissioning and $675,860 allocated to ISFSI. As explained above, this amount is supported by the record. The financial analysis shows that the funding level is neither greater or less than the amounts necessary to carry out the purposes of the trust. The Company further requests the Commission make the specific findings outlined in the Amended Application, which are necessary to fully comply with NRC and IRS requirements and regulations.

Q. Are the foregoing actions in the public interest?

A. Yes. The foregoing actions will help ensure that there are adequate funds available for the decommissioning of the Callaway nuclear plant at the end of its operating license in 2044, as required under the Commission rules and Missouri law. The analysis performed by WTW demonstrate that the funding level is neither greater or less than the amounts necessary to carry out the purposes of the trust.

Q. Does this conclude your testimony?

A. Yes.

BNY MELLON

TRDA56 A56G28172000 MONTHLY FINAL 230351 2023-06-30 CYCLE A 23:03:52 RUN DATE: 11-JU

STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS PAGE:

30 JUNE 2023 NA200

A56 G281720
AMEREN SERVICES
PLANT & ISFSI - MO & FERC ALL

BOOK VALUE		
INVESTMENTS:		
COST	$ 3,620,809.69	
INVESTMENTS AT IDENTIFIED COST	562,794,018.20	
		$ 566,414,827.89
RECEIVABLES		
SECURITIES SOLD	15,426,895.02	
INTEREST	2,475,685.65	
DIVIDENDS	698,997.79	
MISCELLANEOUS	274,320.00	
		18,875,898.46
PAYABLES		
SECURITIES PURCHASED	15,524,676.10-	
		15,524,676.10-
CASH		3,888.41-
TOTAL BOOK VALUE		569,762,161.84
UNREALIZED		
APPRECIATION/DEPRECIATION		
UNREALIZED APPRECIATION-INVEST	505,477,379.98	
		505,477,379.98
TOTAL UNREALIZED		505,477,379.98
TOTAL MARKET VALUE		$ 1,075,239,541.82

CALLAWAY PLANT TAX QUALIFIED NUCLEAR DECOMMISIONING TRUST FUND

June 30, 2023

(DATA BASED ON BANK OF NEW YORK AUDITED MONTHLY TRUST STATEMENT)

ACTIVITY DURING THE MONTH	Acc't # A56F50559002 GSP# 195149 Plant - MO - Fixed Income (Standish Mellon)	Acc't # A56F50559102 GSP# 195150 Plant - MO - Equity (Nuveen)	Acc't # A56F50559402 GSP# 858021 ISFSI - MO - Equity Vanguard S&P 500	Acc't # A56F50559502 GSP# 858024 ISFSI - MO - Fixed Income Vanguard Fixed Income	Acc't # A56F50559202 GSP# 195171 Plant - FERC - Fixed Income (Standish Mellon)	Acc't # A56F50559302 GSP# 195172 Plant - FERC - Equity (Nuveen)	Acc't # A56G28172000 GRAND TOTAL
May 31, 2023 Market Value:	**$ 337,116,675.66**	**$ 664,261,477.94**	**$ 2,691,635.25**	**$ 1,526,118.72**	**$ 8,513,077.16**	**$ 16,492,248.74**	**$ 1,030,601,233.47**
Contributions							$ -
Tes							-
Funds Transfers (Out)							-
Other Receipts							-
Earned Income	925,654.41	877,806.60	10,986.41	3,892.62	24,316.72	21,859.70	1,864,516.46
Net Realized Gain / (Loss)	(1,416,895.38)	429,577.61		(9,521.93)	(36,055.79)	10,708.78	(1,022,186.71)
Unrealized Gain / (Loss) for the Period	(511,301.63)	43,087,881.17	166,708.30		(14,398.53)	1,067,089.29	43,795,978.60
Disbursements:							
Trustee Fees							-
Investment Management Fees							-
DeMarche Audit Fees							-
State & Local Tax Expense							-
Federal Tax Expense							-
Other							-
Change in Status Adjustments							-
June 30, 2023 Market Value:	**$ 336,114,133.06**	**$ 708,656,743.32**	**$ 2,869,329.96**	**$ 1,520,489.41**	**$ 8,486,939.56**	**$ 17,591,906.51**	**$ 1,075,239,541.82**
June 30, 2023 Book Value:	373,977,373.07	175,633,970.35	1,907,931.53	1,712,887.16	9,396,810.76	7,133,188.97	569,762,161.84
Total Unrealized Gain (Loss) From Inception	(37,863,240.01)	533,022,772.97	961,398.43	(192,397.75)	(909,871.20)	10,458,717.54	505,477,379.98
Composite Income Tax Rate:	20.0000%	20.0000%	20.0000%	20.0000%	20.0000%	20.0000%	20.0000%
Tax Liability on Unrealized Gain (Loss):	(7,572,648.00)	106,604,554.59	192,279.69	(38,479.55)	(181,974.24)	2,091,743.51	101,095,476.00
June 30, 2023 After-Tax Liquidation Value:	**$ 343,686,781.06**	**$ 602,052,188.73**	**$ 2,677,050.27**	**$ 1,558,968.96**	**$ 8,668,913.80**	**$ 15,500,163.00**	**$ 974,144,065.82**

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Amended Application of Union Electric Company d/b/a Ameren Missouri for Acceptance of Its Triennial Filing of Cost Estimates for Callaway Energy Center Decommissioning, Including the Independent Spent Fuel Storage Installation, and Approval of the Funding Level of the Nuclear Decommissioning Trust Fund.	)))))))	File No. EO-2023-0448

AFFIDAVIT OF DANIEL DESCHLER

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Daniel Deschler, being first duly sworn on his oath, states:

My name is Daniel Deschler, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Daniel Deschler
Daniel Deschler

Sworn to me this 11th day of October 2024.