

Missouri Public Service Commission
Case No. ER-2024-0319
Direct Testimony of Tyler Comings

Exhibit No.: Revenue Requirement
Issues: Tyler Comings
Witness:
Type of Exhibit:
Sponsoring Party: Sierra Club
Case No.: ER-2024-0319
Date Testimony": December 3, 2024
Prepared:

Exhibit TC-2

Public Company Responses to Data Requests

Ameren Response to SC 1-4, and Attachment SIERRA_1-SC_001_4-Att-SC 001.4 Coal CapEx.xlsx.

Ameren Response to SC 1-9

Ameren Response to SC 2-2, and Attachment SIERRA_2-SC_002_2-Att-SC 002.2 Capital OM Project Over 1M- CONF.xlsx*

* Sierra Club confirmed with Ameren that Ameren's response to SC 1-4 and SC 2-2 are in fact not confidential. *

Ameren Missouri
Case Name: ER-2024-0319
Docket No(s): 2024 Electric Rate Review

Response to Discovery Request: SIERRA 1-SC 001.4
Date of Response: 9/20/2024
Witness: N/A

Extension to September 18 per J. Lowery's email dated 08.29.24 KRM

Question: 1.4 For each of the Company's coal-fired units, please provide the following:

- a. The most recent forecast of the units' or common plant's annual i. non-environmental capital costs
 - ii. environmental capital costs, with corresponding regulation
 - iii. major maintenance costs
 - iv. base O&M costs

- b. Please identify each capital and major maintenance project with costs greater than \$1 million that was performed, is planned, or is under consideration for any of the years 2024 through 2030 and that is being requested for rate recovery in this case. Please provide this information in machine-readable Excel format with any formulas intact, and include the following information:
 - i. the unit and/or plant common area where such project was or would be performed
 - ii. the Company's project ID and project description
 - iii. the actual or projected cost for each of the years 2024 through 2030 (where applicable)
 - iv. any categorization of the project used by the Company (e.g., "reliability") if such categories exist.

- c. For each capital and major maintenance project identified in subpart (b) above:
 - i. Please describe the reason for the expenditure, including supporting analyses and documentation for the expense (including but not limited to a project charter, project scope document, economic analysis, and/or other written evaluation of the costs and benefits of such project).
 - ii. For any economic analysis performed by or for the Company, please provide a copy of the economic analysis and all workpapers and modeling files created, used, or relied on as inputs to that economic analysis-with all analyses and workpapers in machine-readable Excel format with any formulas intact.
 - iii. Identify whether the expenditures would be necessary if the plant were to retire sooner than currently planned, and in what retirement year they would be avoidable.
 - iv. If the expenditure would be necessary (i.e., unavoidable), explain why and provide supporting analyses and documentation for this determination.

Response:

Prepared By: Greg Vasel

Title: Director, Generation Engineering and Construction

Date: September 18, 2024

CONFIDENTIAL
20 CSR 4240-2.135(2)(A)4, 8
(ATTACHMENTS ONLY)

a.i – a.ii. Refer to attachment 'SC 001.4 Coal CapEX for breakdown of forecasted capital costs by plant.

a.iii – a.iv. Refer to attachment 'SC 001.4 Coal O&M' for breakdown of forecasted O&M costs by plant.

b. Refer to attachment 'SC 001.4 Cap O&M Projects over 1M' for applicable projects completed or expected to be completed during 2023 and 2024.

c.i – c.ii. Refer to project-specific attachments.

c.iii. – Multiple retirement date scenarios are evaluated as part of the IRP process. Project-by-project analyses have not been performed and would omit consideration for project interdependencies.

Scenario Name

AF213: Jul 2024 Overlay 8-15-24

Sum of Period Amount

Column Labels

| Row Labels | 2025 | 2026 | 2027 | 2028 | 2029 |
|---|------------|-------------|-------------|-------------|------------|
| 53 - Sioux Energy Ctr | 16,595,047 | 10,364,427 | 12,907,201 | 5,592,655 | 6,811,705 |
| 1. CCR-ELG | (3,006) | | | | |
| 045 - Waste | (3,006) | | | | |
| J080G - SX Gypsum Landfill Cell 1 Closure | (3,006) | | | | |
| 4. SWO | 5,649,477 | 4,595,713 | 5,419,082 | 3,297,033 | 4,169,808 |
| 070 - Maintain/Improve Unit Availability | 5,505,172 | 4,445,308 | 5,313,911 | 3,224,085 | 4,067,355 |
| 0A043 - SX SWO Misc Construction Equip | 4,087,887 | 3,046,243 | 3,951,565 | 2,066,574 | 3,073,562 |
| 0A130 - SX SWO Capital Spare Parts | 128,844 | 127,152 | 123,847 | 124,019 | 122,948 |
| J0K93 - SX High Pressure Valve Repl SWO | 1,288,441 | 1,271,913 | 1,238,499 | 1,033,492 | 870,845 |
| 100 - Corporate/Segment Support | 144,305 | 150,406 | 105,171 | 72,948 | 102,453 |
| 0A714 - SX SWO Office Tools Equip | 144,305 | 150,406 | 105,171 | 72,948 | 102,453 |
| 7. Other | 10,948,575 | 5,768,714 | 7,488,118 | 2,295,622 | 2,641,896 |
| 005 - Maintain/Improve Reliability | 980,942 | 1,066,017 | 1,925,654 | 1,141,497 | 1,178,551 |
| J0M05 - Power Ops Labor Balancing | 15,282 | 409,006 | 1,285,507 | 1,141,497 | 1,178,551 |
| J12VN - SX RSCC 1 Chain & Flight Rpl | | 657,012 | | | |
| J12VQ - SX RSCC 2 Chain & Flight Rpl-J12VQ | | | 640,147 | | |
| UEC11260 - SX U1 Econ Ash Hopper Support Upgrades | 380,112 | | | | |
| UEC11795 - SX Replace Unit 1 Air Htr Exp Jt | 195,727 | | | | |
| UEC11796 - SX Replace Water Fill Line | 8,256 | | | | |
| UEC12023 - SX U1 Precipitator Tie Duct Expansion Joints Replacement | 381,565 | | | | |
| 043 - Air SOx | 193,537 | 196,778 | 197,367 | 203,566 | 103,084 |
| J0GG6 - EM&T - SX Limestone Grinding Plant | 193,537 | 196,778 | 197,367 | 203,566 | 103,084 |
| 052 - Aquatic Life | 2,283,810 | 2,729,832 | 2,267,337 | 775,122 | 771,588 |
| 15531 - SX-316B COMPLIANCE | 2,283,810 | 2,729,832 | 2,267,337 | 775,122 | 771,588 |
| 070 - Maintain/Improve Unit Availability | 6,274,164 | 1,501,598 | 3,097,761 | 71,517 | 588,674 |
| J0JNQ - SX - U2 A Circ Water Pump | 62,041 | 65,354 | 68,867 | 71,517 | 74,278 |
| J1018 - SX- 1A ID Fan Hub Replacement | 1,059,218 | | | | |
| J1019 - SX- 2B ID Fan Hub Replacement | | | 996,105 | | |
| J101B - SX- 1B ID Fan Hub Replacement | | 1,049,308 | | | |
| J101C - Sx - U1 BLR Lwr Wall Refractory Rpl | 1,715,773 | | | | |
| J101D - SX U1 Furnace Floor N & S Slag Tap Rpl | 1,804,296 | | | | |
| J101R - SX 1 Sootblowing Controls Rpl | 333,809 | 3,676 | | | |
| UEC11055 - SX Replace 2D CVP with Core Assembly | | | 112,350 | | |
| UEC11521 - SX U2 BLR Wall Refractory Repl | | | 1,920,439 | | |
| UEC11523 - SX 1A GR Fan Expansion Joint Repl | 321,614 | | | | |
| UEC11524 - SX 1A Instrument Air Comp Repl | | 383,261 | | | |
| UEC11525 - SX Install Remote DCS I/O Repl | 388,154 | | | | |
| UEC11526 - SX Replace 1D CVP with Core Assembly | 121,994 | | | | |
| UEC11530 - SX 1 EHC System Flush/Repair | | | | | 514,396 |
| UEC11654 - SX Capital Spare ID Fan Blades | 467,264 | | | | |
| 075 - Maintain/Improve Unit Efficiency | 757,041 | | | | |
| J1020 - SX U1 Perf Monitor Replacement | 274,524 | | | | |
| J1021 - SX U2 Perf Monitor Replacement | 274,524 | | | | |
| UEC10717 - SX 1B GR Fan Expansion Joint Repl | 207,993 | | | | |
| 080 - Asset Protection | 701 | 274,488 | | | |
| J10X7 - Sioux Physical Security UPGR | 701 | 274,488 | | | |
| 085 - Personnel Safety | 458,382 | | | | |
| UEC11853 - SX Passenger Elevator Replacement | 458,382 | | | | |
| 117 - General Facilities | | | | 103,921 | |
| J123L - SX Barge Unload River Struct Upgr | | | | 103,921 | |
| 58 - Labadie Energy Ctr | 94,861,918 | 235,935,228 | 244,212,366 | 155,076,870 | 17,888,220 |
| 2. Major Outages | 27,274,587 | 100,016,080 | 105,824,399 | 20,652,205 | 735,576 |
| 005 - Maintain/Improve Reliability | 459,432 | 1,410,451 | 4,649,832 | | |
| J101J - LBD U1 HEP HRH Elbow REPL | 27,937 | 29,428 | 4,649,832 | | |
| J12KV - LBD U4 Coal Burner REPL | 26,359 | 719,701 | | | |
| J137H - LBD U4 Fly Ash Controls UPGR | 27,234 | 427,645 | | | |
| UEC10681 - LBD U4 DCS Power Supplies Total | 377,902 | 233,677 | | | |
| 070 - Maintain/Improve Unit Availability | 25,351,887 | 91,290,992 | 84,755,225 | 9,635,145 | |
| 13084 - LBD U1 MCC REPL PHASE 3 | 1,516 | 2,381 | 2,509 | | |
| 13747 - LBD U4 FINAL SUPERHEATER REPL | 847,086 | 3,346,342 | | | |
| 14343 - LBD U4 4160V BREAKER REPL | 2,155,281 | 1,808,940 | | | |
| 14349 - LBD U1 EXCITATION XFMR REPL | | 726,163 | 864,276 | | |
| 20355 - LBD U2 MCC REPL PHASE 3 | | | 5,129,112 | | |
| 20356 - LBD U2 KLINE BREAKER PH2 REPL | | 3,271,013 | 1,124,938 | | |
| 25048 - LBD U1 UPPER FURN HYDROJET INSTALL | 1,342 | 411,326 | 2,441,080 | | |
| J00TH - LBD U4 Repl Reheater (Headers & Asm | 1,926,965 | 12,883,836 | | | |
| J00V1 - LBDS - U3 LP Extraction Expansion J | 16,117 | | | | |
| J02TN - LBD U2 MCC REPLMNT PHASE 2 | | | 9,420,676 | | |
| J03J1 - LBD U1 MCC REPL PHASE 4 | | 713,942 | 1,839,623 | | |
| J05Q9 - J05Q9 - LBD U3 Excitation UPGR | 250,499 | | | | |
| J0CN7 - LBD U2 Generator Field Rewind | | 111,587 | 4,489,786 | | |
| J0CN8 - LBD U3 Generator Field Rewind | 168,432 | | | | |
| J0FJK - LBD U4 Coal Mill Transport Pipe Rep | 13,982 | 2,224,168 | | | |
| J0FL6 - LBD-REPL U4 A/B/C Casing/Suc Valve | 118,968 | 3,270,044 | | | |
| J0GDW - LBD U4 MCC Replacement Phase 3 | 471,450 | 2,027,291 | | | |
| J0GFO - LBD U4 Siemens Switchgear Replaceme | 515,079 | 1,111,849 | | | |
| J0GFD - LBD U4 Main Turbine Controls | 4,103,295 | 5,128,260 | | | |
| J0GFF - LBD U4 HPBFP Turbine Controls | 2,397,201 | 5,136,883 | | | |
| J0GNN - LBD - U4 MOV-23 REPL | 344,660 | 643,861 | | | |

| | | | | | |
|--|------------|-------------|-------------|-------------|------------|
| JOGNP - LBD - U4 MOV-24 REPL | 178,135 | 638,661 | | | |
| JOJHZ - LBD U4 Soot Blowing System Controls | 92,097 | 884,047 | | | |
| JOJN2 - LBD U4 GSU Repl/Upgrade | 427,770 | 1,711,102 | | | |
| JOJR1 - LBD - 4B HPBFP Casing Replacement | 72 | 789,492 | | | |
| JOKCS - LBD U4 LP Turbine Extr Exp Int Rep | 97,159 | 1,079,894 | | | |
| JOKXF - LBD U2 GSU Repl | | | 10,088,925 | | |
| JOLTZ - LBD Starting Transformer Spare | 115,534 | 2,638,532 | | | |
| JOM5N - LBD U4 APH Basket REPL | 59,699 | 2,145,221 | | | |
| JOMFN - LBD - U1 APH Basket REPL | | 635,730 | 2,266,272 | | |
| JOMFQ - LBD U1 4160V BREAKER RPL | | 1,910,956 | 4,550,684 | | |
| JOMFW - LBD U1 BMS DCS REPL | | | 199,414 | 764,171 | |
| JOMGO - LBD - 1B HPBFP Casing Rpl | | 607,214 | 1,698,417 | | |
| JOMG2 - LBD - U1 Coal Burn Assembly REPL | | 603,148 | 1,704,663 | | |
| JOMGD - LBD - U3 Siemens Switchgears REPL | 69,843 | 395,348 | 296,146 | 1,263,030 | |
| JOMGG - LBD U4 DCS Ctrl & Comm Cards REPL Total | 823,271 | 395,306 | | | |
| JOMGL - LBD - U3 HPBFP Turbine Controls EC | 124,313 | | | | |
| JOMGT - LBD - 1C PRC Rewire Rows C & D | | 446,390 | 976,502 | | |
| JOMGX - LBD - U1 BLR Circ Pmp Disch Vlv Rpl | | | 248,693 | | |
| JOMH9 - LBD - U3 Main Turbine Controls | 223,889 | 4,615,912 | 5,877,528 | | |
| JOMHC - LBD - U1 480V Breaker REPL | | 261,302 | 185,504 | 4,366,033 | |
| JOMHD - LBD - U1 Siemens Switchgears REPL | | | 2,156,174 | | |
| JON25 - LBD U2 Siemens Switchgear REPL | | 109,612 | 2,158,622 | | |
| JOP60 - LBD - U4 APH Drive System REPL | | 1,900,720 | | | |
| JOP8T - LBD - U4 Steam-cooled Spacer Repl | 610 | 878,169 | | | |
| JOP9D - LBD - U4 SH Platen WCS REPL | 1,965 | 439,279 | | | |
| JOP9H - LBD - U4 Screenwall Pier REPL | 327,016 | 304,761 | | | |
| JOP9Q - LBD U3 SH LINK REPL | 21,511 | | | | |
| JQJN1 - LBD - U4 Lower Slope Corner Panel R | 937,798 | 3,826,130 | | | |
| JOS6Q - LBD - U1 HPBFP Turbine Blade REPL | | | 2,113,120 | 2,246,159 | |
| JOS6T - LBD - U2 Reheater REPL | | 3,603,801 | 16,243,377 | | |
| JOS6V - LBD - U2 4160V BREAKER REPL | | | 5,470,563 | | |
| JOX62 - LBD UPGR U4 Exciter DFE | 715,122 | 960,727 | | | |
| JOZ74 - LBD - 4B HPBFP Element REPL | 73,883 | 123,894 | | | |
| JOZ9H - LBD - U1 Safety Valves | | | 235,589 | | |
| JOZKV - LBD - U4 BDS Expansion Joint REPL | 193,940 | 683,151 | | | |
| J10H5 - LBD U3 DCS BMS Cabinets REPL | 87,028 | | | | |
| J10H6 - LBD U3 DCS Ctrl & Comm Card REPL | 141,819 | | | | |
| J10Z7 - LBD U3 DCS Motor Control Cabinets | 75,956 | | | | |
| J10Z8 - LBD U3 DCS Power Supplies | 31,359 | | | | |
| J11K2 - LBD U4 DCS Motor Control Cabinets Total | 264,545 | 410,567 | | | |
| J11K3 - LBD U4 DCS Boiler Controls Cabinets Total | 597,081 | 398,901 | | | |
| J11K4 - LBD U3 DCS Boiler Controls Cabinets | 93,047 | | | | |
| J11K5 - LBD U4 4A HPBFPT REPL | 2,740,675 | 891,967 | | | |
| J11K6 - LBD U4 Main Turb and Vlv Component | 2,931,592 | 11,752,941 | | | |
| J12WJ - LBD U1 Boiler Cont DCS REPL | | | 609,267 | 995,753 | |
| J12WK - LBD U1 Motor Cont DCS REPL | | 191,775 | 787,921 | | |
| J12WL - LBD U1 DCS Power Sup REPL | | 191,775 | 787,921 | | |
| J12WM - LBD U1 DCS Ctrl & Comm Card REPL | | 191,775 | 787,921 | | |
| J1371 - LBD-U4 Level Ignitor Assembly REPL | 49,461 | 1,048,928 | | | |
| J1375 - LBD 4E Coal Mill Adj Riffle | 261,911 | 402,990 | | | |
| J1376 - LBD 4F Coal Mill Adj Riffle | 261,911 | 402,990 | | | |
| 075 - Maintain/Improve Unit Efficiency | | 3,194,667 | 13,634,705 | | |
| JOR40 - LBD 2 HP/IP | | 3,194,667 | 13,634,705 | | |
| 085 - Personnel Safety | 1,463,268 | 4,119,969 | 2,784,637 | 11,017,059 | 735,576 |
| JOR3T - LBD U3 Main Turb and Vlv Component | 419,216 | | | | |
| JOR3W - LBD 1 Main Turb and Vlv Component | | | 2,784,637 | 11,017,059 | 735,576 |
| JORTK - U4 HEP Elbow Replacement | 570,423 | 4,119,969 | | | |
| JOTHT - U3 HEP Elbow Replacement | 473,630 | | | | |
| 4. SWO | 9,976,142 | 10,642,790 | 10,363,454 | 10,377,640 | 10,330,323 |
| 070 - Maintain/Improve Unit Availability | 9,195,605 | 9,874,339 | 9,615,190 | 9,628,351 | 9,584,451 |
| 0A048 - LBD SWO Misc Construction Equip | 6,967,685 | 7,674,999 | 7,473,626 | 7,483,856 | 7,449,733 |
| 0A132 - LBD - Capital Spare Parts WO | 563,693 | 556,462 | 541,844 | 542,585 | 540,111 |
| JOR4D - LBD SWO Piping & Valves | 1,073,696 | 1,059,923 | 1,032,079 | 1,033,492 | 1,028,779 |
| JOR4F - LBD SWO Motor Rewind/Repl | 161,055 | 158,989 | 154,812 | 155,024 | 154,318 |
| JOR4G - LBD SWO Platform Replace | 268,421 | 264,978 | 258,017 | 258,370 | 257,192 |
| JOR4H - LBD SWO Vehicle/Mobile Equip | 161,055 | 158,989 | 154,812 | 155,024 | 154,318 |
| 100 - Corporate/Segment Support | 780,537 | 768,451 | 748,264 | 749,288 | 745,872 |
| 0A716 - LBD - Purchased Assets WO | 780,537 | 768,451 | 748,264 | 749,288 | 745,872 |
| 7. Other | 57,611,188 | 125,276,358 | 128,024,513 | 124,047,025 | 6,822,322 |
| 005 - Maintain/Improve Reliability | 13,206,939 | 6,387,659 | 10,954,467 | 7,517,355 | 6,050,340 |
| JOM05 - Power Ops Labor Balancing | (178,835) | (740,565) | (745,140) | 2,965,763 | 3,057,138 |
| J101K - LBD U2 HEP HRH Elbow REPL | 30,082 | 31,688 | 4,999,344 | | |
| UEC10810 - LBD Turbine Roof REPL | 530,046 | 572,671 | | | |
| UEC11000 - LBD Rail Receiving MCC Repl UB46 | 1,040,936 | | | | |
| UEC11001 - LBD Rail Receiving MCC Repl OB46 | 901,936 | | | | |
| UEC11285 - LBD 2 LP L-0 Blade & TRB Vlv REPL | 6,899,819 | 52,777 | | | |
| UEC11558 - LBD U3 WFC Idlers REPL | 1,201 | | | | |
| UEC11563 - LBD 2B HPBFP Casing REPL | 758,991 | | | | |
| UEC11564 - LBD U2 HPBFP Rotating Element REPL | 271,068 | | | | |
| UEC11670 - LBD Receiving Pit Vault Roof REPL | 10,731 | 1,365,065 | | | |
| UEC11673 - LBD S Stacker Elevator Modernization | 8,783 | 912,624 | | | |
| UEC11674 - LBD Service Bldg Elevator Modernization | 1,739 | 51,346 | 3,904 | | |
| UEC11675 - LBD N Stacker Elevator Modernization | 15,409 | 939,340 | | | |

| | | | | | |
|--|------------|-------------|-------------|-------------|-----------|
| UEC11804 - U1 DFC Wear Plates REPL | | | 156,248 | | |
| UEC11805 - U4 WFC Idler Chain & Flight REPL | | | | | 168,438 |
| UEC11806 - U3 APH CE Basket REPL | | | 521,630 | 521,893 | |
| UEC11807 - U1 FAR Lateral Pipe REPL | | | | 210,171 | |
| UEC11808 - U2 FAR Lateral Pipe REPL | | | 208,319 | | |
| UEC11809 - U4 Expansion Joint REPL | | | | | |
| UEC11810 - U1 Expansion Joint REPL | | 418,285 | | | 419,490 |
| UEC11812 - U2 DFC Wear Plate Chain Flight REPL | 268,165 | | | | |
| UEC11814 - U4 DFC Wear Plate Chain Flight REPL | 160,179 | 108,859 | | | |
| UEC11816 - U2 WFC Chain & Teeth REPL | 173,892 | | | | |
| UEC11818 - U1 WFC Idler Chain & Flight REPL | 173,892 | | | | |
| UEC11819 - U2 SFC Chains & Flights REPL | 625,018 | | | | |
| UEC11821 - U2 APH Basket REPL | | 1,072,027 | 1,071,753 | | |
| UEC11825 - U2 Expansion Joint REPL | 429,364 | | | | |
| UEC11826 - U1 Boiler & Turb Roof Vent Fan REPL | 1,073,410 | | | | |
| UEC11828 - U3 HP & LP Cond Dogbone Seal XJ REPL | | | | | 513,142 |
| UEC11834 - U1 HP & LP Cond Dogbone Seal XJ REPL | | | | | 525,127 |
| UEC11835 - U2 HP & LP Cond Dogbone Seal XJ REPL | | | 521,014 | | |
| UEC11836 - U1 1A BCWP S Discharge Valve REPL | | | 104,165 | | |
| UEC11837 - U2 A HPBFP Element REPL | | | | | 419,490 |
| UEC11838 - U1 IP Pump REPL | | | 523,911 | | 146,188 |
| UEC11839 - Coal Mill OH - Spring | | | | | 256,571 |
| UEC11840 - Coal Mill OH - Fall | | | | | 261,920 |
| UEC11841 - Coal Mill OH - Spring 29 | | | | | |
| UEC11842 - Coal Mill OH - Fall 29 | | | | | 258,150 |
| UEC11843 - U4 Burner REPL | | | | | 260,030 |
| UEC11844 - U2 Burner REPL | | | 2,083,600 | | 2,079,479 |
| UEC11858 - U2 Boiler & Turb Roof Vent Fan REPL | | 1,079,946 | | | |
| UEC11859 - U3 Boiler & Turb Roof Vent Fan REPL | | | 1,046,682 | | |
| UEC11860 - U4 Boiler & Turb Roof Vent Fan REPL | | | | | 1,047,682 |
| UEC11861 - U3 B CWP Impeller REPL | | | | | |
| UEC11862 - U4 B CWP Impeller REPL | | | | | 229,918 |
| UEC11863 - U3 A CWP Impeller REPL | | | 229,517 | | |
| UEC11864 - U4 A CWP Impeller REPL | | | 229,517 | | |
| UEC11873 - U4 HP & LP Condenser Dogbone Seal XJ REPL | | 523,597 | | | |
| UEC11987 - LB3 Steam Seal Regulator REPL | 11,110 | | | | |
| 006 - Regulatory Compliance | 26,928,408 | 106,260,734 | 100,652,973 | 113,208,080 | |
| JOB5 - LBD Ground Water Improvement | 1,239,881 | 15,396,080 | 7,969,992 | | |
| UEC11643 - Labadie MATS Compliance | 25,688,527 | 90,864,654 | 92,682,980 | 113,208,080 | |
| 042 - Air NOx | 80,815 | | | | |
| JOZWL - LBD NOx Control | 80,815 | | | | |
| 043 - Air SOx | 172,249 | 197,628 | 208,242 | 216,244 | |
| 15439 - LBD FGD Retrofit | 172,249 | 197,628 | 208,242 | 216,244 | |
| 052 - Aquatic Life | 2,253,002 | 1,071,157 | 410,434 | | |
| JOXSH - LBD U1 316 COMPLIANCE | 577,248 | 303,230 | 114,800 | | |
| JOXSJ - LBD U2 316 COMPLIANCE | 680,770 | 303,230 | 122,542 | | |
| JOXSK - LBD U3 316 COMPLIANCE | 503,241 | 239,634 | 86,546 | | |
| JOXSL - LBD U4 316 COMPLIANCE | 491,744 | 225,063 | 86,546 | | |
| 056 - Environmental Compliance | 13,636 | 4,163 | 4,387 | 4,556 | 1,950 |
| UEC12000 - LBD Natural Gas Conversion | 13,636 | 4,163 | 4,387 | 4,556 | 1,950 |
| 070 - Maintain/Improve Unit Availability | 14,375,256 | 11,084,435 | 14,915,818 | 3,100,791 | 770,032 |
| 13082 - LBD U3 MCC REPL PHASE 2 | 531,694 | | | | |
| 16795 - LBD U3 ISOPH BUS DUCT COOLER UPGR | 2,393 | 98,350 | 1,066,440 | 93,474 | |
| J06QR - LBD U3 4160V BREAKER RPL | 6,169 | 1,277,236 | 3,984,889 | 233,001 | |
| J0G6R - LBD - U3 A CWP REPLACEMENT | | | 200,762 | | |
| J0GKB - LBD Conveyor Upgrade for Dusting & | 5,736 | 5,133,549 | | | |
| J0JHW - LBD U4 Starting Transformer | 493 | 565 | | | |
| J0MH4 - LBD - Boiler Feed Water IP Pump Cap | 767,329 | | | | |
| J0P93 - LBD North Reclaim Coal Pile Bin Wal | 5,469 | 3,108 | | | |
| J0P94 - LBD South Reclaim Coal Pile Bin Wal | 5,207 | 2,960 | | | |
| J0PB2 - LBD - Install U4 691 elevation stea | 1,195 | | | | |
| J0S6M - LBD U1 COAL MILL REPL | | 246,738 | | | |
| J0S71 - LBD U2 COAL MILL REPL-J0S71 | 198,082 | | | | |
| J0S76 - LBD U3 COAL MILL REPL-J0S76 | 108,946 | | | | |
| J0TX8 - LBD - Aux Steam System Upgrade | 165 | 72 | | | |
| J0VV3 - LBD U2 HPBFP REPL | 701,818 | | | | |
| J0XG3 - LBD U2 SFC/WFC Overflow | 1,039 | 131,246 | 926,786 | | |
| J0XG4 - LBD U3 SFC/WFC Overflow | 14,294 | | | | |
| J0XG5 - LBD U4 SFC/WFC Overflow | 243,215 | 761,912 | | | |
| J0Z8K - LBD U2 BMS DCS REPL | | 793,456 | | 250,055 | |
| J0Z8L - LBD - U1 G5U Protection Relay Repl | | | | 1,561,041 | |
| J0Z9F - LBD - U1 SFC/DFC Chain REPL | | | | 260,169 | |
| J0Z9G - LBD - 1A CWP REPL | | | | 208,139 | |
| J0Z9J - LBD - U1 BDS Expansion Joint Rpl | | | | 366,472 | |
| J0Z9K - LBD - U2 Mill Overhauls | | | | 234,716 | |
| J0Z9L - LBD - 2A CWP REPL-J0Z9L | | | | 213,386 | |
| J0Z9N - LBD - 3B CWP REPL | | | | 213,386 | |
| J0Z9R - LBD - U3 Mill Overhauls-J0Z9R | | 120,456 | | | |
| J0Z9S - LBD - U3 Mill Overhauls-J0Z9S | | | | 117,364 | |
| J0Z9T - LBD - U4 Mill Overhauls-J0Z9T | | | | 117,364 | |
| J11K1 - LBD U3 APH Basket REPL-J11K1 | | | 1,573,410 | 2,054,433 | |
| J11ND - LBD U4 Burner REPL | 1,876,173 | | | | |
| J12WN - LBD - U2 Boiler Cont DCS REPL | | 990,738 | 756,207 | | |

| | | | | | |
|---|-------------|-------------|-------------|-------------|------------|
| J12WP - LBD - U2 Motor Cont DCS REPL | | 192,164 | 794,626 | | |
| J12WQ - LBD - U2 DCS Power Sup REPL | | 192,164 | 794,626 | | |
| J12WR - LBD - U2 DCS Ctrl & Comm Card REPL | | 192,164 | 794,626 | | |
| UEC10833 - LBD S Rail Rec Feeder REPL | 105,363 | | | | |
| UEC11462 - LBD N2-N3 Conveyors UPGR | 5,887,890 | 89,096 | | | |
| UEC11463 - LBD S2-S3 Conveyors UPGR | 3,310,362 | | | | |
| UEC11723 - EM&T - Budget Placeholder Capital Track REPL | 602,223 | 657,699 | 682,113 | 719,883 | 770,032 |
| 075 - Maintain/Improve Unit Efficiency | 51 | 53 | 878,193 | | |
| J0XS3 - LBD U1 Steam Drum Separators REPL | 51 | 53 | 878,193 | | |
| 080 - Asset Protection | 10,378 | 270,528 | | | |
| J0XL4 - LBD 2022 Labadie Physical Security | 708 | 270,528 | | | |
| J129G - LBD Identity Access Mgmt Add | 9,670 | | | | |
| 117 - General Facilities | 570,453 | | | | |
| J137G - LBD U1&2 Pass Elev Mec Room HVAC | 67,820 | | | | |
| J13DS - LBD - Purchase Genie Lift REPL | 502,633 | | | | |
| 63 - Rush Island Energy Ctr | 590,325 | 4,547,086 | 19,461,004 | 16,990,000 | |
| 2. Major Outages | 23,276 | 3,063 | | | |
| 070 - Maintain/Improve Unit Availability | 20,368 | | | | |
| 14410 - RUSH MCC REPL OB13 & OB14 | 20,368 | | | | |
| 085 - Personnel Safety | 2,908 | 3,063 | | | |
| J0RST - RI U1 HEP HRH Elbow Repl | 2,908 | 3,063 | | | |
| 7.Other | 567,049 | 4,544,022 | 19,461,004 | 16,990,000 | |
| 004 - Regulatory Program Adherence | 25,000 | | 2,220,000 | | |
| UEC11171 - RI Demo Asbestos Abatement | 25,000 | | 2,220,000 | | |
| 005 - Maintain/Improve Reliability | (104,004) | (47,004) | | | |
| J0M05 - Power Ops Labor Balancing | (104,004) | (47,004) | | | |
| 070 - Maintain/Improve Unit Availability | 149 | 4,380,074 | | | |
| UEC10992 - OSG Wilmore Int Ext Renovations | 149 | | | | |
| UEC11334 - Rush Island Ash Pond Ballasting | | 4,380,074 | | | |
| 080 - Asset Protection | 645,904 | 210,953 | 17,241,004 | 16,990,000 | |
| J112L - RI Decommissioning Study | 645,904 | 210,953 | 17,241,004 | 16,990,000 | |
| Grand Total | 112,047,289 | 250,846,741 | 276,580,570 | 177,659,525 | 24,699,925 |

Ameren Missouri
Case Name: ER-2024-0319
Docket No(s): 2024 Electric Rate Review

Response to Discovery Request: SIERRA 1-SC 001.9

Date of Response: 9/20/2024

Witness: N/A

Extension to September 18 per J. Lowery's email dated 08.29.24 KRM

Question: 1.9 Has Ameren evaluated whether any of its coal-fired electric generating units will require additional investments to comply with final, proposed, or possible future environmental regulations including, but not limited to: existing consent decrees, new source review provisions, coal combustion residuals, effluent limitation guidelines, national ambient air quality standards, cooling water intake standards, the cross-state air pollution rule, the mercury and air toxics standards, regional haze, and carbon dioxide emission limits?

- a. If not, explain why not.
- b. If so, please provide a summary, organized by electric generating unit, briefly describing the additional investments, including the purpose, and capital and annual O&M costs of such investments.
 - i. Please also include all supporting analyses, calculations, data, documents, modeling input and output files, and workpapers associated with each investment.
- c. If so, please specify those costs that would be incurred even if the unit were to retire before its planned date (i.e., unavoidable costs).
- d. If so, please specify those costs that could be avoidable if the unit were to retire prior to their currently planned date, including the latest year in which each cost could be avoided.

Response:

Prepared By: Matt Michels
Title: Director, Corporate Analysis
Date: August 29, 2024

- a. No; Ameren Missouri is aware of and has been reviewing the many new environmental rules recently promulgated by the federal Environmental Protection Agency (EPA). Because these rules are extremely lengthy, complex, and numerous, it is taking quite some time to review the rules and relate the requirements or potential requirements to Ameren Missouri's operations. It is also important to note that most, if not all, of these rules have been challenged judicially and Ameren Missouri continues to watch these cases for the final outcomes.
- b. N/A
 - i. N/A

c. N/A

d. N/A

Ameren Missouri
Case Name: ER-2024-0319
Docket No(s): 2024 Electric Rate Review

Response to Discovery Request: SIERRA 2-SC 002.2
Date of Response: 11/20/2024
Witness: N/A

Question: Please refer to the attachments provided in the Company's response to SC 1-4(a) (i.e., 'SC 001.4 Coal CapEX' and 'SC 001.4 Coal O&M').

- a. Are any of the CapEx and O&M projects identified within these attachments included in the Company's Test Year spending as proposed in this case?
- b. If the response to subpart (a) is "yes", please identify each capital and major maintenance project with costs greater than \$1 million that Ameren has included in the Company's Test Year spending as proposed in this case. Please provide this information in machine-readable Excel format with any formulas intact, and include the following information:
- i. the unit and/or plant common area where such project was or would be performed
 - ii. the Company's project ID and project description
 - iii. the actual or projected cost for each of the years included in the Company's Test Year
 - iv. any categorization of the project used by the Company (e.g., "reliability") if such categories exist.
- c. For each capital and major maintenance project identified in subpart (b) above:
- i. Please explain if any spending for the project in years prior to the Test Year has been included in rates—including a breakdown of spending by year and when these costs were approved for rate recovery.
 - ii. Please describe the reason for the expenditure, including supporting analyses and documentation for the expense (including but not limited to a project charter, project scope document, economic analysis, and/or other written evaluation of the costs and benefits of such project).
 - iii. For any economic analysis performed by or for the Company, please provide a copy of the economic analysis and all workpapers and modeling files created, used, or relied on as inputs to that economic analysis—with all analyses and workpapers in machine-readable Excel format with any formulas intact.
 - iv. If an economic analysis was not performed, please explain why not.
 - v. Identify whether the expenditures would be necessary if the plant were to retire sooner than currently planned, and in what retirement year they would be avoidable.
 - vi. If the expenditure would be necessary (i.e., unavoidable), explain why and provide supporting analyses and documentation for this determination.

Response:

Prepared By: Charlie Steib
Title: Sr Finance Regulatory Specialist
Date: 11/20/2024

Subject to Company's objection,

- a. Yes, there were expenditures during the 12 months ending 3-31-24 on all such projects with the exception of project J078W (SX Bottom Ash Pond Closure).
- b. Please see attachment "SC 002.2 Capital OM Projects Over 1M.xls" for list of projects included in Data Request SC 001.4 attachment "SC 001.4 – Cap OM Projects Over 1M- CONF.xls" with spend of > \$1M in the test year of File No. ER-2024-0319.
- c.
 - i. The test year spend for the projects covered by part b was not used to develop any revenue requirement prior to development of the revenue requirement in this case
 - ii. – iv. See attachments to the response to SC1.4.
 - v – vi. See the response to part c.iii to the response to SC 1.4.

* Sierra Club confirmed with Ameren that Ameren's response to SC 2-2 is in fact **not confidential**. *

| Corporation | Utility | Business Division | Plant | Project | Project Description | Project Type | Reason Code | Test Year Spend Amount |
|-------------|---------|-------------------|---------|---------|-------------------------------------|--------------|------------------------------------|------------------------|
| UEC | 1 | 53 | Sioux | 25773 | SX Gypsum Landfill Cell 2 | Capital | 045 - Waste | \$7,412,183.87 |
| UEC | 1 | 58 | Labadie | J0GDH | LBD N Rec Sys Upgrd 2900 TPH Unload | Capital | 005 - Maintain/Improve Reliability | \$3,294,403.73 |
| UEC | 1 | 53 | Sioux | J0R62 | SX 2 Turbine CRVs CVs MSVs 2023 | Capital | 070 - Maintain/Improve Unit | \$2,612,421.28 |
| UEC | 1 | 58 | Labadie | J105M | Labadie 3rd Floor Renovation | Capital | 117 - General Facilities | \$2,343,599.78 |
| UEC | 1 | 58 | Labadie | J0XSK | LBD U3 316 COMPLIANCE | Capital | 052 - Aquatic Life | \$2,041,848.32 |
| UEC | 1 | 53 | Sioux | J0GDQ | SX Crusher Feeder Upgrades | Capital | 005 - Maintain/Improve Reliability | \$1,893,722.37 |
| UEC | 1 | 53 | Sioux | J110R | Sx U2 Bottom Ash Sys Enhancement | Capital | 005 - Maintain/Improve Reliability | \$1,611,014.85 |
| UEC | 1 | 53 | Sioux | J110Q | Sx U1 Bottom Ash Sys Enhancement | Capital | 005 - Maintain/Improve Reliability | \$1,541,853.26 |
| UEC | 1 | 53 | Sioux | J0R2D | SX Ground Water Improvement | Capital | 006 - Regulatory Compliance | \$1,401,826.32 |
| UEC | 1 | 58 | Labadie | J0Z73 | LBD A Freight Elevator Replacement | Capital | 117 - General Facilities | \$1,358,486.01 |
| UEC | 1 | 58 | Labadie | J0XSL | LBD U4 316 COMPLIANCE | Capital | 052 - Aquatic Life | \$1,297,949.60 |
| UEC | 1 | 58 | Labadie | J0T8J | LBD Coal Receiving Pit Steel Bridge | Capital | 070 - Maintain/Improve Unit | \$1,240,942.42 |
| UEC | 1 | 58 | Labadie | J0W8K | LBD - REPL 657E Coal Pile Scraper | Capital | 070 - Maintain/Improve Unit | \$1,124,199.42 |
| UEC | 1 | 58 | Labadie | J105N | Labadie 4th Floor Renovation | Capital | 117 - General Facilities | \$1,121,305.92 |
| UEC | 1 | 58 | Labadie | J0X4K | LBD - D10T Dozer | Capital | 117 - General Facilities | \$1,049,895.00 |
| UEC | 1 | 53 | Sioux | J0LF0 | SX U2 MBO Boiler Overhaul-J0LF0 | Expense | 095 - Systems Operations | \$4,621,506.53 |