

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Approval of New) File No. ET-2025-
Or Modified Tariffs for Service to Large)
Load Customers.)

NOTICE OF CASE FILING

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its notice under 20 CSR 4240-4.017(1) states:

1. Ameren Missouri intends to file an application for approval of new or modified tariffs respecting service to large load customers:
2. The issues likely to be before the Missouri Public Service Commission in the case may be any issue related to rates, terms, and conditions relating to such service.
3. Ameren Missouri has had one communication with the Office of the Commission that involves the subject matter of service to large loads and that is arguably a communication regarding a “substantive issue” under 20 CSR 4240-4.015(10) that occurred within 90 days prior to the filing of this notice. That communication occurred during a panel discussion at which Ameren Missouri employees appeared and where Commissioners were present at the December 12, 2024, Midwest Energy Policy Series meeting involving Economic Development. Consequently, the Company is including the presentation made at the referenced meeting and a summary of the communication as required by 20 CSR 4240-4.017(1).

(Signature block on following page)

Respectfully submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261
Director and Assistant General
Counsel

/s/ James B. Lowery

James B. Lowery, MO Bar # 40503
JBL Law, LLC
9020 S. Barry Road
Columbia, MO 65201
Telephone: (573) 476-0050
lowery@jblawllc.com

**ATTORNEYS FOR UNION
ELECTRIC COMPANY d/b/a
AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 12th day of December, 2024.

/s/ *James B. Lowery*

James B. Lowery

Summary of Communication

On December 11, 2024, Ameren Missouri Sr. Director of Economic, Community, and Business Development Rob Dixon and Ameren Missouri Sr. Director of Regulatory Affairs Steve Wills were part of a panel at a Midwest Energy Policy Series Economic Development meeting attended by Commission Chair Kayla Hahn.¹ The communications were not specific to the terms, conditions, or rates at which any one provider might or could serve data centers but did touch on areas that arguably might be evidence that could arise in a case involving such terms, such as discussions around resource planning and resource adequacy and general benefits and challenges for utilities arising from service to large power users.

¹ Other Commissioners or Commission advisors could have participated virtually.

Large Electricity Users/AI Impact Panel

- Frank Caro (Moderator)
 - Polsinelli PC – Shareholder
- Nekabari Goka
 - Google – Lead, Energy Markets & Policy, Americas
- Rob Dixon
 - Ameren Missouri – Senior Director of Economic, Community, and Business Development
- Steve Wills
 - Ameren Missouri – Senior Director of Regulatory Affairs



What a law firm
*should be.*TM

Large Users & AI Impact

KEY TERMS

- Data Center – physical facility that houses critical computing and storage resources for an organization that enables delivery of shared applications and data. Key components include routers, switches, firewalls, storage systems, servers, and application-delivery controllers.
- IRP – Integrated Resource Plan – an assessment from a utility of future electric needs and its plan to meet those needs.
- CTT – Clean Transition Tariff – Rate design mechanism pioneered by Google to compensate utility for clean power used by large industrial consumer(s).
- Demand Response – tool used to encourage consumers to reduce or shift electricity usage during peak periods

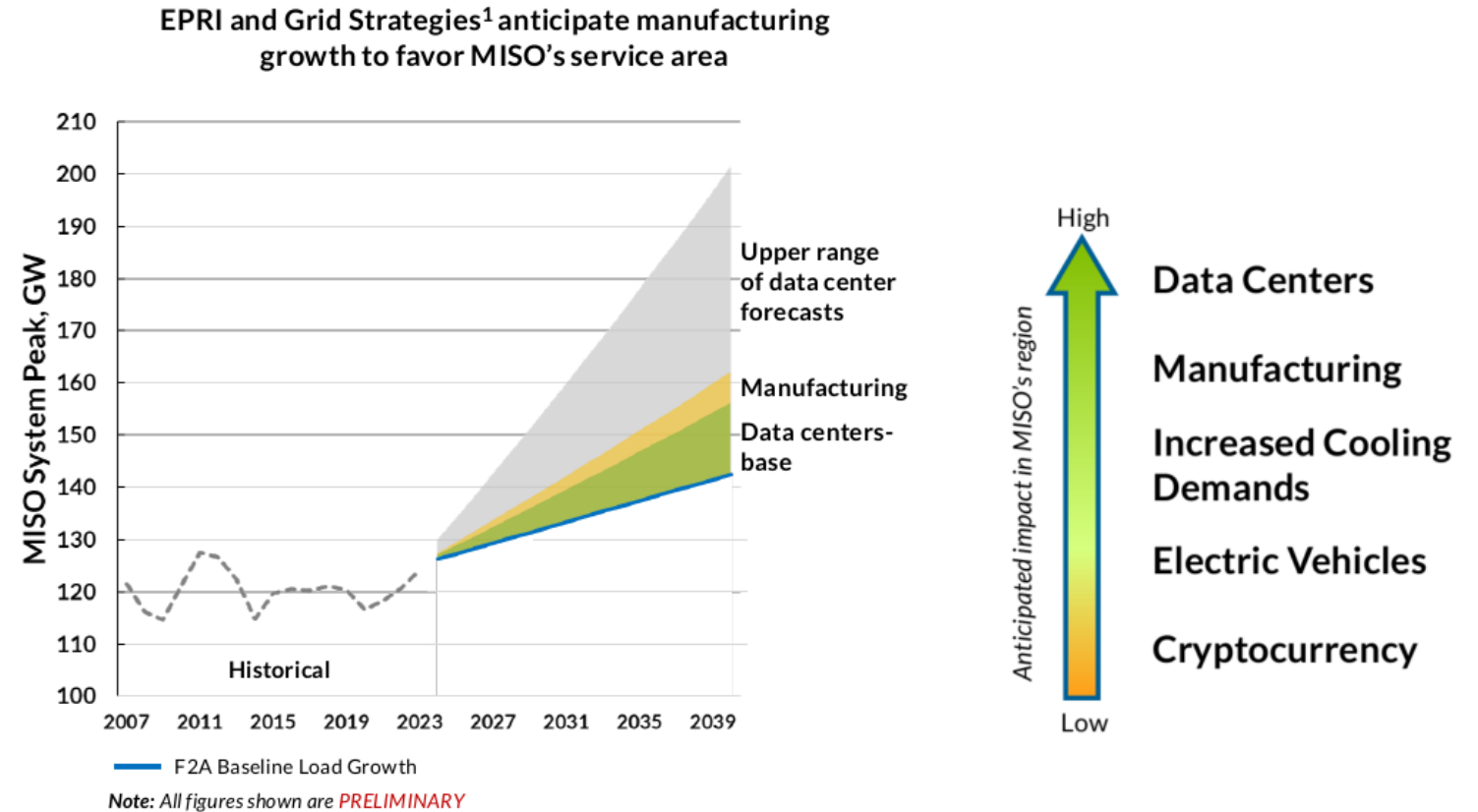


Demand Growth – Data Centers & Electrification

- The impact of data centers on power demand will be significant. Estimates vary:
 - Goldman Sachs – 47 gigawatts (GW) by 2030
 - Brattle Group – 16 GW by 2030
 - Grid Strategies – 9-13 GW by 2027
- Onshoring of manufacturing and industrial electrification (hydrogen, carbon capture, etc.) are estimated to grow demand 36 GW by 2030, according to the Brattle Group.

Demand Forecasting in MISO

5-year peak load growth forecasts from grid planners have almost doubled since last year, driven mostly by data centers and manufacturing



Source: MISO / OMS Survey (2024)

Data Center Announcements in Missouri

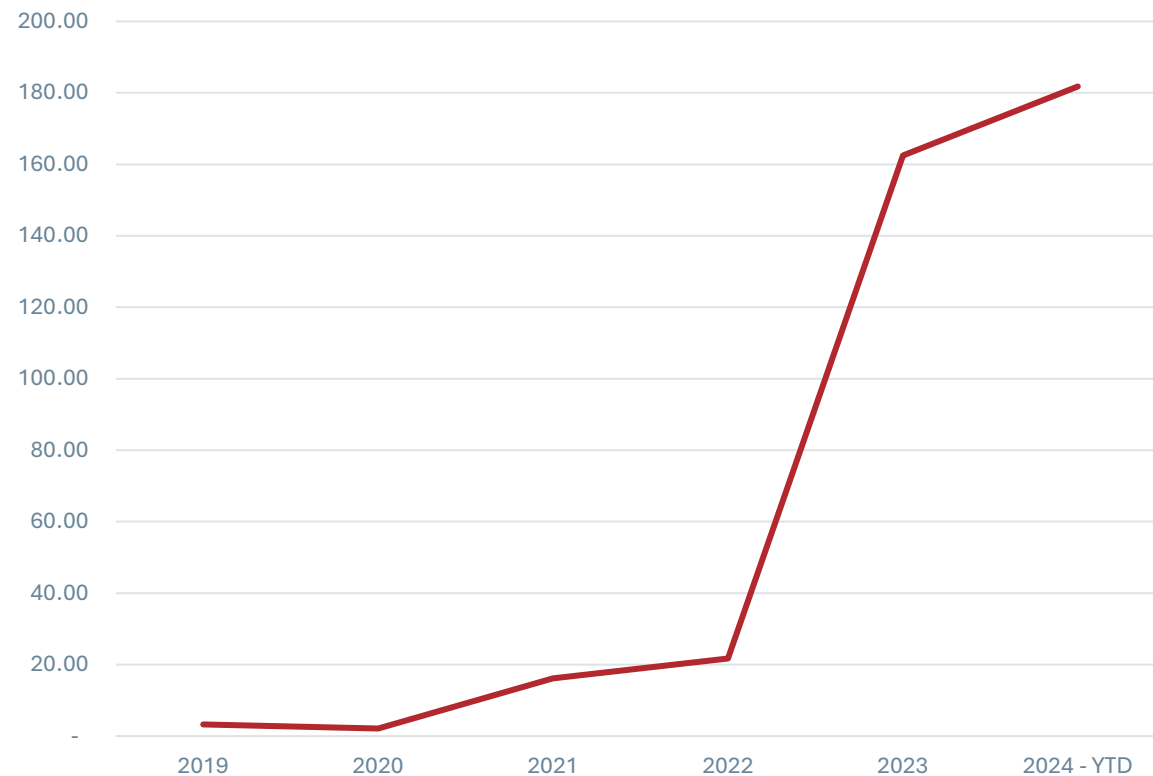
- Kansas City
 - Google – 400 MW data center (\$1 billion)
 - Meta - \$800 million data center
 - Patmos – 100 MW data center (Kansas City Star building)
- St. Louis
 - Tierpoint – 20 MW facility (NSI Building) in addition to three other facilities
 - Netrality – 16 MW facility

Demand Increasing for Economic Development Projects

2019 – Average project size was 3.2 MW

Today – Average project size is 181.2 MW

Average Demand (MW) of New Economic Development Projects Evaluating a Location in Ameren Missouri Service Territory



Source: Ameren Missouri

Key Issues with Large Industrial Users and Data Centers

- Business considerations when siting data centers or large industrial projects
- Economic development opportunities with data centers and large industrial end users
- Resource Adequacy
- Benefits & challenges from a utility perspective of large power users

Contact Us

- **Frank Caro** (Moderator)
 - Polsinelli PC – Shareholder
 - fcaro@polsinelli.com
- **Nekabari Goka**
 - Google – Lead, Energy Markets & Policy, Americas
 - ngoka@google.com
- **Rob Dixon**
 - Ameren Missouri – Senior Director of Economic, Community, and Business Development
 - rdixon@ameren.com
- **Steve Wills**
 - Ameren Missouri – Senior Director of Regulatory Affairs
 - swills@ameren.com