

**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)	<u>File No. EF-2024-0021</u>
Securitized Utility Tariff Bonds for Energy)	Tariff Tracking No. JE-2025-0093
Transition Costs related to Rush Island)	
Energy Center)	

STAFF COMPLIANCE TARIFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission, and for its Compliance Tariff Recommendation (“Recommendation”) ordered in the *Order Directing Staff to Submit Ducera Report and an Expedited Staff Recommendation* (“Order”) issued by the Commission by delegation of authority on December 12, 2024, respectfully states as follows:

1. The Order directed, in part, that “No later than close of business Friday, December 13, 2024, Staff must provide the Commission with Ducera’s opinion on the Securitized Utility Tariff Bond issuance as well as pleadings containing a brief statement of Staff’s opinion and any concerns Staff has with the final terms of the Securitized Utility Tariff Bonds and **Staff’s recommendation about Ameren Missouri’s compliance tariff**, Tracking No. JE-2025-0093.” (emphasis added) [the IAL and the Ducera letter are addressed in a separate pleading filed herein by Staff]

2. Ameren Missouri filed the compliance tariff sheet referenced in the Order on December 11, 2024, with a requested effective date of December 20, 2024, which was assigned Tariff Tracking File No. JE-2025-0093.¹

¹ **UNION ELECTRIC COMPANY ELECTRIC SERVICE, MO.P.S.C. Schedule No. 6**, 5th Revised Sheet No. 90.4 Cancelling 4th Revised Sheet No. 90.4

3. Staff reviewed the tariff sheet² filed by Ameren Missouri in Tariff Tracking File No. JE-2025-0093 and has determined that it is in substantial compliance with the Commission's *Amended Report and Order* issued August 7, 2024 (the "Financing Order"), and accordingly recommends that the Commission allow said tariff sheet to go into effect by operation of law as requested by Ameren Missouri.

4. For purposes of this Recommendation, the information used in preparing this Recommendation may have been obtained from or through the utility, the issuer, the underwriters, Staff's advisors, the Issuance Advice Letter, the certifications, public sources or otherwise. Staff has assumed and relied upon, without undertaking any independent verification of, the accuracy and completeness of all of the factual, financial, and other information supplied or otherwise made available to, discussed with, or reviewed by Staff (including information that is available from generally recognized public sources), and Staff assumes no liability therefor. Staff has further assumed that all of the information furnished by the underwriters, the utility, the issuer and any other person (including, for the avoidance of doubt, the certifications) is complete and accurate as of the date hereof (except to the extent superseded by other information provided prior to the date hereof) and does not contain any material omissions or misstatement of material facts.

Staff assumes no responsibility for and expresses no view as to any projected financial data relating to the utility or the issuer, or the assumptions on which they are based, including, but not limited to, any assumptions made regarding energy sales forecasts, ratepayer payment and charge-off patterns, defaults by third party suppliers, or

² See Footnote 1.

servicing or administrative costs. With respect to any market data, projections, forecasts, and estimates, Staff has assumed that they have been reasonably prepared on bases reflecting the best currently available estimates and good faith judgments of the utility, the issuer, and underwriters.

Staff has assumed that the utility and the issuer will implement the transaction in accordance with the terms of the Financing Order and the transaction documents. Staff expresses no view regarding the sufficiency of true-up adjustments or other actions that the utility or the issuer are required to take under the transaction documents and the Financing Order.

WHEREFORE Staff submits this Recommendation in compliance with the Commission's *Order Directing Staff to Submit Ducera Report and an Expedited Staff Recommendation*³ issued December 12, 2024, and prays the Commission accept same.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Deputy Counsel

Jeffrey A. Keevil

Missouri Bar No. 33825

Missouri Public Service Commission

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Attorney for the Staff of the
Missouri Public Service Commission

³ As noted in paragraph 1 above, the IAL filed by Ameren Missouri and the Ducera letter are addressed in a separate Staff pleading.

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 13th day of December 2024.

/s/ Jeffrey A. Keevil

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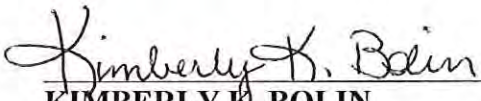
Case No. EF-2024-0021
Tracking No. JE-2025-0093

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 *Staff Compliance Tariff Recommendation*; 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 13th day of December 2024.



Notary Public

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070
