

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

In the Matter of Staff’s Investigation of Matters)
Concerning the Rush Island Energy Center)
Belonging to Union Electric Company d/b/a)
Ameren Missouri)

File No. EO-2022-0215

STAFF RESPONSE TO ORDER SETTING TIME FOR RESPONSES

COMES NOW Staff of the Missouri Public Service Commission and submits the following Response to the Commission’s *Order Setting Time for Responses* (the “Order”) issued herein on January 24, 2025:

1. The Order provided that “Any responses to Ameren Missouri’s motion to cease monthly Rush Island reporting are due no later than February 4, 2025.”

2. Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or “Company”) motion to cease monthly Rush Island reporting claimed that “Further reporting is unlikely to provide the Commission with additional, useful information.” However, the most recent monthly report filed by Ameren Missouri, filed herein on January 15, 2025, recognized that several projects – some of which Ameren Missouri referred to as “safe closure work” – remain to be completed as part of the Rush Island retirement and/or to ready the site for decommissioning. This includes the following:

- Final Statcom is planned to be in service June 2025
- Draining of oil from plant equipment continues.
- Plant washdowns to remove CCR material continues including boilers, silos, etc.
- Continuing with the removal of all hazardous wastes (Antifreeze, feedwater chemicals, etc.)
- Installation of temporary power to critical areas such as stack & river lighting, sumps pumps, etc. is in progress.
- Asbestos survey of the plant continues.

- All equipment is being de-energized and Worker Protection Assurance devices installed
- The remaining storeroom items are out for bid from vendors for removal. The transfer of pre-determined usable assets to other locations is continuing.

3. While Staff does not oppose elimination of the current *monthly* reporting requirement, Staff believes that Ameren Missouri should be required to provide updates on the foregoing activities as they become available.

WHEREFORE, Staff requests the Commission issue an order ordering Ameren Missouri to file reports containing updates on the activities set forth in paragraph 2 above as such updates become available and making such further orders as the Commission deems just and reasonable; or, in the alternative, the Commission could deny Ameren Missouri's motion to cease monthly Rush Island reporting.

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 4th day of February 2025.

/s/ Jeffrey A. Keevil