

**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 an Order        )  
Authorizing the Issue and Sale of Additional        )  
Long-Term Indebtedness                                )  
**File No. EF-2025-0135**

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and pursuant to the January 13, 2025, *Order Directing Staff to File Recommendation*, states as follows:

1. On January 10, 2025, the Union Electric Company d/b/a Ameren Missouri (“Ameren” or “Applicant”) filed its *Motion for Expedited Treatment and Application for Financing Authority* (Application).<sup>1</sup>

2. Ameren requested that the Commission:

- a. Approve Ameren’s application authorizing its financing request to issue and sell up to \$500,000,000 aggregate principal amount of additional long-term indebtedness.
- b. Approve its request expeditiously, by February 27, 2025, so that it may conduct its requested financing(s) on and after March 9, 2025.<sup>2</sup>

3. On January 13, 2025, the Commission ordered Staff to file its *Recommendation* or a request for an extension of time no later than January 27, 2025. Staff requested an

---

<sup>1</sup> § 393.180, RSMo. provides that the power of electrical corporations to issue stocks, bonds, notes and other evidences of indebtedness shall be exercised as provided by law and under such rules and regulations as the commission may prescribe.

<sup>2</sup> The Applicant complied with 20 CSR 4240-2.080(14) requiring requests for expedited treatment to include ‘Motion for Expedited Treatment’ in the title of the pleading.

20 CSR 4240-2.080(14)(A)–(C) required the Applicant to include the Commission’s requested date to act, the harm avoided, the benefit accrued, or the absence of negative effects on customers or the general public, along with the justification of its claims. The pleading must also state that it was filed as soon as possible, with an explanation if it was not.

extension to file its recommendation and the Commission granted Staff's request on January 27, 2025. The Commission then ordered Staff to file its recommendation no later than February 14, 2025.

4. Staff reviewed Ameren's application. Staff concludes that the proposed debt issuance complies with § 393.200.1, RSMo. Staff believes that the purposes set forth in the application are reasonably necessary, and operating expenses or income cannot reasonably cover those purposes.<sup>3</sup>

5. In the attached Memorandum, labeled *Appendix A*, Staff recommends that the Commission approve Ameren's application subject to the following seven (7) conditions:

- (1) That nothing in the Commission's order shall be considered a finding by the Commission of the value of this transaction for rate making purposes, and that the Commission reserve the right to consider the rate making treatment to be afforded the financing transaction and its impact on cost of capital, in any later rate proceeding;
- (2) That the Company shall file with the Commission within thirty (30) days of issuance of any financing authorized pursuant to a Commission order in this proceeding, a report including the amount of secured indebtedness issued, date of issuance, interest rate (initial rate if variable), maturity date, redemption schedules or special terms, if any, use of proceeds, estimated expenses, and loan or indenture agreement concerning each issuance. In addition, the Company shall also provide the analysis, to include but not be limited to, indicative pricing information provided by investment banks it performed to determine that the terms for the debt it decided to issue were the most reasonable at the time;
- (3) That the Company shall file with the Commission any information concerning communication with credit rating agencies concerning any such issuance;

---

<sup>3</sup> Staff applies the "not detrimental to the public interest" standard for financing applications. Staff compared the requested amount to the company's stated uses to ensure that long-term financing authority requests are reasonable and support long-term capital investment. Staff assesses the potential impact of the requested financing on the company's credit metrics, taking into account the impact of the parent company's financial risk on the rating of the subject company.

- (4) That the Company be required to file a five-year capitalization expenditure schedule in future finance cases;
- (5) That the Company be required to file in future finance cases, whereby the use of proceeds includes the repayment of short-term debt which cannot be linked to the repayment of long-term debt, a schedule that reconciles short-term debt incurred for purposes of long-term capital projects specifically and individually disclosed in quarterly and annual filings with the Securities and Exchange Commission. For those capital expenditures not categorized in Securities and Exchange Commission filings, Ameren Missouri shall provide an aggregate sum of the miscellaneous expenditures;
- (6) Should any proceeds from the issuance and sale of the New Indebtedness exceed the Applicant's short-term debt balance on the date prior to issuance and be used to fund near-term capital expenditures, the Company will pay appropriate fees to the Commission; and
- (7) That the Commission's grant of authority shall expire one year from the effective date of the order in this proceeding.

**WHEREFORE**, Staff respectfully recommends that the Commission approve Ameren's application in this case, subject to the seven (7) conditions as set out above and in the Staff's recommendation.

Respectfully submitted,

**/s/ Eric Vandergriff**  
Eric Vandergriff  
Associate Counsel  
Missouri Bar No. 73984  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-9524 (Voice)  
Eric.Vandergriff@psc.mo.gov

Staff Counsel for the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 4th day of February, 2025.

**/s/ Eric Vandergriff**