

**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 Acceptance of Its)
Triennial Filing of Cost Estimates for Callaway Energy)
Center Decommissioning, Including the Independent)
Spent Fuel Storage Installation, and Approval of the)
Funding Level of the Nuclear Decommissioning Trust)
Fund)

File No. EO-2023-0448

STAFF POSITION STATEMENTS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”),
by and through the undersigned counsel, and for its *Statement of Positions* respectfully
states as follows:

1. Uncontested Issues:

- a. What will it cost to decommission Ameren Missouri’s Callaway Unit 1 nuclear generating unit and Independent Spent Fuel Storage Installation sited at Ameren Missouri’s Callaway Energy Center at the end of Ameren Missouri’s current Callaway Unit 1 NRC license —October 18, 2044?**

The estimated cost to decommission Ameren Missouri’s Callaway Unit 1 nuclear generating unit and Independent Spent Fuel Storage Installation sited at Ameren Missouri’s Callaway Energy Center at the end of Ameren Missouri’s current Callaway Unit 1 NRC license is \$1,097,947,000 in 2023 dollars.¹

- b. What is the appropriate current annual amount for Ameren Missouri’s ratepayers to contribute to Ameren Missouri’s Callaway Energy Center Nuclear Decommissioning Trust Fund**

¹ Application for Acceptance of Decommissioning Cost Estimates for Callaway Energy Center, Including Independent Spent Fuel Storage Installation, and Approval of Funding Level for Nuclear Decommissioning Trust Fund, Appendix 3; *see also* Staff Recommendation, Attachment A, pg. 1; *see also* Non-Unanimous Stipulation and Agreement, pg. 7, paragraph 3.

**(inclusive of the Independent Spent Fuel Storage Installation)
for that fund to have neither greater nor lesser than the amount
necessary to carry out the decommissioning of Callaway Unit 1
and the Independent Spent Fuel Storage Installation at the end
of the NRC Callaway Unit 1 license life—presently
October 18, 2044?**

The appropriate annual amount for Ameren Missouri's ratepayers to contribute to Ameren Missouri's Callaway Energy Center Nuclear Decommissioning Trust Fund (inclusive of the Independent Spent Fuel Storage Installation) should be adjusted to \$0.²

2. Contested Issues:

- a. Is it reasonable for the trustee to continue to maintain a trust fund asset allocation of 65% equities and 35% bonds when the trust balance is currently sufficient to cover the estimated decommissioning costs in the most recent triennial filing?**

Yes. This is the only proposed allocation, and complies with Commission Rule 20 CSR 4240-20.070(5)(E)3, which states:

A utility's total book value of investments in equity securities shall not exceed sixty-five percent (65%) of the trust funds' book value...

As also noted in the *Staff Recommendation*, this allocation will be maintained until the fund begins to de-risk in 2040; at that time, the total projected 5-year forecast will be shifted to 50% cash and 50% fixed income investments.³

- b. Is it reasonable for the Commission to approve a customer contribution cost trigger of \$50 million before the company**

² Non-Unanimous Stipulation and Agreement, pg. 6, para. 1.

³ Staff Recommendation, Attachment A, pg. 2.

**can request to resume customer contributions to the fund in a
future triennial filing?**

As a signatory to the *Non-Unanimous Stipulation and Agreement*, it is Staff's position that it is reasonable for the Commission to approve the provision limiting Ameren Missouri's ability to request a resumption of customer contributions to the fund in a future triennial filing only if the balance of the trust becomes deficient by \$50 million from the projected cost for decommissioning at the time of the next triennial filing.⁴

WHEREFORE, the undersigned counsel submits these *Staff Position Statements* for the Commission's information and consideration.

Respectfully submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel and/or parties of record on this 18th day of April, 2024.

/s/ Travis J. Pringle

⁴ Non-Unanimous Stipulation and Agreement, pg. 14, para. 9.