

**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)	File No. ET-2025-0184
for Approval of New or Modified Tariffs)	
for Service to Large Load Customers.)	

APPLICATION AND REQUEST FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its *Application for Approval of Ameren Missouri's Large Load Customer ("LLC") Rate Plan and Associated Tariffs*, request for variance, and request for authorization to track program revenues ("Application"), pursuant to Section 393.140(11), RSMo.,¹ 20 CSR 4240-2.060, and 20 CSR 4240-20.100(11), states as follows:

I. APPLICANT

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. Ameren Missouri is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. Ameren Missouri has previously submitted to the Commission a certified copy of its Articles of Incorporation (File No. EA-87-105). The Company's Fictitious Name Registration with the Missouri Secretary of State and its Certificate of Corporate Good Standing are attached hereto and incorporated herein by this reference as Schedules A and B, respectively.

2. Filings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and to:

¹ Statutory references are to the Revised Statutes of Missouri (2016), unless otherwise specified.

Steve Wills
Sr. Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
swills@ameren.com

3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

4. Ameren Missouri has no overdue annual report or assessment fees.

5. A 60-day notice with respect to authority sought herein was filed on December 12, 2024, and assigned the above-captioned file number.

II. BACKGROUND

6. This Application seeks an order from the Commission approving, on or before December 31, 2025, the Company's LLC Rate Plan, all accompanying new and modified tariffs, as well as any additional or conforming tariff changes that are identified through the course of this proceeding that are needed to implement the LLC Rate Plan.

7. In support of this Application, Ameren Missouri is filing Direct Testimony from the following witnesses:

- Mr. Ajay K. Arora: Mr. Arora is the Company's lead policy witness.

His testimony addresses several topics, including those described below. He discusses the marketplace driving new large customer loads across the country and in Missouri, explaining the transformational opportunity these loads present for the state of Missouri, and the specific interest the Company is seeing from large load customers looking to

locate in the Company's service territory. Mr. Arora also discusses the key principles that underpin the LLC Rate Plan, including competitively meeting the needs of these customers to obtain the benefits they will bring to the state. Moreover, Mr. Arora also discusses the Company's risk analysis, the details of which are addressed in Mr. Wills' testimony, which provides a sound basis for the Commission to determine that new large load customers will pay their fair share of the costs incurred to serve them via revenues the LLC Rate Plan requires, ensuring that there is no cross subsidization across and within customer classes.

- Mr. Steven Wills: Mr. Wills addresses the details of the tariffs filed as part of the LLC Rate Plan, including their interrelationship and how they work together. Mr. Wills also discusses how the Company has evaluated the LLC Rate Plan consistent with SB No. 4's² requirements that large load customer tariffs be designed with the expectation that such customers will pay their representative share of costs incurred to serve them and that no unjust and unreasonable costs associated with their service will be paid by other customers. Mr. Wills also addresses the variance request reflected in this Application.
- Mr. Matt Michels: Mr. Michels addresses key resource planning considerations underlying the evaluation Mr. Wills discusses in his

² See Subsection 7 of Section 393.130, enacted by Senate Bill No. 4 (passed by the 2025 Missouri General Assembly), which was signed by Governor Kehoe on April 9, 2025, and which will take effect prior to the application of the LLC Rate Plan to any customer.

testimony and addresses the Company's capacity position with expected loads from large load customers.

- Mr. Robert B. Dixon: Mr. Dixon discusses the significant economic development considerations that are important for the state in capturing the significant benefits arising from customers that would fall under the LLC Rate Plan are expected to bring to Missouri, the recent trends being seen with respect to such customers in Missouri, and the benefits of attracting large load customers to the state.

III. REQUEST FOR APPROVAL OF LLC RATE PLAN

8. Ameren Missouri developed the LLC Rate Plan through a multi-year effort designed to (a) attract large load customers who are today presenting a once-in-a-lifetime opportunity to enhance the state's long-term economic development and competitiveness, and (b) to do so in a manner that minimizes any risk associated with adding loads of the magnitude expected to qualify under the LLC Rate Plan consistent with state law. The LLC Rate Plan equitably, efficiently, and transparently will enable Ameren Missouri to support state economic development policies and priorities. The Plan rests on the Company's existing Service Classification No. 11(M) ("LPS") service classification, modified to account for and address the unique characteristics of large load customers and to do so in a manner that fairly protects non-large load customers from undue risk. The Plan is also designed to meet the large load customers' unique needs.

9. The Plan is being proposed because of the substantial economic investment and development expected in the near- to intermediate-term in Ameren Missouri's service territory, and the dramatic growth these developments are expected to bring in Ameren Missouri's load.

10. The LLC Rate Plan will apply to customers with loads of 100 megawatts (“MW”) or more, to be served at a transmission voltage of at least 115 kilovolts (“kV”). Specific provisions added to the existing LPS tariff will govern the large load customers’ service, together with other new tariffed programs, the primary purpose of which is to meet such customers’ need for clean and renewable energy, including programs that could provide additional revenues to offset the general revenue requirement to the benefit of all customers.

11. Specifically, the Company seeks approval of the following new and modified tariffs:

- Modifications to the existing LPS tariff to include additional terms and conditions that will apply to large load customers;
- New riders reflecting programs available to large load customers, as follows:
 - Rider RSP LLC (Renewable Solutions Program – Large Load Customers), which is similar to the Company’s existing, Commission-approved Renewable Solutions Program but with modifications tailored to meet large load customer needs, providing one means for large load customers to obtain Renewable Energy Credits (“RECs”) in support of the clean and renewable energy needs;
 - Rider NEC (Nuclear Energy Credits Program), which is a new program developed as another means of meeting large load customers’ needs for clean energy through the provision to such customers of the clean energy attributes of nuclear energy produced by Company-owned nuclear resources,

similar to how providing RECs to such customers provide them with the renewable energy attributes from Company-owned renewable energy resources;

- Rider CCAP (Clean Capacity Advancement Program), which is a new program allowing large load customers to support energy storage systems that enable the storage of clean energy; and
- Rider CEC (Clean Energy Choice Program), which is a new program that allows large load customers to propose and ultimately cover the costs for advancing supply-side resources that otherwise would not have been pursued by the Company pursuant to its Preferred Resource Plan;
- Approval of changes that will be required to the Company's Rider FAC under the terms of the LLC Rate Plan (to be implemented in the Company's next general rate review).

12. The LLC Rate Plan will provide numerous benefits, including:

- Providing fair and competitive service terms needed to attract these large and beneficial investments to the state;
- Creating an appropriate framework that provides reasonable assurance that large load customers will pay their representative share of the costs incurred to serve them and that unjust or unreasonable costs will not be imposed on others;

- Drastically increasing gross receipts tax collections in the applicable local jurisdictions, which provide valuable revenues for political subdivisions that host new large load facilities;
- Providing other tax revenues, including sales and use taxes associated with the investments, property taxes, and taxes generated by the thousands of construction workers who will construct these facilities;
- Creating thousands of construction jobs and hundreds of permanent operations and maintenance jobs at the customers' facilities; and
- Contributions by the large load customers to pay down balances on the Company's existing securitized utility tariff bonds.

13. The LLC Rate Plan also contains numerous provisions to ensure that the Company can obtain these beneficial loads while ensuring other customers are not exposed to undue risks. These include minimum term provisions, exit fee requirements should a large load customer not remain on the system for the full term, minimum load obligations to ensure a set level of revenues, and financial security provisions to ensure those revenues are paid. Large load customers must also execute and deliver an Electric Service Agreement, which is to be approved by the Commission, which also provides a means for such customers to commit to additional revenues associated with the riders included in the LLC Rate Plan, as well as including the requirement that the related agreements are also to be approved by the Commission. This gives the Commission the ultimate authority to ensure that service to a given large load customer project is consistent with SB No. 4 requirements.

IV. REQUEST FOR VARIANCE

14. As discussed in Company witness Wills' Direct Testimony, large load customers may participate in clean energy programs that are a part of the LLC Rate Plan and thus, by definition, be served with renewable energy. The Company's Renewable Energy Standard ("RES") requirement ensures that a specified percentage (15%) of the Company's load is served by renewable energy. The process these customers go through to participate in clean energy programs and the Company's RES compliance efforts should act in concert to avoid a possible duplication of effort and a possible retirement of more renewable energy credits ("RECs") than there was load to serve. To prevent this situation, the Company seeks a variance from certain RES rule requirements, similar to a variance granted by the Commission in an earlier case for similar reasons. See *Second Amended Report and Order*, File No. EO-2022-0061 (involving Evergy West).

15. The specific variance sought is to exclude from the RES rule's definition of "total retail electric sales," as defined in 20 CSR 4240-20.100(1)(W), that part of the large load customer's load that is supported with renewable attributes it receives or is reasonably projected to receive that is are sufficient to cover the applicable "RES portfolio requirement" as defined in 20 CSR 4240-20.100(1)(R). The 11(M) exemplar tariff attached to Mr. Wills' Direct Testimony is part of Schedule SMW-D1.

V. REQUEST FOR AUTHORIZATION TO TRACK PROGRAM REVENUES AND TERMINATION FEES

16. The Company also requests that the Commission authorize it to defer and track revenues received under Riders RSP-LLC, NEC, and CCAP, and any termination (and capacity reduction) fees received under the provisions of Section 8 of the revised LPS tariff proposed in this docket. As described in witness Wills' Direct Testimony, this is necessary to ensure that the

revenues from participants in those programs, and any termination/capacity reduction fees, are fully captured for the benefit of all customers in the form of reduced revenue requirements in future electric rate reviews.

WHEREFORE, Ameren Missouri respectfully requests that the Commission approve its proposed LLC Rate Plan, the accompanying new and modified tariffs, grant the requested variance, and authorize the program revenue tracking mechanism outlined herein, and that it do so by issuing a final approval order by December 31, 2025, including therein any findings necessary to grant Ameren Missouri's requested relief.

Respectfully submitted,

/s/ **James B. Lowery**

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

VERIFICATION

The undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Application* is true and correct to the best of his knowledge, information, and belief.

The undersigned further states that this request is substantially consistent with the Company's current Preferred Resource Plan.

/s/ Ajay K. Arora

Ajay K. Arora, Sr. Vice-President
and Chief Development Officer
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 14th day of May, 2025.

/s/ *James B. Lowery*

James B. Lowery

Schedule A



State of Missouri
Robin Carnahan, Secretary of State

File Number: 201025290083

X01083980

Date Filed: 09/09/2010

Expiration Date: 09/09/2015

Robin Carnahan

Secretary of State

Registration of Fictitious Name

This fictitious name filing shall expire 5 years from the date filed unless a renewal filing is submitted within 6 months prior to the expiration date.

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. (Chapter 417, RSMo)

The undersigned is doing business under the following name, and at the following address:

Business name to be registered: **Ameren Missouri**
Business address: **One Ameren Plaza, 1901 Chouteau**
City, State and Zip Code: **St. Louis MO 63103**

If all parties are jointly and severally liable, percentage of ownership need not be listed.

Name of Owners, Individual or Business Entity	Street and Number	City and State	Zip Code	If listed, Percentage of ownership must equal 100%
UNION ELECTRIC COMPANY	One Ameren Plaza 1901 Chouteau Ave	St. Louis MO	63103	100%

In Affirmation thereof, the facts stated above are true:

(The undersigned understands that false statements made in this filing are subject to the penalties of a false declaration under Section 575.060, RSMo)

Ronald S. Gieseke

(Authorized Signature)

Assistant Secretary

(Authorized Party Relationship)

X001230414
 Date Filed: 09/11/2020
 Expire Date: 10/14/2025
 John R. Ashcroft
 Missouri Secretary of State



State of Missouri

John R. Ashcroft Secretary of State

Corporations Division
 PO Box 778 / 600 W.Main St., Rm. 322
 Jefferson City, MO 65102

Renewal of Fictitious Name

This information is for the use of the public and gives no protection to the name being registered. There is no provision in this Chapter to keep another person or business entity from adopting and using the same name. The fictitious name registration expires 5 years from the filing date. (Chapter 417,RSMo)

Submission Type Renewal
Reference Number SR123305
Receipt Number TR344755

The undersigned is doing business under the following name and at the following address:

Business name: Ameren Missouri

Charter # X001230414

Existing Address: One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri, 63103, United States

Owner Information:

If a business entity is an owner, indicate business name and percentage owned. If all parties are jointly and severally liable, percentage of ownership need not be listed. Please attach a separate page for more than three owners. The parties having an interest in the business, and the percentage they own are:

Name of Owners, Individual or Business Entity	Charter # Required If Business Entity	City and State	If Listed, Percentage of Ownership Must Equal 100%
UNION ELECTRIC COMPANY	00040441	1901 Chouteau Avenue, St. Louis, Missouri, 63103, United States	100.0000

In Affirmation thereof, the facts stated above are true and correct:

The undersigned believes the statements presented in this filing are true and correct to the best of their knowledge and belief, they are subject to the penalties provided under section 575.040 RSMo. for making a false declaration under Section 575.060 RSMo

The undersigned agrees and represents that he/she is authorized to execute this document

Name Craig W. Stensland On Behalf of UNION ELECTRIC COMPANY
Title Owner
Date 09/11/2020

Schedule B

STATE OF MISSOURI



Denny Hoskins
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

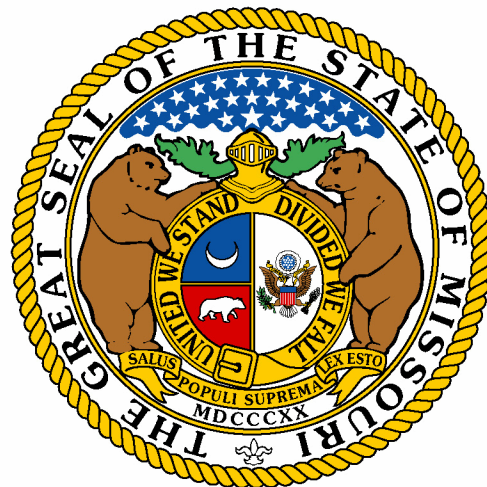
I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

UNION ELECTRIC COMPANY
00040441

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 14th day of February, 2025.

Denny Hoskins
Secretary of State



Certification Number: CERT-02142025-0091