

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

**APPLICATION TO INTERVENE OF GOOGLE LLC**

Pursuant to 20 CSR 4240-2.075, Google LLC (“Google”) hereby files this Application to Intervene in the above-listed matter and states the following:

1. On May 14, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its “Application for Approval of Ameren Missouri’s Large Load Customer (‘LLC’) Rate Plan and Associated Tariffs” in this docket requesting adoption of rates and tariffs applicable to large load customers (defined as customer with loads larger than 100 MW) throughout the service territory of Ameren Missouri (“LLC Rate Plan”).

2. The Missouri Public Service Commission (“Commission”) has issued an Order setting a deadline of June 12, 2025 for interested parties to intervene.

3. Google is a limited liability company duly incorporated under the laws of the State of Delaware. The Company’s principal office is located at 1600 Amphitheatre Parkway, Mountain View, CA 94043. The contact information for Google’s attorney is set forth below.

4. Google is a U.S.-based technology company that offers technology services and products and operates multiple data centers in the country and around the world to power its portfolio of products and services.

5. Google is currently developing a data center in the Kansas City area (in the service territory of Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM,” and together with its

affiliates, “Evergy”). Google is interested in this docket as its future energy spend may be impacted by the outcome of this proceeding should it elect to explore development of a data center within the Ameren Missouri service territory and to the extent this proceeding influences ratemaking principles applicable to large-load customers throughout the region.

6. Data center facilities that Google develops are likely to support loads exceeding 100 MW. As such, Google may qualify for the LLC Rate Plan at a future data center location within the Ameren Missouri service territory. Given that Google may qualify as a customer under the LLC Rate Plan, it has an interest in this proceeding different from that of the general public and therefore meets the requirements of 20 CSR 4240-2.075(3)(A).

7. Granting Google’s intervention will also serve the public interest by assisting the Commission’s record for decision in this case as to how the LLC Rate Plan may benefit the state and local economy through attracting customers like Google to Missouri and what modifications to the LLC Rate Plan may enhance the realization of those benefits.

8. In addition, Google has experience in acquiring power and taking electric service in jurisdictions around the country. Google has also participated in similar tariff proceedings in several other states. By allowing Google’s intervention, the Commission can use that knowledge and experience to decide the case in a manner that best serves the public interest. Google’s intervention therefore meets the requirements of 20 CSR 4240-2.075(3)(B).

9. The Commission recently granted Google’s intervention in Evergy’s parallel proceeding establishing large load rates within its jurisdictions (Case No. EO-2025-0154).<sup>1</sup> Google’s grounds for intervention are essentially the same here as there. Google was also granted

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<sup>1</sup> Order Granting Applications to Intervene, Case No. EO-2025-0154 (Mar. 20, 2025).

intervention in other Commission dockets on very similar grounds.<sup>2</sup> Accordingly, Evergy meets the requirements of Commission Rule 20 CSR 4240-2.075 regarding intervention and granting Google's intervention request is in the public interest.

10. Pursuant to 20 CSR 4240-2.075(2)(F), Google states that, at this early stage in the proceeding, Google is unsure of the position it will take on the details of the LLC Rate Plan because it is still analyzing the LLC Rate Plan and will require additional background information to determine if the LLC Rate Plan is reasonable as presented or if it requires modifications. Google expects this background information to be shared during the discovery component of this docket.

11. It is expected that Google will have the facts necessary to form a position on the details of the LLC Rate Plan at some stage during or after the discovery phase.

12. Should the Commission grant this Application, notices and other correspondence in this case should be directed to the following persons:

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<sup>2</sup> EO-2022-0061 (establishing Special High Load Factor Market Rate for Evergy Missouri West, Inc. ("EMW")), EO-2023-0022 (establishing Special High Load Factor Market Rate for EMM), and EO-2023-0212 and 0213 (Evergy IRP Update Dockets).

Respectfully submitted,

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By: /s/ Frank A. Caro

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ATTORNEYS FOR GOOGLE LLC

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed to all parties of record this [ ]th day of May, 2025.

/s/ Frank A. Caro