

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

Application of Union Electric Company d/b/a Ameren)	
Missouri for Approval of Decommissioning Cost)	
Estimate for Callaway Energy Center and Funding)	<u>File No. EO-2015-0253</u>
Level of Nuclear Decommissioning Trust Fund.)	

**STAFF RESPONSE TO COMMISSION ORDER DIRECTING STAFF TO FILE
RECOMMENDATION AND AUTHORIZING STAFF TO REQUEST ADDITIONAL TIME**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the Staff Counsel's Office, and states that on April 1, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its cost study detailing its latest cost estimate for decommissioning its Callaway Energy Center (nuclear power plant). Ameren Missouri asks the Missouri Public Service Commission ("Commission") to accept its cost report, approve its decommissioning cost estimate, continue its annual accrual at current levels, find that Callaway decommissioning costs are included in its current cost of service and are properly reflected in current rates for ratemaking purposes, and confirm that the current annual funding level of \$6,758,605 is based on the parameters and assumptions (economic, financial, and investment) stated in its Application. On April 2, 2015, the Commission issued an Order Directing Staff to File a Recommendation no later than August 1, 2015, and, in the alternative, authorized the filing, no later than August 1, 2015, of a request for additional time for the filing of the Staff's recommendation. In response, the Staff states as follows:

1. Every three years, on September 1, Commission rate-regulated electric utilities with decommissioning trust funds are required to file cost studies detailing the latest cost estimates for the decommissioning of the utility's nuclear plant(s) along with

the funding levels necessary to defray these decommissioning costs. 4 CSR 240-3.185(3); Section 393.292 RSMo. 2000.

2. On August 14, 2014, Ameren Missouri filed with the Commission a Request For Variance Of Date For Decommissioning Cost Estimate Filing And Motion For Expedited Treatment. Ameren Missouri filed a request to allow it to file this report no later than April 1, 2015, due to its license extension request that was pending before the Nuclear Regulatory Commission (“NRC”) and the potential impact of that request to extend the life of its Callaway Energy Center from 2024 to 2044 upon the necessary funding level of its decommissioning trust. The Commission issued an Order Granting Variance on August 27, 2014, in File No. EE-2014-0046.

3. On March 6, 2015, the NRC approved Ameren Missouri’s application for a 20-year operating license extension. The expiration date of the Callaway Energy Center’s operating license is now October 18, 2044. The decommissioning cost estimate and funding adequacy analysis presented with Ameren Missouri’s Application filed April 1, 2015, are based on this extended life of the Callaway Energy Center.

4. The Staff has started work on Ameren Missouri’s April 1, 2015, filing and has engaged in discovery respecting that filing. Due to the press of other Commission cases with deadlines, such as evidentiary hearings and filings involving the Staff’s Financial Analysis Unit, and future scheduled deadlines involving the Staff’s Financial Analysis Unit, the Staff has not completed its work respecting Ameren Missouri’s cost study filed April 1, 2015, detailing the latest cost estimate for decommissioning the Callaway nuclear power plant.

5. Based on the Commission cases with schedules presently pending before the Commission and cases that the Staff anticipates being filed, the Staff respectfully proposes that it file a stipulation and agreement or its recommendation regarding Ameren Missouri's latest cost estimate for decommissioning the Callaway nuclear power plant by November 2, 2015. The Staff has contacted Ameren Missouri and Ameren Missouri has no objection to the Staff's request for additional time to November 2, 2015 to file a stipulation and agreement or its recommendation.

6 The Staff does not make this request to unduly delay this matter or vex the Commission or Ameren Missouri.

7. The Staff apologizes for any inconvenience its request for time to make its filing till November 2, 2015 may cause.

WHEREFORE, the Staff respectfully requests until November 2, 2015, to file a stipulation and agreement or its recommendation regarding Ameren Missouri's latest cost estimate for decommissioning its Callaway nuclear power plant.

Respectfully submitted,

/s/ Steven Dottheim

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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 of record this 31st day of July, 2015.

/s/ Steven Dottheim