

Exhibit No.:	
Issues:	Large Load Tariff
Witness:	Caroline Palmer
Type of Exhibit:	Data Request
Sponsoring Party:	Sierra Club
Case No.:	ET-2025-0184
Filing Date:	September 5, 2025

Missouri Public Service Commission
Case No. ET-2025-0184
Rebuttal Testimony of Caroline Palmer

Exhibit CP-2

Public Company Responses to Data Requests

Sierra Club Data Requests

Ameren Response to SC 1-3, and Attachment "SIERRA_1-SC_001_3-Att-SIERRA 1-SC 001.3 Attachment.xlsx" (provided as a pdf)
Ameren Response to SC 1-4
Ameren Response to SC 1-9
Ameren Response to SC 1-11
Ameren Response to SC 1-13
Ameren Response to SC 1-17

Missouri Public Service Commission (MPSC) Staff Data Requests

Ameren Response to MPSC 0005 (Coversheet Only)
Ameren Response to MPSC 0008

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.3
Date of Response: 9/2/2025
Witness: N/A

Question: Provide Ameren's annual peak demand and total annual energy consumption in each of the past 10 years.

Response:

Prepared By: Dallas Beard
Title: Manager, Risk Analytics
Date: 08/27/2025

See the attached document titled "SIERRA 1-SC 001.3 Attachment.xlsx" for the total energy and peak at generation from 2015-2024.

Year	Total Load KWh	Peak Demand KW
2015	38,086,377,953	7,647,886
2016	34,965,212,187	7,260,505
2017	33,858,443,302	7,401,336
2018	35,896,302,285	7,103,107
2019	34,476,879,913	6,959,665
2020	32,906,155,302	6,665,995
2021	33,486,468,118	6,958,649
2022	34,290,315,952	7,155,533
2023	32,496,209,693	7,416,811
2024	32,987,147,613	7,196,107

NOTE: Load at Generation

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.4
Date of Response: 9/2/2025
Witness: N/A

Question: Refer to Schedule SMW-D1. Identify the costs (for example, the FERC account numbers and names) that the monthly Customer Charge is designed to recover.

Response:

Prepared By: Tom Hickman
Title: Manager, Rates & Analysis
Date: 8-26-2025

The noted Customer Charge is the Customer Charge for the Large Primary Service class established out of the Company's most recent electric case (ER-2024-0319). Please note, rate changes are subject to Missouri PSC approval (in this case in the form of PSC approval of a stipulation and agreement). The ultimate rates reflect consideration of Class Cost of Service ("CCOS") studies and numerous other policy-based positions. The currently effective rates were not bound to any specific CCOS. Despite these facts, the Company maintains that it prepares and presents a reasonable CCOS and in so much as there is no other way to reasonably answer this question, the Company will utilize its CCOS to do so. Also note that to strictly follow the Company's CCOS from the most recent case, the LPS Customer Charge would be higher than it currently is.

Based on the Company's CCOS, the following costs (identified specifically in cases of direct cost inputs and in more broad categories when the impact is more indirect) are included in a cost-based Customer Charge:

The depreciation and rate of return associated with certain Distribution capital accounts (FERC Majors 370 and 373) and the depreciation and rate of return associated with customer-related portions (based on the minimum distribution system allocation approach) of certain other Distribution capital accounts (364, 365, 366, 367).

The depreciation/amortization and rate of return (where applicable) associated with an allocation of various General and Intangible plant, made under the basis of other plant allocated as customer-related described above.

The following O&M Categories:

A portion of Distribution O&M Accounts allocated under the basis of customer-related distribution plant allocations described above.

Customer-Related portions FERC Majors 580, 581, 586, 587, 588, 589, 590, 593, 594, and 598

FERC Majors 583, 584, and 597

Customer Account Expenses

FERC Majors 901, 902, 903, 904, and 905

Customer Services & Sales Expenses

FERC Majors 907, 908, 909, 910, 911, 912, 913, 916

A portion of other Administrative and General Expenses and certain taxes allocated to the extent other expenses and plant were allocated.

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.9
Date of Response: 9/2/2025
Witness: N/A

Question: Refer to Wills Direct Testimony, p.12 regarding minimum demand charges. Will the “contract capacity...spelled out for the customer's ramp period” have specified capacity milestones that increase over time, leading up to the full contract capacity? If yes, will the minimum level of demand charges apply to the specified capacity milestones the during the customer’s ramp period? If no, why not?

Response:

Prepared By: Jared Schneider
Title: Product Development Manager
Date: 8/20/25

Yes. Please refer to section 6.2 of the form ESA filed in Steve Wills direct testimony. The customer will be required to provide a ramp demand by quarter over the ramp period. Once the ESA is approved by the Commission this will be the ramp demand for which the minimum demand charges will apply over the ramp period.

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.11
Date of Response: 9/2/2025
Witness: N/A

Question: Refer to Wills Direct Testimony, p.13 and Schedule SMW-D1 regarding termination.

- a. Why does the Company allow reduction in maximum LLC capacity only after the first five years of the ESA, but allows termination at any time during the term of the ESA?
- b. If a customer terminates its ESA in year 3 of a 5-year ramp period, will it pay minimum demand multiplied by demand charges for the remaining 2 years of the ramp period, plus 5 calendar years? Or will it only pay demand charges for the remaining 2 years of the ramp period plus 3 calendar years?
- c. If the Company sells wholesale capacity in the Midcontinent Independent System Operator markets today, how does the Company currently allocate among its customer classes the revenues associated with those sales?
- d. Why does the company require payment of termination fees for at most 5 calendar years after the termination date, rather than the remaining term (if longer than 5 years)?

Response:

Prepared By: Jared Schneider
Title: Product Development Manager
Date: 8/27/25

- a) Please see the response to DR SC 001.8 (b).
- b) If a customer terminates its ESA in year 3 of a 5 year ramp period, the customer would be required to pay minimum demand charges for the remainder of the ramp period plus 5 calendar years.
- c) A base amount of net wholesale capacity sales (both capacity purchases and sales are included in the revenue requirement, and are allocated similarly, such that the effect is the same as though the costs and revenues had been netted prior to allocation) is included in the revenue requirement used to set base rates. The Company's Class Cost of Service Study ("CCOS") allocates those revenues, along with all other revenues in account 447, to the various classes using an energy allocator. The costs actually reflected in rates do not necessarily strictly follow the Company's CCOS results, but rather may reflect Commission decisions and/or settlement agreements that reflect consideration of other parties' CCOS results and/or policy considerations. 95% of changes in the level of net capacity sales (excluding capacity purchases with a term of greater than 1 year) that are experienced subsequent to the establishment of a base amount are passed through

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.13
Date of Response: 9/2/2025
Witness: N/A

Question: Refer to Wills Direct Testimony, p.21.

- a. Confirm if the energy storage capacity that the customer would support under Rider CCAP would have already been procured by the Company regardless of the customer's payments.
- b. How will the Company determine the price per MW (or kW) that the customer will pay each month?

Response:

Prepared By: Jared Schneider
Title: Product Development Manager
Date: 8/26/25

- a) Confirmed.
- b) Please see the response to MPSC DR 0029.

the Company's Fuel Adjustment Clause, which implicitly allocates those costs on a loss-adjusted energy basis.

- d) Please see the response to DR SC 001.8 (b).

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: SIERRA 1-SC 001.17
Date of Response: 9/2/2025
Witness: N/A

Question: Refer to Wills Direct Testimony, p.34-35.

- a. Identify the costs reflected in the LPS rate that are distribution-related and provide the underlying rate design workpapers that the Company used for identifying those costs in live, unlocked Excel file format with all links and formula intact.
- b. Identify the costs reflected in the LPS rate that are transmission-related and provide the underlying rate design workpapers that the Company used for identifying those costs in live, unlocked Excel file format with all links and formula intact.
- c. Do the values in Table 3 reflect the monthly credit of \$1.47/kW of billing demand that LLC customers will receive through Rider B? If not, provide updated values that account for the impact of these credits on the Residual Revenue Requirement Impact, as well as the underlying workpapers in live, unlocked Excel file format with all links and formula intact.

Response:

Prepared By: Tom Hickman
Title: Manager, Rates & Analysis
Date: 8-26-2025

The noted LPS rate was established out of the Company's most recent electric case (ER-2024-0319). Please note, rate changes are subject to Missouri PSC approval (in this case in the form of PSC approval of a stipulation and agreement). The ultimate rates reflect consideration of Class Cost of Service ("CCOS") studies and numerous other policy-based positions. The currently effective rates were not bound to any specific CCOS. Despite these facts, the Company maintains that it prepares and presents a reasonable CCOS and in so much as there is no other way to reasonably answer this question, the Company will utilize its CCOS to do so. Also note that to strictly follow the Company's CCOS from the most recent case, the LPS rates would be lower than they currently are. Given this fact, it's reasonable to assert that all costs allocated to the LPS customer class in CCOS are at least included in the rate being charged, although the revenue above and beyond CCOS is ambiguous in terms of cost-causation.

Please refer to attachment "MO ECCOS_2024 Final". This is the filed Company CCOS from ER-2024-0319. Refer to tab "Unbundled". Cells AX76 through AX80 include the fully functionalized, classified, and allocated values for LPS.

A. Please refer to the above workpaper and cell reference. Distribution costs exist in two values in the referenced cells. Distribution -- Demand costs are all Distribution Costs (including relative allocations of General and Admin type costs) and are in cell AX80. Customer costs include a portion of customer-related distribution costs. These customer-related costs include both items entirely considered customer-related, such as meters, and the customer-related portions of things like Poles and Wires derived from the Company's Minimum Distribution System study. Those costs are included in the value in cell AX76.

B. Please refer to the above workpaper and cell reference. Transmission costs for LPS are in Cell AX79.

C. The values in Table 3 do reflect the Rider B monthly credit.

Ameren Missouri's
Response to MPSC Data Request
ET-2025-0184
Large Load Tariff - Customers

No.: MPSC 0005

Please identify all customers or potential customers that Ameren Missouri is aware of seeking service from Ameren Missouri in excess of 25 MW. Please provide: (a) the voltage at which service is anticipated to be provided, (b) the demands, energy consumption, and load factor anticipated, and any information pertaining to how these amounts are expected to vary over time, (c) the location of the interconnection point with existing Ameren Missouri facilities that is anticipated, (d) whether any new or additional substation or switching equipment is expected to be necessary, and if so, fully describe the new or additional substation or switching equipment, (e) the types and quantities of expected transmission and/or distribution conductors, overhead devices, underground devices, poles, and conduit necessary to connect the customer, (f) the expected costs, including labor and installation, by expected FERC account, to interconnect each customer, (g) the length of conductor anticipated from the point of interconnection with existing facilities to the customer location, (h) description of any upgrades necessary to existing facilities including estimated costs by FERC account, (i) whether any additional facilities not included in response to parts (d) and (e) are anticipated, and if so, a description and estimate of the costs of those facilities, (j) the current status of each customer in terms of finalization of interconnection and timing of interconnection, (k) the nature of the energy use anticipated, i.e. computer server, type of manufacturing, etc., (l) any indicia of the level of direct permanent employee positions expected to be hired by that customer at that location. Please also describe the general industry of each customer.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Date.)

Prepared By: Rob Dixon

Title: Senior Director – Economic, Community, and Business Development

Date: 6/1/2025

HIGHLY CONFIDENTIAL
20 CSR 4240-2.135(2)(A)1 and Motion for Protective Order
(Attachment Only)

The attached spreadsheet provides a list of all customers or potential customers that the Company is aware of that are seeking in excess of 25 MW of expected demand load. Broadly, we classify these as "economic development projects." Note that this list excludes the long-established Ameren Missouri customers who may currently exceed 25

MW of peak demand, but who are not seeking significant expansions at this time and would therefore not have information that is responsive to this Data Request.

The attached spreadsheet classifies these economic development projects into three categories: construction agreements, large load interconnect queue, and additional economic development projects above 25 MW. The following provides additional context on this categorization:

- **Construction Agreements:** These 5 projects represent the nearly 2.3 gigawatts of economic development projects that have requested and received transmission system interconnection studies and have executed construction agreements and made initial payments for these projects. Projects in this category have initial engineering and design plans, construction plans and timelines, cost estimates, and expected in-service dates. These construction agreements may be executed by the Company and with either a developer or the expected end-use customer. Developers are preparing the real estate and entering into separate agreements with end-use customers who will eventually operate at the site. The Company is generally not privy to the nature of those separate agreements between developers and the end-use customers. It is likely that some of the engineering designs and final costs will change in the coming months, as end-use customers and developers refine their site plans. Construction agreements would be amended to accommodate any such changes. The Company intends to execute Electric Service Agreements with the end-use customer at these sites, pending the approval of this docket.
- **Large Load Interconnection Queue:** These projects have formally requested a transmission system interconnection study at a specific location but have not yet received the results of such study. These projects represent a combination of potential end-use customers, developers, those conducting multi-state site searches, and other speculative inquiries. Upon the completion of the interconnection study, the Company will issue a report that details, among other things, the expected costs and timelines to interconnect the load to the transmission system. Should those projects wish to proceed after receiving their interconnection study, the Company would execute construction agreements with them to govern the process for building the infrastructure and the customers' required payments.
- **Additional Economic Development Projects above 25 MW:** These projects represent other inquiries to Ameren Missouri, which have not yet made formal requests for transmission system studies. These projects represent a combination of potential end-use customers, developers, those conducting multi-state site searches as the initial phases of a multi-state site selection process being conducted by the State of Missouri's economic development agencies, and other speculative inquiries. As noted in the spreadsheet, there are several projects listed as "duplicative." In many cases, this is because entities are evaluating multiple sites for a potential project or because both developers and end-users are initiating

projects. In situations like this, it is common for entities to "cast a wide net" as they initiate their site search until they make a final site decision at one location. In other cases, end-users and developers end up partnering together on a project, in which case the "duplicative" request would drop off the list and combine with another project.

Other notes on the attached spreadsheet:

- **Data Request subpart (d), column E:** The Company assumed this question is asking about the scope of the Ameren Missouri Built Facilities within the substation in order to connect the lines to the customer
- **Data Request subpart (e), column F:** The Company assumed this question is asking about radial Ameren Missouri lines to customer.
- **Data Request subpart (f), column G:** The Company assumed this question is asking about the reimbursable costs of the Ameren Missouri Built Facilities for the customer.
- **Data Request subpart (g), column H:** The Company assumed this question is asking about Ameren Missouri Network equipment. This equipment can include network facilities that will be built for the project.
- **Data Request subpart (h), column I:** The Company assumed this question is asking about network upgrades Ameren Missouri will be making because of the project.
- **Data Request subpart (i), column M:** Information about the eventual number of permanent jobs can only be provided by the end-use customer who ultimately operates there. Thus, if a developer is leading the interaction with Ameren Missouri to establish electric service rather than an end-use customer, the number of permanent employees may not yet be known until determined by the end-use customer. In other cases, estimated employment numbers are provided by the State of Missouri's or regional economic development organizations when initiating a site search.

Ameren Missouri
Case Name: ET-2025-0184
Docket No(s): Large Load Tariff - Customers

Response to Discovery Request: MPSC-MPSC 0008
Date of Response: 6/16/2025
Witness: N/A

Question: Will Ameren study large load customers as a separate customer class from the Large Power Service class in future rate cases? If not, why not? Will Ameren Missouri oppose CCoS studies submitted by other parties on the basis of separating large load customers from the legacy Large Power Service class in future rate cases?

Response:

Prepared By: Tom Hickman
Title: Regulatory Rate Consultant
Date: 5/22/25

The Company does not currently expect to study large load customers as a separate customer class from the Large Power Service class in future rate cases. This aligns in consistency with our proposed tariff filings and the fact that these customers would be treated as a part of the Large Power Service class. The Company cannot determine whether it will support or oppose any future CCoS studies on any basis until those studies are completed. The Company will continue to evaluate and reevaluate decisions related to studies supporting CCoS in future rate cases on an ongoing basis.