

SCHEDULE CB-3

Data Response Display - ET-2025-0184 - 0063.0

Request Summary ▼

Submission No.

ET-2025-0184

Request No.

0063.0

Requested Date

10/14/2025

Due Date

10/28/2025

Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Information Considered in Developing LLCS Tariff Plan

Description

A. Did Staff consult with any large load customer as part of the development of its proposed LLCS tariff plan? If so, please identify those customers and describe the input provided by them. B. Did Staff consult with any utility in Missouri or the U.S., regarding its proposed LLCS tariff plan? If so, please identify those utilities and describe the input provided by them. C. Did Staff evaluate large load tariffs implemented in other jurisdictions to inform its proposed LLCS tariff plan? If so, please identify all tariffs that Staff evaluated. D. To Staff's knowledge, are there any other large load tariffs in the U.S. that are similar to Staff's proposal? If so, please identify those tariffs and describe the similarities and differences.

Request Security

Public (DR)

Response Date

10/28/2025

Response

1. Staff objected to this DR. Without waiving the objection, Staff states that it did not directly solicit input from large load customers in developing its recommendation. 2. Staff objected to this DR. Without waiving the objection, Staff states that it did not directly solicit input from any utility prior to the filing of its recommendation in this case. 3. Staff has generally kept abreast of issues, plans, and tariffs in various states including Ohio and Indiana, as described in the Supplemental Rebuttal Testimony of J Luebbert. 4. Staff has not conducted a detailed comparison to identify specific similarities with any given tariff. Staff notes that its basic elements of a customer charge, a facilities charge, energy charges, and demand charges with mechanisms to enforce minimum revenue from demand charges are essentially ubiquitous. Staff's recommendation is different from those in other states in that it is designed to specifically address Missouri law including the Renewable Energy Standard, the Missouri Fuel Adjustment Clause, and revenue treatment of economic development discount riders applied to other customers. Staff's recommendation is also different in that it attempts to transparently bill customers for each element of the functionalized cost of service associated with that element, and to separately apply a factor to achieve a contribution towards recovery of what is often termed "fixed" cost of service elements such as executive compensation, office buildings, computer systems, general plant and expense items, and other cost of service elements that are not directly attributable to capacity, energy, or transmission.

Objections

Rationale

Attachments ▼

No Attachments Found

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Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Commercial Pricing Nodes

Description

In reference to Staff Recommendation, p. 23, lines 19-20, "Staff recommends that the Commission require that each LLCS customer be registered with MISO as a separate commercial pricing node." A. Did Staff conduct any analysis of price volatility that could be introduced by creating separate commercial pricing nodes for LLCS customers? If so, please provide all analyses. If not, why not? B. Does Staff agree that nodal prices can fluctuate significantly and unpredictably due to changes in local supply and demand? If not, please explain. C. Has Staff estimated the costs associated with creating separate commercial pricing nodes for LLCS customers including infrastructure, software, staffing, and implementation costs? If so, please provide these estimates and all supporting workpapers. If not, why not? D. Has Staff examined the actual impact of separate commercial pricing nodes for LLCS customers on transmission congestion? If so, please provide these estimates and all supporting workpapers. If not, why not? E. Is Staff aware of any large load customer that exists within a separate commercial pricing node anywhere in the U.S.? If so, please identify these customers and explain the context in which the separate pricing node was created.

Request Security

Public (DR)

Response Date

10/28/2025

Response

Staff objected to this DR. Without waiving the objection, Staff states: A. Staff did not conduct quantification of price volatility. Staff does not have information necessary to quantify or conduct such analysis. B. Yes. C. No. However, Staff assumed that the incremental costs associated with the proposal would generally be limited to staffing, if Ameren Missouri is unable to utilize existing personnel. D. No. To the extent that transmission congestion issues exist for LLCS customers, a separate commercial pricing node should not increase that potential. Rather, a separate commercial pricing node would insulate non-LLCS customers from bearing the costs of congestion issues that result from LLCS customer operations. E. No. Staff does not have access to information for individual customers throughout the United States. Staff is unaware of any customer that currently takes service from Ameren Missouri that would qualify as an LLCS customer.

Objections

Response Security

Public (DR)

Attachments ▼

No Attachments Found

Data Response Display - ET-2025-0184 - 0067.0

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ET-2025-0184

Request No.

0067.0

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10/14/2025

Due Date

10/28/2025

Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Integrated Energy Market Issues

Description

In reference to Staff's Recommendation, p. 23 line 25 through p. line 1, "Generally Ameren Missouri proposed tariffs fail to recognize the determinants associated with each of these discrete integrated market expenses for LSEs." A. Does Ameren Missouri's current LPS tariff recognize the determinants associated with each discrete integrated market expense for LSEs? B. Please explain how each discrete MISO integrated market expense is currently allocated to each customer class under Ameren's current tariffs. C. Please identify the total amount of integrated market expenses for Ameren Missouri as shown in Staff's workpapers. Please identify the workpapers and the location within each workpaper where these total expenses can be found. If these amounts are not in Staff's workpapers, please provide the most recent amounts available. D. Please identify the allocation to each customer class for Ameren Missouri of the total amount of integrated market expenses for LSEs as shown in Staff's workpapers. Please identify the workpapers and the locations within each workpaper where these allocated expenses can be found. If these amounts are not in Staff's workpapers, please provide the most recent amounts available.

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Response

The current method of flowing expenses through the FAC is not sufficient to address the scale of fluctuations in energy sales that will be needed to serve large load customers. The Commission has previously recognized the need to incorporate mechanism into the FAC, such as the "N Factor," in recognition that the existing FAC did not result in reasonable impacts. Mismatches in cost allocation methodologies utilized by parties in future rate cases along with the manner in which costs and revenues flow through the FAC may exacerbate these issue of including LLCS customer load in the existing FAC. The Commission has authorized the current FAC treatments as contained in the active FAC tariffs for Ameren Missouri. The concerns Staff raises with regard to LLCS customers is that the scale of LLCS customers will differ significantly from current customers such that differing treatment is appropriate.

Objections

Response Security

Public (DR)

Attachments ▼

No Attachments Found

Data Response Display - ET-2025-0184 - 0068.0

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Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Integrated Energy Market Issues

Description

In reference to Staff Recommendation, p.23, lines 23-25, "Staff's recommended LLCS tariff sets out each area as a discrete charge in its recommended rate structure." A. Please explain why the current cost allocation methodology used for LPS customers is not reasonable for the allocations of these costs. B. Please provide an estimate of the change in costs that would occur under Staff's proposal if applied to LPS customers.

Request Security

Public (DR)

Response Date

10/28/2025

Response

Staff objected to this DR. Without waiving the objection, Staff states: A. The quoted sentence is not directly related to cost allocation methodology. The quoted sentence is discussing the components included in Staff's rate structure. Staff's recommendation is to create charges to recover the functionalized cost of service associated with a customer charge, facilities charge, capacity, transmission, and energy, and it is designed to specifically address Missouri law including the Renewable Energy Standard, the Missouri Fuel Adjustment Clause, and revenue treatment of economic development discount riders applied to other customers. Staffs recommendation attempts to transparently bill customers for each element of the functionalized cost of service associated with that element, and to separately apply a factor to achieve a contribution towards recovery of what is often termed "fixed" cost of service elements such as executive compensation, office buildings, computer systems, general plant and expense items, and other cost of service elements that are not directly attributable to capacity, energy, or transmission. B. On October 17, 2025, counsel for Google clarified by email that "Same as 67C. Clarification as follows, "68 A. Please explain why the current cost allocation methodology used for LPS customers is not reasonable for the allocations of these costs to LLCS customers. B. Please provide an estimate of the change in costs to LLCS customers that would occur under Staff's proposal if applied to LPS customers to "set out each area as a discrete charge." Staff has not performed such an analysis, and it is not clear how such an analysis could be performed as Staff has not designed a rate structure in this case applicable to LPS customers

Objections

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Attachments ▼

No Attachments Found

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Lexi Klaus (lexi.klaus@psc.mo.gov)

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Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Charges for Contributions to Fixed Cost Recovery

Description

In reference to Staff Recommendation, p. 58, lines 30-34, "The charges discussed above do not reflect Ameren Missouri's day-to-day costs of doing business, such as computer systems, computer software, office buildings, office furniture, management employees, investor relations costs and expenses, other overheads, and the revenue requirement associated with policy-driven activities, such as solar rebates, electric vehicle charging stations, and supports for low-income rate payers." A. Please identify the location in Staff's workpapers of the costs identified above, including the name of each workpaper and the location within each workpaper, with specific cell references. B. Has Staff done any analysis to estimate the change in the above identified costs associated with the addition of LLCS load"? If so, please provide all analyses.

Request Security

Public (DR)

Response Date

10/28/2025

Response

Staff objected to this DR. Without waiving the objection, Staff states: A. Please refer to workpaper "Ameren LLCS other rates." At tab "income statement" the expense associated with these items are set out in rows 191 – 237, and portions of rows 239 – 320. On tab "RB adjust," rate base amounts associated with these items are set out from row 4 – 35," except with amounts indicated in F or G as being fuctionalized to demand or transmission. On tab "Plant Sheet" net plant and depreciation expense amounts are set out in rows 5, 7, and 162 – 179. B. Staff is optimistic that the cost of service that is not directly associated with production, transmission, integrated market interactions, or obtaining energy for LLCS customers will not change with the addition of LLCS load. Staff has not performed any specific analysis.

Objections

Response Security

Public (DR)

Rationale

No Attachments Found

Data Response Display - ET-2025-0184 - 0070.0

Request Summary ▼

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ET-2025-0184

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Due Date

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Issue

Tariff Issue

Other

Requested From

MO PSC Staff (Other)

Lexi Klaus (lexi.klaus@psc.mo.gov)

Requested By

Google LLC (Other)

Sean M. Pluta (spluta@polsinelli.com)

Brief Description

Charges for Contributions to Fixed Cost Recovery

Description

In reference to Staff Recommendation, p. 59, lines 1-6, "Staff's recommended structure includes two charges so that the LLCs rate will be set to essentially the floor for economic development discount recipients established by Section 393.1640 RSMo., and so that, with appropriate accounting treatments, these rate schedules will reasonably ensure LLCs customers rates will reflect the customers' representative share of the costs incurred to serve the customers and prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from service to LLCs customers." A. Is Staff proposing an incremental cost approach for LLCs customers such as that described in Section 393.1640 RSMo? Please explain. B. If Staff is not proposing an incremental cost tariff for LLCs customers, please explain why it is appropriate to set a floor on the rate for LLCs customers based on the floor for economic development discount recipients. C. Could Staff's recommended structure result in the rate schedules that recover more than an LLCs customer's representative share of costs incurred to serve the customers? D. How will Staff ensure that its recommended structure will not result in rate schedules that recover more than an LLCs customer's representative share of costs incurred to serve the customer?

Request Security

Public (DR)

Response Date

10/28/2025

Response

Staff objected to this DR. Without waiving the objection, Staff states: A. Staff does not agree that Section 393.1640 constitutes an "incremental cost approach," and Staff is not proposing an incremental cost rate in that the rate recommended by Staff reflects historic plant investment in utility assets which are lower in original cost than will be the original cost of new assets, however, Staff is using Section 393.1640 as guidance as to a minimal level of fixed cost of service contribution from a new customer. B. Staff is not proposing an incremental cost rate in that the rate recommended by Staff reflects historic plant investment in utility assets which are lower in original cost than will be the original cost of new assets. C. No, because the intent of Staff's rate structure is to establish that 20% of the functionalized capacity, transmission, energy, Renewable Energy Standard, and EDR discount recovery costs of service for serving an LLCs customer be deemed to be the representative share of the remaining cost of service that is reasonable to recover from the LLCs customer to achieve a contribution towards recovery of what is often termed "fixed" cost of service elements such as executive compensation, office buildings, computer systems, general plant and expense items, and other cost of service elements that are not directly attributable to capacity, energy, or transmission. D. Staff's rate structure establishes that 20% of the functionalized capacity, transmission, energy, Renewable

Energy Standard, and EDR discount recovery costs of service for serving an LLCS customer be deemed to be the representative share of the remaining cost of service that is reasonable to recover from the LLCS customer to achieve a contribution towards recovery of what is often termed "fixed" cost of service elements such as executive compensation, office buildings, computer systems, general plant and expense items, and other cost of service elements that are not directly attributable to capacity, energy, or transmission.

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Objections

Response Security

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Rationale

Attachments ▼

No Attachments Found