

Exhibit No.:  
Issues: Large Load Rate Plan  
Witness: Maurice Brubaker  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Missouri Industrial Energy Consumers  
Case No.: ET-2025-0184  
Date Testimony Prepared: November 3, 2025

**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 New Modified Tariffs for  
Service to Large Load Customers

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**Case No. ET-2025-0184**

Surrebuttal Testimony and Schedules of

**Maurice Brubaker**

On behalf of

**Missouri Industrial Energy Consumers**

November 3, 2025



Project 11842

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STATE OF MISSOURI

COUNTY OF ST. LOUIS

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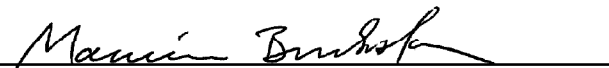
**Affidavit of Maurice Brubaker**

Maurice Brubaker, being first duly sworn, on her oath states:

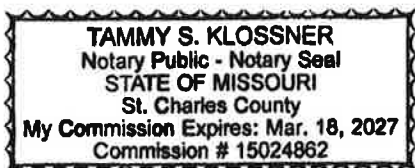
1. My name is Maurice Brubaker. I am a consultant in the field of public utility regulation and associated with the firm of Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes are my Surrebuttal Testimony and Schedules which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2025-0184.

3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

  
Maurice Brubaker

Subscribed and sworn to before me this 3<sup>rd</sup> day of November, 2025.



  
Notary Public

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| In the Matter of the Application of Union<br>Electric Company d/b/a Ameren Missouri<br>for Approval of New Modified Tariffs for<br>Service to Large Load Customers | )<br>)<br>)<br>)<br>)<br>) | Case No. ET-2025-0184 |
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**BRUBAKER & ASSOCIATES, INC.**

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

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**In the Matter of the Application of Union  
Electric Company d/b/a Ameren Missouri  
for Approval of New Modified Tariffs for  
Service to Large Load Customers**

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**Case No. ET-2025-0184**

**Surrebuttal Testimony of Maurice Brubaker**

1    **Q     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A     Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,  
3           Chesterfield, MO 63017.

4    **Q     WHAT IS YOUR OCCUPATION?**

5    A     I am a consultant in the field of public utility regulation and associated with the firm of  
6           Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

7    **Q     ARE YOU THE SAME MAURICE BRUBAKER WHO FILED REBUTTAL  
8           TESTIMONY IN THIS PROCEEDING ON SEPTEMBER 5, 2025?**

9    A     Yes, I am.

10   **Introduction**

11   **Q     ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

12   A     I am appearing on behalf of the Missouri Industrial Energy Consumers ("MIEC"). As  
13           customers of Ameren Missouri ("AMO") they are keenly interested in the potential  
14           benefits that will accrue to the AMO service territory if substantial new customers and

**Maurice Brubaker  
Page 1**

1 business operations become customers in the AMO service territory. At the same time,  
2 the potential growth in the service territory presents some significant challenges in  
3 terms of providing the necessary service as well as increasing concerns about the  
4 potential impact on existing customers that might result from these potential  
5 expansions.

6 Under AMO's proposal for service to large load customers,<sup>1</sup> they will be served  
7 under regular rates (in particular, the Large Primary Service ("LPS") rate) with the  
8 requirement that they take service at the transmission level and with certain other  
9 special provisions designed to address features of the customers expected to  
10 participate in the Large Load Customer ("LLC") Rate Plan. AMO proposes to require  
11 each such customer to execute an Electric Service Agreement ("ESA"), which will  
12 require specific approval by the Commission.

13 In contrast to AMO's logical approach of building off of the existing approved  
14 rate structure, the Staff of the Missouri Public Service Commission ("Staff") completely  
15 disregards the existing rate structure and proposes to use entirely new cost of service  
16 and rate design concepts that it proposes to apply to new customers and load growth  
17 of existing customers, both in excess of approximately 25 MW.

## 18 **Summary of Testimony**

19 **Q COULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?**

20 **A** My recommendation is that Staff's proposed rate be rejected.

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<sup>1</sup>AMO defines these as customers with an electrical load of more than 100,000 kW.

**Q PLEASE ELABORATE.**

**A** The recommendation is based on the following:

1. Staff's proposed rate makes no attempt to work within the existing rate structure and rate policies of AMO to accommodate large new loads.
2. Staff's proposal is overly complex, unnecessarily burdensome and is not cost-based.
3. Staff's rate includes many components that are not found in AMO's current rate structure, or in the rate structure of any other utility of which I am aware.
4. The cost to a customer under Staff's proposed rates would exceed the cost under current Rate 11M by about 70%.
5. Staff's rate design and cost are totally detached from any class cost of service analysis that typically forms guidelines for the development and application of rates.

**Q PUTTING THAT ASIDE FOR THE MOMENT, DO YOU HAVE ANY COMMENT ABOUT STAFF'S PROPOSAL TO APPLY ITS RATE TO CUSTOMERS WITH DEMANDS IN EXCESS OF 25 MW, RATHER THAN AMO'S PROPOSAL TO APPLY ITS RATE TO LOADS IN EXCESS OF 100 MW?**

**A** Yes. As explained in more detail later in my testimony, a 25 MW threshold is inconsistent with general industry practices and should be rejected in favor of AMO's 100 MW proposed threshold. 25 MW is extremely small in relation to AMO's annual peak of about 7,100 MW. A load of this size cannot be considered as "large."

**Q STAFF RECOMMENDS REJECTION OF AMO'S PROPOSED NEW RATES AND RIDERS. WHAT IS YOUR POSITION?**

**A** I believe that each of the proposed rates and riders has value, but requires further definition and explanation.

An important factor that neither AMO nor Staff addresses is how to apportion the renewable attributes among eligible customers requesting to take advantage of

1           these rates and riders. In order to have an equitable program, it is important that the  
2           rates specify the manner of apportioning these attributes. Absent the development and  
3           justification of a different method, I recommend that a pro rata allocation among  
4           applying customers be followed.

5    **Staff's Proposal**

6    **Q     HAVE YOU REVIEWED THE PROPOSALS OF STAFF WITH RESPECT TO**  
7           **SERVING CERTAIN POTENTIAL NEW LOADS?**

8    A     Yes. Staff unfortunately has chosen to propose a totally new approach to class revenue  
9           requirements and the design of rates rather than to work with the current established  
10          rate structure.

11   **Q     HOW WOULD YOU CHARACTERIZE STAFF'S PROPOSAL?**

12   A     Staff's proposal is completely unconnected to any existing cost of service or rate  
13          designs that underlie the current, approved, rates and rate structures of AMO. The  
14          proposed rate is unnecessarily complex, novel, and inappropriate.

15   **Q     ON SCHEDULE 1, PAGE 1, OF STAFF'S RECOMMENDATIONS, WHICH ARE IN**  
16           **APPENDIX 2, STAFF WOULD PRECLUDE CUSTOMERS ON SCHEDULE LLCS**  
17           **FROM SERVICE UNDER OR PARTICIPATION IN 12 SEPARATE PROVISIONS IN**  
18           **THE EXISTING TARIFFS. HAS STAFF EXPLAINED THE BASIS FOR THIS**  
19           **PROPOSED PROHIBITION?**

20   A     Staff was asked this question in discovery and basically provided a non-answer. The  
21          following question and answer are addressed to this issue:

1 "DR47 MIEC-STAFF 1-5.

2 On page 1 of Schedule 1, there are 12 different services listed which  
3 LLCs customers would not be eligible for. For each one of these  
4 exclusions, please explain in detail the basis for the exclusion.

5 Staff Witness: Sarah Lange

6 **Staff Response:**

7 **Each of these services would interfere with recovery of the actual**  
8 **amount to be billed under the recommended tariff."**

9 Basically, Staff simply says these services would interfere with recovery of the  
10 amounts to be billed under Staff's recommend tariff. This leaves a number of questions  
11 unanswered. For example, why shouldn't customers receive credit for  
12 customer-owned substations (Rider B)? Why shouldn't supplementary service and  
13 standby service that would apply if the customer had some self-generation be  
14 available? Why shouldn't they be eligible for demand response or curtailment  
15 programs, and many others?<sup>2</sup>

16 **Q ON PAGE 4 OF SCHEDULE 1, THERE IS A LISTING OF RATE COMPONENTS**  
17 **THAT STAFF WOULD PROPOSE TO APPLY TO LARGE CUSTOMERS. HAVE**  
18 **YOU REVIEWED THIS TABLE OF RATES?**

19 **A** Yes. Some of the rate categories are generally found in other tariffs, such as customer  
20 charge, demand charges, energy charge, etc. However, many of the listed charges  
21 are not ones that are frequently, or ever, encountered in the tariffs of other utilities.  
22 They appear to be newly invented components of a rate concept that Staff seems to  
23 think would be appropriate to charge customers. For example, the "Variable Fixed  
24 Revenue Contribution," the "Stable Fixed Revenue Contribution," the "Demand

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<sup>2</sup>For convenience, the questions MIEC proposed to Staff, and Staff's responses, are attached hereto as Schedule MEB-3. (Schedules MEB-1 and MEB-2 were attached to my rebuttal testimony.)

1 Deviation Charge,” and several “Imbalance Charges” are not charges that we normally  
2 find in the tariffs of other utilities.

3 **Q WAS STAFF ABLE TO PROVIDE EXAMPLES OF OTHER UTILITIES THAT**  
4 **CHARGE RATES WITH THESE KINDS OF COMPONENTS?**

5 **A** I do not know whether they could or not, but in response to a data request they chose  
6 not to do so. For example:

7 “DR47 MIEC-STAFF 1-10.

8 With respect to the charges listed on page 4 of Schedule 1, please  
9 provide all utilities that, to Staff’s knowledge, include one or more of  
10 these charges in their tariff applicable to Large Load Customers. Please  
11 provide copies of the tariffs.

12 Staff Witness: Sarah Lange

13 **Staff Response:**

14 **Staff counsel objected to this data request. To the extent that the**  
15 **DR asks for estimates, analysis, or calculations that have not been**  
16 **performed by Staff, Staff will not provide a response.”**

17 The basis for failure to respond was a statement that, “To the extent that the  
18 DR asks for estimates, analysis, or calculations that have not been performed by Staff,  
19 Staff will not provide a response.” Staff is dodging the issue by posing an objection to  
20 something that was not asked of Staff. The DR simply asks Staff to identify any utilities  
21 that, “...to Staff’s knowledge” apply one or more of these charges, and did not ask for  
22 estimates, analysis or calculations.

23 I think the obvious conclusion is that Staff could not point to the tariffs of any  
24 other utilities that contain these charges.

1    **Q**     **ON PAGE 2 OF STAFF’S SCHEDULE 1 IN APPENDIX 2, THERE IS A LIST OF**  
2           **COMPONENTS OF A SERVICE AGREEMENT. ONE OF THE ITEMS,**  
3           **PARAGRAPH C, CALLS FOR DETAILED INFORMATION ABOUT ANTICIPATED**  
4           **LOAD BY MONTH AND YEAR FOR A MINIMUM OF 15 YEARS. THERE ALSO ARE**  
5           **SIX SUBCATEGORIES OF DETAILED REQUIREMENTS FOR WHAT THE**  
6           **CUSTOMER SHOULD PROVIDE TO THE UTILITY. IN YOUR EXPERIENCE ARE**  
7           **THESE KINDS OF REQUIREMENTS TYPICALLY FOUND IN SERVICE**  
8           **AGREEMENTS?**

9    **A**     In my experience, no.

10   **Q**     **WAS STAFF ABLE TO PROVIDE ANY EXAMPLES OF THE TARIFFS OF OTHER**  
11           **UTILITIES THAT CONTAINED SIMILAR REQUIREMENTS?**

12   **A**     As before, I do not know whether they were able to or not, but they refused to even  
13           answer the question. The answer provided was the same as the one provided and  
14           referenced previously, namely: “To the extent that the DR asks for estimates, analysis,  
15           or calculations that have not been performed by Staff, Staff will not provide a response.”

16               Obviously MIEC’s DR did not ask for any of these items, yet Staff chose not to  
17           respond meaningfully. Again, the obvious conclusion is that Staff does not know of  
18           any.

### 19    **Staff’s Rejection of Proposed New Rates and Riders**

20   **Q**     **HAS AMO PROPOSED SEVERAL NEW RATES AND RIDERS?**

21   **A**     Yes. AMO has proposed several new rates and riders. They are as follows:

- 22           ➤ Rider RSP LLC (Renewable Solutions Program – Large Load Customers), which  
23           is similar to the Company’s existing, Commission-approved Renewable Solutions  
24           Program but with modifications tailored to meet large load customer needs.

- 1           ➤ Rider NEC (Nuclear Energy Credits Program), which is a new program developed  
2           as another means of meeting large load customers' needs for clean energy through  
3           the provision to such customers of the clean energy attributes of nuclear energy  
4           produced by Company-owned nuclear resources.
- 5           ➤ Rider CCAP (Clean Capacity Advancement Program), which is a new program  
6           allowing large load customers to support energy storage systems that enable the  
7           storage of clean Energy.
- 8           ➤ Rider CEC (Clean Energy Choice Program), which is a new program that allows  
9           large load customers to propose and ultimately cover the costs for advancing  
10          supply-side resources that otherwise would not have been pursued by the  
11          Company pursuant to its Preferred Resource Plan.

12   **Q       WHAT IS STAFF'S POSITION WITH RESPECT TO THESE NEW RATES AND**  
13   **RIDERS?**

14   A       On pages 67-85 of rebuttal, Staff expresses conceptual concerns and poses objections  
15           to the formulation of all of these proposed new rates and riders.

16   **Q       HAVE YOU PREVIOUSLY EXPRESSED YOUR OPINION WITH RESPECT TO**  
17   **THESE RATES AND RIDERS?**

18   A       Yes. I did so on pages 4-6 of my rebuttal testimony. Although the programs need  
19           additional explanation, I believe they are valuable. Many large load customers are very  
20           sophisticated energy users, and many have specific corporate objectives with respect  
21           to the nature of their electric service. Specifically, many such customers have clean,  
22           or carbon-free, energy goals that drive their energy procurement activities and which  
23           can influence their decisions regarding where to locate. The kinds of programs  
24           proposed by AMO constitute a meaningful and reasonable path to provide access to  
25           renewable attributes that customers could utilize in their programs.

1 I continue to object to limiting the availability of any of these rates or riders only  
2 to new large load customers. Instead, all interested Rate 11M customers should be  
3 eligible to participate in each of these programs.

4 In order to ensure an equitable application, I also recommend that the method  
5 of apportioning attributes among applicants be clearly spelled out in the tariff. This will  
6 help ensure that all interested customers are treated equitably.

7 In my rebuttal testimony, I suggested that one approach could be the auction  
8 approach that was used in AMO's most recent RSP program. Subsequently, from  
9 discussions with customers and with AMO, I have learned that there were some  
10 difficulties and dissatisfactions with that approach. Consequently, I am recommending  
11 that a different apportionment method be adopted for these new rates and riders, and  
12 in the absence of working out any other mechanism, a "pro rata" approach to apportion  
13 available attributes among customers expressing an interest in them would be a  
14 reasonable approach. Establishing an equitable apportionment method in advance of  
15 execution is critical to program fairness.

16 **Megawatt Threshold for Requirements to**  
17 **Take Service Under Staff's Proposed LLCS Rate**

18 **Q WHAT IS THE MEGAWATT LOAD SIZE THRESHOLD THAT STAFF PROPOSES**  
19 **TO USE TO REQUIRE TAKING SERVICE UNDER THE LLCS RATE?**

20 **A** Staff proposes a threshold of 25 MW.

21 **Q HOW DOES THIS COMPARE TO AMO'S PROPOSAL?**

22 **A** AMO has proposed to make the threshold after which use of the LLCS tariff would be  
23 mandatory at 100 MW.

1    **Q        IN YOUR OPINION, WHICH THRESHOLD IS MORE APPROPRIATE?**

2    A        By far, the 100 MW threshold is more appropriate than Staff's minuscule 25 MW  
3            threshold.

4    **Q        WHY DOES STAFF SAY THAT IT CHOSE 25 MW?**

5    A        This is set forth in Staff's response to DR47 MIEC-STAFF 1-12, and is shown in  
6            Schedule MEB-3.

7    **Q        DO YOU BELIEVE STAFF'S EXPLANATION JUSTIFIES A 25 MW THRESHOLD?**

8    A        No. Staff's justification is largely based on experience with relatively small loads that  
9            have been experienced by AMO and some other utilities; in Staff's view. This just  
10          happens to be the level of load for which there has been recent experience, because  
11          (except for the 500 MW Noranda load) large loads have not been experienced on the  
12          AMO system. Thus, the actual circumstance of load size is coincidental, and does not  
13          justify a load threshold. Also, the fact that a load may be served at transmission really  
14          tells us nothing about the potential impact of the load on the utility's system, as  
15          compared to the impact of other loads. Accordingly, Staff's criteria is not objective and  
16          does not consider factors that make a difference.

17   **Q        ARE THERE ANY INDUSTRY ANALYSES OR SIMILAR REVIEWS OR STUDIES**  
18            **THAT ADDRESS THIS ISSUE?**

19   A        Yes. The North American Electric Reliability Corporation ("NERC") sponsors a Large  
20            Load Task Force. (NERC is the organization that establishes reliability requirements  
21            for electric utilities.)

**Q WHAT HAS THE TASK FORCE RECENTLY SAID ON THIS ISSUE?**

A The September 2025 report of the Large Load Task Force generally discussed the issue and stated the following at page v:

“Emerging large loads, such as data centers, crypto-mining facilities and industrial hydrogen production, are introducing numerous challenges to the reliability, resilience and security of the North American BPS.<sup>3</sup> These facilities, which are rapidly increasing in number, scale and operational complexity, strain existing NERC reliability standards, interconnection practices, and system planning assumptions that were not designed to account for their unique characteristics.”

Obviously, the concern is brought about by large loads that are materially different from loads that utilities generally have been serving. Loads of this nature will be substantially larger than 25 MW.

**Q WHAT ELSE HAS NERC RECENTLY SAID ABOUT THIS ISSUE?**

A The June 2025 report entitled “Characteristics and Risks of Emerging Large Loads” discussed the size issue and reported on the results of surveys of its membership. Recognizing that a number of factors come into play, the task force reported:

“In November 2024, a subgroup of the NERC LLTF conducted an informal survey to gather feedback from participants on what load size should qualify as “large” under a potential NERC regulatory construct. Most of the survey respondents qualified “large” as greater than 50 MW, and the single size number most commonly suggested was 75 MW.”

This is a credible opinion by those responsible for the operation of the electric system, as contrasted to an opinion by those who have no such responsibility.

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<sup>3</sup>Bulk Power System.

1   **Q     ARE YOU GENERALLY FAMILIAR WITH THE TARIFFS OF OTHER ELECTRIC**  
2           **UTILITIES WHO ARE EXPERIENCING SUBSTANTIAL INTEREST FROM DATA**  
3           **CENTERS AND OTHER LARGE LOADS?**

4   **A**Yes. Schedule MEB-4 is a summary of large load tariff provisions<sup>4</sup> for areas that I am  
5           familiar with that have significant activity concerning the addition of large loads. The  
6           AMO tariff proposal is at the top for reference. The tariffs following generally are listed  
7           in descending size of threshold requirements. Most generally, the size is 100 MW or  
8           larger for service under the large load tariff. These are generally consistent with AMO's  
9           proposal, and Staff's 25 MW threshold proposal is out of range and should not be  
10          adopted.

11   **Q     I NOTE THAT THE LAST UTILITY ON THE TABLE IS OHIO POWER WITH A**  
12           **THRESHOLD OF 25 MW. HOW DOES OHIO POWER COMPARE TO AMO IN**  
13           **TERMS OF PEAK LOAD?**

14   **A**Ohio Power is significantly smaller. According to information provided in its most recent  
15          FERC Form 1 Report, Ohio Power's maximum demand was 2,252 MW.

16   **Q     HOW DOES THIS COMPARE TO THE SIZE OF THE AMO SYSTEM?**

17   **A**Accordingly to AMO's most recent FERC Form 1 Report, its annual peak load was  
18          7,199 MW, or more than three times the size of Ohio Power's load. So, it is not  
19          surprising that we would see Ohio Power with a much lower threshold than would be  
20          suitable for AMO.

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<sup>4</sup>These tariffs are publicly available on the utility or commission websites.

1    **Q     WHAT DO YOU CONCLUDE FROM THIS REVIEW OF LARGE LOAD TARIFFS**  
2    **OFFERED BY OTHER UTILITIES?**

3    A     I conclude that AMO's 100 MW threshold for application of large load terms is generally  
4           consistent with industry practice and should be adopted while Staff's 25 MW proposal  
5           is not, and is not otherwise supported, and should be rejected in favor of AMO's  
6           proposal for a 100 MW threshold.

7    **Q     ON OCTOBER 23, 2025, THE SECRETARY OF ENERGY ISSUED A DIRECTIVE TO**  
8    **THE FEDERAL ENERGY REGULATORY COMMISSION ("FERC") TO INITIATE A**  
9    **RULEMAKING PROCEDURE AND PROPOSAL REGARDING THE**  
10   **INTERCONNECTION OF LARGE LOADS PURSUANT TO THE SECRETARY'S**  
11   **AUTHORITY UNDER SECTION 403 OF THE DEPARTMENT OF ENERGY**  
12   **ORGANIZATION ACT. ARE YOU FAMILIAR WITH THAT?**

13   A     Yes.

14   **Q     DOES THAT HAVE ANY BEARING ON THE APPROPRIATE SIZE THRESHOLD**  
15   **FOR PURPOSES OF THIS PROCEEDING?**

16   A     No. This directive concerns only transmission issues, namely the interconnection of  
17           new loads to the interstate transmission system. The directive (Advanced Notice of  
18           Proposed Rulemaking – or "ANOPR") is labeled "ensuring the timely and orderly  
19           interconnection of large loads." This clearly is directed to transmission issues only, and  
20           the ANOPR at page 3 is clear in that "...the Commission shall not have jurisdiction,  
21           except as otherwise provided in the statute, over the facilities used for the generation  
22           of electric energy or over facilities used in local distribution or only for transmission of

1 electric energy in intrastate commerce, or over facilities for the transmission of electric  
2 energy consumed wholly by the transmitter.”

3 It is also clear the impetus for this ANOPR is the large number of loads seeking  
4 interconnection with the transmission system and the fact that there are substantial  
5 bottlenecks and long queues interfering with the ability to interconnect these facilities,  
6 and hence to be able to achieve the benefits of the operation of the facilities seeking  
7 interconnection.

8 It is also important to note that any new rules or regulations would only emerge  
9 after the usual proposed rule promulgation by FERC, and the comment period for  
10 FERC ANOPRs and a final FERC decision.

#### 11 **Rate Impact of Staff's Proposal**

12 **Q HAVE YOU COMPARED THE RATES PROPOSED BY STAFF TO EXISTING**  
13 **RATE 11M THAT AMO PROPOSES TO USE FOR INITIAL PRICING OF LARGE**  
14 **LOADS?**

15 A Yes. This is illustrated on Schedule MEB-5. This schedule compares the cost to  
16 customers under the rate that Staff proposes, to Rate 11M (AMO's proposal). Page 1  
17 shows the impact on a 25 MW, 70% load factor customer, and page 2 shows the impact  
18 on a 100 MW, 90% load factor customer.

19 **Q WHAT DO THESE CALCULATIONS SHOW?**

20 A In both instances, Staff's rates would cost a customer about 70% more than would  
21 AMO's Rate 11M.

1    **Q     IN YOUR OPINION, DOES STAFF'S RATE PROPOSAL MEANINGFULLY AND**  
2           **CONSTRUCTIVELY ADDRESS ACCOMMODATION OF LARGE NEW LOADS**  
3           **WHILE CONSIDERING THE POTENTIAL IMPACT ON EXISTING CUSTOMERS?**

4    **A     No. Staff's proposal is overly complex, unnecessarily burdensome and expensive.**

5               **A rate like Staff's proposal would undoubtedly put AMO at the bottom of**  
6           **the list of desirable locations for large new loads.**

7               **IT SHOULD BE REJECTED.**

8    **Q     DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

9    **A     Yes, it does.**

550059

**Ameren Missouri**  
**Case No. ET-2025-0184**  
**Missouri Industrial Energy Consumer's First Set of**  
**Data Requests to the Staff of the Missouri Public Service Commission**  
**Item No. Description**  
September 12, 2025

DR47 MIEC-STAFF 1-1.

Please provide all workpapers supporting all aspects of Staff's filing. Where available, please provide executable versions in native format with all formulas and links intact.

Staff Witness: Sarah Lange

**Staff Response:**

**Workpapers associated with Staff's Recommendation / Rebuttal Testimony were uploaded into the EFIS system under Case No. ET-2025-0184. Parties received an email notification on September 9, 2025, regarding the uploaded workpapers.**

DR47 MIEC-STAFF 1-2.

In reviewing Staff's filing, it is noted in several places that tariff sheet language sometimes includes "25 kW." Should references to "25 kW" have been 25 MW, or was 25 kW intended? If intended, please explain in detail the basis for it and how it would be applied.

Staff Witness: Sarah Lange

**Staff Response:**

**The reference to 25 kW in the "Applicability" section should be "25 MW." Staff does not find any other instances of "25 kW" in the recommended tariff. Staff appreciates MIEC bringing this error to its attention.**

DR47 MIEC-STAFF 1-3.

On page 2 of "Staff Recommendation/Rebuttal," it is stated the Noranda maximum demand was 95 MW. With regard to that statement:

- a. Please state the basis for that belief and provide any supporting material.
- b. Does Staff deny that when all three potlines were operating, the Noranda electrical demand was in excess of 400 MW?
- c. Will Staff accept subject to check that the Noranda maximum demand was in excess of 400 MW?

Staff Witness: Sarah Lange

**Staff Response:**

**This statement was an error and Staff apologizes for any resulting confusion. CONFIDENTIAL** \*\*\*\*\*

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DR47 MIEC-STAFF 1-4.

In Staff's proposed tariff, please describe in detail what would constitute the monthly kW of billing demand. Please state whether it is based on the actual created demand for the month, contract demand, or a minimum billing demand (and, if so, what is the basis for the minimum billing demand), or other parameters.

Staff Witness: Sarah Lange

**Staff Response:**

**Billing demand is four times the sum of the energy consumed in three consecutive five minute intervals in which the most energy is consumed during the applicable periods - winter months between 6:00 AM and 11:00 AM and between 5:00 PM and 9:00 PM.**

DR47 MIEC-STAFF 1-5.

On page 1 of Schedule 1, there are 12 different services listed which LLCS customers would not be eligible for. For each one of these exclusions, please explain in detail the basis for the exclusion.

Staff Witness: Sarah Lange

**Staff Response:**

**Each of these services would interfere with recovery of the actual amount to be billed under the recommended tariff.**

DR47 MIEC-STAFF 1-6.

On page 2 of Schedule 1, which lists components of a "Service Agreement," please list all utilities of which Staff is aware that would require forecasts and descriptions of load that are required according to item "C". Please provide copies of tariffs, contract forms, etc. of other utilities, where applicable.

Staff Witness: Sarah Lange

**Staff Response:**

**Staff counsel objected to this data request. To the extent that the DR asks for estimates, analysis, or calculations that have not been performed by Staff, Staff will not provide a response.**

DR47 MIEC-STAFF 1-7.

If not provided elsewhere, please provide, for each item listed on page 4 of Schedule 1, the detailed workpapers with a narrative explanation of the derivation and the actual calculation supporting the rates, in native format with all formulas and links intact.

Staff Witness: Sarah Lange

**Staff Response:**

**Workpapers associated with Staff's Recommendation / Rebuttal Testimony were uploaded into the EFIS system under Case No. ET-2025-0184. Parties received an email notification on September 9, 2025, regarding the uploaded workpapers.**

DR47 MIEC-STAFF 1-8.

On page 4 of Schedule 1, the rates for several items are marked "TBD". Please provide a narrative explanation of how each of these charges is proposed to be developed.

Staff Witness: J Luebbert

**Staff Response:**

**As stated on page 60 of Staff's recommendation in this case:**

- 1. An Imbalance Charge, if applicable, for the difference between the current-year updated contract demand and the actual demand charge, to account for imbalances in projected demand and actual demand.**
  - a. Ameren Missouri will file a tariff to update these charges based on the current year MISO Planning Resources Auction price for the specified season. This charge will be applied to the difference between the projected demand for each month and the actual demand realized during the demand window for that month at a rate of the lesser of \$11.3475/kW or the current year MISO Planning Resource Auction price for the specified season.**

DR47 MIEC-STAFF 1-9.

With respect to page 4 of Schedule 1, please provide a narrative description and the derivation, of the “Variable Fixed Revenue Contribution,” “Stable Fixed Revenue Contribution,” “RES Compliance Charge,” “EDI Responsibility Charge,” “Capacity Shortfall Rate,” and the “Capacity Cost Sufficiency Rider.”

Staff Witness: Sarah Lange

**Staff Response:**

**The monthly amounts billed under the “Variable Fixed Revenue Contribution,” and “Stable Fixed Revenue Contribution,” are determined by applying the indicated percentages to the indicated billed subtotals. The “RES Compliance Charge,” and “EDI Responsibility Charge,” are determined by applying the indicated rate to the monthly kWh usage. The “Capacity Shortfall Rate,” would be billed on actual monthly billing demand if the rate is triggered and promulgated. The “Capacity Cost Sufficiency Rider,” would be applicable as a lump-sum per month billed to a customer based on the customer’s contract demand if the rate is promulgated in a separate filing.**

DR47 MIEC-STAFF 1-10.

With respect to the charges listed on page 4 of Schedule 1, please provide all utilities that, to Staff’s knowledge, include one or more of these charges in their tariff applicable to Large Load Customers. Please provide copies of the tariffs.

Staff Witness: Sarah Lange

**Staff Response:**

**Staff counsel objected to this data request. To the extent that the DR asks for estimates, analysis, or calculations that have not been performed by Staff, Staff will not provide a response.**

DR47 MIEC-STAFF 1-11.

With respect to the “early termination” provisions on page 5 of Schedule 1, please provide all utilities that, to Staff’s knowledge, impose the same or similar kind of requirements. Please provide tariffs or other documentation.

Staff Witness: Sarah Lange

**Staff Response:**

**Staff counsel objected to this data request. To the extent that the DR asks for estimates, analysis, or calculations that have not been performed by Staff, Staff will not provide a response.**

DR47 MIEC-STAFF 1-12.

Please provide all bases and reasons for Staff's proposal to apply the LLCs Schedule to customers with a demand in excess of 25 MW, rather than 100 MW as proposed by Ameren, or some other value.

Staff Witness: Sarah Lange

**Staff Response:**

**This amount is consistent with a level at which transmission facilities are typically required, this amount is consistent with a level at which special rate treatments or tariff have been sought by all Missouri utilities in the past, and this amount is large enough that imposing it in conjunction with reasonable grandfathering provisions as recommended by Staff would not adversely impact existing customers.**

DR47 MIEC-STAFF 1-13.

In the Evergy Kansas Large Load Docket No. 25-EKME-315-TAR, Evergy, KCC Staff, and all other participants, are signatories to a proposed "Unanimous Comprehensive Settlement Agreement" stipulation that applies the large load tariff only to customers with a demand of 75 MW or greater. Is there any reason why the same threshold demand for tariff eligibility should not apply to Ameren as well? If there are reasons justifying a difference, please justify them in detail.

Staff Witness: Sarah Lange

**Staff Response:**

**Staff counsel objected to this data request in part due to the request's call for speculation. Staff states it was neither a party to the "Unanimous Comprehensive Settlement Agreement" stipulation, nor aware of or involved with the substance of the Kansas negotiations.**

## Large Load Tariff Provisions For Areas With Significant Activity

### Ameren Missouri: Large Load Tariff

| Load Size                                      | Minimum Demand         | Applicability                                                                                                                                                                                                                                                                                | Optional/Mandatory | Implementation                                                                                                                                                                                                              | Contract Length                                                                                         | Status                          |
|------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------|
| Demand ≥ 100 MW<br>Service Voltage(s) > 115 kV | 70% of Contract Demand | The Large Load Tariff was created because of <b>data centers</b> and <b>industrial advanced manufacturing</b> . The tariff is not restricted to only <b>data center customers</b> . New Loads whether aggregated, existing or creating a new load, the Company may exercise it's discretion. | Mandatory          | The Large Load Tariff will be a <b>subclass</b> of the existing LPS Tariff (Large Primary Service). New Tariff is mandatory any customer with actual or projected usage at, or above 100 MW will be subject to this tariff. | Term of Service Minimum: 15 Years<br>Maximum Ramp Period: 5 Years<br>Minimum Full Load Period: 12 Years | This tariff is <b>Pending</b> . |

### Kentucky Power - I.G.S. (Industrial General Service)

| Load Size       | Minimum Demand                                                                                                                                              | Applicability                                 | Optional/Mandatory | Implementation                                                                                                    | Contract Length                   | Status                                       |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|--------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------|
| Demand ≥ 150 MW | <b>Min Demand</b> ≥ 90% of the greater of:<br>a) On peak contract capacity<br>b) Highest Demand of the last 11 months<br>c) Max demand of the billing month | This tariff is not exclusive to data centers. | Mandatory          | This tariff will apply to all new and existing loads as well as incremental loads that will be at minimum 150 MW. | Term of Service Minimum: 20 Years | Approved;<br>Applicable after March 18, 2025 |

### Appalachian Power/Wheeling Power: Schedule LCP/Rate IP

| Load Size                                                     | Minimum Demand                                                          | Applicability                                                                                                                                                                                                     | Optional/Mandatory | Implementation                                                                                                                                                     | Contract Length                                               | Status                      |
|---------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------|
| Individual Location: ≥ 100 MW<br>Multiple Locations: ≥ 150 MW | 80% of Contract Capacity or<br>80% of previous 11 months highest demand | Tariff is applicable to all parties whose contract capacity is expected to grow above 100 MW at an individual plant or above 150 MW at aggregated premises. This tariff is <b>not</b> restricted to Data Centers. | Mandatory          | Schedule LCP and Rate IP apply to new customers and new loads after the date of January 1, 2025. Existing customers are exempt provided they do not add new loads. | Term of Service Minimum: 12 Years<br>Max Ramp Period: 5 years | This tariff is implemented. |

### Indiana Michigan Power: Industrial Power Tariff (Tariff I.P.)

| Load Size                                                    | Minimum Demand                                                          | Applicability                                                                                                                                              | Optional/Mandatory | Implementation                                                                                                                                                    | Contract Length                                               | Status                                           |
|--------------------------------------------------------------|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|--------------------------------------------------|
| Individual Location: ≥ 70 MW<br>Multiple Locations: ≥ 150 MW | 80% of Contract Capacity or<br>80% of previous 11 months highest demand | Tariff is applicable to all parties whose contract capacity is expected to grow above 70 MW at an individual plant or above 150 MW at aggregated premises. | Mandatory          | This tariff is a special provision of the existing <b>Industrial Power</b> tariff. Tariff applies to new loads or expansions of existing loads after Jan 1, 2024. | Term of Service Minimum: 12 Years<br>Max Ramp Period: 5 years | This tariff is <b>Approved and Implemented</b> . |

### Consumer's Energy Company (Michigan) - Rate GPD Update: Large General Service Primary Demand Rate

| Load Size       | Minimum Demand                                                      | Applicability                                                                                                                                                                                              | Optional/Mandatory | Implementation                                                                                                                                                        | Contract Length                                                   | Status   |
|-----------------|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|----------|
| Demand ≥ 100 MW | 80% of Contract Capacity; applied to Max Demand and On Peak Demand. | The existing rate class, Rate GPD, has been amended to include provisions for data centers. New loads are subject to approval by the utility and invokes an adjustment to contract capacity upon approval. | Mandatory          | If increase in customer's usage occurs (more than 1,000 kW of contract Capacity), the Company can adjust the customer's Contract Capacity and Minimum Billing Demand. | Minimum Contract Period: 15 Years<br>Maximum Ramp Period: 5 Years | Proposed |

### Georgia Power: TOU-SC-15 (Time of Use-Supplier Choice Schedule)

| Load Size       | Minimum Demand | Applicability                                            | Optional/Mandatory | Implementation                                                                     | Contract Length | Status     |
|-----------------|----------------|----------------------------------------------------------|--------------------|------------------------------------------------------------------------------------|-----------------|------------|
| Demand ≥ 100 MW | N/A            | Applies to any customer with a load greater than 100 MW. | Mandatory          | No new tariff, but expansion of the Company's ability to create special contracts. | 5 - 15 years    | In effect. |

### Duke Energy Florida: LLCP (subject to criteria in LLC, LLCA, and CIAC)

| Load Size                                                                                                                          | Minimum Demand                                                                                                                                              | Applicability                                                                                        | Optional/Mandatory | Implementation                                                                                                                                                                 | Contract Length                                                   | Status   |
|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|----------|
| Demand ≥ 100 MW <u>or</u><br>Voltage ≥ 230 kV<br>90% of max DMD in 11 months <u>or</u><br>75% of contract demand <u>or</u><br>1 MW | Between 75% and 85% of annual Contract Capacity, excluding temporary, construction, bridging, and/or commission power as agreed to by Customer and Company. | This contract was created with Data Centers in mind but does not explicitly exclude other customers. | Mandatory          | Tariff applies to any individual Customer, for either a new or expanded facility. Customers need to enter into the Large Load Customer Agreement on file with the Florida PSC. | No less than 15 years.<br>Transitional Load Ramp Period Optional. | Proposed |

## Large Load Tariff Provisions For Areas With Significant Activity

### Eversky Kansas - Schedule LLPS (Large Load Power Service)

| Load Size      | Minimum Demand                          | Applicability                                                                                                     | Optional/Mandatory | Implementation                                                                                                             | Contract Length                                                                                                                                            | Status                         |
|----------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------------------|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Demand ≥ 75 MW | Minimum Demand: 80% of contract demand. | This tariff is <b>not</b> exclusive to data centers. Aggregation of premises is at the discretion of the utility. | Mandatory          | Would be a new, tariffed rate offering. Applies to all new loads and existing loads that plan to expand to threshold size. | Maximum Optional Ramp Period: 5 Years<br>Term of Service Period: 12 Years<br>Tariff Auto Extension Period: 5 Years<br>Minimum Cancellation Notice: 3 Years | Pending results of settlement. |

### Texas ERCOT (2025 Senate Bill 6 - Large Loads)

| Load Size      | Minimum Demand | Applicability                                                                                                                                                                                             | Optional/Mandatory | Implementation                                                                                                                                                                          | Contract Length                                | Status                                |
|----------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|---------------------------------------|
| Demand ≥ 75 MW | N/A            | This Bill will apply to all existing, and expanded interconnected loads above demand threshold. Requires all loads above threshold connecting to ERCOT to be flexible and participate in demand response. | Mandatory          | Per § 37.0561, 39.169, 39.170 - ERCOT may curtail loads and generation for new loads/generation; BTM/PUN arrangements need ERCOT and PUCT approval, utility can curtail new Large Loads | Applicable so long as demand threshold is met. | Passed and in effect. (June 20, 2025) |

### Minnesota Power - Large Light and Power Service

| Load Size              | Minimum Demand                                                                                   | Applicability                                                                                             | Optional/Mandatory | Implementation                                                                                     | Contract Length        | Status                             |
|------------------------|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------|----------------------------------------------------------------------------------------------------|------------------------|------------------------------------|
| 10 MW < Demand ≥ 50 MW | 75% of largest demand of the last 11 months<br><b>or</b><br>Largest adjusted demand minus 100 kW | This tariff applies to all customers who are within this usage threshold and have an ESA with the company | Mandatory          | Rate class is available to new or existing customers. New loads must stay within demand threshold. | Minimum Term: 10 Years | Approved; Effective March 1, 2025. |

### Virginia Power (VEPCO): LGS GS-5 (Large General Service)

| Load Size <sup>1</sup>       | Minimum Demand                                                                                      | Applicability                                                                                                                                              | Optional/Mandatory             | Implementation <sup>1</sup>                                                 | Contract Length                                             | Status                                |
|------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------------|-------------------------------------------------------------|---------------------------------------|
| Demand ≥ 50 MW (Stipulation) | Distribution: 75%<br>Transmission: 75%<br>Generation: Non-Shopping: 50%<br>Generation: Shopping: 0% | To all new customers who meet the demand criteria, except for those already under an existing ESA, but those customers can opt to take service under GS-5. | Mandatory only to new demands. | Shall apply to all customers beginning service on or after January 1, 2026. | Term of Service Minimum: 14 Years<br>Ramp Capacity: 4 Years | Tariff Case is still <b>Pending</b> . |

### DTE: Rate D13 - XL High Load Factor

| Load Size                                                                       | Minimum Demand                                                                                                                                                                                                                                                                  | Applicability                                                                                                                                                                                                                          | Optional/Mandatory      | Implementation                                | Contract Length                   | Status                              |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------------|-----------------------------------|-------------------------------------|
| Demand ≥ 50 MW<br>Load Factor Requirement: 75%<br>Power Factor Requirement: 85% | Minimum Annual Charge: (Contract Capacity*75%*Hours in Year) * (Power Supply Capacity charge + Power Supply Non-Capacity charge + Power Supply Transmission charge + Distribution charge + Administration charge) + (Delivery Charge*12) + Surcharges and Credits as applicable | This tariff <b>does not</b> apply to Data Centers: " <b>5) The rate is not available to serve the load associated with data centers.</b> " Only for new and incremental load service. Existing load will be under a separate schedule. | Tariff is not mandatory | This tariff is only for new incremental loads | Term of Service Minimum: 15 Years | This tariff has yet to be approved. |

### Ohio Power: Schedule DCT (Data Center Tariff)

| Load Size      | Minimum Demand                                                                                                                                                                           | Applicability                                                                                                                                                                             | Optional/Mandatory | Implementation                                      | Contract Length                                                                                | Status                   |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------|
| Demand ≥ 25 MW | <b>25 - 75 MW:</b> 15 MW + 85% of Marginal Amount over 25 MW<br><b>75+ MW:</b> 57,500 MW + 100% of Marginal Amount over 75 MW, provided the min demand is not >85% of contract capacity. | Tariff is applicable only to 'Data Centers' and 'Mobile Data Centers'. Existing loads will remain on current tariff or contract unless demand infeasible due to separate metering issues. | Mandatory          | DCT (Data Center Tariff) is a new, separate tariff. | Term of Service Minimum: 12 Years<br>Maximum Ramp Period: 4 Years<br>Full Load Period: 8 Years | Effective July 23, 2025. |

## Ameren Missouri

### Comparison of Current 11M (LPS) Tariff to Staff Recommended LLCS Tariff for a 25MW, 70% Load Factor Load (MoPSC ET-2025-0184)

| <u>Charge Type</u>                                    | <u>Billing Units<sup>1</sup></u> | <u>11M Rate<sup>2</sup></u> | <u>11M Cost</u> | <u>Proposed</u><br><u>LLCS Rates</u> | <u>Proposed</u><br><u>LLCS Cost</u> | <u>Increase</u> | <u>Percent</u><br><u>Increase</u> |
|-------------------------------------------------------|----------------------------------|-----------------------------|-----------------|--------------------------------------|-------------------------------------|-----------------|-----------------------------------|
|                                                       | (1)                              | (2)                         | (3)=(1)x(2)     | (4)                                  | (5)=(1)x(4)                         | (6)=(5)-(3)     | (7)=(6)/(3)                       |
| Customer Charge - per Month                           | 1                                | \$ 412.66                   | \$ 413          | \$ 10,000.00                         | \$ 10,000                           | \$ 9,587        | 2323.3%                           |
| Demand Charge 1 (\$/kW) - per Month                   | 25,000                           | \$ 15.05                    | \$ 376,333      | \$ 16.60                             | \$ 415,000                          | \$ 38,667       | 10.3%                             |
| Demand Charge 2 (\$/kW) - per month                   | 25,000                           | N/A                         | \$ -            | \$ 4.79                              | \$ 119,750                          | \$ 119,750      | New                               |
| Energy Charge (\$/kWh) - per Month                    | 12,775,000                       | \$ 0.038                    | \$ 488,857      | \$ 0.051                             | \$ 651,525                          | \$ 162,668      | 33.3%                             |
| Revenue Contribution (% of other charges) - per Month |                                  | N/A                         | \$ -            | 23.40%                               | \$ 279,928                          | \$ 279,928      | New                               |
| Total Monthly Cost                                    |                                  |                             | \$ 865,603      |                                      | \$ 1,476,203                        | \$ 610,601      | 70.5%                             |
| Total Annual Cost                                     |                                  |                             | \$10,387,232    |                                      | \$17,714,440                        | \$ 7,327,208    | 70.5%                             |
| Per Unit Cost - \$/MWh                                |                                  |                             | \$ 67.76        |                                      | \$ 115.55                           | \$ 47.80        | 70.5%                             |

<sup>1</sup>Assumes a demand of 25MW and a 70% load factor.

<sup>2</sup>Assumes a blended rate of 4 months summer and 8 months winter.

## Ameren Missouri

### Comparison of Current 11M (LPS) Tariff to Staff Recommended LLCS Tariff for a 100MW, 90% Load Factor Load (MoPSC ET-2025-0184)

| Charge Type                                                                | Billing Units <sup>1</sup> | 11M Rate <sup>2</sup> | 11M Cost     | Proposed LLCS Rates | Proposed LLCS Cost | Increase     | Percent Increase |
|----------------------------------------------------------------------------|----------------------------|-----------------------|--------------|---------------------|--------------------|--------------|------------------|
|                                                                            | (1)                        | (2)                   | (3)=(1)x(2)  | (4)                 | (5)=(1)x(4)        | (6)=(5)-(3)  | (7)=(6)/(3)      |
| Customer Charge - per Month                                                | 1                          | \$ 412.66             | \$ 413       | \$ 10,000.00        | \$ 10,000          | \$ 9,587     | 2323.3%          |
| Demand Charge 1 (\$/kW) - per Month                                        | 100,000                    | \$ 15.05              | \$ 1,505,333 | \$ 16.60            | \$ 1,660,000       | \$ 154,667   | 10.3%            |
| Demand Charge 2 (\$/kW) - per Month                                        | 100,000                    | N/A                   | \$ -         | \$ 4.79             | \$ 479,000         | \$ 479,000   | New              |
| Energy Charge (\$/kWh) - per Month                                         | 65,700,000                 | \$ 0.038              | \$ 2,514,120 | \$ 0.051            | \$ 3,350,700       | \$ 836,580   | 33.3%            |
| Revenue Contribution to Cover Other Costs (% of other charges) - per Month |                            | N/A                   | \$ -         | 23.40%              | \$ 1,286,930       | \$ 1,286,930 | New              |
| Total Monthly Cost                                                         |                            |                       | \$ 4,019,866 |                     | \$ 6,786,630       | \$ 2,766,764 | 68.8%            |
| Total Annual Cost                                                          |                            |                       | \$48,238,392 |                     | \$81,439,558       | \$33,201,166 | 68.8%            |
| Per Unit Cost - \$/MWh                                                     |                            |                       | \$ 61.19     |                     | \$ 103.30          | \$ 42.11     | 68.8%            |

<sup>1</sup>Assumes a demand of 100MW and a 90% load factor.

<sup>2</sup>Assumes a blended rate of 4 months summer and 8 months winter.