

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

POSITION STATEMENT OF GOOGLE LLC

Pursuant to the Order Establishing Procedural Schedule issued by the Missouri Public Service Commission (“Commission”) on July 10, 2025, Google LLC (“Google”) hereby files its Position Statement on issues identified in the Jointly Proposed List of Issues, as filed by the parties on November 5, 2025, and in light of the Non-Unanimous Global Stipulation and Agreement (“Non-Unanimous Settlement”) filed on November 7, 2025 and entered into by multiple parties, including Google. As noted in the Jointly Proposed List of Issues, the inclusion of an issue in the list does not mean that all parties agree with the characterization of the issue or that the matter identified is actually in dispute and/or that a Commission decision on the issue is proper or necessary in the case.

I. Position Statement

- A. *Should the Commission adopt Ameren Missouri’s or Staff’s conceptual tariff, rate structure, and pricing in order to comply with Mo. Rev. Stat. Section 393.130.7?*

The Commission should adopt Ameren’s Large Load Rate Plan, as modified by the terms of Non-Unanimous Settlement. The Commission should reject Staff’s conceptual tariff, rate structure, and pricing as insufficiently supported, unduly discriminatory, not based on costs, creates unjust rate instability, and impractical to implement, as further explained in the Surrebuttal Testimony of Dr. Berry.

- B. *Should Large Load Customer Electric Service (“LLCS”) be a subclass of the LPS or a stand-alone class?*

The Commission should adopt the LLCS as a sub-class of the LPS, as provided by the Non-Unanimous Settlement.

- C. *What should be the threshold demand load in megawatts (“MW”)/criteria for LLCS customers to receive service under a Commission approved LLCS tariff?*

The Commission should adopt the LLCS class applicability threshold of 75 MW as provided by the Non-Unanimous Settlement to better balance the range of customer sizes and cost characteristics of large load customers, reduce cost differentiation within both the existing Large Power Service (“LPS”) and the proposed LLCS sub-class, and align more closely with cost causation principles.

- a. *To the extent the threshold captures existing customers, should a grandfathering provision for such customer be adopted? What other existing programs and riders should or should not be available to LLCS customers, if any?*

Existing customers should be allowed to continue service under existing tariffs, except to the extent their load expands by 75 MW or more, as provided in the Non-Unanimous Settlement.

- D. *What other existing programs and riders should or should not be available to LLCS customers, if any?*

Google recommends that LLCS customers be eligible for certain riders as discussed and defined in the Non-Unanimous Settlement.

- E. *Should the LLCS customer bear responsibility for its interconnection and related non-FERC transmission infrastructure costs?*

Yes, LLCS customers should pay for such costs in the manner provided in Ameren’s Rules and Regulations, as modified by the Non-Unanimous Settlement language described at Paragraph 42 of the Non-Unanimous Settlement.

- a. *How should such interconnection and related non-FERC transmission infrastructure costs be accounted for or tracked, if at all?*

Google does not currently have a position on this issue, but reserves the right to take a position during or after the evidentiary hearing and in its post-hearing briefs.

- F. *What minimum term of service should be required for an LLCS customer to receive service under the Commission approved LLCS tariffs?*

Google recommends adopting a minimum term that includes up to five (5) years of an optional transitional load ramp period plus twelve (12) years, as provided in the Non-Unanimous Settlement.

- a. *What is the minimum and maximum ramp schedule?*

Google recommends an optional ramp schedule of up to five years, as provided in the Non-Unanimous Settlement.

- b. *What is the minimum term after the maximum ramp period ends?*

Google recommends a minimum 12-year term, as provided in the Non-Unanimous Settlement.

- c. *Is Elective Termination permitted? If so, then what is the appropriate Termination Fee?*

Yes, pursuant to the terms of Paragraphs 8 and 11 of the Non-Unanimous Settlement.

- G. *What minimum demand terms and conditions should apply to LLCS customers?*

Google recommends adopting the terms and conditions provided for in the Non-Unanimous Settlement, including a minimum monthly demand charge of 80% of the contract capacity.

- a. *What Maximum LLC Capacity reduction should be allowed?*

Google recommends adopting the capacity reduction terms provided in Paragraph 10 of the Non-Unanimous Settlement, including allowance for a 20% capacity reduction without charge.

- b. *Under what terms should a capacity reduction be allowed? How much should the capacity be in terms of percentage of the original Maximum LLC Capacity?*

Google recommends adopting the capacity reduction terms provided in Paragraphs 8 and 10 of the Non-Unanimous Settlement.

- c. *Under what terms should a subsequent contract reduction occur?*

Google recommends adopting the capacity reduction terms provided in Paragraphs 8 and 10 of the Non-Unanimous Settlement.

- d. *How should the Capacity Reduction Fee be determined?*

Google recommends adopting the capacity reduction terms provided in Paragraphs 8 and 10 of the Non-Unanimous Settlement.

H. *What collateral or other security requirements should be required for a LLCS customer to receive service under the Commission approved LLCS tariffs?*

Google recommends adopting the collateral terms provided in Paragraphs 19-32 of the Non-Unanimous Settlement.

I. *What should the notice requirements be, if any, for extension of service beyond the initial minimum term?*

Google recommends adopting the extension of service provisions set forth in Paragraph 8 of the Non-Unanimous Settlement.

J. *Should LLCS customers be included in the Fuel Adjustment Clause (“FAC”)?*

Pursuant to the terms of Paragraph 41 of the Non-Unanimous Settlement, Rider FAC should be changed in the next rate case consistent with the change proposed in Schedule SMW-D3 to Company witness Steve Wills’ Direct Testimony.

The Commission should reject Staff’s proposal to separate LLCS customers from other customers requiring they be registered with a separate Midcontinent Independent System Operator (“MISO”) commercial pricing node and excluded from the FAC.

a. *What impact will the inclusion of LLCS customers in the FAC have on non-LLCS customers and, if there is an impact, what if anything should the Commission order to address it?*

To the extent any impact occurs, the Commission should defer consideration of impacts until a general rate case for the reasons put forward in the Surrebuttal Testimonies of Steven Wills and Kevin Gunn.

b. *What, if any, changes should be made to Ameren Missouri’s existing FAC tariff sheet?*

See above responses.

c. *When/in what case should any changes be made?*

See above responses.

K. *Should LLCS customers be served from a separate, unique, designated load node?*

No. The Commission should reject Staff’s proposal as unduly discriminatory in its treatment of large load customers as a separate commercial pricing node and assigning charges based on that node, and imposing additional new charges on large load customers that are not imposed on other customers taking embedded cost service.

- L. *Is a waiver of RES requirements 20 CSR 4240.20.100(1)(W) and the authorizing statute lawful and reasonable with regard to LLCS customers?*

The variance from 20 CSR 4240-20.100 described in the Direct Testimony of Company witness Steve Wills should be granted.

- M. *How should revenues from LLCS customers be treated?*

The tracking mechanism outlined in Steve Will's Direct Testimony at page 52 for revenues from Riders RSP-LLC, CCAP, and NEC should be adopted.

The Commission should reject Staff's other proposed adjustments and provisions to address revenues from LLCS customers occurring between general rate cases for the reasons put forward in the Surrebuttal Testimonies of Steven Wills and Kevin Gunn.

- N. *What additional riders, if any, should be authorized by the Commission at this time, including:*

- a. *The Clean Capacity Advancement Program?*

Yes, as set forth at Paragraph 38 of the Non-Unanimous Settlement.

- b. *The Clean Energy Choice Program?*

Yes, as set forth at Paragraph 35 of the Non-Unanimous Settlement.

- c. *The Nuclear Energy Credit Program?*

Yes, as set forth at Paragraph 37 of the Non-Unanimous Settlement.

- d. *The Renewable Solutions Program – Large Load Customers?*

Yes, as set forth at Paragraph 36 of the Non-Unanimous Settlement.

- e. *The Clean Transition Tariff (as described in the Rebuttal Testimony of Dr. Carolyn Berry)?*

Pursuant to the terms of Non-Unanimous Settlement Agreement, Google is no longer proposing the Clean Transition Tariff at this time. It may be appropriate for the Commission to consider adoption of a program like the Clean Transmission Tariff in the future.

- O. *Should a form customer service agreement be included in the Commission approved LLCS tariffs resulting from this case?*

No, however, any LLCS Service Agreement should be consistent with approved tariffs, as provided in the Non-Unanimous Settlement Agreement.

a. *Should a form ESA be included in the pro forma LPS Tariff?*

No, however, any LLCS Service Agreement should be consistent with approved tariffs, as provided in the Non-Unanimous Settlement Agreement.

b. *Should the ESA require approval by the Commission?*

No, however, any LLCS Service Agreement should be consistent with approved tariffs, as provided in the Non-Unanimous Settlement Agreement.

c. *Should minimum filing requirements be required?*

No.

d. *What is the standard for review?*

Not applicable.

P. *Are changes needed for the Emergency Energy Conservation Plan tariff sheet and related tariff sheets to accommodate LLCS customers?*

Google does not currently have a position on this issue, but reserves the right to take a position during or after the evidentiary hearing and in its post-hearing briefs.

Q. *What studies should be required for customers to take service under the LLCS tariff, if any?*

Google does not currently have a position on this issue, but reserves the right to take a position during or after the evidentiary hearing and in its post-hearing briefs.

R. *What reporting on large load customers should the Commission require?*

No special reporting should be required.

S. *Should the Commission order a community benefits program as described in the testimony of Dr. Geoff Marke?*

Google does not currently have a position on this issue, but reserves the right to take a position during or after the evidentiary hearing and in its post-hearing briefs.

Dated: November 10, 2025

Respectfully submitted,

POLSINELLI PC

By: /s/ Frank A. Caro

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ATTORNEYS FOR GOOGLE, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed to all parties of record this 10th day of November, 2025.

/s/ Frank A. Caro