

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

POSITION STATEMENT OF AMAZON DATA SERVICES, INC.

Amazon Data Services, Inc. (“ADS”), pursuant to this Commission’s July 10, 2025, *Order Establishing Procedural Schedule*, and for its Position Statement, states as follows:

On November 7, 2025, a *Non-Unanimous Global Stipulation and Agreement* (“Stipulation”) was filed in this docket resolving all pending issues and signed by Ameren, Amazon Data Services, Inc., Evergy Metro, Inc., Evergy Missouri West, Inc., Google LLC, Renew Missouri, Missouri Industrial Energy Consumers, and Sierra Club.¹ This position statement reflects the positions of ADS as modified by the stipulation.

Issue 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?

Position: The Commission should adopt Ameren Missouri's conceptual tariff framework with the modifications outlined in the Non-Unanimous Global Stipulation and Agreement ("Stipulation"). The Commission should reject Staff's conceptual tariff in its entirety.

Issue B: Should Large Load Customer Electric Service ("LLCS")

¹ On November 9, 2025, Ameren filed a Corrected *Non-Unanimous Global Stipulation and Agreement*.

be a subclass of the LPS or a stand-alone class?

Position: LLCS should be a subclass of Service Classification 11(M) – Large Primary Service.

Issue C: What should be the threshold demand load in megawatts ("MW")/criteria for LLCS customers to receive service under a Commission approved LLPS tariff?

Position: Consistent with the Stipulation, the threshold should be seventy-five megawatts (75 MW) or more of peak load forecast at any time during the Term or Extension Term.

Issue D: What other existing programs and riders should or should not be available to LLCS customers, if any?

Position: Consistent with the Stipulation, LLCS customers should be subject to Rider FAC, Rider EEIC (subject to opt-out rights), Rider SUR, Rider RESRAM (unless sufficient RECs are retired via Rider RSP-LLC), and the Cost Stabilization Rider (CSR). New clean and renewable energy riders (CEC, RSP-LLC, NEC, CCAP) should be available on a voluntary basis.

Issue E: Should the LLPS customer bear responsibility for its interconnection and related non-FERC transmission infrastructure costs?

Position: Consistent with the Stipulation, LLCS customers should pay all costs associated with extensions of transmission or substation facilities, excluding network upgrade costs for facilities classified as transmission under the MISO Open Access Transmission Tariff.

Issue F: What minimum term of service should be required for an LLCS customer to receive service under the Commission approved

LLCS tariffs?

Position: Consistent with the Stipulation, the minimum term should be up to five (5) years of optional transitional load ramp period plus twelve (12) years.

Issue F(a): What is the minimum and maximum ramp schedule?

Position: The ramp schedule should be flexible, with a maximum of five (5) years.

Issue F(b): What is the minimum term after the maximum ramp period ends?

Position: Twelve (12) years after the ramp period ends.

Issue F(c): Is Elective Termination permitted? If so, then what is the appropriate Termination Fee?

Position: Yes, elective termination should be permitted with the appropriate notice, and exit/early termination fees detailed in the Stipulation.

Issue G: What minimum demand terms and conditions should apply to LLCS customers?

Position: Consistent with the Stipulation, LLCS customers should be subject to a Minimum Monthly Bill based on 80% of Contract Capacity ("Minimum Demand"), calculated as specified in the Stipulation.

Issue G(a): What Maximum LLC Capacity reduction should be allowed?

Position: Consistent with the Stipulation, with a 24 month notice, a one-time capacity reduction up to 20% of Contract Capacity should be allowed without charge ("Permissible Capacity Reduction"). Beyond that, reductions

should be permitted subject to a Capacity Reduction Fee (subject to Company mitigation efforts), as outlined in the Stipulation.

Issue G(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?

Position: See Issue G(a).

Issue G(c) Under what terms should a subsequent contract reduction occur? See Issue G(a).

Issue G(d): How should the Capacity Reduction Fee be determined?

Position: Consistent with the Stipulation, the Capacity Reduction Fee should be calculated as $2 \times$ the difference between nominal Minimum Monthly Bills (before and after reduction) $\times$ the lesser of 60 months or remaining Term/Extension Term. The Company should be required to use reasonable efforts to mitigate through capacity sales, with proceeds refunded to customer (not to exceed the fee paid).

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

Position: LLCS customers should provide collateral equal to two (2) years of Minimum Monthly Bills, with tiered discounts (60%, 50%, 40%, or 25%) based on credit ratings and liquidity requirements as detailed in the Stipulation.

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

Position: The LLCs Service Agreement should automatically extend for five-year Extension Terms unless either party provides at least thirty-six (36) months' written notice of intent not to renew or to renew at reduced Contract Capacity, unless otherwise mutually agreed in the Service Agreement.

Issue J: Should LLCs customers be included in the Fuel Adjustment Clause ("FAC")?

Position: Yes, LLCs customers should be subject to Rider FAC.

Issue J(b): What, if any, changes should be made to Ameren Missouri's existing FAC tariff sheet?

Position: As addressed in the Stipulation, changes consistent with Schedule SMW-D3 to Company witness Steve Wills' Direct Testimony should be made.

Issue J(c) When/in what case should any changes be made?

Position: Changes should be made in the Company's next rate case.

Issue K: Should LLCs customers be served from a separate, unique, designated load node?

Position: No.

Issue 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?

Position: Yes, the variance should be granted.

Issue M: How should revenues from LLCs customers be treated?

Position: Consistent with the Stipulation, revenues should be treated

as specified in the Initial Pricing provisions of the Stipulation, with a comparison mechanism to Service Classification 11(M) revenues for CCOS study purposes until the first rate case with LLCS customers reflected in the test year.

Issue N: What additional riders, if any, should be authorized by the Commission at this time?

Position: The Commission should authorize four new optional clean and renewable energy riders: Clean Energy Choice (CEC), Renewable Solutions Program for Large Load Customers (RSP-LLC), Nuclear Energy Credit (NEC), and Clean Capacity Advancement Program (CCAP).

Issue N(a): The Clean Capacity Advancement Program?

Position: Yes, Rider CCAP should be approved as described in the Stipulation.

Issue N(b): The Clean Energy Choice Program?

Position: Yes, Rider CEC should be approved as described in the Stipulation.

Issue N(c): The Nuclear Energy Credit Program?

Position: Yes, Rider NEC should be approved as described in the Stipulation.

Issue N(d): The Renewable Solutions Program – Large Load Customers?

Position: Yes, Rider RSP-LLC should be approved as described in the Stipulation.

Issue O: Should a form customer service agreement be included

in the Commission approved LLCS tariffs resulting from this case?

Position: No, a form ESA should not be included in the tariff itself. The tariff should contain comprehensive terms and conditions, with LLCS Service Agreements required to be consistent with those approved tariff terms.

Issue O(a): Should a form ESA be included in the pro forma LPS Tariff?

Position: No.

Issue O(b): Should the ESA require approval by the Commission?

Position: No. ESAs should be required to be consistent with the approved tariff, but should not require separate Commission approval.

Issue O(c): Should minimum filing requirements be required?

Position: No separate filing requirements should be needed given ESAs will not require Commission approval.

Issue (P): Are changes needed for the Emergency Energy Conservation Plan tariff sheet and related tariff sheets to accommodate LLCS customers?

Position: No. Consistent with the Stipulation, the Commission should reject Staff's position on this issue.

Issue R: What reporting on large load customers should the Commission require?

Position: Consistent with the Stipulation, the Company should provide an annual compliance report to the Commission containing information on: (i) the number of new or expanded customers enrolled in Schedule LLCS and (ii) the total estimated load enrolled under Schedule LLCS.

Other Issues

With respect to all other issues, ADS takes no position at this time but reserves the right to do so based on pre-filed testimony and the evidence presented at hearing.

WHEREFORE, Amazon Data Services, Inc. respectfully submits this Statement of Position for the Commission's consideration.

Respectfully submitted,

ELLINGER BELL LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on November 10, 2025.

/s/ Stephanie S. Bell