

Exhibit No. 102

Staff – Exhibit 102
Testimony of Amanda Arandia
Surrebuttal
Case No. ET-2025-0184

Exhibit No.:
Issue(s): Renewable Tariffs
Witness: Amanda Arandia
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: ET-2025-0184
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

SURREBUTTAL TESTIMONY

OF

AMANDA ARANDIA

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. ET-2025-0184

*Jefferson City, Missouri
November 2025*

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AMANDA ARANIDA
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1 renewable energy rider options to LLCs needs to be addressed at the earliest opportunity, which
2 would be in this case.”² Does Staff agree?

3 A. Not entirely. Staff agrees that potential LLC customers need renewable energy
4 purchase options, however the tariffs proposed in this case are not the only option available.
5 LLC customers can purchase RECs directly from Ameren Missouri outside of a tariff, and with
6 or without a contract to do so. If Ameren Missouri would like to offer these programs as tariffs,
7 it is Staff’s position that the details need to be addressed and correct. In this particular case,
8 Ameren Missouri has proposed tariffs that are lacking in all of the basic details because it is
9 Ameren Missouri’s intention to have the details specified in contracts with the LLC customers.
10 Staff does not have an issue with Ameren Missouri making contracts with its LLC customers,
11 nor does it have an issue with Ameren Missouri adding renewable programs for LLC customers;
12 however, it does have an issue with tariffs that do not include basic program details.

13 Q. In her testimony, Ms. Sentell states that RSP-LLC will “help Ameren Missouri
14 reach their stated sustainability goals of ‘net-zero carbon emissions by 2045.’” What is
15 Staff’s response?

16 A. The RSP-LLC is a program to sell RECs to large load customers. This does not
17 directly help Ameren Missouri reach its sustainability goals. To reach its sustainability goals,
18 Ameren Missouri would need to add more renewable resources or purchase bundled or
19 unbundled RECs. If the existence of the program were to mean that Ameren Missouri would
20 do this, then it could help Ameren Missouri reach its sustainability goals. However, in response
21 to Staff DR 26 Ameren Missouri stated that the resources that would serve the proposed
22 programs would be implemented irrespective of the existence of the programs.

² Rebuttal testimony of Jessica Polk Sentell, page 4, lines 10-11.

1 Q. Does Staff have any additional concerns with Rider RSP-LLC?

2 A. Yes. Ameren Missouri has not provided enough program details for Staff to be
3 able to recommend approval and Staff questions the need for such a tariff lacking in basic
4 program details when Ameren Missouri can already sell RECs to its large load customers
5 outside of a tariff, with or without a contract.³ Further, Staff continues to be concerned that
6 Ameren Missouri continues to propose more tariffs to sell RECs to its customers while at the
7 same time it is unable to comply with its own Renewable Energy Standard requirements without
8 purchasing RECs, requesting variances related to retirement timing and requesting in this very
9 case a variance to exclude its sales to large load customers from its Renewable Energy
10 Standard requirement.⁴

11 **CLEAN CAPACITY ADVANCEMENT PROGRAM**

12 Q. What is the Clean Capacity Advancement Program (“CCAP”)?

13 A. CCAP is a program that Ameren Missouri has proposed which would allow
14 large load customers to subscribe to and support a specific capacity of battery or other
15 energy storage.

16 Q. Why did Staff recommend the Commission reject this program?

17 A. Ameren Missouri has not provided enough program details for Staff to be able
18 to recommend approval of the program. Additionally, Staff questions the need for such
19 a program.

20 Q. Ms. Sentell stated in her Rebuttal Testimony “CCAP will help customers reach
21 their own sustainability goals by adding clean capacity and will help cover the costs of adding

³ 20 CSR 4240-20.100(3)(I).

⁴ See Case Nos. EE-2024-0376, EE-2024-0037, EE-2023-0127, EE-2022-0074.

Surrebuttal Testimony of
Amanda Arandia

1 sustainable generation and storage to Ameren Missouri's generation and storage portfolio.”⁵

2 Does Staff agree with this statement?

3 A. No. Ameren Missouri has not provided sufficient information for Staff to be
4 able to say that Ms. Sentell's statement is true. Whether the program would help a customer
5 reach their own sustainability goals depends on what those goals are. This program is to support
6 battery energy storage which wouldn't directly be added to the participating customer; it would
7 be connected to the grid where it would contribute to the overall mix of energy. Staff also
8 cannot say for certain that the program will help cover the costs of adding sustainable
9 generation, or if so, to what extent, because Ameren Missouri has neither provided any
10 information regarding program pricing and fees,⁶ nor has Ameren Missouri specified treatment
11 of program revenues. Additionally, as previously stated, in response to Staff DR 26,
12 Ameren Missouri stated that the resources that would serve the program would be implemented
13 irrespective of the existence of the programs, which suggests the costs of such resources could
14 fall to all ratepayers.

15 Q. Does this conclude your surrebuttal testimony?

16 A. Yes, it does.

⁵ Rebuttal testimony of Jessica Polk Sentell, page 6, lines 11-14.

⁶ Staff Data Request 29.

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

AFFIDAVIT OF AMANDA ARANDIA

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

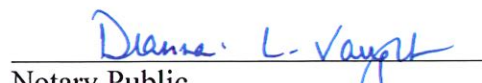
COMES NOW AMANDA ARANDIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Amanda Arandia*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


AMANDA ARANDIA

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29th day of October 2025.


Notary Public

