

FILED  
June 28, 2023  
Data Center  
Missouri Public  
Service Commission

# Exhibit No. 302

MLA – Exhibit 302  
DR G39  
File No. EA-2023-0017

~~XXXXXXXXXX~~

**G39.** In his Direct Testimony, Mr. Rodriguez indicates the projected costs for network upgrades are as follows:

MISO: \$110,750,000 (Testimony, p. 21, line 8).  
AECI: \$177,656,953 (Testimony, p. 21, lines 16-17)  
PJM, AF1-088: \$200,020,000 (Testimony, p. 25, lines3-4)  
PJM, AF2-008: \$164,875,800 (Testimony, p. 26, line14).  
[Total equals \$653,302,753].

Please explain the difference between the \$750,000,000 cost for network upgrades referred to by Mr. Repsher in G37, and the total of the above costs described by Mr. Rodriguez.

**Response:** The way the costs are listed above do not reflect accurately what my testimony indicates. Based on my testimony, the costs should have been listed as follows:

MISO MHCP: \$110,750,000 (Testimony, p. 21, line 8).  
MISO DPP2 for injection rights (including AECI affected system upgrades): \$177,656,953 (Testimony, p. 21, lines 16-17)  
AECI (including MISO affected system upgrades): \$98,618,000 (Testimony, p. 22, line 15)  
PJM, AF1-088: \$200,020,000 (Testimony, p. 25, lines3-4)  
PJM, AF2-008: \$164,875,800 (Testimony, p. 26, line14).  
[Total equals \$751,920,753]

Some of these numbers are now outdated, as MISO, Ameren, and AECI completed studies in recent months that have changed the totals for several of the above-listed values, as noted below.

MISO MHCP (Testimony, p. 21, line 8)

- Testimony Value: \$110,750,000
- Updated Value: \$144,248,000

MISO DPP3 for injection rights (including AECI affected system upgrades) (Testimony, p. 21, lines 16-17)

- Testimony Value: \$177,656,953
- Updated Value: \$180,358,100

With those updated totals, the new total increases from \$751,920,753 to \$788,119,900.

