

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

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri’s Request for Deferral and )  
Amortization Authority Relating to Certain ) File No. EU-2020-0114  
Callaway Energy Center Operations and Maintenance )  
Expenses. )

**STIPULATION AND AGREEMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), and the Missouri Industrial Energy Consumers ("MIEC") (collectively referred to hereinafter as the "Signatories"),<sup>1</sup> and hereby submit this Stipulation and Agreement ("Stipulation"), as follows:

**I. BACKGROUND**

1. On October 28, 2019, the Company filed its Application for Deferral and Amortization Authority and for Waiver of 20 CSR 4240-4.017(1) (the "Application"). The Application sought authority to defer and amortize certain costs related to Callaway Energy Center ("Callaway") refueling outages.

2. MIEC and MECG timely filed applications to intervene, which were granted by order dated November 14, 2019.

3. In accordance with the Commission’s October 29, 2019 *Amended Order Directing Notice, Setting Intervention Deadline and Directing Staff Recommendation*, the Staff filed a Staff Recommendation on December 27, 2019 in which Staff recommended approval of the Application (including the waiver request).

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<sup>1</sup> The remaining party to this case, Midwest Energy Consumers Group ("MECG"), has authorized the Signatories to indicate that MECG does not oppose approval of this Stipulation and Agreement.

4. In the interim between the October 29, 2019 and the filing of the Staff Recommendation on December 27, 2019, OPC, MIEC, and MECG jointly raised potential issues with the Application and requested a procedural conference be held to discuss them. The Commission initially scheduled a procedural conference for December 30, 2019, but by agreement among the Signatories the procedural conference was postponed and ultimately cancelled. Instead, the parties have conferred among themselves to discuss the concerns that were raised, which have been resolved according to the terms of this Stipulation.

## **II. STIPULATIONS AMONG THE SIGNATORIES**

5. The Signatories agree (on and subject to the conditions specified below) that the Commission should issue its order authorizing Ameren Missouri, starting with “Refuel O & M costs”<sup>2</sup> incurred and to be incurred for Callaway refueling outage number 24 (which will commence in the fall of 2020),<sup>3</sup> and for subsequent refueling outages, to defer such costs to Federal Energy Regulatory Commission (“FERC”) Uniform System of Account No. 174 and to amortize the deferred costs as follows:

- a. Ameren Missouri will track the deferred costs within Account No. 174 to allow direct assignment of the costs, via an amortization of the costs to FERC Account No. 524 (miscellaneous nuclear power expenses) and FERC Account No. 530 (maintenance of reactor plant equipment), as appropriate. The amortization will begin in the month Callaway is brought back online after completion of each refueling outage if such date occurs on or before the 15<sup>th</sup> day of the month in which Callaway is brought back online; otherwise, the amortization will begin in the month following the month in which Callaway is brought back online; and
- b. The deferral shall be on straight line basis starting in the month described above and ending the month prior to the month in which amortization of the next refueling outage is scheduled to begin.

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<sup>2</sup> “Refuel O & M costs” consist of Callaway refueling outage operations and maintenance costs, except base internal labor, and includes overtime costs.

<sup>3</sup> The Company’s Application mistakenly indicated that refueling outage No. 24 started in September 2019. The correct commencement date for outage No. 24 is the fall of 2020.

6. This agreement does not bind the Commission to any particular ratemaking treatment of the Refuel O & M costs and will not preclude any party from proposing any ratemaking treatment for refueling costs in future rate proceedings; provided, that the deferral balance shall not be included in the Company's rate base for ratemaking purposes.

7. The agreement of the Signatories to the deferral and amortization treatment specified in paragraph 5 is based upon unique factors regarding the accounting and ratemaking treatment of these particular costs. The Signatories expressly state that the terms of this Stipulation are not based in any way on application of the "extraordinary" standard the Commission has employed in the past to determine whether utility requests for accounting authority orders should be granted. The terms of this Stipulation are not to be interpreted as establishing any precedent for future utility requests for accounting authority orders or other alternative accounting treatments involving other costs.

**WHEREFORE**, the Signatories request that the Commission make and enter its order approving the foregoing Stipulation and Agreement granting the Company the deferral and amortization authority set forth herein, on and subject to the terms and conditions set forth herein.

Respectfully submitted,

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**Attorneys for the Missouri Industrial Energy  
Consumers**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Stipulation and Agreement has been e-mailed, this 29<sup>th</sup> day of January, 2020, to counsel for all parties of record.

/s/ James B. Lowery

James B. Lowery