

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

Application of Union Electric Company, d/b/a)	
Ameren Missouri for Approval of Decommissioning)	
Cost Estimate for Callaway Energy Center and)	File No. EO-2015-0253
Funding Level of Nuclear Decommissioning)	
Trust Fund.)	

STATUS REPORT

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and for its Status Report states as follows:

1. An Application in this case was originally filed by Ameren Missouri on April 1, 2015. The Application requested Missouri Public Service Commission (Commission) approval of Ameren Missouri’s decommissioning cost estimate for the Callaway Energy Center and the continuation of the funding level of its nuclear decommissioning trust fund at the current annual amount. The Commission has not yet ruled on the request.

2. On August 11, 2015, the Commission ordered its Staff to respond to Ameren Missouri’s Application no later than November 2, 2015. For reasons described further in this pleading, Ameren Missouri requests the Commission accept this Status Report in lieu of a Staff response.

3. Subsequent to the filing of the Application, an additional scope for decommissioning has developed. This additional scope was not included in the decommissioning cost estimate submitted as part of this filing. Specifically, this involves the decommissioning of the Independent Spent Fuel Storage Installation (“ISFSI”) that has been constructed at the Callaway Energy Center.

4. The operating license for the Callaway Energy Center, renewed on March 6, 2015, expires on October 18, 2044. Approximately 3,782 spent fuel assemblies are currently

projected to be generated over the life of the plant. Because of the failure by the Department of Energy (DOE) to fulfill its contract to remove fuel from the site, an ISFSI has been constructed with spent fuel to be transferred to the dry storage modules located at the ISFSI to support continued plant operations.

5. Ameren Missouri's current spent fuel management plan for the Callaway spent fuel is based in general upon the spent fuel being fully removed from the Callaway site by 2050. At the conclusion of the spent fuel transfer process the ISFSI will be promptly decommissioned.

6. It is estimated that the total decommissioning cost of the ISFSI will be approximately \$8.5 million (2015 dollars) with decommissioning activities occurring fully in 2051, concurrent with the plant decommissioning process. Funding this decommissioning cost will require additional contributions to the decommissioning trust fund of approximately \$0.5 million annually.

7. On an ongoing basis, Ameren Missouri intends to obtain updated site-specific decommissioning cost estimates for the ISFSI concurrently with updated plant decommissioning cost estimates and file both on a triennial basis with the Commission, along with updated funding level analyses, as required by Missouri regulations. The next decommissioning cost estimate will be filed by September 1, 2017, and then every three (3) years thereafter. Concurrent with these MPSC filings, updated ISFSI cost estimates and funding level analyses will be submitted to the NRC in accordance with 10 CFR 72.30(c).

8. A separate sub-account will be established within the external sinking fund to segregate the ISFSI decommissioning funding from the plant decommissioning funding. Ameren Missouri will refund to Missouri ratepayers any DOE reimbursement amounts received

for costs of decommissioning the ISFSI, whereby Ameren Missouri previously collected those decommissioning costs from Missouri ratepayers as Missouri rate tariffs.

9. As the Commission has not yet ruled upon on the April 1, 2015 request, Ameren Missouri believes it would be best for it to submit a revised Application so it can submit the ISFSI decommissioning cost estimate and funding level analysis. This will allow the Commission to address both issues on a consolidated basis. Revised rate tariffs will also be submitted in order for the additional ISFSI decommissioning costs to be recovered from ratepayers.

10. The Company has met with the Commission Staff and briefed them on the proposed supplemental filing, and the Company believes there is general agreement on the proposed course of action.

11. Ameren Missouri intends to make the “supplemental” filing by November 30, 2015. As a result of the recent plant operating license extension approved by the NRC and due to the increase in contributions to the tax-qualified decommissioning trust fund for ISFSI decommissioning, it is necessary for the Company to request a revised “Schedule of Ruling Amounts” from the Internal Revenue Service (IRS). This request must be filed with the IRS no later than March 15, 2016. If the Commission could issue its Order in this Case by December 31, 2015, it would be beneficial as the Company could use it as the basis for the filing with the IRS.

WHEREFORE, Ameren Missouri respectfully requests that the Missouri Public Service Commission accept this pleading in lieu of a Staff Report and allow Ameren Missouri until November 30, 2015, to file a revised Application to include ISFSI decommissioning costs.

Respectfully submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro, # 60261

Director and Assistant General Counsel

Ameren Missouri

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-3484 (phone)

(314) 554-4014 (fax)

AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 2nd day of November, 2015 to counsel for all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro