

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

**JOINTLY PROPOSED LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
LIST AND ORDER OF WITNESSES, AND ORDER OF CROSS-EXAMINATION**

COMES NOW, the Staff of the Missouri Public Service Commission, on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding. In preparing this list of issues, the parties attempted to list all contested issues, and attempted to obtain consensus on the descriptions of the issues. Not all parties agree with the wording or inclusion of all of the issues set out herein. The inclusion of an issue in the list does not mean that all parties agree with the characterization of the issue or that the matter identified is actually in dispute and/or that a Commission decision on the issue is proper or necessary in this case.

I. List of Issues

- 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?
- B. Should Large Load Customer Electric Service ("LLCS") be a subclass of the LPS or a stand-alone class?
- C. What should be the threshold demand load in megawatts ("MW")/criteria for LLCS customers to receive service under a Commission approved LLPS tariff?
 - a. To the extent the threshold captures existing customers, should a grandfathering provision for such customer be adopted?

- D. What other existing programs and riders should or should not be available to LLCS customers, if any?
- E. Should the LLPS customer bear responsibility for its interconnection and related non-FERC transmission infrastructure costs?
 - a. How should such interconnection and related non-FERC transmission infrastructure costs be accounted for or tracked, if at all?
- F. What minimum term of service should be required for an LLCS customer to receive service under the Commission approved LLCS tariffs?
 - a. What is the minimum and maximum ramp schedule?
 - b. What is the minimum term after the maximum ramp period ends?
 - c. Is Elective Termination permitted? If so, then what is the appropriate Termination Fee?
- G. What minimum demand terms and conditions should apply to LLCS customers?
 - a. What Maximum LLC Capacity reduction should be allowed?
 - 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?
 - c. Under what terms should a subsequent contract reduction occur?
 - d. How should the Capacity Reduction Fee be determined?
- H. What collateral or other security requirements should be required for a LLCS customer to receive service under the Commission approved LLCS tariffs?
- I. What should the notice requirements be, if any, for extension of service beyond the initial minimum term?
- J. Should LLCS customers be included in the Fuel Adjustment Clause ("FAC")?
 - a. What impact will the inclusion of LLCS customers in the FAC have on non-LLCS customers and, if there is an impact, what if anything should the Commission order to address it?
 - b. What, if any, changes should be made to Ameren Missouri's existing FAC tariff sheet?
 - c. When/in what case should any changes be made?
- K. Should LLCS customers be served from a separate, unique, designated load node?
- 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?
- M. How should revenues from LLCS customers be treated?

- N. What additional riders, if any, should be authorized by the Commission at this time, including:
 - a. The Clean Capacity Advancement Program?
 - b. The Clean Energy Choice Program?
 - c. The Nuclear Energy Credit Program?
 - d. The Renewable Solutions Program – Large Load Customers?
 - e. The Clean Transition Tariff (as described in the Rebuttal Testimony of Dr. Carolyn Berry)?
- O. Should a form customer service agreement be included in the Commission approved LLCS tariffs resulting from this case?
 - a. Should a form ESA be included in the pro forma LPS Tariff?
 - b. Should the ESA require approval by the Commission?
 - c. Should minimum filing requirements be required?
 - d. What is the standard for review?
- P. Are changes needed for the Emergency Energy Conservation Plan tariff sheet and related tariff sheets to accommodate LLCS customers?
- Q. What studies should be required for customers to take service under the LLCS tariff, if any?
- R. What reporting on large load customers should the Commission require?
- S. Should the Commission order a community benefits program as described in the testimony of Dr. Geoff Marke?

II. Order of Opening Statements

Union Electric Company d/b/a Ameren Missouri
 Staff of the Missouri Public Service Commission
 Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (collectively “Evergy”)
 The Empire District Electric Company d/b/a Liberty
 Google LLC
 Amazon Data Services, Inc.
 Missouri Industrial Energy Consumers
 Sierra Club
 Renew Missouri
 Office of the Public Counsel

III. List and Order of Witnesses

Ajay K. Arora (Ameren Missouri)
 Robert B. Dixon (Ameren Missouri)
 Darryl Sagel (Ameren Missouri)
 Matt Michels (Ameren Missouri)
 Steven M. Wills (Ameren Missouri)
 Shawn Lange (Staff)

Michael L. Stahlman (Staff)¹
Brooke Mastrogiannis (Staff)
Jordan Hull (Staff)
Brad Fortson (Staff)
Amanda Arandia (Staff)
Brodrick Niemeier (Staff)
Claire Eubanks (Staff)
J Luebbert (Staff)
Sarah Lange (Staff)²
Kevin D. Gunn (Eversource)
Ryan Hledik (Eversource)
Carolyn A. Berry (Google LLC)
Albert W. Bremser (Amazon Data Services, Inc.)³
Maurice Brubaker (Missouri Industrial Energy Consumers)
Caroline Palmer (Sierra Club)
Jessica Polk Sentell (Renew Missouri)
Lena Mantle (OPC)
Geoff Marke (OPC)

IV. Order of Cross-Examination

Union Electric Company d/b/a Ameren Missouri Witnesses

Liberty
Eversource
Renew Missouri
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Google LLC
Sierra Club
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Staff of the Missouri Public Service Commission Witnesses

Office of the Public Counsel
Sierra Club
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Google LLC
Renew Missouri

¹ This witness is unavailable the morning of November 18 and may be called out of order if necessary.

² This witness is unavailable on November 17 and 18 and may be called out of order if necessary.

³ This witness is unavailable after noon on Friday, November 21.

Liberty
Eversgy
Ameren Missouri

Eversgy Witnesses

Ameren Missouri
Liberty
Google LLC
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Renew Missouri
Sierra Club
Staff of the Missouri Public Service Commission
Office of the Public Counsel

Google LLC Witness

Amazon Data Services, Inc.
Missouri Industrial Energy Consumers
Renew Missouri
Liberty
Eversgy
Ameren Missouri
Sierra Club
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Amazon Data Services, Inc. Witness

Google LLC
Missouri Industrial Energy Consumers
Renew Missouri
Ameren Missouri
Eversgy
Liberty
Sierra Club
Staff of the Missouri Public Service Commission
Office of the Public Counsel

Missouri Industrial Energy Consumers Witness

Renew Missouri
Eversgy
Ameren Missouri
Liberty
Google LLC

Amazon Data Services, Inc.
Sierra Club
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Sierra Club Witness

Renew Missouri
Staff of the Missouri Public Service Commission
Office of the Public Counsel
Google LLC
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Liberty
Eversource
Ameren Missouri

Renew Missouri Witness

Sierra Club
Eversource
Ameren Missouri
Liberty
Google LLC
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Office of the Public Counsel
Staff of the Missouri Public Service Commission

Office of Public Counsel Witnesses

Staff of the Missouri Public Service Commission
Sierra Club
Missouri Industrial Energy Consumers
Amazon Data Services, Inc.
Google LLC
Renew Missouri
Liberty
Eversource
Ameren Missouri

Respectfully Submitted,

/s/ Alexandra Klaus

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**Attorneys for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record on this 5th day of November, 2025.

/s/ Alexandra Klaus