

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

In the Matter of the Adjustment of Union)	
Electric Company d/b/a Ameren Missouri's)	<u>File No. ER-2022-0091</u>
RESRAM rate for the Third Accumulation Period)	Tariff No. YE-2022-0063

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through counsel, and states in its *Staff Recommendation to Approve Tariff Sheet*:

1. On September 29, 2021, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed a revised tariff sheet and the supporting testimony of J. Neil Grasser to adjust its renewable energy standard adjustment mechanism ("RESRAM") pursuant to Commission Rule 20 CSR 4240-20.100. The tariff sheet bears an effective date of February 1, 2022.

2. Also on September 29, 2021, the Commission directed Staff to file a recommendation regarding the proposed tariff sheet by November 29, 2021.

3. As detailed in Staff's *Memorandum*, attached as Appendix A, Staff reviewed Ameren's data and calculations related to its proposed tariff sheet and recommends that the Commission issue an order approving the tariff sheet or allow the tariff sheet to go into effect by operation of law on February 1, 2022. The prospective RESRAM rate is (\$0.00104), a credit to customers. Customers using 1,000 kWh per month will have a \$1.04 billing credit, a \$1.21/kWh decrease compared to the previous period RESRAM rate of \$0.00017. Application of this rate will not exceed the annual rate cap pursuant to Section 393.1655, RSMo.

4. Staff verified that Ameren filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

WHEREFORE, Staff recommends that the Commission issue an order approving the following tariff sheet Ameren filed on September 29, 2019, with an effective date of February 1, 2022, or allow the tariff sheet to go into effect by operation of law that same date:

P.S.C. MO. No. 6
4th Revised Cancelling 3rd Revised Tariff Sheet No. 93.4

Respectfully submitted,
/s/ Karen E. Bretz
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CERTIFICATE OF SERVICE

I certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 29th day November, 2021.

/s/ Karen E. Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2022-0091 and Tariff Tracking No. YE-2022-0063

FROM: Nancy L. Harris, Senior Utility Regulatory Auditor

/s/ Nancy L. Harris / 11-29-2021
Tariff/Rate Design Dept. / Date

/s/ Karen Bretz / 11-29-2021
Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve the Tariff Sheet Filed to Adjust the Renewable Energy Standard Rate Adjustment Mechanism of Union Electric Company, d/b/a Ameren Missouri.

DATE: November 29, 2021

BACKGROUND

On September 29, 2021, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri") filed a tariff and supporting testimony to implement a rate adjustment under its Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") for the 3rd accumulation period ending July 31, 2021, pursuant to Commission Rule 20 CSR 4240-20.100. The submitted tariff sheet bore an effective date of February 1, 2022 and was filed in Tariff Tracking No. YE-2022-0063.

The total actual RESRAM expense for the accumulation period ending July 31, 2021 was (\$9,560,337) which includes (\$28,429,490) of Production Tax Credit¹ benefits. Total RES Costs Recovered for the same accumulation period were \$5,655,625. The annual RESRAM Revenue Requirement going forward is (\$16,660,719). Total RESRAM Recoveries to be recovered from February 1, 2022 through July 31, 2023 are (\$31,868,138), which include the going forward revenue requirement of (\$16,660,719), a true-up amount of \$9,630 and an over recovery of RESRAM expenses over the accumulation period of \$15,217,049. The chart below illustrates this.

Actual RES Costs Incurred in Accumulation Period (Actual RES Costs)	\$ (9,560,337)
LESS RES Expenses Recovered in Accumulation Period (RES Costs Recovered)	\$ 5,655,625
RES Over/Under Recovery	\$ (15,215,962)
Interest	\$ (1,087)
(Over)/Under Recovered Costs	(15,217,049)
RES Revenue Requirement	\$ (16,660,719)
True-Up	\$ 9,630
Total RESRAM Recoveries (TRR)	(31,868,138)

¹ The renewable electricity production tax credit (PTC) is a per kilowatt-hour (kWh) federal tax credit included under Section 45 of the U.S. tax code for electricity generated by qualified renewable energy resources.

Using Ameren Missouri's projected energy level of 30,647,398,000 kWh and the total RESRAM recoveries mentioned above, the RESRAM rate is (\$0.00104), a credit to customers. The chart below illustrates this. Customers using 1,000 kWh per month will see a \$1.04 billing credit, a \$1.21/kWh decrease per month when compared to the previous period RESRAM rate of \$0.00017. Application of this rate will not exceed the annual rate cap pursuant to Section 393.1655 RSMo.

A	Total RESRAM Recoveries (TRR)	\$	(31,868,138)
B	Estimated Recovery Period Sales (kWh) (SRP)	\$	30,647,398,000
	TRR Rate (A / B)		(0.00104)

STAFF RECOMMENDATION

Staff has reviewed the revised tariff sheet as filed on September 29, 2021 and recommends the Commission issue an order either approving the tariff sheet or allowing the tariff sheet to take effect by operation of law on February 1, 2022. Staff's recommendation for approval of the RESRAM rate change in this case is solely based on the accuracy of Ameren Missouri's calculations and is not indicative of prudence.

P.S.C. MO. No. 6

4th Revised Cancelling 3rd Revised Tariff Sheet No. 93.4

Staff has verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.