

Exhibit No.:
Issues: Adjustment to FAC Rate –
Fortieth Accumulation Period
Witness: J. Neil Graser
Type of Exhibit: Direct Testimony
Sponsoring Party: Union Electric Co.
Case No.: ER-2023-_____
Date Testimony Prepared: July 29, 2022

MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

J. NEIL GRASER

St. Louis, Missouri

July, 2022

DIRECT TESTIMONY

OF

J. Neil Graser

Case No. ER-2023-_____

1 **Q: Please state your name and business address.**

2 A: My name is J. Neil Graser. My business address is One Ameren Plaza, 1901 Chouteau
3 Ave., St. Louis, Missouri.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Ameren Services Company (“Ameren Services”) as Manager, Power
6 and Fuels Accounting. Ameren Services provides various corporate support services to
7 Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”),
8 including settlement and accounting related to fuel, purchased power, and off-system sales.

9 **Q: What is the purpose of your testimony?**

10 A: My testimony supports the 1st Revised Sheet No. 71.25 of Ameren Missouri’s Schedule
11 No. 6 – Schedule of Rates for Electric Service, that is being filed by Ameren Missouri to
12 adjust customer rates for changes in Ameren Missouri’s fuel and purchased power costs,
13 net off-system sales revenues, and associated transportation (i.e., Actual Net Energy Costs,
14 or “ANEC”), which were experienced during the four-month period February 2022 through
15 May 2022.¹

¹ This four-month period is the fortieth overall Accumulation Period under Ameren Missouri’s Rider FAC, which was first approved by the Commission in Case No. ER-2008-0318, and which has subsequently been re-authorized, with certain modifications, in Case Nos. ER-2010-0036, ER-2011-0028, ER-2012-0166, ER-2014-0258, ER-2016-0179, ER-2019-0335, and ER-2021-0240.

1 **Q: Please explain why Ameren Missouri is filing a revision to its Rider FAC at this time.**

2 A: The Commission’s rule governing fuel and purchased power cost recovery mechanisms for
3 electric utilities – specifically 20 CSR 4240-20.090(8) – and Ameren Missouri’s Rider FAC,
4 require Ameren Missouri to make periodic filings to adjust customer rates for changes in
5 Ameren Missouri’s ANEC experienced during each Accumulation Period² as compared to
6 the base level of net energy costs (Factor “B” as listed in the Company’s Rider FAC tariff)
7 applicable to that same Accumulation Period. That change is to then be reflected in an
8 adjustment to the Rider FAC Fuel Adjustment Rate (i.e., Factor “FAR” in Rider FAC).
9 This adjustment can be positive (a FAR of greater than zero) or negative (a FAR of less
10 than zero). The Commission’s rule requires at least one such review and adjustment each
11 year. Ameren Missouri’s approved FAC tariff calls for three filings annually – one filing
12 covering each of the three four-month Accumulation Periods reflected in Rider FAC. The
13 changes in the FAR implemented in these three filings are then collected from or refunded
14 to customers over the applicable Recovery Period. The Recovery Period applicable to this
15 filing will consist of the calendar months of October 2022 through May 2023.

16 **Q: What adjustment is being made in this filing?**

17 A: During the February 1, 2022 to May 31, 2022 Accumulation Period, Ameren Missouri’s
18 ANEC was \$183,367,025 which was an increase of \$64,261,689 as compared to Factor B,
19 which is \$119,105,336 for that same period. The primary factors driving this increase
20 above net base energy costs (Factor B) were higher fuel costs for load and lower off-system
21 sales margins as compared to Factor B. Fuel costs increased primarily as a result of more
22 expensive fuel than what was included in the net base average. Off-system sales margins

² Capitalized terms not otherwise defined herein have the meaning given them in Rider FAC.

1 decreased primarily as a result of less generation being available for sale due to the
2 Callaway refueling outage and coal conservation stemming from delivery issues. Also
3 included in this filing is the true-up amount reflected in the Company's thirty-seventh true-
4 up filing, which is being filed concurrently with the initiation of this docket. The above
5 results in a Fuel and Purchased Power Adjustment ("FPA") of \$62,173,710 which, as
6 described further below, will produce the FAR rates that will appear as a separate line item
7 to be applied to customers' bills during the 40th Recovery Period that starts with the first
8 calendar day of October 2022.

9 **Q: Please further describe the impact of the change in the FAR on the Company's**
10 **customers.**

11 A: The \$64,261,689 increase above ANEC during the 40th Accumulation Period as compared
12 to Factor B for that Accumulation Period was calculated in the manner specified in the
13 Company's Rider FAC, and adjusted for voltage level differences, as provided for in Rider
14 FAC. Applying the 95% sharing ratio, the true-up amount of \$448,753 from the thirty-
15 seventh true-up filing (made concurrently with the initiation of this docket) and the
16 applicable recovery of interest totaling \$676,352 as provided for in Rider FAC (which
17 includes the recovery of \$68,150 in interest for Accumulation Period 40 and the recovery
18 of \$608,202 in interest for the true-up of Accumulation Period 37), the total adjustment to
19 be reflected in the FAR is \$62,173,710. That total, when using the estimated kilowatt-hour
20 ("kWh") sales for the October 2022 to May 2023 Recovery Period, results in an initial rate
21 component to be applied to the Company's Individual Service Classifications. As provided
22 for in Rider FAC, the initial rate component is subject to the Rate Adjustment Cap. Further,
23 to the extent the Large Primary Service (LPS) Classification rate exceeds the Rate

1 Adjustment Cap applicable to LPS, the shortfall is applied to the remaining Individual
2 Service Classifications to arrive at the FAR amounts that will be billed during the
3 applicable Recovery Period. There was no shortfall for Accumulation Period 40. The
4 following are the FAR amounts for the Company's customers during that Recovery Period,
5 beginning with the first calendar day of October 2022:

<u>Customer Voltage Level</u>	<u>Cents per kWh Adjustment</u>
Secondary	0.270 ¢/kWh
Primary	0.262 ¢/kWh
High Voltage	0.258 ¢/kWh
Transmission	0.254 ¢/kWh

6 Filed concurrently with my direct testimony is the tariff sheet that contains the formula that
7 Ameren Missouri used to calculate the FAR. Also included in the tariff sheet are the values
8 for each element of the formula that were used to derive the FAR. Assuming 1,036 kWh
9 of usage per month for the average residential customer, this will result in a charge under
10 the FAR of approximately \$2.80 per month. This is an increase from the FAR currently in
11 effect, which resulted in a charge for the average residential customer of approximately
12 \$0.42 per month. The primary factors driving this change in the FAR were higher fuel and
13 purchased power costs for load and less accidental outage insurance proceeds received in
14 Accumulation Period 40 as compared to Accumulation Period 38 and the net base energy
15 costs applicable to each period. Increases in the fuel and purchased power costs for load
16 during Accumulation Period 40 as compared to Accumulation Period 38 and the net base
17 energy costs applicable to each period is primarily due to the increased energy costs during
18 Accumulation Period 40.

1 **Q: Having addressed the primary factors driving ANEC for Accumulation Period 40,**
2 **can you please explain how you developed the various values used to derive the**
3 **proposed FAR shown on the tariff sheet?**

4 A: The data upon which Ameren Missouri based the values for each of the variables in the
5 approved FAR formula is shown in Schedule JG-FAR. This schedule contains all the
6 information that is required by 20 CSR 4240-20.090(8), and the work papers that support
7 the data contained in Schedule JG-FAR. I have also included Schedule JG-TU, which is a
8 reproduction of Schedule JG-TU filed in the separate true-up docket for the thirty-seventh
9 Recovery Period, which as earlier noted is being filed concurrently with the initiation of
10 this docket.

11 **Q: If the rate schedule filed by Ameren Missouri is approved or allowed to go into effect,**
12 **what safeguards exist to ensure that the revenues the Company collects do not exceed**
13 **the net energy costs that Ameren Missouri actually incurred during the Accumulation**
14 **Period?**

15 A: Ameren Missouri's Rider FAC and the Commission's rules provide two mechanisms to
16 ensure that amounts collected from customers do not exceed Ameren Missouri's actual,
17 prudently-incurred ANEC. First, Rider FAC and the Commission's rules require a true-up
18 of the amounts collected from customers through Rider FAC, with any excess/unrecovered
19 amounts to be refunded/billed to customers through prospective adjustments to the FAR
20 calculation, with interest at Ameren Missouri's short-term borrowing rate. Second, Ameren
21 Missouri's ANEC are subject to periodic prudence reviews to ensure that only prudently-
22 incurred net energy costs are collected from customers through Ameren Missouri's Rider

1 FAC. These two mechanisms serve as checks that ensure that the Company’s customers
2 pay only the prudently-incurred ANEC and no more.

3 **Q: What action is Ameren Missouri requesting from the Commission with respect to the**
4 **rate schedule that the Company has filed?**

5 A: As provided by 20 CSR 4240-20.090(8) the Commission Staff (the “Staff”) has thirty (30)
6 days from the date the revised FAC rate schedule is filed to conduct a review and to make
7 a recommendation to the Commission as to whether the rate schedule complies with the
8 Commission’s rules, the requirements of Section 386.266, RSMo (Cum. Supp. 2020), and
9 Ameren Missouri’s approved Rider FAC. If the Commission finds the revised Rider FAC
10 rate schedule does comply, the FAR will take effect either pursuant to a Commission order
11 approving the FAR or by operation of law, in either case within 60 days after the FAR is
12 filed. Because Ameren Missouri believes its filing satisfies all of the requirements of
13 applicable statutes, the Commission’s rules and Ameren Missouri’s approved Rider FAC,
14 Ameren Missouri requests that after the Staff’s review, the Commission approve the FAR
15 or otherwise allow it to take effect by operation of law to be effective on October 1, 2022.

16 **Q: Does this conclude your direct testimony?**

17 A: Yes, it does.

