

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

In the Matter of the Union Electric                    )  
Company d/b/a Ameren Missouri’s                    )     **Case No. GR-2020-0372**  
Purchased Gas Adjustment Tariff Filing            )

**STAFF RECOMMENDATION REGARDING AMEREN MISSOURI’S  
2019-2020 ACTUAL COST ADJUSTMENT FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission in the above-captioned matter and files its Actual Cost Adjustment (“ACA”) Recommendation in this case concerning Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) 2019-2020 ACA filing as set forth in the accompanying Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Ameren Missouri filed its ACA for the 2019-2020 period in this case on October 16, 2020. This filing revises the ACA rates based upon Ameren Missouri’s calculations of the ACA account balances.

2. The Commission’s Procurement Analysis Department Staff (“Staff”) has reviewed Ameren Missouri’s filing and submits its recommendation as further explained in the accompanying Staff Recommendation Memorandum, marked as Appendix A and incorporated herein by reference. Staff’s analysis consisted of a review of Ameren Missouri’s natural gas supply plans including a review of Ameren Missouri’s gas purchasing practices to evaluate the prudence of the purchasing decisions for this ACA period; a reliability analysis; and a hedging review. Staff’s analysis also included a review of Ameren Missouri’s billed revenues compared with its actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance. An over-recovery is shown as a negative ACA balance that must be returned to

customers; an under-recovery is shown as a positive ACA balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum (in “Public” and “Confidential” formats), Staff has proposed no dollar adjustments to Ameren Missouri’s ACA account balances filed on October 16, 2020. Staff recommends the Commission issue an order requiring Ameren Missouri to establish the ACA account balances to reflect the under and over-recovery balances as of August 31, 2020, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

4. Although Staff has proposed no dollar adjustments, based on its review Staff has certain comments, concerns and recommendations as set forth in the Reliability Analysis and Gas Supply Planning section and the Hedging section of the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Ameren Missouri to respond to these concerns, comments, and recommendations within thirty (30) days.

**WHEREFORE**, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Ameren Missouri to respond within thirty (30) days to Staff’s concerns, comments, and recommendations discussed in the Reliability Analysis and Gas Supply Planning section and the Hedging section of Staff’s Recommendation Memorandum, and to establish the ACA account balances to reflect the under and over-recovery balances as of August 31, 2020, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

Respectfully submitted,

**/s/ Jamie S. Myers**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 15th day of December, 2021.

**/s/ Jamie S. Myers**