

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

In the Matter of the Union Electric)
Company d/b/a Ameren Missouri's)
Purchased Gas Adjustment Tariff Filing)

File No. GR-2020-0108
Tariff No. JB-2020-0059

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

1. On October 17, 2019, Union Electric Company d/b/a Ameren Missouri (Company) filed a proposed tariff sheet bearing an effective date of November 1, 2019. This tariff sheet was filed to reflect changes in Ameren Missouri's Purchased Gas Adjustment (PGA) and Actual Cost Adjustment (ACA) factors as a result of estimated changes in the cost of natural gas.

2. In its *Order Directing Expedited Staff Recommendation And Setting Time For Responses* (Order), issued October 18, 2019, the Commission directed Staff to file a recommendation regarding the tariff sheet filed by the Company in Tariff File No. JG-2020-0059. The Order directed Staff to file its recommendation no later than October 25, 2019, and any other entity to file any comments or response no later than October 28, 2019.

3. The change in the PGA factor will decrease natural gas cost to \$0.3994/Ccf from \$0.4667/Ccf for firm sales customers. The interruptible sales customers' PGA factor will decrease to \$0.2684/Ccf from \$0.3187/Ccf. The transportation PGA factor remains unchanged at \$0.0000/Ccf. For the Company's service area, which now includes the Rolla area as a result of the last rate case, the proposed PGA factor change represents a \$0.0673/Ccf decrease from the current PGA

for firm service (residential sales customers) and a decrease of \$0.0503/Ccf for interruptible service.

4. For reasons more fully explained in Staff's Memorandum, attached hereto as Appendix A and incorporated herein, the PGA and ACA factor rate changes should be approved on an interim, subject to refund status, pending final Commission decisions in ACA Case Nos. GR-2020-0108 (2018-2019) and GR-2018-0346 (2017-2018).

WHEREFORE, for the reasons stated in Staff's Memorandum, the Staff respectfully requests that the Commission issue an order approving Ameren Missouri's tariff sheet in File No. JG-2020-0059, on an interim, subject to refund status.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 25th day of October 2019.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GR-2020-0108, Tariff No. JG-2020-0059
Union Electric Company, d/b/a Ameren Missouri

FROM: Michael J. Ensrud, Procurement Analysis

/s/ David M. Sommerer 10/25/2019
Financial and Business Analysis Division /Date

/s/ Robert S. Berlin 10/25/2019
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Union Electric Company, d/b/a Ameren Missouri
PGA Tariff Filing Effective November 1, 2019

DATE: October 25, 2019

On October 17, 2019, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), of St. Louis, Missouri, filed one (1) tariff sheet¹ bearing an effective date of November 1, 2019. The tariff sheet were filed to reflect changes in Ameren Missouri’s Purchased Gas Adjustment (PGA) factors as a result of estimated changes in the cost of natural gas. Also included in this filing is the annual change to the Actual Cost Adjustment (ACA) factors. Ameren Missouri requests the tariff sheet go into effect on November 1, 2019.

On October 18, 2019, the Commission issued “Order Directing Expedited Staff Recommendation and Setting Time for Responses”. It set out an October 25, 2019 deadline for Staff to file its recommendation.

Ameren Missouri states the following in its cover letter:

The revised sheet includes changes to Company’s Purchased Gas Adjustment (PGA) Clause as approved by the Commission. These revisions reflect an adjustment to the Regular Purchased Gas Adjustment (RPGA) factor.

The change in the PGA factor applicable to the Company’s service areas will decrease to 39.94¢/Ccf from 46.67¢/Ccf for firm sales customers. The interruptible sales customers’ PGA factor will decrease to 26.84¢/Ccf from 31.87¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

For the Company’s service area (now including the Rolla area²), the proposed PGA is a decrease from the existing PGA by \$0.0673 per Ccf for Firm Service and a decrease of \$0.0503 per Ccf for Interruptible.

¹ The “old” Rolla District no longer has its own set of PGA rates.

² The inclusion of the former Rolla District into the same PGA rates as the rest of Ameren’s Missouri operation took

These rate changes, both PGA and ACA, should be implemented on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2020-0108 and GR-2018-0346. Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2020. The ACA procedure involves review and true-up to review the actual gas costs incurred.

As of the issuance of this memo, the Company is not delinquent on its PSC assessment.

Staff has verified that Ameren Missouri has filed its annual report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing other than as set forth above.

Staff has reviewed this filing and has determined it was calculated in conformance with Ameren Missouri's PGA Clause and past PGA filings. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Ameren Missouri's Commission-approved PGA clause allowing for notice of ten (10) business days for PGA change (both increases and decreases) filings.

Therefore, Staff recommends the following tariff sheet, as filed on October 18, 2019, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2

115th Revised SHEET No. 30 Cancelling 114th Revised SHEET No. 30

