

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

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

Case No. GR-2020-0372
Tracking No. YG-2021-0098

STAFF RECOMMENDATION

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

1. On October 16, 2020, Union Electric Company d/b/a Ameren Missouri (Company) filed a proposed tariff sheet bearing an effective date of November 1, 2020. This tariff sheet was 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. The tariff sheet also reflects adjustments to the Company's Actual Cost Adjustment (ACA) factors.

2. In its *Order Directing Expedited Staff Recommendation And Setting Time For Responses* (Order), issued October 20, 2020, the Commission directed Staff to file a recommendation regarding the tariff sheet filed by the Company in tariff Tracking No. YG-2021-0098. The Order directed Staff to file its recommendation no later than October 26, 2020, and any other entity to file any comments or response no later than October 26, 2020.

3. The change in the PGA factor will increase natural gas cost to \$0.3763/Ccf from \$0.3500/Ccf for residential and general service customers (firm sales customers). The interruptible sales customers' PGA factor will increase to \$0.2740/Ccf from \$0.2510/Ccf. Transportation customers' PGA factor will remain at \$0.0000/Ccf.

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-2020-0372 (winter 2019-2020) and GR-2020-0108 (winter 2018-2019).

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 tariff Tracking No. YG-2021-0098, on an interim, subject to refund status and that the Commission order Staff to file the results of its ACA review in this case no later than December 15, 2021.

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 26th day of October, 2020.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GR-2020-0372, Tariff No. YG-2021-0098
Union Electric Company, d/b/a Ameren Missouri

FROM: Michael J. Ensrud, Procurement Analysis

/s/ David M. Sommerer 10/26/2020
Financial and Business Analysis Division /Date

/s/ Robert S. Berlin 10/26/2020
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Union Electric Company, d/b/a Ameren Missouri
PGA Tariff Filing Effective November 1, 2020

DATE: October 26, 2020

On October 16, 2020 Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), of St. Louis, Missouri, filed one (1) tariff sheet bearing an effective date of November 1, 2020. The tariff sheet was 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, 2020.

On October 20, 2020, the Commission issued “Order Directing Expedited Staff Recommendation and Setting Time for Responses”. It set out an October 26, 2020 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”) Rider 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 increase to 37.63¢/Ccf from 35.00¢/Ccf for firm sales customers. The interruptible sales customers’ PGA factor will increase to 27.40¢/Ccf from 25.10¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

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-2020-0372 and GR-2020-0108. 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, 2021. The ACA procedure involves review and true-up of 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 16, 2020, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2

117th Revised SHEET No. 30 Cancelling 116th Revised SHEET No. 30

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Purchased Gas Adjustment Tariff)	

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW Michael J. Ensrud, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Michael J. Ensrud
Michael J. Ensrud