

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Changes to Company's	)	<b><u>Case No. GR-2020-0108</u></b>
Purchased Gas Adjustment (PGA) Clause	)	

**STAFF RECOMMENDATION REGARDING AMEREN MISSOURI'S  
2018-2019 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" or "Company") 2018-2019 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 2018-2019 period in this case on October 17, 2019. This filing revises the ACA rates based upon the Company'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 the Company's gas purchasing practices to evaluate the prudence of the Company's purchasing decisions for this ACA period; a reliability analysis; and a hedging review. Staff's analysis also included a review of the Company'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 by the Company 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 the Company’s ACA account balances filed on October 17, 2019. 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, 2019, 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 forty-five (45) 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 45 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, 2019, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

Respectfully submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin

Deputy Counsel

Missouri Bar No. 51709

P. O. Box 360

Jefferson City, MO 65102

(573) 526-7779 (Telephone)

(573) 751-9285 (Fax)

Email: [bob.berlin@psc.mo.gov](mailto:bob.berlin@psc.mo.gov)

Attorney for the Staff of the

Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel for parties of record this 9<sup>th</sup> day of October, 2020.

**/s/ Robert S. Berlin**