

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

In the Matter of the Request of Union Electric)	
Company d/b/a Ameren Missouri to Implement)	<u>File No. GT-2021-0055</u>
the Delivery Charge Adjustment for the 1st)	Tariff No. YG-2021-0055
Accumulation Period beginning September 1, 2019)	
and ending August 31, 2020)	

STAFF RECOMMENDATION

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

1. On September 1, 2020, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a tariff sheet (Tariff Tracking No. YG-2021-0055) designed to implement its Delivery Charge Adjustment for the 1st Accumulation Period beginning September 1, 2019 and ending August 31, 2020. This tariff sheet has an issue date of September 1, 2020, and effective date of November 1, 2020.

2. On September 2, 2020, the Commission issued its *Order Directing Staff Recommendation and Setting Time for Intervention and Responses* (Order) ordering Staff to file a recommendation no later than September 23, 2020 regarding the tariff sheet in Tariff Tracking No. YG-2020-0055. Staff’s Recommendation, in memorandum form, is attached hereto and incorporated herein by reference.

3. As reflected in the attached Recommendation memorandum, Staff has reviewed the tariff sheet filed by Ameren Missouri on September 1, 2020 and has determined that the tariff sheet is in compliance with the Commission’s September 2, 2020 Order and the Company’s tariff. Thus, Staff recommends approval of:

WHEREFORE, as set forth in Staff's Recommendation memorandum, Staff recommends the Commission issue an order approving the tariff sheet as filed by Ameren Missouri on September 1, 2020, to go into effect for service on the requested effective date of November 1, 2020.

Respectfully submitted

/s/ Ron Irving

Ron Irving
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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 counsel of record on this 22nd day of September, 2020.

/s/ Ron Irving

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. GT-2021-0055, Tariff File No. YG-2021-0055

FROM: Sarah L.K. Lange, Regulatory Economist, Tariff & Rate Design Department

/s/ Robin Kliethermes 9/22/2020 /s/ Ron Irving 9/22/2020
Tariff & Rate Design Department/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the Approval of the Union Electric Company d/b/a Ameren Missouri to Implement the Delivery Charge Adjustment for the 1st Accumulation Period beginning September 1, 2019 and ending August 31, 2020

DATE: 9/22/2020

Procedural History

This is the first adjustment under the Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) Gas Delivery Charge Adjustment (“DCA”) Rider, promulgated at tariff sheets 31 – 31.2 at the conclusion of the most recent Ameren Missouri Gas general rate case, Case No. GR-2019-0077. This case seeks to modify Sheet 31.2, which bears the rates applicable to this rider.

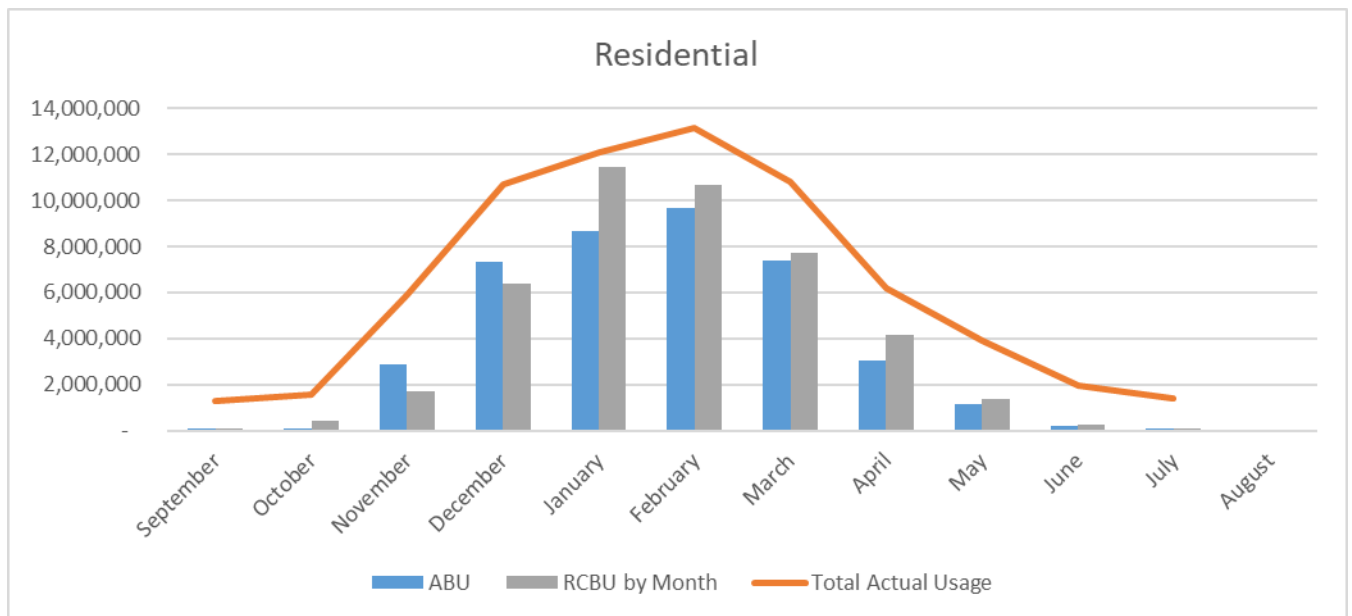
Ameren Missouri submitted one tariff sheet in Tracking No. YG-2021-0055, Schedule No. 2, 1st Revised Sheet No. 31.2, canceling Original Sheet No. 31.2 on September 1, 2020 with an effective date of November 1, 2020. Subsequent to discussions with the Tariff and Rate Design Department manager, Ameren Missouri filed the September 1, 2020 tariff submission as a GT case within EFIS, initiating this docket, Case No. GT-2021-0055.

Discussion

The rates included on the submitted tariff sheet are charges of \$0.0158/ccf for customers served on the Residential Rate Schedule, and \$0.0036/ccf for customers served on the General Service Rate Schedule.

Staff has reviewed Ameren Missouri’s provided workpapers and additional supporting documents requested from Ameren. While the annual quantity of ccf sales for each rate schedule (the RCU) and the annual quantity of ccf sales for each rate schedule subject to the DCA (the RCBU) were stipulated at the conclusion of Case No. GR-2019-0077, the monthly volumes were not included

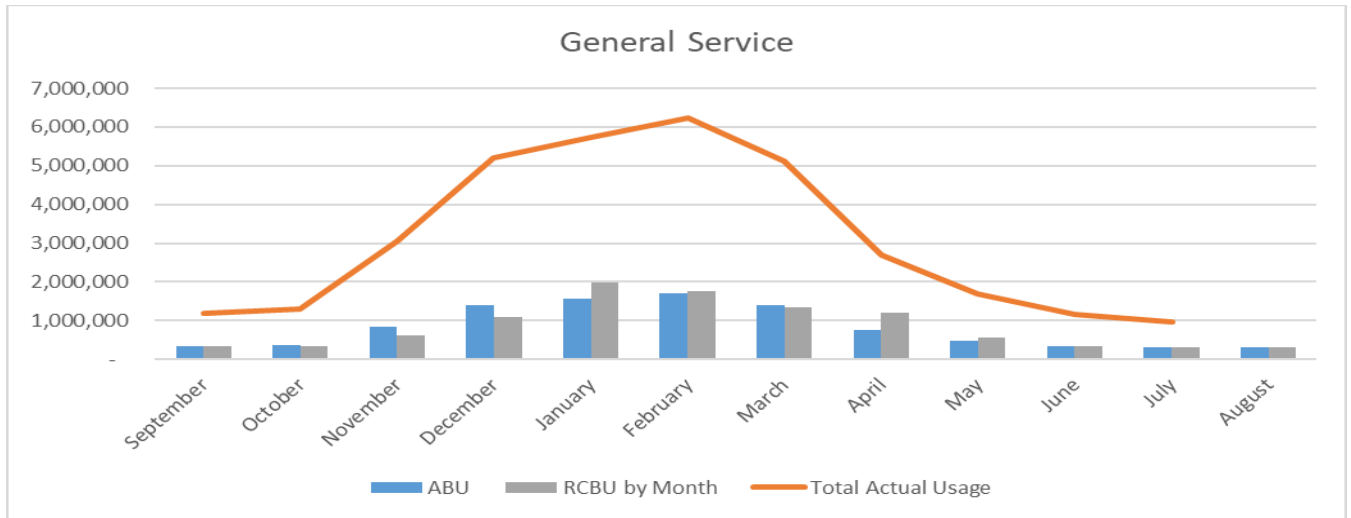
in the stipulation.¹ The volumes by revenue month are necessary for calculation of the Reconciliation Adjustment Interest. The monthly volumes used by Ameren Missouri as the allocation of the RCBU to each revenue month in this calculation are not unreasonable and should be the basis of future adjustments under this Rider until superseded by a future general rate case. A graphic comparison of the ABU,² RCBU, and the actual usage by revenue month in total for the indicated rate schedule is provided below:³



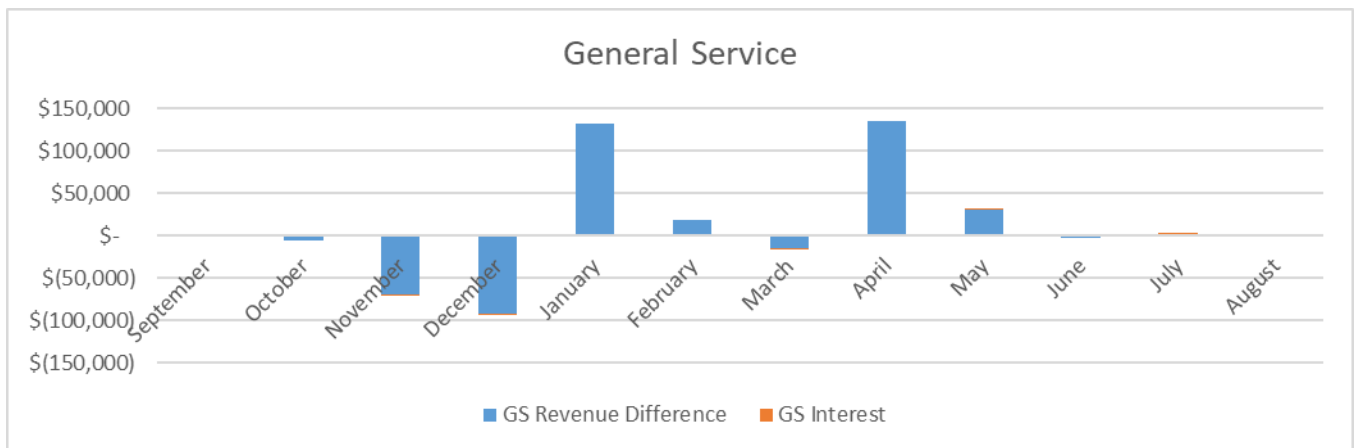
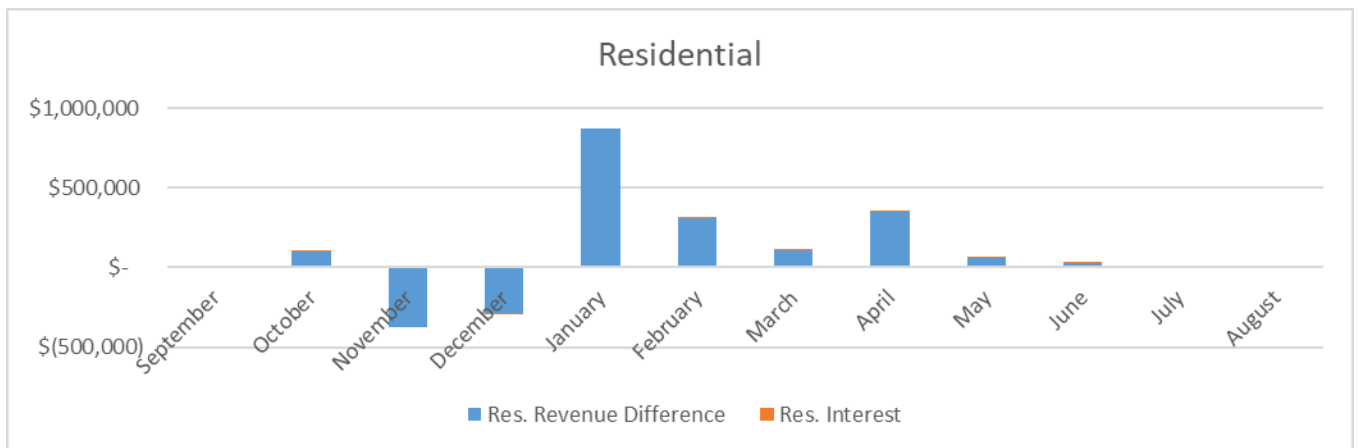
¹ Rate Case Usage (“RCU”) is the estimated total usage in ccf for the applicable class established in the most recent general rate case. Rate Case Block Usage (“RCBU”) is the normalized annual natural gas usage in Block 2 for Residential customers and Block 1b for General Service customers established in the most recent general rate case.

² Actual Block Usage, (“ABU”) is that usage which occurred during the Adjustment Period (AP) for the class's adjustable Ccf usage range.

³ For purposes of the DCA calculations, Ameren Missouri used the monthly RCU amount for August 2020 as the projection for actual usage in August 2020. This is consistent with Staff’s expectations and is necessary to facilitate timely DCA rate changes year-to-year.



The revenue difference and applicable interest, by revenue month, pursuant to the DCA formulas is provided graphically below:



Because the DCA rates in effect during the pendency of Original Sheet 31.2 were \$0.00 it is not material that Ameren Missouri removed the prior rates when promulgating this First Revised Sheet 31.2. However, Staff recommends Ameren Missouri include the prior DCA rates, with effective dates indicated, when promulgating subsequent annual revisions to Sheet 31.2.

Recommendation

Staff recommends the Commission approve this tariff sheet, Tracking No. YG-2021-0055, Schedule No. 2, 1st Revised Sheet No. 31.2, canceling Original Sheet No. 31.2 on September 1, 2020 to take effect November 1, 2020, or allow such sheet to take effect by operation of law. A residential customer using 100 ccf of natural gas each month will experience an increase of \$1.58 in their monthly bill for service.

Ameren Missouri has provided its 2019 Annual Report, and Staff is not aware of any other complaint or matter concerning this DCA rider.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of Union Electric)
Company d/b/a Ameren Missouri to)
Implement the Delivery Charge)
Adjustment for the 1st Accumulation Period)
beginning September 1, 2019 and ending)
August 31, 2020)

File No. GT-2021-0055
Tariff No. YG-2021-0055

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW SARAH L.K. LANGE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Sarah L.K. Lange
Sarah L.K. Lange