

2021-0362, the February 2021 Polar Vortex was an extraordinary event yielding increased natural gas supply and transportation costs, which costs are recovered through the Company's Rider PGA.

2. During the March 23, 2021 workshop in File No. AO-2021-0264, an Ameren Missouri representative, Timothy Eggers, explained that recovery of the increased costs from the Polar Vortex over a period of more than one year would benefit customers and the Company, and described two options to mitigate the rate impacts for customers before the Company's next annual reset of its Rider PGA rates on November 1st.¹

3. In File No. GT-2022-0031, and consistent with the description provided at the March 23, 2021 workshop in File No. AO-2021-0264, Ameren Missouri pursued one of the options to mitigate the substantial rate impacts for customers: narrow amendments of the Company's Rider PGA included in gas Tariff Sheet No. 26 to allow flexibility to extend the ACA recovery period beyond 12 months and up to 36 months. On September 1, 2021, Commission Staff filed a recommendation not opposing the requested narrow amendments to the Company's Rider PGA. The Commission thereafter issued a *Notice That Tariff Will Be Allowed To Go Into Effect* issued on September 23, 2021.

4. Ameren Missouri's currently effective gas Tariff Sheet No. 26, as revised in File No. GT-2022-0031, provides the following regarding extending the ACA recovery period beyond the normal 12 months:

However, for good cause shown that an extraordinary event has occurred, the Company may (subject to Commission approval after opportunity for comment from any party) defer recovery beyond 12 months, and up to 36 months, and the amount deferred will be added to the subsequent ACA period's cumulative ACA account balance. Amounts deferred beyond 12 months will not be included in the calculation of the current period's ACA factor described in paragraph 7 below.

¹ File No. AO-2021-0264, EFIS Item No. 8, at Slide 8.

5. Ameren Missouri requests to defer recovery of the ACA costs for the period of September 1, 2020 through August 31, 2021, which covers the extraordinary February 2021 Polar Vortex event timeframe, beyond 12 months, and to 36 months, pursuant to the afore-quoted provisions in gas Tariff Sheet No. 26.

6. The Company also seeks to show good cause that an extraordinary event has occurred to support such deferred recovery. The affidavit of Timothy L. Eggers, Manager of Gas Supply for Ameren Missouri, which is attached to this Application as Schedule 2, summarizes the extraordinary February 2021 Polar Vortex and explains there is good cause to allow deferred recovery of the subject ACA costs as requested.

7. Correspondingly, the Company asks the Commission to make a finding that Ameren Missouri has shown good cause that the February 2021 Polar Vortex was an extraordinary event to allow deferred recovery of the subject ACA costs, and for the Commission to authorize the amount deferred to be added to the subsequent ACA period's cumulative ACA account balance as described in the afore-quoted provisions in gas Tariff Sheet No. 26.

8. The Company also requests approval of the updated rates reflecting such ACA period extension as set out on updated gas Tariff Sheet No. 30 as shown in Schedule 1 and concurrently submitted as a tariff tracking matter through EFIS.

9. As the November 1st deadline for the Company's annual Rider PGA rates reset swiftly approaches and the Commission only very recently allowed the revisions to gas Tariff Sheet No. 26 being relied upon to go into effect, Ameren Missouri seeks expedited treatment under 20 CSR 4240-2.080(14).

10. This *Application* has been organized into the following sections:

I. 20 CSR 4240-2.060(1), (A) through (M) — General Application Requirements

II. 20 CSR 4240-2.080(14) — Motion for Expedited Treatment

I. 20 CSR 4240-2.060(1), (A) through (M) — General Application Requirements

Paragraph (A) – Applicant

11. The Company is a Missouri corporation doing business under the fictitious name of Ameren Missouri, organized and existing under the laws of the State of Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. The Company is a subsidiary of Ameren Corporation.

Paragraph (B) – Articles of Incorporation; Paragraph (E) – Fictitious Name; Paragraph (G) – Information Previously Submitted; Paragraph (H) – Character of Business²

12. Company previously submitted a certified copy of its Articles of Incorporation to the Commission (See Case No. EA-87-105). Company previously submitted its Fictitious Name Registrations as filed with the Missouri Secretary of State's Office in File No. EA-2019-0181. Company attaches a copy of its Certificate of Corporate Good Standing as Schedule 3 to this pleading. These documents are incorporated by reference and made a part of this *Application* for all purposes.

Paragraph I – Correspondence and Communication

13. Correspondence and Communication — Correspondence, communications, orders and decisions in regard to this *Application* should be directed to the undersigned and to:

² Paragraphs (C), (D), and (F) do not apply to Ameren Missouri.

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Paragraph (K) – Actions, Judgments, and Decisions; Paragraph (L) – Fees³

14. Ameren Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates that have occurred within three years of the date of this *Application*. By the nature of its business, the Company has, from time-to-time, pending actions in state and federal agencies and courts involving customer service or rates. Company has no annual report or assessment fees overdue to this Commission.

Paragraph (M) – Affidavit

15. An affidavit in support of this *Application* by an authorized officer, Warren T. Wood, is included as Schedule 4.

II. 20 CSR 4240-2.080(14) — Motion for Expedited Treatment

16. Ameren Missouri moves for expedited treatment of this *Application* in accordance with 20 CSR 4240-2.080(14), which states:

(14) Any request for expedited treatment shall include the words “Motion for Expedited Treatment” in the title of the pleading. The pleading shall also set out with particularity the following: (A) The date by which the party desires the commission to act; (B) The harm that will be avoided, or the benefit that will accrue, including a statement of the negative effect, or that there will be no negative effect, on the party’s customers or the general public, if the commission acts by the date desired by the party; and (C) That the pleading was filed as soon as it could have been or an explanation why it was not.

³ Paragraph (J) does not apply to Ameren Missouri.

Paragraph (A) – Action Date

17. Ameren Missouri requests a decision on this *Application* to be effective by at least October 25, 2021.

Paragraph (B) – Harm Avoided/Benefit

18. A decision on this *Application* is needed by at least October 25, 2021 so that the annual Rider PGA rates reset to be effective on November 1st may reflect the rates mitigation measure of extending the ACA recovery period beyond 12 months and to 36 months, as depicted in Schedule 1, which benefits customers. Therefore, good cause exists to approve this *Application* on an expedited basis.

19. Moreover, there will be no negative impact on customers or the general public if the Commission grants all requested relief on an expedited basis.

Paragraph (C) – As Soon As Application Could Be Filed

20. The *Application* was filed as soon as it could have been, because the revisions to the Company's gas Tariff Sheet No. 26 under which this *Application* can even seek the ACA recovery period extension relief were only very recently effective.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant the *Application*, make the requested findings of good cause, approve Schedule 1, expedite treatment of this *Application*, and grant any other relief required.

(Signature block on following page)

Respectfully submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs, MO Bar # 68970

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**ATTORNEY FOR UNION ELECTRIC
COMPANY, d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel, via electronic mail (e-mail) on this 28th day of September, 2021.

/s/ Jermaine Grubbs

Jermaine Grubbs