

Appendix 4

Issue: In the Matter of Union Electric Company d/b/a Ameren Missouri's  
Tariffs to Increase its Revenues for Natural Gas Service

Witness: Louie R. Ervin Sr.

Sponsoring Party: Missouri School Boards' Association

Case No.: GR-2019-0077

Date: May 3, 2019

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE No. GR-2019-0077**

**APPENDIX 4**

**AMEREN RESPONSES TO MSBA DR's #13 & #15**

**ON BEHALF OF**

**MISSOURI SCHOOL BOARDS' ASSOCIATION**

**Jefferson City, Missouri**

**May 3, 2019**

Ameren Missouri's  
Response to MSBA Data Request  
GR-2019-0077

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its  
Revenues for Natural Gas Service

Data Request No.: MSBA 0013

Please provide all cost support data for the "Unauthorized Gas Use Charge" in Company's Natural Gas Transportation Service rate schedule.

**RESPONSE**

<b>Prepared By: Emma Cruthis</b>
<b>Title: Manager, Gas Supply</b>
<b>Date: March 18, 2019</b>

The "Unauthorized Gas Use Charge" was designed to deter Transportation Service customers from using more than nominated (or using sales gas) during a "Critical Day". A "Critical Day" may be declared only if such conditions occur as listed on Sheet 16.2 of the Company's tariff for the integrity of the gas system to protect service for our Sales Gas Customers (mostly residential). These conditions of a "Critical Day" are typically due to constrained supply and extraordinarily high demand resulting from either extreme weather conditions, failure of the gas infrastructure, or a combination of both, consequently the price for gas supply, transportation, and storage can spike dramatically resulting in exorbitant prices in the spot market. The Company makes every effort to avoid the need to call a "Critical Day", and has not called a "Critical Day" in more than ten years. In fact, during a pipeline incident on Sunday, March 3, 2019, the Company's Gas Supply Staff worked extremely hard to secure additional supply on that Sunday to protect the integrity of the gas system to avoid calling a "Critical Day". During this time period the PEPL TX-OK spot market spiked to close to \$8/Dth. The "Unauthorized Gas Use Charges" are not revenue, but are included in the Company's PGA Clause ACA computation.

Ameren Missouri's  
Response to MSBA Data Request  
GR-2019-0077

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its  
Revenues for Natural Gas Service

Data Request No.: MSBA 0015

How many days during the test year test year, prior two years and period subsequent to the test  
year, respectively, did the company purchase gas which was not for Unauthorized Gas Use?

**RESPONSE**

<b>Prepared By: Emma Cruthis</b>
<b>Title: Manager, Gas Supply</b>
<b>Date: March 12, 2019</b>

Subject to the Company's objection, please see response to MSBA 0014 for Unauthorized  
Gas. Ameren Missouri purchases gas supply every day to meet the needs of our  
distribution system.