



mitigate the substantial rate impacts for customers: narrow amendments of the Company's Rider PGA at gas Tariff Sheet No. 26 to allow flexibility to extend the ACA recovery period beyond 12 months and up to 36 months. On September 23, 2021, the Commission issued a *Notice That Tariff Will Be Allowed To Go Into Effect*, and the revised gas Tariff Sheet No. 26 went into effect on September 25, 2021.

5. Ameren Missouri's currently effective gas Tariff Sheet No. 26, as revised through File No. GT-2022-0031, therefore provides the following regarding extending the ACA recovery period the normal beyond 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.

6. Through this affidavit, I attempt to summarize the extraordinary February 2021 Polar Vortex and explain why there is good cause to allow deferred recovery of the subject ACA costs as requested.

7. The Commission opened its investigation into the impacts of the February 2021 Polar Vortex, File No. AO-2021-0264, that same month (February of 2021), which recognized the extraordinary nature of the Event. Many other regulatory bodies, including the Federal Energy Regulatory Commission and other state utility commissions, have opened similar investigations.

8. As noted in the Commission's *Order Directing Staff to Investigate and Submit Report* effective February 24, 2021 in File No. AO-2021-0264, "[m]uch of the Midwest, including Missouri, experienced unseasonably cold temperatures in February 2021. Such temperatures resulted in rolling electrical blackouts and extreme natural gas price spikes in Missouri." *Order* at p. 1.

9. In Staff's Report in File No. AO-2021-0264, filed on April 30, 2021, Staff summarized the Event, and states at page 3: "The extreme cold temperatures, extended period of those temperatures, and precipitation contributed to what some have described as an '85 year event'." I agree — the weather was extraordinary.

10. Natural gas prices soared during the Event due to many, often-times compounding factors along the supply chain, including but not limited to: natural gas production issues due to unseasonably cold weather; the President's Day holiday on February 15<sup>th</sup> triggering gas purchase for four gas days; limited trades setting prices; lack of natural gas supply being available for purchase; transportation congestion; and electricity generation unavailability. The price volatility was extraordinary — it was unlike anything that I have seen in my more than 25 years in the natural gas industry.

11. Ameren Missouri's purchased gas costs for February 2021 were approximately \$60.6 million, while the Company's purchased gas costs for the entire calendar year 2020 were approximately \$31 million.<sup>2</sup>

12. If the ACA recovery period were not extended as sought in the *Application*, Ameren Missouri estimated that its PGA rates would more than double.<sup>3</sup>

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<sup>2</sup> File No. AO-2021-0264, EFIS Item No. 8, at Slide 5.

<sup>3</sup> File No. AO-2021-0264, EFIS Item No. 8, at Slide 7.

13. Good cause exists for the Commission to allow deferred recovery of the subject ACA costs as requested and in accordance with the process described in the Company's revised (currently effective) gas Tariff Sheet No. 26.

*/s/ Timothy Eggers* \_\_\_\_\_  
Timothy L. Eggers

This 28th day of September, 2021.