

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2018-0256
Union Electric Company d/b/a Ameren Missouri

FROM: Catherine Lucia, Utility Regulatory Auditor IV
Brooke Richter, Utility Regulatory Auditor IV
Curtis Gately, Utility Policy Analyst II
Kory Boustead, Rate and Tariff Examiner II

DATE: /s/ John Rogers 4/23/2018 /s/ Bob Berlin 4/23/2018
Energy Resources Department /Date Staff Counsel's Office /Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company
d/b/a Ameren Missouri's 24th Fuel Adjustment Clause True-up Filing Under the
Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: April 23, 2018

On March 23, 2018, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or "Company") filed with the Missouri Public Service Commission (Commission) in the form of direct testimony and supporting schedules by Marci L. Althoff, its 24th true-up filing under the provisions of its Fuel Adjustment Clause (FAC) tariff sheets, 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount without interest of (\$122,059) as identified in this filing is the result of an over-collection during Recovery Period 24 (RP24) that includes the billing months of June 1, 2017 through January 31, 2018. RP24 is the recovery period for and following Accumulation Period 24 (AP24) that includes the period of October 1, 2016 through January 31, 2017. On page 4 lines 1-8 of her Direct Testimony, Company Witness Marci L. Althoff states the following:

"There was an over-recovery of \$122,059 from customers for the 24th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be recovered for the subject Accumulation Period of \$513,255, which was calculated using the Company's short-term borrowing rate as provided for in the FAC tariff and the Commission's FAC rules, there was a total under-recovery from customers for the 24th Recovery Period of \$391,197. Schedule MA-TU to this testimony (and Attachment A to that schedule) contains details of the calculations that produce the amount to be refunded to customers."

The true-up amount¹ without interest for RP24 of (\$122,059) and the interest amount for RP24 of \$513,255 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 27 (AP27) adjustment filing, also filed on March 23, 2018, in File No. ER-2018-0255, in compliance with Ameren Missouri’s FAC.²

Staff examined the Direct Testimony of Marci L. Althoff, filed as of March 23, 2018, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly reports Ameren Missouri has submitted to the Commission. Staff also reviewed Ameren Missouri’s monthly interest calculations; Staff agrees with them.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP24 true-up filing for the billing months June 2017 through January 2018 during which Ameren Missouri (1) over-collected \$122,059 from its customers, the true-up amount for RP24, and (2) accrued interest of \$513,255.³ As stated above, this results in a total under-recovery from customers for the 24th Recovery Period of \$391,197.

Staff has verified that Ameren Missouri has filed its 2017 annual report⁴ and is not delinquent on any assessment. Ameren Missouri is current on the submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except as noted herein.

¹ See page 1 of 5 of Schedule MA-TU attached to the Direct Testimony of Marci L. Althoff for calculation of the RP24 true-up amount.

² Union Electric Company’s Schedule No. 6, Original Sheet No. 74.9 and 74.10: “TRUE-UP: After completion of each RP, the Company shall make a true-up filing on the same day as its FAR [Fuel Adjustment Rate] filing. Any true-up adjustments shall be reflected in T above. Interest on the true-up adjustment will be included in I above. The true-up adjustments shall be the difference between the revenues billed and the revenues authorized for collection during the RP.”

³ Accrued interest of \$513,255 during RP24 includes AP24 interest of \$23,269 and interest for True-Up Period 21 of \$489,986. See page 1 of 5 of Schedule MA-TU attached to the Direct Testimony of Marci L. Althoff. Note: an amount in parenthesis is a credit to the customer.

⁴ Ameren Missouri filed its 2017 Annual Report on April 13, 2018.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's) File No. ER-2018-0256
Fuel Adjustment Clause for the 24th Recovery)
Period)

AFFIDAVIT OF KORY J. BOUSTEAD

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

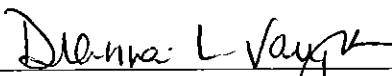
COMES NOW, Kory J. Boustead and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

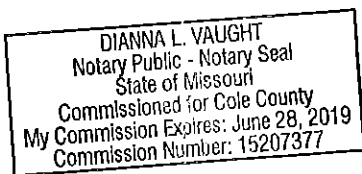


Kory J. Boustead

Subscribed and sworn to be this 23rd day of April, 2018.



Notary Public



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's) **File No. ER-2018-0256**
Fuel Adjustment Clause for the 24th Recovery)
Period)

AFFIDAVIT OF CATHERINE F. LUCIA

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

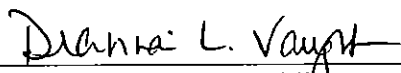
COMES NOW, Catherine F. Lucia and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



CATHERINE F. LUCIA

Subscribed and sworn to be this 23rd day of April, 2018.



Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's) **File No. ER-2018-0256**
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Period)

AFFIDAVIT OF CURT B. GATELEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

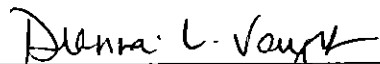
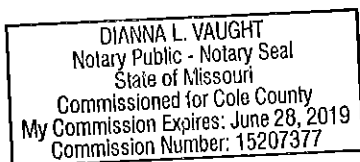
COMES NOW, Curt B. Gateley and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



Curt B. Gateley

Subscribed and sworn to be this 23rd day of April, 2018.



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
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In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's) File No. ER-2018-0256
Fuel Adjustment Clause for the 24th Recovery)
Period)

AFFIDAVIT OF BROOKE RICHTER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Brooke Richter and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

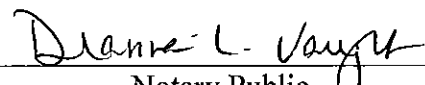
Further the Affiant sayeth not.



Brooke Richter

Subscribed and sworn to be this 23rd day of April, 2018.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377



Notary Public