

**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 Fuel )  
Adjustment Clause for the 23<sup>rd</sup> Recovery ) **Case No. ER-2018-0143**  
Period )

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR  
AMEREN MISSOURI’S FUEL ADJUSTMENT CLAUSE  
FOR THE 23<sup>rd</sup> RECOVERY PERIOD**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application for its 23<sup>rd</sup> Fuel Adjustment Clause True-Up filing on November 21, 2017. Ameren Missouri’s application would result in an adjustment to the amount collected through its fuel adjustment clause (“FAC”) due to an under-recovery. Recovery Period 23 (“RP23”) includes the billing months of February 2017 through September 2017 and followed Accumulation Period 23 that included the period of June 1, 2016, through September 30, 2016. The Commission ordered Staff to conduct a review and file its recommendation no later than December 22, 2017.

2. Commission Rule 4 CSR 240-20.090(5)(D) provides that following receipt of Staff’s recommendation, the Commission should either approve, reject or suspend the filing within 60 days or the tariff and FAC rate adjustments will take effect. Rule 4 CSR 240-3.161(8) sets forth the filing requirements for an electric utility filing a true-up related to a rate adjustment mechanism such as an FAC and 4 CSR 240-20.090(5) sets forth the requirements for submission of true-ups to remedy either over- or under-collection through rate adjustments or refunds.

3. Staff reviewed and analyzed the direct testimony and supporting schedules of Ameren Missouri witness Erik C. Wenberg. As a result of its review, Staff recommends that the Commission approve Ameren Missouri's RP23 true-up filing for the billing months of February 2017 through September 2017 during which the Company under-recovered \$972,225 from its customers for RP23 due to the difference between actual and estimated kWh sales. After applying the interest to be refunded to customers for RP23 of \$617,006, there was a total under-recovery by Ameren Missouri of \$355,219 for RP23.

4. *Staff's Memorandum*, including its recommendation, is attached to this pleading as Appendix A and contains a more detailed explanation of Staff's analyses of the Company's submitted testimony, work papers, monthly reports, and interest calculations.

5. Staff has verified that Ameren Missouri has timely filed its 2016 annual report, is not delinquent on any assessment, and is current on its Surveillance Monitoring reports.

**WHEREFORE**, Staff recommends that the Commission approve Ameren Missouri's Recovery Period 23 True-Up Filing, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully Submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin

Deputy Staff Counsel

Missouri Bar No. 51709

Attorney for the Staff of the

Missouri Public Service Commission

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 22<sup>nd</sup> day of December, 2017, to all parties of record.

**/s/ Robert S. Berlin**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. ER-2018-0143  
Union Electric Company d/b/a Ameren Missouri

FROM: Catherine F. Lucia, Utility Regulatory Auditor IV  
Brooke Richter, Utility Regulatory Auditor IV

DATE: /s/ John A. Rogers 12/22/2017                      /s/ Robert S. Berlin 12/22/17  
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 Twenty-Third Fuel Adjustment Clause True-up  
Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: December 22, 2017

On November 21, 2017, 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 Erik C. Wenberg, its twenty-third 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 \$972,225 as identified in this filing is the result of an under-collection during Recovery Period 23 ("RP23") that includes the billing months of February 2017 through September 2017. RP23 is the recovery period for and following Accumulation Period 23 ("AP23") that includes the period of June 1, 2016 through September 30, 2016. On page 4 lines 1-8 of his direct testimony, Company witness Erik C. Wenberg states the following:

There was an under-recovery of \$972,225 from customers for the 23<sup>rd</sup> Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be refunded for the subject Accumulation Period of \$617,006, 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 23<sup>rd</sup> Recovery Period of \$355,219. Schedule EW-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 amount<sup>1</sup> without interest for RP23 of \$972,225 and the interest amount for RP23 of (\$617,006) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 26 (“AP26”) adjustment filing, also filed on November 21, 2017, in File No. ER-2018-0142, in compliance with Ameren Missouri’s FAC.<sup>2</sup>

Staff examined the direct testimony of Erik C. Wenberg, filed as of November 21, 2017, 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 RP23 true-up filing for the billing months February 2017 through September 2017 during which Ameren Missouri (1) under-collected \$972,225 from its customers, the true-up amount for RP23, and (2) accrued interest of (\$617,006).<sup>3</sup>

Staff has verified that Ameren Missouri has filed its 2016 annual report<sup>4</sup> 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.

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<sup>1</sup> See page 1 of 5 of Schedule EW-TU attached to the direct testimony of Erik C. Wenberg for calculation of the RP23 true-up amount.

<sup>2</sup> 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.

<sup>3</sup> Accrued interest of (\$617,006) during RP23 includes AP23 interest of \$107,297 and interest for True-Up Period 20 of (\$724,303). See page 1 of 5 of Schedule EW-TU attached to the direct testimony of Erik C. Wenberg. Note: an amount in parenthesis is a credit to the customer.

<sup>4</sup> Ameren Missouri filed its 2016 Annual Report on April 14, 2017.

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Adjustment Clause for the 23rd Recovery )  
Period )

**AFFIDAVIT OF CATHERINE F. LUCIA**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

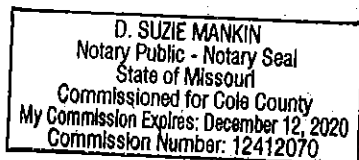
**COMES NOW CATHERINE F. LUCIA** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

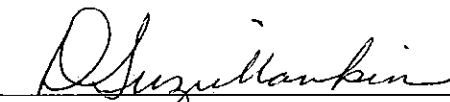
Further the Affiant sayeth not.

  
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**CATHERINE F. LUCIA**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 21<sup>st</sup> day of December 2017.



  
\_\_\_\_\_  
Notary Public

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In the Matter of the True-Up of Union Electric )  
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**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 foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

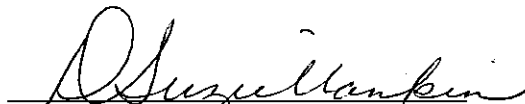
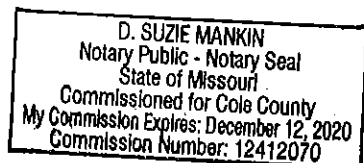
Further the Affiant sayeth not.



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**BROOKE RICHTER**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 21<sup>st</sup> day of December 2017.



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Notary Public