

**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) **Case No. ER-2019-0025**
Adjustment Clause for the 25th Recovery)
Period)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR
AMEREN MISSOURI’S FUEL ADJUSTMENT CLAUSE
FOR THE 25th 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 25th Fuel Adjustment Clause True-Up filing on July 26, 2018. Ameren Missouri’s application would result in an adjustment to the amount collected through its fuel adjustment clause (“FAC”) due to an over-recovery which is further explained in paragraph 3 below. Recovery Period 25 (“RP25”) includes the billing months of October 2017 through May 2018 and followed Accumulation Period 25 that included the period of February 1, 2017, through May 31, 2017. The Commission ordered Staff to conduct a review and file its recommendation no later than August 27, 2018.

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 Marci L. Althoff. As a result of its review, Staff recommends that the Commission approve Ameren Missouri's RP25 true-up filing for the billing months of October 2017 through May 2018 during which the Company over-recovered \$674,816 from its customers for RP25 due to the difference between actual and estimated kWh sales. After applying the interest to be recovered from customers for Accumulation Period 25 of \$466,504, there was a total over-recovery by Ameren Missouri of \$208,312 for RP25.

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 2017 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 25 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 27th day of August, 2018, to all parties of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2019-0025
Union Electric Company d/b/a Ameren Missouri

FROM: Catherine Lucia, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III

/s/ John Rogers 08/27/18
Energy Resources Department

/s/ Bob Berlin 08/27/2018
Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company d/b/a Ameren Missouri's Twenty-Fifth (25) Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: August 27, 2018

On July 26, 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 twenty-fifth (25) 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 \$(674,816) as identified in this filing is the result of an over-collection during Recovery Period 25 ("RP25") that includes the billing months of October 1, 2017 through May 30, 2018. RP25 is the recovery period for and following Accumulation Period 25 ("AP25") that includes the period of February 1, 2017 through May 31, 2018. On page 4 lines 1-8 of her direct testimony, Company Witness Marci L. Althoff states the following:

"There was an over-recovery of \$674,816 from customers for the 25th 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 \$466,504, 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 over-recovery from customers for the 25th Recovery Period of \$208,312. 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 RP25 of \$674,816 and the interest amount for RP25 of \$466,504 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 28 (“AP28”) adjustment filing, also filed on July 26, 2018, in File No. ER-2019-0024, in compliance with Ameren Missouri’s FAC.²

Staff examined the direct testimony of Marci L. Althoff, filed as of July 26, 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 RP25 true-up filing for the billing months October 2017 through May 2018 during which Ameren Missouri: (1) over-collected \$674,816 from its customers, the true-up amount for RP25, and (2) accrued interest of \$466,504.³ As stated above, this results in a total over-recovery from customers for the 25th Recovery Period of \$208,312.

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 RP25 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 \$466,504 during RP25 includes AP25 interest of (\$70,941) and interest for True-Up Period 22 of \$537,445. 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.

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Adjustment Clause for the 25th Recovery Period)
)

AFFIDAVIT OF CATHERINE F. LUCIA

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

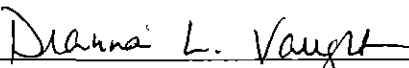
COMES NOW, Catherine F. Lucia, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



Catherine F. Lucia

Subscribed and sworn to be this 24th day of August, 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

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OF THE STATE OF MISSOURI

In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel) **File No. ER-2019-0025**
Adjustment Clause for the 25th Recovery Period)
)

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Lisa Wildhaber, 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.

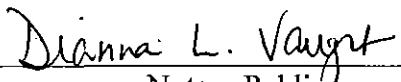
Further the Affiant sayeth not.



Lisa Wildhaber

Subscribed and sworn to be this 24th day of August, 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