

**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-2019-0153**
Adjustment Clause for the 26th Recovery)
Period)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR
AMEREN MISSOURI’S FUEL ADJUSTMENT CLAUSE
FOR THE 26th 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 26th Fuel Adjustment Clause True-Up filing on November 20, 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 26 (“RP26”) includes the billing months of February 2018 through September 2018 and followed Accumulation Period 26 that included the period of June 1, 2017, through September 30, 2017. The Commission ordered Staff to conduct a review and file its recommendation no later than December 20, 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 RP26 true-up filing for the billing months of February 2018 through September 2018 during which the Company under-recovered \$15,060 from its customers for RP26 due to the difference between actual and estimated kWh sales. After applying the interest to be recovered from customers for Accumulation Period 26 of \$449,314, there was a total over-recovery by Ameren Missouri of \$434,254 for RP26.

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 26 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 20th day of December, 2018, to all parties of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2019-0153
Union Electric Company d/b/a Ameren Missouri

FROM: Brooke Mastrogiannis, Utility Regulatory Auditor IV
Cynthia Tandy, Utility Regulatory Auditor I

/s/ John Rogers 12/20/2018 /s/ Bob Berlin 12/20/2018
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 Twenty-Sixth 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 20, 2018

On November 20, 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 26th 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 \$15,060 as identified in this filing is the result of an under-collection during Recovery Period 26 ("RP26") that includes the billing months of February 2018 through September 2018. RP26 is the recovery period for and following Accumulation Period 26 (AP26) that includes the period of June 1, 2017 through September 30, 2017. On page 4 lines 5-13 of her direct testimony, Company Witness Marci L. Althoff states the following:

"There was an under-recovery of \$15,060 from customers for the 26th 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 \$449,314, 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 26th Recovery Period of \$434,254. 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 RP26 of \$15,060 and the interest amount for RP26 of \$(449,314) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 29 (AP29) adjustment filing, also filed on November 20, 2018, in File No. ER-2019-0152, in compliance with Ameren Missouri’s FAC.²

Staff examined the direct testimony of Marci L. Althoff, filed on November 20, 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 RP26 true-up filing for the billing months February 2018 through September 2018 during which Ameren Missouri (1) under-collected \$15,060 from its customers, the true-up amount for RP26, and (2) accrued interest of \$(449,314).³ As stated above, this results in a total over-recovery from customers for the 26th Recovery Period of \$434,254.

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 RP26 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 \$(449,314) during RP26 includes AP26 interest of \$167,692 and interest for True-Up Period 23 of \$(617,006). 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

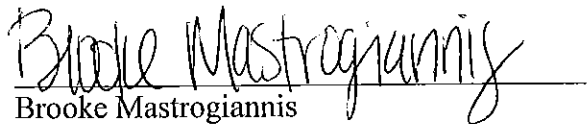
In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel) File No. ER-2019-0153
Adjustment Clause for the 26th Recovery Period)
)

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

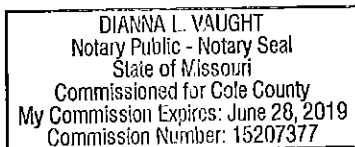
COMES NOW, Brooke Mastrogiannis, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

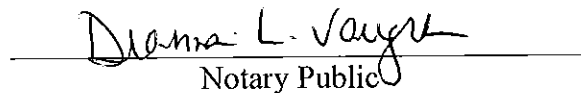
Further the Affiant sayeth not.



Brooke Mastrogiannis

Subscribed and sworn to be this 20th day of December, 2018.





Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

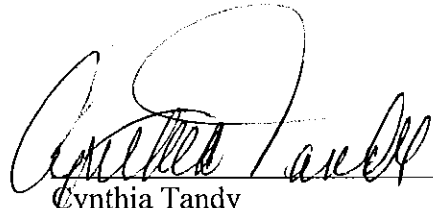
In the Matter of the True-Up of Union Electric)
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Adjustment Clause for the 26th Recovery Period)
)

AFFIDAVIT OF CYNTHIA TANDY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Cynthia Tandy, 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.

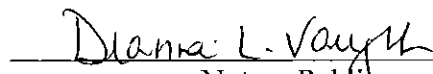
Further the Affiant sayeth not.



Cynthia Tandy

Subscribed and sworn to be this 20th day of December, 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