

**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. EO-2023-0032**  
Fuel Adjustment Clause for the 37<sup>th</sup> )  
Recovery Period. )

**STAFF RECOMMENDATION TO APPROVE**

**COMES NOW** the Staff of the Missouri Public Service Commission, through counsel, and for its recommendation states:

1. On July 29, 2022, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its tariff sheet proposing a revised fuel adjustment rate and bearing an effective date of October 1, 2022.

2. On July 29, 2022, the Commission ordered Staff to file a recommendation by August 22, 2022.

3. On August 22, 2022, Staff requested the Commission extend Staff’s deadline from August 22, 2022 to August 26, 2022. And the Commission granted Staff’s request on August 23, 2022.

4. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri’s true-up filing for the 37th Recovery Period (“RP37”) (billing months of October 2021 through May 2022), during which Ameren Missouri under-collected \$448,753. Staff’s analysis is contained in the attached Staff Memorandum.

5. The true-up amount without interest for RP37 of \$448,753 and the interest amount for RP37 of \$608,202 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 40 (“AP40”)

adjustment filing, also filed on July 29, 2022, in File No. ER-2023-0031, in compliance with Ameren Missouri's FAC.

6. Ameren Missouri is current on the submission of its Surveillance Monitoring reports, required by 20 CSR 4240-20.090(6), and its monthly reports, required by 20 CSR 4240-20.090(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. ER-2023-0031, as noted herein.

**WHEREFORE,** Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri's RP37 true-up filing for the billing months October 2021 through May 2022 during which Ameren Missouri under-collected \$448,753 from its customers for inclusion in the calculation of the FPA amount in the Company's AP40 adjustment filing in File No. ER-2023-0031.

Respectfully submitted,

**/s/ Eric Vandergriff**

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Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 26<sup>th</sup> day of August, 2022.

**/s/ Eric Vandergriff**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. EO-2023-0032  
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Utility Regulatory Auditor

DATE: /s/ Amanda C. Conner 08/26/2022      /s/ Eric Vandergriff 08/26/2022  
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 Thirty-Seventh Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: August 26, 2022

On July 29, 2022, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-seventh true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets and 20 CSR 4240-20.090(9). Ameren Missouri's filing is supported by the direct testimony and supporting schedules of J. Neil Graser, Manager of Power and Fuels Accounting at Ameren Services Company.

The true-up amount, without interest, of \$1,056,955 as identified in this filing is the result of an under-recovery during Recovery Period 37 ("RP37"). RP37 was the billing months of October 2021 through May 2022. RP37 is the recovery period for and following Accumulation Period 37 ("AP37"). AP37 was the accumulation months of February 2021 through May 2021. On page 4 lines 3 through 10 of his direct testimony, Company witness J. Neil Graser states regarding the under-recovery:

There was an under-recovery of \$448,753 from customers for the 37th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105<sup>1</sup> data. After applying the interest to be recovered for the subject Accumulation Period of \$608,202, 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 37th Recovery Period of \$1,056,955. Schedule JG-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

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<sup>1</sup> "S105" stands for 105 days after the end of the period covered by the settlement statement.

The true-up amount<sup>2</sup> without interest for RP37 of \$1,056,955<sup>3</sup> and the interest amount for RP37 of \$608,202 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 40 (“AP40”) adjustment filing, also filed on July 29, 2022, in File No. ER-2023-0031, in compliance with Ameren Missouri’s FAC.<sup>4</sup>

Staff examined Mr. Graser’s direct testimony, the supporting schedules Ameren Missouri provided with its application, and the monthly reports Ameren Missouri 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 RP37 true-up filing for the billing months of October 2021 through May 2022 as shown in the table below:

RP 37 True-Up filing	\$ 448,753
Accrued Interest	\$ 608,202
Total True-Up Amount for RP 37 (under-collected)	\$1,056,955

Staff verified that Ameren Missouri filed its 2021 annual report and is not delinquent on any assessment. Ameren Missouri is current on the submission of its Surveillance Monitoring reports, required by 20 CSR 4240-20.090(6), and its monthly reports, required by 20 CSR 4240-20.090(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. ER-2023-0031, as noted herein.

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<sup>2</sup> See tab 1 (Summary) of schedule jg-tu 37 conf attached to the direct testimony of J. Neil Graser for calculation of the RP37 true-up amount.

<sup>3</sup> This true-up amount is an under-recovery.

<sup>4</sup> Union Electric Company’s Schedule No. 6, Original Sheet No. 71.25: “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 TUP 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.”

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Electric Company d/b/a Ameren Missouri's ) File No. EO-2023-0032  
Fuel Adjustment Clause for the 37<sup>th</sup> )  
Recovery Period )

**AFFIDAVIT OF AMANDA C. CONNER**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

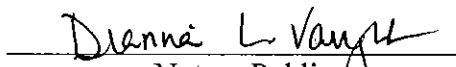
**COMES NOW AMANDA C. CONNER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
AMANDA C. CONNER

**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 24<sup>th</sup> day of August, 2022.

  
Notary Public

DIANNA L VAUGHT  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Cole County  
My Commission Expires: July 18, 2023  
Commission #: 15207377