

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2023-0340
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Utility Regulatory Auditor

/s/ Amanda C. Conner 4/28/2023
Energy Resources Department / Date

/s/ Ron Irving 4/28/2023
Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company, d/b/a Ameren Missouri's 39th Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: April 28, 2023

On March 31, 2023, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 39th 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 Raysene Logan, Manager, Power and Fuels Accounting, at Ameren Services Company.

The true-up amount, without interest, of \$(2,493,100) as identified in this filing is the result of an over-recovery during Recovery Period 39 ("RP39"). RP39 was the billing months of June 2022 through January 2023. RP39 is the recovery period for and following Accumulation Period 39 ("AP39"). AP39 was the accumulation months of October 2021 through January 2022. On page 4 lines 3 through 10 of her direct testimony, Company witness Raysene Logan states regarding the over-recovery:

There was an over-recovery of \$2,493,100 from customers for the 39th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105¹ data. After applying the interest to be recovered for the subject Accumulation Period of \$260,446, 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 39th Recovery Period of \$2,232,654. Schedule RL-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.²

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

² Company witness Raysene Logan states "the net amount to be *recovered* from customers", but Staff believes this sentence should actually state, "the net amount to be *refunded* to customers."

The true-up amount³ without interest for RP39 of \$(2,493,100)⁴ and the interest amount for RP39 of \$260,446 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 42 (“AP42”) adjustment filing, also filed on March 31, 2023, in File No. ER-2023-0338, in compliance with Ameren Missouri’s FAC.⁵

Staff examined Ms. Logan’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, other than one discrepancy noted in footnote 2.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP39 true-up filing for the billing months of June 2022 through January 2023 as shown in the table below:

RP 39 True-Up filing with interest	\$ (2,232,654)
Accrued Interest	\$ 260,446
Total True-Up Amount for RP 39 (over-collected)	\$ (2,493,100)

Staff verified that Ameren Missouri filed its 2022 annual report⁶ 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-2023-0338, as noted herein.

³ See tab 1 (Summary) of “schedule rl-tu confidential” attached to the direct testimony of Raysene Logan for calculation of the RP39 true-up amount.

⁴ This true-up amount is an over-recovery.

⁵ 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.”

⁶ Pending Staff’s initial review of the filed report.

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-2023-0340
Fuel Adjustment Clause for the 39th)
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.

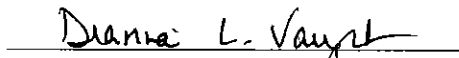
Further the Affiant sayeth not.



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 27th day of April, 2023.



Notary Public