

**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. EO-2024-0029**
Adjustment Clause for the 40th Recovery)
Period)

STAFF'S RECOMMENDATION TO AUTHORIZE TRUE-UP

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

1. On August 1, 2023, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") made its 40th fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On August 2, 2023, the Commission ordered Staff to file a recommendation by August 31, 2023.

3. Based on its examination and analysis of the information Ameren Missouri filed and submitted, Staff recommends the Commission approve Ameren Missouri's true-up filing for the 40th Recovery Period ("RP40") (billing months of October 2022 through May 2023), during which Ameren Missouri under-recovered \$5,983,471, without interest, from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The under-recovered amount of \$5,983,471, without interest, which is the true-up amount for RP40, and interest for RP40 of \$2,316,702, are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 43rd Accumulation Period ("AP43") adjustment filing, also filed on August 1, 2023, in File No. ER-2024-0028.

5. As set out in Staff's Memorandum, Company witness Raysene Logan testified as followed regarding the under-recovery:

There was an under-recovery of \$5,983,471 from customers for the 40th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data [Per the testimony "S105" stands for 105 days after the end of the period covered by the settlement statement]. After applying the interest to be recovered for the subject Accumulation Period of \$2,316,702, 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 40th Recovery Period of \$8,300,173. Schedule RL-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

6. Staff has reviewed Ms. Logan's testimony, the supporting schedules Ameren Missouri provided with its application, the monthly reports which Ameren Missouri has submitted, and Ameren Missouri's monthly interest calculations. Staff agrees with those calculations.

7. Staff has verified that Ameren Missouri filed its 2022 annual report and is not delinquent on any assessment. Ameren Missouri is current on submission of its monthly reports, required by 20 CSR 4240-20.090(5), and its surveillance monitoring reports, required by 20 CSR 4240-20.090(6). Other than as noted in the attached Staff Memorandum, Staff is not aware of any other matter before the Commission that affects or is affected by this true-up filing.

WHEREFORE, Staff recommends the Commission approve Ameren Missouri's RP40 true-up filing for the billing months of October 2022 through May 2023, during which Ameren Missouri under-recovered \$5,983,471, without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 43rd Accumulation Period of its Fuel Adjustment Clause in File No. ER-2024-0028.

Respectfully submitted,

/s/ Paul T. Graham

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on August 29, 2023, he filed the above captioned pleading in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2024-0029
Union Electric Company, d/b/a Ameren Missouri

FROM: Teresa Denney, Senior Utility Regulatory Auditor

/s/ Teresa Denney 8/31/2023
Energy Resources Department / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company, d/b/a Ameren Missouri's 40th Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: August 31, 2023

On August 1, 2023, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 40th 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 \$5,983,471 as identified in this filing is the result of an under-recovery during Recovery Period 40 ("RP40"). RP40 was the billing months of October 2022 through May 2023. RP40 is the recovery period for and following Accumulation Period 40 ("AP40"). AP40 was the accumulation months of February 2022 through May 2022. On page 4, lines 3 through 10 of her direct testimony, Company witness Raysene Logan states regarding the under-recovery:

There was an under-recovery of \$5,983,471 from customers for the 40th 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 \$2,316,702, 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 40th Recovery Period of \$8,300,173. Schedule RL-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

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

The true-up amount² without interest for RP40 of \$5,983,471³ and the interest amount for RP40 of \$2,316,702 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 43 (“AP43”) adjustment filing, also filed on August 1, 2023, in File No. ER-2024-0028, in compliance with Ameren Missouri’s FAC.⁴

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.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP40 true-up filing for the billing months of October 2022 through May 2023 as shown in the table below:

RP 40 True-Up filing with interest	\$ 8,300,173
Accrued Interest	\$ 2,316,702
Total True-Up Amount for RP 40 without interest (under-collected)	\$ 5,983,471

Staff verified that Ameren Missouri filed its 2022 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-2024-0028, as noted herein.

² See tab 1 (Summary) of “schedule rl-tu confidential” attached to the direct testimony of Raysene Logan for calculation of the RP40 true-up amount.

³ This true-up amount is an under-recovery.

⁴ 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.”

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-2024-0029
Fuel Adjustment Clause for the 40th)
Recovery Period)

AFFIDAVIT OF TERESA DENNEY

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW TERESA DENNEY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Teresa Denney
TERESA DENNEY

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 25th day of August, 2023.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaught
Notary Public

Chart 1: Ameren Missouri Fuel Adjustment Rate

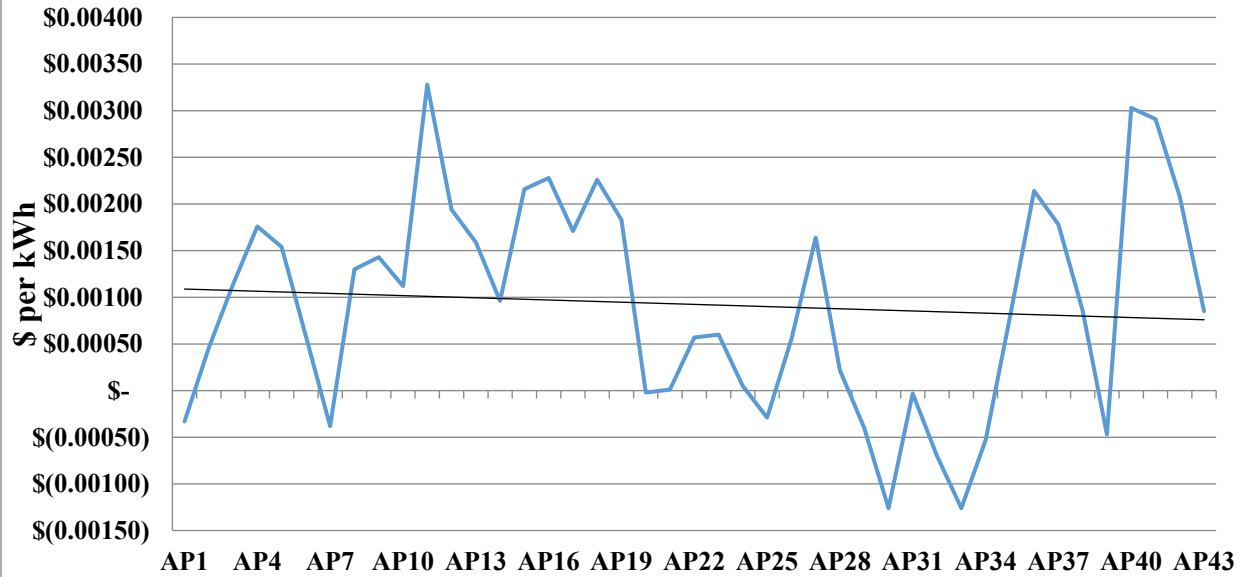


Chart 2: Ameren Missouri FAC Costs Summary

