

**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 Adjustment)	<u>File No. EO-2019-0289</u>
Adjustment Clause for the 27th Recovery Period)	Tariff No. YE-2019-0171

STAFF RECOMMENDATION

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

1. On March 25, 2019 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its twenty-seventh fuel adjustment clause true-up filing under the provisions of 4 CSR 240-20.090(9).

2. On March 26, 2019 the Commission ordered Staff to file a recommendation by April 25, 2019.

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 27th Recovery Period ("RP27") (billing months of June 2018 through January 2019), during which Ameren Missouri over-recovered \$1,673,819 from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The over-recovered amount of \$1,673,819, which is the true-up amount for RP27, and interest for RP27 are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 30th Accumulation Period ("AP30") adjustment filing, also filed on March 25, 2019, in File No. ER-2019-0287.

5. Staff verified that Ameren Missouri filed its 2018 annual report and is not delinquent on any assessment. Ameren Missouri is current on submission of its monthly

reports, required by 4 CSR 240-20.090(5), and its surveillance monitoring reports, required by 4 CSR 240-20.090(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 RP27 true-up filing for the billing months of June 2018 through January 2019, during which Ameren Missouri over-recovered \$1,673,819 from its customers, for inclusion in the calculation of the FPA amount included in Ameren Missouri's AP30 rate adjustment filing in File No. ER-2019-0287.

Respectfully Submitted,

/s/ Karen E. Bretz

Karen E. Bretz
Senior Counsel
Missouri Bar No. 70632
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5472 (Voice)
573-751-9285 (Fax)
Karen.Bretz@psc.mo.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 25th day of April, 2019.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2019-0289
Union Electric Company, d/b/a Ameren Missouri

FROM: Brooke Mastrogiannis, Utility Regulatory Auditor IV
Lisa Wildhaber, Utility Regulatory Auditor III
Cynthia M. Tandy, Utility Regulatory Auditor I

DATE: /s/ Brad J. Fortson 4/25/2019 /s/ Karen Bretz 4/25/2019
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-Seventh Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-20.090(9).

DATE: April 25, 2019

On March 25, 2019, 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 of Marci L. Althoff, its twenty-seventh true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets, and 4 CSR 240-20.090(9).

The true-up amount without interest of \$(1,673,819) as identified in this filing is the result of an over-collection during Recovery Period 27 ("RP27") that includes the billing months of June 2018 through January 2019. RP27 is the recovery period for and following Accumulation Period 27 ("AP27") that includes the period of October 1, 2017 through January 31, 2018. On page 3 line 19 through page 4 line 5 of her direct testimony, Company witness Marci L. Althoff states the following:

There was an over-recovery of \$1,673,819 from customers for the 27th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be collected for the subject Accumulation Period of \$1,199,266, 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 27th Recovery Period of \$474,553. Schedule MA-TU to this testimony contains the details of the calculation that produce the amount to be refunded to customers.

The true-up amount¹ without interest for RP27 of \$1,673,819² and the interest amount for RP27 of \$1,199,266 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 30 (“AP30”) adjustment filing, also filed on March 25, 2019, in File No. ER-2019-0287, in compliance with Ameren Missouri’s FAC.³

Staff examined the direct testimony of Company witness Marci L. Althoff, filed on March 25, 2019, 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 RP27 true-up filing for the billing months June 2018 through January 2019 during which Ameren Missouri (1) over-collected \$1,673,819 from its customers, the true-up amount for RP27, and (2) accrued interest of \$1,199,266.⁴ As stated above, this results in a total over-recovery from customers for the 27th Recovery Period of \$474,553.

Staff has verified that Ameren Missouri has filed its 2018 annual report⁵ 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(6) and its monthly reports as required by 4 CSR 240-20.090(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. EO-2019-0287 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 RP27 true-up amount.

² This true-up amount is an over-collection.

³ 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.”

⁴ Accrued interest of \$1,199,266 during RP27 includes AP27 interest of \$686,011 and interest for True-Up Period 24 of \$513,255. 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.

⁵ Ameren Missouri filed its 2018 Annual Report on April 15, 2019.

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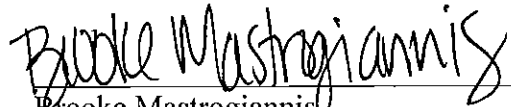
In the Matter of the True-Up of Union Electric) **File No. EO-2019-0289**
Company d/b/a Ameren Missouri's Fuel) Tracking No. YE-2019-0171
Adjustment Clause for the 27th Accumulation)
Period)

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

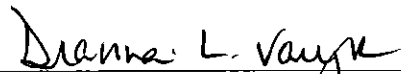
COMES NOW, Brooke Mastrogiannis, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



Brooke Mastrogiannis

Subscribed and sworn to be this 25th day of April, 2019.



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


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Period)

AFFIDAVIT OF CYNTHIA M. TANDY

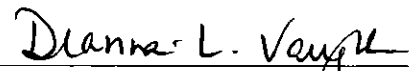
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

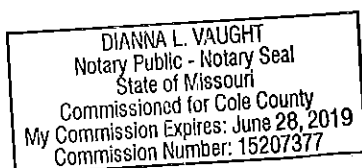
COMES NOW, Cynthia M. Tandy, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


Cynthia M. Tandy

Subscribed and sworn to be this 25th day of April, 2019.


Notary Public



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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.

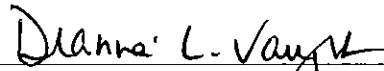
Further the Affiant sayeth not.



Lisa Wildhaber

Subscribed and sworn to be this 25th day of April, 2019.

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