

**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)	<u>File No. EO-2023-0182</u>
Adjustment Clause for the 38 th Recovery)	Tracking No. YE-2023-0096
Period)	

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

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

1. On December 2, 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 February 1, 2023.

2. On December 2, 2022, Ameren Missouri also filed its 38th true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets and 20 CSR 4240-20.090(9).

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri's true-up filing for the 38th Recovery Period ("RP38") (billing months of February 2022 through September 2022), during which Ameren Missouri over-collected \$(4,155,947). Staff's analysis is contained in the attached Staff Memorandum.

4. The true-up amount without interest for RP38 of \$(4,155,947) and the interest amount for RP38 of \$(772,840) are included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") for the Company's AP41 adjustment filing, also filed on December 2, 2022, in File No. ER-2023-0181, in compliance with Ameren Missouri's FAC.

5. Ameren Missouri filed its 2021 annual report, is not delinquent on any assessment, and is current on the submission of its Surveillance Monitoring reports, as required by 20 CSR 4240-20.090(6), and its monthly reports, as 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-2023-0181, 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 RP38 true-up filing for the billing months February 2022 through September 2022 during which Ameren Missouri over-collected \$(4,155,947) from its customers for inclusion in the calculation of the FPA amount in the Company's AP41 adjustment filing in File No. ER-2023-0181.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

573-526-6969 (Fax)

Carolyn.kerr@psc.mo.gov

Attorney for Staff of the

Missouri Public Service Commission

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 27th day of December, 2022, to all counsel of record.

/s/ Carolyn H. Kerr

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2023-0182
Union Electric Company, d/b/a Ameren Missouri

FROM: Brooke Mastrogiannis, Utility Regulatory Audit Supervisor

DATE: /s/ Brooke Mastrogiannis 12/27/2022 /s/ Carolyn Kerr 12/27/2022
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 38th Fuel Adjustment Clause True-up Filing
Under the Provisions of 20 CSR 4240-20.090(9).

DATE: December 27, 2022

On December 2, 2022, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 38th 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, Energy Analytics, at Ameren Missouri.

The true-up amount, without interest, of \$(4,155,947) as identified in this filing is the result of an over-recovery during Recovery Period 38 ("RP38"). RP38 was the billing months of February 2022 through September 2022. RP38 is the recovery period for and following Accumulation Period 38 ("AP38"). AP38 was the accumulation months of June 2021 through September 2021. On page 4 lines 1 through 8 of his direct testimony, Company witness J. Neil Graser states regarding the over-recovery:

There was an over-recovery of \$4,155,947 from customers for the 38th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105¹ data. After applying the interest to be refunded for the subject Accumulation Period of \$772,840, 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 38th Recovery Period of \$4,928,787. Schedule JG-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 J. Neil Graser 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 amount,³ without interest for RP38 of \$(4,155,947)⁴ and the interest amount for RP38 of \$(772,840), are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 41 (“AP41”) adjustment filing, also filed on December 2, 2022, in File No. ER-2023-0181, in compliance with Ameren Missouri’s FAC.⁵

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, 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 RP38 true-up filing for the billing months of February 2022 through September 2022 as shown in the table below:

RP 38 True-Up filing	\$ (4,155,947)
Accrued Interest	\$ (772,840)
Total True-Up Amount for RP 38 (over-collected)	\$ (4,928,787)

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-2023-0181, as noted herein.

³ See tab 1 (Summary) of “schedule jg-tu confidential” attached to the direct testimony of J. Neil Graser for calculation of the RP38 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.”

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)	<u>Case No. EO-2023-0182</u>
Fuel Adjustment Clause for the 38 th)	<u>Tracking No. YE-2023-0096</u>
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 foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

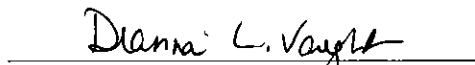
Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

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 December, 2022.

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



Notary Public