

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2022-0027
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Utility Regulatory Auditor
Brooke Mastrogiannis, Utility Regulatory Supervisor

DATE: /s/ Amanda C. Conner 9/08/2021 /s/ Casi Aslin 9/08/2021
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-Fourth Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: September 8, 2021

On July 30, 2021, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-fourth true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets and 20 CSR 4240-20.090(9). On September 8, 2021 Ameren Missouri filed a substitute tariff sheet, to change its fuel adjustment rates in its FAC filing in Case No. ER-2022-0026. This substitute filing did not affect its thirty-fourth FAC true-up filing, therefore Staff is only recommending Commission approval for the substitute FAC filing in Case No. ER-2022-0026. 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 \$775,743 as identified in this filing is the result of an under-recovery during Recovery Period 34 ("RP34"). RP34 was the billing months of October 2020 through May 2021. RP34 is the recovery period for and following Accumulation Period 34 ("AP34"). AP34 was the accumulation months of February 2020 through May 2020. On page 4 lines 3 through 8 of his direct testimony, Company Witness J. Neil Graser states regarding the under-recovery:

There was an under-recovery of \$775,743 from customers for the 34th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying interest to be recovered for the subject Accumulation Period of \$513,337, 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 34th Recovery Period of \$1,289,080.

The true-up amount¹ without interest for RP34 of \$775,743² and the interest amount for RP34 of \$513,337 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 37 (“AP37”) adjustment filing, also filed on July 30, 2021, in File No. ER-2022-0026, in compliance with Ameren Missouri’s FAC.³

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 RP34 true-up filing for the billing months October 2020 through May 2021 during which Ameren Missouri (1) under-recovered \$775,743 from its customers, the true-up amount for RP34, and (2) accrued interest of \$513,337. As stated above, this results in a total under-collected from customers for RP34 of \$1,289,080.

Staff verified that Ameren Missouri filed its 2020 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-2022-0026, as noted herein.

¹ See tab 1 (Summary) of schedule jg-tu 34 conf attached to the direct testimony of J. Neil Graser for calculation of the RP34 true-up amount.

² This true-up amount is an under-recovery.

³ Union Electric Company’s Schedule No. 6, Original Sheet No. 71.9: “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.”

