

**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. ER-2020-0303</u>
Adjustment Clause for the 30th Recovery Period)	Tariff No. YE-2020-0168

STAFF RECOMMENDATION

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

1. On March 27, 2020 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 30th fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On March 27, 2020 the Commission ordered Staff to file a recommendation by April 27, 2020.

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 30th Recovery Period ("RP30") (billing months of June 2019 through January 2020), during which Ameren Missouri over-recovered \$1,446,580 from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The over-recovered amount of \$1,446,580, which is the true-up amount for RP30, and interest for RP30 are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 33rd Accumulation Period ("AP33") adjustment filing, also filed on March 27, 2020 in File No. ER-2020-0302.

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 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 RP 30 true-up filing for the billing months of June 2019 through January 2020, during which Ameren Missouri over-recovered \$1,446,580 from its customers, for inclusion in its Fuel Adjustment Rate for the 33rd Accumulation Period of its Fuel Adjustment Clause in File No. ER-2020-0302.

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 hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 27th day of April, 2020.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2020-0303
Union Electric Company, d/b/a Ameren Missouri

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

/s/ Brad J. Fortson 04/27/2020
Energy Resources Department/Date

/s/ Karen Bretz 04/27/2020
Staff Counsel's Office/Date

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

DATE: April 27, 2020

On March 27, 2020, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirtieth 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 Marci L. Althoff, Manager of Finance Transformation at Ameren Services Company.

The true-up amount, without interest, of \$(1,446,580) as identified in this filing is the result of an over-collection during Recovery Period 30 ("RP30"). RP30 was the billing months of June 2019 through January 2020. RP30 is the recovery period for and following Accumulation Period 30 ("AP30"). AP30 was the accumulation months of October 2018 through January 2019. On page 3 line 18 through page 4 line 3 of her direct testimony, Company Witness Marci L. Althoff states regarding the over-collection:

There was an over-recovery of \$1,446,580 from customers for the 30th 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 \$546,030, 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 30th Recovery Period of \$900,550. 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 RP30 of \$(1,446,580)² and the interest amount for RP30 of \$546,030 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 33 (“AP33”) adjustment filing, also filed on March 27, 2020, in File No. ER-2020-0302, in compliance with Ameren Missouri’s FAC.³

Staff examined Ms. Althoff’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 RP30 true-up filing for the billing months October 2019 through January 2020 during which Ameren Missouri (1) over-collected \$(1,446,580) from its customers, the true-up amount for RP30, and (2) accrued interest of \$546,030. As stated above, this results in a total over-recovery from customers for RP30 of \$900,550.

Staff verified that Ameren Missouri filed its 2018 annual report⁴ 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-2020-0302, as noted herein.

¹ See tab 1 (Summary) of schedule ma-tu 30 conf attached to the direct testimony of Marci L. Althoff for calculation of the RP30 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 Ameren Missouri did file an extension for its 2019 Annual Report on March 18, 2020.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Fuel Adjustment) **File No. ER-2020-0303**
Clause for the 30th Accumulation Period) **Tariff No. YE-2020-0168**

**AFFIDAVIT OF BROOKE MASTROGIANNIS,
CYNTHIA M. TANDY, AND LISA WILDHABER**

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW Brooke Mastrogiannis, Cynthia M. Tandy, and Lisa Wildhaber and on their oath declare that they are of sound mind and lawful age; that they contributed to the foregoing Memorandum; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further your Affiants sayeth not.

/s/ Brooke Mastrogiannis
Brooke Mastrogiannis

/s/ Cynthia M. Tandy
Cynthia M. Tandy

/s/ Lisa Wildhaber
Lisa Wildhaber