

**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-2020-0020</u>
Adjustment Clause for the 28th Recovery Period)	Tariff No. YE-2020-0016

STAFF RECOMMENDATION

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

1. On July 26, 2019 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its twenty-eighth fuel adjustment clause true-up filing, which it filed under the provisions of 4 CSR 240-20.090(9).

2. On July 29, 2019 the Commission ordered Staff to file a recommendation by August 23, 2019.

3. Based on its examination and analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri's true-up filing for the 28th Recovery Period ("RP28") (billing months of October 2018 through May 2019), during which Ameren Missouri over-recovered \$553,524 from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The over-recovered amount of \$553,524, which is the true-up amount for RP28, and interest for RP28 of \$567,985 are included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 31st Accumulation Period ("AP31") adjustment filing, also filed on July 26, 2019, in File No. ER-2020-0019.

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 RP28 true-up filing for the billing months of October 2018 through May 2019, during which Ameren Missouri over-recovered \$553,524 from its customers, for inclusion in the calculation of the FPA amount included in Ameren Missouri's AP31 rate adjustment filing in File No. ER-2020-0019.

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 21st day of August, 2019.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2020-0020
Union Electric Company d/b/a Ameren Missouri

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

DATE: /s/ Brad Fortson 8/21/2019 /s/ Karen Bretz 8/21/2019
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-Eighth Fuel Adjustment
Clause True-up Filing Under the Provisions of 4 CSR 240-20.090(9).

DATE: August 21, 2019

On July 26, 2019, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its twenty-eighth true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets, and 4 CSR 240-20.090(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 \$(553,524)¹ as identified in this filing is the result of an over-collection during Recovery Period 28 ("RP28"). RP28 was the billing months of October 2018 through May 2019. RP28 is the recovery period for and following Accumulation Period 28 ("AP28"). AP28 was the accumulation months of February 2018 through May 2018. 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 \$553,524 from customers for the 28th 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 \$567,985, 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 28th Recovery Period of \$14,461. Schedule MA-TU to this testimony contains the details of the calculation that produce the amount to be refunded to customers.

¹ An amount in parenthesis is a credit to the customer.

Attachment 1

The true-up amount² without interest for RP28 of \$(553,524)³ and the interest amount for RP28 of \$567,985 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 31 (“AP31”) adjustment filing, also filed on July 26, 2019, in File No. ER-2020-0019, in compliance with Ameren Missouri’s FAC.⁴

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 RP28 true-up filing for the billing months October 2018 through May 2019 during which Ameren Missouri (1) over-collected \$553,524 from its customers, the true-up amount for RP28, and (2) accrued interest of \$567,985. As stated above, this results in a total under-recovery from customers for RP28 of \$14,461.

Staff verified that Ameren Missouri filed its 2018 annual report⁵ and is not delinquent on any assessment. Ameren Missouri is current on the submission of its Surveillance Monitoring reports, required by 4 CSR 240-20.090(6), and its monthly reports, 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. ER-2020-0019, as noted herein.

² See tab 1 (Summary) of schedule ma-tu 28 conf attached to the direct testimony of Marci L. Althoff for calculation of the RP28 true-up amount.

³ This true-up amount is an over-collection.

⁴ 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.”

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

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) Case No. ER-2020-0020
Fuel Adjustment Clause for the 28th)
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 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 22nd day of August, 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public

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 Clause for the 28th)
Recovery Period)
)

Case No. ER-2020-0020

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

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

Further the Affiant sayeth not.

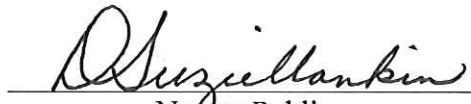


Lisa Wildhaber

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 22nd day of August, 2019.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2020 Commission Number: 12412070
--



Notary Public