

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Adjustment of Union Electric)	
Company d/b/a Ameren Missouri's RESRAM Rate)	<u>Case No. ER-2021-0090</u>
for the Second Accumulation Period)	Tariff No. YE-2021-0086

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through undersigned counsel, and submits its Staff Recommendation.

1. On September 29, 2020, Union Electric Company d/b/a Ameren Missouri filed a revised tariff sheet, substitute tariff sheet and supporting testimony to modify rates under its Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) to recover costs for the twelve-month period of August 2019 through July 2020.

2. On September 30, 2020, the Commission issued its *Order Directing Notice, Setting Intervention Deadline and Directing Staff Recommendation* ("Order"). The Order directed Staff to file a recommendation regarding its examination and analysis of Ameren Missouri's RESRAM no later than November 25, 2020.

3. Having concluded its investigation, Staff offers its *Memorandum*, filed concurrently. In summary, Staff recommends that the Commission issue an order either approving the tariff sheets or allowing the tariff sheets to take effect by operation of law of February 1, 2021.

4. The attached *Memorandum* more fully explains the circumstances and facts that led Staff to make these conclusions.

WHEREFORE, Staff hereby tenders its *Recommendation* for the Commission's information and consideration.

Respectfully Submitted,

/s/ Casi Aslin

Casi Aslin
Associate Counsel
Missouri Bar No. 67934
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-8517
casi.aslin@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 25th day of November, 2020.

/s/ Casi Aslin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2021-0090 and Tariff Tracking No. YE-2021-0086

FROM: Nancy L. Harris, Utility Regulatory Auditor

/s/ Robin Kliethermes / 11-25-2020

Regulatory Compliance Manager/ Date

/s/ Casi Aslin / 11-25-2020

Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve the Tariff Sheet Filed to Adjust the Renewable Energy Standard Rate Adjustment Mechanism of Union Electric Company, d/b/a Ameren Missouri.

DATE: November 25, 2020

BACKGROUND

On September 29, 2020, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri") filed a tariff and supporting testimony to implement a rate adjustment under its Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") for the 2nd accumulation period ending July 31, 2020 pursuant to Commission Rule 20 CSR 4240-20.100. The submitted tariff sheet bore an effective date of February 1, 2021 and was filed in Tariff Tracking No. YE-2021-0086.

On November 2, 2020, Ameren Missouri filed a substitute tariff to correct an error in the calculation of interest shown in line 3.1 of the RESRAM rate schedule. This change also affected the values on lines 3.2 and 7.

The total actual RESRAM expense for the accumulation period ending July 31, 2020 was \$4,076,407 which includes \$2,876,772 of solar rebate payments authorized under Section 393.1670. Total RES Costs Recovered for the same accumulation period were \$3,617,421. The annual RESRAM Revenue Requirement going forward is \$4,076,407. Total RESRAM Recoveries to be recovered from February 1, 2021 through July 31, 2022 are \$5,111,561 which include the going forward revenue requirement of \$4,076,407, a true-up amount of \$542,350 and an under recovery of RESRAM expenses over the accumulation period of \$492,803.

Using Ameren Missouri's projected energy level of 30,730,452,570 kWh and the total RESRAM recoveries mentioned above, the RESRAM rate is \$0.00017. Customers using 1,000 kWh per month will see a \$0.27 decrease per month when compared to the previous period RESRAM rate of \$0.00044. Application of this rate will not exceed the annual rate cap pursuant to Section 393.1655 RSMo.

STAFF RECOMMENDATION

Staff has reviewed the revised tariff sheet as filed on September 29, 2020 and as substituted on November 2, 2020, and recommends the Commission issue an order either approving the tariff sheet or allowing the tariff sheet to take effect by operation of law on February 1, 2021. Staff's recommendation for approval of the RESRAM rate change in this case is solely based on the accuracy of Ameren Missouri's calculations and is not indicative of prudence.

P.S.C. MO. No. 6
3rd Revised Cancelling 2nd Revised Tariff Sheet No. 93.4

Staff has verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Adjustment of Union)
Electric Company d/b/a Ameren Missouri's) Case No. ER-2021-0090
RESRAM Rate for the Second)
Accumulation Period)

AFFIDAVIT OF NANCY L. HARRIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW NANCY L. HARRIS 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, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Nancy L. Harris
NANCY L. HARRIS