

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

In the Matter of the True-Up of Union Electric)	<u>File No. ER-2020-0144</u>
Company d/b/a Ameren Missouri's Fuel Adjustment)	Tariff No. JE-2020-0088
Clause for the 29 th Recovery Period)	

STAFF RECOMMENDATION

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

1. On November 22, 2019 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 29th fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On November 25, 2019 the Commission ordered Staff to file a recommendation by December 20, 2019.

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 29th Recovery Period ("RP29") (billing months of February 2019 through September 2019), during which Ameren Missouri under-recovered \$107,127 from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The under-recovered amount of \$107,127, which is the true-up amount for RP29, and interest for RP29 are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 32nd Accumulation Period ("AP32") adjustment filing, also filed on November 22, 2019, in File No. ER-2020-0143.

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 29 true-up filing for the billing months of February 2019 through September 2019, during which Ameren Missouri under-recovered \$107,127 from its customers, for inclusion in its Fuel Adjustment Rate for the 32nd Accumulation Period of its Fuel Adjustment Clause in File No. ER-2020-0143.

Respectfully Submitted,

/s/ Karen E. Bretz

Karen E. Bretz
Senior Counsel
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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 20th day of December, 2019.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2020-0144
Union Electric Company d/b/a Ameren Missouri

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

DATE: /s/ Brad Fortson 12/20/2019 /s/ Karen Bretz 12/20/2019
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-Ninth Fuel Adjustment Clause
True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: December 20, 2019

On November 22, 2019, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its twenty-ninth 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 \$107,127 as identified in this filing is the result of an under-collection during Recovery Period 29 ("RP29"). RP29 was the billing months of February 2019 through September 2019. RP29 is the recovery period for and following Accumulation Period 29 ("AP29"). AP29 was the accumulation months of June 2018 through September 2018. On page 3 line 18 through page 4 line 3 of her direct testimony, Company Witness Marci L. Althoff states regarding the under-collection:

There was an under-recovery of \$107,127 from customers for the 29th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be refunded for the subject Accumulation Period of \$652,722, 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 29th Recovery Period of \$545,595. 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 RP29 of \$107,127² and the interest amount for RP29 of \$(652,722) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 32 (“AP32”) adjustment filing, also filed on November 22, 2019, in File No. ER-2020-0143, 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 RP29 true-up filing for the billing months February 2019 through September 2019 during which Ameren Missouri (1) under-collected \$107,127 from its customers, the true-up amount for RP29, and (2) accrued interest of \$(652,722). As stated above, this results in a total over-recovery from customers for RP29 of \$545,595.

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

¹ See tab 1 (Summary) of schedule ma-tu 29 conf attached to the direct testimony of Marci L. Althoff for calculation of the RP29 true-up amount.

² This true-up amount is an under-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 filed its 2018 Annual Report on April 15, 2019.

Commission that affects or is affected by this filing, except File No. ER-2020-0143, as noted herein.

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In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel)
Adjustment Clause for the 29th Recovery Period)
)
)

File No. ER-2020-0144

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

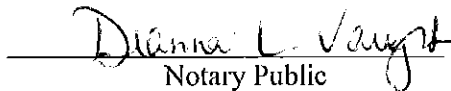
COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

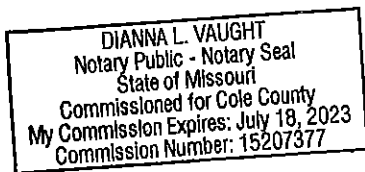
Further the Affiant sayeth not.


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 20th day of December, 2019.


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) File No. ER-2020-0144
 Adjustment Clause for the 29th Recovery Period)
)
)

AFFIDAVIT OF CYNTHIA M. TANDY

STATE OF MISSOURI)
) ss.
 COUNTY OF COLE)

COMES NOW CYNTHIA M. TANDY 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.

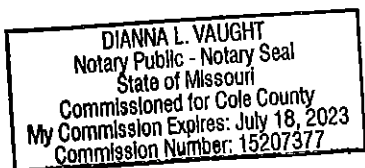
Further the Affiant sayeth not.


CYNTHIA M. TANDY

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 20th day of December, 2019.


 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 29th Recovery Period)
)
)

File No. ER-2020-0144

AFFIDAVIT OF LISA WILDHABER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

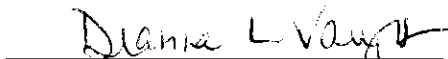
COMES NOW LISA WILDHABER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

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 20th day of December, 2019.


Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377