

**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	)	<b><u>File No. EO-2021-0329</u></b>
Adjustment Clause for the 33rd Recovery Period	)	Tariff No. YE-2021-0177

**STAFF RECOMMENDATION**

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

1. On April 1, 2021 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 33rd fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On April 1, 2021 the Commission ordered Staff to file a recommendation by May 3, 2021.

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri's true-up filing for the 33rd Recovery Period ("RP33") (billing months of June 2020 through January 2021), during which Ameren Missouri over-recovered \$(1,014,918), without interest, from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The over-recovered amount of \$(1,014,918), without interest, which is the true-up amount for RP33, and interest for RP33 of \$352,414, are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 36th Accumulation Period ("AP36") adjustment filing, also filed on April 1, 2021 in File No. ER-2021-0328.

5. While the true-up amount is an over-recovery of \$(1,014,918), once RP33 interest of \$352,414 is applied to the true-up amount, there is an over-recovery of \$(662,504), which is to be refunded to customers.

6. Staff verified that Ameren Missouri filed its 2020 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 RP33 true-up filing for the billing months of June 2020 through January 2021, during which Ameren Missouri over-recovered \$(1,014,918), without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 36th Accumulation Period of its Fuel Adjustment Clause in File No. ER-2021-0328.

Respectfully Submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record on this 3<sup>rd</sup> day of May, 2021.

**/s/ Karen Bretz**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. EO-2021-0329  
Union Electric Company d/b/a Ameren Missouri

FROM: Lisa Wildhaber, Senior Utility Regulatory Auditor  
Brooke Mastrogiannis, Utility Regulatory Supervisor

DATE: /s/ Brad Fortson 05/03/2021      /s/ Karen Bretz 05/03/2021  
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-Third Fuel Adjustment Clause  
True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: May 3, 2021

On April 1, 2021, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-third 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 J. Neil Graser, Manager of Power and Fuels Accounting at Ameren Services Company.

The true-up amount, without interest, of \$(1,014,918) as identified in this filing is the result of an over-recovery during Recovery Period 33 ("RP33"). RP33 was the billing months of June 2020 through January 2021. RP33 is the recovery period for and following Accumulation Period 33 ("AP33"). AP33 was the accumulation months of October 2019 through January 2020. On page 3 line 19 through page 4 line 4 of his direct testimony, Company Witness J. Neil Graser states regarding the over-recovery:

There was an over-recovery of \$1,014,918 from customers for the 33rd Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be recovered for the subject Accumulation Period of \$352,414, 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 33rd Recovery Period

of \$662,504. Schedule JG-TU to this testimony contains the details of the calculation that produce the net amount to be refunded to customers.

The true-up amount<sup>1</sup> without interest for RP33 of \$(1,014,918)<sup>2</sup> and the interest amount for RP33 of \$352,414 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 36 (“AP36”) adjustment filing, also filed on April 1, 2021, in File No. ER-2021-0328, in compliance with Ameren Missouri’s FAC.<sup>3</sup>

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 RP33 true-up filing for the billing months June 2020 through January 2021 during which Ameren Missouri (1) over-recovered \$(1,014,918) from its customers, the true-up amount for RP33, and (2) accrued interest of \$352,414. As stated above, this results in a total over-collected from customers for RP33 of \$(662,504).

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-2021-0328, as noted herein.

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<sup>1</sup> See tab 1 (Summary) of schedule jg-tu 33 conf attached to the direct testimony of J. Neil Graser for calculation of the RP33 true-up amount.

<sup>2</sup> This true-up amount is an over-recovery.

<sup>3</sup> 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.”

