

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

In the Matter of Union Electric)
Company d/b/a Ameren Missouri's)
Purchased Gas Adjustment Tariff)
Filing)

Case No. GR-2023-0392
Tracking No. JG-2024-0050

STAFF RECOMMENDATION

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

1. On October 17, 2023, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) filed a tariff sheet bearing an effective date of November 1, 2023, Tariff File No. JG-2024-0050, and an accompanying cover letter with supporting worksheets. The tariff sheet was filed to reflect changes in Ameren Missouri’s Purchased Gas Adjustment (“PGA”) factors as a result of estimated changes in the cost of natural gas and changes in the Actual Cost Adjustment (“ACA”) factors.

2. The Commission issued an *Order Directing Filing* (“Order”) on October 17, 2023, directing Staff to file a recommendation regarding Ameren Missouri’s request and corresponding tariff sheet, Tariff File No. JG-2024-0050, no later than October 24, 2023. The Order further states that any other entity wishing to comment on the tariff shall do so by October 24, 2023.

3. The change on the Total PGA rate applicable to Ameren Missouri’s service areas will decrease to 60.46¢/Ccf from 62.65¢/Ccf for firm sales customers. The interruptible sales customers’ PGA will increase to 46.46¢/Ccf from 36.51¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

4. Staff has reviewed Ameren Missouri's filing and determined it was calculated in conformance with Ameren Missouri's PGA Clause. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Ameren Missouri's Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings.

5. For reasons more fully explained in Staff's Memorandum, attached hereto as Appendix A and incorporated herein, the PGA and ACA rate changes should be implemented on an interim basis, subject to refund status, pending final Commission decisions in ACA Case Nos. GR-2022-0351 and GR-2023-0392.

6. Staff recommends the Commission approve the tariff sheet listed below and as in Tariff File No. JG-2024-0050, on an interim basis, subject to refund, for service on and after November 1, 2023 and as further stated in Paragraph 5.

P.S.C. MO. No. 2

123rd Revised Sheet No. 30 Cancelling 122nd Revised Sheet No. 30

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving Ameren Missouri's tariff sheet filed in Tariff File No. JG-2024-0050, on an interim basis, subject to refund status.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey
Deputy Counsel
Missouri Bar No. 59027
P.O. Box 360
Jefferson City, MO 65102
573-522-6279
573-751-9285 (Fax)
scott.stacey@psc.mo.gov

**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 23rd day of October, 2023.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. GR-2023-0392, Tariff No. JG-2024-0050
Union Electric Company, d/b/a Ameren Missouri

FROM: Michael J. Ensrud, Procurement Analysis Department

/s/ David M. Sommerer 10/23/2023
Financial and Business Analysis Division /Date

SUBJECT: Staff Recommendation for Union Electric Company, d/b/a Ameren Missouri
PGA Tariff Filing Effective November 1, 2023

DATE: October 23, 2023

On October 17, 2023, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), of St. Louis, Missouri, filed one (1) tariff sheet bearing an effective date of November 1, 2023. In addition, Ameren Missouri filed a cover letter and supporting worksheets. The tariff sheet was filed to reflect changes in Ameren Missouri’s Purchased Gas Adjustment (PGA) factors as a result of estimated changes in the cost of natural gas and changes in the Actual Cost Adjustment (ACA) factors. Ameren Missouri requests the pending tariff sheet go into effect on November 1, 2023.

On October 17, 2023, the Commission issued “Order Directing Filing” in response to Ameren Missouri’s proposed Tariff Sheet and cover letter. The order contains:

THE COMMISSION ORDERS THAT:

1. No later than October 24, 2023, Staff shall file a recommendation with regard to the above-referenced tariff.

Ameren Missouri states the following in its cover letter:

The revised sheet changes the Company’s Purchased Gas Adjustment (“PGA”) Rider, and more specifically, reflects an adjustment to the Regular Purchased Gas Adjustment (“RPGA”) factor. The change in the Total PGA rate applicable to the Company’s service areas will decrease to 60.46¢/Ccf from 62.65¢/Ccf for firm sales customers. The interruptible sales customers’ PGA will increase to 46.46¢/Ccf from 36.51¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf

These rate changes, both PGA and ACA, should be implemented on an interim, subject to refund status pending the final Commission decisions in ACA Case Nos. GR-2022-0351 and GR-2023-0392. Due to the limited time available to review the documentation supporting the ACA factor submitted in this filing, the Procurement Analysis Department requests permission to

submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2024. The ACA procedure involves review of and true-up to the actual gas costs incurred.

As of the issuance of this memo, the Company is not delinquent on its PSC assessment.

Staff has verified that Ameren Missouri has filed its annual report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing other than as set forth above.

Staff has reviewed this filing and has determined it was calculated in conformance with Ameren Missouri's PGA Clause. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Ameren Missouri's Commission-approved PGA clause allowing for notice of ten (10) business days for PGA change (both increases and decreases) filings.

In Case No. GR-2021-0291, the Commission accepted a 36 month amortization of extraordinary costs attributable to the 2021 "Storm Uri". The current filing contains the final year of the three year amortization of Storm Uri costs.

Therefore, Staff recommends the following tariff sheet, as filed on October 17, 2023, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2

123rd Revised SHEET No. 30 Cancelling 122nd Revised SHEET No. 30

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Purchased Gas) File No. GR-2023-0392
Adjustment Tariff Filing)

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL J. ENSRUD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MICHAEL J. ENSRUD

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 19th day of October 2023.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070


Notary Public