

**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)	<u>File No. EO-2024-0185</u>
Adjustment Clause for the 41 st Recovery Period)	Tariff No. JE-2024-0084

STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING

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

1. On December 1, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its 41st fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On December 4, 2023, the Commission ordered Staff to file a recommendation by December 29, 2023.

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri’s true-up filing for its 41st Recovery Period (“RP41”) (billing months of February 2023 through September 2023), during which Ameren Missouri over-recovered (\$620,571), without interest, from its customers. Staff’s analysis is contained in the attached *Memorandum*, attached hereto and incorporated herein as **Appendix A**.

4. The over-recovered amount of (\$620,571), without interest, which is the true-up amount for RP41, and interest to be recovered for RP41 of \$1,748,637, are both included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in Ameren Missouri’s 44th Accumulation Period (“AP44”) adjustment filing, also filed on December 1, 2023, in File No. ER-2024-0183.

5. While the true-up amount is an over-recovery of (\$620,571), once RP41 interest of \$1,748,637 is applied to the true-up amount, there is an under-recovery of \$1,128,066, which is to be recovered from customers.

6. Staff verified that Ameren Missouri filed its 2022 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 RP41 true-up filing for the billing months of February 2023 through September 2023, during which Ameren Missouri over-recovered (\$620,571), without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 44th Accumulation Period of its Fuel Adjustment Clause in File No. ER-2024-0183.

Respectfully submitted,

/s/ Carolyn H. Kerr

Carolyn H. Kerr

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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 28th day of December, 2023.

/s/ Carolyn H. Kerr

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2024-0185
Union Electric Company, d/b/a Ameren Missouri

FROM: Cynthia M. Tandy, Lead Senior Utility Regulatory Auditor

DATE: /s/ Cynthia M. Tandy 12/28/2023
Energy Resources Department / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company, d/b/a Ameren Missouri's 41st Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: December 28, 2023

On December 1, 2023, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 41st 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 Raysene Logan, Manager, Power and Fuels Accounting, at Ameren Services Company.

The true-up amount, without interest, of \$(620,571) as identified in this filing is the result of an over-recovery during Recovery Period 41 ("RP41"). RP41 was the billing months of February 2023 through September 2023. RP41 is the recovery period for and following Accumulation Period 41 ("AP41"). AP41 was the accumulation months of June 2022 through September 2022. On page 4, lines 1 through 8 of her direct testimony, Company witness Raysene Logan states as follows regarding the over-recovery:

There was an over-recovery of \$620,571 from customers for the 41st Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105¹ data. After applying the interest to be recovered for the subject Accumulation Period of \$1,748,637, 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 41st Recovery Period of \$1,128,066. Schedule RL-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

¹ "S105" stands for 105 days after the end of the period covered by the settlement statement.

The true-up amount² without interest for RP41 of \$(620,571)³ and the interest amount for RP41 of \$1,748,637 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 44 (“AP44”) adjustment filing, also filed on December 1, 2023, in File No. ER-2024-0183, in compliance with Ameren Missouri’s FAC.⁴

Staff examined Ms. Logan’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 the Company’s filings.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP41 true-up filing for the billing months of February 2023 through September 2023 as shown in the table below:

RP 41 True-Up filing with interest	\$ 1,128,066
Accrued Interest	\$ 1,748,637
Total True-Up Amount for RP 41 without interest (over-collected)	\$ (620,571)

Staff verified that Ameren Missouri filed its 2022 annual report and is not delinquent on any assessment. Ameren Missouri is current on the submission of its Surveillance Monitoring reports, as required by 20 CSR 4240-20.090(6), and its monthly reports, as 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-2024-0183, as noted herein.

² See tab 1 (Summary) of “schedule rl-tu confidential” attached to the direct testimony of Raysene Logan for calculation of the RP41 true-up amount.

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

⁴ Union Electric Company’s Schedule No. 6, 1st Revised Sheet No. 71.26: “**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.”

