

**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-2022-0351**

**STAFF’S REPLY AND RECOMMENDATION APPROVING UNION ELECTRIC D/B/A  
AMEREN MISSOURI’S 2021-2022 ACTUAL COST ADJUSTMENT BALANCES**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, hereby submits Staff’s Reply and Recommendation Approving Union Electric d/b/a Ameren Missouri’s (“Ameren Missouri”) 2021-2022 Actual Cost Adjustment (“ACA”) balances, and further states as follows:

1. On December 12, 2023, Staff filed its recommendation regarding Ameren Missouri’s ACA filing.

2. On January 17, 2024, Ameren Missouri filed a request to extend the time for it to respond to Staff’s recommendation and the Commission granted said request on the same date. The Commission ordered Ameren Missouri to file its response to Staff’s recommendation no later than March 15, 2024, and any reply to Ameren’s response must be filed no later than March 28, 2024.

3. Staff has reviewed Ameren Missouri’s *Response to Staff Recommendation* that was filed on March 15, 2024. Ameren Missouri states it accounts for billed and unbilled revenue in accordance with generally accepted accounting principles (“GAAP”) and the Federal Energy Regulatory Commission (“FERC”), its implementation of cycle billing is consistent with industry standards, and that no further action is needed.

4. Staff believes the addition of any number of days to the meter read date for the purpose of determining the “*intended*” revenue month may not be consistent with

both GAAP accounting and cycle billing’s definition of billed revenues. Further, it is Staff’s understanding that the addition of six days to the meter read date for the purpose of creating the meter read and billing schedule is an ongoing, manual process and manual input to the billing system that may not require modification of any system, just the manual inputs, and could cost substantially less than tens of millions of dollars. However, due to the limited time to resolve these questions, Staff proposes accepting Ameren Missouri’s ending ACA balances, as filed by Ameren Missouri, to allow Staff to continue work to resolve these questions through the audit of the 2022-2023 ACA case.

5. Staff recommends the ending balance for Ameren Missouri’s 2021-2022

Actual Cost Adjustment is established as provided in the table below:

ACA Balance as of August 31, 2022				
Class	Balance per Filing	Staff Adjustments	Staff Recommended Balance	
Firm Sales	\$ 34,795,463.66	\$ -	\$ 34,795,463.66	
Interruptible Sales	\$ 379,724.01	\$ -	\$ 379,724.01	

6. Staff recommends Ameren Missouri to continue to work with Staff to provide support for their position on revenue related issues through responding to data requests, ensuring access to external audit work papers, and validation of estimates for upgrades to the billing system.

7. Staff also made non-monetary recommendations concerning Ameren Missouri’s Reliability Analysis and Gas Supply, recognize the Commission approved effective date for the PGA rate or published date for other index rates used in cash out calculations, and hedging practices.

8. Ameren Missouri states it will continue to evaluate its capacity needs for the Rolla and Columbia regions, will recognize the effective date of PGA rates

(and other index rates) as the date they are approved by the Commission, and will continue to evaluate its hedging strategies in response to changing market dynamics as to how much the existing hedging strategy actually benefits its customers while balancing market price risk.

9. There are no remaining issues that may require a procedural schedule and such matter can be closed upon an Order approving Ameren Missouri's 2021-2022 final ACA balances addressed in paragraph 5 above.

**WHEREFORE**, Staff submits its Staff Reply and Recommendation to Approve ACA Balances, and for the reasons stated above Staff respectfully recommends the Commission issue an order approving Ameren Missouri's ACA balances as set forth in paragraph 5 above; close this case file; and any other relief as is just and reasonable under the circumstances.

Respectfully submitted,

**/s/ J. Scott Stacey**

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**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 27<sup>th</sup> day of March, 2024.

**/s/ J. Scott Stacey**