

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

In the Matter of the Adjustment of Union Electric Company)
d/b/a Ameren Missouri’s Fuel Adjustment Clause for the) **File No. ER-2025-0041**
Fuel Adjustment Clause for the 46th Accumulation Period) **Tariff No. JE-2025-0014**

STAFF TARIFF SHEET RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its Staff Recommendation for Approval of Tariff Sheet respectfully states:

1. On August 1, 2024,¹ Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company) filed one tariff sheet in ER-2025-0041 revising its Fuel Adjustment Rates (“FARs”) of its Fuel Adjustment Clause (“FAC”) for Accumulation Period 46 (“AP46”), when ended on May 31, 2024. The tariff sheet bore an issue date of August 1 and an effective date of October 1. The tariff sheet includes the amounts to be trued-up for the 43rd recovery Period under the Company’s rider FAC. The tariff sheet is identified as:

MO.P.S.C. Schedule NO. 6	4th Revised	Sheet No. 71.32
Cancelling MO.P.S.C. Schedule 6	3rd Revised	Sheet No. 71.32

2. Concurrently on August 1, the Company filed the testimony of Raysene Logan together with her work papers. Her testimony was tendered to support Ameren Missouri’s calculation of its Fuel and Purchased Power Adjustment (“FPA”). Its purpose was to identify the calculated difference between Actual Net Energy Costs (Factor “ANEC” in Rider FAC) and Net Base Energy Costs (Factor “B” in Rider FAC), Interest (Factor “I” in Rider FAC), prudence disallowance amounts (Factor “P” in Rider FAC), and true-up amounts (Factor “TUP” in Rider FAC) that were

¹ Unless otherwise indicated, all date references will be to 2024.

over- or under-recovered from customers during the forty-third Recovery Period prescribed by the FAC.

3. The Commission ordered Staff to examine and analyze the Company's filings in this case, and file its recommendation regarding its examination and analysis of Ameren Missouri's tariff filing no later than August 30, 2024.

4. Staff's Memorandum, attached hereto as Appendix A and incorporated by reference, recommends the Commission issue an order approving the revised tariff sheet taking effect on October 1, 2024.

5. Commission Rule 20 CSR 4240-20.090(8) states: "An electric utility that has a FAC shall file proposed tariff sheet(s) to adjust its FARs following each accumulation period." The rule requires Staff to "determine if the proposed adjustment to the FARs is in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established, continued, or modified in the utility's most recent general rate proceeding."

6. If so, "Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either (1) Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs; (2) Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or..." the commission may reject the proposed rate sheets, suspend the timeline, set a prehearing date, and order the parties to propose a procedural schedule.

7. The FPA amount, subject to prudence review, is \$(1,288,111), for AP46, which ended on May 31, 2024. Ameren Missouri's work papers and 4th revised Sheet No. 71.32, show the FPA Amount of \$(1,288,111) to be the sum of:

a. Fuel and purchased power amount to be recovered from customers for AP46 of \$630,906² (line 4 on proposed 4th Revised Sheet No. 71.32); plus,

b. Interest of \$3,097,648, which is \$46,905 for AP46 plus \$3,050,743 for Recovery Period 43 ("RP43") (line 4.1 of proposed 4th Revised Sheet No. 71.32); plus,

c. The true-up amount, without interest, of \$(5,016,665) (line 4.2 of proposed 4th Revised Sheet No. 71.32). This amount is pending Commission approval in File No. EO-2025-0042.

8. The proposed FAR of \$(0.00006) per kWh is equal to the FPA Amount of \$(1,288,111), divided by the Estimated Recovery Period Sales of 20,475,587,681 kWh, according to Ameren Missouri's commercial pricing node. FAR will apply during Recovery Period 46 which is Ameren Missouri's billing months of October 2024 through May 2025.

9. Staff's memo explains the calculation of the FPA amount; the calculation of FAR; the calculation of FAR without voltage level adjustments; and voltage level FARs. The memo sets out the following information in tables: the AP FARs; the proposed AP46 FARs, the current AP 45 FARs, and the difference between them for each service level: secondary, primary, high voltage, and transmission. After reviewing the tariff and

² Fuel and purchased power amount to be recovered from customers for AP46 is equal to 95% of \$664,112 (the difference between ANEC and B during AP46).

work papers, Staff has concluded that based on a monthly usage of 1,000 kWh, the proposed change to the Secondary FAR would decrease the FAC of an Ameren Missouri residential customer's monthly bill by \$1.71, from \$4.00 to \$2.29 per month.

10. After reviewing the Company's filings, including the testimony of Raysene Logan, Staff has verified that the actual fuel and purchased power costs and emissions costs, net of off-system sales revenues, match the fuel and purchased power costs and emission costs, net of off-system sales revenues, on line 1 of Ameren Missouri's proposed 4th Revised Sheet No. 71.32, and Ms. Logan's supporting schedules (along with revised work papers). Staff reviewed Ameren Missouri's monthly reports and verified that the kWh billed, as shown on the monthly reports, matches the accumulation period sales used to calculate the Net Base Energy Cost. Staff reviewed Ameren Missouri's monthly interest rates that are applied to 95% of the over/under Net Base Energy Cost amount and verified that the monthly interest rates and calculations of monthly interest amounts are correct for AP46.

11. Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2023 Annual Report. Ameren Missouri is current on its 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. EO-2025-0042, as noted herein.

12. Therefore, Staff recommends the Commission issue an order approving the following proposed tariff sheet, as filed on August 1, 2024, to become effective on October 1, 2024, subject to true-up and prudence reviews:

MO.P.S.C. Schedule No. 6

4th Revised Sheet No. 71.32, Cancelling 3rd Revised Sheet No. 71.32.

Respectively Submitted,

/s/ Paul T. Graham

Paul T. Graham #30416

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 29th day of August, 2024.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2025-0041, Tariff Tracking No. JE-2025-0014
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Senior Utility Regulatory Auditor

DATE: /s/ Amanda C. Conner 08/29/2024
Energy Resources Department/Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates Related to Ameren Missouri’s Fuel Adjustment Clause for the 46th Accumulation Period

DATE: August 29, 2024

On August 1, 2024, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed one tariff sheet, MO.P.S.C. Schedule No. 6, 4th Revised Sheet No. 71.32, bearing a proposed effective date October 1, 2024, and cancelling the MO.P.S.C. Schedule No. 6, 3rd Revised Sheet No. 71.32. The 4th Revised Sheet No. 71.32 revises Ameren Missouri’s Fuel Adjustment Rates (“FARs”) of its Fuel Adjustment Clause (“FAC”) for Accumulation Period 46 (“AP46”), which ended on May 31, 2024. Staff recommends that the Missouri Public Service Commission (“Commission”) approve MO.P.S.C. Schedule No. 6, 4th Revised Sheet No. 71.32.

Ameren Missouri’s August 1, 2024, filing includes the testimony of Raysene Logan, Manager, Power and Fuels Accounting, at Ameren Services Company, and associated work papers. The testimony and work papers include information and data that supports Ameren Missouri’s calculation of its Fuel and Purchased Power Adjustment (“FPA”). That dollar amount (“FPA Amount”) is \$(1,288,111) and is reflected on line 5 of 4th Revised Sheet No. 71.32. This FPA Amount results in a FAR₄₆¹ of \$(0.00006) per kWh, which, when added to the FAR₄₅² of

¹ FAR_{RP} is defined in 1st Revised Sheet No. 71.24 as “FAR Recovery Period rate component calculated to recover under- or over-collection during the Accumulation Period that ended immediately prior to the applicable filing.” Since this filing followed Accumulation Period 46, FAR_{RP} in this recommendation is referred to as FAR₄₆.

² FAR_(RP-1) is defined in 1st Revised Sheet No. 71.24 as “FAR Recovery Period rate component for the under- or over-collection during the Accumulation Period immediately preceding the Accumulation Period that ended immediately prior to the application filing for FAR_(RP).” Since this filing followed Accumulation Period 46, FAR_(RP-1) in this recommendation is referred to as FAR₄₅.

\$0.00224 per kWh, results in a proposed FAR³ of \$0.00217 per kWh. The proposed AP46 FAR of \$0.00217 per kWh on line 11⁴ of 4th Revised Sheet No. 71.32, is \$0.00163 per kWh less than the AP45 FAR of \$0.00380 per kWh on line 11 of the 3rd Revised Sheet No. 71.32.

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri’s work papers for AP46 show the following:

Actual Net Energy Costs (“ANEC”) ⁵	\$126,170,440
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The Net Base Energy Costs calculation is shown below as Sales multiplied by the Base Factor:

Sales in kWh	9,450,777,703
Base Factor (“BF”) per kWh	\$0.01328
Net Base Energy Costs (“B”) ⁶	\$125,506,328

The total Company Fuel and Purchased Power Difference calculation is shown below as B subtracted from ANEC:

ANEC	\$126,170,440
B	\$125,506,328
Fuel and Purchased Power Difference	\$664,112

³ FAR is defined in 1st Revised Sheet No. 71.24 as “Fuel Adjustment Rate applied to retail customer usage on a per kWh basis starting with the applicable Recovery Period following the FAR filing.” Therefore, $FAR = FAR_{(RP)} + FAR_{(RP-1)}$.

⁴ Since the Preliminary Fuel Adjustment Rate (“PFAR”) on line 9 did not change after the PISA calculations Rate Adjustment Cap (“RAC”) on Line 10, line 9 is carried to line 11.

⁵ ANEC = fuel costs (FC), plus purchased power costs (PP), plus net emission allowances (E), plus or minus net insurance recoveries (R), minus off-system sales revenues (OSSR), as reflected on line 1 of 4th Revised Sheet No. 71.32.

⁶ B = Base Factor multiplied by the accumulation period sales as reflected on lines 2, 2.1, and 2.2 of 4th Revised Sheet No. 71.32.

Calculation of FPA Amount

Ameren Missouri’s work papers and 4th Revised Sheet No. 71.32, show the FPA Amount⁷ of \$(1,288,111) to be the sum of:

1. Fuel and purchased power amount to be recovered from customers for AP46 of \$630,906⁸ (line 4 on proposed 4th Revised Sheet No. 71.32); plus,
2. Interest of \$3,097,648, which is \$46,905 for AP46 plus \$3,050,743 for Recovery Period 43 (“RP43”) (line 4.1 of proposed 4th Revised Sheet No. 71.32); plus,
3. The true-up amount, without interest, of \$(5,016,665) (line 4.2 of proposed 4th Revised Sheet No. 71.32). This amount is pending Commission approval in File No. EO-2025-0042.

Calculation of FAR₄₅

The calculated FAR₄₆ of \$(0.00006) per kWh is equal to the FPA Amount of \$(1,288,111), divided by the Estimated Recovery Period Sales of 20,475,587,681 kWh, according to Ameren Missouri’s commercial pricing node.⁹ FAR₄₆ will apply during Recovery Period 46 (“RP46”), which is Ameren Missouri’s billing months of October 2024 through May 2025.

Calculation of FAR Without Voltage Level Adjustments

Line 9 of Ameren Missouri’s proposed 4th Revised Sheet No. 71.32, reflects a FAR of \$0.00217 per kWh which is the sum of: (1) FAR₄₆ of \$(0.00006) per kWh and (2) FAR₄₅ of \$0.00224 per kWh.

	Proposed AP46 FAR 4th Revised Sheet No. 71.32	Current AP45 FAR 3rd Revised Sheet No. 71.32
Line 7. Current Period Fuel Adjustment Rate (FAR _{RP})	\$(0.00006)/kWh	\$0.00224/kWh
Line 8. Prior Period Fuel Adjustment Rate (FAR _{RP-1})	\$0.00224/kWh	\$0.00156/kWh
Line 9. Fuel Adjustment Rate (FAR)	\$0.00217/kWh	\$0.00380/kWh

⁷ 4th Revised Sheet No. 71.32, lines 1 through 5 include the complete calculation of the FPA Amount of \$(1,288,111).

⁸ Fuel and purchased power amount to be recovered from customers for AP46 is equal to 95% of \$664,112 (the difference between ANEC and B during AP46).

⁹ Midcontinent Independent System Operator, Inc.’s, (“MISO’s”) Market Settlements Business Settlements Practice Manual, BPM-005 Effective Date: September 16, 2023. The Commercial Pricing Node (“CPNode”) represents the next hierarchical level in the Commercial Model and consists of one or more Elemental Pricing Node (“EPNodes”) (electrical locations). All energy transactions, both physical and financial, are financially settled at the CPNode level. Operating Reserve supply is financially settled at the Resource CPNode level based on the appropriate CPNode MCPs. All Market Settlement activity is performed at a CPNode and is the level where locational marginal prices (“LMPs”) and market clearing prices (“MCPs”) are publicly available.

Voltage Level FARs

Because of a difference in line losses,¹⁰ there are different FARs for service taken at the Secondary, Primary, High Voltage, and Transmission voltage levels, reflected on lines 13, 15, 18, and 21 of proposed 4th Revised Sheet No. 71.32.

The AP46 FARs are in the table below:

Service	Proposed AP46 FAR	Line on 4th Revised Sheet No. 71.32
Secondary	\$0.00229/kWh	30
Primary	\$0.00222/kWh	31
High Voltage	\$0.00219/kWh	32
Transmission	\$0.00216/kWh	33

Listed below are the proposed AP46 FARs, the current AP45 FARs, and the difference between them for each service level:

Service	Proposed AP46 FAR	Current AP45 FAR	Difference
Secondary	\$0.00229	\$0.00400	\$0.00171 Decrease
Primary	\$0.00222	\$0.00388	\$0.00166 Decrease
High Voltage	\$0.00219	\$0.00382	\$0.00163 Decrease
Transmission	\$0.00216	\$0.00377	\$0.00161 Decrease

Based on a monthly usage of 1,000 kWh, the proposed change to the Secondary FAR would decrease the FAC of an Ameren Missouri residential customer’s monthly bill by \$1.71, from \$4.00 to \$2.29 per month.

In her filed testimony, Company witness Raysene Logan explains the FAR’s decrease:

The primary factors driving this change in the FAR were lower fuel and purchased power costs and higher off-system sales margins in Accumulation Period 46 as compared to Accumulation Period 44 and the net base energy costs applicable to each period. The lower fuel and purchased power costs are primarily due to decreased volumes and prices

¹⁰ Secondary, Primary, High Voltage, and Transmission Voltage Adjustment Factors are shown on lines 12, 14, 17, and 20 respectively, on Ameren Missouri’s proposed 4th Revised Sheet No. 71.32.

in Accumulation Period 46 as compared to Accumulation Period 44. The higher off-system sales margins are primarily a result of increased load being available for sale in Accumulation Period 46 as compared to Accumulation Period 44 and the net base energy costs for each period.¹¹

Staff reviewed the proposed 4th Revised Sheet No. 71.32, Ms. Logan's direct testimony, and the work papers in this filing, as well as Ameren Missouri's monthly information submitted in compliance with 20 CSR 4240-20.090(5) for AP46. Staff verified that the actual fuel and purchased power costs and emissions costs, net of off-system sales revenues, match the fuel and purchased power costs and emission costs, net of off-system sales revenues, on line 1 of Ameren Missouri's proposed 4th Revised Sheet No. 71.32, and Ms. Logan's supporting schedules (along with revised work papers). Staff reviewed Ameren Missouri's monthly reports and verified that the kWh billed, as shown on the monthly reports, matches the accumulation period sales used to calculate the Net Base Energy Cost. Staff reviewed Ameren Missouri's monthly interest rates that are applied to 95% of the over/under Net Base Energy Cost amount and verified that the monthly interest rates and calculations of monthly interest amounts are correct for AP46.

Staff Recommendation

Ameren Missouri timely filed its proposed MO.P.S.C. Schedule No. 6, 4th Revised Sheet No. 71.32, on August 1, 2024, and based on Staff's review, Staff determined that Ameren Missouri is in compliance with Commission Rule 20 CSR 4240-20.090 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements) and Ameren Missouri's FAC in its tariff.

Commission Rule 20 CSR 4240-20.090(8)(H) provides, in part:

- (H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either—
1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs;
 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or
 3. If it determines the adjustment to the FARs is not in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism

¹¹ Ameren Missouri, *Direct Testimony of Raysene Logan*, ER-2025-0041, page 4, line 7 through 14.

established in the electric utility's most recent general rate proceeding, reject the proposed rate sheets, suspend the timeline of the FAR adjustment filing, set a prehearing date, and order the parties to propose a procedural schedule. The commission may order the electric utility to file tariff sheet(s) to implement interim adjusted FARs to reflect any part of the proposed adjustment that is not in question.

Ameren Missouri requested that MO.P.S.C. Schedule No. 6, 4th Revised Sheet No. 71.32, filed August 1, 2024, become effective on October 1, 2024. Thus, the proposed tariff sheet was filed with 60 days' notice. Therefore, Staff recommends the Commission issue an order approving the following proposed tariff sheet, as filed on August 1, 2024, to become effective on October 1, 2024, subject to true-up and prudence reviews:

MO.P.S.C. Schedule No. 6
4th Revised Sheet No. 71.32, Cancelling 3rd Revised Sheet No. 71.32.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2023 Annual Report. Ameren Missouri is current on its 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. EO-2025-0042, as noted herein.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Adjustment of Union)
Electric Company d/b/a Ameren Missouri's) File No. ER-2025-0041
Fuel Adjustment Clause for the 46th)
Accumulation Period)
)

AFFIDAVIT OF AMANDA C. CONNER

STATE OF MISSOURI)
)) ss.
COUNTY OF COLE)

COMES NOW AMANDA C. CONNER 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.


AMANDA C. CONNER

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 29th day of August 2024.

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