

**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 Adjustment Clause)
for the 43rd Recovery Period) **File No. EO-2025-0042**

STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Staff Recommendation to Approve True-Up Filing respectfully states:

1. On August 1, 2024, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed with the Missouri Public Service Commission (“Commission”) its 43rd 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.

2. Rule 20 CSR 4240-20.090(9)(D) requires the Commission’s Staff to examine and analyze the information Ameren Missouri has submitted. Commission Rule 20 CSR 4240-20.090 provides a 60-day timeline for resolution of these rate adjustment mechanism proceedings. The Commission ordered Staff to file its Report and Recommendation no later than August 30, 2024.

3. As explained in Staff’s Memorandum, attached hereto as Appendix A and incorporated herein by reference, Staff recommends the Commission approve Ameren Missouri’s Recovery Period 43 true-up filing for the billing months of October 2023 through May 2024.

4. The true-up amount, without interest, of \$(5,016,665) as identified in this filing is the result of an over-recovery during RP43. RP43 was the billing months of October 2023 through May 2024. RP43 is the recovery period for and following AP43. AP43 was February 1, 2023 through May 31, 2023. The true-up amount without interest for RP43 of \$(5,016,665) and the interest amount for RP43 of \$3,050,743 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 46 (“AP46”) adjustment filing, also filed on August 1, 2024, in File No. ER-2025-0041, in compliance with Ameren Missouri’s FAC.

5. Staff reviewed and analyzed the direct testimony, supporting schedules and work papers of Ameren Missouri and witness Raysene Logan. Staff also reviewed Ameren Missouri’s monthly interest calculations. Staff agrees with the Company’s filings.

6. Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP43 true-up filing for the billing months of October 2023 through May 2024 as shown in the table below:

RP 43 True-Up filing with interest	\$ (1,965,922)
Accrued Interest	\$ 3,050,743
Total True-Up Amount for RP 43 without interest (over-collected)	\$ (5,016,665)

7. Staff verified that Ameren Missouri filed its 2023 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-2025-0041, as noted herein.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve Ameren Missouri's RP43 true-up filing for the billing months of October 2023 through May 2024 with a total True-Up Amount for RP 43 as set out in the body of this pleading.

Respectively submitted,

/s/ Paul T. Graham

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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 on this 29th day of August, 2024.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2025-0042
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's Analysis of and Recommendation Concerning Union Electric Company, d/b/a Ameren Missouri's 43rd Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: August 29, 2024

On August 1, 2024, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 43rd 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 \$(5,016,665) as identified in this filing is the result of an over-recovery during Recovery Period 43 ("RP43"). RP43 was the billing months of October 2023 through May 2024. RP43 is the recovery period for and following Accumulation Period 43 ("AP43"). AP43 was the accumulation months of February 2023 through May 2023. 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 \$5,016,665 from customers for the 43rd 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 \$3,050,743, 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 43rd Recovery Period of \$1,965,922. Schedule RL-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

The true-up amount¹ without interest for RP43 of \$(5,016,665)² and the interest amount for RP43 of \$3,050,743 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 46 (“AP46”) adjustment filing, also filed on August 1, 2024, in File No. ER-2025-0041, in compliance with Ameren Missouri’s FAC.³

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 RP43 true-up filing for the billing months of October 2023 through May 2024 as shown in the table below:

RP 43 True-Up filing with interest	\$ (1,965,922)
Accrued Interest	\$ 3,050,743
Total True-Up Amount for RP 43 without interest (over-collected)	\$ (5,016,665)

Staff verified that Ameren Missouri filed its 2023 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-2025-0041, as noted herein.

¹ See tab 1 (Summary) of “schedule rl-tu confidential” attached to the direct testimony of Raysene Logan for calculation of the RP43 true-up amount.

² This true-up amount is an over-recovery.

³ 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.”

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)
Adjustment Clause for the 43rd Recovery)
Period)
File No. EO-2025-0042

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