

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Request for)	<u>File No. GT-2025-0082</u>
Approval of a Revised Tariff Filing to)	Tariff No. JG-2025-0025
Adjust the Weather Normalization)	
Adjustment Rider (WNAR))	

**STAFF RECOMMENDATION FOR APPROVAL OF TARIFF SHEET TO ADJUST
AMEREN'S WEATHER NORMALIZATION ADJUSTMENT RIDER RATE**

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

1. On September 6, 2024, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed a tariff sheet to revise its Weather Normalization Adjustment Rider ("WNAR") rates for its Residential Customers. The tariff sheet has an issue date of September 2, 2024, an effective date of November 1, 2024, and was assigned Tracking No. JG-2025-0025.

2. On September 6, 2024, the Commission issued an order directing Staff to file a recommendation regarding the tariff sheet no later than October 3, 2024.

3. Upon Staff's review of a spreadsheet summarizing Ameren's Weather Normalization Adjustment ("WNA") reconciliation provided to Staff via email on September 9, 2024, and weather data previously provided by Staff to Ameren, Staff discovered data inconsistencies.

4. On September 27, 2024, Ameren provided additional information to Staff regarding its data and calculations used for its WNA. Staff filed a *Motion for Extension of Time to File Staff's Recommendation* on September 30, 2024, to allow Staff time to review said information from Ameren.

5. On October 1, 2024, the Commission granted Staff's Motion and ordered Staff to file its Recommendation no later than October 11, 2024.

6. Accompanying this pleading, and incorporated herein by reference as Appendix A, is Staff's Memorandum recommending Commission approval of the WNAR rates Ameren filed in its September 2, 2024, tariff sheet.

7. Staff's review of the additional files provided by Ameren eliminated all data inconsistencies with the exception of a single June 2024 WNA discrepancy caused by Ameren bill cycle changes around the Juneteenth holiday. This discrepancy causes a reduction of the Sum of Monthly WNA from \$4,075,881 to \$4,074,218, resulting in a reduction of the Weather Adjustment Rate for Residential Customers ("WR") from \$0.0712/hundred cubic feet ("Ccf") to \$0.0711/Ccf. Since Ameren intends to resolve this last-remaining discrepancy in its next WNA reconciliation, and Staff considers the resulting difference to be *de minimis*, the discrepancy and resulting difference do not change Staff's recommendation that the revised tariff sheet be approved.

8. The effect of Ameren's WNAR tariff sheet filing means that residential customers of Ameren who used 100 Ccf¹ of natural gas in a given billing month would see an approximate \$2.32 bill increase from current effective rates

9. Staff recommends approval of the filed tariff sheet in Tracking No. JG-2025-0025, as follows:

P.S.C. MO. No. 2

Third Revised Sheet No. 32.2 Cancelling Second Revised Sheet No. 32.2.

¹ Ccf stands for one hundred cubic feet of gas.

WHEREFORE, as set forth in Staff's Recommendation memorandum, Staff recommends the Commission issue an order approving the Ameren WNAR tariff sheet, as filed September 2, 2024:

P.S.C. MO. No. 2

Third Revised Sheet No. 32.2 Cancelling Second Revised Sheet No. 32.2

Respectfully submitted,

/s/ Andrea B. Hansen

Andrea B. Hansen

Legal Counsel

Missouri Bar No. 73737

Attorney for the Staff of the

Missouri Public Service Commission

200 Madison Street

P.O. Box 360

Jefferson City, Missouri 65102

Phone: (573) 522-1243

Fax: (573) 526-1500

E-mail: Andrea.Hansen@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 9th day of October, 2024.

/s/ Andrea B. Hansen

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GT-2025-0082, Tariff Tracking No. JG-2025-0025
Union Electric Company d/b/a Ameren Missouri

FROM: Michael D. Irwin, Senior Research/Data Analyst
Water, Sewer, Gas, and Steam Department

/s/ Michael D. Irwin / 10-9-2024
Senior Research/Data analyst / Date

SUBJECT: Staff Recommendation for the Approval of the Revised Tariff Sheet Filed by Union Electric Company d/b/a Ameren Missouri to reflect its Weather Normalization Adjustment Rider (“WNAR”) to go into effect on November 1, 2024.

DATE: October 9, 2024

On September 6, 2024, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed one tariff sheet designed to reflect the annual adjustment made pursuant to the Company’s Weather Normalization Adjustment Rider (“WNAR”) with a requested effective date of November 1, 2024. On September 6, 2024, the Commission directed Staff to file a recommendation on the pending tariff sheet no later than October 3, 2024. Upon Staff’s review of a spreadsheet summarizing Ameren’s Weather Normalization Adjustment (“WNA”) reconciliation provided to Staff via email on September 9, 2024, and weather data previously provided by Staff to Ameren, Staff discovered data inconsistencies. On September 20, 2024, Staff notified Ameren of these inconsistencies via email and requested a joint review, which was held online on September 26, 2024. As a result of this joint review, Ameren provided detailed files regarding the data and calculations used for their WNA on September 27, 2024. On September 30, 2024, Staff requested the Commission approve an extension until October 11, 2024, to file its recommendation to allow for review of the additional files. The Commission granted Staff’s request for an extension on October 1, 2024.

Staff’s review of the additional files provided by Ameren eliminated all data inconsistencies with the exception of a single June 2024 WNA discrepancy caused by Ameren bill cycle changes around the Juneteenth holiday. This discrepancy causes a reduction of the Sum of Monthly WNA from \$4,075,881 to \$4,074,218, resulting in a reduction of the Weather Adjustment Rate for Residential Customers (“WR”) from \$0.0712/hundred cubic feet (“Ccf”) to \$0.0711/Ccf. Since Ameren intends to resolve this last-remaining discrepancy in its next WNA reconciliation, and staff

APPENDIX A

considers the resulting difference to be *de minimis*, Staff recommends approval of the filed tariff sheet in Tracking No. JG-2025-0025.

This is Ameren Missouri’s third WNAR filing. Ameren’s WNAR became effective January 28, 2022. The purpose of the tariff is to adjust revenues for differences between actual heating degree days (“AHDD”) and normal heating degree days (“NHDD”). The weather normalization adjustments in dollars per Ccf are calculated for each billing cycle based on the difference between the actual and the normal weather measured for each billing cycle. Ameren Missouri’s current and proposed WR is included in Table 1 below.

Table 1: Current and Proposed WR (\$/Ccf).

Customer Class	Current WR (\$/Ccf)	Proposed WR (\$/Ccf)	Net Change (\$/Ccf)
Residential	0.0480	0.0712	0.0232

The proposed residential rate for Ameren’s Missouri district service area will increase customer gas bills. This means a residential customer that uses 100 Ccf of natural gas in a given billing month would see an approximate \$2.32 increase in their bill due to this request.

Staff Recommendation

Staff has reviewed and recommends approval of the following tariff sheet, as filed on September 6, 2024, and recommends this tariff sheet go into effect for service on or after November 1, 2024, (the requested effective date):

P.S.C. MO. No. 2
3rd Revised Sheet No. 32.2 Cancelling 2nd Revised Sheet No. 32.2

Staff has verified that Ameren has filed its Annual Report. Staff is not aware of any other matter pending before the before the Commission that affects or is affected by this tariff filing.

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Approval of a Revised Tariff Filing to) Tariff No. JG-2025-0025
Adjust the Weather Normalization)
Adjustment Rider (WNAR))

AFFIDAVIT OF MICHAEL D. IRWIN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

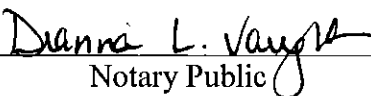
COMES NOW, MICHAEL D. IRWIN, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MICHAEL D. IRWIN

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 9th day of October 2024.


Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377