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-2025-0101 Tracking No. JG-2025-0058

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its Recommendation, states as follows:

1. On October 17, 2024, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri") filed a tariff sheet bearing an effective date of November 1, 2024, Tariff File No. JG-2025-0058, and an accompanying cover letter with supporting worksheets. The tariff sheet was filed to reflect changes in Ameren Missouri's Purchased Gas Adjustment ("PGA") factors as a result of estimated changes in the cost of natural gas and changes in the Actual Cost Adjustment ("ACA") factors.

2. The Commission issued an *Order Directing Filing* ("Order") on October 18, 2024, directing Staff to file a recommendation regarding Ameren Missouri's request and corresponding tariff sheet, Tariff File No. JG-2025-0058, no later than October 24, 2024. The Order further states that any other entity wishing to comment on the tariff shall do so by October 24, 2024.

3. The change on the Total PGA rate applicable to Ameren Missouri's service areas will decrease to 60.38¢/Ccf from 60.46¢/Ccf for firm sales customers. The interruptible sales customers' PGA will decrease to 39.09¢/Ccf from 46.46¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

4. Staff has reviewed Ameren Missouri's filing and determined it was calculated in conformance with Ameren Missouri's PGA Clause. Staff does not oppose

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the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Ameren Missouri's Commission-approved PGA Clause allowing for ten (10) business days' notice for PGA change filings.

5. For reasons more fully explained in Staff's Memorandum, attached hereto as Appendix A and incorporated herein, the PGA and ACA rate changes should be implemented on an interim basis, subject to refund status.

6. Due to the limited time available to review the documentation supporting the ACA factor in this filing, the Procurement Analysis Department has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2025.

7. Staff recommends the Commission approve the tariff sheet listed below and as in Tariff File No. JG-2025-0058, on an interim basis, subject to refund, for service on and after November 1, 2024.

P.S.C. MO. No. 2

124th Revised Sheet No. 30 Cancelling 123rd Revised Sheet No. 30

WHEREFORE, for the foregoing reasons and those stated in Staff's Memorandum attached hereto, Staff recommends that the Commission issue an order approving Ameren Missouri's tariff sheet filed in Tariff File No. JG-2025-0058, on an interim basis, subject to refund status and direct Staff to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2025.

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Respectfully submitted,

<u>/s/ Carolyn H. Kerr</u>

Missouri Bar # 45718 Senior Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-5397 (Voice) 573-526-6969 (Fax) Carolyn.kerr@psc.mo.gov

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 23rd day of October, 2024.

/s/ Carolyn H. Kerr

MEMORANDUM

- **TO:** Missouri Public Service Commission Official Case File Case No. GR-2025-0101, Tariff No. JG-2025-0058 Union Electric Company, d/b/a Ameren Missouri
- **FROM:** Kimberly Tones, CPA, CIA Lead Senior Utility Regulatory Auditor, Procurement Analysis Department

<u>/s/ David M. Sommerer</u> 10/23/2024 Financial and Business Analysis Division /Date

- **SUBJECT:** Staff Recommendation for Union Electric Company, d/b/a Ameren Missouri PGA Tariff Filing Effective November 1,
- **DATE:** October 23, 2024

On October 17, 2024, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), of St. Louis, Missouri, filed one (1) tariff sheet bearing an effective date of November 1, 2024. In addition, Ameren Missouri filed a cover letter and supporting worksheets. The tariff sheet was filed to reflect changes in Ameren Missouri's Purchased Gas Adjustment ("PGA") factors as a result of estimated changes in the cost of natural gas and changes in the Actual Cost Adjustment ("ACA") factors. Ameren Missouri requests the pending tariff sheet go into effect on November 1, 2024.

On October 18, 2024, the Commission issued its *Order Directing Responses*. The Order directs Staff to file its recommendation no later than October 24, 2024.

Ameren Missouri states the following in its cover letter:

The revised sheet changes the Company's Purchased Gas Adjustment ("PGA") Rider, and more specifically, reflects an adjustment to the Regular Purchased Gas Adjustment ("RPGA") factor. The change in the Total PGA rate applicable to the Company's service areas will decrease to 60.38 ¢/Ccf from 60.46 ¢/Ccf for firm sales customers. The interruptible sales customers' PGA will decrease to 39.09 ¢/Ccf from 46.46 ¢/Ccf. The transportation PGA will remain unchanged at 0.00 ¢/Ccf.

These rate changes, both PGA and ACA, should be implemented on an interim basis, subject to refund status pending the final Commission decision in ACA Case No. GR-2023-0392. Due to

Appendix A

MO PSC CASE NO. GR-2025-0101 OFFICIAL CASE FILE MEMORANDUM Tariff No. JG-2025-0058 October 23, 2024 Page 2 of 2

the limited time available to review the documentation supporting the ACA factor submitted in this filing, the Procurement Analysis Department requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2025. The ACA procedure involves review of and true-up to the actual gas costs incurred.

As of the issuance of this memo, the Company is not delinquent on its PSC assessment.

Staff has verified that Ameren Missouri has filed its annual report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing other than as set forth above.

Staff has reviewed this filing and has determined it was calculated in conformance with Ameren Missouri's PGA Clause. Staff does not oppose the approval of this tariff sheet on less than thirty (30) days' notice. Such action is supported by Ameren Missouri's Commission-approved PGA clause allowing for notice of ten (10) business days for PGA change (both increases and decreases) filings.

Therefore, Staff recommends the following tariff sheet, as filed on October 17, 2024, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2 124th Revised SHEET No. 30 Cancelling 123rd Revised SHEET No. 30

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Purchased Gas Adjustment Tariff Filing

Case No. GR-2025-0101 Tariff No. JG-2025-0058

AFFIDAVIT OF KIMBERLY K. TONES, CIA, CPA

STATE OF MISSOURI)) SS. COUNTY OF COLE)

COMES NOW Kimberly K. Tones, CIA, CPA, 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, under penalty of perjury.

Further the Affiant sayeth not.

KIMBERLY K. TONES, CIA,

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 22+1 day of October 2024.

Dianna L. Varight

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