

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Adjustment to	)	<u>File No. ER-2025-0119</u>
RESRAM Rate - Sixth Accumulation Period	)	Tariff No. JE-2025-0043

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and for its *Staff Recommendation*, respectfully states as follows:

1. On September 27, 2024, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) filed a tariff and supporting testimony to implement a rate adjustment under its Renewable Energy Standard Rate Adjustment Mechanism (“RESRAM”) for the 6th accumulation period ending July 31, 2024, pursuant to Commission Rule 20 CSR 4240-20.100. The submitted tariff sheet bore an effective date of February 1, 2025. On the same day, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation*, ordering Staff to “file a recommendation regarding its examination and analysis of Ameren Missouri’s RESRAM no later than November 26, 2024.”

2. As detailed in Staff’s Memorandum, attached and incorporated herein as Appendix A, Staff reviewed Ameren Missouri’s data and calculation related to its proposed tariff sheet and recommends that the Commission issue an order approving the following tariff sheet or allowing the tariff sheet to go into effect by operation of law on February 1, 2025:

P.S.C. MO. No. 6  
9<sup>th</sup> Revised Tariff Sheet No. 93.4 Cancelling 8<sup>th</sup> Revised Tariff Sheet No. 93.4

3. The prospective RESRAM rate is a \$0.00313 charge to ratepayers. Ratepayers using 1,000 kWh per month will see a \$3.13 billing charge which is a \$1.09 (or 53.4%) increase per month when compared to the previous period RESRAM rate of \$0.00204 per kWh. Application of this rate will not exceed the annual rate cap pursuant to § 393.1655 RSMo.

4. Staff verified that Ameren Missouri filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter pending before the Commission that affects or is affected by this filing.

**WHEREFORE**, Staff recommends that the Commission issue an order approving the tariff sheet Ameren Missouri filed on September 27, 2024, with an effective date of February 1, 2025, or allowing the tariff sheet to go into effect by operation of law on that date.

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](mailto:Andrea.Hansen@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record on this 25<sup>th</sup> day of November, 2024.

**/s/ Andrea B. Hansen**

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File  
Case No. ER-2025-0119 and Tariff Tracking No. JE-2025-0043

**FROM:** Randall Jennings, Research/Data Analyst  
Tariff/Rate Design Department

**SUBJECT:** Staff Recommendation to Approve the Tariff Sheet Filed to Adjust the Renewable Energy Standard Rate Adjustment Mechanism of Union Electric Company, d/b/a Ameren Missouri.

**DATE:** November 25, 2024

### BACKGROUND

On September 27, 2024, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) filed a tariff and supporting testimony to implement a rate adjustment under its Renewable Energy Standard Rate Adjustment Mechanism (“RESRAM”) for the 6th accumulation period ending July 31, 2024, pursuant to Commission Rule 20 CSR 4240-20.100. The submitted tariff sheet bore an effective date of February 1, 2025 and filed under Tariff Tracking No. JE-2025-0043.

The total RESRAM expense balance for the accumulation period ending July 31, 2024 was \$61,977,596. Total Renewable Energy Standard Costs Recovered for the same accumulation period were \$25,761,307. Subtracting this recovery and adding interest of \$2,761,617 produces a RES under recovery totaling \$38,977,906. Ameren Missouri calculated the annual RESRAM Revenue Requirement going forward to be \$54,771,701<sup>1</sup> and Ameren Missouri calculated a current true-up amount of \$1,331,659. Adding these amounts together results in total RESRAM Recoveries of \$95,081,266 to be collected from February 1, 2025 through January 31, 2026.

Using Ameren Missouri’s projected energy level of 30,408,985,779 kWh and the total RESRAM recoveries mentioned above, the RESRAM rate will be \$0.00313 per kWh. Customers using 1,000 kWh per month will see a \$3.13 billing charge which is a \$1.09 (or 53.4%) increase per month when compared to the previous period RESRAM rate of \$0.00204 per kWh. Application of this rate will not exceed the annual rate cap pursuant to Section 393.1655 RSMo.

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<sup>1</sup> RESRAM Revenue Requirement is calculated per tariff formula which deducts a RESRAM Base Amount established in case number ER-2022-0337 from annualized expenses.

The following chart compares the proposed RESRAM rate and the major costs of the rate calculations to the same cost from the previous Accumulation Period's (AP) annual adjustment filing:

Ameren Missouri			
Rider RESRAM			
Accumulation Period 6			
Rate Calculation for Recovery Period 6			
	2022 Filing	2023 Filing	Current Filing
	August 2021 - July 2022	August 2022 - July 2023	August 2023 - July 2024
Actual RES Costs Incurred in Accumulation Period (ARC)	\$ 19,971,040	\$ 44,316,720	\$ 61,977,596
RES Expenses Recovered in Accumulation Period (RCR)	\$ 10,100,629	\$ 21,764,556	\$ 25,761,307
(Over)/Under Recovered Costs	\$ 9,870,411	\$ 22,552,164	\$ 36,216,289
Interest	\$ 31,777	\$ 946,292	\$ 2,761,617
RES Over/Under Recovery (ROUR)	\$ 9,902,188	\$ 23,498,457	\$ 38,977,905
RES Revenue Requirement (RRR)	\$ 687,443	\$ 37,110,825	\$ 54,771,701
True-Up (T)	\$ (12,918)	\$ 1,698,443	\$ 1,331,659
Ordered Adjustment (OA)	\$ -	\$ -	\$ -
Total RESRAM Recoveries (TRR)	\$ 10,576,713	\$ 62,307,725	\$ 95,081,266
Estimated Recovery Period Sales (kWh) (S <sub>RP</sub> )	30,555,292,791	30,501,112,633	30,408,985,779
TRR Rate	0.00035	0.00204	0.00313
Required Offset Amount	-	-	-
RESRAM Rate	0.00035	0.00204	0.00313
Increase		0.00170	0.00108
% Increase		490%	53%

**STAFF RECOMMENDATION**

Staff has reviewed the revised tariff sheet as submitted on September 27, 2024 and recommends the Commission issue an order either approving the tariff sheet below or allowing the tariff sheet to take effect by operation of law on February 1, 2025:

**P.S.C. MO. No. 6**

9th Revised Sheet No. 93.4, canceling 8th Revised Sheet No. 93.4

Staff has verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri's Adjustment to RESRAM ) Case No. ER-2025-0119  
Rate – Sixth Accumulation Period )

**AFFIDAVIT OF RANDALL T. JENNINGS**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

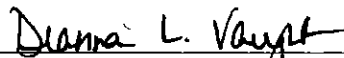
**COMES NOW RANDALL T. JENNINGS** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
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RANDALL T. JENNINGS

**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 22nd day of November 2024.

  
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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