



Accumulation Period 44 (“AP44”). The AP44 were the accumulation months of June 2023 through September 2023.

5. Ameren Missouri calculates that the true-up amount, without interest, of \$(1,319,614), was the result of an over-recovery during RP44.

6. Ameren Missouri states that the true-up amount without interest for RP44 of \$(1,319,614) and the interest amount for RP44 of \$3,436,797 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 47 (“AP47”) adjustment filing, also filed on December 2 in File No. ER-2025-0171, in compliance with Ameren Missouri’s FAC.

7. Staff examined Ms. Logan’s direct testimony, the supporting schedules that Ameren Missouri provided with its application, and the monthly reports that Ameren Missouri submitted to the Commission. Staff also reviewed Ameren Missouri’s monthly interest calculations. Staff’s investigation, calculations, findings, conclusions, and recommendations are set out fully and in detail in its Memorandum filed contemporaneously with this pleading as **Appendix A**.

8. As set out in Staff’s Memorandum, Staff agrees with Ameren Missouri’s calculations and recommends that the Commission approve Ameren Missouri’s RP44 true-up filing for the billing months of February 2024 through September 2024 as shown in the table below:

RP 44 True-Up filing with interest	\$ 2,117,183
Accrued Interest	\$ 3,436,797
Total True-Up Amount for RP 44 without interest (over-collected)	\$ (1,319,614)

9. 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-2025-0171, as noted herein.

**WHEREFORE**, Staff submits its analysis and recommends that the Commission approve Ameren's RP44 true-up filing for the billing months of February 2024 through September 2024 with a total true-up amount for RP 44 without interest of \$(1,319,614).

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 this 31<sup>st</sup> day of December, 2025.

/s/ Paul T. Graham

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. EO-2025-0172  
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Senior Utility Regulatory Auditor

DATE: /s/ Amanda C. Conner                      12/31/2024  
Energy Resources Department              / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company, d/b/a Ameren Missouri's 44<sup>th</sup> Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: December 31, 2024

On December 2, 2024, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its 44th 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 \$(1,319,614) as identified in this filing is the result of an over-recovery during Recovery Period 44 ("RP44"). RP44 was the billing months of February 2024 through September 2024. RP44 is the recovery period for and following Accumulation Period 44 ("AP44"). AP44 was the accumulation months of June 2023 through September 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 \$1,319,614 from customers for the 44<sup>th</sup> 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 \$3,436,797, 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 under-recovery from customers for the 44<sup>th</sup> Recovery Period of \$2,117,183. 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 amount<sup>1</sup> without interest for RP44 of \$(1,319,614)<sup>2</sup> and the interest amount for RP44 of \$3,436,797 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 47 (“AP47”) adjustment filing, also filed on December 2, 2024, in File No. ER-2025-0171, in compliance with Ameren Missouri’s FAC.<sup>3</sup>

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 RP44 true-up filing for the billing months of February 2024 through September 2024 as shown in the table below:

RP 44 True-Up filing with interest	\$ 2,117,183
Accrued Interest	\$ 3,436,797
Total True-Up Amount for RP 44 without interest (over-collected)	\$ (1,319,614)

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-2025-0171, as noted herein.

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<sup>1</sup> See tab 1 (Summary) of “schedule rl-tu confidential” attached to the direct testimony of Raysene Logan for calculation of the RP44 true-up amount.

<sup>2</sup> This true-up amount is an over-recovery.

<sup>3</sup> 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 ) File No. EO-2025-0172  
Fuel Adjustment Clause for the 44<sup>th</sup> )  
Recovery Period )

**AFFIDAVIT OF AMANDA CONNER**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

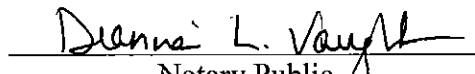
**COMES NOW AMANDA CONNER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
AMANDA 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 31<sup>st</sup> day of December, 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