

4. On January 16, 2025, the Commission issued an *Order Directing Responses* and ordered Staff to respond to Ameren Missouri's response no later than January 30, 2025.

5. Staff has reviewed Ameren Missouri's Response to Commission Order and documentation provided by Ameren Missouri, and Staff sets forth its response to Ameren Missouri's items six – twelve as follows:

6. The adjustment of \$2,282 originated in GR-2021-0291 (2020-2021 ACA case), which in the 2021-2022 ACA GR-2022-0351 case would have reversed; therefore, it does not appear that a further adjustment is needed in this case (GR-2023-0392, 2022-2023 ACA case).

7 – 8. Billed revenues are based on volumes of consumed natural gas measured in CCF multiplied by the Commission approved PGA/ACA rates per CCF. While assuming a 1:1 ratio regarding CCF and BTU is acceptable in some situations, such as in estimating unbilled revenues, using BTU and CCF interchangeably when they are, in fact, not a 1:1 equivalent when presenting actual revenue information lead to calculated rates that were not approved by the Commission. Staff's comment regarding materiality was made with respect to the reclassifications or shifts seen in expenditures between customer classes and allocations between PGA v. ACA revenues once Staff corrected the revenue summary with the CCF volumes. All reports and summaries that quantify actual revenues should reflect the volumes those revenues are based upon.

9 – 10. The ACA ending balance reflects actual revenues less actual expenses. The invoice in question was booked in April of 2023 but was never invoiced by the supplier; and hence, was not supported and should be excluded from the ending ACA balance.

11 – 12. The screenshot provided seems to indicate that on February 1st, the Federal Open Market Committee voted to raise the rates; not that the rate was in effect on February 1st. It should also be noted that the rates published in the Wall Street Journal ("WSJ"), generally on page B7 of the WSJ, reflect the rate in effect for the prior day. Also supporting Staff's adjustment, below are the prime rates pulled from the Federal Reserve Bank of St. Louis.

The Staff adjustment used the prime rate of 7.5% in calculating January carrying costs for all Missouri LDCs.

FRED Graph Observations			
Federal Reserve Economic Data			
Link: https://fred.stlouisfed.org			
Help: https://fredhelp.stlouisfed.org			
Economic Research Division			
Federal Reserve Bank of St. Louis			
DPRIME	Bank Prime Loan Rate, Percent, Daily, Not Seasonally Adjusted		
Frequency: Daily			
observation_date	DPRIME		
2023-01-27		7.50	
2023-01-30		7.50	
2023-01-31		7.50	
2023-02-01		7.50	
2023-02-02		7.75	
2023-02-03		7.75	
2023-02-06		7.75	
2023-02-07		7.75	
2023-02-08		7.75	
2023-02-09		7.75	
2023-02-10		7.75	

6. All recommended adjustments were supported by audit evidence, and as such, Staff recommends the Commission issue an order requiring Ameren Missouri to (as reflected in Staff’s Recommendation filed on December 13, 2024):

A. Adjust the balances in its next ACA filing to reflect Staff’s recommended ending (over)/under recovery ACA balances per the following table:

August 31, 2023 Ending ACA Balances			
Customer Class	Reported	Adjustments	Staff Recommended
Firm	\$ 7,687,599.77	\$ (4,669.48)	\$ 7,682,930.29
Interruptible	\$ 104,694.80	\$ (593.06)	\$ 104,101.74

A positive ACA balance indicates an under-recovery that must be collected from customers. A negative ACA balance indicates an over-recovery that must be returned to customers.

B. Use CCFs in all reports and summaries that quantify actual revenues to avoid confusion.

WHEREFORE, Staff submits its Staff Reply and Recommendation to Approve ACA Balances, and for the reasons stated above Staff respectfully recommends the Commission issue an order approving Ameren Missouri's ACA balances as set forth in paragraph 6 above; and for any other relief as is just and reasonable under the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

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**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 30th day of January, 2025.

/s/ J. Scott Stacey

