

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

In the Matter of the Union Electric Company)	
d/b/a Ameren Missouri's Fuel Adjustment)	<u>File No. ER-2025-0262</u>
Clause for the 48 th Accumulation Period)	<u>Tariff No. JE-2025-0141</u>

STAFF RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission, through counsel, and for its recommendation states:

1. On April 1, 2025, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed one proposed tariff sheet, bearing an effective date of June 1, 2025, to revise its current period Fuel Adjustment Rates ("FARs") for the 48th Accumulation Period ("AP48") of its Fuel Adjustment Clause ("FAC"). This proposed tariff sheet is MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, bearing a proposed effective date of June 1, 2025, and cancelling the MO.P.S.C. Schedule No. 6, 5th Revised Sheet No. 71.32. The Commission assigned it Tariff No. JE-2025-0141.

2. Concurrently on April 1, 2025, Ameren Missouri submitted a FAC true-up filing in File No. EO-2025-0263 to identify the true-up amount of (\$2,032,084) for the 45th Recovery Period ("RP45") of its FAC. This amount and interest for RP45 are included in calculation of the FARs for AP48.

4. Commission Rule 20 CSR 4240-20.090(8)(F) provides that "[w]ithin thirty (30) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the staff shall submit a recommendation regarding its examination and analysis to the commission[.]" Staff must determine if Ameren Missouri's proposed adjustments to its FAC rates are in accordance with 20 CSR 4240-20.090 ("Fuel and Purchased Power

Rate Adjustment Mechanisms”); § 386.266, RSMo; and the “FAC mechanism established, continued, or modified in the utility’s most recent general rate proceeding.”¹

5. If the proposed rate adjustments are in accordance with the rule, statute, and FAC mechanism referenced above, 20 CSR 4240-20.090(8)(H)(1) and (2) provide:

- (H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either
 1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs [or]
 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order[.]

6. In the attached *Memorandum*, attached hereto and incorporated by reference herein as **Appendix A**, Staff recommends that the Commission issue an order approving Ameren Missouri’s proposed tariff sheet MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, filed April 1, 2025, become effective on June 1, 2025, subject to true-up and prudence reviews.

7. For AP48, the fuel and purchased power adjustment (“FPA”) amount is \$50,938,639, which divided by the forecasted net system input for AP48 of 22,425,313,714 kWh results in a current period FAR₄₈ of \$0.00227 per kWh. When this is added to the prior period FAR₄₇ of \$0.00114 per kWh, the result is a proposed AP48 FAR of \$0.00341 per kWh. The proposed AP48 FAR of \$0.00341 per kWh is \$0.000233 per kWh more than the AP47 FAR of \$0.00108 per kWh.²

8. Raysene Logan, Manager, Power and Fuels Accounting, Ameren Services Company, explains the FAR’s decrease in her filed testimony, as follows:

The primary factors driving this change in the FAR were higher fuel and purchased power costs, and lower off-system sales margins,

¹ 20 CSR 4240-20.090(8)(F).

² The proposed AP48 FAR of \$0.00341 per kWh can be found on Line 11⁶ of the proposed 6th Revised Sheet No. 71.32.

partially offset by higher net capacity sales revenue in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs applicable to each period. The higher fuel and purchased power costs are primarily due to the higher MISO prices during the January cold stretch as part of Accumulation Period 48. The lower off-system sales margins are primarily a result of decreased energy being available for sale in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs for each period. The higher net capacity sales revenue is primarily a result of favorable financial transmission rights management in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs for each period.³

9. Because of a difference in line losses,⁴ there are different FARs for service taken at the Secondary, Primary, High Voltage, and Transmission voltage levels, reflected on lines 13, 15, 18, and 21 of proposed 6th Revised Sheet No. 71.32. The AP48 FARs are in the table below:

Service	Proposed AP48 FAR	Line on 6th Revised Sheet No. 71.32
Secondary	\$0.00360/kWh	30
Primary	\$0.00349/kWh	31
High Voltage	\$0.00343/kWh	32
Transmission	\$0.00339/kWh	33

10. Based on a monthly usage of 1,000 kWh, the proposed change to the Secondary FAR would increase the FAC of an Ameren Missouri residential customer's monthly bill by \$2.46, from \$1.14 to \$3.60 per month.

³ Ameren Missouri, *Direct Testimony of Raysene Logan*, ER-2024-0262, page 4, line 11 through page 5, line 3.

⁴ Secondary, Primary, High Voltage, and Transmission Voltage Adjustment Factors are shown on lines 12, 14, 17, and 20 respectively, on Ameren Missouri's proposed 6th Revised Sheet No. 71.32.

11. Except for Ameren Missouri's RP45 true-up filing in File No. EO-2025-0263, also filed April 1, 2025, Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

12. Staff's review shows Ameren Missouri's filing is in compliance with 20 CSR 4240-20.090; § 386.266, RSMo; and Ameren Missouri's FAC embodied in its tariff.

13. Staff verified that Ameren Missouri is not delinquent on any assessment and Ameren Missouri filed its 2024 annual report. Ameren Missouri is current on submission of its monthly reports, required by 20 CSR 4240-20.090(5), and its surveillance monitoring reports, required by 20 CSR 4240-20.090(6).

WHEREFORE, for the above-stated reasons, Staff recommends that the Commission issue an order approving Ameren Missouri's proposed tariff sheet MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, filed April 1, 2025, become effective on June 1, 2025, cancelling MO.P.S.C. Schedule No. 6, 5th Revised Sheet No. 71.32, subject to true-up and prudence reviews.

Respectfully submitted,

/s/ Carolyn H. Kerr

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record on this 25th day of April, 2025.

/s/ Carolyn H. Kerr

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2025-0262, Tariff Tracking No. JE-2025-0141
Union Electric Company, d/b/a Ameren Missouri

FROM: Brooke Mastrogiannis, Utility Regulatory Audit Supervisor

DATE: /s/ Brooke Mastrogiannis 04/25/2025
Energy Resources Department/Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates Related to Ameren Missouri's Fuel Adjustment Clause for the 48th Accumulation Period

DATE: April 25, 2025

On April 1, 2025, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one tariff sheet, MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, bearing a proposed effective date June 1, 2025, and cancelling the MO.P.S.C. Schedule No. 6, 5th Revised Sheet No. 71.32. The 6th Revised Sheet No. 71.32 revises Ameren Missouri's Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 48 ("AP48"), which ended on January 31, 2025. Staff recommends that the Missouri Public Service Commission ("Commission") approve MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32.

Ameren Missouri's April 1, 2025, filing includes the testimony of Raysene Logan, Manager, Power and Fuels Accounting, at Ameren Services Company, and associated work papers. The testimony and work papers include information and data that supports Ameren Missouri's calculation of its Fuel and Purchased Power Adjustment ("FPA"). That dollar amount ("FPA Amount") is \$50,938,639 and is reflected on line 5 of 6th Revised Sheet No. 71.32. This FPA Amount results in a FAR₄₈¹ of \$0.00227 per kWh, which, when added to the FAR₄₇²

¹ FAR_{RP} is defined in 1st Revised Sheet No. 71.24 as "FAR Recovery Period rate component calculated to recover under- or over-collection during the Accumulation Period that ended immediately prior to the applicable filing." Since this filing followed Accumulation Period 48, FAR_{RP} in this recommendation is referred to as FAR₄₈.

² FAR_(RP-1) is defined in 1st Revised Sheet No. 71.24 as "FAR Recovery Period rate component for the under- or over-collection during the Accumulation Period immediately preceding the Accumulation Period that ended immediately prior to the application filing for FAR_(RP)." Since this filing followed Accumulation Period 47, FAR_(RP-1) in this recommendation is referred to as FAR₄₇.

of \$0.00114 per kWh, results in a proposed FAR³ of \$0.00341 per kWh. The proposed AP48 FAR of \$0.00341 per kWh on line 11⁴ of 6th Revised Sheet No. 71.32, is \$0.00233 per kWh more than the AP47 FAR of \$0.00108 per kWh on line 11 of the 5th Revised Sheet No. 71.32.

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri's work papers for AP48 show the following:

Actual Net Energy Costs ("ANEC") ⁵	\$193,849,340
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The Net Base Energy Costs calculation is shown below as Sales multiplied by the Base Factor:

Sales in kWh	10,779,810,352
Base Factor ("BF") per kWh	\$0.01328
Net Base Energy Costs ("B") ⁶	\$143,155,882

The total Company Fuel and Purchased Power Difference calculation is shown below as B subtracted from ANEC:

ANEC	\$193,849,340
B	\$143,155,882
Fuel and Purchased Power Difference	\$50,693,458

³ FAR is defined in 1st Revised Sheet No. 71.24 as "Fuel Adjustment Rate applied to retail customer usage on a per kWh basis starting with the applicable Recovery Period following the FAR filing." Therefore, $FAR = FAR_{(RP)} + FAR_{(RP-1)}$.

⁴ Since the Preliminary Fuel Adjustment Rate ("PFAR") on line 9 did not change after the PISA calculations Rate Adjustment Cap ("RAC") on Line 10, line 9 is carried to line 11.

⁵ ANEC = fuel costs (FC), plus purchased power costs (PP), plus net emission allowances (E), plus or minus net insurance recoveries (R), minus off-system sales revenues (OSSR), as reflected on line 1 of 6th Revised Sheet No. 71.32.

⁶ B = Base Factor multiplied by the accumulation period sales as reflected on lines 2, 2.1, and 2.2 of 6th Revised Sheet No. 71.32.

Calculation of FPA Amount

Ameren Missouri's work papers and 6th Revised Sheet No. 71.32, show the FPA Amount⁷ of \$50,938,639 to be the sum of:

1. Fuel and purchased power amount to be recovered from customers for AP48 of \$48,158,786⁸ (line 4 on proposed 6th Revised Sheet No. 71.32); plus,
2. Interest of \$4,811,937, which is \$193,268 for AP48 plus \$4,618,668 for Recovery Period 45 ("RP45") (line 4.1 of proposed 6th Revised Sheet No. 71.32); plus,
3. The true-up amount, without interest, of \$(2,032,084) (line 4.2 of proposed 6th Revised Sheet No. 71.32). This amount is pending Commission approval in File No. EO-2025-0263.

Calculation of FAR₄₈

The calculated FAR₄₈ of \$0.00227 per kWh is equal to the FPA Amount of \$50,938,639, divided by the Estimated Recovery Period Sales of 22,425,313,714 kWh, according to Ameren Missouri's commercial pricing node.⁹ FAR₄₈ will apply during Recovery Period 48 ("RP48"), which is Ameren Missouri's billing months of June 2025 through January 2026.

Calculation of FAR Without Voltage Level Adjustments

Line 9 of Ameren Missouri's proposed 6th Revised Sheet No. 71.32, reflects a FAR of \$0.00341 per kWh which is the sum of: (1) FAR₄₈ of \$0.00227 per kWh and (2) FAR₄₇ of \$0.00114 per kWh.

⁷ 6th Revised Sheet No. 71.32, lines 1 through 5 include the complete calculation of the FPA Amount of \$50,938,639.

⁸ Fuel and purchased power amount to be recovered from customers for AP48 is equal to 95% of \$50,693,458 (the difference between ANEC and B during AP48).

⁹ Midcontinent Independent System Operator, Inc.'s, ("MISO's") Market Settlements Business Settlements Practice Manual, BPM-005 Effective Date: September 16, 2023. The Commercial Pricing Node ("CPNode") represents the next hierarchical level in the Commercial Model and consists of one or more Elemental Pricing Node ("EPNodes") (electrical locations). All energy transactions, both physical and financial, are financially settled at the CPNode level. Operating Reserve supply is financially settled at the Resource CPNode level based on the appropriate CPNode MCPs. All Market Settlement activity is performed at a CPNode and is the level where locational marginal prices ("LMPs") and market clearing prices ("MCPs") are publicly available.

	Proposed AP48 FAR 6th Revised Sheet No. 71.32	Current AP47 FAR 5th Revised Sheet No. 71.32
Line 7. Current Period Fuel Adjustment Rate (FAR _{RP})	0.00227/kWh	\$0.00114/kWh
Line 8. Prior Period Fuel Adjustment Rate (FAR _{RP-1})	\$0.00114/kWh	\$(0.00006)/kWh
Line 9. Fuel Adjustment Rate (FAR)	\$0.00341/kWh	\$0.00108/kWh

Voltage Level FARs

Because of a difference in line losses,¹⁰ there are different FARs for service taken at the Secondary, Primary, High Voltage, and Transmission voltage levels, reflected on lines 13, 15, 18, and 21 of proposed 6th Revised Sheet No. 71.32.

The AP48 FARs are in the table below:

Service	Proposed AP48 FAR	Line on 6th Revised Sheet No. 71.32
Secondary	\$0.00360/kWh	30
Primary	\$0.00349/kWh	31
High Voltage	\$0.00343/kWh	32
Transmission	\$0.00339/kWh	33

Listed below are the proposed AP48 FARs, the current AP47 FARs, and the difference between them for each service level:

Service	Proposed AP48 FAR	Current AP47 FAR	Difference
Secondary	\$0.00360	\$0.00114	\$0.00246 Increase
Primary	\$0.00349	\$0.00110	\$0.00239 Increase
High Voltage	\$0.00343	\$0.00108	\$0.00235 Increase

¹⁰ Secondary, Primary, High Voltage, and Transmission Voltage Adjustment Factors are shown on lines 12, 14, 17, and 20 respectively, on Ameren Missouri's proposed 6th Revised Sheet No. 71.32.

Transmission	\$0.00339	\$0.00107	\$0.00232 Increase
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Based on a monthly usage of 1,000 kWh, the proposed change to the Secondary FAR would increase the FAC of an Ameren Missouri residential customer's monthly bill by \$2.46, from \$1.14 to \$3.60 per month.

In her filed testimony, Company witness Raysene Logan explains the FAR's increase:

The primary factors driving this change in the FAR were higher fuel and purchased power costs, and lower off-system sales margins, partially offset by higher net capacity sales revenue in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs applicable to each period. The higher fuel and purchased power costs are primarily due to the higher MISO prices during the January cold stretch as part of Accumulation Period 48. The lower off-system sales margins are primarily a result of decreased energy being available for sale in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs for each period. The higher net capacity sales revenue is primarily a result of favorable financial transmission rights management in Accumulation Period 48 as compared to Accumulation Period 46 and the net base energy costs for each period.¹¹

Staff reviewed the proposed 6th Revised Sheet No. 71.32, Ms. Logan's direct testimony, and the work papers in this filing, as well as Ameren Missouri's monthly information submitted in compliance with 20 CSR 4240-20.090(5) for AP48. Staff verified that the actual fuel and purchased power costs and emissions costs, net of off-system sales revenues, match the fuel and purchased power costs and emission costs, net of off-system sales revenues, on line 1 of Ameren Missouri's proposed 6th Revised Sheet No. 71.32, and Ms. Logan's supporting schedules (along with revised work papers). Staff reviewed Ameren Missouri's monthly reports and verified that the kWh billed, as shown on the monthly reports, matches the accumulation period sales used to calculate the Net Base Energy Cost. Staff reviewed Ameren Missouri's monthly interest rates that are applied to 95% of the over/under Net Base Energy Cost amount and verified that the monthly interest rates and calculations of monthly interest amounts are correct for AP48.

¹¹ Ameren Missouri, *Direct Testimony of Raysene Logan*, ER-2025-0262, page 4, line 11 through page 5, line 3.

Staff Recommendation

Ameren Missouri timely filed its proposed MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, on April 1, 2025, and based on Staff's review, Staff determined that Ameren Missouri is in compliance with Commission Rule 20 CSR 4240-20.090 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements) and Ameren Missouri's FAC in its tariff.

Commission Rule 20 CSR 4240-20.090(8)(H) provides, in part:

- (H) Within sixty (60) days after the electric utility files its testimony and tariff sheet(s) to adjust its FARs, the commission shall either—
1. Issue an interim rate adjustment order approving the tariff sheet(s) and the adjustments to the FARs;
 2. Allow the tariff sheet(s) and the adjustments to the FARs to take effect without commission order; or
 3. If it determines the adjustment to the FARs is not in accordance with the provisions of this rule, section 386.266, RSMo, and the FAC mechanism established in the electric utility's most recent general rate proceeding, reject the proposed rate sheets, suspend the timeline of the FAR adjustment filing, set a prehearing date, and order the parties to propose a procedural schedule. The commission may order the electric utility to file tariff sheet(s) to implement interim adjusted FARs to reflect any part of the proposed adjustment that is not in question.

Ameren Missouri requested that MO.P.S.C. Schedule No. 6, 6th Revised Sheet No. 71.32, filed April 1, 2025, become effective on June 1, 2025. Thus, the proposed tariff sheet was filed with 60 days' notice. Therefore, Staff recommends the Commission issue an order approving the following proposed tariff sheet, as filed on April 1, 2025, to become effective on June 1, 2025, subject to true-up and prudence reviews:

MO.P.S.C. Schedule No. 6
6th Revised Sheet No. 71.32, Cancelling 5th Revised Sheet No. 71.32.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2024 Annual Report. Ameren Missouri is current on its submission of its Surveillance Monitoring reports, required by 20 CSR 4240-20.090(6), and its monthly reports, 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. EO-2025-0263, as noted herein.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Adjustment of Union Electric)	
Company d/b/a Ameren Missouri's Fuel)	<u>File No. ER-2025-0262</u>
Adjustment Clause for the 48 th Accumulation)	<u>Tariff No. JE-2025-0141</u>
Period)	

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

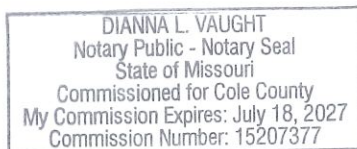
COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

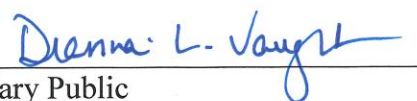
Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

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 15th day of April 2025.




Notary Public