

**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 Fuel)	<u>File No. EO-2022-0142</u>
Adjustment Clause for the 35th Recovery Period)	Tariff No. YE-2022-0163

STAFF RECOMMENDATION

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

1. On November 24, 2021, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its 35th fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On December 1, 2021, the Commission ordered Staff to file a recommendation by December 23, 2021.

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri’s true-up filing for its 35th Recovery Period (“RP35”) (billing months of February 2021 through September 2021), during which Ameren Missouri under-recovered \$2,191,826, without interest, from its customers. Staff’s analysis is contained in the attached *Memorandum*, attached as Appendix A.

4. The under-recovered amount of \$2,191,826, without interest, which is the true-up amount for RP35, and interest to be refunded for RP35 of \$(813,522), are both included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in Ameren Missouri’s 38th Accumulation Period (“AP38”) adjustment filing, also filed on November 24, 2021 in File No. ER-2022-0141.

5. While the true-up amount is an under-recovery of \$2,191,826, once RP35 interest of \$(813,522) is applied to the true-up amount, there is an under-recovery of \$1,378,304, which is to be recovered from customers.

6. Staff verified that Ameren Missouri filed its 2020 annual report and is not delinquent on any assessment. 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). Other than as noted in the attached Staff *Memorandum*, Staff is not aware of any other matter before the Commission that affects or is affected by this true-up filing.

WHEREFORE, Staff recommends the Commission approve Ameren Missouri's RP35 true-up filing for the billing months of February 2021 through September 2021, during which Ameren Missouri under-recovered \$2,191,826, without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 38th Accumulation Period of its Fuel Adjustment Clause in File No. ER-2022-0141.

Respectfully Submitted,

/s/ Karen E. Bretz

Karen E. Bretz

Deputy Counsel

Missouri Bar No. 70632

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Missouri Public Service Commission

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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 23rd day of December, 2021.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2022-0142
Union Electric Company, d/b/a Ameren Missouri

FROM: Amanda C. Conner, Utility Regulatory Auditor

DATE: /s/ Amanda C. Conner 12/23/2021 /s/ Karen Bretz 12/23/2021
Energy Resources Department / Date Staff Counsel's Office / Date

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

DATE: December 23, 2021

On November 24, 2021, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-fifth 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 J. Neil Graser, Manager of Power and Fuels Accounting at Ameren Services Company.

The true-up amount, without interest, of \$2,191,826 as identified in this filing is the result of an under-recovery during Recovery Period 35 ("RP35")¹. RP35 was the billing months of February 2021 through September 2021. RP35 is the recovery period for and following Accumulation Period 35 ("AP35")². AP35 was the accumulation months of June 2020 through September 2020. On page 4 lines 3 through 10 of his direct testimony, Company witness J. Neil Graser states regarding the under-recovery:

There was an under-recovery of \$2,191,826 from customers for the 35th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be refunded for the subject Accumulation Period of \$813,522, 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 35th Recovery Period of \$1,378,304. Schedule JG-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

¹ Recovery Period 35 is February 2020 through September 2021.

² Accumulation Period 35 is June 2020 through September 2020.

The true-up amount³ without interest for RP35 of \$2,191,826⁴ and the interest amount for RP35 of \$(813,522) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 38 (“AP38”) adjustment filing, also filed on November 24, 2021, in File No. ER-2022-0141, in compliance with Ameren Missouri’s FAC.⁵

Staff examined Mr. Graser’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 them.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP35 true-up filing for the billing months of February 2021 through September 2021 as shown in the table below:

RP 35 True-Up filing	\$2,191,826
Accrued Interest	\$(813,522)
Total True-Up Amount for RP 35 (under-collected)	\$1,378,304

Staff verified that Ameren Missouri filed its 2020 annual report and is not delinquent on any assessment. Ameren Missouri is current on the 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. ER-2022-0141, as noted herein.

³ See tab 1 (Summary) of [schedule jg-tu 35 conf](#) attached to the direct testimony of J. Neil Graser for calculation of the RP35 true-up amount.

⁴ This true-up amount is an under-recovery.

⁵ Union Electric Company’s Schedule No. 6, Original Sheet No. 71.9: “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

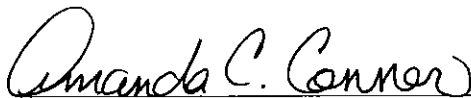
In the Matter of the Adjustment of Union)
Electric Company d/b/a Ameren Missouri's) File No. EO-2022-0142
Fuel Adjustment Clause for the 38th)
Accumulation Period)

AFFIDAVIT OF AMANDA C. CONNER

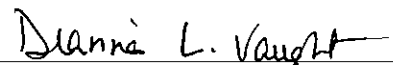
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Amanda C. Conner, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *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 C. Conner

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 23rd day of December, 2021.


Notary Public

