

**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	)	<b><u>File No. EO-2022-0263</u></b>
Adjustment Clause for the 36 <sup>th</sup> Recovery Period	)	Tariff No. YE-2022-0241

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING**

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

1. On March 30, 2022, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 36<sup>th</sup> fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On April 5, 2022, the Commission ordered Staff to file a recommendation by April 29, 2022.

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri's true-up filing for its 36<sup>th</sup> Recovery Period ("RP36") (billing months of June 2021 through January 2022), during which Ameren Missouri under-recovered \$2,003,492, without interest, from its customers. Staff's analysis is contained in the attached *Memorandum*, attached as Appendix A.

4. The under-recovered amount of \$2,003,492, without interest, which is the true-up amount for RP36, and interest to be refunded for RP36 of \$436,170, are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 39<sup>th</sup> Accumulation Period ("AP39") adjustment filing, also filed on March 30, 2022, in File No. ER-2022-0262.

5. While the true-up amount is an under-recovery of \$2,003,492, once RP36 interest of \$436,170 is applied to the true-up amount, there is an under-recovery of \$2,439,662, which is to be recovered from customers.

6. Staff verified that Ameren Missouri filed its 2021 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 RP36 true-up filing for the billing months of June 2021 through January 2022, during which Ameren Missouri under-recovered \$2,003,492, without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 39<sup>th</sup> Accumulation Period of its Fuel Adjustment Clause in File No. ER-2022-0262.

Respectfully Submitted,

**/s/ Carolyn H. Kerr**

Carolyn H. Kerr

Senior Counsel

Missouri Bar No. 45718

Attorney for the Staff of the

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 25<sup>th</sup> day of April, 2022.

**/s/ Carolyn H. Kerr**

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File  
File No. EO-2022-0263  
Union Electric Company, d/b/a Ameren Missouri

**FROM:** Cynthia M. Tandy, Senior Utility Regulatory Auditor

/s/ Cynthia M. Tandy 04/25/2022      /s/ Carolyn Kerr 04/25/2022  
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-Sixth Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

**DATE:** April 25, 2022

On March 30, 2022, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-sixth 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 \$2,003,492 as identified in this filing is the result of an under-recovery during Recovery Period 36 ("RP36"). RP36 was the billing months of June 2021 through January 2022. RP36 is the recovery period for and following Accumulation Period 36 ("AP36"). AP36 was the accumulation months of October 2020 through January 2021. 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 \$2,003,492 from customers for the 36<sup>th</sup> Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105<sup>1</sup> data. After applying the interest to be recovered for the subject Accumulation Period of \$436,170, 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 36<sup>th</sup> Recovery Period of \$2,439,662. Schedule JG-TU to this testimony contains the details of the calculation that produce the net amount to be recovered from customers.

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<sup>1</sup> Generation data based on the available 105 day settlement.

The true-up amount<sup>2</sup> without interest for RP36 of \$2,003,492<sup>3</sup> and the interest amount for RP36 of \$436,170 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 39 (“AP39”) adjustment filing, also filed on March 30, 2022, in File No. ER-2022-0262, in compliance with Ameren Missouri’s FAC.<sup>4</sup>

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 RP36 true-up filing for the billing months of June 2021 through January 2022 as shown in the table below:

RP 36 True-Up filing	\$2,003,492
Accrued Interest	\$ 436,170
Total True-Up Amount for RP 36 (under-collected)	\$2,439,662

Staff verified that Ameren Missouri filed its 2021 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-2022-0262, as noted herein.

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<sup>2</sup> See tab 1 (Summary) of schedule jg-tu 36 conf attached to the direct testimony of J. Neil Graser for calculation of the RP36 true-up amount.

<sup>3</sup> This true-up amount is an under-recovery.

<sup>4</sup> 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**

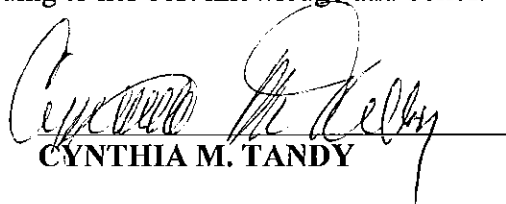
In the Matter of the True-Up of Union )  
Electric Company d/b/a Ameren Missouri's ) File No. EO-2022-0263  
Fuel Adjustment Clause for the 36<sup>th</sup> )  
Accumulation period. )

**AFFIDAVIT OF CYNTHIA M. TANDY**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW CYNTHIA M. TANDY** 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.

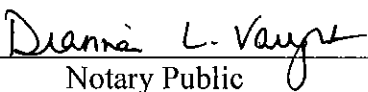
Further the Affiant sayeth not.

  
CYNTHIA M. TANDY

**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 April, 2022.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2023  
Commission Number: 15207377

  
Notary Public