

**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 Adjustment) **File No. ER-2021-0024**
Adjustment Clause for the 31st Recovery Period) Tariff No. YE-2021-0014

STAFF RECOMMENDATION

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

1. On July 31, 2020 Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its 31st fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On July 31, 2020 the Commission ordered Staff to file a recommendation by August 31, 2020.

3. Based on its examination and analysis of the information Ameren Missouri filed and submitted, Staff recommends the Commission approve Ameren Missouri’s true-up filing for the 31st Recovery Period (“RP31”) (billing months of October 2019 through May 2020), during which Ameren Missouri over-recovered \$233,028, without interest, from its customers. Staff’s analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The over-recovered amount of \$233,028, without interest, which is the true-up amount for RP31, and interest for RP31 of \$548,035, are both included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in Ameren Missouri’s 34th Accumulation Period (“AP34”) adjustment filing, also filed on July 31, 2020 in File No. ER-2021-0022.

5. While the true-up amount is an over-recovery of \$233,028, once RP31 interest of \$548,035 is applied to the true-up amount, there is an under-recovery of \$315,007, which is to be collected from customers. Ameren Missouri's witness, J. Neil Graser explained this in his August 25, 2020 response to Staff Data Request 0001:

The true-up filing includes an over-recovery for Factor TUP of (\$233,028) and interest calculated as part of Factor I of \$548,035. The total net adjustment of \$315,007 is an under-recovery that is to be collected from customers.

6. Staff verified that Ameren Missouri filed its 2019 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 RP 31 true-up filing for the billing months of October 2019 through May 2020, during which Ameren Missouri over-recovered \$233,028, without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 34th Accumulation Period of its Fuel Adjustment Clause in File No. ER-2021-0022.

Respectfully Submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 31st day of August, 2020.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2021-0024
Union Electric Company d/b/a Ameren Missouri

FROM: Lisa Wildhaber, Senior Utility Regulatory Auditor
Cynthia M. Tandy, Utility Regulatory Auditor

/s/ Brad J. Fortson 08/31/2020 /s/ Karen Bretz 08/31/2020
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-First Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: August 31, 2020

On July 31, 2020, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-first 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 \$(233,028) as identified in this filing is the result of an over-collection during Recovery Period 31 ("RP31"). RP31 was the billing months of October 2019 through May 2020. RP31 is the recovery period for and following Accumulation Period 31 ("AP31"). AP31 was the accumulation months of February 2019 through May 2019. On page 4 lines 1 through 8 of his direct testimony, Company Witness J. Neil Graser states regarding the over-collection:

There was an over-recovery of \$233,028 from customers for the 31st Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be collected for the subject Accumulation Period of \$548,035, 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 31st Recovery Period of \$315,007. Schedule JG-TU 31 to this testimony contains the details of the calculation that produce the total amount to be refunded to customers.

In his August 25, 2020 response to Staff's Data Request 0001, Mr. Graser clarified his testimony to state that the net recovery, after interest is applied to the true-up amount, is an under-recovery:

This true-up filing includes an over-recovery for Factor TUP of (\$233,028) and interest calculated as part of Factor I of \$548,035. The total net adjustment of \$315,007 is an under-recovery that is to be collected from customers. To clarify, my testimony (at page 4, line 8) would have been clearer had it read (changes underlined):

Schedule JG-TU 31 to this testimony contains the details of the calculation that produce the net amount to be collected from customers.

The true-up amount¹ without interest for RP31 of \$(233,028)² and the interest amount for RP31 of \$548,035 are included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") for the Company's Accumulation Period 34 ("AP34") adjustment filing, also filed on July 31, 2020, in File No. ER-2021-0022, in compliance with Ameren Missouri's FAC.³

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 RP31 true-up filing for the billing months October 2019 through May 2020 during which Ameren Missouri (1) over-collected \$(233,028) from its customers, the true-up amount for RP31, and (2) accrued interest of \$548,035. As stated above, this results in a total under-recovery from customers for RP31 of \$315,007.

Staff verified that Ameren Missouri filed its 2019 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-2021-0022, as noted herein.

¹ See tab 1 (Summary) of schedule jg-tu 31 conf attached to the direct testimony of J. Neil Graser for calculation of the RP31 true-up amount.

² This true-up amount is an over-collection.

³ 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 Fuel)
Adjustment Clause for the 31st Recovery)
Period)

Case No. ER-2021-0024

**AFFIDAVIT OF LISA WILDHABER
AND CYNTHIA M. TANDY**

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW Lisa Wildhaber and Cynthia M. Tandy, on their oath declare that they are of sound mind and lawful age; that they contributed to the foregoing *Staff Memorandum*; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further your Affiants sayeth not.

/s/ Lisa Wildhaber
Lisa Wildhaber

/s/ Cynthia M. Tandy
Cynthia M. Tandy