

**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-2021-0160</u>
Adjustment Clause for the 32nd Recovery Period)	Tariff No. JE-2021-0132

STAFF RECOMMENDATION

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

1. On December 3, 2020 Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 32nd fuel adjustment clause true-up filing under the provisions of 20 CSR 4240-20.090(9).

2. On December 4, 2020 the Commission ordered Staff to file a recommendation by December 31, 2020.

3. Based on its analysis of the information Ameren Missouri filed, Staff recommends the Commission approve Ameren Missouri's true-up filing for the 32nd Recovery Period ("RP32") (billing months of February 2020 through September 2020), during which Ameren Missouri under-recovered \$336,760, without interest, from its customers. Staff's analysis is contained in the attached Staff Memorandum, marked as Appendix A.

4. The under-recovered amount of \$336,760, without interest, which is the true-up amount for RP32, and interest for RP32 of \$(843,645), are both included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in Ameren Missouri's 35th Accumulation Period ("AP35") adjustment filing, also filed on December 3, 2020 in File No. ER-2021-0159.

5. While the true-up amount is an under-recovery of \$336,760, once RP32 interest of \$(843,645) is applied to the true-up amount, there is an over-recovery of \$(506,885), which is to be refunded to 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 RP32 true-up filing for the billing months of February 2020 through September 2020, during which Ameren Missouri under-recovered \$336,760, without interest, from its customers, for inclusion in its Fuel Adjustment Rate for the 35th Accumulation Period of its Fuel Adjustment Clause in File No. ER-2021-0159.

Respectfully Submitted,

/s/ Karen E. Bretz

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 on this 31st day of December, 2020.

/s/ Karen Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2021-0160
Union Electric Company, d/b/a Ameren Missouri

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

DATE: /s/ Brad J. Fortson 12/31/2020 /s/ Karen Bretz 12/31/2020
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-Second Fuel Adjustment Clause True-up Filing Under the Provisions of 20 CSR 4240-20.090(9).

DATE: December 31, 2020

On December 3, 2020, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") its thirty-second 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 \$336,760 as identified in this filing is the result of an under-recovery during Recovery Period 32 ("RP32"). RP32 was the billing months of February 2020 through September 2020. RP32 is the recovery period for and following Accumulation Period 32 ("AP32"). AP32 was the accumulation months of June 2019 through September 2019. 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 \$336,760 from customers for the 32nd 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 \$843,645, 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 over-recovery from customers for the 32nd Recovery Period of \$506,885. Schedule JG-TU to this testimony contains the details of the calculation that produce the net amount to be refunded to customers.

The true-up amount¹ without interest for RP32 of \$336,760² and the interest amount for RP32 of \$(843,645) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) for the Company’s Accumulation Period 35 (“AP35”) adjustment filing, also filed on December 3, 2020, in File No. ER-2021-0159, 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 RP32 true-up filing for the billing months February 2020 through September 2020 during which Ameren Missouri (1) under-recovered \$336,760 from its customers, the true-up amount for RP32, and (2) accrued interest of \$(843,645). As stated above, this results in a total over-collected from customers for RP32 of \$(506,885).

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-2021-0159, as noted herein.

¹ See tab 1 (Summary) of schedule jg-tu 32 conf attached to the direct testimony of J. Neil Graser for calculation of the RP32 true-up amount.

² This true-up amount is an under-recovery.

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.

