

Exhibit No.:  
Issues: Adjustment to FAC Rate – Forty-  
Ninth Accumulation Period  
Witness: Raysene Logan  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Union Electric Co.  
Case No.: ER-2026-\_\_\_\_\_  
Date Testimony Prepared: July 28, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. ER-2026-\_\_\_\_\_**

**DIRECT TESTIMONY**

**OF**

**RAYSENE LOGAN**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**D/B/A AMEREN MISSOURI**

**St. Louis, Missouri**

**July, 2025**

**DIRECT TESTIMONY**

**OF**

**RAYSENE LOGAN**

**Case No. ER-2026-\_\_\_\_\_**

1   **Q:     Please state your name and business address.**

2   A:     My name is Raysene Logan. My business address is One Ameren Plaza, 1901 Chouteau  
3           Ave., St. Louis, Missouri.

4   **Q:     By whom and in what capacity are you employed?**

5   A:     I am employed by Ameren Services Company (“Ameren Services”) as Manager, Power  
6           and Fuels Accounting. Ameren Services provides various corporate support services to  
7           Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”),  
8           including settlement and accounting related to fuel, purchased power, and off-system sales.

9   **Q:     What is the purpose of your testimony?**

10  A:     My testimony supports the 7<sup>th</sup> Revised Sheet No. 71.32 of Ameren Missouri’s Schedule  
11          No. 6 – Schedule of Rates for Electric Service, that is being filed by Ameren Missouri to  
12          adjust customer rates for changes in Ameren Missouri’s fuel and purchased power costs,  
13          net off-system sales revenues, and associated transportation (i.e., Actual Net Energy Costs,  
14          or “ANEC”), which were experienced during the four-month period February 2025 through  
15          May 2025.<sup>1</sup>

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<sup>1</sup> This four-month period is the forty-ninth overall Accumulation Period under Ameren Missouri’s Rider FAC, which was first approved by the Commission in Case No. ER-2008-0318, and which has subsequently been re-authorized, with certain modifications, in Case Nos. ER-2010-0036, ER-2011-0028, ER-2012-0166, ER-2014-0258, ER-2016-0179, ER-2019-0335, ER-2021-0240, ER-2022-0337, and ER-2024-0319.

1 **Q: Please explain why Ameren Missouri is filing a revision to its Rider FAC at this time.**

2 A: The Commission’s rule governing fuel and purchased power cost recovery mechanisms for  
3 electric utilities – specifically 20 CSR 4240-20.090(8) – and Ameren Missouri’s Rider FAC,  
4 require Ameren Missouri to make periodic filings to adjust customer rates for changes in  
5 Ameren Missouri’s ANEC experienced during each Accumulation Period<sup>2</sup> as compared to  
6 the base level of net energy costs (Factor “B” as listed in the Company’s Rider FAC tariff)  
7 applicable to that same Accumulation Period. That change is to then be reflected in an  
8 adjustment to the Rider FAC Fuel Adjustment Rate (i.e., Factor “FAR” in Rider FAC).  
9 This adjustment can be positive (a FAR of greater than zero) or negative (a FAR of less  
10 than zero). The Commission’s rule requires at least one such review and adjustment each  
11 year. Ameren Missouri’s approved FAC tariff calls for three filings annually – one filing  
12 covering each of the three four-month Accumulation Periods reflected in Rider FAC. The  
13 changes in the FAR implemented in these three filings are then collected from or refunded  
14 to customers over the applicable Recovery Period. The Recovery Period applicable to this  
15 filing will consist of the calendar months of October 2025 through May 2026.

16 **Q: What adjustment is being made in this filing?**

17 A: During the February 1, 2025 to May 31, 2025 Accumulation Period, Ameren Missouri’s  
18 ANEC was \$152,341,180 which was an increase of \$23,168,655 as compared to Factor B,  
19 which was \$129,172,525 for that same period. The primary factors driving this increase  
20 above net base energy costs (Factor B) were higher fuel and purchased power costs for load  
21 and lower off-system sales margins, partially offset by higher net capacity sales revenue as  
22 compared to Factor B. The higher fuel and purchased power costs for load are primarily

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meaning given them in Rider FAC.

1 due to the extended Callaway refuel outage in April and May and a period of extreme cold  
2 in February necessitating MISO net purchases at higher prices. The lower off-system sales  
3 margins are also due to the extended Callaway refuel outage in April and May. The higher  
4 net capacity sales revenue is due to favorable financial transmission rights management.  
5 Also included in this filing is the true-up amount reflected in the Company's forty-sixth  
6 true-up filing, which is being filed concurrently with the initiation of this docket. The  
7 above results in a Fuel and Purchased Power Adjustment ("FPA") of \$17,538,889 which,  
8 as described further below, will produce the FAR rates that will appear as a separate line  
9 item to be applied to customers' bills during the 49<sup>th</sup> Recovery Period that starts with the  
10 first calendar day of October 2025.

11 **Q: Please further describe the impact of the change in the FAR on the Company's**  
12 **customers.**

13 A: The \$23,168,655 increase above ANEC during the 49<sup>th</sup> Accumulation Period as compared  
14 to Factor B for that Accumulation Period was calculated in the manner specified in the  
15 Company's Rider FAC, and adjusted for voltage level differences, as provided for in Rider  
16 FAC. Applying the 95% sharing ratio, the true-up amount of (\$7,671,463) from the forty-  
17 sixth true-up filing (made concurrently with the initiation of this docket) and the applicable  
18 recovery of interest totaling \$3,200,130 as provided for in Rider FAC (which includes the  
19 recovery of \$212,674 in interest for Accumulation Period 49 and the recovery of  
20 \$2,987,456 in interest for the true-up of Accumulation Period 46), the total adjustment to  
21 be reflected in the FAR is \$17,538,889. That total, when using the estimated kilowatt-hour  
22 ("kWh") sales for the October 2025 to May 2026 Recovery Period, results in the following

FAR amounts for the Company's customers during that Recovery Period, beginning with the first calendar day of October 2025:

<u>Customer Voltage Level</u>	<u>Cents per kWh Adjustment</u>
Secondary	0.330 ¢/kWh
Primary	0.320 ¢/kWh
High Voltage	0.314 ¢/kWh
Transmission	0.310 ¢/kWh

Filed concurrently with my direct testimony is the tariff sheet that contains the formula that Ameren Missouri used to calculate the FAR. Also included in the tariff sheet are the values for each element of the formula that were used to derive the FAR. Assuming 1,007 kWh of usage per month for the average residential customer, this will result in a charge under the FAR of approximately \$3.32 per month. This is a decrease from the FAR currently in effect, which resulted in a charge for the average residential customer of approximately \$3.67 per month. The primary factor driving this change in the FAR are differences in the true-up amounts reflected in each filing due to the proration of rates. In the true-up for Accumulation Period 46 there were prorated Accumulation Period 45 recoveries included resulting in a larger over recovery for Accumulation Period 46. Additionally, there were higher net capacity sales revenue and higher off-system sales margins, mostly offset by higher fuel and purchased power costs in Accumulation Period 49 as compared to Accumulation Period 47 and the net base energy costs applicable to each period. The higher net capacity sales revenue is primarily a result of favorable financial transmission rights management and higher volumes being available for sale in Accumulation Period 49 as compared to Accumulation Period 47 and the net base energy costs for each period. The

1 higher off-system sales margins are primarily a result of higher locational marginal prices  
2 "LMPs" in Accumulation Period 49 as compared to Accumulation Period 47 and the net  
3 base energy costs for each period. The higher fuel and purchased power costs are primarily  
4 due to the extended Callaway refuel outage during April and May in Accumulation Period  
5 49, amplified by the extreme cold in February that necessitated MISO net purchases at  
6 higher prices.

7 **Q: Having addressed the primary factors driving ANEC for Accumulation Period 49,**  
8 **can you please explain how you developed the various values used to derive the**  
9 **proposed FAR shown on the tariff sheet?**

10 A: The data upon which Ameren Missouri based the values for each of the variables in the  
11 approved FAR formula is shown in Schedule RL-FAR. This schedule contains all the  
12 information that is required by 20 CSR 4240-20.090(8), and the work papers that support  
13 the data contained in Schedule RL-FAR. I have also included Schedule RL-TU, which is  
14 a reproduction of Schedule RL-TU filed in the separate true-up docket for the forty-sixth  
15 Recovery Period, which as earlier noted is being filed concurrently with the initiation of  
16 this docket.

17 **Q: If the rate schedule filed by Ameren Missouri is approved or allowed to go into effect,**  
18 **what safeguards exist to ensure that the revenues the Company collects do not exceed**  
19 **the net energy costs that Ameren Missouri actually incurred during the Accumulation**  
20 **Period?**

21 A: Ameren Missouri's Rider FAC and the Commission's rules provide two mechanisms to  
22 ensure that amounts collected from customers do not exceed Ameren Missouri's actual,  
23 prudently-incurred ANEC. First, Rider FAC and the Commission's rules require a true-up

1 of the amounts collected from customers through Rider FAC, with any excess/unrecovered  
2 amounts to be refunded/billed to customers through prospective adjustments to the FAR  
3 calculation, with interest at Ameren Missouri's short-term borrowing rate. Second, Ameren  
4 Missouri's ANEC are subject to periodic prudence reviews to ensure that only prudently-  
5 incurred net energy costs are collected from customers through Ameren Missouri's Rider  
6 FAC. These two mechanisms serve as checks that ensure that the Company's customers  
7 pay only the prudently-incurred ANEC and no more.

8 **Q: What action is Ameren Missouri requesting from the Commission with respect to the**  
9 **rate schedule that the Company has filed?**

10 A: As provided by 20 CSR 4240-20.090(8) the Commission Staff (the "Staff") has thirty (30)  
11 days from the date the revised FAC rate schedule is filed to conduct a review and to make  
12 a recommendation to the Commission as to whether the rate schedule complies with the  
13 Commission's rules, the requirements of Section 386.266, RSMo (Cum. Supp. 2025), and  
14 Ameren Missouri's approved Rider FAC. If the Commission finds the revised Rider FAC  
15 rate schedule does comply, the FAR will take effect either pursuant to a Commission order  
16 approving the FAR or by operation of law, in either case within 60 days after the FAR is  
17 filed. Because Ameren Missouri believes its filing satisfies all of the requirements of  
18 applicable statutes, the Commission's rules and Ameren Missouri's approved Rider FAC,  
19 Ameren Missouri requests that after the Staff's review, the Commission approve the FAR  
20 or otherwise allow it to take effect by operation of law to be effective on October 1, 2025.

21 **Q: Does this conclude your direct testimony?**

22 A: Yes, it does.

In the Matter of the Adjustment of Union Electric Company )  
d/b/a Ameren Missouri's Fuel Adjustment Clause for the ) File No. ER-2026-  
49th Accumulation Period. )

**STATE OF MISSOURI**               )  
  ) ss  
**CITY OF ST. LOUIS**             )

3. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

Sworn this 25 day of July, 2025.