

**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-2015-0021**
Clause for the 13th Recovery Period)

STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 13TH RECOVERY PERIOD

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its recommendation respectfully states:

1. On July 25, 2014, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a true-up to its Fuel Adjustment Clause (“FAC”) to identify the amount of over- or under-recovery during the previous 8-month FAC recovery period, as required by the provisions of its FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. The true-up amount for the 13th Recovery Period identified in this case is included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in the Company’s 16th Accumulation Period fuel adjustment rates (“FAR”) filing in File No. ER-2015-0022, also filed on July 25.

3. On July 25, the Commission ordered Staff to file a recommendation regarding its examination and analysis of the true-up filing by no later than August 24, 2014, as required by Commission Rule 4 CSR 240-20.090(5)(D).

4. Rule 4 CSR 240-20.090(5)(D) also requires the Commission to issue an order deciding the true-up within 60 days of Ameren Missouri's filing, or, if no order is

issued, the rule provides that the tariff schedules and rate adjustments shall take effect by operation of law 60 days after filing.

5. As explained in Staff's *Memorandum*, attached here as Appendix A and incorporated by reference, Staff recommends that the Commission approve Ameren Missouri's true-up filing for the 13th Recovery Period.

6. Staff reviewed and analyzed the direct testimony and supporting schedules of Ameren Missouri witness Erik C. Wenberg. Staff found that Ameren Missouri's calculations for the true-up amounts and interest for the 13th Recovery Period (the billing months October 2013 through May 2014) are correct. The 13th Recovery Period's over-collected amount of \$2,611,772¹ and interest amount of \$110,253 are included in Ameren Missouri's calculation of its requested current period FARs in File No. ER-2015-0022, also filed July 25, 2014.

7. Staff has verified that Ameren Missouri filed its 2013 annual report and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring Report as required by 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. ER-2015-0022 noted above.

¹ This amount includes accumulated interest as specified on Original Sheet No. 98.30: TRUE-UP After completion of each RP, the Company shall make a true-up filing on the same day as its FAR filing. Any true-up adjustments shall be reflected in T above. Interest on the true-up adjustment will be included in I above.

WHEREFORE, Staff submits its analysis of the Company's true-up filing and recommends that the Commission approve Ameren Missouri's true-up filing for the 13th Recovery Period, under the provisions of the Company's FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully Submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 22nd day of August, 2014.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2015-0021
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Matthew J. Barnes, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 08/22/2014 /s/ Bob Berlin 08/22/2014
Energy Resource Analysis Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company d/b/a Ameren Missouri's Thirteenth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: August 22, 2014

On July 25, 2014, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") in the form of direct testimony and supporting schedules by Erik C. Wenberg, its thirteenth true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets, 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount of \$(2,611,772) identified in this filing is the result of an over-collection during Recovery Period 13 ("RP13") that includes the billing months of October 2013 through May 2014. RP13 is the recovery period for and following Accumulation Period 13 ("AP13") that includes the period of February 1, 2013 through May 31, 2013.

The true-up amount¹ for RP13, with an interest amount of \$110,253, is included the calculation of the Fuel and Purchased Power Adjustment ("FPA"). This amount is included in the Company's Accumulation Period 16 ("AP16") adjustment filing, also filed on July 25, 2014, in File No. ER-2015-0022, in compliance with Ameren Missouri's FAC.²

¹ See Page 1 of 5 of Schedule EW-TU of the direct testimony of Erik C. Wenberg for calculation of the RP13 true-up adjustment with interest amount.

² Union Electric Company's Schedule No. 5, Original Sheet No. 72.8: "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 item T 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."

Staff examined the direct testimony of Erik C. Wenberg, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly information Ameren Missouri has 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 RP13 true-up filing for the billing months October 2013 through May 2014 during which Ameren Missouri over-collected \$2,611,772 from its customers for inclusion in the calculation of the FPA amount included in the Company's AP16 adjustment filing in File No. ER-2015-0022.

Staff has verified that Ameren Missouri has filed its 2013 annual report and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except as noted herein.

