

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a Ameren )  
Missouri for Authority to Implement Rate Adjustments ) **File No. ER-2015-0128**  
Required by 4 CSR 240-2.090(4) and the Company's ) **Tariff No. YE-2015-0209**  
Approved Fuel and Purchased Power Cost Recovery )  
Mechanism. )

**STAFF RESPONSE TO THE OFFICE OF THE PUBLIC COUNSEL'S  
REQUEST TO EXCLUDE CHARGE**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its response to the Request to Exclude Charge submitted by the Office of the Public Counsel ("OPC") on December 23, 2014, states as follows:

1. On November 21, 2014, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") submitted a proposed tariff sheet designed to implement an adjustment to its Fuel and Purchased Power Adjustment Clause for the accumulation period ending September 30, 2014. The proposed tariff sheet bears an effective date of January 27, 2015.

2. On December 19, Staff filed its recommendation to approve the revised tariff sheet Ameren Missouri filed on November 21.

3. On December 23, OPC filed a Request to Exclude Charge. The Commission subsequently filed an order directing Staff to respond no later than January 6, 2015.

4. Staff's *Memorandum*, attached hereto as Appendix A and incorporated by reference, recommends the Commission deny OPC's Request to Exclude Charge as filed on December 23, 2014.

5. As explained in Staff's *Memorandum*, there is no evidence of any \*\* [REDACTED] \*\* costs or revenues flowing through the Ameren Missouri Fuel Adjustment Clause ("FAC").

6. In \*\* [REDACTED] \*\* Ameren Missouri added language to its FAC monthly report as required by its Rider FAC. The new language indicated that \*\* [REDACTED] \*\*  
[REDACTED]  
[REDACTED] \*\*

7. Staff analyzed each monthly report back to \*\* [REDACTED] \*\* and found no evidence that Ameren Missouri has been flowing \*\* [REDACTED] \*\* costs or revenues through its FAC or that it violated its Rider FAC.

8. Staff verified its analysis with the Company. The Company advised Staff that the new language was added merely as a courtesy notification of a potential new charge type, because Ameren Missouri believed new \*\* [REDACTED] \*\* costs or revenues may apply at some time in the future.

**WHEREFORE**, Staff recommends the Commission deny OPC's Request to Exclude Charge, as filed on December 23, 2014.

Respectfully Submitted,

**/s/ Marcella L. Mueth**

Marcella L. Mueth

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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 5<sup>th</sup> day of January, 2015.

**/s/ Marcella L. Mueth**

**MEMORANDUM**

TO: Missouri Public Service Commission Official Case File  
File No. ER-2015-0128, Tariff Tracking No. YE-2015-0209  
Union Electric Company d/b/a Ameren Missouri

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

/s/ John Rogers      01/05/15                      /s/ Marcella Mueth      01/05/15  
Energy Resource Analysis Unit / Date              Staff Counsel's Office / Date

SUBJECT: Staff Response to *The Office of the Public Counsel's Request to Exclude Charge*.

DATE: January 5, 2015

On December 23, 2014, the Office of the Public Council ("OPC") filed *The Office of the Public Counsel's Request to Exclude Charge* ("Request to Exclude Charge") in which OPC "asks the Commission to issue an order excluding the \*\* \_\_\_\_\_ \*\* charge type from this FAR filing and order that any such costs [be] refunded or revenues retained as is just and reasonable." On December 29, 2014, the Missouri Public Service Commission ("Commission") ordered Ameren Missouri and Staff to respond to OPC's pleading by January 6, 2015. Staff reviewed the direct testimony of Ameren Missouri witness Erik C. Wenberg and work papers for Accumulation Periods 16<sup>1</sup> and 17,<sup>2</sup> as well as Ameren Missouri's monthly information submitted in compliance with 4 CSR 240-3.161(5) for the months of February 2014 through September 2014. Staff finds no evidence of any \*\* \_\_\_\_\_ \*\* costs or revenues flowing through the Ameren Missouri Fuel Adjustment Clause ("FAC"). Staff recommends the Commission deny OPC's Request to Exclude Charge as filed on December 23, 2014.

In \*\* \_\_\_\_\_ \*\* Ameren Missouri added the following language to its FAC monthly report<sup>3</sup> as required by Ameren Missouri's Rider FAC:<sup>4</sup>

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<sup>1</sup> Accumulation Period 16 included February 2014 through May 2014.

<sup>2</sup> Accumulation Period 17 included June 2014 through September 2014.

<sup>3</sup> Ameren Missouri FAC Reporting \*\* \_\_\_\_\_ \*\* HC Change Log p1 and p2.

<sup>4</sup> Union Electric Company, MO.P.S.C. Schedule No. 6, Original Sheet No. 72.5 paragraph B: "The Company will include in its monthly reports required by the Commission's fuel adjustment clause rules notice of the new charge type no later than 60 days prior to the Company including the new charge type cost or revenue in a FAR filing."

\*\* \_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_ \*\*

OPC claims that \*\* \_\_\_\_\_ \*\* costs or revenues have been flowing through Ameren Missouri's FAC and the Company violated its FAC tariff sheet since it failed to meet any of the three requirements for sufficient notice of the new charge type as required by Ameren Missouri's Rider FAC. The three requirements for sufficient notice of the new charge type are: 1) identify the proposed accounts affected; 2) provide a description of the charge type; and 3) identify the preexisting market settlement charge type(s) which the charge type replaces or supplements.

Staff analyzed each monthly report back to \*\* \_\_\_\_\_ \*\* and found no evidence that Ameren Missouri has been flowing \*\* \_\_\_\_\_ \*\* costs or revenues through its FAC or that it violated its Rider FAC. Staff verified with the Company that Staff's analysis is accurate. The Company advised Staff that the new language was added to the \*\* \_\_\_\_\_ \*\* monthly report merely as a courtesy notification of a potential new charge type, because Ameren Missouri believed new \*\* \_\_\_\_\_ \*\* costs or revenues may apply at some time in the future. Ameren Missouri advised Staff that it does not know which FERC accounts the new charge type(s) will be booked in until the month it actually incurs the new charge.

Staff recommends the Commission deny OPC's Request to Exclude Charge as filed on December 23, 2014.

**NP**



