

**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)	<u>Case No. ER-2016-0129</u>
Fuel Adjustment Clause for)	
The 17 th Recovery Period)	

STAFF'S RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed an application for its 17th Fuel Adjustment Clause True-Up filing, November 25, 2015, with an effective date of January 27, 2015. Ameren Missouri's application would result in an adjustment to the amount collected through its fuel adjustment clause (FAC) due to under-collection. Recovery Period 17 included the billing months of February 2015 through September 2015 and followed Accumulation Period 17 including the period of June 1, 2014, through September 30, 2014. The Commission ordered Staff to conduct a review and file its Recommendation no later than December 25, 2015. Because December 25th was a state holiday, Staff is filing its Recommendation on the next work day, December 28, 2015.

2. Commission Rule 4 CSR 240-20.090(5)(D) sets forth that following receipt of Staff's Recommendation, the Commission should either approve, reject or suspend the filing within 60 days or the tariff and FAC rate adjustments will take effect. Rule 4 CSR 240-3.161(8) sets forth the filing requirements for an electric utility filing a true-up related to a rate adjustment mechanism such as an FAC

and 4 CSR 240-20.090(5) sets forth the requirements for submission of annual true-ups to remedy over or under-collection through rate adjustments or refunds.

3. *Staff's Memorandum*, including its recommendation, is attached to this pleading as Attachment A, and contains Staff's findings pursuant to its review of Ameren Missouri's submitted testimony, work papers, monthly reports, and interest calculations.

4. Staff recommends that the Commission approve Ameren Missouri's calculated adjustment of \$566,101 resulting from under-collection during Recovery Period 17 plus interest of \$730,252 resulting from Accumulation Period 17 for a total adjustment of \$1,296,353. Staff has also verified that Ameren Missouri is compliant with all applicable rules regarding reporting and assessment.

WHEREFORE, Staff recommends that the Commission approve Ameren Missouri's Recovery Period 17 True-Up Filing; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully Submitted,

/s/ Mark Johnson

Mark Johnson
Senior Counsel
Missouri Bar No. 64940
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7431 (Telephone)
(573) 751-9285 (Fax)
mark.johnson@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28th day of December, 2015, to all counsel of record.

/s/ Mark Johnson

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2016-0129
Union Electric Company d/b/a Ameren Missouri

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

DATE: /s/ John A. Rogers 12/28/2015 /s/ Mark Johnson 12/28/2015
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 Seventeenth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: December 28, 2015

On November 25, 2015, 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 seventeenth 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 without interest of \$566,101 as identified in this filing is the result of an under-collection during Recovery Period 17 ("RP17") that includes the billing months of February 2015 through September 2015. RP17 is the recovery period for and following Accumulation Period 17 ("AP17") that includes the period of June 1, 2014 through September 30, 2014. On page 4, lines 1-6, of his direct testimony, Company Witness Erik C. Wenberg states the following:

There was an under-recovery of \$566,101 from customers during the Recovery Period due to the difference between actual and estimated kWh sales described earlier and recalculations using the S105 data. After applying the interest to be recovered for the Accumulation Period of \$730,252, 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 17th Recovery Period of \$164,151.

The true-up amount¹ without interest for RP17 of \$566,101 and the interest amount for RP17 of \$730,252 are included in the calculation of the Fuel and Purchased Power

¹ See Page 1 of 5 of Schedule EW-TU of the direct testimony of Erik C. Wenberg for calculation of the RP17 true-up adjustment amounts with interest and without interest.

Adjustment (“FPA”) amount for the Company’s Accumulation Period 20 (“AP20”) adjustment filing, also filed on November 25, 2015, in File No. ER-2016-0130, in compliance with Ameren Missouri’s FAC.²

Staff examined the direct testimony of Erik C. Wenberg, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly reports 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 RP17 true-up filing for the billing months February 2015 through September 2015 during which Ameren Missouri (1) under-collected \$566,101 from its customers, the true-up amount for RP17, and (2) accrued interest of \$730,252 during RP17.

Staff has verified that Ameren Missouri has filed its 2014 annual report³ 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.

² Union Electric Company’s Schedule No. 6, Original Sheet No. 73.9 and 73.10: “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 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.”

³ Ameren Missouri filed its 2014 Annual Report on April 15, 2015.

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

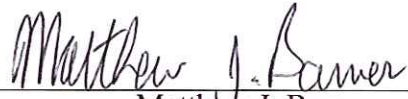
In the Matter of the True-Up of)
Union Electric Company d/b/a) File No. ER-2016-0129
Ameren Missouri's Fuel Adjustment)
Clause for the 17th Recovery Period)

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW Matthew J. Barnes and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.



Matthew J. Barnes

Subscribed and sworn to before me this 28th day of December, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086



Notary Public