In the Matter of the Adjustment	)	
of Union Electric Company	)	File No. ER-2016-0243
d/b/a Ameren Missouri's	)	Tariff No. YE-2016-0245
Fuel Adjustment Clause for	)	
the 21 <sup>st</sup> Accumulation Period	)	

# STAFF RECOMMENDATION TO APPROVE TARIFF SHEET REGARDING CHANGE TO THE FUEL ADJUSTMENT RATE FOR ACCUMULATION PERIOD 21

**COMES NOW** the Staff of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its recommendation to approve the tariff sheet, states as follows:

- 1. On March 24, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed a proposed tariff sheet, 3<sup>rd</sup> Revised Sheet No. 73.11, with supporting direct testimony pursuant to Commission Rules 4 CSR 240-20.090(4) and 4 CSR 240-3.161(7) seeking approval to adjust the Company's Fuel Adjustment Rates ("FARs") used to calculate its Fuel Adjustment Clause ("FAC") charge billed to its customers. The proposed tariff sheet bears an effective date of May 25, 2016.
- 2. Concurrently on March 24, Ameren Missouri submitted a true-up filing in File No. ER-2016-0244 to identify the amount of over- or under-recovery during Recovery Period 18 ("RP18") prescribed by its FAC. The over- or under-recovered amount (or true-up amount) and interest amount for RP18 are used when calculating the new FARs in this case.
- 3. On March 28, the Commission ordered Staff to examine and analyze Ameren Missouri's filings in this case, and to file its recommendation no later

than April 25, 2016, as required by Rule 4 CSR 240-20.090(4). The Commission also directed that all parties to Case No. ER-2014-0258 (the general rate proceeding in which continuation of Ameren Missouri's FAC was most recently approved) be added to the service list for this case, and set an intervention date of April 11, 2016. The Commission received no applications to intervene.

- 4. Staff's *Memorandum*, attached hereto as Appendix A and incorporated herein by reference, recommends the Commission issue an order approving the proposed revised tariff sheet Ameren Missouri filed on March 24, 2016.
- 5. Commission Rule 4 CSR 240-20.090(4) states in pertinent part: (A) "An electric utility with a FAC shall file one (1) mandatory adjustment to its FAC in each true-up year coinciding with the true-up of its FAC..." The rule requires Staff "to determine if the proposed adjustment to the FAC is in accordance with the provisions of this rule, Section 386.266 RSMo and the FAC mechanism established in the most recent general rate proceeding." If so, "the commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility's filing or... the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed."
- 6. Ameren Missouri's filing in this case requests Commission approval of one tariff sheet bearing an effective date of May 25, 2016, that revises the current FARs in its FAC. The filing includes testimony and work papers of Ameren Missouri

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<sup>&</sup>lt;sup>1</sup> An electric utility may also file up to three (3) additional adjustments to its FAC within a true-up year with the timing and number of such filings to be determined in a general rate proceeding.

witness Erik C. Wenberg supporting the Company's calculation of the Fuel and Purchased Power Adjustment ("FPA").

- 7. The FPA amount is (\$13,933)<sup>2</sup>. The FPA amount<sup>3</sup> is the sum of: Customer Responsibility for Accumulation Period 21 ("AP21") equal to (\$9,160,528)<sup>4</sup> (Line 4 on 3<sup>rd</sup> Revised Sheet No. 73.11); minus Interest for AP21, RP18, and the N-Factor for AP20, equal to \$489,598 (Line 4.1 on 3<sup>rd</sup> Revised Sheet No. 73.11) which includes (\$14,849) for AP21, \$503,030 for RP18, and \$1,417 for the N-Factor for AP20; plus True-Up amount for RP18 and the N-Factor for AP20, without interest, equal to \$8,656,997 (Line 4.2 on 3<sup>rd</sup> Revised Sheet No. 73.11) which includes \$8,219,471 for RP18 and \$437,526 for the N-Factor for AP20. This True-Up amount is before the Commission for approval in pending File No. ER-2016-0244.
- 8. As explained in Staff's *Memorandum*, the FPA amount results in a Current Period FAR ("FAR<sub>21</sub>") of \$0.0000 per kWh (Line 7 on 3<sup>rd</sup> Revised Sheet No. 73.11) which, when added to the Prior Period FAR (FAR<sub>20</sub>) of (\$0.00002) per kWh (Line 8 on 3<sup>rd</sup> Revised Sheet No. 73.11), results in a proposed Fuel Adjustment Rate ("FAR") of (\$0.00002) per kWh (Line 9 on 3<sup>rd</sup> Revised Sheet No. 73.11), which is a decrease of \$0.00183 per kWh when compared to the existing FAR of \$0.00181 per kWh. Because of a difference in line losses, the FAR is adjusted for the voltage at which customers receive service.

<sup>&</sup>lt;sup>2</sup> A bracketed amount in parentheses represents a refund to customers.

<sup>&</sup>lt;sup>3</sup> 3<sup>rd</sup> Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of (\$13,933).

<sup>&</sup>lt;sup>4</sup> The customer responsibility for AP21 is equal to ninety-five percent (95%) of (\$9,642,661) (the difference between Actual Net Energy Cost ("ANEC") and Net Base Energy Cost ("B") during AP21).

9. Because the Initial Rate Component for Large Transmission voltage service of (\$0.00002) / kWh is less than \$0.00200 / kWh,<sup>5</sup> the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the Recovery Period ("RP21") FARs for each service voltage level, and the Industrial Aluminum Smelter ("IAS") Service rate class FAR is equal to that of the Large Transmission voltage level rate class.

Listed below are the proposed RP21 FARs and the difference between them for Secondary, Primary, and Large Transmission and IAS service:

	Proposed RP21 FAR	Current RP20 FAR	Difference
Secondary	(\$0.00002)/kWh	\$0.00191/kWh	\$0.00193/kWh Decrease
Primary	(\$0.00002)/kWh	\$0.00186/kWh	\$0.00188/kWh Decrease
Large Transmission	(\$0.00002)/kWh	\$0.00179/kWh	\$0.00181/kWh Decrease
IAS	(\$0.00002)/kWh	\$0.00179/ kWh	\$0.00181/kWh Decrease

Based on a monthly usage of 1,105 kWh, the proposed change to the Secondary FAR would decrease the Fuel Adjustment Charge of an Ameren Missouri residential customer's bill from \$2.11 to (\$0.02), a decrease of \$2.13 per month.

10. According to Ameren Missouri witness Erik Wenberg, "[T]he primary factor driving this decrease was higher capacity sales revenue, partially offset by the Adjustment for Reduction of Service Classification 13(M)(otherwise known as

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<sup>&</sup>lt;sup>5</sup> The Commission's Report and Order in Case No. ER-2015-0258 created a new Industrial Aluminum Smelter Rate Class for which the FAR IAS rate is capped at \$0.00200 per kWh.

the IAS class) triggered by load reductions at Noranda Aluminum, Inc.'s smelter (this adjustment is generally referred as the 'N factor adjustment')."

- 11 Staff has determined that Ameren Missouri timely filed the 3rd Revised Tariff Sheet No. 73.11 and that it complies with Commission Rule 4 CSR 240-3.161 and Ameren Missouri's FAC as defined in its FAC tariff sheets.
- 12. Staff has verified that Ameren Missouri is not delinquent on any assessment, and has filed its 2015 annual report. Ameren Missouri is current on the filing of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10) and its monthly reports 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-2016-0244 as noted herein.

**WHEREFORE**, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet, as filed on March 24, 2016, to become effective on May 25, 2016, as requested by Ameren Missouri:

#### MO.P.S.C. Schedule No. 6

3<sup>rd</sup> Revised Sheet No. 73.11 Cancelling 2<sup>nd</sup> Revised Sheet No. 73.11.

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 $<sup>^{\</sup>rm 6}$  Direct testimony of Erik C. Wenberg, page 2, line 21 through page 3, line 1.

Respectfully submitted,

#### /s/ Robert S. Berlin

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#### **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 25<sup>th</sup> day of April, 2016, to all counsel of record.

/s/ Robert S. Berlin

#### MEMORANDUM

TO: Missouri Public Service Commission Official Case File

File No. ER-2016-0243, Tariff Tracking No. YE-2016-0245

Union Electric Company d/b/a Ameren Missouri

FROM: Matthew J. Barnes, Utility Regulatory Auditor IV

David Roos, Regulatory Economist III Curtis Gateley, Utility Policy Analyst II

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates

Related to Ameren Missouri's Fuel Adjustment Clause Pursuant to the

Commission's Report and Order in File No. ER-2014-0258.

DATE: April 25, 2016

On March 24, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one (1) tariff sheet, 3<sup>rd</sup> Revised Sheet No. 73.11 bearing a proposed effective date of May 25, 2016, and cancelling 2<sup>nd</sup> Revised Sheet No. 73.11. The filed tariff sheet, 3<sup>rd</sup> Revised Sheet No. 73.11, revises Ameren Missouri's Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 21 ("AP21") which ended on January 31, 2016. Staff recommends the Missouri Public Service Commission ("Commission") approve 3<sup>rd</sup> Revised Sheet No. 73.11.

Ameren Missouri's March 24, 2016 filing includes the testimony of Ameren Missouri witness Erik C. Wenberg and associated Ameren Missouri work papers. The testimony and work papers include information and data that supports Ameren Missouri's calculation of the dollar amount of its Fuel and Purchased Power Adjustment ("FPA"). That dollar amount ("FPA Amount") is  $(\$13,933)^1$  and is reflected on line 5 of  $3^{rd}$  Revised Sheet No. 73.11. This FPA Amount results in a  $FAR_{21}^2$  of \$0.00000 per kWh, which when added to the  $FAR_{20}^3$ 

<sup>1</sup> A bracketed amount in parentheses represents a refund to the customer.

<sup>&</sup>lt;sup>2</sup> FAR<sub>RP</sub> is defined in Original Sheet No. 73.8 as "FAR Recovery Period rate component calculated to recover under- or over-collection during the Accumulation Period that ended immediately prior to the applicable filing." Since this filing occurred after the end of Accumulation Period 21, FAR<sub>RP</sub> in this recommendation is referred to as FAR<sub>21</sub>.

<sup>&</sup>lt;sup>3</sup> FAR(<sub>RP-1)</sub> is defined in Original Sheet No. 73.8 as "FAR Recovery Period rate component for the under- or over-collection during the Accumulation Period immediately preceding the Accumulation Period that ended immediately

of (\$0.00002) per kWh, results in a proposed FAR<sup>4</sup> of (\$0.00002) per kWh. The proposed FAR is \$0.00183 per kWh less than the current FAR<sup>5</sup> of \$0.00181 per kWh.

#### Adjustment for Reduction of Service Classification 12 (M) or 13 (M) Billing Determinants

Ameren Missouri's Original Sheet No. 73.4 authorizes the Company to make an adjustment to the off-system sales revenue ("OSSR") component in the Actual Net Energy Cost ("ANEC")<sup>6</sup> calculation and an adjustment to the accumulation period sales to calculate Net Base Energy Cost ("B")<sup>7</sup>. Ameren Missouri's Original Sheet No. 73.4 states:

Should the level of monthly billing determinants under Service Classifications 12 (M) or 13 (M) fall below the level of normalized 12 (M) or 13 (M) monthly billing determinants as established in Case No. ER-2014-0258, an adjustment to OSSR shall be made in accordance with the following levels:

- a) A reduction of less than 40,000,000 kWh in a given month
- No adjustment will be made to OSSR.
- b) A reduction of 40,000,000 kWh or greater in a given month
- An adjustment excluding off-system sales revenue from OSSR will be made equal to the lesser of (1) all off-system sales revenues derived from all kWh of energy sold off-system due to the entire reduction, or (2) off-system sales revenues up to the reduction of 12 (M) or 13 (M) revenues compared to normalized 12 (M) or 13 (M) revenues as determined in Case No. ER-214-0258.

In the previous Ameren FAC adjustment case, File No. ER-2016-0130 for AP20, the monthly billing determinants under Service Classification 13 (M) fell below – for the first time - the level of normalized 12 (M) or 13 (M) monthly billing determinants established in Case No. ER-2014-0258 by an amount greater than 40,000,000 kWh. However, no adjustments

prior to the application filing for  $FAR_{RP}$ ." Since this filing occurred after the end of Accumulation Period 21,  $FAR_{(RP-1)}$  in this recommendation is referred to as  $FAR_{20}$ .

<sup>&</sup>lt;sup>4</sup> FAR is defined in Original Sheet No. 73.8 as "Fuel Adjustment Rate applied to retail customer usage on a per kWh basis starting with the applicable Recovery Period following the FAR filing."  $FAR = FAR_{RP} + FAR_{(RP-1)}$ .

<sup>&</sup>lt;sup>5</sup> The \$0.00181 per kWh rate is found on line 9 of 2<sup>nd</sup> Revised Sheet No. 73.11.

<sup>&</sup>lt;sup>6</sup> ANEC = fuel costs (FC) plus purchased power costs (PP) plus net emission allowances (E) minus off-system sales revenues (OSSR) as reflected on line 1 of 3<sup>rd</sup> Revised Sheet No. 73.11.

<sup>&</sup>lt;sup>7</sup> B = Base Factor times the accumulation period sales as reflected on lines 2, 2.1 and 2.2 of 3<sup>rd</sup> Revised Sheet No. 73.11.

to  $S_{AP}^{\ 8}$  and to OSSR were made in File No. ER-2016-0130 because of a disagreement among Ameren, the Office of Public Counsel ("OPC") and Missouri Industrial Energy Consumers ("MIEC") concerning the methodology to determine the amount of the adjustments to  $S_{AP}$  and to OSSR for AP20.<sup>9</sup>

On March 7, 2016, Ameren, Staff, OPC and MIEC filed a Second Non-Unanimous Stipulation and Agreement to: 1) establish a methodology to determine the adjustments to  $S_{AP}$  and to OSSR for adjustment periods beginning with AP21, and 2) establish that the methodology results in an AP20 N-Factor<sup>10</sup> adjustment of \$437,526 to be retained by Ameren.

Staff reviewed the work papers of Company witness Erik C. Wenberg's Schedule EW-FAR and finds the adjustments to S<sub>AP</sub> and to OSSR for AP21 to be correct and in accordance with the methodology approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130. For AP20 and AP21, the Commission-approved methodology results in the following monthly and accumulation period amounts: (see table on following page).

<sup>&</sup>lt;sup>8</sup> Original Sheet No. 73.7 defines SAP as kWh during the AP that ended immediately prior to the FAR filing, as measured by taking the most recent kWh data for the retail component of the Company's load settled at its MISO CP node (AMMO.UE or successor node), plus the kWh reductions up to the kWh of energy sold off-system associated with the 12(M) or 13(M) OSSR adjustment above plus the metered net energy output of any generating station operating within its certificated service territory as a behind the meter resource in MISO, the output of which served to reduce the Company's load settled at its MISO CP node (AMMO.UE or successor node).

<sup>&</sup>lt;sup>9</sup> File No. ER-2016-0130 Non-unanimous Stipulation and Agreement filed on January 12, 2016 and approved by the Commission on January 20, 2016

<sup>&</sup>lt;sup>10</sup> N-Factor adjustment is the increase in the Fuel and Purchased Power Adjustment (FPA) amount as a result of any adjustments to S<sub>AP</sub> and OSSR derived from the methodology approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130.

Period	Adjustment to S <sub>AP</sub> (kWh)	Adjustment to OSSR	N-Factor
June, 2015	0	0	0
July, 2015	33,988,834	\$776,171	\$157,445
August, 2015	34,172,924	\$763,688	\$142,445
September, 2015	38,995,367	\$843,021	\$137,636
AP20	107,157,125	\$2,382,880	\$437,526
October, 2015	47,504,051	\$969,394	\$140,646
November, 2015	44,000,328	\$874,996	\$108,519
December, 2015	26,243,898	\$533,663	\$75,911
January, 2016	187,564,831	4,038,458	\$755,689
AP21	305,313,109	\$6,416,512	\$1,080,766

#### Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri's work papers for AP21 contain data and calculations for ANEC equal to \$198,934,394<sup>11</sup> (line 1 of 3<sup>rd</sup> Revised Sheet No. 73.11) and B equal to \$208,577,055<sup>12</sup> (line 2 of 3<sup>rd</sup> Revised Sheet No. 73.11). For this filing, B is equal to sales of 12,063,450,248 kWh for October 1, 2015 through January 31, 2016 times \$0.01729<sup>13</sup> per kWh. The difference between ANEC and B is equal to (\$9,642,661) and is the amount on line 3 of 3<sup>rd</sup> Revised Sheet No. 73.11, Total Company Fuel and Purchased Power Difference.

#### **Calculation of FPA Amount**

Ameren Missouri's work papers and 3<sup>rd</sup> Revised Sheet No. 73.11 show the FPA Amount<sup>14</sup> of (\$13,933) to be the sum of:

<sup>&</sup>lt;sup>11</sup> Actual Net Energy Cost (ANEC) of \$198,934,394 excludes \$6,416,512 due to the adjustment to OSSR for AP21.

<sup>&</sup>lt;sup>12</sup> Net Base Energy Cost (B) of \$208,577,055 excludes \$5,278,864 of net base energy cost due to a reduction of the  $S_{AP}$  equal to 305,313,109 kWh.

 $<sup>^{13}</sup>$  Winter Base Factor (BF<sub>Winter</sub>) rate on Original Sheet No. 73.7 of \$0.01729 per kWh was used to calculate B (line 2 of  $3^{rd}$  Revised Sheet No. 73.11). BF<sub>Winter</sub> is applicable for the October through May calendar months.

<sup>&</sup>lt;sup>14</sup> 3<sup>rd</sup> Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of (\$13,933).

Fuel and purchased power amount to be recovered from customers for AP21 equal to (\$9,160,528)<sup>15</sup> (Line 4 on 3<sup>rd</sup> Revised Sheet No. 73.11); minus

- 1. Interest of \$489,598 which includes: (\$14,849) for AP21, \$503,030 for Recovery Period 18 ("RP18") and \$1,417 for the N-Factor for AP20; plus
- 2. The true-up amount, without interest, equal to \$8,656,997<sup>16</sup> which includes the sum of: a) RP18 true-up amount of \$8,219,471 which is pending Commission approval in File No. ER-2016-0244, and b) \$437,526 for the N-Factor for AP20 approved in File No. ER-2016-0130.

#### Calculation of FAR<sub>21</sub>

FAR<sub>21</sub> of \$0.00000 per kWh is equal to the FPA Amount of (\$13,933) divided by the Estimated Recovery Period Sales in kWh settled at MISO CP node (AMMO.UE or successor node) of 23,442,797,648 kWh. FAR<sub>21</sub> will apply during RP21—Ameren Missouri's billing months of June 2016 through January 2017.

#### **Calculation of FAR Without Voltage Level Adjustments**

Line 9 of Ameren Missouri's proposed  $3^{rd}$  Revised Sheet No. 73.11 reflects a FAR of (\$0.00002) per kWh which is the sum of: 1) FAR<sub>21</sub> of \$0.00000 per kWh, and 2) FAR<sub>20</sub> of (\$0.00002) per kWh.

#### **Voltage Level FARs**

Because of a difference in line losses, <sup>17</sup> there may be different Initial Rate Components for service taken at the Secondary, Primary, and Large Transmission voltage levels reflected on lines 11, 13 and 15 of 3<sup>rd</sup> Revised Sheet No. 73.11. Because the Initial Rate Component for Large Transmission voltage service of (\$0.00002) / kWh is less than \$0.00200 / kWh, <sup>18</sup> the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the

<sup>&</sup>lt;sup>15</sup> Fuel and purchased power amount to be recovered from customers for AP21 is equal to ninety-five percent (95 %) of (\$9,642,661) (the difference between ANEC and B during AP21).

<sup>&</sup>lt;sup>16</sup> The true-up amount without interest of \$8,656,997 is slightly higher due to rounding

<sup>&</sup>lt;sup>17</sup> Secondary, Primary, and Large Transmission Voltage Adjustment Factors are shown on lines 10, 12, and 14, respectively, on Ameren Missouri's proposed 3<sup>rd</sup> Revised Sheet No. 73.11.

<sup>&</sup>lt;sup>18</sup> The Commission's Report and Order in Case No. ER-2015-0258 created a new Industrial Aluminum Smelter Rate Class for which the FAR IAS rate is capped at \$0.00200 per kWh.

RP21 FARs for each service voltage level and the Industrial Aluminum Smelter ("IAS") Service rate class FAR is equal to that of the Large Transmission voltage level rate class. The RP21 FARs are in the table below:

Service	RP21 FAR	Line on 3 <sup>rd</sup> Revised Sheet No. 73.11
Secondary	(\$0.00002)/kWh	21
Primary	(\$0.00002)/kWh	22
Large Transmission	(\$0.00002)/kWh	23
IAS	(\$0.00002)/kWh	16

Listed below are the proposed RP21 FARs, the current RP20 FARs and the difference between them for Secondary, Primary, and Large Transmission and IAS service:

	Proposed RP21 FAR	Current RP20 FAR	Difference
Secondary	(\$0.00002)/kWh	\$0.00191/kWh	\$0.00193/kWh Decrease
Primary	(\$0.00002)/kWh	\$0.00186/kWh	\$0.00188/kWh Decrease
Large Transmission	(\$0.00002)/kWh	\$0.00179/kWh	\$0.00181/kWh Decrease
IAS	(\$0.00002)/kWh	\$0.00179/ kWh	\$0.00181/kWh Decrease

Based on a monthly usage of 1,105 kWh, the proposed change to the Secondary FAR would decrease the Fuel Adjustment Charge of an Ameren Missouri residential customer's bill from \$2.11 to (\$0.02), a decrease of \$2.13 per month. As mentioned above company witness Erik C. Wenberg states:

The primary factor driving this decrease was higher capacity sales revenue, partially offset by the Adjustment for Reduction of Service Classification 13(M) (otherwise known as the IAS class) triggered by load reductions at Noranda Aluminum, Inc.'s smelter (this adjustment is generally referred as the "N factor adjustment"). <sup>19</sup>

<sup>&</sup>lt;sup>19</sup> Company witness Erik C. Wenberg's direct testimony page 2, line 21 through page 3, line 1.

Staff reviewed the proposed 3<sup>rd</sup> Revised Sheet No. 73.11, the direct testimony of Ameren Missouri witness Erik C. Wenberg and the work papers in this filing, as well as Ameren Missouri's monthly information submitted in compliance with 4 CSR 240-3.161(5) for AP21. Staff verified that the actual fuel and purchased power costs and emissions costs net of off-system sales revenues reflected therein match the fuel and purchased power costs and emission costs net of off-system sales revenues on line 1 of Ameren Missouri's proposed 3<sup>rd</sup> Revised Sheet No. 73.11 and the supporting schedules of witness Erik C. Wenberg. Staff reviewed Ameren Missouri's monthly reports and verified that the kWh billed as shown on the monthly reports match the accumulation period sales used to calculate B. Staff reviewed Ameren Missouri's monthly interest rates that are applied to 95% of the over/under Net Base Energy Cost amount and verified that the monthly interest rates and calculations of monthly interest amounts are correct for AP21.

#### **Staff Recommendation**

Ameren Missouri timely filed 3<sup>rd</sup> Revised Sheet No. 73.11, and based on Staff's review, Staff has determined that Ameren Missouri is in compliance with Commission Rule 4 CSR 240-3.161 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements), and Ameren Missouri's FAC embodied in its tariff.

Commission Rule 4 CSR 240-20.090(4) provides in part:

[T]he commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility's filing or, if no such order is issued, the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed.

Ameren Missouri requested that 3<sup>rd</sup> Revised Sheet No. 73.11, filed March 24, 2016 become effective on May 25, 2016, the beginning of the first billing cycle of Ameren Missouri's June 2016 billing month. Thus, the proposed tariff sheet was filed with 62 days' notice. Therefore, Staff recommends the Commission issue an order approving the following proposed tariff sheet, as filed on March 24, 2016, to become effective on May 25, 2016, as requested by Ameren Missouri:

#### MO.P.S.C. Schedule No. 6

3<sup>rd</sup> Revised Sheet No. 73.11 Cancelling 2<sup>nd</sup> Revised Sheet No. 73.11.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2015 Annual Report<sup>20</sup>. 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 File No. ER-2016-0244 as noted herein.

 $<sup>^{\</sup>rm 20}$  Ameren Missouri filed its 2015 Annual Report on April 15, 2016.

In the Matter of the Adjustment of Union Electric Company d/b/a Ameren Missouri's Fuel Adjustment Clause for the 21 <sup>st</sup> Accumulation Period		) ) )	File No. ER-2016-0243 Tariff No. YE-2016-0245
Α	FFIDAVIT OF MATTHE	EW J. BAI	RNES
STATE OF MISSOURI	)		
COUNTY OF COLE	) ss )		
lawful age; that he contributhat the same is true and con	ted to the attached Staff Recreet according to his best ki	commenda	res that he is of sound mind and tion in Memorandum form; and and belief.
Further the Affiant s	sayeth not.		
		Mattle	w J. Damer
		M	atthew J. Barnes
Subscribed and sworn to be	this 25th day of Ap	oril, 2016.	
	_	Dian	nei L. Vaught Notary Public
DIANNA L. VAUGHT Notary Public - Notary Seal State of Missourl Commissioned for Cole County My Commission Expires: June 28, 29 Commission Number: 15207377	019	٠	rotary I dono

In the Matter of the Adjustn Company d/b/a Ameren Mi Clause for the 21 <sup>st</sup> Accumul	ssouri's Fuel Adjustment	) ) )	<u>File No. ER-2016-0243</u> Tariff No. YE-2016-0245
	AFFIDAVIT OF CURT B. (	GATEL	LEY
STATE OF MISSOURI COUNTY OF COLE	) ) ss )		
lawful age; that he contribut	rect according to his best know	nmenda	tion in Memorandum form; and
•	<u>C</u>		B. Gateley
Subscribed and sworn to be	this $\frac{251}{2}$ day of April,	2016.	
DIANNA L. VAUGHT Notary Public - Notary Sea State of Missouri Commissioned for Cole Cour My Commission Expires: June 26 Commission Number: 15207	nty , 2019	Dia	Notary Public

In the Matter of the Adjustment of Union Electric Company d/b/a Ameren Missouri's Fuel Adjustment Clause for the 21 <sup>st</sup> Accumulation Period		) )	<u>File No. ER-2016-0243</u> Tariff No. YE-2016-0245
	AFFIDAVIT OF DAVI	D C. RO	os
STATE OF MISSOURI	)		
COUNTY OF COLE	) ss )		
COMES NOW, Data lawful age; that he contribute that the same is true and cor	ed to the attached Staff Red	commenda	that he is of sound mind and ation in Memorandum form; and and belief.
Further the Affiant s	ayeth not.	Davi	O. Am d C. Roos
Subscribed and sworn to be	this <u>25 th</u> day of Ap	oril, 2016.	
DIANNA L. VAUGHT Notary Public - Notary Se State of Missouri Commissioned for Cole Co	i i	Dian	Notary Public
Commissioned for Cole Co My Commission Expires: June 2 Commission Number: 1520	98 2010 l		