

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

In the Matter of the Adjustment of Union)	
Electric Company d/b/a Ameren Missouri's)	<u>File No. ER-2017-0024</u>
Fuel Adjustment Clause for the 22 nd)	Tariff No. YE-2017-0018
Accumulation Period)	

**STAFF RECOMMENDATION TO APPROVE TARIFF SHEET REGARDING
CHANGE TO THE FUEL ADJUSTMENT RATE FOR ACCUMULATION PERIOD 22**

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 July 25, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed a proposed tariff sheet, 4th Revised Sheet No. 73.11, as substituted¹ on August 23, 2016, 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 a September 23, 2016 effective date which is the beginning of Ameren Missouri's October 2016 billing month.

2. Concurrently on July 25, Ameren Missouri submitted a true-up filing in File No. ER-2017-0025 to identify the amount of over- or under-recovery during Recovery Period 19 ("RP19") prescribed by its FAC. The over- or under-recovered amount

¹ The substitute tariff sheet and workpapers include only 6 significant digits for FAR₂₁ on line 8 of 4th Revised Sheet No. 73.11 (i.e. \$0.00000) and correct for rounding of the FAR₂₂ on line 9 of 4th Revised Sheet No. 73.11. This correction did not change the AP22 FARs for the secondary, primary, transmission and Industrial Aluminum Smelter customers.

(or true-up amount) and interest amount for RP19 are used when calculating the new FARs in this case.

3. On July 27, the Commission ordered Staff to examine and analyze Ameren Missouri's filings in this case, and to file its recommendation no later than August 24, 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 August 11, 2016. The Missouri Industrial Energy Consumers timely filed its application 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 July 25, 2016 as substituted on August 23, 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..."² 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."

² 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.

6. Ameren Missouri's filing in this case requests Commission approval of one tariff sheet bearing an effective date of September 23, 2016, that revises the current FARs in its FAC. The filing includes testimony and work papers of Ameren Missouri witness Erik C. Wenberg supporting the Company's calculation of the Fuel and Purchased Power Adjustment ("FPA").

7. The FPA amount is \$12,167,637³. The FPA amount⁴ is the sum of: Customer Responsibility for Accumulation Period 22 ("AP22") equal to \$12,232,608⁵ (Line 4 on 4th Revised Sheet No. 73.11); minus Interest for AP22 and RP19, equal to \$471,052 (Line 4.1 on 4th Revised Sheet No. 73.11) which includes \$10,640 for AP22 and \$460,412 for RP19; plus True-Up amount for RP19 without interest equal to (\$536,023)⁶ (Line 4.2 on 4th Revised Sheet No. 73.11). This True-Up amount is before the Commission for approval in pending File No. ER-2017-0025.

8. As explained in Staff's *Memorandum*, the FPA amount results in a Current Period Fuel Adjustment Rate ("FAR₂₂") of \$0.00057 per kWh (Line 7 on 4th Revised Sheet No. 73.11) which, when added to the Prior Period FAR (FAR₂₁) of \$0.00000 per kWh (Line 8 on 4th Revised Sheet No. 73.11), results in a proposed FAR of \$0.00057 per kWh (Line 9 on 4th Revised Sheet No. 73.11), which is an increase of \$0.00057 per kWh when compared to the existing FAR of \$0.00000 per kWh. Because of a difference in line losses, the FAR is adjusted for the voltage at which customers receive service.

³ An amount not bracketed in parentheses represents an amount owed to the utility.

⁴ 4th Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of \$12,167,637.

⁵ The customer responsibility for AP22 is equal to ninety-five percent (95%) of \$12,876,430 (the difference between Actual Net Energy Cost ("ANEC") and Net Base Energy Cost ("B") during AP22).

⁶ A bracketed amount in parentheses represents an amount owed to customers.

9. Because the Initial Rate Component for Large Transmission voltage service of \$0.00056 / kWh is less than \$0.00200 / kWh,⁷ the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the Recovery Period (“RP22”) 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 RP22 FARs and the difference between them for Secondary, Primary, and Large Transmission and IAS service:

	Proposed RP21 FAR	Current RP20 FAR	Difference
Secondary	\$0.00060/kWh	(\$0.00002)/kWh	\$0.00062/kWh Increase
Primary	\$0.00058/kWh	(\$0.00002)/kWh	\$0.00060/kWh Increase
Large Transmission	\$0.00056/kWh	(\$0.00002)/kWh	\$0.00058/kWh Increase
IAS	\$0.00056/kWh	(\$0.00002)/ kWh	\$0.00058/kWh Increase

Based on a monthly usage of 1,105 kWh, the proposed change to the Secondary FAR would increase the Fuel Adjustment Charge of an Ameren Missouri residential customer’s bill from (\$0.02) to \$0.61 per month.

10. According to Ameren Missouri witness Erik Wenberg, “[T]he primary drivers for this increase were increased fuel costs and lower off-system sales margins. The increase also reflects \$1,979,533 (plus applicable interest) for the Adjustment for Reduction of Service Classification 12(M) or 13(M) Billing Determinants provided for in Rider FAC (sometimes referred to as the “N Factor”) for Accumulation Period 22,

⁷ 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.

calculated in accordance with the Commission's Order Approving Second Stipulation and Agreement in Case No. ER-2016-0130.”⁸

11. Staff has determined that Ameren Missouri timely filed the 4th Revised Tariff Sheet No. 73.11 as substituted on August 23, 2016 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-2017-0025 as noted herein.

WHEREFORE, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet filed on July 25, 2016 and substituted on August 23, 2016, to become effective on September 23, 2016, as requested by Ameren Missouri:

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

4th Revised Sheet No. 73.11 Cancelling 3rd Revised Sheet No. 73.11.

⁸ Direct testimony of Erik C. Wenberg, page 5, lines 12 through 18.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Deputy Staff Counsel

Missouri Bar No. 51709

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-7779 (Telephone)

(573) 751-9285 (Fax)

bob.berlin@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 24th day of August, 2016, to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0024, Tariff Tracking No. YE-2017-0018
Union Electric Company d/b/a Ameren Missouri

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

/s/ John Rogers 08/24/2016 /s/ Bob Berlin 08/24/2016
Energy Resources Department / Date Staff Counsel's Office / Date

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 Nos. ER-2014-0258 and ER-2016-0130.

DATE: August 24, 2016

Recommendation

On July 25, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one (1) tariff sheet, 4th Revised Sheet No. 73.11, as substituted August 23, 2016, bearing a proposed effective date of September 23, 2016, and cancelling 3rd Revised Sheet No. 73.11. The filed tariff sheet, 4th Revised Sheet No. 73.11, as substituted August 23, 2016, revises Ameren Missouri's Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 22 ("AP22") which ended on May 31, 2016. Staff recommends the Missouri Public Service Commission ("Commission") approve 4th Revised Sheet No. 73.11, as substituted August 23, 2016. The Commission assigned the tariff sheet to Tariff Tracking No. YE-2017-0018.

Ameren Missouri's July 25, 2016 filing includes the testimony of Ameren Missouri witness Erik C. Wenberg and associated Ameren Missouri work papers. On August 23, 2016, Ameren Missouri filed a substitute tariff sheet and work papers to 1) include only 6 significant digits in the work papers for FAR₂₁ on line 8 of 4th Revised Sheet No. 73.11 (i. e., \$0.00000) and 2) correct for rounding of the FAR₂₂ on line 9 of 4th Revised Sheet No. 73.11. This correction did not change the FARs for the secondary, primary, transmission and Industrial Aluminum Smelter customers. 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 \$12,167,637 and is reflected on line 5 of 4th Revised Sheet No. 73.11, as substituted August 23, 2016. This FPA Amount results in a FAR₂₂¹ of \$0.00057 per kWh, which when added to the FAR₂₁² of \$0.00000 per kWh, results in a proposed FAR³ of \$0.00057 per kWh. The proposed FAR is \$0.00057 per kWh more than the current FAR⁴ of \$0.00000 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")⁵ calculation and an adjustment to the accumulation period sales to calculate Net Base Energy Cost ("B")⁶. 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-2014-0258.

¹ FAR_{RP} 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 22, FAR_{RP} in this recommendation is referred to as FAR₂₂.

² FAR_(RP-1) 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 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 FAR₂₂.

³ 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).

⁴ The \$0.00000 per kWh rate is found on line 9 of 3rd Revised Sheet No. 73.11.

⁵ 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 4th Revised Sheet No. 73.11, as substituted August 23, 2016.

⁶ B = Base Factor times the accumulation period sales as reflected on lines 2, 2.1 and 2.2 of 4th Revised Sheet No. 73.11, as substituted August 23, 2016.

In 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 to S_{AP} ⁷ 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 AP20.⁸

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-Factor⁹ 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_{AP} and to OSSR for AP22 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 File No. ER-2016-0130. For AP22 the Commission-approved methodology results in the following monthly and accumulation period amounts:

Period	Adjustment to S_{AP} (kWh)	Adjustment to OSSR	N-Factor
February 2016	196,242,502	\$3,853,665	\$437,601
March 2016	191,631,312	\$3,680,116	\$348,470
April 2016	207,299,715	\$4,335,131	\$713,373
May 2016	251,293,326	\$4,850,218	\$480,088
AP22	846,466,855	\$16,719,131	\$1,979,533

⁷ Original Sheet No. 73.7 defines S_{AP} 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).

⁸ File No. ER-2016-0130 Non-unanimous Stipulation and Agreement filed on January 12, 2016 and approved by the Commission on January 20, 2016

⁹ N-Factor adjustment is the increase in the Fuel and Purchased Power Adjustment (FPA) amount as a result of any adjustments to S_{AP} and OSSR derived from the methodology approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in File No. ER-2016-0130.

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri's work papers for AP22 contain data and calculations for ANEC equal to \$201,251,119¹⁰ (line 1 of 4th Revised Sheet No. 73.11, as substituted August 23, 2016) and B equal to \$188,374,689¹¹ (line 2 of 4th Revised Sheet No. 73.11, as substituted August 23, 2016). For this filing, B is equal to sales of 10,895,008,039 kWh for February 2016 through May 2016 times \$0.01729¹² per kWh. The difference between ANEC and B is equal to \$12,876,430 and is the amount on line 3 of 4th Revised Sheet No. 73.11, as substituted August 23, 2016, Total Company Fuel and Purchased Power Difference.

Calculation of FPA Amount

Ameren Missouri's work papers and 4th Revised Sheet No. 73.11, as substituted August 23, 2016, show the FPA Amount¹³ of \$12,167,637 to be the sum of:

1. Fuel and purchased power amount to be recovered from customers for AP22 equal to \$12,232,608¹⁴ (Line 4 on 4th Revised Sheet No. 73.11, as substituted August 23, 2016); minus
2. Interest of \$471,052 which includes: \$10,640 for AP22, \$460,412 for Recovery Period 19 ("RP19"); plus
3. The true-up amount, without interest, equal to (\$536,023) which is pending Commission approval in File No. ER-2017-0025.

Calculation of FAR₂₂

FAR₂₂ of \$0.00057 per kWh is equal to the FPA Amount of \$12,167,637 divided by the Estimated Recovery Period Sales in kWh settled at MISO CP node (AMMO.UE or successor node) of 21,513,489,636 kWh. FAR₂₂ will apply during Recovery Period 22 ("RP22") - Ameren Missouri's billing months of October 2016 through May 2017 and during Recovery Period 23 - Ameren Missouri's billing months of February 2017 through September 2017.

¹⁰ Actual Net Energy Cost (ANEC) of \$201,251,119 includes \$16,719,131 due to the adjustment to OSSR for AP22.

¹¹ Net Base Energy Cost (B) of \$188,374,689 includes \$1,979,533 of net base energy cost due to an increase of the S_{AP} equal to 846,466,855 kWh.

¹² Winter Base Factor (BF_{Winter}) rate on Original Sheet No. 73.7 of \$0.01729 per kWh was used to calculate B (line 2 of 3rd Revised Sheet No. 73.11). BF_{Winter} is applicable for the October through May calendar months.

¹³ 4th Revised Sheet No. 73.11, as substituted August 23, 2016, lines 1 through 5 include the complete calculation of the FPA Amount of \$12,167,637.

¹⁴ Fuel and purchased power amount to be recovered from customers for AP22 is equal to ninety-five percent (95 %) of \$12,876,430 (the difference between ANEC and B during AP22).

Calculation of FAR Without Voltage Level Adjustments

Line 9 of Ameren Missouri’s proposed 4th Revised Sheet No. 73.11, as substituted August 23, 2016, reflects a FAR of \$0.00057 per kWh which is the sum of: 1) FAR₂₂ of \$0.00057 per kWh, and 2) FAR₂₁ of \$0.00000 per kWh.

Voltage Level FARs

Because of a difference in line losses,¹⁵ 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 4th Revised Sheet No. 73.11, as substituted August 23, 2016. Because the Initial Rate Component for Large Transmission voltage service of \$0.00056 / kWh is less than \$0.00200 / kWh,¹⁶ the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the RP22 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 RP22 FARs are in the table below:

Service	RP22 FAR	Line on 4 th Revised Sheet No. 73.11
Secondary	\$0.00060/kWh	21
Primary	\$0.00058/kWh	22
Large Transmission	\$0.00056/kWh	23
IAS	\$0.00056/kWh	16

Listed below are the proposed RP22 FARs, the current RP21 FARs and the difference between them for Secondary, Primary, and Large Transmission and IAS service:

¹⁵ Secondary, Primary, and Large Transmission Voltage Adjustment Factors are shown on lines 10, 12, and 14, respectively, on Ameren Missouri’s proposed 4th Revised Sheet No. 73.11, as substituted August 23, 2016.

¹⁶ 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.

	Proposed RP22 FAR	Current RP21 FAR	Difference
Secondary	\$0.00060/kWh	(\$0.00002)/kWh	\$0.00062/kWh Increase
Primary	\$0.00058/kWh	(\$0.00002)/kWh	\$0.00060/kWh Increase
Large Transmission	\$0.00056/kWh	(\$0.00002)/kWh	\$0.00058/kWh Increase
IAS	\$0.00056/kWh	(\$0.00002)/kWh	\$0.00058/kWh Increase

Based on a monthly usage of 1,105 kWh, the proposed change to the Secondary FAR would increase the Fuel Adjustment Charge of an Ameren Missouri residential customer's bill from (\$0.02) to approximately \$0.61 per month.

In his filed direct testimony, Company witness Erik C. Wenberg states:

The primary drivers for this increase were increased fuel costs and lower off-system sales margins. The increase also reflects \$1,979,533 (plus applicable interest) for the Adjustment for Reduction of Service Classification 12(M) or 13(M) Billing Determinants provided for in Rider FAC (sometimes referred to as the "N Factor") for Accumulation Period 22, calculated in accordance with the Commission's *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130.¹⁷

Staff reviewed the proposed 4th Revised Sheet No. 73.11, as substituted August 23, 2016, 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 AP22. 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 4th Revised Sheet No. 73.11, as substituted August 23, 2016, 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 AP22.

¹⁷ Company witness Erik C. Wenberg's direct testimony page 5, line 13 through 18.

Staff Recommendation

Ameren Missouri timely filed 4th Revised Sheet No. 73.11, as substituted August 23, 2016, 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 4th Revised Sheet No. 73.11, filed July 25, 2016, as substituted on August 23, 2016, become effective on September 23, 2016, the beginning of the first billing cycle of Ameren Missouri's October 2016 billing month. Thus, the proposed tariff sheet was filed with 60 days' notice. Therefore, Staff recommends the Commission issue an order approving the following proposed tariff sheet, as filed on July 25, 2016, as substituted on August 23, 2016, to become effective on September 23, 2016 as requested by Ameren Missouri:

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

4th Revised Sheet No. 73.11 Cancelling 3rd Revised Sheet No. 73.11.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2015 Annual Report.¹⁸ 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 and general rate case ER-2016-0179 as noted herein.

¹⁸ Ameren Missouri filed its 2015 Annual Report on April 15, 2016.

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

In the Matter of the Adjustment of Union Electric)
Company d/b/a Ameren Missouri's Fuel Adjustment)
Clause for the 22nd Accumulation Period) **File No. ER-2017-0024**

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Curt B. Gateley and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Memorandum; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.



Curt B. Gateley

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August, 2016.



NOTARY PUBLIC

JESSICA LUEBBERT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: February 19, 2019 Commission Number: 15633434

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

In the Matter of the Adjustment of Union Electric)
Company d/b/a Ameren Missouri's Fuel Adjustment)
Clause for the 22nd Accumulation Period) **File No. ER-2017-0024**

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Memorandum; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



David C. Roos

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August, 2016.

JESSICA LUEBBERT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: February 19, 2019 Commission Number: 15633434



NOTARY PUBLIC