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

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In the Matter of the Adjustment of Union Electric Company d/b/a Ameren Missouri's Fuel Adjustment Clause for the 20<sup>th</sup> Accumulation Period.

File No. ER-2016-0130 Tariff No. YE-2016-0129

## AMEREN MISSOURI'S RESPONSE TO ORDER DIRECTING FILING

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its Response to the Order Directing Filing ("Response") issued on January 8, 2016, states as follows:

1. On November 25, 2015, Ameren Missouri submitted direct testimony and a tariff designed to implement an adjustment to its Fuel and Purchased Power Adjustment Clause ("FAC") for the 20<sup>th</sup> accumulation period.

2. On January 7, 2016, the Office of the Public Counsel ("OPC") and Missouri Industrial Energy Consumers ("MIEC") filed a Motion to Reject Tariff alleging that the proposed tariff does not comply with the Company's FAC mechanism because it incorrectly calculates an adjustment.

3. On January 8, 2016, the Missouri Public Service Commission ("Commission") issued an Order Directing Filing ("Order") directing Ameren Missouri to file a response to OPC's and MIEC's Motion to Reject Tariff by no later than 12:00 p.m. on January 12, 2016.

4. In response to the Commission's Order, Ameren Missouri states that it has reviewed the proposed tariff filed in this case and has spent a great deal of time internally reviewing its calculations. Ameren Missouri has also had discussions with Commission Staff ("Staff"), OPC and MIEC in an attempt to reach an agreement on the correct calculation for this adjustment. 5. As part of that collaboration, it has become apparent that this calculation is more complicated than previously anticipated.

6. Ameren Missouri believes that the Company, Staff, OPC and MIEC have come to an agreement on a process to reach a resolution and to still allow rates to take effect on January 27, 2016. The parties are working on a Stipulation and Agreement to submit to the Commission.

7. Instead of filing an incomplete and insufficient Response to meet the 12:00 p.m. deadline today, the Company is filing this Response to advise the Commission that they are working on the Stipulation and Agreement and will file it by the end of the day today, January 12, 2016.

WHEREFORE, Ameren Missouri respectfully requests that the Commission accept this Response to its Order Directing Filing issued on January 8, 2016, and allow the Company more time to file its completed Stipulation and Agreement to resolve this matter by the end of the day on January 12, 2016.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

Is Wendy K. Tatro

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in this case on this 12<sup>th</sup> day of January, 2016.

/s/ Wendy K. Tatro