

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

In the Matter of Union Electric)
Company d/b/a Ameren Missouri`s)
ACA Audit.)

Case No. GR-2013-0100

**STAFF RECOMMENDATION REGARDING MOTION FOR VARIANCE
FROM TARIFF PROVISION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Recommendation, states as follows:

1. On September 13, 2013, Union Electric Company d/b/a Ameren Missouri (Ameren or Company) filed its Motion For Variance From Tariff Provision (Motion) that would allow the Company to use for its PGA calculation an alternative base period of sales volumes as of the twelve (12) months ending August of 2011.

2. That same day the Commission issued its *Order Establishing Time To File Recommendation* directing the Staff to file a recommendation regarding Ameren's Motion no later than September 27, 2012.

3. Staff has reviewed Ameren's Motion and recommends the Commission approve it for reasons explained below and in Staff's Memorandum attached hereto as Appendix A.

4. Staff notes that Ameren's tariff defines the "base period" of sales volumes used in its PGA calculation as including a period when Ameren experienced sales volumes of less than 80% of normal expected sales. If Ameren were to calculate its PGA using the base period defined by its tariff, the use of such low sales volumes would

result in customers paying a much higher PGA rate than would be expected under a more normal winter period. Therefore, Commission approval of Ameren's Motion would allow customers the benefit of a lower PGA rate more representative of rates expected for the upcoming winter and would avoid the impact of higher PGA rates resulting from last year's unusually warm winter.

WHEREFORE, for the reasons stated above and in Staff's Memorandum, the Staff respectfully requests that the Commission issue an order approving Ameren's Motion For Variance From Tariff Provision.

Respectfully submitted,

/s/Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 26th day of September 2013.

/s/ Robert S. Berlin