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

In the Matter of Union Electric Company ) d/b/a Ameren Missouri changes to Company's ) Purchased Gas Adjustment (PGA) Clause ) File No. GR-2015-0271 Tracking No. YG-2016-0101

#### STAFF RECOMMENDATION

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

1. On October 15, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed two (2) tariff sheets bearing an effective date of November 1, 2015. These tariff sheets were filed to reflect changes to the Company's Purchased Gas Adjustment (PGA) factors. The proposed tariff sheets also reflect adjustments to the Company's Actual Cost Adjustment (ACA) factors.

2. Ameren Missouri's proposed tariff sheets include two separate PGA rates—one for its customers in the Rolla System service area, and one for customers in all other service areas. Rates paid by customers in the Rolla System service area include an "Incremental ACA factor," which is a credit to customers reflecting a refund of overcharges by MoGas Pipeline, LLC. This Incremental ACA factor is not included in the PGA rate for the Rolla System; rather, the credit is applied as a separate line item on a customer's bill.

3. For the Company's residential natural gas customers, other than those in the Rolla service area, the tariff sheets reflect a decrease in the total PGA rate to \$0.0278 from \$0.0678 per Ccf for the first 30 Ccfs the customer uses. For all usage in

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excess of 30 Ccfs, the proposed PGA rate represents a decrease to \$0.8230 per Ccf from \$0.8630.

4. For those residential customers in the Company's Rolla System service area, the proposed tariff sheets reflect a decrease in the PGA rate to \$0.2064 from \$0.2488 per Ccf for the first 30 Ccfs. For all usage in excess of 30 Ccfs, the PGA rate will decrease to \$1.0016 from \$1.0440. These rates do not include the Incremental ACA factor credit noted above.

5. The Company's filing also reflects adjustments to the Company's ACA factors. The ACA tracks the Company's over- or under-collections based on its actual cost of gas during a previous period. Staff's Procurement Analysis Unit (PAU) will review the Company's ACA filing and may recommend adjustments to the ACA account balance to be applied to a future filing. Due to the limited time available to review the documentation supporting the ACA factors represented in this filing, the PAU has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 16, 2016.

6. Case No. GR-2015-0271, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 ACA filing. As explained in Staff's *Memorandum*, attached hereto and incorporated herein by reference, Staff has reviewed the PGA factors in this matter and determined that the rates on the proposed tariff sheets were calculated in conformance with the Company's PGA clause. Therefore, Staff recommends the Commission approve the tariff sheets on

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an interim basis, subject to refund pending a final Commission decision in ACA Case No. GR-2015-0271.

7. Staff also recommends the Commission order PAU Staff to file the results of its review of the ACA factors represented in this filing no later than December 16, 2016.

8. Staff has verified that Ameren Missouri has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

9. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days' notice is demonstrated by Ameren Missouri's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings.

**WHEREFORE**, Staff recommends the Commission approve the following tariff sheets on an interim basis, subject to refund, and that the Commission order PAU Staff to file the results of its ACA review in this docket no later than December 16, 2016:

P.S.C. MO. No. 2

107<sup>th</sup> Revised SHEET No. 30, Cancelling 106<sup>th</sup> Revised SHEET No. 30 21<sup>st</sup> Revised SHEET No. 30.1, Cancelling 20<sup>th</sup> Revised SHEET No. 30.1

Respectfully submitted,

#### <u>/s/ Jeffrey A. Keevil</u>

Jeffrey A. Keevil Missouri Bar No. 33825 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 526-4887 (Telephone) (573) 751-9285 (Fax) Email: jeff.keevil@psc.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 22<sup>nd</sup> day of October, 2015.

## /s/ Jeffrey A. Keevil

### **MEMORANDUM**

- TO: Missouri Public Service Commission Official Case File, Case No. GR-2015-0271, File No. YG-2016-0101 Union Electric Company d/b/a Ameren Missouri
- FROM: Michelle A. Bocklage, Energy Unit Tariffs/Rate Design

<u>/s/ Thomas M. Imhoff</u> 10/22/2015	/s/ Jeffrey A. Keevil 10/22/2015
Utility Operations Division/Date	Staff Counsel's Office/Date

- SUBJECT: Staff Recommendation for Union Electric d/b/a Ameren Missouri Scheduled Winter Season PGA Tariff Filing Effective November 1, 2015
- DATE: October 22, 2015

On October 15, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), of St. Louis, Missouri, filed two (2) tariff sheets bearing an effective date of November 1, 2015. These tariff sheets were filed to reflect changes in Ameren Missouri's Purchased Gas Adjustment ("PGA") factors as a result of estimated changes in the cost of natural gas and changes in the Actual Cost Adjustment ("ACA") factor. Ameren Missouri requests the tariff sheets go into effect on November 1, 2015.

For all of its natural gas service areas, other than the Rolla Service Area, the PGA rate filed by Ameren Missouri will decrease to \$0.0278 per hundred cubic foot ("Ccf") for the first 30 Ccf for residential natural gas customers from the current PGA rate of \$0.0678 per Ccf. For all Ccfs in excess of the first 30 Ccf for residential natural gas customers, the PGA rate filed by Ameren Missouri will decrease to \$.8230 per Ccf from the current PGA rate of \$0.8630per Ccf. These changes represent a decrease of \$0.04 per Ccf.

For its Rolla Service Area, the PGA rate filed by Ameren Missouri will decrease to \$0.2064 per Ccf for the first 30 Ccf for residential natural gas customers from the current PGA rate of \$0.2488 per Ccf. For all Ccfs in excess of the first 30 Ccf for residential natural gas customers, the PGA rate filed by Ameren Missouri will decrease to \$1.0016 per Ccf from the current PGA rate of \$1.0440 per Ccf. These changes represent a decrease of \$0.0424 per Ccf. However, these Rolla Service Area PGA rates do not include the ACA factor, which Ameren Missouri includes as a line item credit on customers' bills for the MoGas Pipeline, LLC ("MoGas") refund from the MoGas settlement due to overcharges by that pipeline.

Case No. GR-2015-0271, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2014-2015 ACA filing. This rate change should be on an interim, subject to refund status pending final Commission decision in ACA Case No. GR-2015-0271.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit ("PAU") has requested permission to

#### OFFICIAL CASE FILE MEMORANDUM MO PSC CASE NO. GR-2015-0271, File No.YG-2016-0101 PAGE 2 OF 2

submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 16, 2016.

Staff has verified that Ameren Missouri has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

Staff has reviewed this filing and has determined it was calculated in conformance with Ameren Missouri's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days' notice is demonstrated by Ameren Missouri's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff recommends the following tariff sheets as filed on October 15, 2015, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2

107<sup>th</sup> Revised SHEET No. 30, Cancelling 106<sup>th</sup> Revised SHEET No. 30 21<sup>st</sup> Revised SHEET No. 30.1, Cancelling 20<sup>th</sup> Revised SHEET No. 30.1

## **BEFORE THE PUBLIC SERVICE COMMISSION**

### OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri changes to Company's Purchased Gas Adjustment (PGA) Clause

Case No. GR-2015-0271

#### **AFFIDAVIT OF MICHELLE A. BOCKLAGE**

State of Missouri ) ) ss. County of Cole )

## AFFIDAVIT

**COMES NOW** Michelle A. Bocklage and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Report and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

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Michelle A. Bocklage

# 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 215 day of 0.400 day of 0.2015.

NOTARY PUBLIC

	LAURA DISTLER Notary Public, Notary Seal
	Cale Wissouri
1	Commission # 15203914 My Commission Expires June 21, 2019
	and a solid 21, 2019