

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

In the Matter of Union Electric)
Company d/b/a Ameren Missouri`s)
2011-2012 ACA Audit.)

Case No. GR-2013-0100

**STAFF RECOMMENDATION REGARDING AMEREN MISSOURI'S 2011-2012
ACTUAL COST ADJUSTMENT (ACA)**

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

1. On October 17, 2012, Ameren Missouri (Ameren or Company) filed its ACA for the 2011-2012 period. This filing consisted of two tariff sheets bearing an effective date of November 1, 2012. These tariff sheets were filed to reflect changes in the ACA rates that reconciled the Company's actual gas costs for the 2011-2012 period and were effective for the 12 month period beginning November 1, 2012.

2. The Procurement Analysis Unit (Staff) has reviewed the Company's filing and submits its recommendation as explained in Staff's Memorandum attached hereto as Appendix A in both Highly Confidential and Public versions. As a part of its review, the Staff evaluated Ameren's gas purchasing practices to evaluate the prudence of the Company's purchasing decisions for this ACA period. Staff's review also included a comparison of billed revenue recovery with actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance.

3. As a result of its review, Staff identified accounting adjustments to the Company's ACA balances for both its statewide and Rolla systems as summarized in the Executive Summary portion, pages 1-2, of Staff's Memorandum and further explained on page 3 in Section II "Gas Cost – Correction". Positive adjustments

represent an increase in gas costs to consumers and negative or “bracketed” adjustments represent a decrease or reduction in gas costs to consumers.

4. Based on its review and audit of Ameren’s gas purchasing practices described in Staff’s Memorandum, the Staff recommends the Commission order Ameren to respond to Staff’s concerns, comments, and recommendations discussed in Staff’s Memorandum.

WHEREFORE, for the reasons stated above and explained in Staff’s Memorandum, the Staff recommends the Commission 1) order Ameren to respond to Staff’s Recommendation within 30 days and 2) hold this ACA case open until Ameren provides documents demonstrating that MoGas Pipeline has made its required settlement payment and that Ameren has returned the settlement payment to its customers through the Purchased Gas Adjustment (PGA)/ACA mechanism.

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 30th day of October, 2013.

/s/ Robert S. Berlin _____