

**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) **Case No. GR-2015-0271**
Purchased Gas Adjustment (PGA) Clause)

**STAFF RECOMMENDATION REGARDING AMEREN MISSOURI'S
2014-2015 ACTUAL COST ADJUSTMENT FILING**

COMES NOW the Staff of the Missouri Public Service Commission in the above-captioned matter and files its Actual Cost Adjustment (“ACA”) Recommendation in this case concerning Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or “Company”) 2014-2015 ACA filing as set forth in the accompanying Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Ameren Missouri filed its ACA for the 2014-2015 period in this case on October 15, 2015. This filing contained the Company’s ACA account balance calculation.

2. The Procurement Analysis Unit (“Staff”) has reviewed Ameren Missouri’s filing and submits its recommendation as further explained in the accompanying Staff Recommendation Memorandum, marked Appendix A (which is incorporated herein by reference). Staff’s analysis consisted of a review of Ameren Missouri’s natural gas supply plans including a review of the Company’s gas purchasing practices to evaluate the prudence of the Company’s purchasing decisions for this ACA period; a reliability analysis; and a hedging review. Staff’s analysis also included a review of the Company’s billed revenues compared with its actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance. An over-recovery by the Company is shown as a negative ACA balance that must be returned to

customers; an under-recovery is shown as a positive ACA balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum, Staff has proposed no dollar adjustments to the Company's ACA account balances filed on October 15, 2015. Staff recommends the Commission issue an order requiring Ameren Missouri to establish the ACA account balances to reflect the under- or over-recovery balances as of August 31, 2015 as shown in the table in the "Recommendations" section of the Staff Recommendation Memorandum.

4. Although Staff has proposed no dollar adjustments, based on its review Staff has certain comments and recommendations as set forth in the Reliability Analysis and Gas Supply Planning section and the Hedging section of the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Ameren Missouri to respond to these concerns, comments, and recommendations within forty-five (45) days.

WHEREFORE, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Ameren Missouri to respond within 45 days to Staff's concerns, comments, and recommendations discussed in the Reliability Analysis and Gas Supply Planning section and the Hedging section of Staff's Recommendation Memorandum, and to establish the ACA account balances to reflect the under- or over-recovery balances as of August 31, 2015 as shown in the table in the "Recommendations" section of the Staff Recommendation Memorandum.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 counsel of record this 12th day of December, 2016.

/s/ Jeffrey A. Keevil