

4. As also explained in the accompanying Memorandum the changes in the PGA factors applicable to the Company's Rolla system service area will decrease the general service customers' PGA factor to 65.00¢/Ccf from 67.00¢/Ccf. The interruptible sales customers' PGA factor will increase to 33.12¢/Ccf from 28.55¢/Ccf. The transportation PGA factor will remain unchanged at 0.00¢/Ccf.

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 Department (PAD) 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 PAD has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 17, 2019.

6. Case No. GR-2018-0346, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2017-2018 ACA filing. Case No. GR-2017-0341 was established to track the Company's PGA factors to be reviewed in its 2016-2017 ACA filing. This rate change should be implemented on an interim basis, subject to refund, pending final Commission decisions in ACA Case Nos. GR-2018-0346 and GR-2017-0341.

7. As explained in the accompanying Memorandum, Staff has reviewed this filing and has determined that it was calculated in conformance with Ameren Missouri's PGA Clause. Therefore, Staff recommends the Commission approve the tariff sheets

on an interim basis, subject to refund pending a final Commission decision in ACA Case Nos. GR-2018-0346 and GR-2017-0341.

8. Staff also recommends the Commission order PAD Staff to file the results of its review of the ACA factors represented in this filing no later than December 17, 2019.

9. Staff has verified that the Company has filed its annual report and is not delinquent on its assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing except as set forth above.

10. 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 issue an order approving the following tariff sheets on an interim basis, subject to refund pending a final Commission decision in Case Nos. GR-2018-0346 and GR-2017-0341, and that the Commission order PAD Staff to file the results of its ACA review in this docket no later than December 17, 2019:

P.S.C. MO. No. 2

113th Revised Sheet No. 30, Cancelling 112th Revised Sheet No. 30
27th Revised Sheet No. 30.1, Cancelling 26th Revised Sheet No. 30.1

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 25th day of October, 2018.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GR-2018-0346, File No. YG-2019-0068
Union Electric Company, d/b/a Ameren Missouri

FROM: Michael J. Ensrud, Procurement Analysis

/s/ David M. Sommerer 10/25/2018 /s/ Jeffrey A. Keevil 10/25/2018
Commission Staff Division/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Union Electric Company d/b/a Ameren Missouri
PGA Tariff Filing Effective November 1, 2018

DATE: October 25, 2018

On October 18, 2018, 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, 2018. 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. Also included in this filing is the annual change to the Actual Cost Adjustment (ACA) factors. Ameren Missouri requests the tariff sheets go into effect on November 1, 2018.

Ameren Missouri states the following in its cover letter:

The change in the PGA factor applicable to the Company's service areas, excluding the Rolla area, will decrease to 46.00¢/Ccf from 48.00¢/Ccf for firm sales customers. The interruptible sales customers' PGA factor will increase to 31.87¢/Ccf from 27.30¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

The changes in the PGA factors applicable to the Company's Rolla system (Rolla, Salem, and Owensville) service area will decrease the firm sales customers' PGA factor to 65.00¢/Ccf from 67.00¢/Ccf. The interruptible sales customers' PGA factor will increase to 33.12¢/Ccf from 28.55¢/Ccf. The transportation PGA factor will remain unchanged at 0.00¢/Ccf.

For the Company's service areas, excluding the Rolla area, the proposed PGA is a decrease from the existing PGA by \$0.02 per Ccf for General Service and an increase of \$0.0457 per Ccf for Interruptible.

For the Company's service area known as the Rolla (Rolla, Salem, and Owensville) system area, the proposed PGA is a decrease from the existing PGA by \$0.02 per Ccf for General Service and an increase of \$0.0457 per Ccf for Interruptible.

These rate changes should be implemented on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2018-0346 and GR-2017-0341. Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Department requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 17, 2019. The ACA procedure involves review and true-up to review the actual gas costs incurred.

As of the issuance of this memo, the Company is not delinquent on its PSC assessment.

Staff has verified that Ameren Missouri has filed its annual report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing other than as set forth above.

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 notice of ten (10) business days for PGA change (both increases and decreases) filings.

Therefore, Staff recommends the following tariff sheets, as filed on October 18, 2018, be approved on an interim basis, subject to refund:

P.S.C. MO. No. 2

113th Revised SHEET No. 30 Cancelling 112th Revised SHEET No. 30

27th Revised SHEET No. 30.1 Cancelling 26th Revised SHEET No. 30.1

