

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 18, 2017. 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, 2017, 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, 2017, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

Respectfully submitted,

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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 for parties of record this 1st day of October, 2018.

/s/ Jeffrey A. Keevil