

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

In the Matter of Kansas City Power & Light)
Company's Request for Authority to Implement) Case No. ER-2014-0370
A General Rate Increase for Electric Service)

AMEREN MISSOURI POSITION STATEMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri, by and through counsel,
and for its position statement states as follows:

At this time, Ameren Missouri takes a position only on the issues (and sub-issues)
addressed below, but reserves its right to conduct cross-examination regarding, or brief, other
issues or sub-issues, depending on how they are addressed in filings by other parties or through the
evidence adduced thereon during the evidentiary hearings:

II. Fuel Adjustment Clause

B. Has KCPL met the criteria for the Commission to authorize it to have a fuel
adjustment clause?

Yes.

C. Should the Commission authorize KCPL to have a fuel adjustment clause?

Yes.

D. If the Commission authorizes KCPL to have a fuel adjustment clause, how should it
be structured?

i. What percentage (customers/company) of changes in costs and revenues should
the Commission find appropriate to flow through the fuel adjustment clause?

*It would be appropriate to structure the FAC as a 100% mechanism since
utilities already possess sufficient incentives to properly manage the costs and
revenues tracked in FACs.*

ii. Should the costs and revenues that are to be included in the FAC be approved by
the Commission and explicitly identified along with the FERC account,
subaccount and the resource code in which KCPL will record the actual
cost/revenue? If so, what costs and revenues should be included and what are
their corresponding FERC accounts, subaccounts and resource codes?

No.

- iii. Should the FAC tariff sheets reflect the accounts, subaccounts, resource codes, and the cost/revenue description?
No.
 - iv. Should Southwest Power Pool (“SPP”) and other regional transmission organization/independent system operator transmission fees be included in the FAC, and at what level?
Yes. Transmission charges that must be paid in order to acquire power from regional transmission organization markets should be included in FACs.
 - vi. Should all realized gains and losses from KCPL’s hedging and/or cross hedging practices be included in the FAC?
Yes. Hedging costs should not be divorced from the underlying commodity costs.
 - viii. Should the FAC include costs and revenues that KCPL is not currently incurring or receiving other than insurance recoveries, subrogation recoveries and settlement proceeds related to costs and revenues included in the FAC?
Yes, all net fuel and purchased power costs should be included in the FAC.
 - ix. Does the FAC need to have exclusionary language added to insure that NERC and FERC penalties are not included?
No.
- F. If the Commission authorizes KCPL to have an FAC, should KCPL be allowed to add cost and revenue types to its FAC between rate cases?
It is appropriate for the FAC tariff to accommodate the addition of cost and revenue types between rate cases.

XIV. Rate case expense

- B. Should the Commission require KCPL shareholders to cover a portion of KCPL's rate case expense?
No, all prudently incurred rate case expenses should be included in rates.

Respectfully submitted,

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June, 2015, I served the foregoing on via e-mail on counsel for all parties of record.

/s/ James B. Lowery

James B. Lowery