

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

In the Matter of Union Electric Company d/b/a )	<b><u>Case No. GR-2017-0341</u></b>
Ameren Missouri's Changes to Company's )	Tariff No. YG-2018-0044
Purchased Gas Adjustment (PGA) Factors )	
To be reviewed in its 2016-2017 ACA Filing )	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission in the above-captioned matter and files its Staff Recommendation as set forth in the accompanying Memorandum (which is incorporated herein by reference) concerning the October 18, 2017, tariff filing by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and further states as follows:

1. On October 18, 2017, Ameren Missouri filed two tariff sheets with a requested effective date of November 1, 2017, to reflect changes in Ameren Missouri's Purchased Gas Adjustment ("PGA") factors as a result of estimated changes in the cost of natural gas. The proposed tariff sheets also reflect adjustments to the Company's Actual Cost Adjustment ("ACA") factors.

2. Ameren Missouri's proposed tariff sheets include two separate PGA rates, one for its customers in the Rolla System service area and one for customers in all other service areas.

3. As explained in the accompanying Memorandum, the PGA factors applicable to the Company's service areas, excluding the Rolla Service area, will remain the same at 56.00¢/Ccf for general service customers. The interruptible sales customers' PGA factor will decrease to 32.69¢/Ccf from 33.64¢/Ccf. The transportation PGA will remain unchanged at 0.00¢/Ccf.

4. As also explained in the accompanying Memorandum, the changes in the PGA factors applicable to the Company's Rolla system service area will increase the general service customers' PGA factor from 68.00¢/Ccf to 76.00¢/Ccf. The interruptible sales customers' PGA factor will decrease to 33.94¢/Ccf from 34.89¢/Ccf. The transportation PGA factor will remain unchanged at 0.00¢/Ccf. The Rolla system filing also reflects the discontinuation of the MoGas settlement credit that had been refunded to this system as a separate line item.

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 Unit (PAU) 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 PAU 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, 2018.

6. Case No. GR-2017-0341, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2016-2017 ACA filing. Case No. GR-2016-0236 was established to track the Company's PGA factors to be reviewed in its 2015-2016 ACA filing. This rate change should be implemented on an interim basis, subject to refund, pending final Commission decisions in ACA Case Nos. GR-2017-0341 and GR-2016-0236.

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-2017-0341 and GR-2016-0236.

8. Staff also recommends the Commission order PAU Staff to file the results of its review of the ACA factors represented in this filing no later than December 17, 2018.

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-2017-0341 and GR-2016-0236, and that the Commission order PAU Staff to file the results of its ACA review in this docket no later than December 17, 2018:

P.S.C. MO. No. 2

111th Revised Sheet No. 30, Cancelling 110th Revised Sheet No. 30  
25th Revised Sheet No. 30.1, Cancelling 24th Revised Sheet No. 30.1

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Missouri Bar No. 33825

Attorney for the Staff of the

Missouri Public Service Commission

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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 23<sup>rd</sup> day of October, 2017.

**/s/ Jeffrey A. Keevil**

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File,  
Case No. GR-2017-0341, File No. YG-2018-0044  
Union Electric Company, d/b/a Ameren Missouri

**FROM:** Michael J. Ensrud, Procurement Analysis - Operational Analysis Department

/s/ David M. Sommerer 10/23/2017      /s/ Jeffrey A. Keevil 10/23/2017  
Commission Staff Division/Date              Staff Counsel's Office/Date

**SUBJECT:** Staff Recommendation regarding Union Electric Company, d/b/a Ameren Missouri PGA Tariff Filing Effective November 1, 2017

**DATE:** October 23, 2017

On October 18, 2017, 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, 2017. 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. Ameren Missouri requests the tariff sheets go into effect on November 1, 2017. The proposed tariff sheets also reflect adjustments to the Company’s Actual Cost Adjustment (ACA) factors.

The changes in the PGA factors applicable to the Company’s service areas, excluding the Rolla area, will remain the same at 56.00¢/Ccf for firm sales customers. The interruptible sales customers’ PGA factor will decrease to 32.69¢/Ccf from 33.64¢/Ccf<sup>1</sup>. 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 increase the firm sales customers’ PGA factor from 68.00¢/Ccf to 76.00¢/Ccf<sup>2</sup>. The interruptible sales customers’ PGA factor will decrease to 33.94¢/Ccf from 34.89¢/Ccf<sup>3</sup>. The transportation PGA factor will remain unchanged at 0.00¢/Ccf. The Rolla system filing also reflects the discontinuation of the MoGas settlement credit that had been refunded to this system as a separate line item.

Case No. GR-2017-0341, under which these changes were filed, was established to track the Company’s PGA factors to be reviewed in its 2016-2017 Actual Cost Adjustment (ACA) filing. Case No. GR-2016-0236 was established to track the Company’s PGA factors to be reviewed in its 2015-2016 ACA filing. This rate change should be implemented on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2017-0341 and GR-2016-0236.

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<sup>1</sup> This change constitutes a 0.95¢ reduction per Ccf.

<sup>2</sup> This change constitutes a 8.00¢ increase per Ccf

<sup>3</sup> This change constitutes a 0.95¢ decrease per Ccf.

Due to the limited time available to review the documentation supporting the ACA factors submitted in this filing, the Procurement Analysis Unit (“PAU”) requests permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 17, 2018. While the initial review was expedited, the ACA procedure involves in-depth review and true-up to review the actual gas costs incurred.

Staff has verified that Ameren Missouri has filed its annual report, and is not delinquent on its PSC assessment. 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 filings. Therefore, Staff recommends the Commission issue an order approving the following tariff sheets as filed on October 18, 2017, on an interim basis, subject to refund:

P.S.C. MO. No. 2

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111th Revised SHEET No. 30 Cancelling 110th Revised SHEET No. 30  
25th Revised SHEET No. 30.1 Cancelling 24th Revised SHEET No. 30.1

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

In the Matter of Union Electric Company    )  
d/b/a Ameren Missouri's Changes to        )  
Company's Purchased Gas Adjustment        )  
(PGA) Clause                                    )

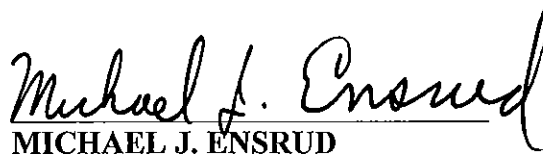
Case No. GR-2017-0341

**AFFIDAVIT OF MICHAEL J. ENSRUD**

STATE OF MISSOURI        )  
                                  )  
COUNTY OF COLE         )        ss.

**COMES NOW MICHAEL J. ENSRUD** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

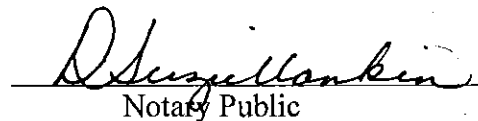
Further the Affiant sayeth not.

  
**MICHAEL J. ENSRUD**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 20<sup>th</sup> day of October 2017.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: December 12, 2020  
Commission Number: 12412070

  
Notary Public