

**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 a General Rate Increase for Electric) File No. ER-2016-0285
Service.)

AMEREN MISSOURI’S STATEMENT OF POSITIONS

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and, as required by the scheduling order adopted for this case, hereby submits its Statement of Positions, as follows:

1. Ameren Missouri has filed testimony on only part of the questions related to the Fuel Adjustment Clause (“FAC”) issues in this case.

2. Specifically, Ameren Missouri’s testimony addresses FAC-questions C, D, E, H and I, as set forth in the List of Issues filed in this case, as follows:

- C. What costs should flow through KCPL’s FAC?*
- D. What revenues should flow through KCPL’s FAC?*
- E. What is the appropriate sharing mechanism of the difference between actual and base fuel costs in KCPL’s FAC?*
- H. Should the Commission direct the parties to determine baseline heat rates for each of the utility’s nuclear and non-nuclear generators, steam and combustion turbines and heat recovery steam generators?*
- I. If the Commission authorizes KCPL to have a FAC, should KCPL be allowed to add cost and revenue types to its FAC between rate cases?*

3. With respect to questions C and D, Ameren Missouri states that it is appropriate for the Commission to include the following costs and revenues in FACs in Missouri: the non-internal labor-related costs and revenues recorded in FERC Account 501; costs and revenues in FERC Accounts 547 and 518; emissions costs and revenues; and the components of purchased power and off-system sales specified in Kansas City Power & Light Company's ("KCP&L") existing FAC tariff. The rebuttal testimonies of Ameren Missouri witnesses Lynn M. Barnes and Andrew Meyer explain why these inclusions are appropriate.

4. With respect to question H, Ameren Missouri supports the position of Staff witness J Luebbert.

5. With respect to question I, for the reasons discussed in Ms. Barnes' and Mr. Meyer's rebuttal testimonies, and as was approved in KCP&L's last rate order, the provisions that allow the utility (or other parties) to make a filing to include costs or revenues under new charge types (which also can reflect revenues) established by a regional transmission organization between rate cases should be retained in FAC tariffs. The provision is transparent, fair, and workable, and has in fact worked to the advantage of Ameren Missouri's customers.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Statement of Positions was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 2nd day of February, 2017.

/s/ James B. Lowery

James B. Lowery