

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

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|-----------------------------------------|---|--------------------------|
| In the Matter of Union Electric Company |) | |
| d/b/a Ameren Missouri's Infrastructure |) | <u>Case No. GO-2015-</u> |
| System Replacement Surcharge (ISRS) |) | Tariff No. JG-2015-0298 |
| Reconciliation |) | |

STAFF MOTION TO SUSPEND TARIFF

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Suspend Tariff* in this matter hereby states:

1. On April 10, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") submitted a tariff sheet revising its rates for natural gas service, bearing an effective date of May 10, 2015. According to Ameren Missouri, the purpose of the revision is to reflect the results of its annual reconciliation of the Company's Infrastructure System Replacement Surcharge (ISRS). The Company states that its reconciliation shows an under-recovery, and therefore the tariff sheet reflects an increase in the residential sales customer class' monthly ISRS charge. The tariff has been assigned Tracking No. JG-2015-0298 and is attached here as Appendix A and incorporated by reference.

2. A gas utility's ISRS revenues are subject to refund based on a finding and order of the Commission, to the extent provided in subsections (5) and (8) of Section 393.1015 RSMo.¹

3. Subsection 5(2) of Section 393.1015 RSMo and Commission Rule 4 CSR 240-3.265(17) require that at the end of each 12-month calendar period the ISRS is in effect, the gas corporation shall reconcile the differences between the revenues resulting from an ISRS and the appropriate pretax revenues as found by the

¹ Commission Rule 4 CSR 240-3.265(4).

commission for that period “and shall submit the reconciliation and a proposed ISRS adjustment to the commission for approval to recover or refund the difference, as appropriate, through adjustments of an ISRS charge.”²

4. In Case No. GO-2014-0015, the Commission determined that Ameren Missouri should be allowed to recover annual ISRS surcharge revenues of \$1,266,546. Ameren Missouri filed a compliance tariff, which the Commission approved in an order that took effect on October 18, 2013.

5. As explained in the cover letter to Ameren Missouri’s reconciliation filing in this matter, the Company calculated the reconciliation for the 12-month calendar period of mid-October 2013 to October 2014.

6. Typically, gas utilities have included ISRS reconciliations along with petitions to change ISRS surcharges by adding newly installed eligible infrastructure system replacements, and Staff has reviewed the reconciliation along with the rest of the ISRS application. With this filing, however, Ameren Missouri is not requesting approval to recover the costs for new eligible infrastructure system replacements, but rather to reconcile the difference between the revenues resulting from the ISRS and the appropriate pretax revenues as found by the Commission in GO-2014-0015. Ameren Missouri submitted its reconciled ISRS tariff sheet bearing an effective date 30 days from the date of filing.

7. The 30-day effective date will not allow Staff sufficient time to perform a review of Ameren Missouri’s reconciliation and make a recommendation to the Commission. Therefore, Staff recommends the Commission suspend the tariff until

² Section 393.1015.5(2) RSMo.

August 8, 2015, which is 120 days from the time Ameren Missouri filed its tariff.³ Staff also recommends the Commission order Staff to submit its recommendation regarding the tariff sheet and Ameren Missouri's ISRS adjustment no later than June 9, 2015, which is 60 days after Ameren Missouri filed its tariff.⁴

8. This suspension will allow Staff reasonable time to review Ameren Missouri's calculations and submit a recommendation to the Commission, and allow any other party sufficient time to respond to Staff's recommendation prior to a Commission order.

9. Staff counsel has discussed this motion with counsel for Ameren Missouri and the Office of the Public Counsel. Public Counsel stated that it supports Staff's motion, and Ameren Missouri stated that it does not object to Staff's motion.

WHEREFORE, Staff recommends the Commission issue an order suspending Ameren Missouri's tariff attached here as Appendix A until August 8, 2015, and issue an order directing Staff to submit its recommendation regarding Ameren Missouri's filing in this matter no later than June 9, 2015.

³ Section 393.1015.2(3) requires the Commission issue an order to become effective not later than 120 days after an ISRS petition is filed.

⁴ Section 393.1015.2(2) provides that Staff may examine information of the gas corporation and may submit a report regarding its examination no later than 60 days after the petition is filed.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

John D. Borgmeyer
Deputy Staff Counsel
Missouri Bar No. 61992

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472
Fax: (573) 751-9285
Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 27th day of April, 2015.

/s/ John D. Borgmeyer

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER ISRS

INFRASTRUCTURE SYSTEM REPLACEMENT SURCHARGE

Description:

The ISRS is designed to recover the costs associated with the Company's eligible infrastructure replacements in accordance with the provisions of Sections 393.1009 to 393.1015, RSMo.

Applicability:

In addition to the other charges provided for in the Company's tariff, a monthly ISRS shall be added to each customer's bill for service rendered on and after the effective date of the ISRS.

Schedule of Surcharges:

The amount of the ISRS by rate schedule is as follows:

| | <u>*Per Bill Per Month</u> |
|-----------------------------------------------------------|--------------------------------|
| Residential Service Rate | \$0.78 |
| General Service Rate | \$1.51 |
| Interruptible Service Rate With An Assurance Gas Option | \$13.80 |
| Natural Gas Transportation Rate - Standard | \$1.50 |
| Natural Gas Transportation Rate - Large Volume | \$75.80 |
| Alternative Fuels - Interruptible Service | \$13.80 |
| Alternative Fuels - Transportation Service (Standard) | \$1.50 |
| Alternative Fuels - Transportation Service (Large Volume) | \$75.80 |

*Indicates Change.

DATE OF ISSUE April 10, 2015 DATE EFFECTIVE May 10, 2015

ISSUED BY Michael Moehn President St. Louis, Missouri
Name of Officer Title Address