

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

In the Matter of Union Electric Company            )  
d/b/a Ameren Missouri’s Filing to Modify Its        )  
Net Metering and Cogeneration Tariffs            )        **File No. ET-2013-0351**

**STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and files its Staff Recommendation with the Missouri Public Service Commission (“Commission”), stating the following:

1. Rule 4 CSR 240-3.155 (3) states that “All tariffs [providing for standardized rates for facilities at or under one hundred (100) kilowatts on design capacity] and other data required to be prepared and filed by electric utilities under the provisions of section (2) shall be submitted no later than January 15, 2005, and updated and revised on or before January 15 of every odd-numbered year after that, unless otherwise ordered by the commission.”

2. Rule 4 CSR 240-20.065 (8) states that “Each electric utility shall file on or before January 15 of each odd-numbered year for the commission’s approval in the electric utility’s tariff, a rate schedule with a net metering rate that is the same rate as the utility’s cogeneration rate.”

3. On January 9, 2013, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed three (3) revised tariff sheets to revise the rates paid for energy purchased from customers with a Qualifying Facility under Rules 4 CSR 240-3.155 and 4 CSR 20.060, or a Net Metering Installation under Rule 4 CSR 240-20.065. One of the tariff sheets, Sheet 19, also corrects a typographical error on the Interconnection Application/Agreement For Net Metering Systems With Capacity of 100

kW Or Less. Ameren Missouri also provided supporting data to Staff as required by Rule 4 CSR 240-3.155 (4).

4. Ameren Missouri requests expedited treatment under Rule 4 CSR 240-2.080 (14) for approval of the tariff sheets. Ameren states in its filing that it requests expedited treatment so it can file new electric rate schedules consistent with the Commission approved *Non-Unanimous Stipulation and Agreement Regarding Certain Revenue Requirement Issues* in Case No. ER-2012-0166.

5. On January 10, 2013, the Commission issued its *Order Establishing Time To File Recommendation (Order)*, directing the Staff to file a recommendation on the revised tariff sheets no later January 18, 2013. This Staff Recommendation complies with that *Order*.

6. Ameren Missouri proposes to increase the cogeneration summer rates by 4.0% (from \$0.0198/kWh to \$0.0206/kWh), the winter rates by 8.6% (from \$0.0175/kWh to \$0.0190/kWh) and would also make similar changes to the time-differentiated energy rates.

7. Staff has reviewed the avoided cost data Ameren Missouri provided and has determined that this data is consistent with Ameren Missouri's previous cogeneration rate change tariff filing made in 2011, but with updates to reflect current costs and plans.

8. Since Ameren Missouri's avoided costs calculations are consistent with the previous cogeneration filings, the net metering rate is the same as the utility's cogeneration rate and Staff has determined that the changes to the tariff sheets are

appropriate, Staff recommends that the Commission approve the tariff sheets to go into effect on January 24, 2013, on an expedited basis:

9. Staff has verified that Ameren Missouri has filed its required Annual Reports and is not delinquent on any assessment. Staff is not aware of any other pending matter that affects this filing or that is affected by this filing.

**WHEREFORE**, Staff files this Recommendation for the Commission's information and consideration and requests the Commission approve the following tariff sheets, to go into effect on January 24, 2013, on an expedited basis:

P.S.C. MO. SCHEDULE NO. 1

6<sup>th</sup> Revised SHEET NO. 2 Cancelling 5<sup>th</sup> Revised SHEET NO. 2  
5<sup>th</sup> Revised SHEET NO. 9 Cancelling 4<sup>th</sup> Revised SHEET NO. 9  
2<sup>nd</sup> Revised SHEET NO. 19 Cancelling 1<sup>st</sup> Revised SHEET NO. 19

Respectfully submitted,

**/s/Jennifer Hernandez**

Jennifer Hernandez  
Senior Staff Counsel  
Missouri Bar No. 59814

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751- 8706 (Telephone)  
(573) 751-9285 (Fax)  
[jennifer.hernandez@psc.mo.gov](mailto:jennifer.hernandez@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served electronically on this **18th day of January, 2013**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

**/s/Jennifer Hernandez**