

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GR-2012-0077 File No. YG-2012-0167
Union Electric Company d/b/a Ameren Missouri

FROM: Tom Solt, Energy Department – Tariffs/Rate Design

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| <u>/s/ Thomas M. Imhoff 10/21/11</u> Utility Operations Division/Date | <u>/s/ Lera Shemwell 10/21/11</u> General Counsel's Office/Date |
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SUBJECT: Staff Recommendation for Union Electric d/b/a Ameren Missouri Winter PGA Tariff
Filing - Effective November 1, 2011

DATE: October 21, 2011

On October 17, 2011, Union Electric Company d/b/a Ameren Missouri (Ameren or Company), of St. Louis, Missouri, filed two (2) tariff sheets bearing an effective date of November 1, 2011. These tariff sheets were filed to reflect changes in Ameren's PGA factors as a result of estimated changes in the cost of natural gas and changes in the ACA component. Ameren requests that the tariff sheets go into effect on November 1, 2011.

For all of its natural gas service areas, other than the Rolla Service Area, the PGA rate filed by Ameren will increase to \$0.2778 per hundred cubic foot (Ccf) for the first 30 Ccf from the current PGA rate of \$0.2578 per Ccf. For all Ccfs in excess of the first 30 Ccf, the PGA rate filed by Ameren will increase to \$1.0730 per Ccf from the current PGA rate of \$1.0530 per Ccf. These changes represent an increase of \$0.0200 per Ccf.

For its Rolla Service Area, the PGA rate filed by Ameren will increase to \$0.4179 per Ccf for the first 30 Ccf from the current PGA rate of \$0.3678 per Ccf. For all in excess of the first 30 Ccf, the PGA rate filed by Ameren will increase to \$1.2131 per Ccf from the current PGA rate of \$1.1630 per Ccf. These changes represent an increase of \$0.0501 per Ccf.

Case No. GR-2012-0077, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2010-2011 ACA filing. Case No. GR-2010-0180 was established to track the Company's PGA factors to be reviewed in its 2009-2010 ACA filing. Case No. GR-2009-0337 was established to track the Company's PGA factors to be reviewed in its 2008-2009 ACA filing. Case No. GR-2008-0366 was established to track the Company's PGA factors to be reviewed in its 2007-2008 ACA filing. Case No. GR-2008-0107 was established to track the Company's PGA factors to be reviewed in its 2006-2007 ACA filing. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2012-0077, GR-2010-0180, GR-2009-0337, GR-2008-0366, and GR-2008-0107.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Unit (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 31, 2012.

Staff has verified that this company 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.

Staff has reviewed this filing and has determined that it was calculated in conformance with Ameren'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's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff recommends that the following tariff sheets as filed on October 17, 2011 be approved, interim, subject to refund:

P.S.C. MO. No. 2

101th Revised SHEET No. 30 Cancelling 100th Revised SHEET No. 30

15th Revised SHEET No. 30.1 Cancelling 14th Revised SHEET No. 30.1

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086