

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri’s Tariffs to Increase Its Revenues for) File No. ER-2014-0258
Electric Service.)

**AMEREN MISSOURI’S RESPONSE TO OFFICE OF THE
PUBLIC COUNSEL’S REQUEST FOR ORDER**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its response to the *Request for Order* (the “Request”) submitted by Office of the Public Counsel (“OPC”) on September 24, 2014, states as follows:

1. OPC’s Request alleges that Ameren Missouri’s July 3, 2014 rate case filing did not comply with 4 CSR 240-3.161(3)(H) and (I), or with 3.161(3)(A), each of which provide for certain filing requirements (applicable when an electric utility seeks to continue its fuel adjustment clause (“FAC”)). The above-cited filing requirements are materially the same as the filing requirements that apply when an electric utility first seeks to establish a FAC.

2. Ameren Missouri and other electric utilities in the state have been requesting to establish and to continue FACs pursuant to these rules since 2006, after Section 386.266, RSMo. (Cum. Supp. 2013) was adopted by the General Assembly in 2005.¹ In fact, this case is the sixth time Ameren Missouri has made a rate case filing that includes the information required by the

¹ The FAC rules actually became effective on January 30, 2007, but they had been proposed before both Ameren Missouri and Aquila, Inc. (now Kansas City Power & Light Company – Greater Missouri Operations Company (“KCP&L-GMO”)) filed rate cases in 2006. Ameren Missouri’s rate case filing included compliance with the FAC rules as proposed, which were not materially changed in the final rules that became effective. It should also be noted that Kansas City Power & Light Company has not utilized the FAC rules because of its agreement not to seek an FAC until a later time pursuant to its 2005 Regulatory Plan.

filing requirements at issue.² All of Ameren Missouri’s prior filings have contained substantially the same information as that contained in its current filing, except to the extent a fact has changed or a FAC term has changed such that the content of the filings themselves needed to be changed. Not only has the Commission approved the Company’s FAC based on those filings (indicating that the filings were in fact in compliance with the Commission’s FAC rules), but no party (including OPC), until now, has ever claimed that Ameren Missouri’s filings have failed to comply with the filing requirements.

3. OPC claims that if one dissects the filing requirements and applies them to Ameren Missouri’s filing in this case one would conclude that “Ameren has wholly failed to comply.”³ As outlined below, Ameren Missouri could not disagree more.

a. The filing requirements do not require that an electric utility provide, as part of the filing requirements themselves, the underlying data necessary to replicate the various calculations called for by the FAC.

4. OPC’s theory underlying its claim that Ameren Missouri’s filing is deficient is that the listing of every Uniform System of Accounts (“USoA”) account into which costs and revenues under the FAC are recorded, a description of those costs and revenues, and additional explanation about the costs and revenues is not complete enough, apparently because OPC cannot take the information in the “minimum filing requirements” attached as Schedule LMB-1 to the direct testimony of Ameren Missouri witness Lynn M. Barnes and then perform a

² KCP&L-GMO and The Empire District Electric Company (“EDE”) have also utilized the FAC rules regarding these filing requirements on several occasions.

³ OPC Request at 3.

“calculation” to “reproduce what Ameren is suggesting should flow through the rider.”⁴ But providing a “complete explanation” of the costs and revenues included in the FAC does not contemplate or require including in the minimum filing requirements all of the raw data applicable to the period used to re-base the FAC for that particular rate case. Instead, the complete explanation contemplated is a narrative explanation of the costs and revenues that are to be included in the FAC.⁵ That is exactly what Ameren Missouri has provided in this case, and all of the previous cases in which it has sought approval of a FAC.

5. Attached hereto as Exhibit A⁶ is Ameren Missouri’s submission of these filing requirements (minus part of the attachments, which total hundreds of pages) in this case. This submission is substantially the same as Ameren Missouri’s submissions in its prior five rate cases where it sought to establish or continue a FAC. The information required by subsections (H) and (I) is reflected at pages four through eight of Exhibit A. As the Commission can see, every single USoA account to which costs or revenues are recorded is listed, together with a description of the account. Moreover, additional narrative explanations of the costs and revenues are contained in the submission preceding the tables that list the accounts.

6. When one considers the history of applying the requirements of the rule over the past seven years and the purpose of the filing requirements (as compared to other data

⁴ OPC Request at 4-5.

⁵ An analogy may be helpful in illustrating this point. If one were asked to provide a “complete explanation” of all of the costs and revenues included in the federal budget one would not expect to provide all of the raw data that went into the calculation of the 2014 federal budget, allowing the reader to reproduce the budget for that one period. Instead, a complete explanation would include the categories of costs and revenues that would be included in any budget year.

⁶ Exhibit A is Schedule LMB-1 to the direct testimony of Ameren Missouri witness Lynn M. Barnes.

submissions, which we discuss below), it becomes apparent that the Company's submission constitutes the "complete explanation" called for by the rules.

7. The rules require a complete explanation of the costs and the revenues and a specification of the accounts where they are recorded. While the rules do not define what "complete explanation" means, had the Commission intended that it constitutes a numerical representation of the costs and revenues including all of the facts, figures and detailed accounting entries or other items needed to perform mathematical calculations, the Commission (a) surely would have said so in its rules, (b) the Commission's Staff and large number of parties to not only Ameren Missouri's prior rate cases, but to KCP&L-GMO's and The Empire District Electric Company's ("EDE") rate cases as well, surely would have so argued well before now, and (c) the Commission surely would have found that the Company's prior filings were deficient. Put another way, if the rule required figures and data and numbers instead of a narrative explanation and a listing of the affected accounts the Commission would have said so. We noted earlier that the Company's submission in this case is substantially the same as in its prior cases when it requested to establish or continue a FAC and we noted that not once has any party, including specifically the Commission's own Staff, ever claimed that Ameren Missouri has failed to comply with any of the provisions of the rules OPC complains about now. Indeed, the Staff has previously indicated that it agrees that the Company's submissions comply with the FAC rule minimum filing requirements.

8. For example, in its Cost of Service Report filed in the first case Ameren Missouri filed where it sought to continue the FAC it implemented in 2009, the Staff (via Staff witness John Rogers) stated that "Staff has reviewed the minimum filing requirements documents AmerenUE provided in Schedule LMB-E1-1 attached to the prefiled direct testimony of

AmerenUE witness Lynn M. Barnes and *believes that with these documents AmerenUE has complied with the minimum filing requirements contained in 2 4 CSR 240-3.161(3) . . .*” (emphasis added).⁷ While Mr. Rogers was the affiant sponsoring the referenced pages of the Staff Report, Lena Mantle was the Staff’s FAC witness in that case and in each subsequent Ameren Missouri rate case, until this one. In fact, Ms. Mantle has touted that she was one of the “principle [sic] drafters” of the FAC rules, and she was also Mr. Rogers’ supervisor when he and the Staff confirmed that Ameren Missouri’s submissions in fact do comply with the FAC rules that OPC now claims are not being followed by Ameren Missouri. Ms. Mantle has since retired from the Commission, but is now acting as OPC’s consultant on FAC issues in this case. In fact, Ms. Mantle has submitted data requests seeking the data, facts, and figures she apparently wants so that OPC can perform the calculations it claims it cannot perform. The Company will respond with such data to the extent OPC does not already possess it.

9. OPC also complains about the level of account detail provided by Ameren Missouri’s submissions, noting that the Company utilizes “minor” accounts and claiming that the rule does not simply require a listing of “major” accounts. OPC provides no support for its contention. While the FAC rules do not define “accounts,” there is a long history at the Commission of interpreting the word “account” to mean “Uniform System of Account Number X, Y or Z.” Indeed, the Commission requires electric utilities to keep their books in accordance with the USoA. 4 CSR 240-20.030. That the Company has chosen to establish “minors” (or subaccounts, as OPC also describes them) *under* the accounts prescribed by the USoA does not mean that the FAC rule is referring to those subaccounts, which are developed by the Company

⁷ *Staff Cost of Service Report*, pp. 105-106 and Affidavit of John A. Rogers (Case No. ER-2010-0036).

(and not the FERC) for the Company's managerial accounting purposes. There is no such thing as a "minor" or "subaccount" under the USoA for any of the accounts that impact the FAC, and the Company is aware of no Commission rule that refers to an "account" that has ever been applied or interpreted to require a listing of any minor account that the utility may choose to (but is not required to) establish for managerial accounting purposes. When the Commission uses the term "account" it refers to the USoA accounts, not subaccounts an individual utility may or may not establish, and which vary among different utilities. The Company's FAC filing requirements submission included *all* USoA accounts into which costs or revenues that impact the FAC are recorded.

10. OPC also claims that there are costs "not completely explained in and supported by testimony" and refers to a comparison of "Doc. No. 9" to the FAC tariff itself (attached to Ms. Barnes' testimony as Schedule LMB-3) and a comparison of "Doc. No. 9" (an apparent reference to an EFIS document number) to the FAC filing requirements submission contained in Exhibit A hereto. "Doc. No. 9" appears to be the *non-FAC* minimum filing requirements that must be filed when a rate case is filed pursuant to 4 CSR 3.030 – it has nothing to do with any of the FAC filing requirements. What OPC appears to be saying in that there should have been some kind of detailed description of "every MISO cost" somewhere since there is a detailed description of each MISO schedule under which costs are submitted to Ameren Missouri in the FAC tariff. Again, Ameren Missouri has been recording MISO costs to the FERC accounts listed in the filing requirements submission since it established its FAC in 2009. The Commission has never found any deficiency in the Company's FAC-related filings, and no party has ever claimed the submissions were deficient (that includes OPC), and the Staff, as earlier noted, affirmatively confirmed the Company's submissions were not deficient and indeed were

in compliance with the FAC filing requirements. All of the MISO costs are recorded in one of the FERC accounts that the Company listed in its FAC submission (Exhibit A hereto; Schedule LMB-1). The USoA describes each FERC account; Ameren Missouri also provided a description in Exhibit A. Details on each MISO schedule for which costs are included in the FAC can be accessed by anyone, including OPC, on MISO's website. The FAC tariff itself, which was included with Ms. Barnes' testimony, lists each MISO schedule. It is simply not true that the "testimony" (which includes the filing requirements, Exhibit A hereto) fails to support the tariff sheet.⁸

11. OPC sums up its claims by claiming it will experience "prejudice" in its ability to contest this case "due to an expenditure of time and energy needed to track down accounting entries."⁹ This case was filed nearly three months ago. OPC and all of the other parties have been afforded approximately five months to audit the Company's rate case filing and to conduct discovery. As discussed below, OPC has had every single one of Ameren Missouri's monthly FAC reports since the inception of the FAC, and has had Ameren Missouri's workpapers in this case which contain the details, facts and figures behind the calculation of net base energy costs for this case. OPC has (only recently) sent discovery directed toward the issues it raises in its Request, which as noted will be answered.

12. We noted earlier that the thrust of OPC's Request is that subsections (H) and (I) require (says OPC) data, facts and figures needed to reproduce FAC-related calculations. We

⁸ With respect OPC's "example" of a cost "not included in Ameren Missouri's proposed tariff sheets – water for power – the Company has not had to purchase any water to generate power and the inclusion of the description was an error. Account 536 is not covered by the FAC tariff, which is controlling.

⁹ OPC Request at 6.

have already outlined why OPC's interpretation of the rule is incorrect. But we would note that if OPC wants to reproduce FAC-related calculations it has the information it needs to do so.

13. In this case there is only one FAC-related calculation that impacts the rates that will be set – the net base energy cost (“NBEC”) calculation that is included as Schedule LMM-17 to the Direct Testimony of Ameren Missouri witness Laura Moore. This is because in a rate case where, as here, the FAC is “re-based,” the only FAC charges or credits that will arise when the FAC is adjusted later will arise based upon future *changes* to the NBEC that the Commission establishes in the rate case. OPC has had the workpapers underlying the NBEC calculation for this case since shortly after the case was filed. OPC can reproduce the calculation of each component of NBEC from those workpapers. Subsections (H) and (I) do not require that the workpapers be submitted, although as is customary the Company provided them essentially concurrently with its rate case filing.

14. Ameren Missouri's monthly FAC reports also contain the facts, figures and detail needed to calculate the charges and revenues shown as incurred/received for inclusion in the FAC for the month being reported. Indeed, a few rate cases ago the Company met with representatives of the Staff, OPC and the Missouri Industrial Energy Consumers and worked with them to come to an agreement on significant additions to the monthly report that were designed to facilitate their ability to replicate the Company's calculations. The FAC rules *do not* require those details to be in the monthly reports, but the Company has *nonetheless been providing that detail for several years*.

15. In summary, Ameren Missouri's rate case filing contained everything required by subsections (H) and (I). Only OPC, after having no such complaint in the five prior cases, and OPC's consultant, having testified in all five of those cases and also having never accused the

Company of not complying with subsections (H) and (I) (indeed, OPC's witness' direct report agreed the Company had complied), now wants to amend the rule to require something more (OPC doesn't really specify exactly what it is asking for). But that something more, the data to replicate FAC-related costs and revenues, is not required to be filed by the rules and it is already in OPC's possession, including for every month going back several years, and for the replication of the Company's NBEC calculation in this case.

b. The Company has also complied with Subsection (A).

16. OPC makes one additional claim about the Company's FAC-related submittals, claiming that the sample notice on page 1 of Exhibit A hereto does not comply with 3.161(3)(A). OPC's argument is that since the notice is required to state how the FAC charge will be "applied" it must necessarily state whether it is charged based upon the customer's energy consumption or based on some other factor.¹⁰

17. Neither Ameren Missouri nor the Staff nor any other utility with an FAC nor any other party to any prior rate case applying Subsection (A) has ever understood Subsection (A) to require what OPC now says it requires. Indeed, OPC never claimed it required as much until now. Ameren Missouri's sample notices have never specified that the FAC is charged based on energy usage, nor have the notices of KCP&L-GMO or EDE. The notices that actually are sent in each rate case are *approved by the Commission itself* before the notices are sent. No Commission-approved notice has ever contained such information. Typically, it is *OPC* that actually proposes the specific notice. For example, in the Company's last rate case a joint pleading was filed (signed by OPC) which stated that "Public Counsel submits the following

¹⁰ OPC Request at 6-7.

notice, with which Staff concurs”,¹¹ followed by the notice, which was very similar to the sample the Company submitted and which did not contain the additional detail OPC now insists is needed to adequately “inform . . . the customer of the nature of the request before the Commission . . . [so that] customers . . . [can] exercise their rights in this process and, perhaps more vitally to the customer, for them to plan properly for their expenses.”¹²

18. The rule did not suddenly start requiring something different now seven years later, unless one is to conclude that everyone – the Commission, its Staff, OPC and the utilities included – have all gotten it wrong the entire time. It frankly makes little sense for the notice to include the detail OPC now claims it must. No one knows what the future FAC charges (or credits) will be when the rate case notice is sent for, as we explained above, no FAC charge arises from the rate case since the costs and revenues are rebased to zero in this rate case.¹³

c. Ms. Barnes’ Direct Testimony Does Not “Lack Foundation”.

19. OPC complains that Ameren Missouri’s direct testimony is somehow deficient because it is “bare-bones” as evidenced, OPC says, by the fact that that when Ameren Missouri files direct testimony that testimony ends up “contested in rebuttal testimony.”¹⁴ By OPC’s logic, unless a utility’s direct testimony ends up being “noncontested” the testimony was somehow “inadequate.” But contesting the contentions in direct testimony, including on the

¹¹ Proposed Procedural Schedule, Case No. ER-2012-0166, p. 4.

¹² OPC Request at 7.

¹³ If the Commission believes including in the notice a statement explaining that the FAC charge or credit is based on energy usage then the Company has no objection to doing so, but that does not mean the rule itself requires the notice to contain such information.

¹⁴ OPC Request at 8.

grounds that they lack support, is generally what rebuttal testimony is for and the fact that direct testimony is “contested” proves nothing about the sufficiency of the testimony. If, as OPC claims, the testimony lacks the support OPC contends it ought to have then OPC should do what it has already done: take some of the five months until other parties’ direct cases are due to conduct discovery to probe the basis for the testimony of the Company’s FAC witness. In fact, OPC has recently submitted data requests that ask for documentation and further explanations about the basis of all of the “problematic examples” it cites.

20. When testifying on direct, expert witnesses are not required to outline the details of the basis of all of their opinions. Whether in Commission cases with prefiled testimony or in a civil case where the expert take the witness stand on direct and for the first time is examined by his own lawyer, the details behind the expert’s ultimate opinions may or may not be elicited. On cross-examination the opponents can and likely would try to undermine those opinions of the opponent if it was believed there was not a sound basis behind them. The opponent may have deposed the expert before the trial and, at that deposition, may have required the production of the documents relied upon by the expert in forming its opinions, or may have otherwise conducted discovery of the basis of the expert’s opinion. OPC can (and as noted, has recently started) engage in just such discovery.

d. OPC’s Conclusion Should Be Seen for What It Is: A Hyperbolic Attempt to Prevent the Company from Continuing its FAC.

21. It is perfectly permissible for OPC to oppose continuation of the Company’s FAC if that is the position OPC plans to take in this case. It is not appropriate for OPC to ask the Commission to make up the rules governing FAC requests as it does along, which is in substance what OPC’s Request does. The reality is that OPC’s new twist on what they require certainly

was not “obvious” to anyone, including to the Commission, the Staff, other parties, utilities and even OPC, until OPC proposed its new interpretation a few days ago. And there is no basis whatsoever for OPC’s accusation that the Company is engaging in “dilatory behavior.”¹⁵ The Company has provided all of the required FAC minimum filing requirements and is working diligently to answer the data requests recently submitted by OPC.

22. There are no “deficiencies” to cure. The Company has complied entirely with the Commission's FAC rules. OPC has what it needs to replicate whatever calculations it desires and has had that information for months. OPC’s Request should be denied.

WHEREFORE, the Company prays that the Commission make and enter its order denying OPC’s Request.

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Dated: October 1, 2014

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¹⁵ OPC Request at 9.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 1st day of October, 2014.

/s/James B. Lowery
James B. Lowery

FAC MINIMUM FILING REQUIREMENTS¹

(A) An example of the notice to be provided to customers as required by 4 CSR 240-20.090(2)(D);

LOCAL PUBLIC HEARING NOTICE

Ameren Missouri has filed tariff sheets with the Missouri Public Service Commission (PSC) that would increase the company's electric service revenues by approximately \$264 million. Included in this amount is an increase in the level of net energy costs that are recovered in base rates of approximately \$127 million, which will have the effect of making the company's fuel adjustment clause charges lower in the future than they otherwise would have been. The overall request would raise a typical residential customer's bill by approximately 9.65%, translating to just more than an approximately \$9.50 monthly increase. The permanent rate increase request, which is subject to regulatory approval, would take effect no later than January 2013. Ameren Missouri's rate filing also includes a request to continue its fuel adjustment clause in substantially its current form which would continue to allow 95% of increases or decreases in net energy costs to be passed through to customers as a separate line item on customer's bills.

Public comment hearings have been set before the PSC as follows:

[To be determined by the Commission]

If you are unable to attend a live public hearing and wish to make written comments or secure additional information, you may contact the Office of the Public Counsel, P.O. Box 2230, Jefferson City, Missouri 65102, telephone (573) 751-4857, email opcservice@ded.mo.gov or the Missouri Public Service Commission, Post Office Box 360, Jefferson City, Missouri 65102, telephone 1-800-392-4211, email pscinfo@psc.mo.gov. The Commission will also conduct an evidentiary hearing at its offices in Jefferson City during the weeks of _____ through _____, beginning at _____ a.m. The hearings and local public hearings will be held in buildings that meet accessibility standards required by the Americans with Disabilities Act.

If a customer needs additional accommodations to participate in these hearings, please call the Public Service Commission's Hotline at 1-800-392-4211 (voice) or Relay Missouri at 711 prior to the hearing.

(B) An example customer bill showing how the proposed RAM shall be separately identified on affected customers' bills in accordance with 4 CSR 240-20.090(8);

Attached hereto as Attachments A and B are two different examples of customer bills (one in the postcard format used by Ameren Missouri for residential customers and one in the billing format used by Ameren Missouri for non-residential customers), as required by 4 CSR 240-20.091(8).

¹ Each item (A) (T) corresponds to the subparagraphs in 4 CSR 240-3.161(3).

(C) Proposed RAM rate schedules;

Attached to the testimony to which this Schedule is attached as Schedule LMB-3 is Rider FAC - Fuel and Purchased Power Adjustment Clause, which is the proposed rate schedule for the fuel adjustment clause proposed by Ameren Missouri, and which shows minor changes to the existing Rider FAC as outlined in the testimony.

(D) A general description of the design and intended operation of the proposed RAM;

As discussed in the testimony to which this Schedule is attached, Ameren Missouri is proposing to continue its existing Fuel and Purchased Power Adjustment Clause (“FAC”) in substantially its current form. The FAC applies to all rate classes, and would reflect increases or decreases in fuel and purchased power costs, including transportation and emission costs and revenues, net of off-system sales revenues (“actual net energy costs”), according to the formula expressed in the rate schedule referred to in item (C) above. Historic fuel and purchased power costs, including transportation and emission costs and revenues, net of off-system sales revenues, would be accumulated during three different Accumulation Periods, as designated in the rate schedule, and then 95% of the change in actual net energy costs would be recovered (if an increase) or credited (if a decrease) using the calculated FAR (as defined in the rate schedule) over three different Recovery Periods (also designated in the rate schedule), each of which cover a period of 8 months. Two of the three changes to the FAR would coincide with the existing seasonal changes in Ameren Missouri’s base rates. The tariff includes two seasonal base amounts, known as the “base factor” (factor BF in the tariff), against which changes in actual net energy costs are tracked. The FAR would be applied to customer bills on a per kilowatt-hour (“kWh”) basis, as adjusted for voltage level (to take into account varying line losses at different service voltage levels).

The FAR formula includes a factor to accommodate adjustments made as a result of the true-up process or any prudence disallowances occurring as a result of prudence reviews; and an “N” factor to address reductions of rate class 12(M) billing determinants under certain conditions specified in the tariff.

(E) A complete explanation of how the proposed RAM is reasonably designed to provide the electric utility a sufficient opportunity to earn a fair return on equity;

Ameren Missouri’s continued FAC tariff, which is substantially the same as its existing FAC, continues to be reasonably designed to provide Ameren Missouri with a sufficient opportunity to earn a fair return on equity for several reasons. First, it provides for full and timely recovery of 95% of the changes in Ameren Missouri’s actual net energy costs (which, in general terms, consist of fuel and purchased power costs, including transportation and emission costs and revenues, net of off-system sales revenues), by reflecting increases and decreases in such costs in rates. The 5% of changes not passed through the FAC provide the Company with additional incentives to manage fuel and purchased power costs, but still provide recovery of 95% of those costs.

Full and timely recovery of 95% of those costs is based upon the assumption that an appropriate level of costs and revenues that are tracked in the FAC will be set in base rates based upon these costs in the test year, as updated and trued-up in the rate case, and it also assumes appropriate base rate recovery of other cost of service items. With the FAC, it is more likely that fuel and purchased power costs, which are often times much more significant, volatile, uncertain and much more difficult to control than other utility costs, will be timely and fairly reflected in the rates charged to customers. Examples of factors that can often make these very large but critical costs highly volatile, uncertain and beyond the utility's control include the fact that fuel and purchased power is purchased on national markets which are subject to increasing volatility due to global demand, increased trading activities, world events, financial crises, weather (e.g. hurricanes), abnormally hot or cold weather, or other factors. Second, the FAC assists in addressing the relentlessly increasing, volatile and uncertain fuel costs incurred by the Company in providing service to its customers. Third, a continuation of the FAC continues to keep Ameren Missouri on comparable footing with utilities operating in other states, more than 95% of which use similar rate adjustment mechanisms. Moreover, it will keep Ameren Missouri on equal footing with the overwhelming majority of other non-restructured Midwestern states, including the heavily coal-based utilities in these other states. Fourth, the FAC continues to be reasonably designed to provide Ameren Missouri with a sufficient opportunity to earn a fair return on equity because it mitigates the very significant regulatory lag which is prevalent when dealing with such large, uncertain and often volatile costs, by preventing deterioration in the utility's financial position (including relative credit standing, which is a key determinant of borrowing costs), particularly in the face of known fuel cost increases facing Ameren Missouri, and by ensuring recovery of actual net energy costs, which may vary substantially from expected levels.

(F) A complete explanation of how the proposed FAC shall be trued-up to reflect over- or under-collections, or the refundable portion of the proposed IEC shall be trued-up, on at least an annual basis;

The FAC will be trued-up on the first filing date for an adjustment to the FAR that occurs at least two months after the end of each 8-month recovery period. Interest will be calculated on true-up adjustments and included as interest (factor "I") in the calculation of the FAR, as provided for in the FAC tariff.

True-up amounts will reflect the difference between the Fuel and Purchased Power Adjustment ("FPA" as defined in the calculation of the FAR provided for in the FAC tariff) authorized for recovery under the FAC for the subject recovery period and FAR customer revenues actually collected. FAR customer revenues can vary from those expected in calculating the FAR because of variations in the actual kWh sales during a given recovery period versus the estimated kWh sales used to set the FAR in effect during a given recovery period. Additionally, the FAR calculated can vary from the amount originally authorized due to updates of factor "S_{AP}", as defined in Rider FAC. Updates to factor S_{AP} occur as a result of S105 Midcontinent Independent System

Operator, Inc. (“MISO”) settlement statements². The MISO settlement statements provide the KWh data for the amount of energy Ameren Missouri purchased to serve its load zone and is multiplied by factor “BF”, as defined in Rider FAC, to determine the dollars of net base energy costs (factor “B”) used to calculate the FPA.

(G) A complete description of how the proposed RAM is compatible with the requirement for prudence reviews;

Ameren Missouri’s FAC is compatible with the requirement for prudence reviews for several reasons. Ameren Missouri’s FAC is based on actual fuel and purchased power costs, including transportation and emission costs and revenues, net of actual off-system sales revenues, which simplifies the prudence review. The fuel and purchased power costs included in the FAC are well defined in Rider FAC (the FAC tariff), including specific references to the FERC accounts in which the costs are recorded. Moreover, 4 CSR 240-3.161(5), requires the filing monthly of all the supporting data for the fuel and purchased power costs, revenues, plant generation and related information, all of which can be used as part of the prudence review process. These reports are currently being submitted by Ameren Missouri on a monthly basis. This includes providing monthly fuel burn and generating statistics for each of the generating plants. In addition, 4 CSR 240-3.190 requires submission to the Commission Staff each month of information on system output, hourly generation, purchases and sales, planned outages, forced outages and capacity purchases. All contracts for fuel, transportation and purchased power will also be available for review in connection with the prudence review process. The prudence review could also be used in conjunction with an audit plan, through which appropriate financial data can be sampled from the fuel and fuel transportation invoices that will be available.

(H) A complete explanation of all the costs that shall be considered for recovery under the proposed RAM and the specific account used for each cost item on the electric utility’s books and records;

These costs are generally described as follows:

Coal Commodity Costs. This will include costs associated with purchase of coal, as well as British thermal unit (“btu”) content adjustments and sulfur content quality adjustments associated with coal contracts. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the coal inventory account and allocation of dollars to each plant will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

Coal Transportation Costs. This will include costs associated with transportation of coal, as well as fuel adjustments (e.g., diesel surcharges) associated with transportation contracts and price hedging mechanisms. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as coal is used. A detailed

² “S105” stand for 105 days after the end of the period covered by the settlement statement.

accounting of all additions and adjustments to the coal inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period. Railcar costs are included in this account, and a separate accounting of all railcar costs flowing through inventory will be maintained as well as the allocation of costs to plant inventory accounts.

Oil Costs. This will include costs associated with oil and any price hedging mechanisms. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the oil inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

Natural Gas Costs. This will include costs associated with the gas commodity, storage, reservation, transportation, and hedging costs associated with gas-fired plants. A detailed accounting of all additions and adjustments to inventory will be included in a reconciliation, including the calculation of fuel expenses recorded during the accounting period. Also included will be details of all direct costs to expense.

Water for Power. This will include costs associated with water used for hydraulic power generation. Details of water purchased for power will be included in a reconciliation.

Nuclear Fuel Costs. This will include costs associated with nuclear fuel. These costs are accumulated in inventory accounts under FERC Account 120, and amortized on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

Cost of Purchased Power. This will include the cost at the point of receipt by the Company of electricity purchased for resale. It shall include, also, net settlements for exchange of electricity or power, such as economy energy, off-peak energy or on-peak energy, ancillary services, etc. In addition, this category will include costs incurred from regional transmission organizations (“RTOs”) for Revenue Sufficiency Guarantee, Losses, deviation charges, revenue neutrality, inadvertent charges, congestion and firm transmission rights but shall exclude MISO administrative costs arising under MISO Schedules 10, 16, 17 and 24, and shall exclude capacity charges under contracts with a term in excess of one (1) year.

The following table summarizes this information by account:

Type of Cost	Inventory Major	Expense Major	Description
Coal Commodity	151	501	Cost of coal delivered at the mine
Applicable Taxes	151	501/547/518	Applicable taxes on fuel and transportation costs
Btu	151	501	Added/subtracted amounts to coal contracts for

adjustments			btu content of coal
Coal Quality (sulfur) adjustments	151	501	Added/subtracted amounts to coal contracts for sulfur content of coal
SO ₂ Hedge costs/revenues	151	501	Costs/Revenues associated with price hedges related to coal contract SO ₂ adjustments
Railroad, truck and barge transportation	151	501	Costs associated with delivering coal from mine to plant
Switching & Demurrage	151	501	Costs associated with switching and demurrage costs incurred in delivering coal from the mine to the plant
Railcar repair	151	501	All railcar costs will be aggregated in a separate minor account under major Account No. 151. As part of the monthly closing process, these costs will be allocated to transportation inventory at the plants based on tonnage delivered during the period.
Railcar depreciation	151	501	
Railcar leases	151	501	
Railcar inspection	151	501	
Heating Oil Hedge costs/revenues	151	501	Costs/revenues associated with price hedges related to diesel fuel adjustments in coal transportation contracts
Hedge costs associated with coal	151	501	Costs/revenues associated with price swaps, options, or other derivatives to manage fuel costs
Commissions and fees	151	501	Broker costs and commissions associated with hedging activities of coal commodity and transportation
Oil	151	501/547	Costs associated with oil used at plants for generation and start-up fuel
Air Quality Control Systems (AQCS) Consumables	154	502	Cost of consumables such as urea or anhydrous ammonia, limestone and powder activated carbon used to operate AQCS.
Nuclear Fuel	120	518	Costs associated with nuclear fuel, including provisions for transportation, storage and disposal of nuclear fuel including spent fuel disposal fees, and handling costs for nuclear fuel assemblies.
Water for Power	Expensed	536	Costs associated with water used for hydraulic power generation
Natural Gas	151/Direct Expense	501/547	Costs associated with natural gas used at plants for generation and start-up fuel
Ash Disposal Costs	Direct Expense	501	Cost to dispose of ash, net of ash revenues
Other Portfolio	151	501/547	Revenues and expenses related to selling

optimization activities			excess coal or natural gas and other portfolio optimization activities
Purchased Power Costs	Direct Expense	555, 565, 575 and 924	Sums billed by MISO or another seller of power for purchased power, including transportation charges, but excluding MISO administrative costs under MISO Schedules 10, 16, 17 and 24, and excluding capacity charges under contracts with a term in excess of one (1) year, incurred to support sales to all Missouri retail customers and off-system sales. Also included are replacement power insurance premiums to the extent those premiums are not reflected in base rates. Change in replacement power insurance premiums from the level reflected in base rates shall increase or decrease purchased power costs. See Item (I) below relating to the treatment of replacement power insurance recoveries.
Emission Allowances	158/Direct Expense	509 411.9	Cost of purchasing and using emission allowances. Also, the losses incurred selling emission allowances.
Off-System Sales		447	Costs and revenues for capacity, energy, ancillary services, make-whole payments, and hedging.

(I) A complete explanation of all the revenues that shall be considered in the determination of the amount eligible for recovery under the proposed RAM and the specific account where each such revenue item is recorded on the electric utility's books and records;

Description	Major	Comments
Off-System Sales	447	Costs and revenues for capacity, energy, ancillary services, make-whole payments, and hedging.
Transmission Revenues	456	Transmission service revenues received including revenues for system control and dispatch, and reactive supply and voltage control, among others.
Coal Sales	151	Fuel costs reduced by revenues from coal sales
Coal and Transportation Fuel Hedges	151	Revenues associated with price swaps and other hedges related to coal contracts and Fuel for Transportation adjustments
Coal and Transportation Fuel Hedges	151	Revenues associated with price swaps and other hedges related to coal contracts and Fuel for Transportation adjustments upon settlement.
Railcar leases	151	Transportation costs reduced by revenue from lease of company owned/leased railcars to other companies
Gas Sales	151/547	Revenues and expenses associated with hedging

		activities and gas portfolio optimization
Ash Sales	501	Sales of fly ash and other types of ash produced at plants
Replacement Power Insurance Recoveries	555	Expected replacement power insurance recoveries qualifying as assets under Generally Accepted Accounting Principles.
Emission Allowances Sales	411.8	Gains realized selling emission allowances.

(J) A complete explanation of any incentive features designed in the proposed RAM and the expected benefit and cost each feature is intended to produce for the electric utility's shareholders and customers;

Ameren Missouri's FAC contains the same FAC-specific incentive feature the Commission included in its existing FAC, and that has also been included in the FACs initially approved for Aquila, Inc. in File No. ER-2007-0004, for The Empire District Electric Company in File No. ER-2008-0093, and that was contained in the continued FAC for Kansas City Power & Light Company – Greater Missouri Operations (formerly Aquila). The FAC is symmetrical. That is, 95% of increases or decreases are passed through the FAC. Given that it is expected that Ameren Missouri's fuel costs will continue to increase for the foreseeable future, by only passing through 95% of the changes in fuel costs, it is highly likely that customers will benefit by not bearing 5% of those increases. If fuel costs were to decrease (because of, for example, higher off-system sales revenues), customers would receive 95% of the decrease. If off-system sales were outside the FAC, customers would not benefit from those higher off-system sales. Customers also benefit because of the additional incentive to mitigate fuel cost increases created by the fact that the Company will simply not recover 5% of the increase in fuel costs.

(K) A complete explanation of any rate volatility mitigation features designed in the proposed RAM;

Ameren Missouri's proposed FAC spreads the recovery of the difference between the base energy costs set in the rate proceeding and fuel costs during each Accumulation Period over a full 8-month period. This has a mitigating effect on rate increases or decreases that will occur as a result of the three periodic FAC adjustments each year. Moreover, as discussed in Item (L) below, Ameren Missouri utilizes a hedging strategy designed to mitigate fuel cost volatility. Moreover, the FAC is seasonally adjusted and contains seasonally differentiated net base fuel costs. This results in tracking higher actual fuel costs against higher base fuel costs (in the Winter) and lower actual fuel costs against lower base fuel costs (in the Summer), both of which tends to mitigate volatility.

(L) A complete explanation of any feature designed into the proposed RAM or any existing electric utility policy, procedure, or practice that can be relied upon to ensure that only prudent costs shall be eligible for recovery under the proposed RAM;

In addition to keeping books and records relating to fuel, transportation and purchased power in accordance with Generally Accepted Accounting Principles and the Uniform System of Accounts, Ameren Missouri employs a number of policies, procedures and practices, including the use of internal audits where appropriate, to ensure the prudence of such costs. Described below are relevant policies, procedures and practices.

Fuel Accounting

In order to ensure proper accounting for coal, gas, and nuclear fuel costs, the following procedures and practices are in place.

Coal. A fuel accounting system called Fuelworx is managed by the coal supply and fuel accounting group. Fuelworx maintains information relating to all contracts, and deliveries scheduled and received against each contract. Fuelworx also records statistical and financial records associated with inventory balances, purchases, and fuel consumption. Fuel accounting enters invoice information into Fuelworx, and matches the invoice amount to contracted amounts for coal, transportation, fuel surcharge, and contracted btu and sulfur adjustments. Any discrepancies are resolved by the fuels contract administration group. Approved invoices are passed electronically to the corporate Accounts Payable system and paid according to contract terms. This system also allocates 8400 and 8800 PRB coal deliveries to each plant on a delivered average cost. This system is critical as it provides all the data related to coal costs for the month-end closing process; and it ensures that all coal commodity, transportation, and quality adjustment costs have been accrued in the proper period. This system is also used to account for oil, limestone and activated carbon costs. All inventory, receivable, and payable accounts associated with coal are balanced on at least a quarterly basis.

Gas. Gas supply executives prepare a month-end estimated gas cost worksheet for Ameren Missouri's generating units. Current month estimates, plus a true-up of prior month actuals versus estimates, are recorded in the current month. All inventory, receivable, and payable accounts associated with gas are balanced on at least a quarterly basis.

Nuclear Fuel. Nuclear fuel expenses and month end balances are calculated in the nuclear fuel accounting system called Surf'n, which is maintained by the nuclear fuel procurement group. All accounts charged in the general ledger are balanced with the nuclear fuel system on at least a quarterly basis.

Fuel Procurement

Fossil (e.g., coal and natural gas): To ensure fuel purchases are prudent, the fuel acquisition for Ameren Missouri's generation is governed by the Ameren Missouri Commodity Risk Management Policy ("Policy"). The rules and guidelines within the Policy, which were approved by Ameren's Risk Management Steering Committee, identify the levels of coal and natural gas for generation that must be acquired and hedged for future periods, identify the various types of allowable commodity transactions, and create extensive management reporting to monitor commodity transactions and price positions. The Policy provides that coal and natural gas be purchased using a risk management strategy that secures the required volume for future periods within maximum and minimum Policy limits while reducing exposure to market volatility. Deviations to the policy are allowed when justified by business conditions but must be approved by the Risk Management Steering Committee. The volumetric risk (securing the necessary quantities of fuel needed for electricity production) and price risk (entering into financial and physical transactions to hedge against price spikes and volatility in the market) for generation fuels are controlled through compliance with the Policy limits. The Policy does not necessarily result in the lowest possible price for fuel, but strikes a balance between price stability and security of supply. In addition to the Policy, there are annual fuel supply planning processes which determine the actual acquisition of fuel for generation needs from various production basins and other parameters of fuel supply including transportation, inventory levels, management of inventory levels through purchases and sales, and logistics with power plants/power traders/generation dispatchers. These processes also encompass the development of competitive or alternative transportation methods between transportation providers to ensure competitive and reliable fuel supply. To ensure competitive fuel supply in the commodity markets, the fuel is procured and hedged through several diverse methods including periodic competitive bids, negotiated purchases, electronic trading, Over-the-Counter ("OTC") transactions, futures market transactions, and spot market transactions. In addition to the Policy and fuel planning processes, the Internal Audit Department conducts routine audits of fuel supply on a three year cycle for purposes of reporting to senior executives and the Board of Directors. Fuel for generation is purchased by Ameren Missouri personnel, which is staffed with full-time fuel professionals to manage all aspects of fuel supply and operations with a mission of delivering reliable and competitive fuel supply for Ameren Missouri.

Nuclear: To ensure nuclear fuel purchases are prudent, Ameren Missouri follows a number of corporate procurement practices (as outlined below), including the Ameren Missouri Commodity Risk Management Policy approved by Ameren's Risk Management Steering Committee and a Nuclear Division administrative procedure for Nuclear Fuel Contracts. These practices and policies provide very similar controls to those described above relating to procurement of fossil fuels. The foregoing practices, policies and procedures are designed to: i) ensure a safe and reliable supply of nuclear fuel to the Callaway Energy Center, ii) reduce Ameren Missouri's exposure to nuclear fuel price volatility, and iii) mitigate risks related to nuclear fuel. The Policy does not necessarily result in the lowest possible price for nuclear fuel but strikes a balance between price stability and security of supply.

The nuclear fuel cycle consists of the mining of uranium to provide U308, the conversion of the U308 into natural uranium hexafluoride (UF6), the enrichment of the UF6, and finally the conversion of the enriched UF6 into uranium dioxide fuel pellets and the fabrication into nuclear fuel assemblies. Nuclear fuel procurement involves contracting in all of the above processes. Ameren Missouri utilizes long-term contracts to ensure nuclear fuel is available for Callaway requirements. In addition, inventories of nuclear fuel are maintained to enhance security of supply. Ameren Missouri also continually monitors market assessments of nuclear fuel supply and demand, price forecasts, and projections of Callaway fuel requirements. This monitoring is an integral part in the continued review of procurement plans. Price and non-price elements, such as reliability of supply, supplier diversity, quality and quantity must also be balanced. In appropriate instances, nuclear fuel procurements are also made through competitive bidding, with all qualified suppliers solicited (however, depending upon the need, in some instances only 2-3 suppliers may be available). The nuclear fuel supply market is worldwide, and other than the uranium supply component itself, there are limited suppliers for the other components of the nuclear fuel cycle. With the excellent operating performance of existing plants, and as the announced plans for new units become reality and the shutdown reactors in Japan begin to restart, supplies of nuclear fuel are expected to tighten in the coming years.

Nuclear fuel for Callaway generation is purchased by Ameren Missouri personnel, staffed with experienced full-time professionals in nuclear fuel procurement to manage all aspects of nuclear fuel supply and operations and with a mission of providing safe, reliable, and cost effective fuel for Callaway.

(M) A complete explanation of the specific customer class rate design used to design the proposed RAM base amount in permanent rates and any subsequent rate adjustments during the term of the proposed RAM;

The FAC applies the FAR to all of Ameren Missouri's Missouri electric retail customers (*see* Schedule No. 6 - Schedule of Rates for Electric Service). To the extent fuel and purchased power costs are included in base rates the rate design discussed in the direct testimony of Ameren Missouri witness William R. Davis is also applied. With regard to the proposed RAM amount in base rates, a level of \$0.01828 per kilowatt-hour at the generation level is included in Rider FAC for the summer and \$0.01779 per kilowatt-hour for the winter, as filed. Adjustments to the rates for each class will be performed in accordance with the formula reflected in Rider FAC and will be reflective of changes in the factors included in the formula versus the values used to determine the RAM amount in base rates. The adjustments reflect a calculation of the FAR based on test year costs and sales consistent with the factors included in the FAR formula in Rider FAC. Actual customer FAR adjustments will be applied to all retail billings for electric service on a per kilowatt-hour basis, as adjusted for losses based on the customers' service voltage (secondary, primary, large transmission service).

(N) A complete explanation of any change in business risk to the electric utility resulting from implementation of the proposed RAM in setting the electric utility's allowed return in any rate proceeding, in addition to any other changes in business risk experienced by the electric utility;

Continuing the RAM will not change Ameren Missouri's business risk. The continuation of a fuel adjustment mechanism (the proposed RAM) would continue to allow Ameren Missouri to pass through to its customers increases and decreases in fuel costs without the need for a costly and time-consuming rate proceeding necessitated by changes in fuel costs. Prior to adoption of FACs for eligible Missouri utilities, the lack of a fuel adjustment mechanism in Missouri had been a major concern to the financial community because fuel costs have been highly volatile. Because fuel adjustment clauses predominantly are part of the regulation of other U.S. utilities, continuing a fuel adjustment mechanism will keep the business risk of Ameren Missouri more comparable to the risks of other utilities. Without a fuel adjustment mechanism, the business risk of Ameren Missouri would be higher than that of other utilities, all else being equal. However, since most of the electric utilities used in the sample groups of comparable companies in Ameren Missouri's cost of equity studies are able to recover their fuel costs through fuel adjustment clauses, the reduced risk of implementing the proposed RAM in Missouri is already reflected in Ameren Missouri's base cost of equity recommendation (10.4%) in this case.

(O) A description of how responses to subsections (B) through (N) differ from responses to subsections (B) through (N) for the currently approved RAM;

Items (B) and (C) are unchanged. Item (D) has been updated to note that emission costs and revenues are part of the design of the FAC (this has always been the case). Item (D) has also been updated to use the correct acronyms for certain terms in the FAC tariff, as implemented in the last rate case. Item (E) has also be updated to make note of the emission costs and revenues, to conform terminology to changes in the FAC tariff from the last rate case, and to generally describe the prevalence of FACs in other states. Item (F) has been updated to provide a more detailed description of the true-up process, although that process has not changed from that being employed before. Item (G) has been slightly updated to be more descriptive, consistent with the FAC's operation since its inception. Item (H) includes minor updates to provide greater description of costs and revenues which have been included in the FAC since its inception, with the exception of transmission revenues, which were not included in the FAC until after the last rate case. Item (I) has also been updated to add transmission revenues and to also make more explicit the inclusion of emission allowances, which were previously included in the FAC. Items (J) and (K) are unchanged. Item (L) has been slightly to identify the correct title of the Company's risk management policy and to provide some additional information on nuclear fuel procurement. Item (M) contains slight updates, including a listing of updated net base energy costs. Item (N) has been slightly updated to reflect the passage of time since the FAC was first adopted in Missouri.

(P) The supply side and demand side resources that the electric utility expects to use to meet its loads in the next four (4) true-up years, the expected dispatch of those resources, the reasons why these resources are appropriate for dispatch and the heat rates and fuel types for each supply-side resource; in submitting this information, it is recognized that supply and demand-side resources and dispatch may change during the next four (4) true-up years based upon changing circumstances and parties will have the opportunity to comment on this information after it is filed by the electric utility;

Attachment C to this Schedule lists the supply- and demand-side resources expected to meet the Ameren Missouri load requirements for the next four years (2014-2017). The data in the table lists the resource name, ownership, primary fuel type, heat rate at full load, and projected generation for the four true-up years. These resources are appropriate for inclusion as they are either (1) owned resources historically utilized to serve Ameren Missouri's requirements, (2) existing purchased power agreements or (3) demand side programs enacted as part of Ameren Missouri's MEEIA program.

(Q) The results of heat rate tests and/or efficiency tests on all the electric utility's nuclear and non-nuclear steam generators, HRSG, steam turbines and combustion turbines conducted with the previous twenty-four (24) months;

Attachment D to this Schedule contains the results of the most recent heat rate tests for the Company's coal-fired units according to the heat rate/efficiency testing processes implemented in connection with the initial approval of the fuel adjustment clause in File No. ER-2008-0318. These include the most recent reports (Performance Reports) of heat rate tests completed on the Company's coal-fired units, data from heat rate testing at the Callaway Plant, and available heat rate test results for the Company's CTG units.

(R) Information that shows that the electric utility has in place a long-term resource planning process, important objectives of which are to minimize overall delivered energy costs and provide reliable service;

On February 23, 2011, Ameren Missouri made its most recently required triennial Integrated Resource Plan ("IRP") filing, reflecting that an important objective of Ameren Missouri's IRP process is to minimize overall delivered energy costs (i.e. least cost planning) and provide reliable service. This filing covers Ameren Missouri's long-term resource planning process and consisted of multiple volumes. Ameren Missouri's IRP filing reflected least cost analyses for a number of resource options and portfolios, and also examined the Company's capacity position and needs in detail. This information included Ameren Missouri's load forecasts as well as its analysis of available supply-side and demand-side resources. The end result is a twenty year resource plan. (Ameren Missouri filed to change the twenty year resource plan on October 25 2011.) Both of these filings were made in compliance with 4 CSR 240-22.010, et. seq. This very comprehensive Commission rule is designed to insure utilities provide energy services

which "...are safe, reliable and efficient, at just and reasonable rates, in a manner that serves the public interest." 4 CSR 240-22.010(2). Ameren Missouri has also filed annual updates with the Missouri Public Service Commission (PSC) in April 2012 and May 2013 and filed a notice with the PSC in February 2013 regarding changes to its preferred resource plan. Ameren Missouri's next triennial IRP filing is due October 1, 2014.

(S) If emissions allowance costs or sales margins are included in the RAM request and not in the electric utility's environmental cost recovery surcharge, a complete explanation of forecasted environmental investments and allowances purchases and sales;

Ameren Missouri established a plan to comply with the new Cross States Air Pollution Rule (CSAPR) that was finalized by USEPA in July 2011. Ameren Missouri's strategy for SO₂ compliance was to continue operation of the wet scrubber system at Sioux Plant coupled with a purchase of ultra-low sulfur coal for the balance of our coal fired units at Labadie, Meramec and Rush Island. No additional capital projects were necessary or planned for SO₂ compliance over the next 5 years. NO_x compliance was to be achieved through some capital investment at Labadie Plant for additional over-fire air capacity and through more aggressive NO_x tuning on all units across the fleet.

CSAPR had two phases, the first going into effect January 1, 2012 and the second, more restrictive phase, starting January 2014. Ameren Missouri planned to bank both SO₂ and NO_x tons during the first phase and use these as necessary to comply with the second phase. As the SO₂ bank was projected to be significantly larger than the NO_x bank, swapping SO₂ allocations for NO_x was considered and a small trade was approved by the PSC late in 2011. The CSAPR was stayed by the United States Court of Appeals for the D.C. Circuit in December 2011. The EPA appealed to the United States Supreme Court and the D.C. Circuit ruling was overturned by the United States Supreme Court on April 29, 2014. The case was returned to the D.C. Circuit for further proceedings. The stay of the CSAPR will remain in effect until these proceeding are completed.

With the continued stay of CSAPR, Ameren Missouri is required to continue to comply with the Clean Air Interstate Rule (CAIR) and thus compliance will essentially be the same as in 2011. Ameren Missouri does not plan to sell CAIR SO₂ allowances as they are of minimum value (<\$1/ton currently) and due to the fact that Ameren Missouri is currently consuming SO₂ tons from our bank. Ameren Missouri's NO_x position under CAIR is long; as such some NO_x sales may be pursued should opportunities be available.

At this time, it is unclear how long CAIR will remain in effect. There is some uncertainty on what, if any, changes will be made to CSAPR through the court process and how this correlates with our previous CSAPR compliance strategy and budgeted capital expenditures.

(T) Any additional information that may have been ordered by the Commission to be provided in the previous general rate proceeding.

The Commission has not ordered any additional information to be provided in connection with a continuation of the FAC.

PRES RDG	PREV RDG	USE	READING	RATE	AMOUNT
47904	46372	1532	Acutal	1M	183.91
Fuel Adjustment Charge					5.06
Energy Efficiency Invest Chg					5.32
Chesterfield Muni Chg					10.23
Amount Due 06/11					\$204.52



PRESORTED
FIRST CLASS MAIL
U.S. POSTAGE PAID
AMEREN

Service at: 123 MAIN
 Service from 4/28 to 5/28/14 Days 30
 Last Payment 5/13/14 \$92.74
 Acct. No. 12345-67890 Bill Date 05/30/2014

RETURN THIS STUB WITH PAYMENT TO
 AMEREN MISSOURI
 P.O. BOX 66529, ST. LOUIS, MO 63166-6529

ADDRESS SERVICE
 REQUESTED
 Acct. No. 12345-67890

JANE DOE
 123 MAIN
 USA, MO 12345

Amount Due	\$204.52
Due By	06/11
Delinquent After	06/20

*Prior to the completion of ER-2014-0258 the Company is expected to transfer from a postcard type bill to a full page type bill. A copy of an exemplar prototype full page bill is attached on pages 3-4 of Attachment A.

1.800.552.7583

AmerenMissouri.com

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the delinquent date.

SPEEDPAY offers residential customers convenient payment options. You can pay your bill using MASTERCARD, VISA or American Express 24/7, just call 1.866.268.3729. For recurring payments visit us at AmerenMissouri.com

Direct Pay Makes Paying Bills Easier. To enroll, go to AmerenMissouri.com, or call 1.800.552.7583 to request an enrollment form.

You're in control of Budget Billing. Your energy payments will be predictable. Avoid surprises, and gain peace of mind. Enroll in Budget Billing by sending only \$139.00. Payment must be received by the due date on this bill.

RETURN THIS STUB TO : AMEREN MISSOURI P.O. Box 66529 ST. LOUIS, MO 63166-6529

SIGN UP FOR PURE POWER
to support clean renewable energy in Missouri and the Midwest. By checking the box, a 1.5 cent per kilowatt hour charge will apply. You may cancel at any time.

Dollar More is a year-round program that helps needy families survive. To give just a dollar more a month with your payment, please mark an 'x' in the box.

Amt Due	\$204.52
Due By	06/11
Delinquent After	06/20

JANE DOE
123 MAIN
ACCT. NO. 12345-67890
AMOUNT
ENCLOSE \$

0010000 0012345678900 00000000 00000000 00204520



- AmerenMissouri.com
- 1.800.552.7583
- PO Box 790352 St. Louis, MO 63179-0352



FOCUSED ENERGY. *For Life.*

Account Messages

In the event of an outage, it's important to have your current phone number associated with your Ameren Missouri account. If you've recently changed your phone number, or switched to mobile only, please update your account online or by calling us at 1.800.522.7583.



Less paper in the mail, more convenience for you. Go paperless with eBill. Sign up today at AmerenMissouri.com. It's easy and efficient.

SPEEDPAY offers residential customer convenient payment options. You can pay your bill using MasterCard, VISA or American Express 24/7, just call 1.866.268.3729. For recurring payments visit us at AmerenMissouri.com.

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the delinquent date.

Energy Efficiency



Ameren Missouri offers our residential customers a variety of energy efficiency programs to choose from in order to save money and better manage your utility bills. Getting started is easy. Just go to ActOnEnergy.com/Missouri and click "For Your Home".

Outage Information



Power out? You must report your outage by either logging on to **AmerenMissouri.com** or by calling **1.800.552.7583**. By informing us of your outage, we'll be able to return the favor by keeping you up-to-date on the progress of your outage.

Options, Options, Options!



Now you can sign up to have convenient bill reminders, payment updates, reported outage updates and more sent to your email or smartphone - keeping you informed the way you prefer. **Go to Ameren.com/Alerts or text REG to 40401.** Message rates may apply.

What is a kWh?



A kilowatt-hour is a unit used to measure the amount of electricity consumed. For example: 4 25-watt CFLs burning for 10 hours = 1kWh.

Dollar more



Ameren Missouri's Dollar more program assists families in need with their home energy costs. When you check the box for Dollar More, one dollar monthly will be added to your bill and 100% of all donations go to families within the Ameren Missouri service area. You can cancel at any time.

Payment Locations



Ameren has several hundred pay in person locations, located primarily in grocery or convenience stores. Most are open 7 days a week, have extended hours, and take partial payments. They are electronically linked to Ameren so that payments can be immediately recorded. To find a bill payment location near you go to AmerenMissouri.com and enter your zip code.

Address Changes or Corrections

Name _____

Address _____

City, State, Zip _____

Phone Number _____



Please Return This Portion With Your Payment

AMOUNT DUE	DUE DATE
\$3,783.31	Jun 27, 2014
AMOUNT PAYABLE AFTER Jul 09, 2014	ACCOUNT NUMBER
\$3,840.06	12345-67899

Amount Enclosed \$ _____

THE ABC COMPANY
PO BOX 100
SAINT LOUIS, MO 63166

Ameren Missouri
P. O. Box 66301
St. Louis, MO 63166-6301



50600000 0012345678909 000003783310 000003783310

Keep This Portion For Your Records

ACCOUNT NUMBER	12345-67899
NAME	THE ABC COMPANY
SERVICE	17 MAIN
AT	CAPE GIRARDEAU, MO 63703

BILL DATE	Jun 17, 2014
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TOTAL AMOUNT DUE BY	Jun 27, 2014	\$3,783.31
DELINQUENT AFTER	Jul 09, 2014	\$3,840.06

Payment received on May 22, 2014 \$2,838.54

TYPE OF READING	METER NUMBER	SERVICE FROM TO	NO. DAYS	METER READING PREVIOUS	METER READING PRESENT	READING DIFFERENCE	METER MULTIPLIER	THERM FACTOR	USAGE	R D
Total kWh	88888888	05/14-06/15	32	28911.0000	29167.0000	256.0000	120.0000		30720.0000	A
Peak kW	88888888	05/14-06/15	32	0.0000	0.7200	0.7200	120.0000		86.4000	A

SUMMARY

Total kWh	Service To 06/15/2014	30720.0000	Peak kW	Service To 06/15/2014	86.4000
Billing Demand	06/15/2014	86.4000	Total Billing Demand	06/15/2014	100.0000

METERED ELECTRIC SERVICE BILLING

Rate 3M Large General Service

Service From 05/14/2014 to 06/15/2014

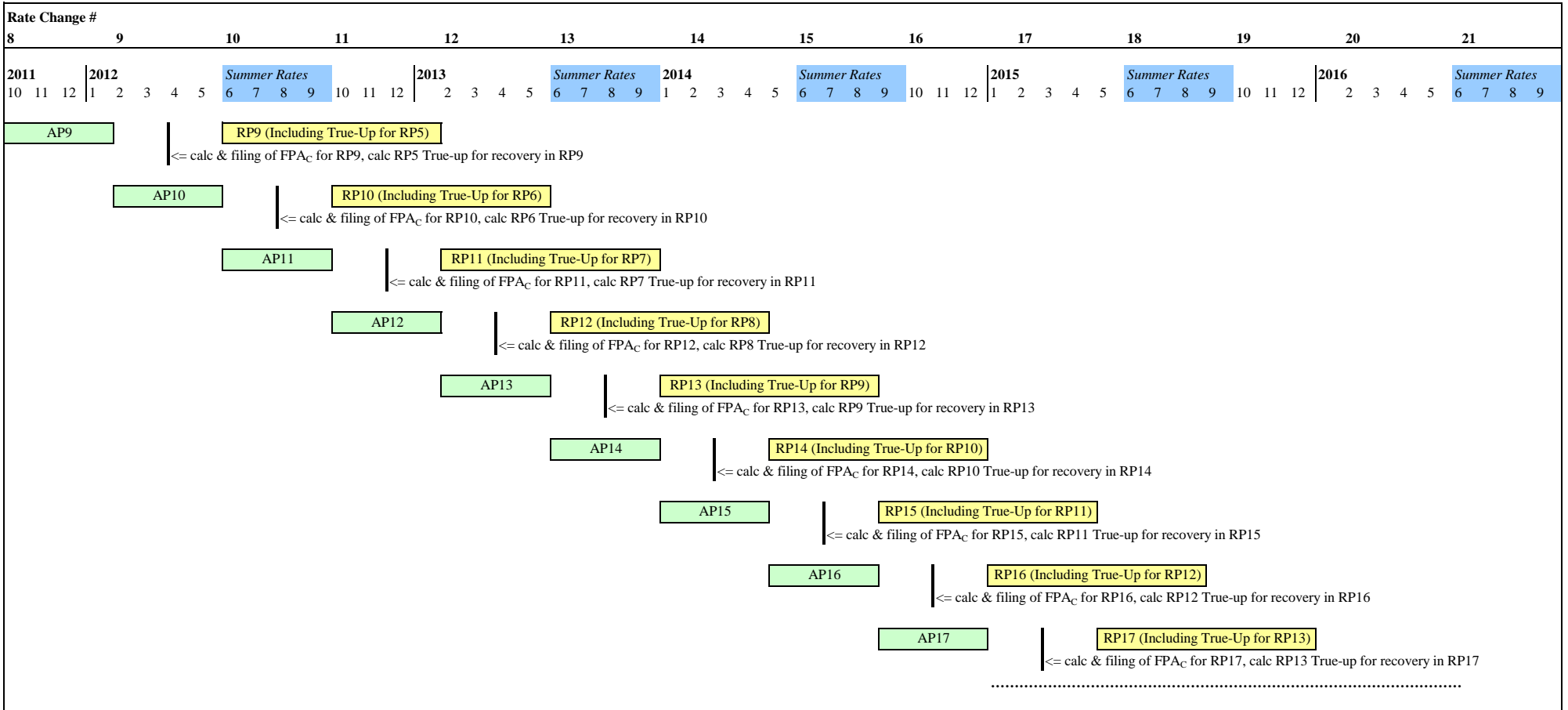
Demand Charge	100.0 kW @	\$4.62000000	\$462.00
Energy Chg / Hours Used	12,960.0 kWh @	\$0.09890000	\$1,281.74
Energy Chg / Hours Used	17,280.0 kWh @	\$0.07440000	\$1,285.63
Energy Chg / Hours Used	480.0 kWh @	\$0.05000000	\$24.00
Fuel Adjustment Charge	30,720.0 kWh @	\$0.00330000	\$101.38
Energy Efficiency Pgm Charge	30,720.0 kWh @	\$0.00080000	\$24.58
Energy Efficiency Investment Chg	30,720.0 kWh @	\$0.00237200	\$72.87
Customer Charge			\$88.82
Total Service Amount			\$3,341.02
Missouri State SalesTax			\$141.16
Missouri Local Sales Tax			\$125.29
Cape Gir-Cape Gir Co Municipal Charge			\$175.84
Total Tax Related Charges			\$442.29

Current Amount Due	\$3,783.31
Prior Amount Due	\$0.00
Total Amount Due	\$3,783.31

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.

Unit	Ownership	Primary Fuel Type	Average Heat Rate	Yr 2014 (Net Mwh)	Yr 2015 (Net Mwh)	Yr 2016 (Net Mwh)	Yr 2017 (Net Mwh)
CALLAWAY	Ameren Missouri	Nuclear	9,945	9,053,600	10,397,500	9,337,200	9,428,700
KEOKUK	Ameren Missouri	Run of River Hydro	N/A	920,100	960,200	1,056,100	1,055,800
LABADIE 1	Ameren Missouri	PRB Coal	10,142	3,175,800	4,134,100	3,832,300	3,888,500
LABADIE 2	Ameren Missouri	PRB Coal	10,088	3,671,600	4,227,000	3,961,000	3,747,000
LABADIE 3	Ameren Missouri	PRB Coal	10,048	4,139,500	3,976,600	3,161,500	3,880,400
LABADIE 4	Ameren Missouri	PRB Coal	10,120	4,268,300	3,461,700	3,872,400	3,903,200
MERAMEC 1	Ameren Missouri	PRB Coal	11,947	399,600	319,500	165,700	164,200
MERAMEC 2	Ameren Missouri	PRB Coal	11,802	397,800	356,900	175,600	162,900
MERAMEC 3	Ameren Missouri	PRB Coal	11,182	1,000,800	749,700	530,100	459,800
MERAMEC 4	Ameren Missouri	PRB Coal	10,791	1,367,000	1,201,100	588,100	708,400
OSAGE	Ameren Missouri	Pond Hydro	N/A	721,900	721,900	721,900	721,900
RUSH 1	Ameren Missouri	PRB Coal	10,043	4,140,900	3,346,100	3,757,800	3,417,300
RUSH 2	Ameren Missouri	PRB Coal	9,717	4,261,200	3,930,300	3,147,400	3,993,000
SIOUX 1	Ameren Missouri	PRB/IL Coal	10,276	2,921,700	2,162,800	2,894,000	2,894,800
SIOUX 2	Ameren Missouri	PRB/IL Coal	10,429	2,202,200	2,880,300	2,859,500	2,423,400
TAUM SAUK	Ameren Missouri	Pumped Storage	N/A	432,200	436,600	465,800	460,600
AUDRAIN CT1	Ameren Missouri	Gas	11,857	2,000	500	1,200	1,200
AUDRAIN CT2	Ameren Missouri	Gas	12,121	2,000	500	2,200	1,100
AUDRAIN CT3	Ameren Missouri	Gas	11,983	2,000	500	2,200	1,100
AUDRAIN CT4	Ameren Missouri	Gas	11,960	1,200	500	2,200	1,100
AUDRAIN CT5	Ameren Missouri	Gas	12,041	1,100	500	2,200	1,100
AUDRAIN CT6	Ameren Missouri	Gas	11,935	1,900	500	1,100	1,100
AUDRAIN CT7	Ameren Missouri	Gas	11,935	1,900	500	1,100	1,100
AUDRAIN CT8	Ameren Missouri	Gas	11,795	1,200	500	1,100	1,100
FAIRGROUNDS CT	Ameren Missouri	Oil	12,240	0	0	0	0
GOOSE CRK CT1	Ameren Missouri	Gas	12,200	500	0	500	1,000
GOOSE CRK CT2	Ameren Missouri	Gas	12,200	500	0	500	1,000
GOOSE CRK CT3	Ameren Missouri	Gas	12,200	500	0	500	1,000
GOOSE CRK CT4	Ameren Missouri	Gas	12,200	500	0	500	1,000
GOOSE CRK CT5	Ameren Missouri	Gas	12,200	500	0	500	1,000
GOOSE CRK CT6	Ameren Missouri	Gas	12,200	500	0	500	1,000
HOWARD BEND CT	Ameren Missouri	Oil	12,672	0	0	0	0
KIRKSVILLE CT	Ameren Missouri	Gas	20,805	0	0	0	0
MERAMEC CT1	Ameren Missouri	Oil	21,012	0	0	0	0
MERAMEC CT2	Ameren Missouri	Gas	15,222	1,300	1,300	1,400	1,400
MEXICO CT	Ameren Missouri	Oil	12,126	0	0	0	0
MOBERLY CT	Ameren Missouri	Oil	12,468	0	0	0	0
MOREAU CT	Ameren Missouri	Oil	12,240	0	0	0	0
PENO CREEK CT1	Ameren Missouri	Gas	10,706	6,000	7,600	8,600	8,800
PENO CREEK CT2	Ameren Missouri	Gas	10,697	6,400	7,200	8,600	8,800
PENO CREEK CT3	Ameren Missouri	Gas	10,723	6,400	6,400	8,300	8,500
PENO CREEK CT4	Ameren Missouri	Gas	10,763	6,100	6,600	8,500	7,500
RACCOON CT1	Ameren Missouri	Gas	11,813	0	0	0	0
RACCOON CT2	Ameren Missouri	Gas	11,813	0	0	0	0
RACCOON CT3	Ameren Missouri	Gas	11,813	0	0	500	1,100
RACCOON CT4	Ameren Missouri	Gas	11,813	0	0	0	0
UEFREDW CT1	Ameren Missouri	Gas	10,784	92,400	99,700	100,000	99,800
UEKINM CT1	Ameren Missouri	Gas	12,000	600	0	800	800
UEKINM CT2	Ameren Missouri	Gas	12,000	600	0	800	800
UEPNK 1	Ameren Missouri	Gas	9,655	11,300	10,600	11,000	12,600
UEPNK 2	Ameren Missouri	Gas	9,648	11,200	10,100	11,300	12,800
UEPNK 3	Ameren Missouri	Gas	9,638	10,600	10,700	11,600	12,400
UEPNK 4	Ameren Missouri	Gas	9,659	10,200	10,000	10,400	12,500
UEPNKY 5	Ameren Missouri	Gas	12,042	0	0	0	0
UEPNKY 6	Ameren Missouri	Gas	12,042	0	0	0	0
UEPNKY 7	Ameren Missouri	Gas	12,042	0	0	0	0
UEPNKY 8	Ameren Missouri	Gas	12,072	0	0	0	0
VEN CT2	Ameren Missouri	Gas	11,045	3,900	3,200	4,000	4,400
VEN CT3	Ameren Missouri	Gas	10,787	14,100	10,300	11,200	19,900
VEN CT4	Ameren Missouri	Gas	10,784	13,200	11,400	19,200	15,500
VEN CT5	Ameren Missouri	Gas	11,866	0	0	0	0
Ofallon Solar En Ctr	Ameren Missouri	Solar	NA	0	7,835	7,798	7,753
Pioneer Prairie	Purchased Power Agreement	Wind	NA	279,900	279,900	280,800	279,900
Cumulative Demand Side Management (Since 2013)				495,842	793,102	978,834	1,078,449

Illustration of Ameren Missouri's FAC with Seasonal NBFC/NBEC and Rate Changes



APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE

(Applicable To Service Provided On ~~January-XXXXXXX 2X~~, 2013-201X And Thereafter)

APPLICABILITY

This rider is applicable to kilowatt-hours (kWh) of energy supplied to customers served by the Company under Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 5(M), 6(M), 7(M), 11(M), and 12(M).

Costs passed through this Fuel and Purchased Power Adjustment Clause (FAC) reflect differences between actual fuel and purchased power costs, including transportation and emissions costs and revenues, net of off-system sales revenues (OSSR) (i.e., Actual Net Energy Costs (ANEC)) and Net Base Energy Costs (B), calculated and recovered as provided for herein.

The Accumulation Periods and Recovery Periods are as set forth in the following table:

<u>Accumulation Period (AP)</u>	<u>Recovery Period (RP)</u>
February through May	October through May
June through September	February through September
October through January	June through January

AP means the four (4) calendar months during which the actual costs and revenues subject to this rider will be accumulated for the purposes of determining the Fuel Adjustment Rate (FAR).

RP means the billing months during which the FAR is applied to retail customer usage on a per kWh basis, as adjusted for service voltage.

The Company will make a FAR filing no later than sixty (60) days prior to the first billing cycle read date of the applicable Recovery Period above. All FAR filings shall be accompanied by detailed workpapers supporting the filing in an electronic format with all formulas intact.

FAR DETERMINATION

Ninety five percent (95%) of the difference between ANEC and B for each respective AP will be utilized to calculate the FAR under this rider pursuant to the following formula with the results stated as a separate line item on the customers' bills.

DATE OF ISSUE July 3, 2014

DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn
NAME OF OFFICER

EXHIBIT A
President & CEO
TITLE

St. Louis, Missouri
ADDRESS

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

For each FAR filing made, the FAR_{RP} is calculated as:

$$FAR_{RP} = [(ANEC - B) \times 95\% + I \pm P \pm T] / S_{RP}$$

Where:

ANEC = FC + PP + E - OSSR

FC = Fuel costs and revenues associated with the Company's generating plants. These consist of the following:

1. For fossil fuel plants:

- A. the following costs and revenues (including applicable taxes) reflected in Federal Energy Regulatory Commission (FERC) Account 501 for: coal commodity, gas, alternative fuels, fuel additives, Btu adjustments assessed by coal suppliers, quality adjustments related to the sulfur content of coal assessed by coal suppliers, railroad transportation, switching and demurrage charges, railcar repair and inspection costs, railcar depreciation, railcar lease costs, similar costs associated with other applicable modes of transportation, fuel hedging costs, fuel oil adjustments included in commodity and transportation costs, oil costs, ash disposal costs and revenues, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and
- B. the following costs and revenues reflected in FERC Account 502 for: consumable costs related to Air Quality Control System (AQCS) operation, such as urea, limestone and powder activated carbon; and

*C. the following costs and revenues reflected in FERC Account 547, excluding fuel costs related to the Company's landfill gas generating plant known as Maryland Heights Energy Center. for: — Such costs and revenues include natural gas generation costs related to commodity, oil, transportation, storage, capacity reservation, fuel losses, hedging, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and

- 2. Costs and revenues in FERC Account 518 (Nuclear Fuel Expense), including nuclear fuel commodity and waste disposal expense, and nuclear fuel hedging costs.

PP = Purchased power costs and revenues and consists of the following:

- 1. Costs and revenues for purchased power reflected in FERC Accounts 555 and 575, excluding all charges under Midwest Independent Transmission System Operator, Inc. ("MISO") Schedules 10, 16, 17 and 24 (or any successor to those MISO Schedules), and excluding generation capacity charges for contracts with terms in excess of one (1) year. Such costs and revenues include:

*Indicates Change.

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~XXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

- A. MISO costs or revenues for MISO's energy and operating reserve market settlement charge types and capacity market settlement clearing costs or revenues associated with:
 - i. Energy;
 - ii. Losses;
 - iii. Congestion management including:
 - a. Congestion;
 - b. Financial Transmission Rights; and
 - c. Auction Revenue Rights;
 - iv. Generation capacity acquired in MISO's capacity auction or market; provided such capacity is acquired for a term of one (1) year or less;
 - v. Revenue sufficiency guarantees;
 - vi. Revenue neutrality uplift;
 - vii. Net inadvertent energy distribution amounts;
 - viii. Ancillary Services, including:
 - a. Regulating reserve service (MISO Schedule 3, or its successor);
 - b. Energy imbalance service (MISO Schedule 4, or its successor);
 - c. Spinning reserve service (MISO Schedule 5, or its successor);and
 - d. Supplemental reserve service (MISO Schedule 6, or its successor); and
 - ix. Demand response, including:
 - a. Demand response allocation uplift; and
 - b. Emergency demand response cost allocation (MISO Schedule 30, or its successor);
- B. Non-MISO costs or revenues as follows:
 - i. If received from a centrally administered market (e.g. PJM/SPP), costs or revenues of an equivalent nature to those identified for the MISO costs or revenues specified in subpart A of part 1 above;
 - ii. If not received from a centrally administered market:
 - a. Costs for purchases of energy; and
 - b. Costs for purchases of generation capacity, provided such capacity is acquired for a term of one (1) year or less; and

DATE OF ISSUE July 3, 2014 DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

EXHIBIT A

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 73.3

CANCELLING MO.P.S.C. SCHEDULE NO. _____ SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

- C. Realized losses and costs (including broker commissions and fees) minus realized gains for financial swap transactions for electrical energy that are entered into for the purpose of mitigating price volatility associated with anticipated purchases of electrical energy for those specific time periods when the Company does not have sufficient economic energy resources to meet its native load obligations, so long as such swaps are for up to a quantity of electrical energy equal to the expected energy shortfall and for a duration up to the expected length of the period during which the shortfall is expected to exist; and
- 2. Insurance premiums in FERC Account 924 for replacement power insurance. Costs of purchased power will be reduced by expected replacement power insurance recoveries qualifying as assets under Generally Accepted Accounting Principles; and
- 3. All transmission service costs reflected in FERC Account 565 and all transmission service revenues reflected in FERC Account 456.1. Such transmission service costs and revenues include:
 - A. MISO costs and revenues associated with:
 - i. network transmission service (MISO Schedule 9 or its successor);
 - ii. point-to-point transmission service (MISO Schedules 7 and 8 or their successors);
 - iii. System control and dispatch, (MISO Schedule 1 or its successor);
 - iv. Reactive supply and voltage control (MISO Schedule 2 or its successor);
 - v. MISO Schedule 11 or its successor;
 - vi. MISO Schedules 26, 26A, 37 and 38 or their successors; and
 - vii. MISO Schedule 33;
 - B. Non-MISO costs associated with:
 - i. network transmission service;
 - ii. point-to-point transmission service;
 - iii. System control and dispatch; and
 - iv. Reactive supply and voltage control.

DATE OF ISSUE July 3, 2014 DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn **EXHIBIT A** President & CEO St. Louis, Missouri
 NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 73.4

CANCELLING MO.P.S.C. SCHEDULE NO. _____ SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

E = Costs and revenues for SO₂ and NO_x emissions allowances in FERC Accounts 411.8, 411.9, and 509, including those associated with hedging.

OSSR = Costs and revenues in FERC Account 447 for:

- 1. Capacity;
- 2. Energy;
- 3. Ancillary services, including:
 - A. Regulating reserve service (MISO Schedule 3, or its successor);
 - B. Energy Imbalance Service (MISO Schedule 4, or its successor);
 - C. Spinning reserve service (MISO Schedule 5, or its successor); and
 - D. Supplemental reserve service (MISO Schedule 6, or its successor);
- 4. Make-whole payments, including:
 - A. Price volatility; and
 - B. Revenue sufficiency guarantee; and
- 5. Hedging.

Adjustment For Reduction of Service Classification 12(M) Billing Determinants:

Should the level of monthly billing determinants under Service Classification 12(M) fall below the level of normalized 12(M) monthly billing determinants as established in Case No. ER-~~2012-0166~~2014-0258, an adjustment to OSSR shall be made in accordance with the following levels:

- a) A reduction of less than 40,000,000 kWh in a given month
 - No adjustment will be made to OSSR.
- b) A reduction of 40,000,000 kWh or greater in a given month
 - An adjustment excluding off-system sales revenue from OSSR will be made equal to the lesser of (1) all off-system sales revenues derived from all kWh of energy sold off-system due to the entire reduction, or (2) off-system sales revenues up to the reduction of 12(M) revenues compared to normalized 12(M) revenues as determined in Case No. ER-~~2012-0166~~2014-0258.

DATE OF ISSUE July 3, 2014 DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

EXHIBIT A

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

For purposes of factors FC, E, and OSSR, "hedging" is defined as realized losses and costs (including broker commissions and fees associated with the hedging activities) minus realized gains associated with mitigating volatility in the Company's cost of fuel, off-system sales and emission allowances, including but not limited to, the Company's use of futures, options and over-the-counter derivatives including, without limitation, futures contracts, puts, calls, caps, floors, collars, and swaps.

Costs and revenues not specifically detailed in Factors FC, PP, E, or OSSR shall not be included in the Company's FAR filings; provided however, in the case of Factors PP or OSSR the market settlement charge types under which MISO or another centrally administered market (e.g., PJM or SPP) bills/credits a cost or revenue need not be detailed in Factors PP or OSSR for the costs or revenues to be considered specifically detailed in Factors PP or OSSR; and provided further, should the MISO or another centrally administered market (e.g. PJM or SPP) implement a market settlement charge type not listed in Exhibit H of the Non-Unanimous Stipulation and Agreement Regarding Class Kilowatt-Hours, Revenues And Billing Determinants, Net Base Energy Costs, and Fuel Adjustment Clause Tariff Sheets approved in Case No. ER-2012-0166 (a "new charge type"):

- A. The Company may include the new charge type cost or revenue in its FAR filings if the Company believes the new charge type cost or revenue possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP or OSSR, as the case may be, subject to another party's right to challenge the inclusion (or failure to include) as outlined in E. below;
- B. The Company will include in its monthly reports required by the Commission's fuel adjustment clause rules notice of the new charge type no later than 60 days prior to the Company including the new charge type cost or revenue in a FAR filing. Such notice shall identify the proposed accounts affected by such change, provide a description of the new charge type demonstrating that it possesses the characteristics of, and is of the nature of, the costs or revenues listed in factors PP or OSSR as the case may be, and identify the preexisting market settlement charge type(s) which the new charge type replaces or supplements;
- C. The Company will also provide notice in its monthly reports required by the Commission's fuel adjustment clause rules that identifies the new charge type costs or revenues by amount, description and location within the monthly reports;
- D. The Company shall account for the new charge type costs or revenues in a manner which allows for the transparent determination of current period and cumulative costs or revenues; and

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

E. If the Company includes a new charge type cost or revenue in a FAR filing and a party challenges the inclusion (or if the Company does not include a new charge type cost or revenue and a party challenges the failure to include it), such challenge will not delay approval of the FAR filing. To challenge the inclusion of a new charge type, a party shall make a filing with the Commission based upon that party's contention that the new charge type costs or revenues at issue should not have been included, because they do not possess the characteristics of the costs or revenues listed in Factors PP or OSSR, as the case may be. To challenge the failure to include a new charge type, a party shall make a filing with the Commission based upon that party's contention that the new charge type costs or revenues at issue should have been included, because they do possess the characteristics of the costs or revenues listed in Factors PP or OSSR, as the case may be. In the event of a challenge, the Company shall bear the burden of proof to support its decision to include or exclude or its failure to include or exclude a new charge type in a FAR filing. Should such challenge be upheld by the Commission, any such costs will refunded (or revenues retained) through a future FAR filing in a manner consistent with that utilized for Factor P.

Should FERC require any item covered by factors FC, PP, E or OSSR to be recorded in an account different than the FERC accounts listed in such factors, such items shall nevertheless be included in factor FC, PP, E or OSSR. In the month that the Company begins to record items in a different account, the Company will file with the Commission the previous account number, the new account number and what costs or revenues that flow through this Rider FAC are to be recorded in the account.

B = BF x S_{AP}

*BF = The Base Factor, which is equal to the normalized value for the sum of allowable fuel costs (consistent with the term FC), plus cost of purchased power (consistent with the term PP), and emissions costs and revenues (consistent with the term E), less revenues from off-system sales (consistent with the term OSSR) divided by corresponding normalized retail kWh as adjusted for applicable losses. The normalized values referred to in the prior sentence shall be those values used to determine the revenue requirement in the Company's most recent rate case. The BF applicable to June through September calendar months (BF_{SUMMER}) is \$~~0.014960~~ 0.01828 per kWh. The BF applicable to October through May calendar months (BF_{WINTER}) is \$~~0.014540~~ 0.01779 per kWh.

*Indicates Change.

DATE OF ISSUE July 3, 2014 DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn **EXHIBIT A** President & CEO St. Louis, Missouri
 NAME OF OFFICER TITLE ADDRESS

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~ XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

S_{AP} = kWh during the AP that ended immediately prior to the FAR filing, as measured by taking the retail component of the Company's load settled at its MISO CP node (AMMO.UE or successor node), plus the kWh reductions up to the kWh of energy sold off-system associated with the 12(M) OSSR adjustment above plus the metered net energy output of any generating station operating within its certificated service territory as a behind the meter resource in MISO, the output of which served to reduce the Company's load settled at its MISO CP node (AMMO.UE or successor node).

S_{RP} = Applicable RP estimated kWh representing the expected retail component of the Company's load settled at its MISO CP node (AMMO.UE or successor node) plus the metered net energy output of any generating station operating within its certificated service territory as a behind the meter resource in MISO, the output of which served to reduce the Company's load settled at its MISO CP node (AMMO.UE or successor node).

I = Interest applicable to (i) the difference between ANEC and B for all kWh of energy supplied during an AP until those costs have been recovered; (ii) refunds due to prudence reviews ("P"), if any; and (iii) all under- or over-recovery balances created through operation of this FAC, as determined in the true-up filings ("T") provided for herein. Interest shall be calculated monthly at a rate equal to the weighted average interest rate paid on the Company's short-term debt, applied to the month-end balance of items (i) through (iii) in the preceding sentence.

P = Prudence disallowance amount, if any, as defined below.

T = True-up amount as defined below.

The FAR, which will be multiplied by the Voltage Adjustment Factors (VAF) set forth below is calculated as:

$$FAR = FAR_{RP} + FAR_{(RP-1)}$$

where:

FAR = Fuel Adjustment Rate applied to retail customer usage on a per kWh basis starting with the applicable Recovery Period following the FAR filing.

FAR_{RP} = FAR Recovery Period rate component calculated to recover under- or over-collection during the Accumulation Period that ended immediately prior to the applicable filing.

$FAR_{(RP-1)}$ = FAR Recovery Period rate component for the under- or over-collection during the Accumulation Period immediately preceding the Accumulation Period that ended immediately prior to the application filing for FAR_{RP} .

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 73.8

CANCELLING MO.P.S.C. SCHEDULE NO. _____ SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Service Provided On ~~January 2, 2013~~XXXXXXX X, 201X And Thereafter)

FAR DETERMINATION (Cont'd.)

To determine the FAR applicable to the individual Service Classifications, the FAR determined in accordance with the foregoing will be multiplied by the following Voltage Adjustment Factors (VAF):

Secondary Voltage Service (VAF _{SEC})	1.0575
Primary Voltage Service (VAF _{PRI})	1.0252
Large Transmission Voltage Service (VAF _{TRAN})	0.9917

The FAR applicable to the individual Service Classifications shall be rounded to the nearest \$0.00001 to be charged on a \$/kWh basis for each applicable kWh billed.

TRUE-UP

After completion of each RP, the Company shall make a true-up filing on the same day as its FAR filing. Any true-up adjustments shall be reflected in T above. Interest on the true-up adjustment will be included in I above.

The true-up adjustments shall be the difference between the revenues billed and the revenues authorized for collection during the RP.

GENERAL RATE CASE/PRUDENCE REVIEWS

The following shall apply to this FAC, in accordance with Section 386.266.4, RSMo. and applicable Missouri Public Service Commission Rules governing rate adjustment mechanisms established under Section 386.266, RSMo:

The Company shall file a general rate case with the effective date of new rates to be no later than four years after the effective date of a Commission order implementing or continuing this FAC. The four-year period referenced above shall not include any periods in which the Company is prohibited from collecting any charges under this FAC, or any period for which charges hereunder must be fully refunded. In the event a court determines that this FAC is unlawful and all moneys collected hereunder are fully refunded, the Company shall be relieved of the obligation under this FAC to file such a rate case.

Prudence reviews of the costs subject to this FAC shall occur no less frequently than every eighteen months, and any such costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this rider shall be returned to customers. Adjustments by Commission order, if any, pursuant to any prudence review shall be included in the FAR calculation in P above unless a separate refund is ordered by the Commission. Interest on the prudence adjustment will be included in I above.

DATE OF ISSUE July 3, 2014 DATE EFFECTIVE August 2, 2014

ISSUED BY Michael Moehn President & CEO St. Louis, Missouri
NAME OF OFFICER EXHIBIT A TITLE ADDRESS

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (Cont'd.)

(Applicable To Calculation of Fuel Adjustment Rate for the Billing Months of ~~June-XXXX 2014-201X~~ through ~~September-XXXXXXXX 2014201X~~)

*Calculation of Current Fuel Adjustment Rate (FAR):

Accumulation Period Ending:

1. Actual Net Energy Cost (ANEC) (FC+PP+E-OSSR)		\$
2. Net Base Energy Cost (B)	-	\$
2.1 Base Factor (BF)	x	\$
2.2 Accumulation Period Sales (S _{AP})		kWh
3. Total Company Fuel and Purchased Power Difference	=	\$
3.1 Customer Responsibility	x	95%
4. Fuel and Purchased Power Amount to be Recovered	=	\$
4.1 Interest (I)	+	\$
4.2 True-Up Amount (T)	-	\$
4.3 Prudence Adjustment Amount (P)	±	
5. Fuel and Purchased Power Adjustment (FPA)	=	\$
6. Estimated Recovery Period Sales (S _{RP})	÷	kWh
7. Current Period Fuel Adjustment Rate (FAR _{RP})	=	\$/kWh
8. Prior Period Fuel Adjustment Rate (FAR _{RP-1})	+	\$/kWh
9. Fuel Adjustment Rate (FAR)	=	\$/kWh
10. Secondary Voltage Adjustment Factor (VAF _{SEC})		1.0575
11. FAR for Secondary Customers (FAR _{SEC})		\$/kWh
12. Primary Voltage Adjustment Factor (VAF _{PRI})		1.0252
13. FAR for Primary Customers (FAR _{PRI})		\$/kWh
14. Transmission Voltage Adjustment Factor (VAF _{TRAN})		0.9917
15. FAR for Transmission Customers (FAR _{TRAN})		\$/kWh

* Indicates Change.

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ISSUED BY Michael Moehn
NAME OF OFFICER

EXHIBIT A
President & CEO
TITLE

St. Louis, Missouri
ADDRESS