

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

In the Matter of the Second True-Up)	
Filing Under the Commission-)	
Approved Fuel Adjustment Clause of)	Case No. ER-2011-_____
Union Electric Company d/b/a Ameren Missouri.)	

**APPLICATION OF AMEREN MISSOURI CONTAINING ITS
SECOND FUEL ADJUSTMENT CLAUSE TRUE-UP**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), by and through counsel and, pursuant to 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5), hereby submits its Application respecting the true-up of amounts to be collected or refunded under its fuel adjustment clause (“FAC”) arising from the second Recovery Period.¹ In support of its Application, Ameren Missouri states as follows:

1. Union Electric Company is a Missouri corporation doing business under the fictitious names of AmerenUE and Ameren Missouri, in good standing in all respects, with its principal place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. Ameren Missouri is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. There is already on file a certified copy of Ameren Missouri’s Certificate of Corporate Good Standing (*see* Case No. EF-2009-0266), and Ameren Missouri’s Fictitious Name Registrations as filed with the Missouri Secretary of State’s Office (*see* Docket Nos. EN-2011-0069 and GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes. To the best of Ameren Missouri’s knowledge, it has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or

¹ Capitalized terms in this Application, unless otherwise defined, have the meaning given them in the Company’s FAC tariff, Rider FAC.

rates, which action, judgment or decision has occurred within three (3) years of the date of this Application, except the August 24, 2010 judgment of the Pemiscot County Circuit Court and Stoddard County Circuit Court (in consolidated writ of review proceedings) in Case Nos. 09PE-CV00070-01 and 10PE-CC00418, which judgment involves the review proceedings involving Ameren Missouri's 2008 electric rate case (Commission Case No. ER-2008-0318), and which judgment has been suspended pending appeal to the Missouri Court of Appeals for the Southern District of Missouri (Case No. SD30865). In addition, Ameren Missouri has no annual report or assessment fees that are overdue.

2. Communications with regard to this Application should be directed to:

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3. In its Report and Order issued January 27, 2009, in Case No. ER-2008-0318, the Commission approved the Company's use of a FAC. On December 23, 2009, in Case No. ER-2010-0165, the Commission approved the Company's second Fuel and Purchased Power

(“FPA”) rate adjustment arising from the Accumulation Period prescribed by the Company’s FAC tariff for the period June 1, 2009 through September 30, 2009. The difference between Actual Net Fuel Costs and Net Base Fuel Costs for the subject Accumulation Period was to be recovered from or refunded to customers during the Recovery Period at issue in this case, which ran from February 1, 2010 through January 31, 2011.

4. As explained in the Direct Testimony of Jeff L. Dodd being submitted herewith, during Ameren Missouri’s second Recovery Period, at issue here, Ameren Missouri over-collected (ignoring interest)) approximately \$176,052. As Mr. Dodd testifies, the over--collection occurred because the FPA rate is calculated based upon estimated kilowatt-hour (“kWh”) sales for the Recovery Period, and the FPA rate will never exactly match the FPA rate that is appropriate once actual sales are recorded. Consequently, a difference exists between the estimate and the actual kWh billed that must be trued-up. However, a mistake in calculating Net Base Fuel Costs (the mistake that is the subject of Case No. ER-2010-0274) resulted in the charges to customers during Recovery Period 2 (ignoring interest) being too small by \$1,619,423. Netting the over-collection of \$176,052 against the under-collection of \$1,619,423 means that customers were under-charged by \$1,443,371 during Recovery Period 2. After accounting for interest due customers on the \$176,052 of over-recovery and due the Company on the \$1,619,423 under-recovery (the net interest is \$653,569), an additional \$ 2,097,030 should ultimately be collected from customers.

5. The mistake mentioned above is described in detail in the Stipulation of Facts on file in Case No. ER-2010-0274, which is incorporated herein by this reference. Because the Commission has not yet ruled on Ameren Missouri’s request that the impact of this mistake be corrected through additional collections through the FPA rate applied to customer bills, and will

not do so prior to the time when the true-up adjustment from this case is to take effect, the Company requests that it be allowed, through the change in its first FPA rate filing after the Commission's Report and Order in Case No. ER-2010-0274 becomes effective, to collect from customers the \$1,443,371 under-recovery, plus interest thereon of \$653,659, for a total adjustment of \$2,097,030.

6. In support of its Application and pursuant to 4 CSR 240-3.161(8)(A), Ameren Missouri is filing the following information as part of the direct testimony of Jeff L. Dodd: "1. Amount of costs that it has over-collected or under-collected through the RAM by rate class and voltage level; 2. Proposed adjustments or refunds by rate class and voltage level; [and] 3. Electric utility's short-term borrowing rate." Moreover, in further support of its Application and pursuant to 4 CSR 240-3.161(B), Ameren Missouri is submitting the following information to the Commission and serving it upon the parties: "1. Workpapers detailing how the determination of the over-collection or under-collection of costs through the RAM was made including any model inputs and outputs and the derivation of any model inputs; 2. Workpapers detailing the proposed adjustments or refunds; [and] 3. Basis for the electric utility's short-term borrowing rate." Moreover, the Company is including additional information detailing how the determination of the over-collection or under-collection of costs through the RAM was made, ignoring the net base fuel costs calculation error as described in the Stipulation of Facts on file in Case No. ER-2010-0274.

WHEREFORE, Ameren Missouri hereby requests that the Commission make and enter its order approving the collection of the \$2,097,030 under-collection arising from its second Recovery Period via inclusion in the first FPA rate filing after the Commission's Report and Order in Case No. ER-2010-0274 becomes effective.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via e-mail on all counsel of record to the case in which the fuel adjustment clause in effect for the true-up filing made herein was approved, on this 1st day of April, 2011.

/s/James B. Lowery