

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri Containing Its Annual¹) **File No. ER-2015-0234**
Fuel Adjustment Clause Mechanism.)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 15TH RECOVERY PERIOD**

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its recommendation respectfully states:

1. On March 27, 2015, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a true-up to its Fuel Adjustment Clause (“FAC”) to identify the amount of over- or under-recovery during the previous 8-month FAC recovery period, as required by the provisions of its FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. The true-up amount and interest amount for the 15th Recovery Period identified in this case are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in the Company’s 18th Accumulation Period Fuel Adjustment Rates (“FAR”) filing in File No. ER-2015-0233, also filed on March 27.

3. On March 30, 2015, the Commission ordered Staff to file a recommendation regarding its examination and analysis of the true-up filing by no later than April 27, 2015, as required by Commission Rule 4 CSR 240-20.090(5)(D).

¹ These filings by Ameren Missouri are not actually annual; rather, Ameren Missouri makes a true-up filing every four months to cover an eight month recovery period. Staff respectfully suggests that the caption of this case (and future Ameren Missouri FAC true-up cases) should be changed to *In the Matter of Union Electric Company d/b/a Ameren Missouri’s Fuel Adjustment Clause True-Up Filing*.

4. Rule 4 CSR 240-20.090(5)(D) also requires the Commission to issue an order deciding the true-up within 60 days of Ameren Missouri's filing or suspending the timeline of the true-up to receive additional evidence and hold a hearing, or, if no order is issued, the rule provides that the tariff schedules and rate adjustments shall take effect by operation of law 60 days after filing.

5. As explained in Staff's *Memorandum*, attached hereto and incorporated herein by reference, Staff recommends that the Commission approve Ameren Missouri's true-up filing for the 15th Recovery Period.

6. Staff reviewed and analyzed the direct testimony and supporting schedules of Ameren Missouri witness Erik C. Wenberg. Staff found that Ameren Missouri's calculations for the true-up amount and interest amount for the 15th Recovery Period (the billing months June 2014 through January 2015) are correct. The 15th Recovery Period's under-collected amount of \$630,030 and interest amount of \$282,122 (for a total under-recovery of \$912,152) are included in Ameren Missouri's calculation of its requested current period FARs in File No. ER-2015-0233, also filed March 27, 2015.

7. Staff has verified that Ameren Missouri has filed its 2014 annual report and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except File No. ER-2015-0233 noted above.

WHEREFORE, Staff submits its analysis of the Company's true-up filing and recommends that the Commission approve Ameren Missouri's true-up filing for the 15th Recovery Period, under the provisions of the Company's FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel for all parties of record this 27th day of April, 2015.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2015-0234
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Matthew J. Barnes, Utility Regulatory Auditor IV

DATE: /s/ John A. Rogers 04/27/2015 /s/ Jeffrey A. Keevil 04/27/2015
Energy Resource Analysis Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company d/b/a Ameren Missouri's Fifteenth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: April 27, 2015

On March 27, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") in the form of direct testimony and supporting schedules by Erik C. Wenberg, its fifteenth true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets, 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount without interest of \$630,030 identified in this filing is the result of an under-collection during Recovery Period 15 ("RP15") that includes the billing months of June 2014 through January 2015. RP15 is the recovery period for and following Accumulation Period 15 ("AP15") that includes the period of October 1, 2013 through January 31, 2014. Starting on page 3, line 21 and ending on page 4, line 4 of his direct testimony, Company Witness Erik C. Wenberg states the following:

There was an under-recovery of \$630,030 from customers during the Recovery Period due to the difference between actual and estimated KWh sales described earlier and recalculations using the S105 data. After applying the interest to be recovered for the Accumulation Period of \$282,122, which was calculated using the Company's short-term borrowing rate as provided for in the FAC tariff and the Commission's FAC rules, there was a total under-recovery from customers of \$912,152.

The true-up amount¹ without interest for RP15 of \$630,030 and the interest amount for RP15 of \$282,122 are included in the calculation of the Fuel and Purchased Power

¹ See Page 1 of 5 of Schedule EW-TU of the direct testimony of Erik C. Wenberg for calculation of the RP15 true-up adjustment amounts with interest and without interest.

Adjustment (“FPA”) amount for the Company’s Accumulation Period 18 (“AP18”) adjustment filing, also filed on March 27, 2015, in File No. ER-2015-0233, in compliance with Ameren Missouri’s FAC.²

Staff examined the direct testimony of Erik C. Wenberg, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly information Ameren Missouri has submitted to the Commission. Staff also reviewed Ameren Missouri’s monthly interest calculations; Staff agrees with them.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri’s RP15 true-up filing for the billing months June 2014 through January 2015 during which Ameren Missouri under-collected \$630,030 from its customers for inclusion in the calculation of the FPA amount included in the Company’s AP18 adjustment filing in File No. ER-2015-0233.

Staff has verified that Ameren Missouri has filed its 2014 annual report³ and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring reports as required in 4 CSR 240-20.090(10) and its monthly reports as required by 4 CSR 240-3.161(5). Staff is not aware of any other matter before the Commission that affects or is affected by this filing, except as noted herein.

² Union Electric Company’s Schedule No. 6, Original Sheet No. 72.8: “TRUE-UP: After completion of each RP, the Company shall make a true-up filing on the same day as its FAR [Fuel Adjustment Rate] 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.”

³ Ameren Missouri filed its 2014 Annual Report on April 15, 2015.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
Containing Its Annual Fuel Adjustment)
Clause Mechanism)

File No. ER-2015-0234

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Matthew J. Barnes, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Matthew J. Barnes

Subscribed and sworn to before me this 27th day of April, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086



Notary Public

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In the Matter of the Application of Union)
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Containing Its Annual Fuel Adjustment)
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File No. ER-2015-0234

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David C. Roos, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



David C. Roos

Subscribed and sworn to before me this 27th day of April, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
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Notary Public