

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

In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel) **Case No. ER-2017-0025**
Adjustment Clause for the 19th Recovery)
Period)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 19TH RECOVERY PERIOD**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed an application for its 19th Fuel Adjustment Clause True-Up filing, July 25, 2016, with an effective date of September 23, 2016. Ameren Missouri's application would result in an adjustment to the amount collected through its fuel adjustment clause ("FAC") due to over-collection. Recovery Period 19 ("RP19") includes the billing months of October 2015 through May 2016 and followed Accumulation Period 19 that includes the period of February 1, 2015, through May 31, 2015. The Commission ordered Staff to conduct a review and file its Recommendation no later than August 24, 2016.

2. Commission Rule 4 CSR 240-20.090(5)(D) sets forth that following receipt of Staff's Recommendation, the Commission should either approve, reject or suspend the filing within 60 days or the tariff and FAC rate adjustments will take effect. Rule 4 CSR 240-3.161(8) sets forth the filing requirements for an electric utility filing a true-up related to a rate adjustment mechanism such as an FAC and 4 CSR 240-20.090(5) sets forth the requirements for submission of true-ups to remedy either over or under-collection through rate adjustments or refunds.

3. Staff reviewed and analyzed the direct testimony and supporting schedules of Ameren Missouri witness Erik C. Wenberg. As a result of its analyses, Staff recommends that the Commission approve Ameren Missouri's true-up filing for the billing months of October 2015 through May 2016 during which the Company over-collected \$536,023 from its customers¹, the true-up amount for RP19, and accrued interest of \$460,412² for RP19, resulting in a total over-recovery from customers of \$75,611 during RP19.

4. *Staff's Memorandum*, including its recommendation, is attached to this pleading as Appendix A and contains a more detailed explanation of Staff's analyses of the Company's submitted testimony, work papers, monthly reports, and interest calculations.

5. Staff has also verified that Ameren Missouri has timely filed its 2015 annual report, is current on its Surveillance Monitoring reports, and is not delinquent on any assessment.

WHEREFORE, Staff recommends that the Commission approve Ameren Missouri's Recovery Period 19 True-Up Filing; and grant such other and further relief as the Commission considers just in the circumstances.

¹ Over-recovery of \$536,023 was due to the difference between actual and estimated kWh sales.

² The amount of \$460,412 is accrued interest on the total amount to be recovered in RP19.

Respectfully Submitted,

/s/ Robert S. Berlin

Robert S. Berlin

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Missouri Bar No. 51709

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 24th day of August, 2016 to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0025
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III

/s/ John Rogers 08/24/2016 /s/ Bob Berlin 08/24/2016
Energy Resources Department / Date Staff Counsel's Office / Date

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

DATE: August 24, 2016

Recommendation

On July 25, 2016, 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 nineteenth 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 (\$536,023) as identified in this filing is the result of an over-collection during Recovery Period 19 ("RP19") that includes the billing months of October 2015 through May 2016. RP19 is the recovery period for and following Accumulation Period 19 ("AP19") that includes the period of February 1, 2015 through May 31, 2015. On page 4 lines 1-8 of his direct testimony, Company Witness Erik C. Wenberg states the following:

"There was an over-recovery of \$536,023 from customers for the 19th Recovery Period due to the difference between actual and estimated kWh sales and recalculations using the S105 data. After applying the interest to be recovered for the subject Accumulation Period of \$460,412, 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 over-recovery from customers for the 19th Recovery Period of \$75,611. Schedule EW7 TU to this testimony (and Attachment A to that schedule) contains details of the calculations that produce the amount to be recovered from customers."

The true-up amount¹ without interest for RP19 of (\$536,023) and the interest amount for RP19 of \$460,412 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 22 (“AP22”) adjustment filing, also filed on July 25, 2016, in File No. ER-2017-0024, 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 reports 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 RP19 true-up filing for the billing months October 2015 through May 2016 during which Ameren Missouri (1) over-collected \$536,023 from its customers, the true-up amount for RP19, and (2) accrued interest of \$460,412 during RP19.

Staff has verified that Ameren Missouri has filed its 2015 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.

¹ See Schedule EW-TU attached to the direct testimony of Erik C. Wenberg for calculation of the RP19 true-up adjustment amounts with interest and without interest.

² Union Electric Company’s Schedule No. 6, Original Sheet No. 73.9 and 73.10: “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 2015 Annual Report on April 15, 2016.

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In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel Adjustment)
Clause for the 19th Recovery Period)

File No. ER-2017-0025

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Memorandum; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.



David C. Roos

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August, 2016.



NOTARY PUBLIC

JESSICA LUEBBERT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: February 19, 2019
Commission Number: 15633434