

**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)
Adjustment Clause for the 22nd Recovery) **Case No. ER-2018-0031**
Period)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 22nd 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 22nd Fuel Adjustment Clause True-Up filing on July 27, 2017. Ameren Missouri's application would result in an adjustment to the amount collected through its fuel adjustment clause ("FAC") due to an under-recovery. Recovery Period 22 ("RP22") includes the billing months of October 2016 through May 2017 and followed Accumulation Period 22 that included the period of February 1, 2016, through May 31, 2016. The Commission ordered Staff to conduct a review and file its recommendation no later than August 28, 2017.

2. Commission Rule 4 CSR 240-20.090(5)(D) provides 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 Marci L. Althoff. As a result of its analyses, Staff recommends that the Commission approve Ameren Missouri's true-up filing for the billing months of October 2016 through May 2017 during which the Company under-recovered \$289,541 from its customers, the true-up amount without interest for RP22, and accrued interest of \$537,445¹ for RP22, resulting in a total under-recovery from customers of \$826,986 during RP22.

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 verified that Ameren Missouri has timely filed its 2016 annual report, is not delinquent on any assessment, and is current on its Surveillance Monitoring reports.

WHEREFORE, Staff recommends that the Commission approve Ameren Missouri's Recovery Period 22 True-Up Filing, and grant such other and further relief as the Commission considers just in the circumstances.

¹ Accrued interest of \$537,445 during RP22 includes AP22 interest of \$77,033, and interest for True-Up Period 19 of \$460,412. See page 1 of Schedule MA-TU attached to the direct testimony of Marci L. Althoff. Note: an amount in parentheses is a credit to the customer and an amount not in parentheses is due the Company.

Respectfully Submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Deputy Staff Counsel

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 28th day of August, 2017, to all parties of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2018-0031
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Ron Irving, Utility Regulatory Auditor I

DATE: /s/ John Rogers August 28, 2017 /s/ Bob Berlin August 28, 2017
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 Twenty-Second 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 28, 2017

On July 27, 2017, 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 Marci L. Althoff, its twenty-second 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 \$289,541 as identified in this filing is the result of an under-collection during Recovery Period 22 ("RP22") that includes the billing months of October 2016 through May 2017. RP22 is the recovery period for and following Accumulation Period 22 ("AP22") that includes the period of February 1, 2016 through May 31, 2016. On page 4 lines 1-8 of her direct testimony, Company Witness Marci L. Althoff states the following:

"There was an under-recovery of \$289,541 from customers for the 22nd Recovery Period due to the difference between actual and estimated kWh sales and recalculations described earlier using the S105 data. After applying the interest to be recovered for the subject Accumulation Period of \$537,445, 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 for the 22nd Recovery Period of \$826,986. Schedule MA-TU to this testimony (and Attachment A to that schedule) contains details of the calculations that produce the amount to be refunded to customers."

The true-up amount¹ without interest for RP22 of \$289,541 and the interest amount for RP22 of \$537,445 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 25 (“AP25”) adjustment filing, also filed on July 27, 2017, in File No. ER-2018-0030, in compliance with Ameren Missouri’s FAC.²

Staff examined the direct testimony of Marci L. Althoff, 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 RP22 true-up filing for the billing months October 2016 through May 2017 during which Ameren Missouri (1) under-collected \$289,541 from its customers, the true-up amount for RP22, and (2) accrued interest of \$537,445.³

Staff has verified that Ameren Missouri has filed its 2016 annual report⁴ and is not delinquent on any assessment. Ameren Missouri is current on the 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 MA-TU attached to the direct testimony of Marci L. Althoff for calculation of the RP22 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 Accrued interest of \$537,445 during RP22 includes AP22 interest of \$77,033 and interest for True-Up Period 19 of \$460,412. See page 1 of Schedule MA-TU attached to the direct testimony of Marci L. Althoff. Note: an amount in parenthesis is a credit to the customer.

⁴ Ameren Missouri filed its 2016 Annual Report on April 14, 2017.

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OF THE STATE OF MISSOURI**

In the Matter of the True-Up of Union Electric Company)
d/b/a Ameren Missouri's Fuel Adjustment Clause for the)
22nd Recovery Period)

File No. ER-2018-0031

AFFIDAVIT OF RON IRVING

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW, Ron Irving and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

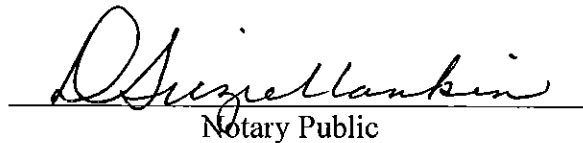
Further the Affiant sayeth not.



Ron Irving

Subscribed and sworn to be this 18th day of August, 2017.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070



Notary Public