

**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 21st Recovery)
Period)

Case No. ER-2017-0244

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI’S FUEL ADJUSTMENT CLAUSE FOR THE 21st 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 21st Fuel Adjustment Clause True-Up filing on March 23, 2017. Ameren Missouri’s application would result in an adjustment to the amount collected through its fuel adjustment clause (“FAC”) due to an over-recovery. Recovery Period 21 (“RP21”) includes the billing months of June 2016 through January 2017 and followed Accumulation Period 21 that included the period of October 1, 2015, through January 31, 2016. The Commission ordered Staff to conduct a review and file its recommendation no later than April 24, 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 June 2016 through January 2017 during which the Company over-recovered \$562,405 from its customers,¹ the true-up amount for RP21, and accrued interest of 489,986² for RP21, resulting in a total over-recovery from customers of \$72,419 during RP21.

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 21 True-Up Filing, and grant such other and further relief as the Commission considers just in the circumstances.

¹ Over-recovery of \$562,405 was due to the difference between actual and estimated kWh sales.

² Accrued interest of \$489,986 during RP21 includes AP21 interest of (\$14,461), and interest for True-Up Period 18 of \$503,030, and interest for True-Up of N Factor Adjustment Period 20 of \$1,417. 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.

Respectfully Submitted,

/s/ Mark Johnson

Mark Johnson
Senior Counsel
Missouri Bar No. 64940
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7431 (Telephone)
(573) 751-9285 (Fax)
mark.johnson@psc.mo.gov

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 April, 2017, to all parties of record.

/s/ Mark Johnson

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0244
Union Electric Company d/b/a Ameren Missouri

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

DATE: /s/ John Rogers 04/24/2017 /s/ Bob Berlin 04/24/2017
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-First 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 24, 2017

On March 23, 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-first 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 (\$562,405) as identified in this filing is the result of an over-recovery during Recovery Period 21 ("RP21") that includes the billing months of June 2016 through January 2017. RP21 is the recovery period for and following Accumulation Period 21 ("AP21") that includes the period of October 1, 2015, through January 31, 2016. On page 4 lines 1-8 of her direct testimony, Company Witness Marci L. Althoff states the following:

"There was an over-recovery of \$562,405 from customers for the 21st 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 \$489,986, 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 21st Recovery Period of \$72,419.

Schedule MA-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 RP21 of (\$562,405) and the interest amount for RP21 of \$489,986 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 24 (“AP24”) adjustment filing, also filed on March 23, 2017, in File No. ER-2017-0243, in compliance with Ameren Missouri’s FAC.²

Staff reviewed the direct testimony of Marci L. Althoff, the supporting schedules and work papers Ameren Missouri provided with its application in this case. During its review of the Company’s work papers, Staff discussed with Ameren Missouri Witness Marci L. Althoff all of the components of the true-up amount for AP21 and the true-up interest amount for AP21 contained in the supporting schedules and work papers including the true-up amount for the N-factor adjustment for AP20 and true-up interest amount for the N-factor adjustment for AP20 included on Page 1 of 6 of Schedule MA-TU. The N-factor adjustment for AP20 was deferred to AP21 as a result of the January 20, 2016, Commission *Order Regarding Fuel Adjustment Clause Tariff*. Further discussion of the N-factor is provided in the Staff Recommendation Memorandum in File No. ER-2017-0243 section: Adjustment for Reduction of Service Classification 12(M) or 13(M) Billing Determinants. Staff also reviewed the monthly reports Ameren Missouri has submitted to the Commission and Ameren Missouri’s monthly interest calculations; Staff agrees with them.

¹ See Schedule MA-TU attached to the direct testimony of Marci L. Althoff for calculation of the RP21 true-up adjustment amounts with interest and without interest.

² Union Electric Company, 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.”

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri's RP21 true-up filing for the billing months June 2016 through January 2017 during which Ameren Missouri (1) over-collected \$562,405 from its customers, resulting in the true-up amount for RP21 of (\$562,405), and (2) accrued interest of \$489,986 during RP21.³

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.

³ Accrued interest of \$489,986 during RP21 includes AP21 interest of (\$14,461), interest for True-Up Period 18 of \$503,030, and interest for True-Up of N Factor Adjustment Period 20 of \$1,417. 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.

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

In the Matter of the True-Up of Union Electric)
Company d/b/a to Ameren Missouri's Fuel)
Adjustment Clause for the 21st Recovery)
Period)

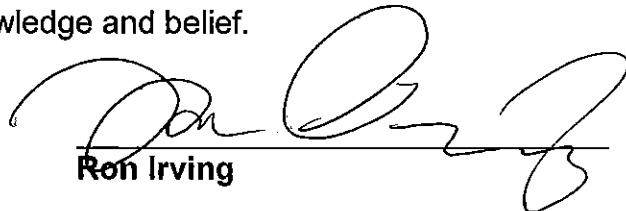
Case No. ER-2017-0244

AFFIDAVIT

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 Memorandum; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



Ron Irving

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 20th day of April, 2017.



NOTARY PUBLIC

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