

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

In the Matter of the Adjustment of Union)
Electric Company d/b/a Ameren Missouri's) **Case No. ER-2017-0243**
Fuel Adjustment Clause for the Twenty-Fourth)
Accumulation Period)

**STAFF REVISED RECOMMENDATION TO APPROVE TARIFF SHEET REGARDING
CHANGE TO THE FUEL ADJUSTMENT RATE FOR ACCUMULATION PERIOD 24**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Revised Recommendation* to approve certain tariff sheet, states as follows:

1. On April 24, 2017, Staff filed its *Recommendation to Approve Tariff Sheet Regarding Change to the Fuel Adjustment Rate for Accumulation Period 24*. On April 26, 2017, at the request of Staff, Ameren Missouri filed a substitute 6th Revised Sheet No. 73.11 to remove provisions that were formerly necessary to address the \$0.00200/kWh cap that had been applicable to the former Industrial Aluminum Smelter (“IAS”) customer class. The IAS class, also known as 13(M) service classification, was no longer offered by Ameren Missouri, effective April 1, 2017, when new base rate schedules became effective as a result of Case No. ER-2016-0179. Despite this change to Ameren Missouri’s 6th Revised Sheet No. 73.11, its proposed Fuel Adjustment Rates (“FARs”) for Recovery Period 24 (“RP24”) have not changed, and Staff renews its recommendation that the Commission issue an order approving Ameren Missouri’s 6th Revised Tariff Sheet No. 73.11. For the convenience of the Commission, Staff has revised its *Memorandum*, attached hereto as *Appendix A*, and restates its recommendation as follows:

2. On March 23, 2017, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a proposed tariff sheet, 6th Revised Sheet No. 73.11, with supporting direct testimony pursuant to Commission Rules 4 CSR 240-20.090(4) and 4 CSR 240-3.161(7), seeking approval to adjust the Company’s FARs used to calculate its Fuel Adjustment Clause (“FAC”) charge billed to its customers.¹ The proposed tariff sheet, as substituted on April 6, 2017, and on April 26, 2017, bears a May 24, 2017 effective date.

3. Concurrently, on March 23, 2017, Ameren Missouri submitted a true-up filing in File No. ER-2017-0244 to identify the amount of over- or under-recovery during Recovery Period 21 (“RP21”) prescribed by its FAC. The over- or under-recovered amount (or true-up amount) and interest amount for RP21 are used when calculating the new FARs in this case.

4. On March 24, 2017, the Commission ordered Staff to examine and analyze Ameren Missouri’s filings in this case, and to file its recommendation no later than April 24, 2017, as required by Rule 4 CSR 240-20.090(4). The Commission also directed that all parties to Case No. ER-2014-0258 (the general rate proceeding in which continuation of Ameren Missouri’s FAC was most recently approved) be added to the service list for this case, and set an intervention date of April 3, 2017.

5. Staff’s Revised Memorandum, attached hereto as *Appendix A* and incorporated herein by reference, recommends the Commission issue an order approving the proposed revised tariff sheet Ameren Missouri filed on March 23, 2017, and substituted on April 26, 2017.

¹ Ameren Missouri submitted a *Substitute Tariff* on April 26, 2017, that represents the final approved version.

6. Commission Rule 4 CSR 240-20.090(4) states in pertinent part: (A) “An electric utility with a FAC shall file one (1) mandatory adjustment to its FAC in each true-up year coinciding with the true-up of its FAC....”² The rule requires Staff “to determine if the proposed adjustment to the FAC is in accordance with the provisions of this rule, Section 386.266 RSMo and the FAC mechanism established in the most recent general rate proceeding.” If so, “the commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility’s filing or... the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed.”

7. Ameren Missouri’s filing in this case requests Commission approval of one tariff sheet bearing an effective date of May 24, 2017, that revises the current FARs in its FAC. The filing includes testimony and work papers of Ameren Missouri witness Marci L. Althoff supporting the Company’s calculation of the Fuel and Purchased Power Adjustment (“FPA”).

8. The FPA amount³ of \$1,232,466⁴ is the sum of: Fuel and purchased power amount to be recovered from customers for Accumulation Period 24 (“AP 24”) equal to \$1,300,217⁵ (Line 4 on 6th Revised Sheet No. 73.11); plus Interest \$494,654, which includes \$4,668 for AP24 and \$489,986 for Recovery Period 21 (“RP 21”);

² An electric utility may also file up to three (3) additional adjustments to its FAC within a true-up year with the timing and number of such filings to be determined in a general rate proceeding.

³ 6th Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of \$1,232,466.

⁴ An amount not bracketed in parentheses represents an amount owed to the utility.

⁵ Fuel and purchased power amount to be recovered from customers for AP24 is equal to ninety-five percent (95 %) of \$1,368,649 (the difference between ANEC and Net Base Energy Cost (“B”) during AP24)..

plus the True-Up amount, without interest, equal to (\$562,405). This True-Up amount is before the Commission for approval in pending File No. ER-2017-0244.

9. As explained in Staff’s Revised Memorandum, the FPA amount results in a Current Period Fuel Adjustment Rate (“FAR₂₄”) of \$0.00005 per kWh (Line 7 on 6th Revised Sheet No. 73.11) which, when added to the Prior Period FAR (FAR₂₃) of \$0.00060 per kWh (Line 8 on 6th Revised Sheet No. 73.11), results in a proposed FAR of \$0.00065 per kWh (Line 9 on 6th Revised Sheet No. 73.11), which is an decrease of \$0.00052 per kWh when compared to the existing FAR of \$0.00117 per kWh.⁶ Because of a difference in line losses, the FAR is adjusted for the voltage at which customers receive service.

10. Because the Initial Rate Component for Large Transmission voltage service of \$0.00065 / kWh is less than \$0.00200 / kWh,⁷ the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the RP24 FARs for each service voltage level, and the Industrial Aluminum Smelter (“IAS”) Service rate class FAR is equal to that of the Large Transmission voltage level rate class.

Listed below are the proposed RP24 FARs and the difference between them for Secondary, Primary, and Large Transmission and IAS service:

Service	Proposed RP24 FAR	Current RP23 FAR	Difference
Secondary	\$0.00069/kWh	\$0.00124/kWh	\$0.00055/kWh Decrease
Primary	\$0.00067/kWh	\$0.00120/kWh	\$0.00053/kWh Decrease
Transmission	\$0.00065/kWh	\$0.00116/kWh	\$0.00051/kWh Decrease

⁶ 5th Revised Sheet No. 73.11 line 9.

⁷ The Commission’s *Report and Order* in Case No. ER-2015-0258 created a new Industrial Aluminum Smelter Rate Class for which the FAR IAS rate is capped at \$0.00200 per kWh.

Based on a monthly usage of 1,015 kWh, the proposed change to the Secondary FAR would decrease the Fuel Adjustment Charge of an Ameren Missouri residential customer's bill by \$0.56, from \$1.26 to \$0.70 per month.

11. According to Ameren Missouri witness Marci L. Althoff, "Ameren Missouri's ANEC during the October 1, 2016 to January 31, 2017 Accumulation Period increased by \$1,368,649 as compared to the Factor "B" applicable to that same period. The primary factors driving this increase above the base (Factor "B") were the Adjustment for Reduction of Service Classification 12(M) or 13(M) Billing Determinants provided for in Rider FAC (referred to as the "N Factor" and calculation in accordance with the Commission's *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130) and lower off-system sales margins, partially offset by higher net capacity revenues."⁸

12. Staff has determined that Ameren Missouri timely filed the 6th Revised Tariff Sheet No. 73.11 as substituted on April 6, 2017, and substituted again on April 26, 2017, and that it complies with Commission Rule 4 CSR 240-3.161 and Ameren Missouri's FAC as defined in its FAC tariff sheets.

13. Staff has verified that Ameren Missouri is not delinquent on any assessment, and has filed its 2016 annual report. Ameren Missouri is current on the filing of its Surveillance Monitoring reports as required by 4 CSR 240-20.090(10) and its monthly reports 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-2017-0244 as noted herein.

⁸ Direct testimony of Marci L. Althoff, page 3, line 19 through page 4, line 4.

WHEREFORE, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet filed on March 23, 2017, and substituted on April 6, 2017, and again on April 26, 2017, to become effective on May 24, 2017, as requested by Ameren Missouri:

MO.P.S.C. Schedule No. 6

6th Revised Sheet No. 73.11 Cancelling 5th Revised Sheet No. 73.11.

Respectfully Submitted,

/s/ Mark Johnson

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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 April, 2017, to all parties of record.

/s/ Mark Johnson

REVISED MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0243, Tariff Tracking No. YE-2017-0181
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Ron Irving, Utility Regulatory Auditor I
Curtis Gateley, Utility Policy Analyst II

/s/ John Rogers 4/28/2017

Energy Resources Department / Date

/s/ Bob Berlin 4/28/2017

Staff Counsel's Office / Date

SUBJECT: Staff Recommendation for Approval of Tariff Sheet Filed to Change Rates
Related to Ameren Missouri's Fuel Adjustment Clause Pursuant to the
Commission's Report and Order in File Nos. ER-2014-0258 and ER-2016-0130.

DATE: April 28, 2017

Summary and Recommendation

On March 23, 2017, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one (1) tariff sheet, 6th Revised Sheet No. 73.11, bearing a proposed effective date of May 25, 2017, cancelling 5th Revised Sheet No. 73.11. The Commission assigned the tariff sheet to Tariff Tracking No. YE-2017-0181. Ameren Missouri's March 23, 2017 filing includes the testimony of Ameren Missouri witness Marci L. Althoff and associated Ameren Missouri work papers. On April 6, 2017, Ameren Missouri filed a substitute 6th Revised Sheet No. 73.11 to correct the effective date of the tariff sheet to May 24, 2017, the first day of the Company's June 2017 billing month. On April 26, 2017, at the request of Staff, Ameren Missouri filed a substitute 6th Revised Sheet No. 73.11 to remove provisions that were formerly necessary to address the \$0.00200/kWh cap that had been applicable to the former Industrial Aluminum Smelter ("IAS") customer class. The IAS class, also known as 13(M) service classification, was no longer offered by Ameren Missouri, effective April 1, 2017, when new base rate schedules became effective as a result of Case No. ER-2016-0179. The filed tariff sheet, 6th Revised Sheet No. 73.11, filed on March 23, 2017 as substituted on April 6, 2017, and on April 26, 2017,

revises Ameren Missouri's Fuel Adjustment Rates¹ ("FARs") of its Fuel Adjustment Clause ("FAC") for the four-month Accumulation Period 24 ("AP24") which ended on January 31, 2017. Staff recommends the Missouri Public Service Commission ("Commission") approve the 6th Revised Sheet No. 73.11, as substituted on April 26, 2017.

Adjustment for Reduction of Service Classification 12 (M) or 13 (M) Billing Determinants²

Ameren Missouri's Original Sheet No. 73.4 authorizes the Company to make an adjustment to the off-system sales revenue ("OSSR") component in the Actual Net Energy Cost ("ANEC")³ calculation and an adjustment to the accumulation period sales to calculate Net Base Energy Cost ("B")⁴. Ameren Missouri's Original Sheet No. 73.4 states:

Should the level of monthly billing determinants under Service Classifications 12 (M) or 13 (M) fall below the level of normalized 12 (M) or 13 (M) monthly billing determinants as established in Case No. ER-2014-0258, an adjustment to OSSR shall be made in accordance with the following levels:

- a) A reduction of less than 40,000,000 kWh in a given month
 - No adjustment will be made to OSSR.
- b) A reduction of 40,000,000 kWh or greater in a given month
 - An adjustment excluding off-system sales revenue from OSSR will be made equal to the lesser of (1) all off-system sales revenues derived from all kWh of energy sold off-system due to the entire reduction, or (2) off-system sales revenues up to the reduction of 12 (M) or 13 (M) revenues compared to normalized 12 (M) or 13 (M) revenues as determined in Case No. ER-2014-0258.

¹ The proposed FARs for secondary, primary, and transmission voltage level service on lines 11, 13 and 15, respectively, of the initially filed proposed 6th Revised Sheet No. 73.11 (filed on March 23, 2017) are unaffected by the substitute 6th Revised Sheet No. 73.11 filed on April 6, 2017 and on April 26, 2017.

² Service Classification 12(M) is the Large Transmission Service Rate and Service Classification 13(M) is the Industrial Aluminum Smelter (IAS) Service Rate. The Commission's *Report and Order* in Case No. ER-2015-0258 created the Industrial Aluminum Smelter (IAS) Rate Class, for which the FAR IAS rate is capped at \$0.00200 per kWh. The Commission's *Report and Order* in Case No. ER-2016-0179 eliminated the IAS rate.

³ ANEC = fuel costs (FC) plus purchased power costs (PP) plus net emission allowances costs (E) minus off-system sales revenues (OSSR) as reflected on line 1 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017.

⁴ B = Base Factor times the accumulation period sales as reflected on lines 2, 2.1 and 2.2 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017.

In File No. ER-2016-0130 for AP20, the monthly billing determinants under Service Classification 13 (M) fell below – for the first time - the level of normalized 12 (M) or 13 (M) monthly billing determinants established in Case No. ER-2014-0258 by an amount greater than 40,000,000 kWh. However, no adjustments to S_{AP} ⁵ and to OSSR were made in File No. ER-2016-0130 because of a disagreement among Ameren, the Office of Public Counsel (“OPC”) and Missouri Industrial Energy Consumers (“MIEC”) concerning the methodology to determine the amount of the adjustments to S_{AP} and to OSSR for AP20.⁶

On March 7, 2016, Ameren, Staff, OPC and MIEC filed a Second Non-Unanimous Stipulation and Agreement to: 1) establish a methodology to determine the adjustments to S_{AP} and to OSSR for adjustment periods beginning with AP21, and 2) establish that the methodology results in an AP20 N-Factor⁷ adjustment of \$437,526 to be retained by Ameren.

Staff reviewed the work papers of Company witness Marci L. Althoff’s Schedule MA-FAR and finds the adjustments to S_{AP} , OSSR and to Net Base Energy Costs (NBEC) for AP24 to be correct and in accordance with the methodology approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in File No. ER-2016-0130. For AP24 the Commission-approved methodology results in the following monthly and AP24 amounts:

Period	Adjustment to S_{AP} (kWh)	Adjustment to OSSR	N-Factor
October 2016	328,892,336	\$8,355,627	\$2,669,079
November 2016	301,616,296	\$7,186,176	\$1,971,230
December 2016	195,971,465	\$5,376,128	\$1,987,781
January 2017	313,857,046	\$8,161,023	\$2,734,435
AP24	1,140,337,143	\$29,078,954	\$9,362,525

⁵ Original Sheet No. 73.7 defines S_{AP} as kWh during the AP that ended immediately prior to the FAR filing, as measured by taking the most recent kWh data for the retail component of the Company’s load settled at its MISO CP node (AMMO.UE or successor node), plus the kWh reductions up to the kWh of energy sold off-system associated with the 12(M) or 13(M) OSSR adjustment above plus the metered net energy output of any generating station operating within its certificated service territory as a behind the meter resource in MISO, the output of which served to reduce the Company’s load settled at its MISO CP node (AMMO.UE or successor node).

⁶ File No. ER-2016-0130 Non-unanimous Stipulation and Agreement filed on January 12, 2016 and approved by the Commission on January 20, 2016.

⁷ N-Factor adjustment is the decrease in the off-system sales revenue amount as a result of any adjustments to S_{AP} and OSSR derived from the methodology approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in File No. ER-2016-0130.

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri's work papers for AP24 contain data and calculations for Actual Net Energy Cost ("ANEC") equal to \$210,620,197^{8,9} (line 1 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017) and Net Base Energy Cost ("B") equal to \$209,251,548¹⁰ (line 2 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017). For this filing, B is equal to sales of 12,102,460,901 kWh for October 2016 through January 2017 times \$0.01729¹¹ per kWh. The difference between ANEC and B is equal to \$1,368,649 and is the amount on line 3 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017, Total Company Fuel and Purchased Power Difference.

In her filed testimony, Company witness Marci L. Althoff states:

The primary factors driving this increase above the base (Factor "B") were the Adjustment for Reduction of Service Classification 12 (M) or 13(M) Billing Determinants provided for in Rider FAC (referred to as the "N Factor" and calculated in accordance with the Commission's Order Approving Second Stipulation and Agreement in Case No. ER -2016-013) and lower off-system sales margins partially offset by lower fuel costs and higher net capacity revenues.¹²

Calculation of FPA Amount

Ameren Missouri's testimony, work papers and 6th Revised Sheet No. 73.11, as substituted April 26, 2017, supports Ameren Missouri's calculation of the dollar amount of its Fuel and Purchased Power Adjustment ("FPA"). That dollar amount ("FPA Amount")¹³

⁸ Actual Net Energy Cost (ANEC) of \$210,620,197 includes \$29,078,954 due to the adjustment to OSSR for AP24.

⁹This ANEC includes accounting corrections for revenues originally placed in wrong accounts. Ameren had originally recorded revenues from the City of Perry and the City of Linneus in a wrong account. Ameren corrected the accounting, which includes accounting corrections for the period from August 2011 to August 2016, resulting in a credit against purchased power costs in Account 555 (sub-account MIS) of \$59,081.72 and an increase of revenues in Account 447 (also sub-account MIS) of \$25,683.86. These corrections were made to the General Ledger in August 2016, which lowered Actual Net Energy Costs in that month by the sum of those two figures.

From September 2016 forward, Ameren continues to receive revenues from the City of Perry which, are now recorded to Account 555, in a new sub-account for Perry (PRY), as an offset to purchased power costs. Under a new contract, the City of Linneus pays an "all-in" power price designed to cover all such costs, such as energy, ancillary services, RNU, etc. All the revenues under this new City of Linneus contract are now recorded to Account 447.

¹⁰ Net Base Energy Cost (B) of \$209,251,548 which includes \$19,716,429 of net base energy cost due to an increase of the S_{AP} equal to 1,140,337,143 kWh.

¹¹ Winter Base Factor (BF_{Winter}) rate on Original Sheet No. 73.7 of \$0.01729 per kWh was used to calculate B (line 2 of 6th Revised Sheet No. 73.11). BF_{Winter} is applicable for the October 2016 through January 2017 calendar months.

¹² Company witness Marci L. Althoff's direct testimony page 3, line 21 through page 4, line 4.

¹³ 6th Revised Sheet No. 73.11, as substituted April 26, 2017, lines 1 through 5 include the complete calculation of the FPA Amount of \$1,232,466.

is \$1,232,466 which is the sum of:

1. Fuel and purchased power amount to be recovered from customers for AP24 equal to \$1,300,217¹⁴ (Line 4 on 6th Revised Sheet No. 73.11, as substituted April 26, 2017); plus
2. Interest of \$494,654 which includes: \$4,668 for AP24, \$489,986 for Recovery Period 21 (“RP21”); plus
3. The true-up amount, without interest, equal to (\$562,405) which is pending Commission approval in File No. ER-2017-0244.

Calculation of FAR24

FAR₂₄ of \$0.00005 per kWh is equal to the FPA Amount of \$1,232,466 divided by the Estimated Recovery Period Sales in kWh settled at MISO CP node (AMMO.UE or successor node) of 23,465,388,463 kWh. FAR₂₄ will apply during Recovery Period 24 (“RP24”) - Ameren Missouri’s billing months of June 2017 through January 2018.

Calculation of FAR Without Voltage Level Adjustments

Line 9 of Ameren Missouri’s proposed 6th Revised Sheet No. 73.11, as substituted April 26, 2017, reflects a FAR of \$0.00065 per kWh which is the sum of: 1) FAR₂₄ of \$0.00005 per kWh, and 2) FAR₂₃ of \$0.00060 per kWh.

Voltage Level FARs

Because of a difference in line losses,¹⁵ there are be different Rate Components for service taken at the Secondary, Primary, and Transmission voltage levels on lines 11, 13 and 15 of 6th Revised Sheet No. 73.11, as substituted April 26, 2017. The RP24 FARs are in the table below:

¹⁴ Fuel and purchased power amount to be recovered from customers for AP24 is equal to ninety-five percent (95 %) of \$1,368,649 (the difference between ANEC and B during AP24).

¹⁵ Secondary, Primary, and Transmission Voltage Adjustment Factors are shown on lines 10, 12, and 14, respectively, on Ameren Missouri’s proposed 6th Revised Sheet No. 73.11, as substituted April 26, 2017.

Service	RP24 FAR	Line on 6 th Revised Sheet No. 73.11
Secondary	\$0.00069/kWh	11
Primary	\$0.00067/kWh	13
Transmission	\$0.00065/kWh	15

Listed below are the proposed RP24 FARs, the current RP23 FARs and the difference between them for Secondary, Primary, and Transmission service:

Service	Proposed RP24 FAR	Current RP23 FAR	Difference
Secondary	\$0.00069/kWh	\$0.00124/kWh	\$0.00055/kWh Decrease
Primary	\$0.00067/kWh	\$0.00120/kWh	\$0.00053/kWh Decrease
Transmission	\$0.00065/kWh	\$0.00116/kWh	\$0.00051/kWh Decrease

Based on a monthly usage of 1,015 kWh, the proposed change to the Secondary FAR would decrease the Fuel Adjustment Charge of an Ameren Missouri residential customer's monthly bill by \$0.56, from \$1.26 to \$0.70 per month.

Staff reviewed the proposed 6th Revised Sheet No. 73.11, as substituted April 26, 2017, the direct testimony of Ameren Missouri witness Marci L. Althoff and the work papers in this filing, as well as Ameren Missouri's monthly information submitted in compliance with 4 CSR 240-3.161(5) for AP24. Staff verified that the actual fuel and purchased power costs and emissions costs net of off-system sales revenues reflected therein match the fuel and purchased power costs and emission costs net of off-system sales revenues on line 1 of Ameren Missouri's proposed 6th Revised Sheet No. 73.11, as substituted April 26, 2017, and the supporting schedules of witness Marci L. Althoff. Staff reviewed Ameren Missouri's monthly reports and verified that the kWh billed as shown on the monthly reports match the accumulation period sales used to calculate B. Staff reviewed Ameren Missouri's monthly interest rates that are applied to 95% of the over/under Net Base Energy Cost amount and verified that the monthly interest rates and calculations of monthly interest amounts are correct for AP24.

Staff Review

Staff reviewed Ameren's proposed substitute 6th Revised Sheet No. 73.11, as substituted April 26, 2017, bearing a proposed effective date of May 24, 2017, and cancelling 5th Revised Sheet No. 73.11, the direct testimony of Ameren witness Marci L. Althoff filed on March 23, 2017, in addition to Ameren's monthly filings and work papers for AP24. Staff verified that the actual fuel and purchased power costs plus net emissions allowance costs less off-system sales revenues, match the fuel and purchased power costs plus net emissions allowance costs less off-system sales revenues in Ameren's proposed 6th Revised Sheet No. 73.11, as substituted April 26, 2017, cancelling 5th Revised Sheet No. 73.11. Staff also reviewed Ameren's monthly interest rates that are applied to the monthly over- and under-recovery amounts for AP24, a portion of RP23, and a portion of RP21 and the calculation of the monthly interest amounts. The information filed with the tariff sheet and work papers, by Ameren, include sufficient data to calculate the FARs for AP24.

Attachment A includes three charts which provide a summary of Ameren's twenty-four FAC rate adjustment filings. Chart 1 illustrates Ameren's FAR for each of the twenty-four accumulation periods. Chart 2 illustrates Ameren's FAC cost summary for Actual Net Energy Cost and Net Base Energy Cost. Chart 3 illustrates Ameren's 12-month Rolling Fuel and Purchased Power Costs.

Staff Recommendation

Ameren Missouri timely filed 6th Revised Sheet No. 73.11, as substituted April 26, 2017, and based on Staff's review, Staff has determined that Ameren Missouri is in compliance with Commission Rule 4 CSR 240-3.161 (Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms Filing and Submission Requirements), and Ameren Missouri's FAC embodied in its tariff.

Commission Rule 4 CSR 240-20.090(4) provides in part:

[T]he commission shall either issue an interim rate adjustment order approving the tariff schedules and the FAC rate adjustments within sixty (60) days of the electric utility's filing or, if no such order is issued, the tariff schedules and the FAC rate adjustments shall take effect sixty (60) days after the tariff schedules were filed.

Ameren Missouri requested that proposed 6th Revised Sheet No. 73.11, filed March 23, 2017, and substituted on April 6, 2017 and on April 26, 2017, become effective on May 24, 2017, the beginning of the first billing cycle of Ameren Missouri's June 2017 billing month. Thus, the proposed tariff sheet was filed with 61 days' notice. Therefore, Staff recommends the Commission issue an order approving the following proposed substitute tariff sheet, filed on April 26, 2017, to become effective on May 24, 2017, as requested by Ameren Missouri:

MO.P.S.C. Schedule No. 6

6th Revised Sheet No. 73.11 Cancelling 5th Revised Sheet No. 73.11.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2016 Annual Report.¹⁶ 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 File No. ER-2017-0244 as noted herein.

¹⁶ Ameren Missouri filed its 2015 Annual Report on April 14, 2017.