

**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)	<u>Case No. ER-2018-0030</u>
Fuel Adjustment Clause for the 25 th)	Tariff Tracking No.YE-2018-0011
Accumulation Period)	

**STAFF RECOMMENDATION TO APPROVE TARIFF SHEET REGARDING
CHANGE TO THE FUEL ADJUSTMENT RATES FOR ACCUMULATION PERIOD 25**

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

1. On July 27, 2017, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed a proposed tariff sheet, 1st Revised Sheet No. 74.13, as substituted August 8, 2017, bearing a proposed effective date of September 25, 2017, and cancelling Original Sheet No. 74.13. The Company's tariff sheet filing with supporting direct testimony pursuant to Commission Rules 4 CSR 240-20.090(4) and 4 CSR 240-3.161(7), seeks approval to adjust the Company's Fuel Adjustment Rates ("FARs") used to calculate its Fuel Adjustment Clause ("FAC") charge billed to its customers for Accumulation Period 25 ("AP25").

2. Concurrently, on July 27, 2017, Ameren Missouri submitted a true-up filing in File No. ER-2018-0031 to identify the amount of over- or under-recovery during Recovery Period 22 ("RP22") prescribed by its FAC. The over- or under-recovered amount (or true-up amount) and interest amount for RP22 are used when calculating the new FARs in this case.

3. On August 31, 2017, the Commission ordered Staff to examine and analyze Ameren Missouri's filings in this case, and to file its recommendation no later

than August 28, 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 August 11, 2017.

4. Staff's Memorandum, attached hereto as *Appendix A* and incorporated herein, recommends the Commission issue an order approving the proposed revised tariff sheet Ameren Missouri filed on July 27, 2017, and substituted on August 8th.

5. 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..."¹ 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."

6. Ameren Missouri's filing in this case requests Commission approval of one tariff sheet as substituted bearing an effective date of September 25, 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").

¹ 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.

7. The FPA amount² of \$(6,258,396)³ is the sum of: Fuel and purchased power amount to be recovered from customers for AP 25 equal to \$(7,074,873)⁴ (Line 4 on 1st Revised Sheet No. 74.13); plus Interest of \$526,936 which includes \$(10,509) for AP25 and \$537,445 for Recovery Period 22 (“RP 22”); plus the True-Up amount, without interest, equal to \$289,541 which is the True-Up amount pending Commission approval in File No. ER-2018-0031.

8. As explained in Staff’s Memorandum, the FPA amount results in a Current Period Fuel Adjustment Rate (“FAR25”) of \$(0.00029) per kWh which, when added to the Prior Period FAR (FAR24) of \$0.00005 per kWh, results in a proposed FAR of \$(0.00024) per kWh. The proposed FAR of \$(0.00024) per kWh is \$0.00089 per kWh less than the current FAR of \$0.00065 per kWh⁵.

9. Because of a difference in line losses, there may be different Initial Rate Components for service taken at the Secondary, Primary and Transmission voltage levels reflected on lines 11, 13, and 15 of the 1st Revised Sheet No. 74.13, as substituted August 8th. Listed below are the proposed RP25 FARs, the current RP24 FARs and the difference between them for Secondary, Primary, and Transmission service:

² 1st Revised Sheet No. 74.13 as substituted August 8, 2017, lines 1 through 5 include the complete calculation of the FPA Amount of \$(6,258,396).

³ An amount that is bracketed in parentheses represents an amount owed to customers.

⁴ Fuel and purchased power amount to be recovered from customers for AP25 is equal to ninety-five percent (95 %) of \$(7,447,235) (the difference between ANEC and Net Base Energy Cost (“B”) during AP25).

⁵ Line 9 of 6th Revised Sheet No. 73.11

Service	Proposed RP25 FAR	Current RP24 FAR	Difference
Secondary	\$(0.00026) / kWh	\$0.00069 / kWh	\$0.00095 / kWh Decrease
Primary	\$(0.00025) / kWh	\$0.00067 / kWh	\$0.00092 / kWh Decrease
Transmission	\$(0.00024) / kWh	\$0.00065 / kWh	\$0.00089 / 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 bill by \$0.96, from \$0.70 to \$(0.26) per month.

10. According to Ameren Missouri witness Marci L. Althoff, "The primary factors driving this decrease below the base (Factor "B") were lower fuel costs and higher net capacity revenues partially offset by lower off-system sales margins and 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-2016-0130)."⁶

11. Staff has determined that Ameren Missouri timely filed its 1st Revised Tariff Sheet No. 74.13 as substituted August 8, 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.

12. 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

⁶ Direct testimony of Marci L. Althoff, page 3, line 21 through page 4, line 4.

before the Commission that affects or is affected by this filing, except File No. ER-2017-0244 as noted herein.

WHEREFORE, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet filed on July 27, 2017, as substituted on August 8, 2017, to become effective on September 25, 2017, as requested by Ameren Missouri:

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

1st Revised Sheet No. 74.13, as substituted August 8, 2017, Cancelling Original Sheet No. 74.13.

Respectfully Submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709
Attorney for the Staff of the
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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-2018-0030, Tariff Tracking No. YE-2018-0011
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 08/28/2017

Energy Resources Department / Date

/s/ Bob Berlin 08/28/2017

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: August 28, 2017

On July 27, 2017, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one (1) tariff sheet, 1st Revised Sheet No. 74.13, as substituted August 8,¹ 2017, bearing a proposed effective date of September 25, 2017, and cancelling Original Sheet No. 74.13. The Commission assigned the tariff sheet to Tariff Tracking No. YE-2018-0011. The filed tariff sheet, 1st Revised Sheet No. 74.13, as substituted August 8, 2017, revises Ameren Missouri's Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 25 ("AP25") which ended on May 31, 2017. Staff recommends the Missouri Public Service Commission ("Commission") approve 1st Revised Sheet No. 74.13, as substituted August 8, 2017.

Ameren Missouri's July 27, 2017 filing includes the testimony of Ameren Missouri witness Marci L. Althoff and associated Ameren Missouri work papers. The testimony and work papers include information and data that supports Ameren Missouri's calculation of the dollar amount of its Fuel and Purchased Power Adjustment ("FPA"). That dollar amount ("FPA Amount") is \$(6,258,396) and is reflected on line 5 of 1st Revised Sheet No. 74.13, as substituted

¹ The Company filed its substitute tariff sheet on August 8, 2017 to correct a typographical error. More specifically, the tariff sheet filed on July 27 contained a transposed interest figure (reading \$562,936) when the correct interest figure is \$526,936. The testimony, schedules, and workpapers associated with the tariff sheet (see File Nos. ER-2018-0030 and ER-2018-0031) reflect the correct figure.

August 8, 2017. This FPA Amount results in a FAR₂₅² of \$(0.00029) per kWh, which when added to the FAR₂₄³ of \$0.00005 per kWh, results in a proposed FAR⁴ of \$(0.00024) per kWh. The proposed FAR of \$(0.00024) per kWh is \$0.00089 per kWh less than the current FAR⁵ of \$0.00065 per kWh.

Adjustment for Reduction of Service Classification 12 (M) or 13 (M) Billing Determinants⁶

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")⁷ calculation and an adjustment to the accumulation period sales to calculate Net Base Energy Cost ("B")⁸. 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-214-0258.

² FAR_{RP} is defined in Original Sheet No. 73.8 as "FAR Recovery Period rate component calculated to recover under- or over-collection during the Accumulation Period that ended immediately prior to the applicable filing." Since this filing occurred after the end of Accumulation Period 25, FAR_{RP} in this recommendation is referred to as FAR₂₅.

³ FAR_(RP-1) is defined in Original Sheet No. 73.8 as "FAR Recovery Period rate component for the under- or over-collection during the Accumulation Period immediately preceding the Accumulation Period that ended immediately prior to the application filing for FAR_{RP}." Since this filing occurred after the end of Accumulation Period 23, FAR_(RP-1) in this recommendation is referred to as FAR₂₂.

⁴ FAR is defined in Original Sheet No. 73.8 as "Fuel Adjustment Rate applied to retail customer usage on a per kWh basis starting with the applicable Recovery Period following the FAR filing." FAR = FAR_{RP} + FAR_{RP-1}.

⁵ The \$0.00065 per kWh rate is found on line 9 of 6th Revised Sheet No. 73.11.

⁶ Service Class12(M) is the Large Transmission Service Rate.

⁷ ANEC = fuel costs (FC) plus purchased power costs (PP) plus net emission allowances (E) minus off-system sales revenues (OSSR) as reflected on line 1 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017.

⁸ B = Base Factor times the accumulation period sales as reflected on lines 2, 2.1 and 2.2 of 1st Revised Sheet No. 74.13, as substituted August 8, 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} ⁹ 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 AP20.¹⁰

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-Factor¹¹ adjustment of \$437,526 to be retained by Ameren Missouri.

Staff reviewed the work papers of Company witness Marci L. Althoff’s Schedule MA-FAR and finds the adjustments to S_{AP} and to OSSR for AP25 to be correct and in accordance with the methodology 1) approved by the Commission on March 23, 2016, in its *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130, and 2) discontinued on April 1, 2017 as a result of its March 8, 2017 *Order Approving Unanimous Stipulation and Agreement* in Case No. ER-2016-0179.¹² For AP25 the Commission-approved methodology to determine the adjustments to S_{AP} and OSSR results in the following monthly and accumulation S_{AP} , OSSR and N-Factor amounts for AP25:

⁹ 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).

¹⁰ File No. ER-2016-0130 Non-unanimous Stipulation and Agreement filed on January 12, 2016 and approved by the Commission on January 20, 2016.

¹¹ N-Factor adjustment is the increase in the Fuel and Purchased Power Adjustment (FPA) 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.

¹² The Unanimous Stipulation and Agreement includes in its paragraph 3. FUEL ADJUSTMENT CLAUSE, A. vii.: The section regarding the adjustment for reduction of Service Classification 12(M) or 13(M) billing determinants and all references to the adjustment shall be removed from the tariff sheets.

Period	Adjustment to S_{AP} (kWh)	Adjustment to OSSR	N-Factor
February 2017	316,277,053	\$8,136,635	\$1,463,483
March 2017	333,901,659	\$6,931,913	\$2,363,475
April 2017	n/a	n/a	n/a
May 2017	n/a	n/a	n/a
AP25	650,178,712	\$15,068,548	\$3,826,958

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri’s work papers for AP25 contain data and calculations for ANEC equal to \$162,512,377¹³ (line 1 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017) and B equal to \$169,959,612¹⁴ (line 2 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017). For this filing, B is equal to sales of 10,366,150,785 kWh for February 2017 through May 2017 times \$0.01640¹⁵ per kWh. The difference between ANEC and B is equal to \$(7,447,235) and is the amount on line 3 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017, Total Company Fuel and Purchased Power Difference.

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

The primary factors driving this decrease below the base (Factor”B”) were lower fuel costs and higher net capacity revenues partially offset by lower off-system sales margins and the Adjustment for Reduction of Service Classification 12(M) or 13(M) Biling 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-2016-0130).¹⁶

Calculation of FPA Amount

Ameren Missouri’s work papers and 1st Revised Sheet No. 74.13, as substituted August 8, 2017, show the FPA Amount¹⁷ of \$(6,258,396) to be the sum of:

¹³ Actual Net Energy Cost (ANEC) of \$162,512,377 includes \$15,068,548 due to the adjustment to OSSR for AP25.

¹⁴ Net Base Energy Cost (B) of \$ includes \$ of net base energy cost due to an increase of the S_{AP} equal to kWh.

¹⁵ Summer Base Factor (BF_{Summer}) rate on Original Sheet No. 73.7 of \$0.01640 per kWh was used to calculate B (line 2 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017). BF_{Summer} is applicable for the February through May calendar months.

¹⁶ Company witness Marci L. Althoff’s direct testimony page 3, line 21 through page 4, line 4.

¹⁷ 1st Revised Sheet No. 74.13, as substituted August 8, 2017, lines 1 through 5 include the complete calculation of the FPA Amount of \$(6,258,396).

1. Fuel and purchased power amount to be recovered from customers for AP25 equal to \$(7,074,873)¹⁸ (Line 4 on 1st Revised Sheet No. 74.13, as substituted August 8, 2017); plus
2. Interest of \$526,936 which includes: \$(10,509) for AP25, \$537,445 for Recovery Period 22 (“RP22”); plus
3. The true-up amount, without interest, equal to \$289,541 which is pending Commission approval in File No. ER-2018-0031.

Calculation of FAR₂₅

FAR₂₅ of \$(0.00029) per kWh is equal to the FPA Amount of \$(6,258,396) divided by the Estimated Recovery Period Sales in kWh settled at MISO CP node (AMMO.UE or successor node) of 21,411,987,940 kWh. FAR₂₅ will apply during Recovery Period 25 (“RP25”)– Ameren Missouri’s billing months of October 2017 through May 2018.

Calculation of FAR Without Voltage Level Adjustments

Line 9 of Ameren Missouri’s proposed 1st Revised Sheet No. 74.13, as substituted August 8, 2017, reflects a FAR of \$(0.00024) per kWh which is the sum of: 1) FAR₂₅ of \$(0.00029) per kWh, and 2) FAR₂₄ of \$0.00005 per kWh.

Voltage Level FARs

Because of a difference in line losses,¹⁹ there may be different Initial Rate Components for service taken at the Secondary, Primary, and Transmission voltage levels reflected on lines 11, 13 and 15 of 1st Revised Sheet No. 74.13, as substituted August 8, 2017. The RP25 FARs are in the table below:

Service	RP25 FAR	Line on 1 st Revised Sheet No. 74.13
Secondary	\$(0.00026) /kWh	11
Primary	\$(0.00025) /kWh	13
Transmission	\$(0.00024) /kWh	15

¹⁸ Fuel and purchased power amount to be recovered from customers for AP25 is equal to ninety-five percent (95 %) of \$(7,447,235) (the difference between ANEC and B during AP25).

¹⁹ Secondary, Primary, and Transmission Voltage Adjustment Factors are shown on lines 10, 12, and 14, respectively, on Ameren Missouri’s proposed 1st Revised Sheet No. 74.13, as substituted August 8, 2017.

Listed below are the proposed RP25 FARs, the current RP24 FARs and the difference between them for Secondary, Primary, and Transmission service:

	Proposed RP25 FAR	Current RP24 FAR	Difference
Secondary	\$(0.00026) /kWh	\$0.00069/kWh	\$0.00095/kWh Decrease
Primary	\$(0.00025) /kWh	\$0.00067/kWh	\$0.00092/kWh Decrease
Transmission	\$(0.00024) /kWh	\$0.00065/kWh	\$0.00089/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 \$0.96, from \$0.70 to \$(0.26) per month.

Staff reviewed the proposed 1st Revised Sheet No. 74.13, as substituted August 8, 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 AP25. 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 1st Revised Sheet No. 74.13, as substituted August 8, 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 AP25.

Staff Recommendation

Ameren Missouri timely filed 1st Revised Sheet No. 74.13, as substituted August 8, 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 1st Revised Sheet No. 74.13, filed July 27, 2017, as substituted August 8, 2017, become effective on September 25, 2017, the beginning of the first billing cycle of Ameren Missouri's October 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 tariff sheet, as filed on July 27, 2017, and substituted on August 8, 2017, to become effective on September 25, 2017, as requested by Ameren Missouri:

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

1st Revised Sheet No. 74.13, as substituted August 8, 2017, Cancelling Original Sheet No. 74.13.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2016 Annual Report.²⁰ 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-2018-0031 as noted herein.

²⁰ 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 Adjustment of Union Electric Company)
d/b/a Ameren Missouri's Fuel Adjustment Clause for the) **File No. ER-2018-0030**
25th Accumulation Period)

AFFIDAVIT OF CURT B. GATELEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

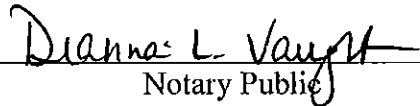
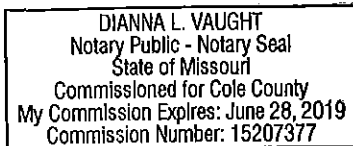
COMES NOW, Curt B. Gateley and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



Curt B. Gateley

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


Notary Public

**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 Fuel Adjustment Clause for the)
25th Accumulation Period) **File No. ER-2018-0030**

AFFIDAVIT OF RON IRVING

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

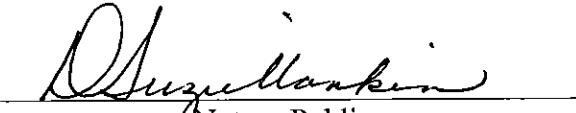
COMES NOW, Ron Irving and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

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

**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 Fuel Adjustment Clause for the) **File No. ER-2018-0030**
25th Accumulation Period)

AFFIDAVIT OF DAVID C. ROOS

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

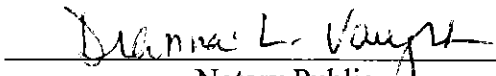
Further the Affiant sayeth not.



David C. Roos

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

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 16207377



Notary Public