

**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)	<u>Case No. ER-2016-0244</u>
Fuel Adjustment Clause for)	
The 18 th Recovery Period)	

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING
FOR AMEREN MISSOURI'S FUEL ADJUSTMENT CLAUSE
FOR THE 18TH 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 18th Fuel Adjustment Clause True-Up filing, March 24, 2016, with an effective date of May 25, 2016. Ameren Missouri's application would result in an adjustment to the amount collected through its fuel adjustment clause ("FAC") due to under-collection. Recovery Period 18 ("RP18") includes the billing months of June 2015 through January 2016 and followed Accumulation Period 18 that includes the period of October 1, 2014, through January 31, 2015. The Commission ordered Staff to conduct a review and file its Recommendation no later than April 25, 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 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 June 2015 through January 2016 during which the Company under-collected \$8,219,471 from its customers, the true-up amount for RP18, and the accrued interest of \$503,030 during RP18.

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

Respectfully Submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Deputy Staff Counsel

Missouri Bar No. 51709

Attorney for the Staff of the

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 25th day of April, 2016 to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2016-0244
Union Electric Company d/b/a Ameren Missouri

FROM: Matthew J. Barnes, Utility Regulatory Auditor IV
David Roos, Regulatory Economist III

DATE: /s/ John Rogers 04/25/2016 /s/ Bob Berlin 04/25/2016
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 Eighteenth 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 25, 2016

On March 24, 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 eighteenth 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 \$8,219,471 as identified in this filing is the result of an under-collection during Recovery Period 18 ("RP18") that includes the billing months of June 2015 through January 2016. RP18 is the recovery period for and following Accumulation Period 18 ("AP18") that includes the period of October 1, 2014 through January 31, 2015. On page 4 lines 7-15 of his direct testimony, Company Witness Erik C. Wenberg states the following:

There was an under-recovery of \$8,219,471 from customers for the 18th Recovery Period due to the shortfall resulting from the [\$0.002/kWh] rate cap [for rate class 13(M)] not being collected from Ameren Missouri customers, the difference between actual and estimated kWh sales, and recalculations using the S105 Midcontinent Independent System Operator, Inc. ("MISO") settlement statement. A majority of this under-recovery arose from the shortfall arising from the initial implementation of the \$0.002/kWh cap described above. After applying the interest to be recovered for the subject Accumulation Period of \$503,030 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 18th Recovery Period of \$8,722,501.

The true-up amount¹ without interest for RP18 of \$8,219,471 and the interest amount for RP18 of \$503,030 are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 21 (“AP21”) adjustment filing, also filed on March 24, 2016, in File No. ER-2016-0243, 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 RP18 true-up filing for the billing months June 2015 through January 2016 during which Ameren Missouri (1) under-collected \$8,219,471 from its customers, the true-up amount for RP18, and (2) accrued interest of \$503,030 during RP18.

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 RP18 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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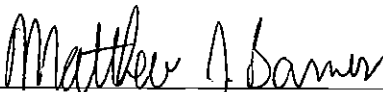
In the Matter of the True-Up of Union Electric)
Company d/b/a Ameren Missouri's Fuel Adjustment) **File No. ER-2016-0244**
Clause for the 18th Recovery Period) **Tariff No. YE-2016-0245**

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

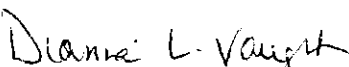
COMES NOW, Matthew J. Barnes and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



Matthew J. Barnes

Subscribed and sworn to be this 25th day of April, 2016.



Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377

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Company d/b/a Ameren Missouri's Fuel Adjustment) **File No. ER-2016-0244**
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AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

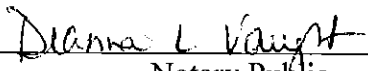
COMES NOW, David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Staff Recommendation in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



David C. Roos

Subscribed and sworn to be this 25th day of April, 2016.



Notary Public

