

**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-2017-0147**
Fuel Adjustment Clause for the Twenty-Third)
Accumulation Period)

**STAFF RECOMMENDATION TO APPROVE TARIFF SHEET REGARDING
CHANGE TO THE FUEL ADJUSTMENT RATE FOR ACCUMULATION PERIOD 23**

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 November 22, 2016, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a proposed tariff sheet, 5th 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 Fuel Adjustment Rates (“FARs”) used to calculate its Fuel Adjustment Clause (“FAC”) charge billed to its customers. The proposed tariff sheet bears a January 26, 2017 effective date.

2. Concurrently, on November 22, 2016, Ameren Missouri submitted a true-up filing in File No. ER-2017-0148 to identify the amount of over- or under-recovery during Recovery Period 20 (“RP20”) prescribed by its FAC. The over- or under-recovered amount (or true-up amount) and interest amount for RP20 are used when calculating the new FARs in this case.

3. On November 23, 2016, the Commission ordered Staff to examine and analyze Ameren Missouri’s filings in this case, and to file its recommendation no later

than December 22, 2016, 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 December 7, 2016.

4. Staff's 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 November 22, 2016.

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 bearing an effective date of January 26, 2017, that revises the current FARs in its FAC. The filing includes testimony and work papers of Ameren Missouri witness Erik C. Wenberg 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 amount is \$13,455,944.² The FPA amount³ is the sum of: Customer Responsibility for Accumulation Period 23 (“AP23”) equal to \$10,901,109⁴ (Line on 5th Revised Sheet No. 73.11); plus Interest for AP23 and RP20, equal to (\$709,489) (Line 4.1 on 4th Revised Sheet No. 73.11) which includes \$14,814 for AP23 and (\$724,303) for RP20; plus True-Up amount for RP20 without interest equal to \$3,264,324 (Line 4.2 on 5th Revised Sheet No. 73.11). This True-Up amount is before the Commission for approval in pending File No. ER-2017-0148.

8. As explained in Staff’s Memorandum, the FPA amount results in a Current Period Fuel Adjustment Rate (“FAR₂₃”) of \$0.00060 per kWh (Line 7 on 5th Revised Sheet No. 73.11) which, when added to the Prior Period FAR (FAR₂₂) of \$0.00057 per kWh (Line 8 on 5th Revised Sheet No. 73.11), results in a proposed FAR of \$0.00117 per kWh (Line 9 on 5th Revised Sheet No. 73.11), which is an increase of \$0.00060 per kWh when compared to the existing FAR of \$0.00057 per kWh. Because of a difference in line losses, the FAR is adjusted for the voltage at which customers receive service.

9. Because the Initial Rate Component for Large Transmission voltage service of \$0.00116 / kWh is less than \$0.00200 / kWh,⁵ the Initial Rate Components for Secondary, Primary and Large Transmission voltage levels are the Recovery Period (“RP23”) FARs for each service voltage level, and the Industrial Aluminum Smelter

² An amount not bracketed in parentheses represents an amount owed to the utility.

³ 5th Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of \$13,455,944.

⁴ The customer responsibility for AP23 is equal to ninety-five percent (95%) of \$ 11,474,852 (the difference between Actual Net Energy Cost (“ANEC”) and Net Base Energy Cost (“B”) during AP23).

⁵ 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.

("IAS") Service rate class FAR is equal to that of the Large Transmission voltage level rate class.

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

	Proposed RP21 FAR	Current RP20 FAR	Difference
Secondary	\$0.00124/kWh	(\$0.00060)/kWh	\$0.00064/kWh Increase
Primary	\$0.00120/kWh	(\$0.00058)/kWh	\$0.00060/kWh Increase
Large Transmission	\$0.00116/kWh	(\$0.00056)/kWh	\$0.00060/kWh Increase
IAS	\$0.00116/kWh	(\$0.00056)/ kWh	\$0.00060/kWh Increase

Based on a monthly usage of 1,090 kWh, the proposed change to the Secondary FAR would increase the Fuel Adjustment Charge of an Ameren Missouri residential customer's bill from \$0.61 to \$1.26 per month.

10. According to Ameren Missouri witness Erik C. Wenberg, "Ameren Missouri's ANEC during the June 1, 2016 to September 30, 2016 Accumulation Period increased by \$11,474,852 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."⁶

⁶ Direct testimony of Erik C. Wenberg, page 2, line 19 through page 3, line 4..

11. Staff has determined that Ameren Missouri timely filed the 5th Revised Tariff Sheet No. 73.11 as substituted on November 22, 2016, 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 2015 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-2017-0148 as noted herein.

WHEREFORE, Staff recommends the Commission issue an order approving the following proposed revised tariff sheet filed on November 22, 2016, to become effective on January 26, 2017, as requested by Ameren Missouri:

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

5th Revised Sheet No. 73.11 Cancelling 4th Revised Sheet No. 73.11.

Respectfully submitted,

/s/ Robert S. Berlin

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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 22nd day of December, 2016, to all counsel of record.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2017-0147, Tariff Tracking No. YE-2017-0078
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Ashley Sarver, Utility Regulatory Auditor IV
Curtis Gateley, Utility Policy Analyst II

/s/ John Rogers 12/22/2016
Energy Resources Dept. / Date

/s/ Bob Berlin 12/22/2016
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: December 22, 2016

On November 22, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed one (1) tariff sheet, 5th Revised Sheet No. 73.11, bearing a proposed effective date of January 26, 2017, and cancelling 4th Revised Sheet No. 73.11. The filed tariff sheet, 5th Revised Sheet No. 73.11, revises Ameren Missouri's Fuel Adjustment Rates ("FARs") of its Fuel Adjustment Clause ("FAC") for Accumulation Period 23 ("AP23") which ended on September 30, 2016. Staff recommends the Missouri Public Service Commission ("Commission") approve 5th Revised Sheet No. 73.11. The Commission assigned the tariff sheet to Tariff Tracking No. YE-2017-0078.

Ameren Missouri's November 22, 2016 filing includes the testimony of Ameren Missouri witness Erik C. Wenberg 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 \$13,455,944 and is reflected on line 5 of 5th Revised Sheet No. 73.11. This FPA Amount results in a FAR₂₃¹ of \$0.00060 per kWh, which when added to the FAR₂₂² of \$0.00057

¹ 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 23, FAR_{RP} in this recommendation is referred to as FAR₂₃.

² 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.

per kWh, results in a proposed FAR³ of \$0.00117 per kWh. The proposed FAR is \$0.00060 per kWh more than the current FAR⁴ of \$0.00057 per kWh.

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

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")⁵ calculation and an adjustment to the accumulation period sales to calculate Net Base Energy Cost ("B")⁶. 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.

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} ⁷ 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 AP20.⁸

³ 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." $FAR = FAR_{RP} + FAR_{RP-1}$.

⁴ The \$0.00000 per kWh rate is found on line 9 of 4th Revised Sheet No. 73.11.

⁵ 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 5th Revised Sheet No. 73.11.

⁶ B = Base Factor times the accumulation period sales as reflected on lines 2, 2.1 and 2.2 of 5th Revised Sheet No. 73.11.

⁷ 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).

⁸ File No. ER-2016-0130 Non-unanimous Stipulation and Agreement filed on January 12, 2016 and approved by the Commission on January 20, 2016.

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-Factor⁹ adjustment of \$437,526 to be retained by Ameren.

Staff reviewed the work papers of Company witness Erik C. Wenberg's Schedule EW-FAR and finds the adjustments to S_{AP} and to OSSR for AP23 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 AP23 the Commission-approved methodology results in the following monthly and accumulation period amounts:

Period	Adjustment to S_{AP} (kWh)	Adjustment to OSSR	N-Factor
June 2016	221,368,604	\$5,014,927	\$1,039,147
July 2016	293,705,707	\$7,526,817	\$2,251,863
August 2016	260,894,451	\$6,599,556	\$1,913,891
September 2016	241,526,477	\$6,100,246	\$1,762,430
AP23	1,017,495,239	\$25,241,546	\$6,967,331

Calculation of Total Company Fuel and Purchased Power Difference

Ameren Missouri's work papers for AP23 contain data and calculations for ANEC equal to \$263,286,202¹⁰ (line 1 of 5th Revised Sheet No. 73.11) and B equal to \$251,811,350¹¹ (line 2 of 5th Revised Sheet No. 73.11). For this filing, B is equal to sales of 14,020,676,501 kWh for June 2016 through September 2016 times \$0.01796¹² per kWh. The difference between ANEC and B is equal to \$11,474,852 and is the amount on line 3 of 5th Revised Sheet No. 73.11 Total Company Fuel and Purchased Power Difference.

Calculation of FPA Amount

Ameren Missouri's work papers and 5th Revised Sheet No. 73.11 show the FPA Amount¹³ of \$13,455,944 to be the sum of:

⁹ 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.

¹⁰ Actual Net Energy Cost (ANEC) of \$263,286,202 includes \$6,618,965 due to the adjustment to OSSR for AP23.

¹¹ Net Base Energy Cost (B) of \$ includes \$ of net base energy cost due to an increase of the S_{AP} equal to kWh.

¹² Summer Base Factor (BF_{Summer}) rate on Original Sheet No. 73.7 of \$0.01796 per kWh was used to calculate B (line 2 of 5th Revised Sheet No. 73.11). BF_{Summer} is applicable for the June through September calendar months.

¹³ 5th Revised Sheet No. 73.11 lines 1 through 5 include the complete calculation of the FPA Amount of \$13,455,944.

1. Fuel and purchased power amount to be recovered from customers for AP23 equal to \$10,901,109¹⁴ (Line 4 on 5th Revised Sheet No. 73.11); plus
2. Interest of (\$709,489) which includes: \$14,814 for AP23, (\$724,303) for Recovery Period 20 (“RP20”); plus
3. The true-up amount, without interest, equal to \$3,264,324 which is pending Commission approval in File No. ER-2017-0148.

Calculation of FAR₂₃

FAR₂₃ of \$0.00060 per kWh is equal to the FPA Amount of \$13,455,944 divided by the Estimated Recovery Period Sales in kWh settled at MISO CP node (AMMO.UE or successor node) of 22,480,347,958 kWh. FAR₂₃ will apply during Recovery Period 23 (“RP23”) - Ameren Missouri’s billing months of February 2017 through September 2017 and during Recovery Period 24 – 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 5th Revised Sheet No. 73.11, reflects a FAR of \$0.00117 per kWh which is the sum of: 1) FAR₂₃ of \$0.00060 per kWh, and 2) FAR₂₂ of \$0.00057 per kWh.

Voltage Level FARs

Because of a difference in line losses,¹⁵ 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 5th Revised Sheet No. 73.11. Because the Initial Rate Component for Transmission voltage service of \$0.00116 / kWh is less than \$0.00200 / kWh,¹⁶ the Initial Rate Components for Secondary, Primary and Transmission voltage levels are the RP23 FARs for each service voltage level and the Industrial Aluminum Smelter (“IAS”) Service rate class FAR is equal to that of the Transmission voltage level rate class. The RP23 FARs are in the table below:

Service	RP23 FAR	Line on 5 th Revised Sheet No. 73.11
Secondary	\$0.00124/kWh	21
Primary	\$0.00120/kWh	22
Transmission	\$0.00116/kWh	23
IAS	\$0.00116/kWh	16

¹⁴ Fuel and purchased power amount to be recovered from customers for AP23 is equal to ninety-five percent (95 %) of \$11,474,852 (the difference between ANEC and B during AP23).

¹⁵ Secondary, Primary, and Transmission Voltage Adjustment Factors are shown on lines 10, 12, and 14, respectively, on Ameren Missouri’s proposed 5th Revised Sheet No. 73.11.

¹⁶ The Commission’s Report and Order in Case No. ER-2015-0258 created a new Industrial Aluminum Smelter (IAS) Rate Class for which the FAR IAS rate is capped at \$0.00200 per kWh.

Listed below are the proposed RP23 FARs, the current RP22 FARs and the difference between them for Secondary, Primary, and Transmission and IAS service:

	Proposed RP23 FAR	Current RP22 FAR	Difference
Secondary	\$0.00124/kWh	\$0.00060/kWh	\$0.00064/kWh Increase
Primary	\$0.00120/kWh	\$0.00058/kWh	\$0.00062/kWh Increase
Transmission	\$0.00116/kWh	\$0.00056/kWh	\$0.00060/kWh Increase
IAS	\$0.00116/kWh	\$0.00056/kWh	\$0.00060/kWh Increase

Based on a monthly usage of 1,090 kWh, the proposed change to the Secondary FAR would increase the Fuel Adjustment Charge of an Ameren Missouri residential customer's monthly bill by \$0.65, from \$0.61 to \$1.26 per month.

In his filed direct testimony, Company witness Erik C. Wenberg 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-2016-0130) and lower off-system sales margins, partially offset by higher net capacity revenues.¹⁷

Staff reviewed the proposed 5th Revised Sheet No. 73.11, the direct testimony of Ameren Missouri witness Erik C. Wenberg 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 AP23. 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 5th Revised Sheet No. 73.11, and the supporting schedules of witness Erik C. Wenberg. 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 AP23.

¹⁷ Company witness Erik C. Wenberg's direct testimony page 2, line 21 through page 3 line 4.

Staff Recommendation

Ameren Missouri timely filed 5th Revised Sheet No. 73.11, 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 5th Revised Sheet No. 73.11, filed November 22, 2016, become effective on January 23, 2017, the beginning of the first billing cycle of Ameren Missouri's February 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 November 22, 2016, to become effective on January 23, 2017, as requested by Ameren Missouri:

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

5 Revised Sheet No. 73.11 Cancelling 4th Revised Sheet No. 73.11.

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2015 Annual Report.¹⁸ 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-2017-0148 as noted herein.

¹⁸ Ameren Missouri filed its 2015 Annual Report on April 15, 2016.

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

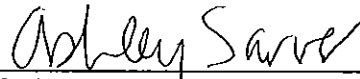
In the Matter of the Adjustment of Union)
Electric Company d/b/a Ameren Missouri's)
Fuel Adjustment Clause for the Twenty-Third)
Accumulation Period)
Case No. ER-2017-0147

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Ashley Sarver and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Memorandum; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



Ashley Sarver

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 21st day of December, 2016.

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



NOTARY PUBLIC