

**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 ) **Case No. ER-2017-0148**  
Fuel Adjustment Clause for the Twentieth )  
Recovery Period )

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN  
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 20<sup>TH</sup> 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 20<sup>th</sup> Fuel Adjustment Clause True-Up filing on November 22, 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 20 ("RP20") includes the billing months of February 2016 through September 2016 and followed Accumulation Period 20 that included the period of June 1, 2015, through September 3, 2015. The Commission ordered Staff to conduct a review and file its recommendation no later than December 22, 2016.

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 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 2016 through September 2016 during which the Company under-collected \$3,264,324 from its customers,<sup>1</sup> the true-up amount for RP20, and accrued interest of (\$724,303)<sup>2</sup> for RP20, resulting in a total under-recovery from customers of \$2,540,021 during RP20.

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

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<sup>1</sup> Under-recovery of \$3,264,324 was due to the difference between actual and estimated kWh sales.

<sup>2</sup> The amount of \$724,303 is accrued interest on the total amount to be recovered in RP20.

Respectfully Submitted,

**/s/ Robert S. Berlin**

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**/s/ Casi Aslin**

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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 22<sup>nd</sup> 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-2017-0148  
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III  
Ashley Sarver, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 12/22/2016      /s/ Bob Berlin 12/22/2016  
Energy Resources Dept. / Date      Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company d/b/a Ameren Missouri's Twentieth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: December 22, 2016

On November 22, 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 twentieth 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 \$3,264,324 as identified in this filing is the result of an under-collection during Recovery Period 20 ("RP20") that includes the billing months of February 2016 through September 2016. RP20 is the recovery period for and following Accumulation Period 20 ("AP20") that includes the period of June 1, 2015 through September 30, 2015. On page 4 lines 1-8 of his direct testimony, Company Witness Erik C. Wenberg states the following:

"There was an under-recovery of \$3,264,324 from customers for the 20<sup>th</sup> 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 (\$724,303), 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 20<sup>th</sup> Recovery Period of \$2,540,021. Schedule EW-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 amount<sup>1</sup> without interest for RP20 of \$3,264,324 and the interest amount for RP20 of (\$724,303) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 23 (“AP23”) adjustment filing, also filed on November 22, 2016, in File No. ER-2017-0047, in compliance with Ameren Missouri’s FAC.<sup>2</sup>

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 RP20 true-up filing for the billing months February 2016 through September 2016 during which Ameren Missouri (1) under-collected \$3,264,324 from its customers, the true-up amount for RP20, and (2) accrued interest of (\$724,303) during RP20.<sup>3</sup>

Staff has verified that Ameren Missouri has filed its 2015 annual report<sup>4</sup> 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.

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<sup>1</sup> See Schedule EW-TU attached to the direct testimony of Erik C. Wenberg for calculation of the RP20 true-up adjustment amounts with interest and without interest.

<sup>2</sup> 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.”

<sup>3</sup> Accrued interest of (\$724,303) during RP20 includes AP20 interest of \$5,949 and interest for True-Up Period 17 of (\$730,252). See page 1 of Schedule EW-TU attached to the direct testimony of Erik C. Wenberg. Note: an amount in parenthesis is a credit to the customer.

<sup>4</sup> Ameren Missouri filed its 2015 Annual Report on April 15, 2016.

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Electric Company d/b/a Ameren Missouri's                )  
Fuel Adjustment Clause for the Twentieth                )  
Recovery Period   )         **Case No. ER-2017-0148**

**AFFIDAVIT**

State of Missouri     )  
                                   ) ss.  
County of Cole        )

**COMES NOW** David Roos 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.

  
\_\_\_\_\_ **David Roos**

**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 21<sup>st</sup> day of December, 2016.

  
\_\_\_\_\_ **NOTARY PUBLIC**

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

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

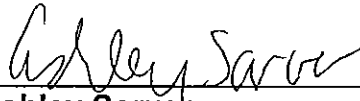
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Case No. ER-2017-0148

**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 21<sup>st</sup> day of December, 2016.

  
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NOTARY PUBLIC

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