

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s Tariffs to Decrease Its)
Revenues for Electric Service)

Case No. ER-2019-0335

STAFF RESPONSE TO TEST YEAR PROPOSAL

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its Response to Test Year Proposal respectfully states as follows:

1. On July 9, 2019, the Commission issued an *Order Setting Procedural Conference, Directing Notice, Establishing Intervention Deadline, and Setting Time for Responses* (“Order”).

2. Among other things, the Order provided that “Responses to the historical test year ending December 31, 2018, adjusted through December 31, 2019, as proposed by Union Electric Company, d/b/a Ameren Missouri, shall be filed no later than July 22, 2019.”

3. The specific test year proposal of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) in this case is found in the Direct Testimony (page 3) of Company witness Laura M. Moore. Ms. Moore’s testimony states in relevant part that “The Company is proposing a test year consisting of the twelve months ended December 31, 2018, with pro forma adjustments to account for the true-up of various items through December 31, 2019.” In other words, Ameren Missouri is proposing a 12 month true-up, resulting in an entire year between the end of the test year and the end of true-up.

4. Because Ameren Missouri's proposed true-up is one full year after the end of the test year, Staff submits the following as a modification of Ameren Missouri's proposal: Staff proposes a test year of the 12 months ending December 31, 2018, *updated through* June 30, 2019, with a *true-up through* December 31, 2019 (or January 1, 2020 for certain items¹). Under Staff's proposal, the true-up will only be addressing a 6 month period of time rather than a year, but Ameren Missouri will still get its true-up through the end of 2019.

WHEREFORE, Staff submits this Response to Test Year Proposal as directed by the Commission's *Order Setting Procedural Conference, Directing Notice, Establishing Intervention Deadline, and Setting Time for Responses* and prays the Commission issue an order adopting Staff's proposed test year/update/true-up periods for this case as set forth above.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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¹ Certain items that occur on January 1, 2020 will be trued-up, including changes in contractual commodity coal costs and coal transportation costs, wage and salary increases, and MISO Schedule 26A transmission charges, as long as a proper relationship of all other revenues, expenses and rate base is maintained. Each true-up item must be known and measurable, recorded in Ameren Missouri's accounting system, and supported by documentation (including but not limited to invoices, inspections, general ledgers, operating reports, etc.) that demonstrate it has occurred; and, if the true-up item is rate based capital investment, that the investment is fully operational and used for service.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 22nd day of July, 2019.

/s/ Jeffrey A. Keevil