

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

Noranda Aluminum, Inc., et al.,)	
)	
Complainants,)	
)	
vs.)	<u>Case No. EC-2014-0223</u>
)	
Union Electric Company, doing business as Ameren Missouri,)	
)	
Respondent.)	

STAFF'S STATEMENT OF POSITION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and submits the following *Statement of Position*:

- 1. Can and should the Commission order a reduction in Ameren Missouri's rates as proposed by Complainants, to apply to service rendered after the conclusion of this case?**

It is Staff's opinion that the Complaint has not been supported by adequate evidence of material and continuing overearnings on the part of Ameren Missouri and fails to consider "all relevant factors" in its revenue requirement analysis. Staff conducts an earnings investigation when a utility's current rates appear to produce earnings that materially exceed its authorized return on equity ("ROE") and the excessive earnings are likely to be ongoing. Staff's analysis shows that Ameren Missouri's current possible overearnings are significantly lower than Complainants assert and are not likely to be ongoing. Therefore, Staff recommends that the Commission not order a reduction in Ameren Missouri's rates for service rendered after the conclusion of this case. Staff will conduct a full review of Ameren Missouri's earnings in Case No. ER-2014-0258.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **22nd day of July, 2014**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Kevin A. Thompson