

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

In The Matter of the Application of Union)	
Electric Company, d/b/a Ameren Missouri for)	
For Authorization to Manage Sulfur Dioxide)	<u>File No. EO-2015-0320</u>
Emission Allowance Inventory ¹)	

**STAFF’S REPLY TO AMEREN MISSOURI’S RESPONSE
TO STAFF’S RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and in its *Reply to Ameren Missouri’s Response to Staff’s Recommendation* in this matter hereby states:

1. Staff of the Missouri Public Service Commission (Staff) filed its *Recommendation to Approve Application with Limits* on July 31, 2015. Ameren Missouri filed its *Response to Staff’s Recommendation* August 10, 2015, which included an interpretation of Staff’s paragraph 5(A) of its *Recommendation*.

2. Ameren Missouri interprets Staff’s paragraph 5(A) to mean that proceeds of the sale of SO₂ and NO_x emissions will flow through Ameren Missouri’s fuel adjustment clause (FAC) with a 95/5 sharing factor. Staff agrees with Ameren Missouri’s interpretation of this provision and intended the language to have the interpreted effect.

¹ Note that Ameren Missouri in its *Application* also requests authority to manage its nitrogen oxide allowance inventory.

WHEREFORE, Staff prays that the Commission will accept its *Reply to Ameren Missouri's Response to Staff's Recommendation* as an answer to Ameren Missouri's implicit request for clarification; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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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 18th day of August, 2015, to all counsel of record.

/s/ Whitney Payne