



December 3, 2018

Mr. Morris Woodruff
Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

RE: Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri")
Case No.: GR-2019-0077

Dear Mr. Woodruff:

Filed concurrently with this letter is a cover letter from Ameren Missouri's Corporate Counsel, Jermaine Grubbs, with which is included certain tariff sheets consisting of gas rate schedules designed to increase Ameren Missouri's gas base rate annual revenues by approximately \$4.26 million. The above-cited figures are exclusive of applicable gross receipts, sales, franchise or occupational fees or taxes. The proposed tariff sheets bear a date of issue of December 3, 2018, and an effective date of January 2, 2019.

The test year employed by the Company is the 12 months ending June 2018, with certain pro-forma adjustments to include known and measurable items through May 31, 2019, the true-up cutoff date the Company will request in this case, as discussed in the direct testimony of Ameren Missouri witness Laura M. Moore.

The rate increase sought by this filing is driven by several factors. These include rate base additions since the last gas general rate case (Case No. GR-2010-0363) and depreciation rate changes. Other drivers for the filing of this general rate case are the Company's desire to begin flowing back the benefit of the federal income tax decrease to customers, and the Company's desire to restart its Infrastructure System Replacement Surcharge ("ISRS").

Also included herein or in Schedules to this letter is the information required by 4 CSR 240-3.030(3)(B), as follows:

- 3(B)1.** See Schedule 1.
- 3(B)2.** See Schedule 2.
- 3(B)3.** See Schedule 3.
- 3(B)4.** See Schedule 4.
- 3(B)5.** See Schedule 5.
- 3(B)6.** There is no press release.

3(B)7. The rate change sought by this filing is needed for the following reasons:

- Update our general rates to reflect rate base additions since the last natural gas general rate case (Case No. GR-2010-0363) and depreciation rate changes;
- Reflect the impact of the 2018 Tax Cuts and Jobs Act; and
- Allow the Company to restart its Infrastructure System Replacement Surcharge.

As required by 4 CSR 240-2.065(1), this filing includes Ameren Missouri's direct testimony relating to this general rate increase request. Direct Testimony is provided by the following witnesses:

Warren Wood	Overview of Company and Rate Increase Request; Policy; Introduction of Company Witnesses
Brenda Weber	Lead/Lag Study; Capital Structure
Michael Harding	Rate Design; PGA Consolidation; Misc. Tariff Updates; Normalization of Weather and Class Demands
Robert B. Hevert	Rate of Return
Laura Moore	Revenue Requirement
Ryan Ryterski	Class Cost of Service Study
John Wiedmayer	Depreciation
Laureen Welikson	Energy Efficiency; Low Income Program; Red Tag Program

I request that you please bring this filing to the attention of the appropriate Commission personnel and see that a copy of all correspondence, notices, orders or other communications in connection with this matter and proceeding are furnished to the undersigned counsel for Ameren Missouri at the addresses listed in the letterhead above, and also to the following persons:

Paula N. Johnson
Senior Corporate Counsel
Ameren Missouri
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
Telephone: (314) 554-3533
Facsimile: (314) 554-4014
AmerenMOService@ameren.com

Jermaine Grubbs
Corporate Counsel
Ameren Services Company
Wendy Tatro
Director and Assistant General Counsel
Ameren Missouri
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
Telephone: (314) 554-2041
Facsimile: (314) 554-4014
AmerenMOService@ameren.com

L. Russell Mitten
Brydon, Swearingen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 634-7431
rmitten@brydonlaw.com

Dean L. Cooper
Brydon, Swearingen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 634-7431
dcooper@brydonlaw.com

Thank you for your assistance with this filing. Should you have any questions, please contact me.

Sincerely,

/s/ Jermaine Grubbs

Jermaine Grubbs

cc/enc: Missouri Public Service Commission General Counsel
Office of the Public Counsel

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

AGGREGATE ANNUAL INCREASE

The aggregate annual increase over current revenues produced by current base rates proposed in the tariffs is \$4,264,318 for Ameren Missouri, which is an overall increase of a customer's total bill (including Purchased Gas Adjustment charges) of 3.3% on a pro forma basis.

UNION ELECTRIC COMPANY

d/b/a AMEREN MISSOURI

Missouri Natural Gas Operations

COMMUNITIES AFFECTED BY FILING

Advance	Hallsville	Painton
Ashland	Hartsburg	Perkins
Ash Hill	Hawk Point	Pierpont
Auxvasse	Higbee	Prairie Home
Blackwater	High Hill	Prathersville
Bloomfield	High Point	Randles
Boonville	Hinton	Renick
Browns Station	Holts Summit	Rivers Addition
Cairo	Huntsville	Rocheport
California	Idalia	Rolla
Cape Girardeau	Jamestown	Russellville
Center	Jefferson City	St. Martins
Centertown	Jonesburg	Salem
Centralia	Kelso	Scott City
Circle City	Ladonia	Silex
Clark	Lohman	Stover
Clarksville	Louisiana	Sturgeon
Columbia	Marble Hill	Troy
Curryville	Maryknoll	Truesdale
Delta	Martinsburg	Truxton
Dexter	McGirk	Vandalia
Eldon	Mexico	Vandiver
Elsberry	Midway	Vanduser
Elston	Moberly	Versailles
Essex	Moscow Mills	Wardsville
Farber	Nelson	Warrenton
Fisk	New Bloomfield	Wellsville
Flint Hill	New Franklin	Wentzville
Foley	New London	Winfield
Foristell	Old Monroe	Wright City
Franklin	Olean	
Glen Allen	Owensville	
Grayridge		

UNION ELECTRIC COMPANY
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Missouri Natural Gas Operations

COUNTIES AFFECTED BY FILING

Audrain County
Bollinger County
Boone County
Butler County
Callaway County
Cape Girardeau County
Cole County
Cooper County
Dent County
Gasconade County
Howard County
Lincoln County
Miller County
Moniteau County
Montgomery County
Morgan County
Phelps County
Pike County
Ralls County
Randolph County
St. Charles County
Saline County
Scott County
Stoddard County
Warren County

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
Missouri Natural Gas Operations

**NUMBER OF CUSTOMERS AFFECTED BY GENERAL
CATEGORY OF SERVICE AND RATE CLASSIFICATION**
AVERAGE FOR TWELVE MONTHS ENDING JUNE 2018

<u>Service and Rate Classification*</u>	<u>Number of Customers</u>
Residential Service	117,503
General Service	12,841
Interruptible Service	6
Transportation Service	
Standard Transportation	665
Large Volume Transportation	20
Special Contract	<u>5</u>
TOTAL CUSTOMERS	131,040

* Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

UNION ELECTRIC COMPANY

d/b/a AMEREN MISSOURI

Missouri Natural Gas Operations

**PROPOSED AVERAGE ANNUAL CHANGE REQUESTED IN DOLLARS
AND PERCENTAGE CHANGE FROM CURRENT RATES***

TWELVE MONTHS ENDING JUNE 2018

<u>Service and Rate Classification**</u>	<u>Average Annual Change</u>	<u>Percentage Change</u>
Residential Service	\$ 26	3.8%
General Service	\$ 106	4.2%
Interruptible Service	\$ 8,324	5.7%
Transportation Service		
Standard Transportation	\$ (363)	-1.5%
Large Volume Transportation	\$ 3,227	0.5%

* Includes a weighted average PGA factor of 46.66¢/Ccf and 31.87¢/Ccf for Firm (Residential and General Service) and Interruptible Service respectively, and an assumed 24.00¢/Ccf gas for Transportation Service.

** Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

UNION ELECTRIC COMPANY

d/b/a AMEREN MISSOURI

Missouri Natural Gas Operations

**PROPOSED ANNUAL AGGREGATE CHANGE AND
PERCENTAGE CHANGE IN REVENUES FROM CURRENT RATES***

<u>Service and Rate Classification**</u>	<u>Annual Aggregate Change</u>	<u>Percentage Change</u>
Residential Service	\$ 3,023,999	3.8%
General Service	\$ 1,359,484	4.2%
Interruptible Service	\$ 56,879	5.7%
Transportation Service		
Standard Transportation	\$ (241,665)	-1.5%
Large Volume Transportation	\$ 65,621	0.5%
TOTAL	\$ 4,264,318	***3.3%

* Includes a weighted average PGA factor of 46.66¢/Ccf and 31.87¢/Ccf for Firm (Residential and General Service) and Interruptible Service respectively, and an assumed 24.00¢/Ccf gas for Transportation Service.

** Ameren Missouri's general categories of service and rate classifications for natural gas service are substantially the same.

*** Includes revenues from late payments, special contract customers, and Miscellaneous Charges and excludes assumed price of gas for Transportation Service customers.