

**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 Containing Its)
Annual Fuel Adjustment Clause Mechanism) **File No. ER-2014-0164**

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 11TH RECOVERY PERIOD**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through counsel, and for its recommendation respectfully states:

1. On November 27, 2013, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed a true-up to its Fuel Adjustment Clause ("FAC") to identify the amount of over- or under-recovery during the previous 8-month FAC recovery period, as required by Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. The true-up amount for the 11th Recovery Period identified in this case is included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in the Company's 14th Accumulation Period filing in File No. ER-2014-0163, also filed on November 27.

3. On December 2, the Commission ordered Staff to file a recommendation regarding its examination and analysis of the true-up filing by no later than December 27, 2013, as required by Commission Rule 4 CSR 240-20.090(5)(D).

4. Rule 4 CSR 240-20.090(5)(D) also requires the Commission to issue an order deciding the true-up within 60 days of Ameren Missouri's filing, or, if no order is

issued, the rule provides that the tariff schedules and rate adjustments shall take effect by operation of law 60 days after filing.

5. As explained in Staff's *Memorandum*, attached here as Appendix A and incorporated by reference, Staff recommends that the Commission approve Ameren Missouri's true-up filing for the 11th Recovery Period.

6. Staff reviewed and analyzed the direct testimony and supporting schedules of Ameren Missouri witness Erik C. Wenberg. Staff found that Ameren Missouri's calculations for the true-up amounts and interest for the 11th Recovery Period (the billing months February 2013 through September 2013) are correct. The under-collected amount of \$105,339¹ is included in Ameren Missouri's calculation of its requested current period FPA in File No. ER-2014-0163, also filed November 27, 2013.

7. Staff has verified that Ameren Missouri filed its 2012 annual report and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring Report as required by 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 File No. ER-2014-0163 noted above.

WHEREFORE, Staff submits its analysis of the Company's true-up filing and recommends that the Commission approve Ameren Missouri's true-up filing for the 11th Recovery Period, under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

¹ This amount includes accumulated interest.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 20th day of December, 2013.

/s/ Robert S. Berlin