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 Increase)	Case No. ER-2016-0179
Its Revenues for Electric Service)	
)	

PUBLIC COUNSEL'S RESPONSE TO AMEREN MISSOURI'S PROPOSED TEST YEAR

COMES NOW the Office of Public Counsel ("OPC" or "Public Counsel"), by and through counsel, and as related to the Public Service Commission ("Commission") in its July 12, 2016, Notice Of Hearing; Order Setting Conference Date, Directing Notice Of Action, Establishing Intervention Date, And Directing Filings for its Response to Ameren Missouri's Proposed Test Year, states for its Response to Ameren Missouri's Proposed Test Year as follows:

- 1. OPC believes, generally, a calendar year-ending test year is always the best test year to use for several reasons. The primary reason being the test year financial information provided by the utility can more easily be compared with published and audited financial statements, such as the investor-owned utility's ("IOU's") SEC Form 10-K annual report. OPC notes that Kansas City Power & Light Company ("KCPL") filed a rate case on the same date as Ameren Missouri UE ("Ameren") and KCPL appropriately selected a calendar year ended 2015 test year with the same December 31, 2016 true-up as proposed by Ameren.
- 2. Recognizing that Ameren filed in its direct filing a proposed cost of service with a first quarter 2016 test year, OPC is not requesting a different test year in this case. However, OPC urges the Commission to advise IOU's to file rate cases with calendar-year ended test years when rate cases are filed within approximately the first six months of the year as a general practice. Filing calendar-year ended test years should reduce the number of data requests and

audit work for the rate case auditors. In addition, filing calendar-year ended test years provides additional confidence that the test year data is free of material errors as this is an important scope of the IOU's outside auditors that audit the utility's books and records.

3. OPC does not oppose Ameren's proposed test year consisting of the twelve months ending March 31, 2016, with a true-up cutoff date of December 31, 2016.

4. OPC agrees that all items of Ameren's rate base should be trued up through December 31, 2016 including capital structure and capital costs. In addition, all significant income statement and income tax items should be trued up as well. OPC reserves the right to propose and include items in Ameren's true-up revenue requirement it finds reasonable and necessary.

WHEREFORE Public Counsel respectfully submits its Response to Ameren Missouri's Proposed Test Year.

Respectfully submitted,
OFFICE OF THE PUBLIC COUNSEL

By: /s/ James M. Owen

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties in Case No. ER-2016-0179 on this 20^{th} day of July 2016.

/s/ James M. Owen