

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

In the Matter of the True-Up of Union Electric)	<u>File No. ER-2014-0262</u> JE-2014-0372
Company d/b/a Ameren Missouri's Fuel Adjustment)	
Clause for the 12th Recovery Period)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its recommendation states as follows:

1. On March 28, 2014, 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 and 4 CSR 240-20.090.

2. The true-up amount for the 12th Recovery Period identified in this case is included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount in the Company's 15th Accumulation Period filing in File No. ER-2014-0261, also filed on March 28, 2014.

3. On March 31, 2014, the Commission ordered Staff to file a recommendation regarding its examination and analysis of the true-up filing by no later than April 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 12th 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 12th Recovery Period (the billing months June 2013 through January 2014) are correct. The over-collected amount of \$270,186 is included in Ameren Missouri's calculation of its requested current period FPA in ER-2014-0261, also filed March 28, 2014.

7. Staff has verified that Ameren Missouri filed its 2013 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-2014-0261 noted above.

WHEREFORE, Staff submits its analysis and recommends that the Commission approve Ameren Missouri's true-up filing for the 12th Recovery Period, under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

Assistant Staff Counsel

Missouri Bar No. 65487

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 28th day of April, 2014.

/s/ Alexander Antal

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2014-0262
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Matthew J. Barnes, Utility Regulatory Auditor IV

DATE: /s/ John Rogers 04/25/2014 /s/ Alexander Antal 04/25/2014
Energy Resource Analysis Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Analysis of and Recommendation Concerning Union Electric Company d/b/a Ameren Missouri's Twelfth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: April 25, 2014

On March 28, 2014, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") in the form of direct testimony and supporting schedules by Erik C. Wenberg, its twelfth true-up filing under the provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount of \$(270,186) identified in this filing is the result of an over-collection during Recovery Period 12 ("RP12") that includes the billing months of June 2013 through January 2014. RP12 is the recovery period for and following Accumulation Period 12 ("AP12") that includes the period of October 1, 2012 through January 31, 2013.

The \$(145,032)¹ true-up amount for RP12, with interest, is included in the calculation of the Fuel and Purchased Power Adjustment ("FPA") amount included in the Company's Accumulation Period 15 ("AP15") adjustment filing, also filed on March 28, 2014, in File No. ER-2014-0261, in compliance with Ameren Missouri's FAC.² Attachment 1 shows the true-up calculation for the twelfth true-up without interest.

¹ See Page 1 of 5 of Schedule EW-TU of the direct testimony of Erik C. Wenberg for calculation of the RP12 true-up adjustment with interest amount.

² Union Electric Company's Schedule No. 5, Original Sheet No. 72.8: "TRUE-UP: After completion of each RP, the Company shall make a true-up filing on the same day as its FAR (Fuel Adjustment Rate) filing. Any true-up adjustments shall be reflected in item T above. Interest on the true-up adjustment will be included in I above. The true-up adjustments shall be the difference between the revenues billed and the revenues authorized for collection during the RP."

Staff examined the direct testimony of Erik C. Wenberg, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly information Ameren Missouri has submitted to the Commission. Staff also reviewed Ameren Missouri's monthly interest calculations; Staff agrees with them.

Based on its examination and analysis of information Ameren Missouri filed and submitted in this case, Staff recommends the Commission approve Ameren Missouri's RP12 true-up filing for the billing months June 2013 through January 2014 during which Ameren Missouri over-collected \$270,186 from its customers for inclusion in the calculation of the FPA amount included in the Company's AP15 adjustment filing in File No. ER-2014-0261.

Staff has verified that Ameren Missouri has filed its 2013 annual report and is not delinquent on any assessment. Ameren Missouri is current on its submission of its Surveillance Monitoring reports as required in 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 as noted herein.

Ameren Missouri
Fuel Adjustment Clause
Accumulation Period #12 True-Up
(Without Interest)

Accumulation Period: October 2012 – January 2013
Recovery Period: June 2013 – January 2014

Amount to be Recovered	\$	52,679,828
True -Up Period # 12	\$	(1,248,391)
Recoveries	\$	<u>(51,701,623)</u>
Proposed Adjustment	\$	(270,186)

(Line 4.1, 3rd Rev. Sht. 72.9)

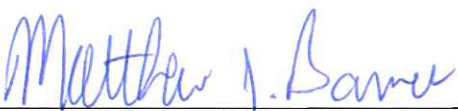
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OF THE STATE OF MISSOURI

In the Matter of the True-Up of Union)
Electric Company d/b/a Ameren)
Missouri's Fuel Adjustment Clause for)
the 12th Recovery Period)
Case No. ER-2014-0262

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Matthew J. Barnes, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Matthew J. Barnes

Subscribed and sworn to before me this 28th day of April, 2014.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086



Notary Public


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Electric Company d/b/a Ameren)
Missouri's Fuel Adjustment Clause for)
the 12th Recovery Period)
Case No. ER-2014-0262

AFFIDAVIT OF DAVID C. ROOS

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David C. Roos, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



David C. Roos

Subscribed and sworn to before me this 28th day of April, 2014.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
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Notary Public