

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

In the Matter of the Adjustment of Union Electric)
Company d/b/a Ameren Missouri's Fuel Adjustment)
Clause for the 17th Accumulation Period.) Case No. ER-2015-0128

THE OFFICE OF THE PUBLIC COUNSEL'S RESPONSE

COMES NOW the Missouri Office of the Public Counsel (Public Counsel) and for its Response states as follows:

1. On December 23, 2014, Public Counsel filed a Request to Exclude Charge challenging the inclusion of costs or revenues for Ameren Missouri's participation in the SPP marketplace in its Fuel Adjustment Clause (FAC) as they were included in violation of Ameren Missouri's tariff.¹ Public Counsel noted that Ameren Missouri failed to meet any of the three requirements for sufficient notice of the SPP marketplace charge type and did not meet the requirements for the inclusion of this additional cost or revenue.²

2. The request was made because, due to the lack of information regarding the inclusion of the SPP marketplace charge type described in Ameren Missouri's FAC monthly submissions, Public Counsel was not able to determine whether or not any of these costs or revenues had been included in Ameren Missouri's FAC.

3. On January 5, 2015, Ameren Missouri filed its Response to Public Counsel's Request stating:

In summary, there has been no notice of an additional charge type arising from the SPP marketplace, as contemplated by the FAC tariff, and neither the current

¹ Electronic Filing Information System (EFIS), Item No. 7.

² Id.

FAR rate filed in this docket nor prior FAR rates that are or were in effect include any such SPP charges or revenues.³

4. Also on January 5, 2015, the Staff of the Missouri Public Service Commission (Staff) filed its Response which stated that Staff found no evidence in the monthly reports that Ameren Missouri has been flowing SPP marketplace costs or revenues through its FAC.⁴

5. Given Ameren Missouri and Staff's responses in this case that no costs or revenues associated with the SPP marketplace have been included in Ameren Missouri's FAC, Public Counsel withdraws its request to have the charge type excluded at this time.

6. However, Public Counsel notes that the purpose of information required in the submission of the monthly report is to provide transparency regarding the addition of costs or revenues to Ameren Missouri's FAC.

7. Therefore, to achieve the transparency envisioned by the tariff regarding new charge/revenue types, Public Counsel asks that the charge-type description of the SPP marketplace be removed from the monthly FAC reports and not appear until Ameren Missouri can provide the information required by the Commission's tariff sheets regarding the inclusion of a new charge/revenue type.

³ EFIS, Item No. 10.

⁴ EFIS, Item No. 9.

WHEREFORE, Public Counsel respectfully submits its response.

Respectfully submitted,

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By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 12th day of January 2015:

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