

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri Containing Its Annual) **File No. ER-2015-0130**
Fuel Adjustment Clause Mechanism.)

**STAFF RECOMMENDATION TO APPROVE TRUE-UP FILING FOR AMEREN
MISSOURI'S FUEL ADJUSTMENT CLAUSE FOR THE 14TH RECOVERY PERIOD**

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

1. On November 21, 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 the provisions of its FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

2. The true-up amount and interest amount for the 14th Recovery Period identified in this case are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount in the Company’s 17th Accumulation Period Fuel Adjustment Rates (“FAR”) filing in File No. ER-2015-0128, also filed on November 21.

3. On November 24, the Commission ordered Staff to file a recommendation regarding its examination and analysis of the true-up filing by no later than December 21, 2014, 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 14th 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 amount and interest amount for the 14th Recovery Period (the billing months February 2014 through September 2014) are correct. The 14th Recovery Period's under-collected amount of \$332,915¹ and interest amount of \$(856,898) are included in Ameren Missouri's calculation of its requested current period FARs in File No. ER-2015-0128, also filed November 21, 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-2015-0128 noted above.

¹ This amount includes accumulated interest as specified on 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 filing. Any true-up adjustments shall be reflected in T above. Interest on the true-up adjustment will be included in I 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 14th Recovery Period, under the provisions of the Company's FAC tariff sheets and Commission Rules 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

Respectfully Submitted,

/s/ Marcella L. Mueth

Marcella L. Mueth
Assistant Staff Counsel
Missouri Bar No. 66098

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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 19th day of December, 2014.

/s/ Marcella L. Mueth

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2015-0130
Union Electric Company d/b/a Ameren Missouri

FROM: Matthew J. Barnes, Utility Regulatory Auditor IV
David Roos, Regulatory Economist III
Curtis Gateley, Utility Policy Analyst II

DATE: /s/ John Rogers 12/19/2014 /s/ Marcella L. Mueth 12/19/2014
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 Fourteenth Fuel Adjustment Clause True-up Filing Under the Provisions of 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

DATE: December 19, 2014

On November 21, 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 fourteenth true-up filing under the provisions of its Fuel Adjustment Clause ("FAC") tariff sheets, 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount without interest of \$332,915 identified in this filing is the result of an under-collection during Recovery Period 14 ("RP14") that includes the billing months of February 2014 through September 2014. RP14 is the recovery period for and following Accumulation Period 14 ("AP14") that includes the period of June 1, 2013 through September 30, 2013. On page 4, lines 1 through 8, of his direct testimony, Company Witness Erik C. Wenberg states the following:

There was an under-recovery of \$332,915 from customers during the Recovery Period due to the difference between actual and estimated KWh sales described earlier and recalculations using the S105 data. After applying the interest to be recovered for the Accumulation Period of \$159,154, as well as the interest to be refunded with the prudence adjustment included in the Accumulation Period of \$1,016,052, each of which was calculated using the Company's short-term borrowing rate as provided for in the FAC tariff and the Commission's FAC rules, there was a total over-recovery from customers of \$523,983.

The true-up amount¹ without interest for RP14 of \$332,915 and the interest amount for RP14 of \$(856,898) are included in the calculation of the Fuel and Purchased Power Adjustment (“FPA”) amount for the Company’s Accumulation Period 17 (“AP17”) adjustment filing, also filed on November 21, 2014, in File No. ER-2015-0128, in compliance with Ameren Missouri’s FAC.²

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 RP14 true-up filing for the billing months February 2014 through September 2014 during which Ameren Missouri under-collected \$332,915 from its customers for inclusion in the calculation of the FPA amount included in the Company’s AP17 adjustment filing in File No. ER-2015-0128.

Staff has verified that Ameren Missouri has filed its 2013 annual report³ 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.

¹ See Page 1 of 5 of Schedule EW-TU of the direct testimony of Erik C. Wenberg for calculation of the RP14 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.”

³ Ameren Missouri is expected to file its 2014 Annual Report by the end of the first quarter 2015.

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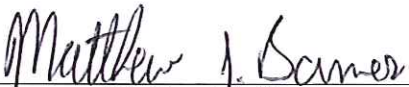
In the Matter of the True-up of Union)
Electric Company d/b/a Ameren)
Missouri's Fuel Adjustment Clause for the)
14th Recovery Period)

File No. ER-2015-0130

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 19th day of December, 2014.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086



Notary Public

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Electric Company d/b/a Ameren)
Missouri's Fuel Adjustment Clause for the)
14th Recovery Period)
File No. ER-2015-0130

AFFIDAVIT OF CURTIS B. GATELEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Curtis B. Gateley, 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.



Curtis B. Gateley

Subscribed and sworn to before me this 19th day of December, 2014.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
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Notary Public

