

**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)	<u>File No. ER-2014-0022</u>
Clause for the 13 th Accumulation Period)	<u>Tariff No. JE-2014-0042</u>

**APPLICATION FOR REHEARING OR RECONSIDERATION
OF THE CONSUMERS COUNCIL OF MISSOURI**

COMES NOW the Consumers Council of Missouri ("Consumers Council"), pursuant to Section 386.500 RSMo. and 4 CSR 240-2.160, and respectfully applies for a rehearing and/or reconsideration of the Missouri Public Service Commission's ("Commission's") Order Regarding Fuel Adjustment Clause Tariff, issued in the above-styled matter on September 4, 2013, and bearing an effective date of September 24, 2013 ("Order").

This Report and Order is unjust and unreasonable, unsupported by competent and substantial evidence on the whole record, and lacks sufficient findings of fact and conclusions of law, in that the Order does not address the issue of whether Ameren Missouri consumers deserve to be credited in the utility's approved FAC tariff for a \$26.343 million refund that has is required by the Commission's July 31, 2013 Order, in order to correct an imprudence in Ameren Missouri's calculation of prior FAC charges. For years, consumers have been denied credit for this imprudence on behalf of the utility. No rationale whatsoever was given in the Order for why consumers should be forced to wait even longer to be credited with this refund that they deserve. The amount

of this necessary prudence adjustment has been calculated, and no party has offered up any reason why the adjustment, which would operate in the consumer's favor, should be delayed to a future period.

Even under the FAC process, which is a privilege (not a right) granted by the Commission to Ameren Missouri, the Commission is obligated to fairly balance the interests of shareholders and ratepayers. As such, Consumers Council contends that it is unreasonable for *upward adjustments* that the utility claims under the FAC process to be given more expeditious treatment by the Commission than significant and known *downward adjustments* are given when calculating electric utility rates.

WHEREFORE, the Consumers Council respectfully requests a rehearing and/or reconsideration of the Commission's September 4, 2013 Order in this matter, making the imprudence refund adjustment, upon which the Commission has already ruled, to proposed Tariff No. JE-2014-0042.

Respectfully submitted,

A handwritten signature in blue ink that reads "John B. Coffman". The signature is written in a cursive style and is positioned above a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties of record on the 13th day of September, 2013.


