

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

In the Matter of an Earnings Investigation of the)
Retail Natural Gas Utility Operated by the)
Union Electric Company, doing business as)
Ameren Missouri)

Case No. GO-2016-

**Staff's Motion to
Open An Earnings Investigation**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Open An Earnings Investigation*, states as follows:

Introduction:

1. This earnings investigation concerns the sufficiency of the rates for natural gas service charged by the Union Electric Company, doing business as Ameren Missouri.

Parties:

2. Movant is the Staff of the Missouri Public Service Commission, acting through the Chief Staff Counsel as authorized by Commission Rule 4 CSR 240-2.070(1).

3. Respondent is the Union Electric Company, doing business as Ameren Missouri (Ameren Missouri). Respondent is a Missouri general business corporation in good standing and a wholly-owned subsidiary of Ameren Corporation, a publicly-traded utility holding company. Pursuant to the Missouri Secretary of State's website, Ameren Missouri's principal place of business is One Ameren Plaza, 1901 Chouteau, St. Louis, Missouri 63103. Ameren Missouri's registered agent is CT Corporation System, 120 South Central Avenue, Clayton, Missouri 63105.

Jurisdiction:

4. Respondent is engaged in the business of owning and operating gas plant, including real estate, fixtures and personal property, for the purpose of distributing and selling natural gas to the public for light, heat and power, pursuant to privileges, licenses and franchises granted by the State of Missouri and by various municipalities and political subdivisions thereof. Respondent is thus a gas corporation and a public utility within the intendments of § 386.020, (18) and (43), RSMo., subject to the jurisdiction of this Commission. Section 386.250, RSMo.

5. The Commission is charged with the general supervision of all gas corporations. Sections 386.250(1) and 393.140(1), RSMo. The Commission is authorized to investigate the methods employed by gas corporations, § 393.140(2), RSMo., to examine persons and corporations under its supervision, § 393.140(5), RSMo., to examine the accounts, books, contracts, records, and other papers of gas corporations, § 393.140(8), RSMo., and may require gas corporations to answer specific questions and file reports. Section 393.140(9), RSMo. Should the Commission determine, after hearing, that a gas corporation's rates and charges are unjust, unreasonable, unjustly discriminatory or unduly preferential or in any way in violation of any provision of law, the Commission shall determine and prescribe the just and reasonable rates and charges thereafter to be in force for the service to be furnished. Section 393.140(5), RSMo.

Background:

6. Ameren Missouri's most recent general rate case was Case No. GR-2010-0363, which was resolved more than five years ago by a

Unanimous Stipulation and Agreement that provided for a revenue requirement increase of \$9.0 million and which was implemented into rates effective on February 20, 2011. The Company had originally sought an increase of \$11.9 million.

7. Ameren Missouri's most recent Infrastructure System Replacement Surcharge ("ISRS") tariff, approved for service on and after October 18, 2013, in Case No. GO-2014-0015, will expire on October 18, 2016. In that case, the Commission approved ISRS rates designed to collect revenues in the amount of \$1,266,546. In Case No. GO-2015-0274, Ameren Missouri's reconciliation filing indicated that the Company under-collected \$67,507 during the period October 2013 to October 2014. On July 16, 2015, the Commission approved new ISRS rates for Ameren Missouri designed to make up the deficiency.

Purpose of the Investigation:

8. Since over five years has elapsed since the effective date of Ameren Missouri's last general rate case, Staff states that it would be prudent to conduct an earnings review of Ameren Missouri's rates for natural gas service to determine if these existing rates are just and reasonable. For that reason, Staff proposes this earnings investigation in order to determine whether Ameren Missouri's rates for natural gas service are just and reasonable.

WHEREFORE, Staff prays that the Commission will open an earnings investigation as described in this motion; and grant such other and further relief as is just in the circumstances.

Respectfully Submitted,

/s/ Kevin A. Thompson

Kevin A. Thompson
Chief Staff Counsel
Missouri Bar No. 36288

P.O. Box 360
Jefferson City, MO 65102
573-751-6514 (telephone)
573-526-6969 (facsimile)
kevin.thompson@psc.mo.gov (e-mail)

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 30th day of June, 2016, on the Public Counsel and on counsel for Ameren Missouri.

/s/ Kevin A. Thompson