

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2013-0311
Union Electric Company d/b/a Ameren Missouri

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

DATE: /s/ John A. Rogers 12/26/2012 /s/ John Borgmeyer 12/26/2012
Energy Unit / Date Staff Counsel's Office / Date

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

DATE: December 26, 2012

On November 26, 2012, 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 eighth true-up filing under the provisions in 4 CSR 240-3.161(8) and 4 CSR 240-20.090(5).

The true-up amount of \$1,327,563 identified in this filing is the result of an under-collection during Recovery Period 8 ("RP8") that includes the billing months of February 2012 through September 2012.¹ RP8 is the recovery period for and following Accumulation Period 8 ("AP8") that includes the period of June 1, 2011 through September 30, 2011.

The \$1,327,563 true-up amount for RP8 is included in the calculation of the Recovery Period Fuel and Purchased Power Adjustment ("FPA_{RP}") per kWh rate included in the Company's Accumulation Period 11 ("AP11") adjustment filing, also filed on November 26, 2012, in File No. ER-2013-0310, 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

¹ RP8 is 8 months long as provided for in the modified FAC effective July 31, 2011, as a result of Case No. ER-2011-0028.

² Union Electric Company's Schedule No. 5, Original Sheet No. 98.20: "TRUE-UP OF FAC: After completion of each Recovery Period, the Company will make a true-up filing in conjunction with an adjustment to its FAC. The true-up filing shall be made on the same day as the filing made to adjust its FAC. Any true-up adjustments or refunds shall be reflected in item R above, and shall include interest related as provided for in item I above."

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 RP8 true-up filing for the billing months February 2012 through September 2012 during which Ameren Missouri under-collected \$1,327,563 with interest from its customers for inclusion in the calculation of the FPA_{RP} per kWh rate included in the Company's AP11 adjustment filing in File No. ER-2013-0310.

Staff has verified that Ameren Missouri has filed its 2011 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.