BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Tariff Filings of Union)	
Electric Company, d/b/a Ameren Missouri, to)	Case No. ER-2014-0258
Increase Its Revenues for Retail Electric Service.)	

STAFF'S REPLY TO AMEREN MISSOURI'S RESPONSE TO STAFF'S RECOMMENDATION TO REJECT TARIFFS

COMES NOW the Staff of the Missouri Public Service Commission and for its Reply to Ameren Missouri's Response to Staff's Recommendation states as follows:

- 1. On May 6, 2015, Ameren Missouri filed its compliance tariffs purportedly to conform to the decisions contained within the Missouri Public Service Commission's ("Commission") *Report and Order* in this case.
- 2. On May 7, 2015, Staff filed a recommendation to reject the compliance sheets, but cited a substantive objection to only one of them Sheet No. 62.5.
- 3. On May 11, 2015, the Commission issued an order requiring Ameren Missouri to respond to Staff's recommendation no later than 1:00 pm on May 12, 2015. Ameren Missouri did so.
- 4. Sheet No. 62.5 is the rate schedule for the Industrial Aluminum Smelter ("IAS") service classification created by the *Report and Order*. Staff's substantive objection relates to whether the IAS rate should be seasonally differentiated, as contended by the Company, or whether it should be a flat rate, which is what the Staff understands the Commission intends. Staff does not believe that the Commission's use of the word "effective" was intended to signal a seasonally differentiated rate design for the IAS Class. Staff believes that the Commission intended a flat rate design for the IAS Class, \$36.00 per MWh.

5. Ameren Missouri admits that, if Sheet No. 62.5 were rejected because the Commission decided it should not be seasonally differentiated, and that if Ameren Missouri then failed to file a Sheet No. 62.5 with a flat rate, that it would then over-collect its revenue requirement.

6. Staff does not agree that the seasonally-differentiated rates proposed by Ameren Missouri are reasonably designed in respect to the magnitude of a reasonable differential for an energy-only rate.

WHEREFORE, Staff urges the Commission to reject the Compliance Tariffs previously filed herein and to require Ameren Missouri forthwith to file a revised IAS Rate Sheet with a flat rate design.

Respectfully submitted,

/s/ Kevin A. Thompson

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

Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 Tel. 573-751-6514 Fax 673-526-6969 Kevin.thompson@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 13th day of May, 2015, to counsel for all parties on the Commission's service list in this case.

/s/ Kevin A. Thompson