

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

In the Matter of the Fourth True-Up Filing Under)
the Commission-Approved Fuel Adjustment)
Clause of Union Electric Company d/b/a Ameren)
Missouri.)

File No. ER-2012-0165

STAFF RECOMMENDATION

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

1. This is the fourth fuel adjustment clause true-up filing by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”).

2. In the attached Memorandum (Appendix A), based on its examination and analysis of information filed by Ameren Missouri, the Missouri Public Service Commission’s (“Commission”) *Report and Order* in File No. ER-2010-0274 and the stipulation between Staff and Ameren Missouri in File No. ER-2010-0274, Staff recommends the Commission approve Ameren Missouri’s true-up filing for Recovery Period 4 (billing months October 2010 through September 2011) period during which Ameren Missouri under-collected \$3,854,238 from its customers.

3. This \$3,854,238, plus interest, is included in the Ameren Missouri’s Recovery Period 8 (“RP8”)¹ FPA per kWh rates adjustment filing docketed as File No. ER-2012-0164.

4. Staff has verified that Ameren Missouri has filed its 2010 annual report and verified that Ameren Missouri is not delinquent on any assessment. Other than as noted in Appendix A, Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

¹ billing months February through September 2012

WHEREFORE, Staff recommends the Commission approve Ameren Missouri's true-up filing for Recovery Period 4 (billing months October 2010 through September 2011) during which Ameren Missouri under-collected \$3,854,238 plus interest from its customers.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Staff Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of December 2011.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ER-2012-0165
Union Electric Company d/b/a Ameren Missouri

FROM: David Roos, Regulatory Economist III
Leon Bender, Utility Regulatory Engineer I

DATE: /s/ John Rogers 12/23/2011 /s/ Nathan Williams 12/23/2011
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 Fourth 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 23, 2011

On November 28, 2011, 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 Jeff L. Dodd, its fourth 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 \$3,854,238 identified in this filing is the result of an under collection during Recovery Period 4 ("RP4") that includes the billing months October 2010 through September 2011. RP4 corresponds with Accumulation Period 4 ("AP4") that includes the period of February 1, 2010 through May 31, 2010. The true-up amount of \$3,854,238 for RP4 includes the impact of correcting the calculation of the summer and winter net base fuel cost per kWh rates ("NBFC rates") for AP4 as the Commission ordered in its June 29, 2011 *Report and Order* in File No. ER-2010-0274.¹

Ameren Missouri filed its true-up filing for RP4 on the same day it filed its Accumulation Period 8 ("AP8") fuel and purchased power adjustment ("FPA") rates adjustment filing. In his direct testimony Jeff L. Dodd indicates that the \$3,854,238 true-up amount for RP4 is included in the Recovery Period 8 ("RP8") FPA per kWh rates adjustment filing, File No. ER-2012-0164, in compliance with Ameren Missouri's FAC tariff provisions in effect for the true-up of RP4.²

¹ "Union Electric Company, d/b/a Ameren Missouri shall correct the erroneous calculation of the summer and [w]inter NBFC rates as identified in this Report and Order in all remaining true-up filings in which that erroneous calculation will have an impact."

² Union Electric Company's Schedule No. 5, 1st Revised Sheet No. 98.13: "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, where applicable. The true-up filings shall be made on the first Filing Date that occurs at least two (2) months after completion of each Recovery Period."

Union Electric Company's Schedule No. 5, Original Sheet No. 98.20: TRUE-UP OF FAC states, "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."

Staff examined the direct testimony of Jeff L. Dodd, the supporting schedules Ameren Missouri provided with its application in this case, and the monthly information Ameren Missouri has submitted to the Staff. 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 and the Stipulation of Facts³ between Staff and Ameren Missouri in File No. ER-2010-0274, Staff recommends the Commission approve Ameren Missouri's RP4 true-up filing for the billing months October 1, 2010 through September 30, 2011 during which Ameren Missouri under-collected \$3,854,238 with interest from its customers for inclusion in the Company's RP8 FPA per kWh rates adjustment filing (for billing months February 2012 through September 2012).

Staff has verified that Ameren Missouri has filed its 2010 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.

³ Joint Motion to Accept Stipulation of Facts, Further Suspend True-up Timeline, and Revise Briefing Schedule filed on March 3, 2011 in File No. ER-2010-0274 and approved by the Commission on March 10, 2011.

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

In the Matter of the True-Up of Union)
Electric Company d/b/a Ameren Missouri's)
Fuel Adjustment Clause for the 4th)
Recovery Period)

Case No. ER-2012-0165

AFFIDAVIT OF LEON C. BENDER

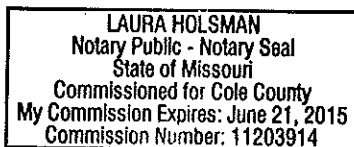
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

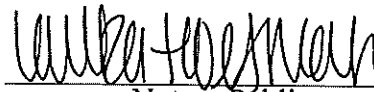
Leon C. Bender, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Leon C. Bender

Subscribed and sworn to before me this 23rd day of December, 2011.





Notary Public

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

In the Matter of the True-Up of Union)	
Electric Company d/b/a Ameren)	
Missouri's Fuel Adjustment Clause for)	Case No. ER-2012-0165
the 4th Recovery Period)	

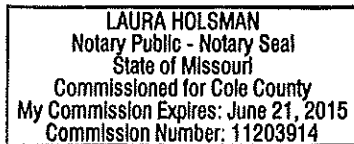
AFFIDAVIT OF MICHELLE BOCKLAGE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Michelle Bocklage of lawful age, on oath states: that she 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 her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of her knowledge and belief.


Michelle Bocklage

Subscribed and sworn to before me this 23rd day of December, 2011.





Notary Public

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

In the Matter of the True-Up of Union)	
Electric Company d/b/a Ameren Missouri's)	
Fuel Adjustment Clause for the 4th)	Case No. ER-2012-0165
Recovery Period)	

AFFIDAVIT OF DAVID C. ROOS

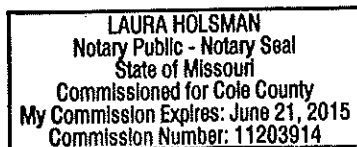
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David C. Roos, 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.



David C. Roos

Subscribed and sworn to before me this 23rd day of December, 2011.





Notary Public