

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Increase Its) **Case No. ER-2012-0166**
Revenues for Electric Service)

RECONCILIATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and states attached hereto as Appendix A is Staff's Reconciliation for this case.

WHEREFORE, Staff respectfully submits its Reconciliation.

Respectfully submitted,

/s/ Kevin A. Thompson

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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 **12th day of October, 2012**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson

**AMEREN MISSOURI ELECTRIC ER-2012-0166
RECONCILIATION - TRUE-UP / PARTIAL SETTLEMENT**

	<u>Staff</u>	<u>MIEC</u>	<u>OPC</u>
1 Ameren Missouri Revenue Requirement At True-Up	\$ 324,559,133		
2			
3 Return on Equity	\$ (87,756,040)	\$ (70,744,513)	\$ (147,378,629)
4			
5 <u>Rate Base</u>			
6 Cash Working Capital (Revenue and Expense Lags)	(6,548,006)	\$ (6,667,884)	
7 Fuel/Materials and Supplies (Inventory Declines)	(722,419)	\$ (740,109)	
8 RES Regulatory Asset	1 (657,407)		
9 Accumulated Deferred Income Tax	2 -	(8,468,415)	
10			
11 Total Rate Base	\$ (7,927,832)	\$ (15,876,408)	\$ -
12			
13 <u>REVENUES:</u> (negative represents more revenue than Company)			
14 Storm Assistance Revenues	\$ (581,189)	\$ (800,000)	
15 Total Adjustments	\$ (581,189)	\$ (800,000)	\$ -
16			
17 <u>EXPENSES:</u>			
18 Rate Case Expense	(538,000)		3 \$ (1,286,310)
19 VS 11 Severance	(8,585,082)	(8,585,082)	
20 Storm Costs	(159,488)	(500,000)	
21 Property tax	(3,190,491)	(3,190,491)	
22 2010 State Property Tax Appeal Refund	(1,450,188)	(1,450,188)	
23 Amortization of Vegetation & Inspections	(136,359)	(136,359)	
24 RES Expense	-	(4,656,595)	
25 RES Amortization	1 (1,052,121)	(2,104,242)	
26			
27 Total Adjustments	\$ (15,111,729)	\$ (20,622,957)	\$ (1,286,310)
28			
29			
30 Income Taxes - ESOP deduction	\$ (3,240,975)	\$ (3,240,975)	
31			
32 Total Differences	<u>\$ (114,617,765)</u>	<u>\$ (111,284,853)</u>	<u>\$ (148,664,939)</u>
33			
34 Staff True-Up Revenue Requirement @ High	<u>\$ 209,941,368</u>		

NOTES:

1 Reconciliation for Staff reflects three year amortization of deferred regulatory RES asset balance for inclusion in expense and no rate base inclusion for RES unamortized deferrals.

If the Commission accepts Staff's alternate proposal to allow a six year amortization of the deferred RES asset balance and inclusion of the unamortized deferral in rate base, Staff's True-Up Revenue Requirement as reflected above would be \$209,546,694, all else staying equal. Under this scenario, the reconciliation above would reflect a \$0 (Zero) difference for the RES regulatory asset balance in rate base for Staff, instead of the current (\$657,407) difference. Also, under expenses, the Staff's RES AAO amortization difference would change from the current (\$1,052,121) to (\$2,104,242) in order to reflect a six year amortization.

2 If Commission includes CWIP-ADIT as a rate base offset Staff's true-up revenue requirement will need to be reduced by approximately \$8.3 million. The adjustment for CWIP-ADIT will be impacted by the overall ROE Ordered by the Commission. Staff's calculation of \$8.3 million for CWIP-ADIT is lower than Midwest Industrial Energy Consumers ("MIEC") witness Michael L. Brosch's adjustment due to differences in ROE recommendations. Staff supports witness Michael L. Brosch's direct testimony position that it is appropriate to reduce rate base to reflect the offset associated with CWIP-related accumulated deferred income tax balances.

3 Based on Company's response to Staff Data Request No. 173, which was provided on August 29, 2012 and contained costs through April 2012.