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

)

)

)

)

)

In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage Solar Generation Facilities in O'Fallon, Missouri.

) File No. EA-2014-0136

## LIST OF ISSUES

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), The Missouri Division of Energy ("MDE") and Earth Island Institute, d/b/a Renew Missouri ("Renew Missouri")(collectively, the "Parties"), and in response to the Commission's February 26, 2014, *Order Setting Procedural Schedule*, hereby file a List of Issues. In this regard, the Parties state as follows:

This joint filing does not indicate that the Parties agree with the statement of every issue or that each issue on the following List of Issues is appropriate for Commission decision, and the Parties reserve the right to comment in their Position Statements on whether a listed issue is properly before the Commission.

- 1. Does the evidence establish that the utility solar facility for which Ameren Missouri is seeking a certificate of convenience and necessity ("CCN") is necessary or convenient for the public service?
- 2. If the Commission decides to grant the CCN, what conditions, if any, should the Commission impose?

WHEREFORE, the Parties make this filing in accordance with the Commission's February 26, 2014, *Order Setting Procedural Schedule*.

Respectfully Submitted,

*Is/ Wendy K. Tatro* **Wendy K. Tatro**, #60261 Corporate Counsel Thomas M. Byrne, #33340 Director & Assistant General Counsel 1901 Chouteau Avenue, MC 1310 P.O. Box 66149 St. Louis, MO 63166-6149 (314) 554-3484 (phone) (314) 554-4014 (facsimile) amerenmoservice@ameren.com **ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI** 

/s/Jennifer Hernandez

Jennifer Hernandez, Missouri Bar No. 59814 Senior Staff Counsel Akayla J. Jones, Missouri Bar No. 64941 Assistant Staff Counsel Attorneys for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751- 8706 (Telephone) (573) 751-9285 (Fax) jennifer.hernandez@psc.mo.gov

<u>/s/ Jeremy Knee</u> Jeremy Knee, MBE # 64644 Associate General Counsel Department of Economic Development P.O. Box 1157 Jefferson City, Missouri 65102 573-522-3304 573-526-7700 (Fax) jeremy.knee@ded.mo.gov Attorney for Missouri Division of Energy Edward F. Downey Bryan Cave LLP 221 Bolivar Street, Ste. 101 Jefferson City, MO 65101 Tel.: (573) 556-6622 Fax: (573) 556-7442 E-mail: efdowney@bryancave.com

### /s/ Andrew J. Linhares

Andrew J. Linhares, # 63973 Staff Attorney Renew Missouri 910 E. Broadway, Ste. 205 (314) 471-9973 (T) (314) 558-8450 (F) andrew@renewmo.org

## OFFICE OF THE PUBLIC COUNSEL

### /s/ Lewis R. Mills, Jr.

Lewis R. Mills, Jr. (#35275) Public Counsel P O Box 2230 Jefferson City, MO 65102 (573) 751-4857 (573) 751-5562 FAX lewis.mills@ded.mo.gov

# **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 1<sup>st</sup> day of April, 2014, to all parties on the Commission's service list in this case.

Is/Wendy K. Tatro