

**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	)	EA-2016-0208
Necessity Authorizing it to Offer a Pilot Distributed	)	
Solar Program and File Associated Tariff.	)	

**POSITION STATEMENT OF AMEREN MISSOURI**

In accordance with the Commission’s September 7, 2016, Fourth Order Amending Procedural Schedule, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”), hereby submits the following position statements:

**1. Do the terms contained in the *Non-Unanimous Stipulation and Agreement* (now a Joint Position Statement) present a plan meeting the requirements set forth in the CCN statute, Section 393.170 RSMo?**

Yes. Ameren Missouri has not and will not begin construction of these facilities without first having obtained the permission and approval of the Commission – which is exactly what Ameren Missouri seeks in this case – as required by Section 393.170.1.

Ameren Missouri plans to exercise any rights within a year of the granting of the CCN and it will obtain consent of the proper municipal authorities, assuming such consent is required. This satisfies Section 393.170.2.

The CCN is necessary or convenient for public service in order for Ameren Missouri to gain an understanding of the benefits and risks of installing solar at the distribution level, on customer facilities. Currently, Ameren Missouri’s experience is with utility-scale on utility-owned property. The Company will have to install more solar in the future, and determining which strategy for additional solar deployment is most efficient (or whether a combination

approach is best) is important. This is a pilot program, meaning the size and scale is limited, thus limiting the cost to customers. Given the learning benefit expected, the pilot clearly is necessary or convenient for public service, meeting Section 393.170.3.

**2. Does the evidence establish that Ameren Missouri’s proposed project as presented in the Non-Unanimous Stipulation and Agreement (now a Joint Position Statement), for which it seeks a CCN, “necessary and convenient for the public service” within the meaning of Section 393.170 RSMo?**

Yes. Please see response above.

**3. Does the evidence demonstrate the Company has provided the information required to comply with the Commission’s rules at 4 CSR 240-3.105?**

It does. Ameren Missouri has or will have presented all required information before it starts construction of any facility. Just as the Commission has done in other CCN dockets, the Company would expect the Blanket CCN to require Ameren Missouri to present the remaining information as set forth in the Joint Position. This is necessary to prevent a Catch-22. Ameren Missouri needs the Blanket CCN in order to determine which customers it can partner with on this pilot. Since it does not yet know which customers it will partner with, it cannot provide much of the information required by this regulation at this time. Granting the Blanket CCN with conditions is the way the Commission has traditionally dealt with similar situations.

**4. Does the evidence show that good cause exists to support a waiver of the Commission’s rules at 4 CSR 240-3.105?**

Referring to the explanation above, Ameren Missouri does not believe a waiver of 4 CSR 240-3.105 is needed. However, if the Commission disagrees, then the Company believes the fact

that the pilot is necessary or convenient for the public interest alone justifies the granting of a waiver.

**5. Is the Company's plan outlining treatment of the proposed facilities at the end of 25 years lawful under Section 393.190 RSMo?**

This question may not be ripe for a Commission determination as the Company is not asking for preapproval for any treatment of the assets at the end of 25 years. However, as Mr. Harding testifies in his direct testimony, page 4, at the end of the 25-year term, the customer may purchase the facility, renew the lease or have the facility removed from the property. To the extent that any of those options would require Commission approval, the Company would seek approval at that time. There is no need to seek that approval in this case.

Respectfully submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261  
Director and Assistant General Counsel  
1901 Chouteau Avenue, MC 1310  
St. Louis, Missouri 63166-6149  
(314) 554-3484 (phone)  
(314) 554-4014 (facsimile)  
amerenmoservice@ameren.com

ATTORNEY FOR UNION ELECTRIC  
COMPANY, d/b/a AMEREN MISSOURI

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing has been e-mailed, this 12th day of October, 2016, to counsel for all parties of record.

/s/ Wendy K. Tatro