Exhibit No.:

Issues: In-Service Criteria

Witness: Claire M. Eubanks Sponsoring Party: MO PSC Staff

Type of Exhibit: Surrebuttal Testimony

Case No.: ER-2014-0258

Date Testimony Prepared: February 6, 2015

MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REVIEW DIVISION

SURREBUTTAL TESTIMONY

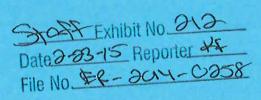
OF

CLAIRE M. EUBANKS

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. ER-2014-0258

Jefferson City, Missouri February 2015



BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

d/b/a A	Matter of Union Elec Ameren Missouri's Ta venues for Electric Ser	riff to Increase)))	Case No. ER-2014-0258
	AFFI	DAVIT OF CI	LAIRE M. I	EUBANKS
	E OF MISSOURI)) ss)		
consist that the knowle	eparation of the following of $\frac{2}{2}$ pages of answers in the following	owing Surrebutt of Surrebuttal Towing Surrebutt et forth in such	tal Testimon Festimony to al Testimon	states: that she has participated in yin question and answer form to be presented in the above case by were given by her; that she had that such matters are true to the
			<u>Cl</u>	aire M. Eubanks
Subscri	ibed and sworn to bef	fore me this <u>4</u>	day of Fe	ebruary, 2015.
	SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway Co My Commission Expires: October 28 Commission Number: 149420	ounty 3, 2018	Du	Notary Public

1	SURREBUTTAL TESTIMONY				
2 3	\mathbf{OF}				
4 5 6	CLAIRE M. EUBANKS				
7 8	UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI				
9 10 11	CASE NO. ER-2014-0258				
12	Q. What are your name and business address?				
13	A. Claire M. Eubanks, P.O. Box 360, Jefferson City, Missouri, 65102.				
14	Q. Are you the same Claire M. Eubanks who contributed to Staff's Cost of				
15	Service Report filed in this case?				
16	A. Yes, I am.				
17	Q. What is the purpose of your surrebuttal testimony?				
18	A. The purpose of my surrebuttal testimony is to discuss the in-service evaluation				
19	of the O'Fallon Renewable Energy Center. At the time direct testimony was filed in this case,				
20	the O'Fallon Renewable Energy Center in-service evaluation was not complete. Subsequent				
21	to the filing of direct testimony, the O'Fallon Renewable Energy Center has satisfactorily met				
22	the in-service criteria and should be considered "fully operational and used for service."				
23	PROJECT DESCRIPTION				
24	Q. Please describe the project designated as the O'Fallon Renewable Energy				
25	Center.				
26	A. O'Fallon Renewable Energy Center, a 5.7 megawatt ("MW") direct current				
27	("DC") utility-scale solar facility, is located in O'Fallon, Missouri, adjacent to the existing				
28	Belleau substation. The facility consists of approximately 19,000 solar panels and three				
29	inverters.				
	·				

Q.

1

Have you personally visited the facility being considered in this testimony?

Solar Electrical Generator

In-Service Test Criteria

O'Fallon Renewable Energy Center

1. All major construction work is complete.

Based on personal observations of the facility on December 12, 2014, all major construction work is complete.

2. All preoperational tests have been successfully completed.

Based on review of the Draker Commissioning Report and Invertor Commission Checklists for all three inverters, preoperational tests have been successfully completed.

3. Facility successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.

Applicable operational contract guarantees have been satisfied.

4. Upon observation of the facility for 72 consecutive hours the facility will have demonstrated that when sunlight was shining on it during that period it produced power in a standard operating mode.

Based on data obtained from November 9, 2014 through November 11, 2014, the unit produced power when sunlight was shining on it.

5. Facility shall meet at least 95% of the guaranteed capacity (4.5 MW AC) based on the Capacity Test as outlined in the contract or amended contract. The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions.

Based on data obtained from 9:00 AM, November 9, 2014 through, 6:30 PM November 16, 2014, the facility met at least 95% of the guaranteed capacity based on the Capacity Test.

- 6. Sufficient transmission/distribution interconnection facilities shall exist for the total plant design net electrical capacity at the time the facility is declared fully operational and used for service.
 - Based on review of the Belleau Solar Photovoltaic (PV) Project Interconnection study, data, drawings, and other information related to the interconnection of the generating units to the distribution system, there is sufficient interconnection capacity.
- 7. Sufficient transmission/distribution facilities shall exist for the total plant design net electrical capacity into the utility service territory at the time the facility is declared fully operational and used for service.
 - Based on review of the Belleau Solar Photovoltaic (PV) Project Interconnection study, data, drawings, and other information related to the distribution facilities connecting to the utility service territory, there is sufficient interconnection capacity.