Exhibit No.:Issues:Solar Load AdjustmentWitness:Michael L. StahlmanSponsoring Party:MO PSC StaffType of Exhibit:Surrebuttal TestimonyCase No.:ER-2014-0258Date Testimony Prepared:February 6, 2015

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

SURREBUTTAL TESTIMONY

OF

MICHAEL L. STAHLMAN

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

In the Matter of Union Electric Company) d/b/a Ameren Missouri's Tariff to Increase) Its Revenues for Electric Service)

Case No. ER-2014-0258

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)) ss **COUNTY OF COLE**)

Michael L. Stahlman, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of λ pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

RZR

Michael L. Stahlman

Subscribed and sworn to before me this 4^{++-} day of February, 2015.

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 28, 2018 Commission Number: 14942086

Swan Kundermen Notary Public

SURREBUTTAL TESTIMONY
OF
MICHAEL L. STAHLMAN
UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI
CASE NO. ER-2014-0258
Q. Please state your name and business address.
A. My name is Michael L. Stahlman, and my business address is Missouri Public
Service Commission, P.O. Box 360, Jefferson City, Missouri, 65102.
Q. Are you the same Michael L. Stahlman that supported sections in Staff's
Revenue Requirement Cost of Service Report, Staff's Rate Design and Class Cost-of-Service
Report, and rebuttal testimony in this case?
A. Yes.
Q. What is the purpose of your testimony?
A. I will discuss the Ameren Missouri's change in capacity factor for the
proposed adjustment of load for solar installations as discussed in the Rebuttal Testimony of
Steven M. Wills.
Solar Load Adjustment
Q. What does Ameren Missouri propose to change in the calculation of the solar
load adjustment?
A. Ameren Missouri proposes to increase the solar capacity factor used due to ar
update by the National Renewable Energy Laboratory's ("NREL") solar generation calculator
called PVWatts released in September 2014.
Q. Does Staff support this change?

Surrebuttal Testimony of Michael L. Stahlman

A. Not at this time. Since the actual energy generated by the solar panels in
question is unavailable, Staff's approach in calculating the solar load adjustment is to keep the
adjustment consistent with Ameren Missouri's calculation of Solar Renewable Energy Credits
("SRECs"). In response to Staff Data Request 0366.1, Ameren Missouri stated that a capacity
factor of 14.4%, which is the older capacity factor, was used to calculate all SRECs for the
solar panels installed during the test year. Staff would be amenable to the updated capacity
factor if it was also used to calculate the amount of SRECs for these solar panel installations.

8 Q. Are there other differences between Staff's and Ameren Missouri's9 calculation?

A. Yes. Staff continues to support the adjustments made in its Staff's Revenue
Requirement Cost of Service Report which differ from Ameren Missouri's calculation in
three ways: the capacity factor, sales in excess of a customer's demand, and adjusting for
large classes. In rebuttal, Ameren Missouri updated the time period used for calculating the
solar load adjustment which resolves the main difference between Ameren Missouri's and
Staff's initial calculations.

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Q. Does this conclude your surrebuttal testimony?

A. Yes it does.