

2. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to the undersigned counsel and to:

Tom Byrne
Senior Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue
St. Louis, MO 63103
314-554-2514 (phone)
tbyrne@ameren.com

3. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

4. Ameren Missouri has no overdue annual report or assessment fees.

II. REQUEST FOR CCN

5. The Company requests a blanket CCN in order to construct, own, operate and maintain various small solar generation facilities at different locations within Ameren Missouri's service territory as part of a pilot program to be known as the Solar Partnership Pilot.

6. As part of this pilot program, Ameren Missouri intends to construct multiple solar generation facilities with the goal of improving the Company's understanding of how distributed generation, like small-scale solar generation, can impact (challenges and benefits) its distribution system as well as gauging customer willingness to participate and share the costs of small-scale renewable energy facilities.

7. While the facilities that are the subject of this Application will not be constructed solely for the purpose of complying with Missouri's Renewable Energy Standard ("RES"), the renewable energy credits ("RECs") generated from the facilities will be used to comply with the RES.

8. As is explained in the Direct Testimony of William Barbieri, filed with this Application, Applicant has a history of increasing its investment in and support of solar generation. Ameren Missouri has paid rebates to customers who install solar facilities on their homes and businesses since 2010, totaling approximately \$100 million. In 2011, Ameren Missouri established a solar learning center in its offices, where it has tested various types of solar power generation and made that information available to the public through its website at Ameren.com. Most recently, in 2014, Ameren Missouri constructed its first utility scale solar generation facility (consisting of over 19,000 solar panels with a capacity of 5.7 megawatts [“MW”]) in O’Fallon, Missouri and has plans to construct an even larger solar facility in Montgomery County, Missouri. However, Ameren Missouri has little experience with the installation and operation of smaller-scale, distributed generation and has no experience with generation sited on customer property.

9. This pilot is another step in Ameren Missouri's investment in solar generation in the state of Missouri. Customers have asked Ameren Missouri for the ability to partner in the installation of solar generation. This pilot is designed to see if the interest voiced by customers can be translated into a willingness to share the costs of investment in these generation facilities and also has the added benefit of providing an opportunity to explore the benefits of distributed generation and customer participation in that process. The pilot will facilitate continued development of solar generation, which is expected to play an increasing role in energy production in the future as its costs of solar generation continue to fall.

10. The Solar Partnership Pilot satisfies the *Tartan* criteria typically used by the Commission in evaluating CCN applications. The pilot program is needed for the reasons discussed above, and also elaborated on in Mr. Barbieri’s Direct Testimony; namely Ameren

Missouri's need to learn more about this evolving technology and how these installations affect the Company, customers and the operation of the system. In addition, the pilot program will provide the opportunity for customers interested in housing these facilities to do so, while also learning about how these installations affect the Company, customers and the operation of the Company's system. Ameren Missouri has a long track record of expertise in constructing, installing and operating generating facilities, whether they be as small as these distributed generation units or as large as a baseload generating plant. Consequently, Ameren Missouri is qualified to construct, operate and maintain the facilities.

The relatively small investment (up to \$10 million) is well within the Company's financial capability, given the size of its rate base, its "normal" capital expenditures and its more than \$3.3 billion in annual revenues. For similar reasons, the project is economically feasible. The investment and the associated operating expenses will be included in the ratemaking process and the benefits of the project will be well worth its costs.

Finally, given that the other four *Tartan* criteria are satisfied, the project is also in the public interest.

11. For this pilot, Ameren Missouri has committed up to \$10 million dollars. The goal is to install approximately 5 MWs of installed solar generation capacity. As stated above, these installations are intended to be small, distributed generation systems, and so there will be requirements applicable to each project funded under this pilot program. The installations must tie into Ameren Missouri's distribution system and the size of the facilities will be limited to no more than 2 MWs and no less than 100 kilowatts-DC ("kW_s"). In addition, each facility must be projected to have a capacity factor of at least 14%. For each facility, the maximum Ameren Missouri will invest is \$2.45 per watt-DC and the participating customer will be responsible for

making a contribution in aid of construction for costs over and above that amount. Ameren Missouri anticipates these solar facilities will be located primarily on parking garages or open areas owned by its commercial customers, although specific locations have yet to be determined.

12. As far as Ameren Missouri is aware, this program is unique in the state of Missouri. This pilot truly is a test. Although the Company has received indications of interest in this type of program, it does not yet know which customers will participate in this program.

13. Because Ameren Missouri does not have exact locations at which these solar facilities will be sited, it will provide that information in this docket as each project is identified and finalized and before construction begins as allowed by 4 CSR 240-3.105(2).

14. Similarly, as the Company does not yet know the exact locations where these facilities will be sited, construction plans have not yet been finalized. Pursuant to 4 CSR 240-3.105(2), Ameren Missouri will submit plans in this docket for qualifying projects after each location is identified and finalized and before construction begins.

15. Depending upon the requirements at each selected site, Applicant will request all of the permits and approvals required for the construction of each facility. Ameren Missouri will file copies of all permits received for each project in this docket, again, as allowed by 4 CSR 240-3.105(2).

16. Without specific locations having been identified, Ameren Missouri cannot know if any facilities to be installed will need to connect with its distribution system by crossing any electric or telephone lines, railroad tracks or underground facilities. Again, Ameren Missouri will provide this information in this docket as each project is identified and finalized and before construction begins, as allowed by 4 CSR 240-3.105(2).

17. The foregoing facts and contemporaneously filed testimony demonstrate that issuance of a CCN authorizing Ameren Missouri to construct, own, operate and maintain distributed generation facilities through this pilot program is required by the public convenience and necessity. Applicant requests the Commission approve this CCN, with the authority to begin construction on each individual project subject only to Ameren Missouri providing the required information, as applicable and as listed above.

18. On February 19, 2016, Ameren Missouri filed a 60-day notice for this Application, as required by 4 CSR 240-4.020(2), and 60 days have elapsed since that filing. In the 60-day notice, Ameren Missouri indicated that it would be filing a tariff along with this CCN request. Since that filing, the Company has decided that it does not need to file a tariff in order to site this generation, believing that only a CCN is required.

WHEREFORE, Ameren Missouri respectfully requests that the Commission enter an order granting its request for a blanket certificate of public convenience and necessity, with the authority to begin construction on each individual project subject only to the Company providing the above-described information, as applicable to an individual project, so that Ameren Missouri may implement the Solar Partnership Pilot and construct, own, operate and maintain various distribution level solar generation facilities qualifying for the pilot within its service territory.

Respectfully submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro #60261

Director and Assistant General Counsel

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the public version of the foregoing Application has been e-mailed, this 27th day of April, 2016, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

/s/ Wendy K. Tatro
Wendy K. Tatro

VERIFICATION

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

WILLIAM J. BARBIERI, being duly sworn on oath, deposes and says that he is the Director, Renewable Strategy, Policy and Generation of Union Electric Company d/b/a Ameren Missouri, that he has read the foregoing Application, knows the contents thereof, and that the information contained in that application is true and correct to the best of his knowledge and belief, and that he has proper authority to verify the Application.

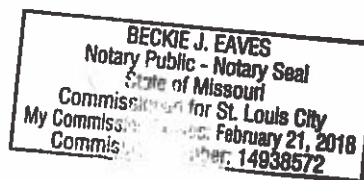
UNION ELECTRIC CO. d/b/a AMEREN MISSOURI

BY: *William J. Barbieri*
WILLIAM J. BARBIERI

Subscribed and sworn to before me, the undersigned Notary Public in and for the county and state aforesaid, on the 26th day of April, 2016.

Becki J. Eaves
Notary Public

My Commission expires: 2-21-18



STATE OF MISSOURI



Jason Kander
Secretary of State

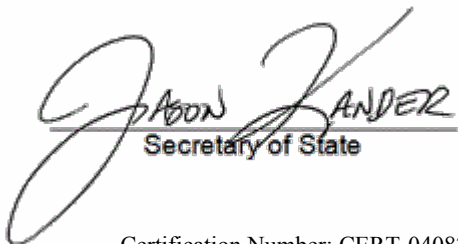
CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

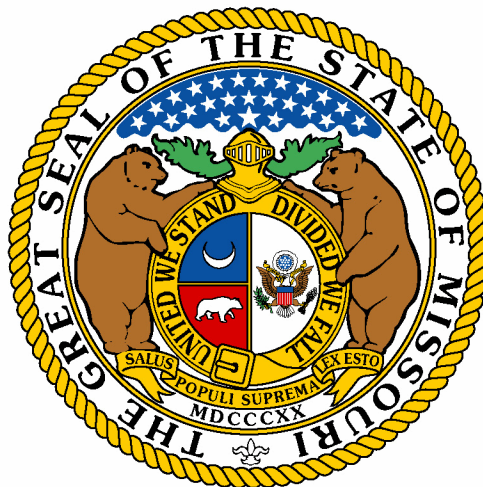
I, JASON KANDER, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

UNION ELECTRIC COMPANY
00040441

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 8th day of April, 2016.


Secretary of State



Certification Number: CERT-04082016-0092