

FILED⁵

OCT 31 2016

Missouri Public
Service Commission

Exhibit No.:

101

Issue:

Certificate of Convenience

Witness:

Claire M. Eubanks, P.E.

Sponsoring Party:

MoPSC Staff

Type of Exhibit:

Surrebuttal Testimony

Case No.:

EA-2016-0208

Date Testimony Prepared:

September 30, 2016

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENGINEERING ANALYSIS

SURREBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, P.E.

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. EA-2016-0208

*Jefferson City, Missouri
September 2016*

Staff Exhibit No. 102
Date 10-17-16 Reporter XF
File No. EA-2016-0208

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1 A. Staff is sensitive to Walmart and Brightergy's concern that participating
2 customers may not receive a tangible benefit which may limit the interest in the program.
3 However, Ameren has represented in its Direct Testimony they have been contacted by
4 customers who are interested in this type of arrangement. Whether or not there is broad
5 customer interest in supporting solar projects without lease agreements is one question the
6 structure of this program may be able to answer. Further, including lease agreements in the
7 Solar Partnership Pilot would increase costs, particularly if the \$2.20/Watt-DC per site limit
8 was not lowered accordingly or if the lease agreements were not included under the
9 \$2.20/Watt-DC per site limit.

10 Q, Walmart's witness Mr. Chriss is concerned about "the public policy
11 implications of the potential expectation that customers give away the use of their property in
12 order to contribute to renewable development in Missouri." What is your response to
13 Mr. Chriss' concern?

14 A. Staff recognizes this program does not necessarily fit every commercial and
15 industrial customer of Ameren's. From Staff's perspective, this program is aimed at
16 customers with property that has little opportunity cost who are interested in promoting
17 renewables in Missouri. Staff also views this pilot as a potential stepping stone for additional
18 solar partnership programs in the future which may be structured to target other subsets of
19 Ameren's customers or a broader set of Ameren's customers.

20 Q. Mr. Chriss discusses the lack of lease payments in regards to a customer costs
21 to operate and maintain their property. Are there instances that a solar facility would benefit
22 certain customers in regards to operation and maintenance of their property?

Surrebuttal Testimony of
Claire M. Eubanks, PE

1 A. Yes. Staff understands that Ameren would maintain the solar facility,
2 therefore a customer who has property with little opportunity cost yet costs to maintain, such
3 as, mowing, may see the partnership as a benefit in reducing their operational and
4 maintenance costs.

5 Q. Does this conclude your surrebuttal testimony?

6 A. Yes, it does.

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)	Case No. EA-2016-0208
Permission and Approval and a Certificate of)	
Public Convenience and Necessity)	
Authorizing it to Offer a Pilot Distributed)	
Solar Program and File Associated Tariff)	

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

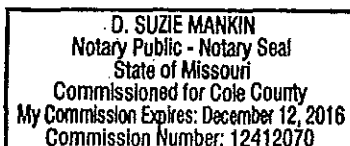
COMES NOW CLAIRE M. EUBANKS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Surebuttal Testimony and that the same is true and correct according to her best knowledge and belief.

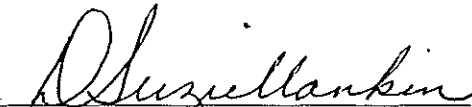
Further the Affiant sayeth not.


CLAIRE M. EUBANKS, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30th day of September, 2016.




Notary Public