

**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 of a Certificate of Public Convenience and)	<u>File No. EA-2016-0208</u>
Necessity Authorizing it to Offer a Pilot Distributed)	
Solar Program and File Associated Tariff)	

**STAFF’S REPORT REGARDING
AMEREN MISSOURI’S DOCUMENT SUBMISSION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and states for its *Staff’s Report Regarding Ameren Missouri’s Document Submission* (Report) as follows:

1. On December 21, 2016, the Missouri Public Service Commission issued its *Report and Order*, which granted Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) Application for a Certificate of Convenience and Necessity filed on April 27, 2016, subject to the terms and conditions of the Non-Unanimous Stipulation and Agreement (“Stipulation”).

2. The pertinent portion of the Stipulation reads

Additional Site Information. As Ameren Missouri identifies locations, it will file the information required by Appendix A in this docket and the Signatories will review that information to verify that the site meets the agreed-upon criteria according to the process outlined in Appendix A. If there is a dispute regarding whether the site meets the agreed-upon criteria the dispute will be referred to the Commission for resolution.

3. In accordance with the terms of the Stipulation, Ameren Missouri filed site documentation on November 16, 2018 and January 3, 2019.

4. Staff has reviewed Ameren Missouri's submission and has determined that the proposed site meets the minimum application conditions, sub-conditions, and additional considerations for Site Evaluation as contained in the Stipulation. Staff's complete report is attached.

WHEREFORE, Staff prays the Commission will accept this report and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 15th day of January 2019, to all counsel of record.

/s/ Nicole Mers

REPORT OF THE STAFF

TO: Missouri Public Service Commission Official Case File,
Case No. EA-2016-0208, 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
Necessity Authorizing it to Offer a Pilot Distributed Solar Program and
File Associated Tariff

FROM: Daniel I. Beck, P.E., Utility Regulatory Engineering Manager
Engineering Analysis Department

/s/ Natelle Dietrich / 01/15/19 /s/ Nicole Mers / 01/15/19
Commission Staff Division/Date Staff Counsel's Office / Date

SUBJECT: Staff Memorandum Reviewing Site Specific Information to Verify that the
Site Meets the Commission Approved Criteria

DATE: January 15, 2019

On December 21, 2016, the Missouri Public Service Commission issued its Report and Order which granted Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri") Application for a certificate of convenience and necessity filed on April 27, 2016, subject to the terms and conditions of the Non-Unanimous Stipulation and Agreement (Stipulation). That Stipulation outlined a review process that included the filing of a Commission Staff ("Staff") report that "verified that the site selected does (or does not) meet the agreed-upon criteria." Staff has reviewed the information provided by Ameren Missouri, which included a filing on November 16, 2018, a filing on January 3, 2019, and responses to several data requests issued by Staff. Staff has verified that the site selected does meet the agreed-upon criteria.

BACKGROUND

Ameren Missouri filed its Application for a Blanket Certificate of Public Convenience and Necessity on April 27, 2016 for a Solar Partnership Pilot, which was supported by Direct Testimony filed on that same date. On August 31, 2016, a Non-Unanimous Stipulation and Agreement was filed by Ameren Missouri, Staff, Missouri Department of Economic Development - Division of Energy, Earth Island Institute d/b/a Renew Missouri and United for Missouri, Inc. On September 9, 2016, The Office of Public Counsel (“Public Counsel”) filed its objection to the Stipulation. In the Commission’s subsequent Report and Order, it noted that since Public Counsel objected to the Stipulation, it becomes a joint position statement of those parties.¹ After Rebuttal and Surrebuttal testimony were filed and a hearing was held, the Commission issued its Report and Order on December 21, 2016, which included the following:

Union Electric Company d/b/a Ameren Missouri’s application for a certificate of convenience and necessity filed on April 27, 2016, is granted, subject to the terms and conditions of the Non-Unanimous Stipulation and Agreement filed on August 31, 2016. This Stipulation and Agreement is attached hereto as Attachment A and incorporated herein as if fully set forth. The signatory parties are ordered to comply with the terms of that Stipulation and Agreement.

Subsequent to this Order, a Notice of Agreement and Dismissal of Appeal and a Notice of Amended Agreement were filed by Public Counsel and Ameren Missouri. These documents outlined the terms by which Ameren Missouri and Public Counsel agreed to resolve Public Counsel’s appeal of Ameren Missouri’s Solar Partnership Pilot. On November 16, 2018 Ameren Missouri’s Site Documentation Submission was filed with four (4) Exhibits. These Exhibits included documents, photographs and drawings

¹ Commission rule 4 CSR 240-2.115(2)(D).

related to the proposed site of the first Solar Partnership Pilot. On January 3, 2019, Ameren Missouri's Supplemental Site Documentation Submission was filed as was three sets of supplemental information that would reasonably be described as blueprints and drawings for the project.

DISCUSSION

While all of the documentation provided was helpful, Exhibit 4 to Site Documentation Submission provides a point by point summary of Ameren Missouri's response to the Conditions and Considerations that were ordered by the Commission. In addition to reviewing four (4) exhibits filed on November 16, 2018 and the three (3) additional documents filed on January 3, 2019, Staff submitted data requests to clarify the information provided. The four (4) November 16, 2018 Exhibits included a Summary of the Request for Proposal for the project, specifications for various electronic equipment, photos and other documents for the project, and the previously mentioned Site Documentation Submission. The three documents filed on January 3, 2019 were detailed drawings or blueprints that show the design of both electrical components and structural components related to the project.

The site is at 4466 Duncan Avenue, St. Louis, Mo 63110 and will be a roof top mounted solar facility with 4,547 solar panels that are approximately 80 inches long and 40 inches wide with a DC rating of 400 watts per panel for a total capacity of 1,818,800 watts or 1.8188 megawatts ("MW"). The site is described as BJC's and Washington University's East Parking Garage at 4466 Duncan Avenue that supports the health center and is approximately 302 feet wide and 381 feet deep with 8 levels above ground, and was completed in 2015. The panels will be arranged in a tiered design with

eight tiers. The tiers will span the entire 302 foot width of the parking garage and act as a canopy for the upper level.

CONCLUSION

Staff has reviewed Ameren Missouri's filings and has determined that the seven minimum application conditions and four sub-conditions will be met with the site selected. In addition, Staff has reviewed Ameren Missouri's filings and has determined the twelve additional considerations for Site Evaluation have also been met. Staff would note that some information, like the cost of interconnection and upgrade costs cannot be known prior to the completion of construction but have instead been estimated.

Staff has verified that the Company is current on its annual report filings and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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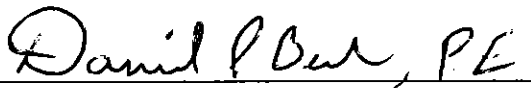
File No. EA-2016-0208

AFFIDAVIT OF DANIEL I. BECK, P.E.

State of Missouri)
) ss.
County of Cole)

COMES NOW DANIEL I. BECK, P.E., and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Report of the Staff*; and that the same is true and correct according to his best knowledge and belief.

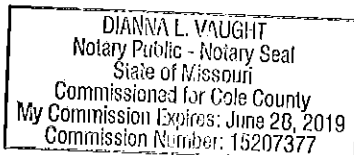
Further the Affiant sayeth not.

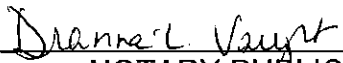


Daniel I. Beck, P.E.

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 15th day of January, 2019.





NOTARY PUBLIC

My commission expires: June 28, 2019