

Exhibit No. 209

Exhibit No.:
Issue(s): Community Solar
Witness: Amanda Coffey
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2021-0240
Date Testimony Prepared: October 15, 2021

MISSOURI PUBLIC SERVICE COMMISSION
INDUSTRY ANALYSIS DIVISION
ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

AMANDA COFFER

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

CASE NO. ER-2021-0240

Jefferson City, Missouri
October 2021

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **AMANDA COFFER**

4 **UNION ELECTRIC COMPANY**
5 **d/b/a Ameren Missouri**

6 **CASE NO. ER-2021-0240**

7 Q. Please state your name and business address.

8 A. My name is Amanda Coffe, and my business address is Missouri Public Service
9 Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission ("Commission")
12 as an Associate Engineer in the Engineering Analysis Department of the Industry Analysis
13 Division.

14 Q. Please describe your educational background and relevant work experience.

15 A. I received my Bachelor of Science degree in Chemical Engineering from the
16 University of Missouri in 2012. I was employed by the Missouri Department of Natural
17 Resources as an Environmental Engineer from 2015 through 2018. I have been employed by
18 the Commission since 2018 as an Associate Engineer. My credentials and case participation are
19 included in Appendix 1 of Staff Report Class Cost of Service.

20 Q. What is the purpose of your rebuttal testimony?

21 A. I will be responding to the testimony of Ameren Missouri witness
22 Annemarie Nauert, regarding Ameren Missouri's Community Solar Program.

23 Q. What is the Community Solar Program?

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1 A. The Community Solar Program is a subscription-based solar program that offers
2 an alternative to customer-owned solar for customers that are unwilling or unable to install or
3 lease their own solar panels. Subscribers to the program sign up for solar blocks of 100 kWh
4 that will offset an equivalent kWh amount of electricity they receive from their standard service,
5 up to 50% of their energy usage. The program tariff was approved after a settlement between
6 Ameren Missouri, Renew Missouri, Staff of the Missouri Public Service Commission, and the
7 Office of the Public Counsel, in File No. EA-2016-0207 as a pilot program. The program
8 currently has one operational asset, the Lambert Community Solar Facility (Lambert), and one
9 asset that was approved by the Commission April 3, 2021, in File No. EA-2020-0371, the
10 Montgomery Community Solar Facility (Montgomery). Ameren Missouri expects
11 Montgomery to be in service in March 2022¹.

12 Q. What is Ameren Missouri proposing in regard to its Community Solar Program?

13 A. Ameren Missouri is proposing to keep the current Community Solar Pilot
14 Program in place, and add an additional permanent Community Solar Program with the
15 following proposed changes for an as of yet undetermined facility²:

Pilot Design – Lambert and Montgomery	Proposed Additional Program
Solar Blocks of 100 kWh	Fixed percentage of kWh
Customers can subscribe to replace up to 50% of last 12 months' average annual energy usage, in whole block increments (rounding down)	Customers can subscribe to replace up to 100% of monthly usage, in 1% increments
Resource construction cannot begin until 90% subscription level	Resource construction cannot begin until 50% subscription level
Participation fee of \$25/block for new resource (but not if the customer replacement from waitlist) enrollments only	Fixed participation fee of \$25 for all enrollments
Solar Generation Charge Cap	terminology changed to Solar Generation Rate Cap
Total Facilities Charge tied to general rate cases	terminology changed to Total Facilities Rate

¹ Per Ameren Missouri's Report Filed October 11, 2021, in File No. EA-2020-0371.

² Direct Testimony of Annemarie Nauert, Table 1, page 8.

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1 Q. Does Staff agree with a new permanent Community Solar Program?

2 A. No. In response to Staff data request 455, Ameren stated that Ameren Missouri
3 would retain the pilot tariff so that subscribers to the pilot program could continue to receive
4 community solar service at the terms they agreed to. Retaining the pilot program and adding a
5 second program has the potential to be very confusing to customers or could drive customers
6 to switch programs if specific terms are not included in the implementing tariff to prevent so.

7 Q. Which proposed changes does Staff agree with?

8 A. Staff has no objection to the fixed participation fee of \$25 for all enrollments or
9 the terminology changes.

10 Q. Which proposed changes does Staff not agree with?

11 A. Staff does not agree with the 50% subscription level for new resource
12 construction. Currently, Ameren is required to obtain 90% subscription level of the planned
13 resources capacity before starting construction of new facilities. Staff continues to recommend
14 this requirement to protect from undersubscription. Ms. Nauert justifies the change to
15 50% subscription level by saying that Renewable Energy Certificates (RECs) associated with
16 the under-subscribed portion of the facility would be managed as part of Ameren
17 Missouri's Renewable Energy Standard Compliance (RES) targets³. Staff argues that because
18 Ameren Missouri is currently having trouble meeting its RES Compliance targets, as discussed
19 in further detail in the Rebuttal Testimony of Staff Witness Claire Eubanks, and as evidenced
20 by Ameren Missouri's current Request for Variance from RES Rule in File No. EE-2022-0074,
21 it would be more beneficial for Ameren to work towards meeting its RES requirements before
22 adding an additional community solar program with additional solar resources.

³ Direct testimony of Annemarie Nauert, page 6, lines 11-13.

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1 Q. In her testimony, Ms. Nauert draws the conclusion that there is a need for a
2 voluntary subscription-based solar program based on the responses of two participant surveys⁴.

3 Would Staff agree with this conclusion?

4 A. No. More information is needed in order to make any big changes or expand
5 the Pilot Program with an additional permanent program as is proposed. The first survey was
6 conducted in July of 2019, before the Lambert facility was commercially operational in
7 August of 2019. The survey was sent via email to a total of 418 participating Ameren Missouri
8 customers. Ameren Missouri received 92 responses. The response rate for this survey
9 was just 22% of the 92 respondents, only the data collected from 80 participants was used for
10 most of the questions. For questions that required an open ended response, only the data
11 from 30 of the original 92 participants was used. The second survey was done in July of 2020
12 after the Lambert facility had been operational for about a year. The survey was sent via email
13 to 1,669 participating Ameren Missouri customers. They received a response rate of 22% again,
14 which is 369 responses. The results from the surveys are helpful, however, for both of these
15 surveys, the response rate is rather low, the program hasn't been in effect for very long, and
16 many of the responses to the surveys were from customers still on the waitlist. It would be
17 good to conduct further surveys, over a longer period of time, possibly using different methods
18 in order to obtain responses from more customers.

19 Q. In her testimony, Ms. Nauert states that the primary barrier to faster enrollment
20 for waitlist customers is the 90% pre-construction subscription requirement for new facilities⁵.

21 Does Staff agree with this?

⁴ Direct Testimony of Annemarie Nauert, page 4, lines 6-12.

⁵ Direct Testimony of Annemarie Nauert, page 5, lines 18-21.

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1 A. No. Staff does not agree that the 90% pre-construction subscription requirement
2 for new facilities is the primary barrier to faster enrollment for waitlisted customers. Ms. Nauret
3 also mentions in her testimony that the Lambert facility was fully subscribed just 55 days after
4 the original tariff went into effect. From June to August of 2020, with active promotion of the
5 program, there was an uptick in demand for the program that led to 93% of the planned capacity
6 being accounted for at the time the Certificate of Convenience and Necessity (CCN) for the
7 Montgomery resource was filed. She also boasts that even in the absence of promotion, the
8 waitlist continues to grow. So far, once they actually have a plan for a facility, it only takes a
9 few months to reach the 90% requirement. The Community Solar Tariff was originally
10 submitted in April of 2016, Ameren Missouri Filed a CCN for the Lambert facility in March of
11 2018 and the CCN for the Montgomery facility in October of 2020. This suggests that there is
12 more to the time delay than just the 90% requirement. Additional detail regarding the timing is
13 shown below:

- 14 • The original program tariff was approved October 13, 2018 in File No.
15 EA-2016-0207.
 - 16 ▪ Original application for tariff submitted April 22, 2016
 - 17 ▪ Ameren Missouri identified a location at the St. Louis Lambert
18 International Airport (called the Ameren Lambert Community
19 Solar Energy Center), collected the needed bids, and made the
20 required filing on March 7, 2018.
- 21 • The Lambert facility was fully subscribed by December 10, 2018.
- 22 • The Lambert facility was commercially operational in August 2019.
- 23 • Unanimous Stipulation and Agreement, ET-2020-0022, effective
24 June 27, 2020, to expand the program with a second resource.
- 25 • From June to August 2020, the Company actively promoted the
26 opportunity to subscribe to a second resource, leading to an uptick in
27 demand and approximately 93% of the planned capacity accounted for
28 at the time the CCN application was filed.
- 29 • A CCN for the Montgomery facility was granted on April 3, 2021 in File
30 No. EA-2020-0371.

1 Q. In her testimony, Ms. Nauert states that she expects the Community Solar
2 Program to grow as a result of the Pure Power program ending⁶. Does Staff agree with this
3 conclusion?

4 A. No. At this time, there is no basis on which to draw a conclusion. Ameren
5 Missouri indicated in response to Staff data request #656 that they had not surveyed the current
6 Pure Power customers to find out if they would be interested in signing up for the Community
7 Solar Program after the Pure Power program ends. Staff recommends Ameren Missouri
8 conduct a survey of the current Pure Power customers in order to determine interest.

9 Q. What are Staff's overall recommendations regarding the Pilot Community
10 Solar Program and the proposed expansion?

11 A. Staff recommends that Ameren Missouri first complete the first annual
12 reporting required per the Non-Unanimous Stipulation and Agreement in EA-2016-0207,
13 paragraph 17, page 10, for the current Pilot Program, before expanding the Community
14 Solar Program.

15 Reporting. Ameren Missouri shall file reports with the Commission, in
16 this docket, detailing lessons learned. Reports shall be filed quarterly
17 until the first Pilot facility is fully constructed or Ameren Missouri
18 determines it will not be constructed due to lack of enrollment.
19 Thereafter, a report shall be filed annually for the next four years. This
20 sequence shall be repeated for construction of the second Pilot facility,
21 if applicable. Thereafter, reports shall be filed every three years until the
22 Pilot facilities are retired. The report will, at a minimum, address the
23 issues listed in Appendix D.

24 Q. Does this conclude your rebuttal testimony?

25 A. Yes, it does.

⁶ Direct Testimony of Annemarie Nauert, page 4, lines 21-22, and page 5, lines 1-2.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust Its)
Revenues for Electric Service) Case No. ER-2021-0240

AFFIDAVIT OF AMANDA COFFER

STATE OF MISSOURI)
)
) ss.
COUNTY OF COLE)

COMES NOW AMANDA COFFER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amanda Coffe*r; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

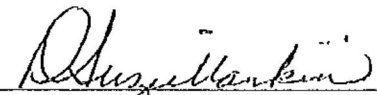


AMANDA COFFER

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 13th day of October 2021.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public