

# Exhibit No. 103

Staff – Exhibit 103  
Jordan T. Hull  
Rebuttal Testimony  
File No. EA-2022-0245

*Exhibit No.:*  
*Issue(s):* *Certificates of  
Convenience,  
Feasibility Analysis*  
*Witness:* *Jordan T. Hull*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *EA-2022-0245*  
*Date Testimony Prepared:* *December 21, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**ENERGY RESOURCES DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**JORDAN T. HULL**

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

**CASE NO. EA-2022-0245**

*Jefferson City, Missouri*  
*December 2022*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JORDAN T. HULL**

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

6 **CASE NO. EA-2022-0245**

7 Q. Please state your name and business address.

8 A. My name is Jordan T. Hull, and my business address is Missouri Public Service  
9 Commission; 200 Madison Street, PO Box 360; Jefferson City, MO 65102-0360

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

11 A. I am employed by the Missouri Public Service Commission as an Associate  
12 Engineer in the Energy Resources Department in the Industry Analysis Division.

13 Q. Please describe your educational and work background.

14 A. Please see Schedule JTH-r1.

15 Q. Purpose of your testimony?

16 A. The purpose of my rebuttal testimony is to discuss the application of  
17 Ameren Missouri and to provide more information to the commission about whether  
18 Boomtown Solar, LLC is qualified to construct and install; and whether Ameren Missouri  
19 is qualified to, own, operate, maintain, and otherwise control and manage the project.

20 Q. Who Is Boomtown Solar?

21 A. Boomtown Solar LLC was formed by Invenergy Renewables specifically for  
22 this project.

23 Q. Who is Invenergy?

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Jordan T. Hull

1 A. Invenergy is a privately held, global developer and operator of sustainable  
2 energy solutions.

3 Q. What do Invenergy's projects generally consist of?

4 A. Invenergy develops, owns, and operates large-scale renewable and other clean  
5 energy generation and storage facilities worldwide. The home office is located in Chicago with  
6 regional development offices in North America, Latin America, Asia, and Europe. According  
7 to their website, Invenergy has successfully completed 49 solar projects and 110 wind projects.

8 Q. How long has Invenergy been in business?

9 A. Invenergy has been in business for 20 years.

10 Q. Does Ameren Missouri have experience with operating and maintaining a solar  
11 generation?

12 A. Yes. Ameren Missouri has other solar generation in its generation resources that  
13 it operates and maintains.

14 Q. Who will provide vegetation control and maintenance for this project?

15 A. The project will be maintained in the same manner and fashion as all of Ameren  
16 Missouri's existing generation is operated, including its existing renewable generation. More  
17 specifically, the project will be operated and maintained by Ameren Missouri's Energy  
18 Management & Trading group, similar to the Company's other large-scale renewable generators  
19 such as the Atchison County and High Prairie wind farms, and the O'Fallon and Montgomery  
20 solar facilities.<sup>1</sup>

21 Q. Are Boomtown Solar LLC and Ameren Missouri qualified to execute the scope  
22 of this project?

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<sup>1</sup> Data request 0068 from EA-2022-0245

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Jordan T. Hull

1           A.     Yes. Staff concludes Boomtown Solar LLC is qualified to construct and install  
2 this project, and Ameren Missouri is qualified to own, operate, maintain, and otherwise control  
3 and manage the project.

4           Q.     Does this conclude your Rebuttal testimony?

5           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-2022-0245  
Approval of a Subscription-Based Renewable )  
Energy Program )  
)

**AFFIDAVIT OF JORDAN T. HULL**

STATE OF MISSOURI )  
) ss.  
COUNTY OF COLE )

**COMES NOW JORDAN T. HULL** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Jordan T. Hull*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
JORDAN T. HULL

**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 21<sup>st</sup> day of December 2022.



  
\_\_\_\_\_  
Notary Public

**Jordan T. Hull**

**CURRENT POSITION:**

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

**EDUCATIONAL BACKGROUND & WORK EXPERIENCE:**

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

**Summary of Case Involvement:**

<b>Case Number</b>	<b>Utility</b>	<b>Type</b>	<b>Issues</b>
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization

Case Number	Utility	Type	Issues
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment.
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	Transmission	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
E0-2022-0245	Ameren- Missouri	Transmission	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment