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Exhibit No. 106

Staff – Exhibit 106
Amanda Coffey
Direct Testimony (Rate Design)
File No. ER-2022-0337

Exhibit No.:
Issue(s): Solar Rebate Tariff
Witness: Amanda Coffe
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2022-0337
Date Testimony Prepared: January 24, 2023

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

DIRECT TESTIMONY
Class Cost of Service/Rate Design

OF

AMANDA COFFER

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Jefferson City, Missouri
January 2023

1 **DIRECT TESTIMONY OF**

2 **AMANDA COFFER**

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

5 **CASE NO. ER-2022-0337**

6 Q. Please state your name and business address.

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

9 Q. Are you the same Amanda Coffe who previously filed testimony in this case?

10 A. Yes I am.

11 **SOLAR REBATE TARIFF**

12 Q. What is Ameren proposing in regards to its solar rebate tariff?

13 A. In his testimony, Ameren witness Michael Harding mentions the plan to
14 eliminate the outdated solar rebate language in Sheet Nos. 88.9 -88.13.¹

15 Q. Does Ameren currently have two solar rebate riders in its tariff?

16 A. Yes. Rider SR found in Sheet Nos. 88.9-88.13 and 88-88.8.

17 Q. What is the difference in these two riders?

18 A. Sheet Nos. 88.9-88.13 implemented the requirements in 393.1030.3. RSMo,
19 which outlined solar rebate requirements from June 30, 2014 through June 30, 2020; and
20 Sheet Nos. 88-88.8 implemented the requirements in 393.1670 RSMo, which outlines solar
21 rebate requirements from January 1, 2019 through December 31, 2023.

22 Q. You previously mentioned the language in Sheet Nos. 88.9-88.13 is outdated.
23 How is it outdated?

¹ Page 14, lines 7-11.

1 A. The purpose of the Rider SR found in Sheet Nos. 88.9-88.13 was to implement
2 the solar rebate established through 393.1030 RSMo. Section 393.1030.3 outlined
3 requirements for solar rebates for systems that became operational prior to June 30, 2020.
4 After June 30, 2020 there is no requirement. The requirement states in part,

5 “The solar rebates shall be two dollars per watt for systems becoming operational on or
6 before June 30, 2014; one dollar and fifty cents per watt for systems becoming operational
7 between July 1, 2014, and June 30, 2015; one dollar per watt for systems becoming operational
8 between July 1, 2015, and June 30, 2016; fifty cents per watt for systems becoming operational
9 between July 1, 2016, and June 30, 2017; fifty cents per watt for systems becoming operational
10 between July 1, 2017, and June 30, 2019; twenty-five cents per watt for systems becoming
11 operational between July 1, 2019, and June 30, 2020; and zero cents per watt for systems
12 becoming operational after June 30, 2020.”

13 Q. With this change will Ameren still be offering solar rebates to customers?

14 A. Yes. Ameren will still be offering solar rebates through Rider SR on tariff Sheet
15 Nos 88-88.8 which is in effect through 2023.

16 Q. What is your recommendation regarding this change?

17 A. I recommend the Commission approve the elimination of the outdated solar
18 rebate language in Sheet Nos. 88.9 -88.13.

19 Q. Does this conclude your direct testimony?

20 A. Yes it does.

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-2022-0337

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 *Direct 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 20th day of January 2023.

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