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Supplier's Facilities  
Witness: Jonathan M. Schmidt  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. EO-2022-0190**

**REBUTTAL TESTIMONY**

**OF**

**JONATHAN M. SCHMIDT**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**D/B/A AMEREN MISSOURI**

**St. Louis, Missouri  
April, 2022**

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**REBUTTAL TESTIMONY**

**OF**

**JONATHAN M. SCHMIDT**

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**I. INTRODUCTION**

1

2 **Q. Please state your name and business address.**

3 A. My name is Jonathan M. Schmidt. My business address is One Ameren  
4 Plaza, 1901 Chouteau Ave., St. Louis, Missouri.

5 **Q. What is your position with Ameren Missouri?**

6 A. My position is Director, Distribution Planning.

7 **Q. Please describe your educational background and employment**  
8 **experience.**

9 A. I have a Bachelor of Science in Electrical Engineering from Missouri  
10 Science & Technology University in Rolla, Missouri, and am a Registered Professional  
11 Engineer in Missouri. I have worked for Ameren Missouri for just over 25 years. For the  
12 first 21 years, I have worked in five different division offices as an Engineer working with  
13 customers, addressing reliability issues, designing the distribution system, and conducting  
14 load analysis. Over the last four years, I have supervised the Distribution Planning  
15 Department in St. Louis, which covers Ameren Missouri's entire service territory in the  
16 state of Missouri.

1           **Q.     What is the purpose of your testimony?**

2           A.     It is my understanding that the Commission must consider, at a minimum,  
3           certain factors set forth in statute, specifically, in Section 386.800.3. My testimony will address  
4           four of those factors (numbers (4) through (7) and other related considerations).

5           **Q.     What is the first factor the Commission is required to consider in deciding**  
6           **whether the cooperative or Ameren Missouri should serve this subdivision?**

7           A.     The suppliers' respective operational ability to serve within three years after the  
8           date the annexation became effective, which I understand to have been January 18 of this year.

9           **Q.     Can Ameren Missouri reliably serve the subdivision within that time**  
10          **period?**

11          A.     Yes, Ameren Missouri can provide all electric service needed starting with the  
12          beginning of construction according to the developer's schedule, and can provide all electric  
13          service needed to each individual home as they are constructed and completed according to the  
14          developer's schedule, which is outlined generally in Schedule TT-06 of Mr. Troy Thurman's  
15          direct testimony. This is reflected in greater detail in what I understand to be Co-Mo Electric  
16          Cooperative, Inc.'s ("Co-Mo") "feasibility study," which is Schedule AB-07 to Mr. Aaron  
17          Bradshaw's direct testimony.<sup>1</sup> I should note that as of the filing of this testimony the schedule  
18          appears to have slipped about a month. Given what I understand is the timeline for resolving  
19          this case to be (likely by mid-June), I don't see any reason why Ameren Missouri would not be  
20          in a position to provide what is needed for utility line installation in time for the developer to  
21          start developing the residential lots and homes themselves once the case is decided, which  
22          appears to be the earliest possible date that would happen.

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<sup>1</sup> According to Co-Mo's Response to Ameren Missouri Data Request 12, Schedule AB-07, Exhibit H to Co-Mo's Application, and Schedule JS-01 to Mr. Jon Schulte's direct testimony, are all the same.

1           **Q.     Please provide details on Ameren Missouri's plans to serve the subdivision**  
2 **in a timely fashion.**

3           A.     As shown on Schedule JMS-01, Ameren Missouri has existing distribution  
4 facilities on three sides of the subdivision. The facilities on two sides of the subdivision are  
5 contiguous to the subdivision boundary, while the facilities on the third side (the south end) are  
6 located directly across Pearre Lane, just 60 feet away. Ameren Missouri possesses a franchise  
7 from the City of Boonville and thus will simply extend its line that 60 feet across Pearre Lane  
8 (a city street), at which time it can feed the subdivision from the north and the south.<sup>2</sup> At the  
9 same time, Ameren Missouri will upgrade approximately 1,000 feet of the conductor on that  
10 existing line at the south to increase capacity to serve the substation feeding that circuit. The  
11 60-foot road crossing could be done almost immediately after this case is decided and given the  
12 power needs early in the development, Ameren Missouri could provide sufficient power right  
13 away. The upgrade of the 1,000 feet of conductor will take about two weeks start to finish, and  
14 could be accomplished in approximately the first 60-days after this case is decided. It is not  
15 necessary, however, to provide service during the first few months when initial home  
16 construction will be taking place.<sup>3</sup>

17           **Q.     Are there any other existing electric lines at the south end of the**  
18 **subdivision?**

19           A.     No.

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<sup>2</sup> It could hook into the underground distribution system from the west but it makes more sense to serve it from the line at the south (initially – as I understand it the subdivision will be developed south to north) and then also from the lines adjacent to the subdivision on the south side of State Highway 98, at the north end of the subdivision.

<sup>3</sup> According to Co-Mo's response to Ameren Missouri's Data Request No. 13, temporary construction service has been requested in July. Ameren Missouri can meet that timeline.

1           Q.     **Once the 1,000 feet of reconductoring on the Company's line at the south**  
2 **is complete, what available capacity to serve the subdivision will the Company have?**

3           A.     7.9 MW.<sup>4</sup>

4           Q.     **What is the expected load to be served off of that line, including service to**  
5 **the subdivision once all of the homes are completed?**

6           A.     According to Co-Mo's information, the expected load in the subdivision once it  
7 is completely developed is \*\*\* \_\_\_\_\_ \*\*\*.

8           Q.     **On what other factors will you be providing the Commission with**  
9 **information?**

10          A.     I will provide evidence that deals in whole in part with three other factors listed  
11 in the statute, being avoiding the wasteful duplication of electric facilities, minimizing  
12 unnecessary encumbrances on the property and landscape within the area to be annexed, and  
13 preventing the waste of materials and natural resources.

14          Q.     **Will Ameren Missouri need to impact any private land at all to serve the**  
15 **subdivision?**

16          A.     We will impact land within the subdivision in the same way Co-Mo would  
17 impact land within the subdivision because our lines will be underground and we will have  
18 padmount transformers in the development. In terms of other land, we will not impact private  
19 land at all since we will only need to cross Pearre Lane (the 60-foot crossing noted above) within  
20 the public right-of-way using our existing franchise rights.

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<sup>4</sup> MW stands for megawatts. One MW is roughly equivalent to one megavolt ampere (MVA).

1           **Q.     What investment will the Company need to make to serve the subdivision?**

2           A.     The underground system (conductor, conduit, padmount transformers) is  
3 estimated to cost approximately \*\*\* \_\_\_\_\_ \*\*\* for the entire subdivision, plus  
4 approximately \*\*\* \_\_\_\_\_ \*\*\* for meters for the 446 homes. We estimate we will invest an  
5 additional approximate \*\*\* \_\_\_\_\_ \*\*\* to reconductor the 1,000 feet I mentioned and to cross  
6 Pearre Lane, bringing the total to \*\*\* \_\_\_\_\_ \*\*\*. With that investment, we will be able  
7 to reliably serve the entire subdivision. For the Commission's information and likely around the  
8 time all 446 homes are built (in 2030), we will likely reconductor approximately 2.3 miles of  
9 our existing line at the north to provide a redundant feed to the subdivision. We have loads in  
10 other areas that are served by only one source of supply, and we are still able to reliably serve  
11 them, but in general and given the relatively short distance that would be covered by the  
12 reconductoring project, we like to provide a second source of supply in these situations. In  
13 addition, a majority of the line on the north line along Highway 98 will be approaching 70 years  
14 old by 2030 and has conductor that we no longer use. This additional investment is estimated to  
15 cost approximately \*\*\* \_\_\_\_\_ \*\*\*.

16           **Q.     How does the \*\*\* \_\_\_\_\_ \*\*\* million, or even that sum, plus the additional**  
17 **\*\*\* \_\_\_\_\_ \*\*\* compare to Co-Mo's planned investment to serve the subdivision?**

18           A.     If we did not reconductor the north line in the 2030/2031 timeframe, our  
19 investment would be about 64% of of Co-Mo's investment. With the reconductoring, our total  
20 investment would be a about 83% of Co-Mo's investment. However, not all of the  
21 \*\*\* \_\_\_\_\_ \*\*\* to reconductor the north line is attributable to providing a second source of  
22 supply to Fox Hollow (if the Commission determines that we should serve it) because as noted

1 we would reductor the line any way, regardless of any service to Fox Hollow, given its age  
2 and the vintage of conductor along a majority of that line.

3 **Q. How do Ameren Missouri's construction activities and impacts**  
4 **associated with serving the subdivision compare to Co-Mo's construction activities**  
5 **and impacts to serve the subdivision?**

6 A. As noted, activities within the subdivision will be the same regardless of  
7 which company serves. Outside the subdivision, Co-Mo will \*\*\* \_\_\_\_\_

8 \_\_\_\_\_

9 \_\_\_\_\_

10 \_\_\_\_\_ \*\*\* See the red lines on highly confidential Schedule JMS-01. Co-Mo's

11 \*\*\* \_\_\_\_\_

12 \_\_\_\_\_

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_ \*\*\* By contrast, the impact of any reductoring we do (the 1,000 feet

16 at the south, which we will do and the 2.3 miles which we likely do several years from now

17 at the north), will have essentially no impact on the landscape or the view for those in the

18 area, and will not involve any new impact on the right-of-way or private property at all.

19 For our 60 foot extension across Pearre Lane, we will add one pole in the street right of

20 way.

1           **Q.     What, if anything, does Ameren Missouri need to do between now and**  
2 **when the Commission decides this case to provide service to the subdivision?**

3           A.     Very little. We are preparing staking sheets and construction drawings now,  
4 and those will be completed by the end of May. We only need one permit from the Missouri  
5 Department of Transportation to allow us to work within the right-of-way to reconnector  
6 the approximately 1,000 feet of line at the south. Such permits are issued two days after  
7 they are requested, and are routine. As I discussed earlier, the developer will have all the  
8 power he needs for construction when he needs it and the homes themselves will also have  
9 the service they need, when they need it.

10          **Q.     Does this conclude your rebuttal testimony?**

11          A.     Yes, it does.



EO-2022-0190  
SCHEDULE JMS-01  
**IS HIGHLY  
CONFIDENTIAL IN  
ITS ENTIRETY**

