

**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 and a Certificate of Public Convenience and) File No. EA-2016-0207
Necessity Authorizing it to Offer a Pilot Subscriber)
Solar Program and File Associated Tariff.)

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Approval to) File No. ET-2020-0022
Expand Its Community Solar Pilot Program and)
Associated Tariff.)

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission and) File No. EA-2020-0371
Approval and a Certificate of Public Convenience and)
Necessity.)

REPORT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and pursuant to Paragraph 17 and Appendix D of the *Non-Unanimous Stipulation and Agreement* submitted in File No. EA-2016-0207 on September 23, 2016, Paragraph 12 of the *Unanimous Stipulation and Agreement* submitted in File No. ET-2020-0022, and Paragraph 15, Condition 3 as modified, of the *Unanimous Stipulation and Agreement* submitted in File No. EA-2020-0371, submits its *Report* attached hereto as Attachment A.

Respectfully Submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs, #68970
Corporate Counsel
1901 Chouteau Avenue, MC 1310
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-2041 (phone)
(314) 554-4014 (facsimile)
amerenmoservice@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in captioned cases on this 14th day of January, 2022.

/s/ Jermaine Grubbs
Jermaine Grubbs

ATTACHMENT A

2021 Q4 Community Solar

Missouri Public Service Commission (PSC) report

File Nos. EA-2016-0207 & ET-2020-0022

Report Summary

- Construction has been underway on the second Community Solar facility as communicated in the previous two quarterly reports. Due to COVID-19 related manufacturer delays on racking components, a vendor has declared force majeure, and the anticipated in-service date is now late March 2022. We are currently assessing the need to file to extend the date for refund of the participation fee in the pilot tariff of March 31, 2022, in light of these continuing pandemic-related materials delays.
- As of January 11, 2022, customer enrollment stands at 100% of resource capacities, with a waitlist of 766 customers.
- Community Solar participants and non-participants were surveyed in the prior quarter in accordance with the customer feedback and lessons learned requirements in Appendix D of the program stipulation and agreement.

Background

In 2018, Ameren Missouri received PSC approval for a Community Solar pilot program.

An overall goal of this program is to provide access to solar generation to Ameren Missouri residential and small business customers who are interested in solar generation but may not have the ability or desire to install and maintain their own solar panels.

Program participants enroll and agree to pay for solar blocks of 100 kilowatt-hours (kWh) each that will replace an equivalent kWh amount of electricity they receive from their standard class of service. Customers can replace up to fifty percent of their average annual electric energy usage.

Program Enrollment Status

As of January 11, 2022, customer enrollment stands at 100% of resource capacities, with a waitlist of 766 customers.

Lambert Community Solar Facility

The first Community Solar facility is located on St. Louis Lambert International Airport property, which is an ideal location for solar panels with an abundance of open land that would otherwise go unused. Panel layout is designed to be positioned away from runways and out of the line-of-sight of pilots taking off or coming in for a landing.

The construction of this site started in February 2019, and the site was placed in-service on August 9, 2019. Participating customers received their first energy statement that reflected the new energy charges in August 2019 and have continued to be billed monthly. In April 2021, customers received a report of RECs retired on their behalf from facility operation in 2020.

Montgomery Community Solar Facility

As communicated in previous quarterly reports, the second Community Solar facility is currently under construction. Due to COVID-19 related manufacturer delays, a vendor for racking components has declared force majeure. Ameren Missouri is continuing to monitor the impact of this vendor delay, and we have updated our anticipated in-service date to late March 2022. We are currently assessing the need to file to extend the date for refund of the participation fee in the pilot tariff of March 31, 2022, in light of these continuing pandemic-related materials delays.

Here is a selection of project site images taken the week of December 14, 2021:





Program Survey

Community Solar participants were surveyed in October 2021 in accordance with the customer feedback and lessons learned requirements in Appendix D of the program stipulation and agreement.

Future Considerations

Appendix D to the *Non-Unanimous Stipulation and Agreement* submitted in this proceeding on September 23, 2016 ("*Stipulation*") identifies topics for **Learning Opportunities**, **Key Questions to Explore** and **Planned Activities to Gain Insight**. Information from this analysis will assist Ameren Missouri in determining first-hand how best to structure supply options

related to distributed solar generation. The intent is to engage customers, solicit their feedback and provide a basis to continually adjust the program offering in order to meet their expectations.

Based on additional program data from the October 2021 program survey, updated responses to learning opportunity questions and other lessons learned are addressed below.

Attached with this report are a summary of the survey results and the survey instruments.

Learning Opportunities

Q: How did customers react to the various pricing opportunities presented?

A: Sixty-four percent of customers surveyed were comfortable with the premium over standard rates, and seventy percent were happy with the program rate lock. There is an opportunity to add more information on the program website on program costs: 33% of customers surveyed were not satisfied with understanding costs.

Q: Did the offering of the community solar program provide customers who didn't have access to Net Energy Metering an opportunity to participate in adding solar to the grid?

A: Surveyed participants were satisfied to see an offering of a solar opportunity where the option did not previously exist for them.

- A large percentage of subscriber respondents (82%) felt that the program provides them a solar option that would otherwise not be possible for their household. This indicates those customer households which may not have access to Net Energy Metering are taking advantage of the opportunity to participate in adding solar to the grid.

Q: What value or benefits do customers perceive from adding solar at the distribution level, compared to adding large-scale solar at the transmission level?

A: As a way for survey participants to differentiate between distribution-level and transmission-level solar, participants were asked if they had a preference on where community solar fields are located. Sixty-four percent did not have a preference on location, which indicates they do not have a preference on whether solar is added at a distribution or transmission level.

**Q: What were customers' reactions and sensitivity to other program design aspects?
(e.g. Timing, Fees, Quantities, Length, Commitments, Transferability, Caps, and potential for pricing to increase through facilities charge)**

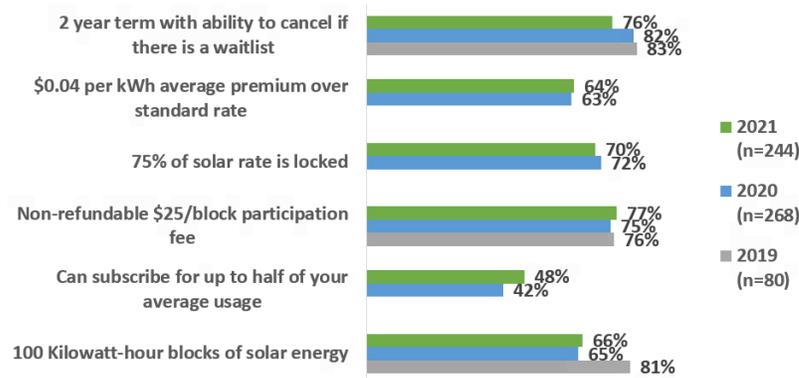
A:

Impression of the Program Terms

Most of the terms were viewed as 'just right' by the majority of respondents, especially the two-year term and non-refundable participation fee.



- The one term that most felt was not enough is *subscribing up to half of their average usage*.



Q. Thinking about the various aspects of the Community Solar program, please indicate if you feel the terms are just right, too much or not enough.

Additional Summary of Survey Results:

- Is the program meeting customer expectations?**
 - Yes, over 90% of program participants who are actively subscribed are very or somewhat satisfied.
 - Satisfaction levels are lower for waitlisted customers, indicating a need for faster access to a subscription.
- What areas of the program need improvement?**
 - Program participants would like to see more communication and interaction from Ameren Missouri, with 46% of respondents asking for monthly communications and 17% asking for bi-monthly communications.
- What aspects of the program do the customers like and dislike?**
 - Positive feedback received on:
 - Offering a new way to participate in solar
 - The positive environmental impact is what drives the majority of enrollments.
 - Utilizing solar energy also ranks highly.
 - Greater knowledge of solar energy as a result of the program
 - Being included in producing renewable energy
 - Opportunities for improvement:
 - Length of time on waitlist
 - The only program term that was not viewed by the majority as "just right" is *subscribing up to half of usage*. It is not considered to be enough.
 - Almost all feel it is important that Ameren Missouri expand the scope of the Community Solar program with more fields and enrollment opportunities (99%) as well as expand the audience to include low and moderate income customers (94%).

- A little less than half of those currently participating in Community Solar have visited the webpage on AmerenMissouri.com. This is down compared to previous years.
 - Most (65%) are aware the Community Solar program is being expanded to a second facility, and almost half (46%) would like monthly updates on the construction of the second solar facility.
- **Are current and potential subscribers willing to commit to a two-year subscription (with option to cancel with a waitlist available)?**
 - Yes, 76% satisfied with two-year commitment period under these terms.
- **Would a shorter mandatory subscription period (or no period at all) be more appropriate?**
 - This may increase satisfaction levels, but since cancellation is allowed given the existence of a waitlist, this does not appear to be an issue for most subscribers.
- **Would current or potential subscribers be interested in the ability to transfer subscriptions to other customers without penalty?**
 - Since we have a waitlist of customers who want to participate, the penalty does not apply and therefore the survey did not ask questions on this topic.
- **Is the block size appropriate?**
 - While 66% of participants feel the block size is appropriate, there appears to be mixed feedback on block size. One-third of respondents would prefer a larger block size. This may be a proxy for desiring a higher (or no) usage cap, which was also a desire of many customers on the survey.¹
- **Should the 50% energy usage limitation be relaxed or eliminated for customers exhibiting high load factors?**
 - High load factor customers are usually non-residential customers. Since the majority of subscribers are residential customers, this question was not included in the survey but will be considered for future surveys.
- **Are customers aware of the potential for part of the subscription fee to increase with potential rate increases? With this knowledge, are they still willing to participate?**
 - Yes, based on the survey, customers appear to be aware of this potential, and are still willing to participate. Seventy percent were satisfied with the rate lock being only 75% of the rate.
- **Are there any aspects of the program that provide the customer with a greater understanding of solar energy generation?**
 - Opportunities exist to more frequently communicate with and educate customers on Community Solar. Ninety-eight percent of participants want to be kept informed and updated at some frequency between monthly and quarterly.
- **What is the impact of the program on non-participating customers?**
 - At the pilot scale there is negligible financial impact to non-participants as the revenues from participants are expected to cover the cost of the solar facility over its life.
 - The majority of non-participants surveyed (88%) do not plan to install solar panels at their primary residence.

¹ This will be addressed in the design of the new permanent program as described in the Company's electric rate review case, File No. ER-2021-0240.

- There is considerable interest to enroll in the community solar (52% very/somewhat).