

2. Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

3. Applicant has no overdue annual report or assessment fees.

4. Communications regarding this Application should be directed to the undersigned counsel and:

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Sr. Director Regulatory Affairs
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II. BACKGROUND

5. Ameren Missouri files this Application in accordance with the terms of the Commission's October 5, 2016, *Order Approving Stipulation and Agreement*, which approved a Non-Unanimous Stipulation and Agreement ("Stipulation and Agreement") among several parties, including the Commission's Staff, relating to the establishment of a pilot solar subscription program (the "Subscriber Solar Program").¹

6. Under the proposed program, customers could voluntarily subscribe and pay for a portion of a solar facility to be constructed specifically for this program.

7. Under the approved terms, Ameren Missouri was to select a location to construct one or more solar facilities and return to the Commission to obtain a Certificate of Convenience

¹ No party opposed the Stipulation and Agreement and it was treated by the Commission as unanimous under 4 CSR 240-2.115(2)(B) and (C).

and Necessity (“CCN”) to allow construction.² The Stipulation and Agreement provided for an expedited review process by the non-Company Signatories (best efforts to complete review within 45 days) and support by the Signatories for issuance of the CCN within 90 days.³ Appendix A to the Stipulation and Agreement set out certain information, in addition to the information required by the Commission’s CCN rule, to be provided with the CCN Application. Ameren Missouri has provided all such information.

8. Since the Commission’s approval of the Stipulation and Agreement, Ameren Missouri has been working on finding an appropriate location for this solar facility. Ameren Missouri has now selected St. Louis Lambert International Airport (“Lambert”) as the location for this solar facility.

9. In addition to obtaining a CCN, Ameren Missouri is to file a program tariff (the terms of which were agreed upon in the Stipulation and Agreement) containing the specific “Solar Block Charges” that subscribing customers would pay.⁴ According to the Stipulation and Agreement, so long as the Solar Block Charges are correctly calculated, the tariff is to take effect 30 days after its filing.⁵ Ameren Missouri has calculated the Solar Block Charges in accordance with the Stipulation and Agreement, and has filed the program tariff including those charges concurrently with the filing of this Application, to be effective in 30 days.

10. Ameren Missouri made one additional change to the tariff, which was not previously contemplated by the Stipulation and Agreement. The Company has decided to market the program using the name “Community Solar,” so it has modified the tariff sheet to use the same

² Stipulation and Agreement, pp. 1-2.

³ *Id.*

⁴ *Id.*, p. 3.

⁵ *Id.*

name (instead of "Subscriber Solar"). The Company feared using one name for marketing and a different name on the tariff would cause customer confusion.

III. REQUEST FOR CCN

11. Ameren Missouri requests a CCN in order to construct, own, operate, and maintain a solar generation facility at Lambert. This location is on land owned by Lambert; Ameren Missouri's facilities will be on the property by virtue of a Lease Agreement, a copy of which is attached as Exhibit 2.

12. As described in the Stipulation and Agreement, Ameren Missouri would construct up to two facilities (no more than 500 kW each, at same location but potentially with different construction timeframes) at this location. The first facility will not be constructed until the Company has obtained a subscription level of at least 500 kW. The Company will begin seeking subscriptions upon the effectiveness of the program tariff.⁶

13. As required by the Stipulation and Agreement, Ameren Missouri previously provided all parties to this case a copy of the Request for Proposal ("RFP") for comment.⁷ The draft RFP was circulated to the parties in March of 2017. The Company did not receive any suggested changes to the RFP from any of the parties.

14. As noted, the tariff associated with this filing is the tariff agreed to by the parties and submitted as Appendix B of the Stipulation and Agreement, except that the Company has added the Solar Block Charge to be paid by customers who subscribe to the program.⁸ The charge was calculated consistent with Appendix C of the Stipulation.

⁶ Stipulation and Agreement, p. 2.

⁷ Stipulation and Agreement, p. 3.

⁸ Stipulation and Agreement, p. 3.

15. Ameren Missouri states that the location selected was selected after considering the minimum application conditions set forth in Appendix A of the Stipulation, which are addressed as follows:

A. The selected site is within Ameren Missouri's service territory, on property owned by Lambert.

B. This location provides a suitable location for solar with a minimum of 85% of the solar resource (i.e., the sun) being available to the solar photovoltaic system. The proposed location is at the highest elevation on the property. There are no obstructions south of the proposed location that would cause shading.

C. The facility will connect into the Ameren Missouri system at the distribution level. Specifically, there is a 12 kV distribution circuit identified within 1,000 feet of the proposed point of common coupling.

D. The facility does not require significant capacity upgrades. There is an estimate of \$50,102 for the infrastructure to install a transformer and 12 kV cable back to the overhead distribution circuit from the point of common coupling.

E. No equipment will be located in a flood plain.⁹

16. In selecting this site, Ameren Missouri reviewed the additional considerations set forth in Appendix A of the Stipulation, which are addressed as follows:

A. Price of Bid – Ameren Missouri competitively bid this project and received two bids. The lowest capital cost bid was selected.

B. Price of Interconnection Cost and Upgrades – The cost of a transformer installation and cabling back to the nearest 12 kV was considered and was minimal.

⁹ Stipulation and Agreement, Appendix A, p. 1.

C. Type of installation (Ground Mount, Rooftop, Canopy) – This will be a ground mount, fixed tilt installation.

D. Quality of site (risk of erosion, deterioration of structure, or quality of soil)
- Environmental and geotechnical studies were performed and resulted in no risks to erosion or deterioration of the structures due to the quality of the soil. The proposed design requires any structures driven into the hill slope to have concrete footings for additional support. All structures at the top of the hill will be driven directly into the ground without concrete footings.

E. Environmental risk of site – The above-mentioned environmental study found no environmental risks at the site.

F. Existing security at site location – There is no existing security infrastructure. Pursuant to the proposed design, fencing and security upgrades are included in the project.

G. Safety risk at location – Ameren Missouri does not believe there are any inherent safety risks associated with the site. During construction, all necessary safety measures will be taken per the Company's safety policies and procedures.

H. Type of Facility (Greenfield, Office, Educational, Industrial, Manufacturing, Retail, Data Center, Warehouse, Healthcare, Military, Recreational, Other) – The property is a greenfield site with no existing infrastructure other than a gravel convenience road.

I. Site Status (Owned, Leased, Other) – The site is currently owned by the City of St. Louis, Missouri and leased to Ameren Missouri for the full economic life of the proposed solar facility plus three years.

17. The Company has requested, or will request, all of the permits and approvals required for the construction of this facility. Ameren Missouri expects to have all permits granted in a timely manner as is necessary for construction of the project. Exhibit 3 contains a list of the government permits required for construction of this facility. The Company will file notice as additional permits are received.

18. The estimated cost of the initial construction of the first 500 kW is just over \$1 million. If the program receives enough subscriptions to build the second 500 kW at the same time, the Company expects the total cost to be \$1.9 million. Ameren Missouri intends to finance this construction through the use of existing treasury funds.

19. This project will not cross any regulated or non-regulated utilities, railroad tracks, or underground facilities. 4 CSR 240-3.105(B)1.

20. Pursuant to 4 CSR 240-3.105(B)2, project plans and specifications are attached to this Application as Exhibit 4.

21. The CCN is necessary for Ameren Missouri to be able to launch the program as agreed to in the Stipulation and Agreement. This, along with other facts contained in this Application, demonstrate that issuance of a CCN authorizing Ameren Missouri to construct, own, operate, and maintain a solar facility at Lambert is necessary or convenient for the public service and should be granted by the Commission.

WHEREFORE, Ameren Missouri respectfully requests that the Commission enter an Order granting Ameren Missouri a Certificate of Convenience and Necessity within 90 days of the filing of this Application to construct a solar facility at St. Louis Lambert International Airport.

Respectfully submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro #60261

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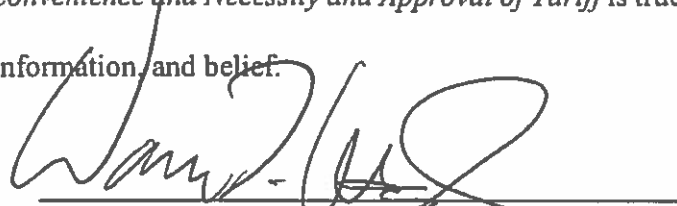
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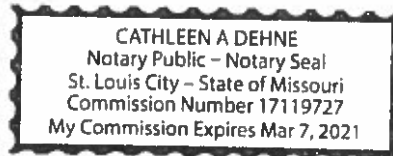
VERIFICATION

The undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Expedited Application For Certificate of Convenience and Necessity and Approval of Tariff* is true and correct to the best of his knowledge, information, and belief.



Warren Wood, Vice President
External Affairs and Communications
Union Electric Company d/b/a Ameren Missouri

Subscribed and sworn before me this 6th day of March, 2018.


Notary Public

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 7th day of March, 2018.

/s/ Wendy K. Tatro
Wendy K. Tatro