

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Ameren Missouri's)	
Application for Authorization to Suspend)	<u>File No. ET-2014-0085</u>
Payment of Certain Solar Rebates.)	Tariff No. YE-2014-0173

**LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
ORDER OF WITNESSES, ORDER OF CROSS-EXAMINATION
AND MOTION TO ACCEPT FILING OUT OF TIME**

Comes now Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri), on behalf of itself and other parties, and pursuant to the *Order Adopting Procedural Schedule* issued on October 18, 2013, states as follows:

1. On October 18, 2013, the Commission issued its *Order Adopting Procedural Schedule* (Order), which ordered the parties to file a List of Issues, Order of Cross-Examination and Order of Witnesses by November 5, 2013.

2. In response to the Order, the parties hereby file the following List of Issues, Order of Opening Statements, Order of Witnesses, and Order of Cross-Examination, in this proceeding.

I. List of Issues

1. Is accurate and reliable information available to perform the 1% retail rate impact calculation under any of the methods proposed in this case? If not, should the Commission deny Ameren Missouri's application in this case?

2. What is the proper method of calculating the 1% retail rate impact cap under Rule 4 CSR 240-20.100 (5)(B)?

3. In utilizing the method of calculating the 1% retail rate cap that the Commission determines is appropriate:

- a. What generation resources are included in the non-renewable portfolio when completing the retail rate impact calculation under Rule 4 CSR 240-20.100 (5)(B)?
 - b. Is there any basis in the statutes, regulations or Commission's Orders for excluding some or all of the costs of any existing or anticipated renewable energy resources from the ten year RES-compliant portfolio revenue requirement calculation used to determine the cap? If so, which costs?
 - c. Should the Commission make a determination in this case of whether Ameren Missouri's prudently-incurred expenditures on solar rebate payments be expensed or amortized? If yes, what determination should the Commission make?
 - d. How does a utility implement the directive in Rule 4 CSR 240-20.100 (5)(A) that the retail rate impact "...shall exclude renewable energy resources owned or under contract prior to the effective date of this rule" when it calculates the retail rate impact limit under Rule 4 CSR 240-20.100 (5)(B)?
 - e. Must an electric utility's most current adopted preferred resource plan be used for determining the renewable energy resource additions to the RES-compliant portfolio when completing the retail rate impact calculation under Rule 4 CSR 240-20.100 (5)(B)?
 - f. Should payment of solar rebates be "front-loaded" as suggested by MOSEIA?
4. What method of scaling costs of the RES-compliant portfolio should be used to achieve compliance with the 1% RRI limitation under Rule 4 CSR 240-20.100 (5)(D):

- a. Does the RES statute, Section 393.1030 et seq., or the RES Rule, 4 CSR 240-20.100 create a preference for paying solar rebates or for complying with the renewable portfolio requirements?
5. What is the one percent retail rate impact (1%) amount when calculated by the method the Commission determines in Issues 2 and 3 is the correct method?
6. Are the sums of solar rebate payments Ameren Missouri has made and those it projects to pay by the end of 2013, greater than the one percent (1%) retail rate impact amount determined in 5 above?
7. Should the Commission authorize Ameren Missouri to stop making solar rebate payments beginning no earlier than December 10, 2013, in order to comply with Section 393.1030.2 (1) and .3 RSMo (Supp. 2013) and Rule 4 CSR 240-20.100 (5)?
8. If Ameren Missouri's unconstrained payments of solar rebates for 2013 would, given its planned other RES compliance expenditures for the period 2013-2022, cause a rate impact greater than 1%, must the excess solar rebate payment amounts be carried over as a RES compliance cost for 2014 and future years, and other planned RES compliance rolled back in those future years?

II. Order of Opening Statements

1. Ameren Missouri
2. Kansas City Power & Light Company (KCPL) and KCP&L Greater Missouri Operations Company (GMO)
3. Missouri Industrial Energy Consumers (MIEC)
4. Staff
5. Public Counsel (OPC)
6. Missouri Division of Energy (MDE)
7. Missouri Solar Energy Industries Association (MOSEIA)

8. Renew Missouri
9. Brightergy, LLC (Brightergy)

III. Witness List and Order of Witnesses

Friday, November 8, 2013

A. Ameren Missouri

1. Richard Wright
2. Matt Michels

B. MOSEIA

1. Dane Glueck
2. Ezra D. Hausman

C. Staff

1. Claire Eubanks
2. Mark Oligschlaeger
3. Dan Beck

D. OPC

1. Ryan Kind

E. MIEC

1. Maurice Brubaker

F. MDE

1. Brenda Wilbers

IV. ORDER OF CROSS-EXAMINATION

The order of cross-examination is as follows:

Ameren Missouri witnesses

KCPL and GMO, MIEC, Staff, OPC, MDE, MOSEIA, Renew Missouri, Brightergy

MIEC witnesses

KCPL and GMO, Staff, OPC, MDE, MOSEIA, Renew Missouri, Brightergy, Ameren Missouri

Staff witnesses

OPC, MDE, MOSEIA, Renew Missouri, Brightergy, MIEC, KCPL and GMO, Ameren Missouri

Public Counsel witness

MDE, MOSEIA, Renew Missouri, Brightergy, KCPL and GMO, MIEC, Staff, Ameren Missouri

MDE witness

MOSEIA, Renew Missouri, Brightergy, KCPL and GMO, MIEC, Staff, OPC, Ameren Missouri

MOSEIA witnesses

Renew Missouri, Brightergy, MDE, OPC, Staff, MIEC, KCPL and GMO, Ameren Missouri

Finally, Ameren Missouri asks the Missouri Public Service Commission to accept this filing out of time. It was not possible for all parties to review and consent to this filing on November 5th. No party is harmed by this delay and all parties will still be able to file their Statements of Position yet today, as ordered.

WHEREFORE, Ameren Missouri, on behalf of itself and other parties, hereby submits the List of Issues, Order of Opening Statements, Order of Witnesses, and Order of Cross-Examination for consideration by the Commission and asks that the Commission accept the filing out of time.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261

Corporate Counsel

Thomas M. Byrne, #33340

Director & Assistant General Counsel

1901 Chouteau Avenue, MC-1310

St. Louis, MO 63166-6149

(314) 554-3484 (Telephone)

(314) 554-2514 (Telephone)

(314) 554-4014 (Facsimile)

AmerenMOService@ameren.com

Attorneys for Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 6th day of November, 2013.

/s/ Wendy Tatro

Wendy K. Tatro