

Exhibit No.:
Issue: Policy
Witness: Jamie S. Myers
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: EA-2019-0021
Date Testimony Prepared: December 20, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

REBUTTAL TESTIMONY

OF

JAMIE S. MYERS

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

CASE NO. EA-2019-0021

*Jefferson City, Missouri
December 2018*

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1 Q. Have you previously filed testimony before the Commission?

2 A. Yes. I filed testimony before the Commission in Case Numbers GR-2017-0215,
3 GR-2017-0216, GR-2018-0013, and EA-2018-0202.

4 Q. What is the purpose of your testimony?

5 A. The purpose of my testimony is to sponsor the Staff's Rebuttal Report that is
6 being filed concurrently with this testimony and provide an overview of Staff's position in this
7 proceeding.

8 Short forms used in this testimony and Staff's Rebuttal Report include:

9 "Commission" for the Missouri Public Service Commission;

10 "Staff" for the Staff of the Missouri Public Service Commission;

11 "Ameren Missouri" for Union Electric Company d/b/a Ameren Missouri;

12 "CCN" for certificate of convenience and necessity;

13 "BTA" for Build Transfer Agreement

14 Q. Please briefly describe Ameren Missouri's request.

15 A. On October 22, 2018, Ameren Missouri filed its Application seeking a CCN
16 authorizing it to construct, install, own, operate, maintain, and otherwise control and manage a
17 wind generation facility to be constructed in Atchison County, Missouri, pursuant to a build
18 transfer agreement (BTA) with the special-purpose entity, Brickyard Hills Project, LLC, which is
19 a wholly owned subsidiary of EDF-RE US Development, LLC. Ameren Missouri is also seeking
20 authority to merge the special-purpose entity into Ameren Missouri with Ameren Missouri being
21 the surviving entity.

22 Q. What is Staff's recommendation on the Application?

23 A. Based on Staff's review Staff recommends the Commission grant
24 Ameren Missouri a CCN, that does not include siting authority for any transmission upgrade or

1 component, notwithstanding the inclusion of the gen-tie line in the BTA, for the Brickyard Hills
2 project, under the specific terms of the BTA, with the following conditions:

3 A. Ameren Missouri shall file with the Commission quarterly
4 progress reports on the plans, specifications, and permit obtainment.

5 B. Ameren Missouri must receive approval from the Federal Energy
6 Regulatory Commission.

7 C. The currently ordered depreciation rate of 6.81% and net salvage
8 percentage of -17% shall be used.

9 D. Ameren Missouri will provide the full grossed-up value of PTCs
10 to customers through the Renewable Energy Standard Rate
11 Adjustment Mechanism or in rates when earned.

12 E. Ameren Missouri will include the Missouri Department of
13 Conservation (MDC) in all scheduled meetings/conference calls with
14 the United States Fish and Wildlife Service (USFWS) as well as
15 provide MDC a copy of all documents and/or reports related to the
16 Project that are provided to the USFWS.

17 F. The Total Designated Network Upgrades will be capped at
18 *** _____ *** to fully interconnect the Brickyard Hills
19 project as contemplated in the BTA and as necessary to fully comply
20 with requirements of all relevant RTOs. In the event Total Designated
21 Network Upgrades exceeds this cap, Ameren Missouri shall provide
22 an analysis comparing the increased costs with the benefits of
23 continuing the project. This analysis will be filed for the
24 Commission's consideration prior to Ameren Missouri's continuation
25 of the project.

26 G. Curtailment Sensitivity Analysis: Ameren Missouri shall include a
27 dispatch down and curtailment sensitivity analysis on all future CCN
28 applications for wind and solar projects interconnected at
29 transmission level.

1 Staff also recommends the Commission grant Ameren Missouri's request to merge the
2 special-purpose entity into Ameren Missouri, with Ameren Missouri being the surviving entity.

3 Q. How is Staff's Rebuttal Report organized?

4 A. It is organized by topic as follows:

5 I. Executive Summary

6 II. Does the Application Meet the Requirements of Commission
7 Rule 4 CSR-240-3.105?

8 III. Tartan Criteria

9 a. Whether there is a need for the facilities and service

10 b. Whether the applicant is qualified to own, operate, control
11 and manage the facilities

12 c. Whether the applicant has the financial ability for the
13 undertaking

14 d. Whether the proposal is economically feasible

15 e. Whether the facilities and service promote the public
16 interest

17 IV. In-Service Criteria

18 V. Recommended Conditions

19 Q. Does this conclude your testimony?

20 A. Yes.

**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 Convenience and)
Necessity Authorizing It to Construct a Wind)
Generation Facility)

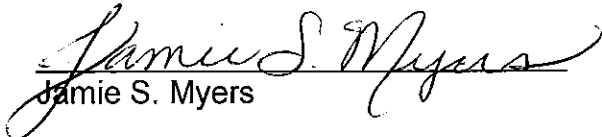
Case No. EA-2019-0021

AFFIDAVIT OF JAMIE S. MYERS

State of Missouri)
) ss
County of Cole)

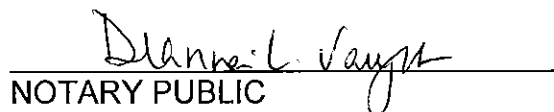
COMES NOW Jamie S. Myers, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Rebuttal Report*; and that the same is true and correct according to her best knowledge and belief.

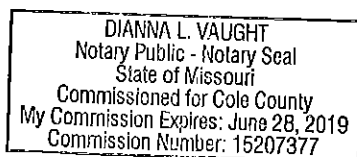
Further the Affiant sayeth not.


Jamie S. Myers

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 21st day of December, 2018.


NOTARY PUBLIC



CREDENTIALS AND CASE PARTICIPATION OF

JAMIE S. MYERS

POSITION:

Commission Staff Deputy Director

EDUCATION:

B.A. Environmental Studies, University of Missouri

J.D. University of Missouri

EXPERIENCE:

I began employment at the Commission in May 2014 in the Staff Counsel Department. I transitioned to my current position as Commission Staff Deputy Director in April 2017. Prior to my employment at the Commission, I spent four years working in education and research.

My job duties include assisting the Commission Staff Director in overseeing all aspects of the Commission Staff. Previously, I was the designated lead on the general review of the Commission's rules, pursuant to Executive Order 17-03. In my prior position at the Commission, I was the assigned attorney on several rate cases, complaints, and various applications.

TESTIMONY:

GR-2017-0215

GR-2017-0216

GR-2018-0013

EA-2018-0202