

*Exhibit No.:*  
*Issue(s):* Solar Rebate Tariff  
*Witness:* Amanda Coffey  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Direct Testimony  
*Case No.:* ER-2022-0337  
*Date Testimony Prepared:* January 24, 2023

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENGINEERING ANALYSIS DEPARTMENT**

**DIRECT TESTIMONY  
Class Cost of Service/Rate Design**

**OF**

**AMANDA COFFER**

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

**CASE NO. ER-2022-0337**

*Jefferson City, Missouri  
January 2023*

1 **DIRECT TESTIMONY OF**

2 **AMANDA COFFER**

3 **UNION ELECTRIC COMPANY,**  
4 **d/b/a AMEREN MISSOURI**

5 **CASE NO. ER-2022-0337**

6 Q. Please state your name and business address.

7 A. My name is Amanda Coffe, and my business address is Missouri Public Service  
8 Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

9 Q. Are you the same Amanda Coffe who previously filed testimony in this case?

10 A. Yes I am.

11 **SOLAR REBATE TARIFF**

12 Q. What is Ameren proposing in regards to its solar rebate tariff?

13 A. In his testimony, Ameren witness Michael Harding mentions the plan to  
14 eliminate the outdated solar rebate language in Sheet Nos. 88.9 -88.13.<sup>1</sup>

15 Q. Does Ameren currently have two solar rebate riders in its tariff?

16 A. Yes. Rider SR found in Sheet Nos. 88.9-88.13 and 88-88.8.

17 Q. What is the difference in these two riders?

18 A. Sheet Nos. 88.9-88.13 implemented the requirements in 393.1030.3. RSMo,  
19 which outlined solar rebate requirements from June 30, 2014 through June 30, 2020; and  
20 Sheet Nos. 88-88.8 implemented the requirements in 393.1670 RSMo, which outlines solar  
21 rebate requirements from January 1, 2019 through December 31, 2023.

22 Q. You previously mentioned the language in Sheet Nos. 88.9-88.13 is outdated.  
23 How is it outdated?

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<sup>1</sup> Page 14, lines 7-11.

1           A.     The purpose of the Rider SR found in Sheet Nos. 88.9-88.13 was to implement  
2 the solar rebate established through 393.1030 RSMo. Section 393.1030.3 outlined  
3 requirements for solar rebates for systems that became operational prior to June 30, 2020.  
4 After June 30, 2020 there is no requirement. The requirement states in part,

5           “The solar rebates shall be two dollars per watt for systems becoming operational on or  
6 before June 30, 2014; one dollar and fifty cents per watt for systems becoming operational  
7 between July 1, 2014, and June 30, 2015; one dollar per watt for systems becoming operational  
8 between July 1, 2015, and June 30, 2016; fifty cents per watt for systems becoming operational  
9 between July 1, 2016, and June 30, 2017; fifty cents per watt for systems becoming operational  
10 between July 1, 2017, and June 30, 2019; twenty-five cents per watt for systems becoming  
11 operational between July 1, 2019, and June 30, 2020; and zero cents per watt for systems  
12 becoming operational after June 30, 2020.”

13           Q.     With this change will Ameren still be offering solar rebates to customers?

14           A.     Yes. Ameren will still be offering solar rebates through Rider SR on tariff Sheet  
15 Nos 88-88.8 which is in effect through 2023.

16           Q.     What is your recommendation regarding this change?

17           A.     I recommend the Commission approve the elimination of the outdated solar  
18 rebate language in Sheet Nos. 88.9 -88.13.

19           Q.     Does this conclude your direct testimony?

20           A.     Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company            )  
d/b/a Ameren Missouri's Tariffs to Adjust        )  
Its Revenues for Electric Service                )            Case No. ER-2022-0337

**AFFIDAVIT OF AMANDA COFFER**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE        )

**COMES NOW AMANDA COFFER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Amanda Coffe*r; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

*Amanda Coffe*r  
\_\_\_\_\_  
AMANDA COFFER

**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 20<sup>th</sup> day of January 2023.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

*D. Suzie Mankin*  
\_\_\_\_\_  
Notary Public