

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-2019-0181
Necessity Authorizing it to Construct a Wind Generation)
Facility.)

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or the “Company”), and in compliance with ¶ 6.H of the Stipulation and Agreement (“Stipulation”) filed in this case and approved by the Commission on August 15, 2019, hereby provides this Notice and accompanying analysis, as follows:

- Transmission Interconnection: Ameren Missouri shall file with the Commission an analysis, prior to a Generation [sic] Interconnection Agreement being signed, if the total designated Network Upgrade costs and costs allocated or assigned from other upgrades or projects, exceed the amounts listed in the Staff Rebuttal Report submitted in this docket (at page 29, line 12 for each of the SPP or MISO connection options), as applicable. Such an analysis should compare the increased total designated Network Upgrade costs including potential costs allocated or assigned from other upgrades or projects, with the benefits of continuing the project.

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3. The project has now completed both the SPP and MISO transmission interconnection study processes. Based on those studies, *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]***. As indicated in the Surrebuttal Testimony of Ajay K. Arora, the Network Upgrade costs for SPP, according to the SPP transmission interconnection study results, are *** [REDACTED]*** more than for the MISO option, but as Mr. Arora noted, on a per-kilowatt basis and accounting for all costs, the SPP option is less expensive (i.e., results in a lower project purchase price for Ameren Missouri) than the MISO option).

4. The purpose of ¶ 6.H of the Stipulation was to provide the parties and the Commission information about the project's economics in the event that the Network Upgrade costs *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ***.

5. Because Ameren Missouri will not *** [REDACTED] *** a good case could be made that there is no need or purpose in performing an analysis as contemplated by ¶ 6.H of the Stipulation. However, such an analysis is exceedingly simple to complete since all that must be done is reflect the higher *** [REDACTED] *** Network Upgrade costs in the original workpapers that underlie Ameren Missouri's direct case analysis while also *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ***.

6. Submitted with this Notice are the results of that analysis, showing *** [REDACTED]

[REDACTED] ***. The analysis is reflected in three updated workpapers (all originally submitted in connection with the filing of Mr. Michels' direct testimony). The first workpaper reflects the *** [REDACTED]

[REDACTED] ***. The second workpaper, which pulls values from the first workpaper, shows *** [REDACTED]

[REDACTED] ***. The third workpaper, which pulls values from the second workpaper, shows *** [REDACTED]

[REDACTED]

[REDACTED] ***.

WHEREFORE, Ameren Missouri hereby submits the analysis required by ¶ 6.H of the Stipulation.

/s/ James B. Lowery

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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the public version of the foregoing Application has been e-mailed, this 13th day of September, 2019, to counsel of record in this docket.

/s/ James B. Lowery
James B. Lowery