

Issue(s): CCN for Brickyard Hills  
Wind Project – Opposition  
Witness: Susette Taylor  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Atchison County, Missouri  
File No.: EA-2019-0021  
Date Testimony Prepared: December 20, 2018

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. EA-2019-0021**

**DIRECT TESTIMONY**

**OF**

**SUSETTE TAYLOR, COUNTY CLERK**

**ATCHISON COUNTY, MISSOURI**

**ON BEHALF OF**

**ATCHISON COUNTY, MISSOURI**

**INTERVENOR IN CASE**

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**DIRECT TESTIMONY  
OF  
SUSETTE TAYLOR, COUNTY CLERK  
ATCHISON COUNTY, MISSOURI  
FILE NO. EA-2019-0021**

**I.     INTRODUCTION**

**Q.     Please state your name and business address.**

A.     My name is Susette Taylor and my business address is County Courthouse, Rock Port, Missouri.

**Q.     What is your position with Atchison County, Missouri.**

A.     I am the elected county clerk for Atchison County, Missouri.

**Q.     Please describe your duties and responsibilities as the elected assessor for Atchison County, Missouri.**

A.     As the county clerk for the county, I am the primary elected official whose duties include serving as the custodian of records for the Atchison County Commission, assisting with the confirmation and distribution of tax bills for the taxes assessed for real and personal property located within the political boundaries of Atchison County, Missouri, and for notifying the state authorities of the allocation of taxes and levies of the governmental entities in the county.

**Q.     What is the purpose of your testimony in this proceeding?**

A.     The purpose of my testimony is to oppose Ameren's application for a certificate of Convenience and Necessity (CCN) for a wind generation project that is located in Atchison County, Missouri, and in support of preserving the taxes assessed and collected from the company who currently owns the wind tower project that is the subject of this proceeding. I am

1 also opposing the merger of the non-Public Service Commission regulated wind project owner  
2 with Ameren which is a regulated entity under the jurisdiction of the Public Service  
3 Commission.

## 4 **II. COUNTY COMMISSION'S ACTIONS**

5 After review of the County Commission's records, I testify that the Atchison County  
6 Commission has not granted any tax relief or any tax reductions as of the date of this testimony  
7 to any entity engaged in the development of wind energy in behalf of Ameren or any  
8 organization associated with Ameren in any way.

9 After review of the County Commission's records, I testify that the Atchison County  
10 Commission has not granted any entity or Ameren any assent under Sec. 229.100 RSMo to cross  
11 county roads for any purpose related to the development and operation of wind towers.

12 After review of the County Commission's records, I testify that the Atchison County  
13 Commission has not granted any permission to assign any interest in any economic development  
14 agreement with any wind power development entity to Ameren.

15 After review of the County Commission's records, I testify that the Atchison County  
16 Commission has not granted Ameren any permission of any type to construct, operate, or  
17 otherwise engage in the development of wind power energy or related projects in Atchison  
18 County.

19 After review of the County Commission's records, I testify that the Atchison County  
20 Commission has not entered into any economic development agreement that involves Ameren.

21 From my years of experience in county government in Atchison County, I testify that if  
22 the Public Service Commission allows Ameren to prevail in its application, the taxing districts in  
23 Atchison County will lose all of the local tax revenues that support all of the governmental

1 services provided in the county, including road and bridge construction and maintenance,  
2 educational programs of the school districts, the providing of emergency services such as those  
3 provided by ambulance and fire districts, and health care services to citizens of Atchison County.

4 If Ameren prevails in its application there will be very little appreciable local taxes  
5 collected and used in Atchison County, and the taxes applicable to Ameren assessed through the  
6 State Tax Commission will be distributed throughout other counties in Missouri that have  
7 Ameren presence.

8 I testify that the spreadsheet attached hereto and made a part of my testimony was created  
9 at my direction to show the loss of tax revenues if Ameren prevails in this process. See Atchison  
10 Exhibit 1.

### 11 **III. SUMMARY AND CONCLUSIONS**

12 From the information that I have from the information provided to this Commission by  
13 Ameren and the data that I have as the Atchison County Clerk, the only advantage of the  
14 approval of the application is to reduce Ameren's tax rate. The great disadvantage of the  
15 approval of the application is to deprive the citizens and taxing entities of Atchison County of the  
16 tax revenues that will be paid by the developer of the wind power project as an unregulated  
17 entity that will be avoided if Ameren's application is granted and the wind power project is  
18 transferred to Ameren as an entity under the jurisdiction of the Public Service Commission.

19 There will be no more electric power generated if the application is granted than if it is  
20 denied. There will be no more wind towers built. From this testimony and the record provided  
21 by Ameren, it can be concluded that great harm will be inflicted on the citizens of Atchison  
22 County if the application is granted. No harm will be placed on Ameren and certainly there is  
23 no necessity to gain the desired electric power of Ameren because Ameren can just as easily

1 purchase the power generated by the wind towers owned by the non-regulated owner as it can  
2 generate the power as if it owned the towers. The difference is in taxation, not availability of  
3 power to help Ameren meet its energy needs in compliance with the law and to meet its  
4 customers' energy needs.

#### 5 **IV. RELIEF REQUESTED**

6 The Public Service Commission should deny Ameren's application for Certificate of  
7 Necessity and Need because Ameren has not proven that there is a need for Ameren to own the  
8 wind power project in order to obtain the electric power that it asserts it needs to serve its  
9 customers. When balancing the public good produced by local taxation by local taxing districts  
10 against the lack of benefit to the public by Ameren's application and the losses to the citizens of  
11 Atchison County, it is clear that the application must be denied.

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

File No. EA-2019-0021

**AFFIDAVIT OF SUSETTE TAYLOR**

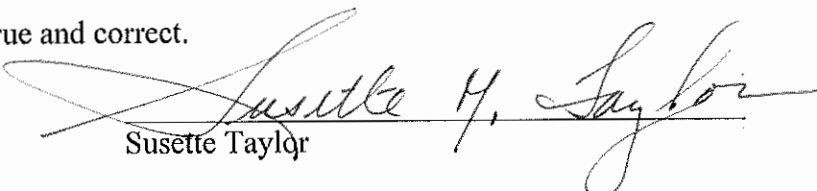
STATE OF MISSOURI                     )  
                                                      ) ss  
COUNTY OF ATCHISON                )

Susette Taylor, being first duly sworn on his oath, states:

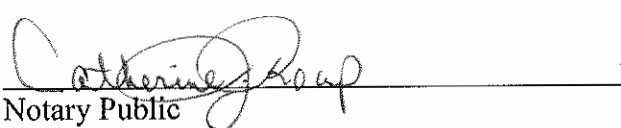
1. My name is Susette Taylor. I work in the County of Atchison, Missouri and I am employed by Atchison County as the duly elected County Clerk.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Atchison County, Missouri consisting of six (6) pages and one (1) exhibit, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

  
Susette Taylor

Subscribed and sworn to before me this 20<sup>th</sup> day of December, 2018.

  
Notary Public

My commission expires:

