

**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)
Approval of a Subscription-Based)
Renewable Energy Program.) **File No. EA-2022-0245**

**JOINTLY PROPOSED LIST OF ISSUES, ORDER OF OPENING STATEMENTS,
LIST AND ORDER OF WITNESSES, AND ORDER OF CROSS-EXAMINATION**

COMES NOW, the Staff of the Missouri Public Service Commission, on behalf of itself and the parties to this docket, and hereby submits its proposed *List of Issues, Order of Opening Statements, List and Order of Witnesses, and Order of Cross-Examination* in accordance with the Procedural Schedule set for the above-captioned proceeding. With respect to the list of issues, the *list* is joint. The inclusion of an issue, however, in the list does not mean that all parties jointly agree that the matter identified is actually in dispute and/or that a Commission decision on the issue is proper or necessary in this case.

I. List of Issues

A. Does the evidence establish that the 150 megawatt (“MW”) solar generation facility to be constructed in White County, Illinois (the “Boomtown Solar Project” or “Project”) for which Ameren Missouri is seeking a certificate of convenience and necessity (“CCN”) necessary or convenient for the public service??

1. Should the Commission find that the Project satisfies the first *Tartan* Factor of need?
2. Should the Commission find that the Project satisfies the second *Tartan* Factor of economic feasibility?
3. Should the Commission find that the Project satisfies the third *Tartan* Factor of ability to finance?

4. Should the Commission find that the Project satisfies the fourth *Tartan* Factor of qualified to construct?
 5. Should the Commission find that the Project is in the public interest and satisfies the fifth *Tartan* Factor?
- B. If the Commission grants the CCN for the Boomtown Solar Project, what conditions, if any, should the Commission impose on the CCN?
- C. Is this an appropriate proceeding for the Commission to review Ameren Missouri's Renewable Solutions Program?
1. If so, should the Commission approve the Renewable Solutions Program proposed by Ameren Missouri [in accordance with its authority to approve utility programs and tariffs?](#)
- D. If the Commission approves the Renewable Solutions Program proposed by Ameren Missouri, what, if any, conditions should the Commission impose on such approval?

II. Order of Opening Statements

Ameren Missouri
Missouri Industrial Energy Consumers
Wal-Mart
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

III. List and Order of Witnesses

Arora (Ameren Missouri)
Michels (Ameren Missouri)
Granowski (Ameren Missouri)
Dixon (Ameren Missouri)
Forsberg (Ameren Missouri)
Wibbenmeyer (Ameren Missouri)

Wills (Ameren Missouri)
Brubaker (MIEC)
Schuerman (MIEC)
Teague (Wal-Mart)
Shenstone-Harris (Sierra Club)
Owen (Renew)
Marke (OPC)
Lange (Staff)
Forston (Staff)
Stahlman (Staff)
Cunigan (Staff)
Dhority (Staff)
Hull (Staff)
Won (Staff)
Luebbert (Staff)

IV. Order of Cross-Examination

Ameren Missouri Witnesses

Missouri Industrial Energy Consumers
Wal-Mart
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

Missouri Industrial Energy Consumers Witness

Ameren Missouri
Wal-Mart
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

Wal-Mart Witness

Ameren Missouri
Missouri Industrial Energy Consumers
Sierra Club
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

Sierra Club Witness

Ameren Missouri
Missouri Industrial Energy Consumers
Wal-Mart
Renew Missouri
Office of Public Counsel
Staff of the Missouri Public Service Commission

Renew Missouri Witness

Ameren Missouri
Missouri Industrial Energy Consumers
Wal-Mart
Sierra Club
Office of Public Counsel
Staff of the Missouri Public Service Commission

Office of Public Counsel Witness

Staff of the Missouri Public Service Commission
Wal-Mart
Sierra Club
Renew Missouri
Missouri Industrial Energy Consumers
Ameren Missouri

Staff of the Missouri Public Service Commission Witnesses

Office of Public Counsel
Wal-Mart
Sierra Club
Renew Missouri
Missouri Industrial Energy Consumers
Ameren Missouri

Respectfully submitted,

/s/ Paul T. Graham

Senior Counsel Missouri Bar No. 30416
Attorney for the Staff of the Missouri Public
Service Commission
P. O. Box 360 Jefferson City, MO 65102
(573) 522-8459 (Telephone)
(573) 751-9285 (Fax)
paul.graham@psc.mo.gov

CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on January 24, 2023, he filed the above document in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham