

**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	)	<b><u>Case No. EA-2020-0371</u></b>
Permission and Approval and a Certificate of	)	Tracking No. YE-2022-0259
Public Convenience and Necessity Under	)	
20 CSR 4240-3.105	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and for its *Staff Recommendation* recommending approval of the tariff states as follows:

1. On May 16, 2022, Union Electric Company d/b/a Ameren Missouri filed a revised tariff sheet, YE-2022-0259, to update its Solar Generation Charge and Total Solar Block Charge in its Community Solar Pilot Program to reflect the Montgomery County Energy Center. The original proposed effective date of that tariff was June 16, 2022.

2. The Commission ordered Staff's recommendation and any response or objection to be filed no later than May 27, 2022. On May 27, 2022, Staff filed its *Motion For Extension On Staff Recommendation And Fifteen-Day Suspension Of Tariff*, requesting suspension of the tariff sheet, and additional time to review the case and the in-service information Ameren Missouri to Staff on May 26, 2022.

3. On June 8, 2022, the Commission issued its *Order Suspending Tariff Sheet And Granting Extension Of Time*, suspending the tariff until July 16, 2022, granting Staff's extension request, moving the date for Staff's recommendation to June 23, 2022, and parties' responses to Staff to June 30, 2022.

4. As discussed in the attached memorandum, Staff utilized the agreed-upon in-service criteria, filed by parties on July 17, 2021,<sup>1</sup> to review the in-service information provided. Staff determined the Montgomery County Energy Center meets the fully operational and used for service standard in Section 393.135, RSMo (2016). Staff also reviewed the tariff sheet, P.S.C. MO. No. 6 1st Revised Sheet No. 158.4 and recommends it be approved for service on or after July 16, 2022.

**WHEREFORE**, Staff respectfully requests the Commission find the Montgomery County Energy Center fully operational and used for service according to the standards in Section 393.135, RSMo (2016) and the parties' agreed upon in-service criteria, and further requests the Commission approve the tariff for service on or after July 16, 2022.

Respectfully submitted,

**/s/ Nicole Mers**

Nicole Mers

Deputy Counsel

Missouri Bar No. 66766

P.O. Box 360

Jefferson City, MO 65012

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

Nicole.mers@psc.mo.gov

**Attorney for the Staff of the  
Missouri Public Service Commission**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 23rd day of June, 2022.

**/s/ Nicole Mers**

---

<sup>1</sup> *Ameren Missouri's Notice of Compliance with Conditions a and c from Commission's CCN Order*, Case No. EA-2020-0371, EFIS Document Number 25 (July 16, 2021).

## **MEMORANDUM**

**TO:** Missouri Public Service Commission Official Case File Case No. EA-2020-0371 and  
Tariff Tracking YE-2022-0259

**FROM:** Cedric Cunigan, P.E., Engineering Analysis Department

/s/ Cedric E. Cunigan, P.E. / June 23, 2022  
Professional Engineer  
Engineering Analysis /Date

/s/ Nicole Mers / June 23, 2022  
Staff Counsel's Office / Date

**SUBJECT:** Staff Recommendation to Approve Revised Tariff Sheet Tracking, No. YE-2022-0259

**Date:** June 23, 2022

### **OVERVIEW**

On May 16, 2022, Union Electric Company d/b/a Ameren Missouri (“Ameren” or “the Company”) filed a revised tariff sheets bearing an issue date of May 16, 2022 and a 30-day effective date of June 16, 2022. On May 17, 2022, the Commission issued its Order Setting Time for Responses and Directing Staff Recommendation. Staff’s recommendation was due to be filed no later than May 27, 2022. Staff filed its Motion for Extension on Staff Recommendation and Fifteen-Day Suspension of Tariff on May 27, 2022, which requested a 30 day extension of the report to June 26, 2022 and a 15 day suspension of the tariff to July, 1, 2022. Ameren filed a response on June 3, 2022 stating they did not object to Staff’s request. On June 8, 2022, the Commission issued its Order Suspending Tariff Sheet and Granting Extension of Time, which ordered Staff to file its recommendation no later than June 23, 2022 and suspended the tariff until July 16, 2022.

### **BACKGROUND**

Ameren Missouri’s Community Solar Program was initially approved in Case No. EA 2016-0207. The initial facility was the Lambert Solar Energy Center. In Case No. ET-2020-0022 the Commission approved an expansion of the Community Solar Subscriber pilot program. Ameren Missouri is filing this tariff revision to update program charges related to the completion of the Montgomery County Community Solar Energy Center (“Montgomery Solar”). The Solar Generation charge will decrease from \$10.78 to \$8.51 and the Total Solar Block Charge for Small General Service Will decrease from \$13.26 to \$10.99.

The Commission granted Ameren Missouri a Certificate of Convenience and Necessity for the Montgomery County Community Solar Energy Center (“MCCSC”) in EA-2020-0371. As a part of EA-2020-0371, Staff and Ameren Missouri agreed to in-service criteria which will be used to evaluate whether Montgomery Solar facility is fully operational and used for service. The criteria are as follows:

1. All major construction work is complete.
2. All preoperational tests have been successfully completed.
3. Facility successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.
4. Upon observation of the facility for 72 consecutive hours, the facility will have demonstrated that when sunlight was shining on it during that period it produced power in a standard operating mode.

5. Facility shall meet at least 95% of the guaranteed capacity (in MW AC) based on the Capacity Test in Attachment 1. The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions.
6. Sufficient transmission/distribution interconnection facilities shall exist for the total plant design net electrical capacity at the time the facility is declared fully operational and used for service.
7. Sufficient transmission/distribution facilities shall exist for the total plant design net electrical capacity into the utility service territory at the time the facility is declared fully operational and used for service.

Staff received the in-service documentation on May 26, 2022. This documentation included the MCCSC Substantial Completion Certificate, MCCSC Punchlist, Inverter 1 hot and cold commissioning checklists, Inverter 2 hot and cold commissioning checklists, Montgomery Capacity Verification Datasheet, Burns & McDonnell Test Calculations Submittal, Solar Phase II PV Connection study – Rev 3 ,and Trina Commissioning Acceptance Certificate. Staff did not perform a site visit to the facility after substantial completion, but reviewed the above information and found it satisfied the in service criteria. Staff recommends the Commission find MCCSC fully operational and used for service as of March 22, 2022.

The Solar Generation charge will decrease from \$10.78 to \$8.51 and the Total Solar Block Charge for Small General Service Will decrease from \$13.26 to \$10.99.

#### **STAFF RECOMMENDATION**

Staff has reviewed tariff sheets submitted by Ameren Missouri in Tariff Tracking No. YE-2022-0259 on May 16, 2022, and recommends that the Commission approve the following sheets to take effect by the proposed effective date of July 16, 2022:

MO. P.S.C. No. 6

---

1<sup>st</sup> Revised Sheet No. 158.4

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its 2021 Annual Report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

