

Exhibit No.:
Issue(s): Solar Rebates
Witness: Richard Wright
Sponsoring Party: Union Electric Company
Type of Exhibit: Surrebuttal Testimony
Case No.: ET-2014-0085
Date Testimony Prepared: November 1, 2013

MISSOURI PUBLIC SERVICE COMMISSION

Case No. ET-2014-0085

SURREBUTTAL TESTIMONY

OF

RICHARD WRIGHT

ON

BEHALF OF

**UNION ELECTRIC COMPANY
d/b/a AmerenUE**

**St. Louis, Missouri
November 1, 2013**

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **RICHARD WRIGHT**

4 **CASE NO. ET-2014-0085**

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

6 A. Richard Wright, One Ameren Plaza, 1901 Chouteau Avenue, St. Louis,
7 Missouri 63103.

8 **Q. Are you the same Richard Wright who filed direct testimony in this case?**

9 A. Yes, I am.

10 **Q. What is the purpose of your surrebuttal testimony?**

11 A. The purpose of my surrebuttal testimony is to respond to portions of the
12 rebuttal testimony filed by Missouri Solar Energy Industries Association (MOSEIA) witness
13 Dane Glueck.

14 **Q. Mr. Glueck testified that customers will be negatively impacted if the**
15 **Missouri Public Service Commission (Commission) were to find that Ameren Missouri**
16 **has reached the retail rate impact (RRI) limitation. Do you believe the suspension of**
17 **solar rebates will harm customers who install solar facilities?**

18 A. I am not sure if it will cause harm but I do understand that it can cause
19 confusion and uncertainty. Ameren Missouri is not privy to the contracts between a
20 customer and a solar developer. Any financial harm to the Company's customer would be
21 directly related to how the agreement between the customer and the solar developer is
22 structured. Ameren Missouri has and is attempting to provide interested customers with the
23 information necessary to provide them with a better understanding of this filing and how it

1 may impact the payment of solar rebates. I would also note that regardless of Mr. Glueck's
2 concerns, when the RRI limit is reached, neither the Company nor the Commission has any
3 choice under the renewable energy standard (RES) statute but to suspend the rebates. That
4 reality reflects the policy in the RES statute to balance the benefits of solar rebates to
5 customers who desire to install solar panels and the interests of customers as a whole who
6 ultimately pay rates that reflect the subsidy those rebates provide customers who install solar
7 panels.

8 **Q. What steps has Ameren Missouri undertaken to communicate about this**
9 **filing to its customers who are installing solar panels?**

10 A. As I stated, we recognize that the Company's application to stop paying solar
11 rebates may cause confusion for our customers, especially for those considering or actually
12 installing solar panels on their residence or business. To help limit solar customer confusion
13 associated with the solar rebate suspension filing, Ameren Missouri provided several
14 notifications:

15 1. First, for customers who had received net metering and design
16 approval from Ameren Missouri prior to the filing of this case, the Company provided
17 notification, via email or letter, that solar rebate funds are committed to their
18 approved net metering application/design. This notification was provided to
19 approximately 508 customers.

20 2. For customers who submitted net metering applications prior to the
21 filing of this case but before Ameren Missouri had approved the application and
22 design, we provided notification of the solar rebate suspension filing and advised

1 these customers that rebates cannot be guaranteed for their solar project. This
2 notification was provided to approximately 201 customers.

3 3. Customers that submit new applications are notified that we have
4 received their application, are given information on the solar rebate suspension filing
5 and are advised that rebates cannot be guaranteed for their solar project.

6 4. On the day that Ameren Missouri made the initial filing in this case, I
7 contacted Heidi Schoen, MOSEIA Executive Director, to discuss the filing and to let
8 them know of the customer notifications that would be sent to our customers. We
9 provided copies of the notifications to Ms. Schoen and she agreed that there was
10 value for MOSEIA to also send copies of these notifications to their members.

11 5. Also on the day of the filing, we contacted the five most active solar
12 developers in our territory and discussed the solar rebate suspension filing with them.

13 6. Finally, the Company added a notification statement to its Net
14 Metering and Solar Rebate website pages with information on the solar rebate
15 suspension filing and included on the website a notice stating that rebates cannot be
16 guaranteed for solar projects. A copy of that notification is attached to this testimony
17 as Schedule RW-S1.

18 **Q. Did Ameren Missouri advise customers and solar developers of the risk of**
19 **rebates not being paid prior to the filing of the application in this case?**

20 A. We have. We have always advised solar developers in our area (and
21 customers, when they would call to inquire) that there is risk for them to move ahead with
22 equipment and system installation prior to our approval of their net metering application and

1 design. Also, the Company's net metering tariff, in the solar rebate application section, and
2 as required by the Commission's regulations, includes the following language:

3 I understand that this program has a limited budget, and
4 that application will be accepted on a first-come, first-
5 served basis, while funds are available. It is possible that I
6 may be notified I have been placed on a waiting list for the
7 next year's rebate program if funds run out for the current
8 year. This program may be modified or discontinued at any
9 time without notice from Company.

10
11 **Q. Does the Commission's order in this case play a role in communicating to**
12 **customers about the availability of solar rebates?**

13 A. Absolutely. I agree with Mr. Glueck's statement that nearly every customer
14 who installs solar generation does so, at least in part, because of the ability to receive a solar
15 rebate. This case inherently causes uncertainty around that issue. However, some of that
16 uncertainty can be offset. A Commission decision which clearly rules on how the RRI
17 calculation is to be performed and that clearly establishes the solar rebates that can be paid
18 without exceeding the RRI limitation would go a long way to providing clarity on this issue.
19 Ameren Missouri witness Matt Michels addresses these RRI limitation issues in his
20 testimony. Without knowing how the RRI calculation is to be done, the Company cannot
21 determine the maximum amount for solar rebates. Without knowing the solar rebate limit,
22 the Company and customers cannot know how close we are to meeting that limit, creating
23 long term customer uncertainty. Once those decisions are made, Ameren Missouri, and all
24 participants in this case, will have concrete information to convey to customers who are
25 considering the installation of solar generation.

26 **Q. Does this conclude your surrebuttal testimony?**

27 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) Case No. ET-2014-0085
Rebate Suspension)

AFFIDAVIT OF RICHARD WRIGHT

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Richard Wright, being first duly sworn on his oath, states:

1. My name is Richard Wright. I am employed by Union Electric Company d/b/a Ameren Missouri as Managing Supervisor, Renewable Energy.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Union Electric Company, d/b/a Ameren Missouri, consisting of 4 pages (and Schedules ^{RW-S1} through ^{N/A} if any), 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.



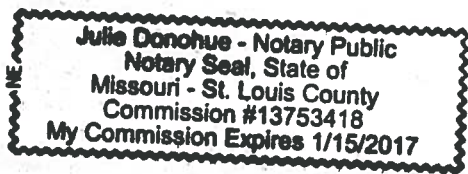
Richard Wright

Subscribed and sworn to before me this 31st day of October, 2013.



Notary Public

My commission expires: 1/15/2017



Missouri Net Metering

Solar Rebate Suspension Requested by Ameren Missouri

On Oct. 11, 2013, Ameren Missouri filed with the Missouri Public Service Commission (MPSC) to suspend solar rebate payments because it anticipated it would reach the maximum amount of renewables expenditures it is permitted to make under Missouri law. Depending on the MPSC's decision in response to this filing, which will be decided no later than Dec. 11, rebates cannot be guaranteed for your solar project.

Please view the [Notifications](#) page to see additional messages on program changes impacting Solar Rebates and Net Metering.



The [Missouri Public Service Commission](#) defines a net metering customer as an individual who uses his/her own renewable system to generate a portion or all of his/her electricity. Generation in excess of what is used by a customer is distributed on the electric grid. At the end of each monthly billing period, the amount of electricity that is sent onto the grid offsets the electricity consumed by the net metering customer, thus lowering the customer's electric bill.

- [Factors to Consider Before Starting a Renewable Energy Project](#)

Ameren Missouri offers net metering to our customers. Use the links below to learn more about the Missouri Net Metering process.

- [Net Metering Application/Agreement and Solar Rebate Application](#)
- [Net metering two-step application process](#)
- ["Sample" net metering application supporting documentation](#)

For more information on Ameren Missouri's net metering, contact licosgrove@ameren.com.

Find information on [Illinois net metering](#).

Notifications about Ameren Missouri's solar rebate program

Solar Rebate Suspension Requested by Ameren Missouri (Effective 10/11/2013)

On Oct. 11, 2013, Ameren Missouri filed with the Missouri Public Service Commission (MPSC) to suspend solar rebate payments because it anticipated that it would reach the maximum amount of renewables expenditures it is permitted to make under Missouri law. Depending on the MPSC's decision in response to this filing, which will be decided no later than Dec. 11, rebates cannot be guaranteed for your solar project.

- ✦ **Solar Rebate Program Changes (Effective 8/28/2013)**
- ✦ **Solar Rebate Phase-out Application Deadlines (Effective 8/28/2013)**
- ✦ **Requirements for a Net Metering/Solar Rebate application to be approved by Ameren Missouri**
- ✦ **Solar Rebate Phase-out Installation and Final Documentation Deadlines (Effective 8/28/2013)**

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Rebates & Funds for Solar Energy Projects

Programs available in Missouri

Notifications

Solar Rebate

Loan Program

Tax Deduction

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Ameren's Solar Rebate Program

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Ameren Missouri customers can receive a rebate for up to 25 kilowatts of solar generation.

To be eligible, you must be an Ameren Missouri customer in good standing and be using a system installed on your property after Jan. 1, 2010.

Learn more about the Ameren Missouri Rebate Program:

- [Missouri Solar Rebate Tariff Information](#)
- [Net Metering Application/Agreement and Solar Rebate Application](#)
- [Taxpayer Information Form](#)
- [Individual Customer Affidavit](#)
- [Business Customer Affidavit](#)

Please view the [Notifications](#) page to see messages from Ameren on program changes including those related to legislative changes to the Missouri Renewable Energy Standard impacting Solar Rebates and Net Metering.

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