

Exhibit No.:
Issue: *Alternative Site Studies*
Witness: *John P. Cassidy*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Cross-Surrebuttal Testimony*
Case No.: *EA-2012-0281*
Date Testimony Prepared: *September 13, 2013*

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

UTILITY SERVICES

CROSS-SURREBUTTAL TESTIMONY

OF

JOHN P. CASSIDY

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. EA-2012-0281

Jefferson City, Missouri
September 2013

**** Denotes Highly Confidential Information ****

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1 **CROSS-SURREBUTTAL TESTIMONY**

2 **OF**

3 **JOHN P. CASSIDY**

4 **UNION ELECTRIC COMPANY,**
5 **d/b/a AMEREN MISSOURI**

6 **CASE NO. EA-2012-0281**

7 Q. Please state your name and business address.

8 A. John P. Cassidy, 111 North 7th Street, Suite 105, St. Louis, MO 63101.

9 Q. By whom are you employed and in what capacity?

10 A. I am employed by the Missouri Public Service Commission (“Commission”
11 or “PSC”) as a Utility Regulatory Auditor V.

12 Q. Did you file rebuttal testimony in this proceeding on May 31, 2013?

13 A. Yes.

14 Q. Why are you filing cross-surrebuttal testimony?

15 A. I am providing Staff’s response to the Commission’s directive in its Order
16 Revising Procedural Schedule issued on August 14, 2013, that the parties “address the
17 question of whether any other studies, reports, or other documents examining alternative sites,
18 options, or possibilities exist” and provide them if they do because “[t]estimony at the local
19 public hearings raised the question of whether Ameren Missouri fully studied alternative
20 locations for the disposal of coal ash from the Labadie plant.”

21 Q. Did Ameren Missouri, or anyone else, study potential landfill sites other than
22 the one for which it is seeking a certificate of convenience and necessity in this case?

23 A. Yes. Ameren Missouri engaged the services of Reitz & Jens
24 Consulting Engineers (“R&J”) to review and study alternatives for disposal of

1 coal combustion residuals (“CCR’s”). R&J completed a study for Ameren Missouri which
2 examined 22 possible sites around the region. Ameren Missouri relied upon this study in
3 forming its decision to locate a utility waste landfill (“UWL”) adjacent to the coal-fired
4 Labadie Energy Center.

5 Q. Did Ameren Missouri, or anyone else, study other options or other possibilities
6 than landfills to dispose of coal combustion residuals generated by its Labadie coal-fired
7 Energy Center?

8 A. The Staff is not aware of any such studies examining alternatives to landfills
9 for this purpose.

10 Q. Has the Staff already provided any UWL study documents in this case?

11 A. Yes. On May 31, 2013, in this proceeding I provided a copy of a study by
12 R&J which is attached as Schedule 3 to my rebuttal testimony. Ameren Missouri provided
13 that study to Staff in its response to Staff Data Request No. 2. In that study R&J reviewed
14 alternatives for disposal of CCR’s generated by the Labadie coal-fired Energy Center.

15 Q. Does Staff possess any other UWL study documents?

16 A. Yes. Staff obtained Appendix A to the R&J study referenced on page 6 of
17 the study which is page 7 of 11 of Schedule 3, attached to my rebuttal testimony.
18 Ameren Missouri provided Staff a copy of Appendix A in response to Staff Data Request
19 No. 2.4. This appendix provides estimated costs to develop a UWL constructed as an
20 “above grade” landfill and to construct a landfill in an abandoned quarry. Each alternative
21 was studied for siting at each of the four existing Ameren Missouri coal-fired energy centers
22 (Labadie, Rush Island, Sioux and Meramec) as well as in a single location to accept ash from

1 all four coal-fired energy centers. A copy of Appendix A to the R&J study is labeled
2 “Schedule 4” and attached to this testimony.

3 As part of its response to Staff Data Request No. 2 Ameren Missouri provided a chart
4 and a power point presentation that R&J created. The chart summarizes information that R&J
5 evaluated with regard to 22 potential UWL sites. A copy of this chart (format modified to
6 attach) is labeled “Schedule 5” and attached to this testimony. The power point presentation
7 addresses some specific UWL siting requirements and covers the same 22 potential UWL
8 sites as the R&J chart. This power point presentation also explains which sites that were
9 eliminated from consideration. A copy of this power point presentation is labeled
10 “Schedule 6” and is attached to this testimony.

11 Q. Does this conclude your cross-surrebuttal testimony in this proceeding?

12 A. Yes, it does.

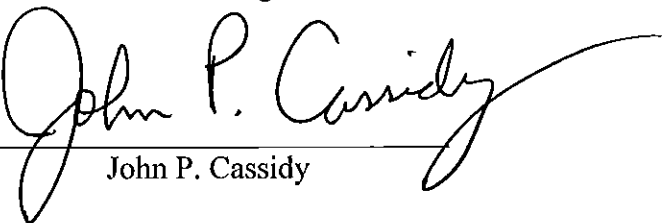
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for) Case No. EA-2012-0281
Permission and Approval and a Certificate of)
Public Convenience and Necessity Authorizing)
it to Construct, Install, Own, Operate, Maintain)
and Otherwise Control and Manage A Utility)
Waste Landfill and Related Facilities at its)
Labadie Energy Center)

AFFIDAVIT OF JOHN P. CASSIDY

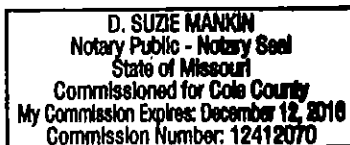
STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

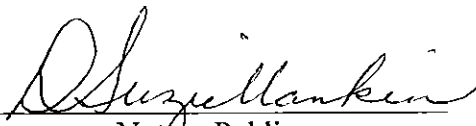
John P. Cassidy, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Cross-Surrebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Cross-Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.



John P. Cassidy

Subscribed and sworn to before me this 13th day of September, 2013.





Notary Public

SCHEDULE 4, 5 and 6

HAS BEEN DEEMED

HIGHLY CONFIDENTIAL

IN ITS ENTIRETY