

Exhibit No.:  
Issue(s): CCN  
Witness: Scott J. Wibbenmeyer  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Union Electric Company  
File No.: EA-2020-0371  
Date Testimony Prepared: October 28, 2020

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. EA-2020-0371**

**DIRECT TESTIMONY**

**OF**

**SCOTT J. WIBBENMEYER**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**d/b/a Ameren Missouri**

**\*\*DENOTES CONFIDENTIAL INFORMATION\*\***

**St. Louis, Missouri**

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**DIRECT TESTIMONY**  
**OF**  
**SCOTT WIBBENMEYER**  
**FILE NO. EA-2020-0371**

**I. INTRODUCTION**

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

A. Scott J. Wibbenmeyer, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

**Q. By whom are you employed, and what is your position?**

A. I am employed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") as Director, Renewable and Technology Business Development.

**Q. Please describe your educational background and employment experience.**

A. I hold a Bachelor of Science in Mechanical Engineering from the University of Missouri – Columbia. I also hold a Masters of Business Administration from the University of Missouri – St. Louis. I joined Ameren Missouri in 1999. In my roles at Ameren, I have served as a design engineer at the Callaway Energy Center managing projects to improve efficiency and reliability at the nuclear facility. Following Callaway, my roles included engineering management responsibilities for maintenance, production and turbine operations for Ameren Missouri’s fossil generation fleet. I was then promoted to General Executive of Coal Operations where I managed the coal and rail supply contracts

1 for Ameren. In 2007, I transferred to the renewable development organization; where I led  
2 the development of biomass, wind and solar projects including the design and construction  
3 of Ameren Missouri's Maryland Heights Renewable Energy Center, which converts  
4 landfill gas to energy, and O'Fallon Renewable Energy Center, which is a 5.7 mega-watt  
5 photovoltaic solar facility. In 2015, I transitioned to Insurance Risk Management where I  
6 was responsible for managing Ameren's financial risk and insurance portfolios. In 2019, I  
7 returned to renewables and now lead the renewable development organization as Director,  
8 Renewable and Technology Business Development.

9 **Q. What are your responsibilities in your current position?**

10 A. I am currently responsible for leading the development of renewable  
11 generation projects to comply with the Missouri Renewable Energy Standard, reliable and  
12 affordable transition of Ameren Missouri's generation portfolio, and development of  
13 customer renewable energy solutions.

14 **II. PURPOSE OF TESTIMONY**

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

16 A. The purpose of my direct testimony is to support the approval of Ameren  
17 Missouri's application for a Certificate of Convenience and Necessity ("CCN") in order to  
18 construct, own, operate and maintain a solar generation plant and associated facilities (the  
19 "Project") to fulfill the customer demand for the expansion of the Community Solar pilot  
20 program (the "Program"). My direct testimony addresses the technical details of the  
21 Project. Ameren Missouri witness Annemarie Nauert is filing direct testimony outlining  
22 the customer demand for the Program and need for the Project.

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**III. PROJECT DESCRIPTION**

**Q. Please provide an overview of the proposed Project and estimated costs.**

A. A CCN is being requested to construct a ground-mounted, single-axis tracking photovoltaic solar generation plant and associated facilities (together the "Project") of approximately 6.16 megawatts (MW-AC) producing approximately 9,500 Program blocks. Each block is 100 kilowatt-hours. The Project will interconnect to Ameren Missouri's 34.5 kilovolt ("kV") distribution system presently located at the site. The Project will be constructed in accordance with a final version of the specification attached to the CCN application as Schedule D. The total cost of the Project is expected to be approximately \*\*\_\_\_\_\_\*\*.

**Q. Where will the Project be located?**

A. The Project will be located on approximately 55 acres of the 91 acres of agriculture land presently owned by Ameren Missouri in Montgomery County, Missouri. The site address is 651 Booneslick Road, New Florence, Missouri 63363. The site was selected for multiple reasons that ultimately increase value and lower risk of the Project including: visibility to the public; favorable topography and distribution interconnection; site is owned by Ameren Missouri; and strong community support that includes the approval of a conditional use permit from Montgomery County.

**Q. When is the projected date for start of construction, and what is the anticipated date the Project will be operational and used for service?**

A. Construction is anticipated to begin in April of 2021, pending the approval of the requested CCN, and the Project is expected to be fully operational by October 2021.

1           **Q.     Are any permits required for this Project?**

2           A.     Yes. The Project requires a Conditional Use Permit ("CUP") from  
3 Montgomery County, Missouri Planning and Zoning and a land disturbance permit from  
4 the Missouri Department of Natural Resources. On December 18, 2014, Ameren Missouri  
5 received the CUP, which is attached as Schedule SJW-D1. Ameren Missouri expects to  
6 apply for the land disturbance permit upon completion of the design and prior to start of  
7 construction. A land disturbance permit is typically only applied for just prior to the  
8 commencement of construction.

9           **Q.     Please describe how Ameren Missouri expects to execute the design,**  
10 **procurement and construction of the Project.**

11          A.     Ameren Missouri expects a majority of all work required for the Project to  
12 be performed under a single Engineering, Procurement and Construction ("EPC") contract  
13 as described in the confidential procurement plan submitted as Schedule F to the CCN  
14 Application. Beyond the EPC contract, final meter installation and distribution  
15 interconnection is expected to be self-performed by Ameren Missouri. On August 4, 2020,  
16 a request for proposal was issued seeking competitive bids for the EPC contractors.  
17 Ameren Missouri received numerous proposals on September 11, 2020 and is presently in  
18 the process of negotiating contract terms with the selected vendor, with an executed  
19 contract expected in late November 2020.

20          **Q.     Are there any utilities the Project expects to cross during the course of**  
21 **construction?**

22          A.     The Norfolk Southern Railroad operates along the northern boundary of the  
23 property; however, this Project will not cross or interfere with the rail right-of-way. In

1 addition, there is a fiber telecommunication line within Booneslick road right-of-way along  
2 the south side of the property. This Project will have an entrance driveway to the site that  
3 will cross over this line, but is not expected to interfere with the line. Additional details of  
4 the surrounding utilities can be seen on the ALTA survey attached as Schedule C-2 to the  
5 Application.

6 **IV. TARTAN FACTORS**

7 **Q. What standards has the Commission traditionally employed in**  
8 **evaluating CCN applications?**

9 A. It is my understanding the Commission has traditionally analyzed CCN  
10 applications using the Tartan Factors announced in a 1994 decision. *In Re Tartan Energy*,  
11 GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994). The *Tartan* Factors are as follows:

- 12 1. Need for the Project;
- 13 2. Economic Feasibility of the Project;
- 14 3. Ability of the Applicant to Finance the Project;
- 15 4. Qualifications of the Applicant to Construct the Project; and
- 16 5. Whether the Project is in the Public Interest.

17 **Q. Please explain how the Project is economically feasible.**

18 A. As described by my colleague Annemarie Nauert's direct testimony, the  
19 Project is needed to meet customers' thirst for renewable energy options through the  
20 expanded Community Solar Program. It is economically feasible because the Project is  
21 being built to support the voluntary customer program and is funded by the participants of  
22 the Program.

1           **Q.     How did Ameren Missouri determine the number of blocks of power**  
2 **available under the Community Solar Program pilot expansion?**

3           A.     As discussed in the testimony of Annemarie Nauert, customer demand for  
4 the program has continuously grown, and as of October 19, 2020, has a waitlist sufficient  
5 to meet 93% of the Project's planned capacity (~9500 blocks). The proposed 6.1 MW solar  
6 facility was sized based on the following:

- 7           1. Sufficient capacity to meet the immediate demand of customers presently  
8           on the waitlist for the Community Solar Pilot program.
- 9           2. Allows Ameren Missouri to start construction on the Project with at least  
10           90% of the capacity being committed.
- 11          3. Allows the Project to accommodate a small portion of the ongoing customer  
12           demand between now and October 1, 2021 (approximately 1 year) before  
13           the Project goes into operation.

14           The total number of solar blocks was based on the total estimated kilowatt-hour  
15 ("kWh") output of the solar plant over a 25-year life, which also assumes 0.6% annual  
16 panel degradation over the life of the plant. The total 25-year kWh output is divided by the  
17 life of the plant in months (300 months), and then again by 100 (the size of the solar block)  
18 to reach the number of monthly blocks available. The number of solar blocks available is  
19 not adjusted based on the actual annual production of the plant. The number of subscribers  
20 presently on the Program waitlist and a small (less than 7%) forecasted amount of  
21 subscription expected over the next year and prior to the Project becoming operational, was  
22 used to determine the capacity of the solar generating plant and subsequent available blocks  
23 in the Program expansion's Project.



1           **Q.     How does the proposed size and estimated cost of the Project you just**  
2 **described compare to the size and cost estimate included in the original application**  
3 **in the Program expansion docket, File No. ET-2020-0022?**

4           A.     They are slightly larger. The original application for expansion of the  
5 Program in File No. ET-2020-0022 stated:

6                     Although it is not part of this initial filing, Ameren Missouri  
7 will file an application for a Certificate of Convenience and  
8 Necessity [] at a later date for the new solar generation  
9 facility(ies). The Company has not yet identified the  
10 location(s) for the solar facility(ies) and therefore does not  
11 have the details necessary to make a CCN request at this  
12 time, but anticipates the new solar facility(ies) will add up to  
13 7,800 solar blocks (approximately six megawatts) for the  
14 Program expansion, at an estimated cost of up to \$12  
15 million.<sup>1</sup>

16                    However, the Unanimous Stipulation approved by the Commission in File No. ET-  
17 2020-0022 states:

18                     Ameren Missouri will not construct future Program resources  
19 or expansions of existing resources until it has received  
20 customer subscriptions totaling 90% of the planned resource's  
21 capacity (or expansion capacity) and obtained Commission  
22 approval of any required Certificates of Convenience and  
23 Necessity ("CCN"). Ameren Missouri shall include in any  
24 application for a CCN whether there is potential for future  
25 expansion on the proposed site and include in its application a  
26 phasing plan. Ameren Missouri will make reasonable efforts to  
27 size future Program resources to take advantage of economies  
28 of scale.<sup>2</sup>

29                    Therefore, the Unanimous Stipulation approved by the Commission limited actual  
30 construction to 90% of subscriptions and promoted future Program resources taking advantage

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<sup>1</sup> File No. ET-2020-0022, Application for Approval to Expand Community Solar Pilot Program and Associated Tariff, filed November 25, 2019, at para. 12.

<sup>2</sup> File No. ET-2020-0022, Order Approving Stipulation and Agreement, effective June 27, 2020, and attached Unanimous Stipulation and Agreement, at para. 10.

1 of economies of scale. The proposed size of the Project takes advantage of economies of scale  
2 and the cost of the Project was ultimately impacted by its actual size. As mentioned earlier in  
3 this testimony, the Project has been sized at 6.1 MW which is at a level of 93% of the  
4 subscription as of October 19, 2020.

5 **Q. Is there potential for expansion on the proposed site for the Project?**

6 A. Yes, the Project will utilize approximately 55 acres of the 91 acres owned by  
7 Ameren Missouri. The Project is being oriented on the property to allow for the remaining land  
8 to be utilized in the future. However, due to the sizing cap and scope flexibility, expansion or  
9 phasing plans for further development of the site have not been developed.

10 **Q. Does Ameren Missouri have the ability to finance the Project?**

11 A. Yes. The total cost of constructing the Project is estimated to be  
12 approximately **\*\*\_\_\_\_\_\*\***. The cost estimates associated with this Project are  
13 relatively small in scale when compared to some other construction projects that Ameren  
14 Missouri has successfully completed during the past few years, and Ameren Missouri  
15 expects to finance the Project through the use of existing funds and indebtedness while  
16 maintaining strong financial metrics.

17 **Q. Is Ameren Missouri qualified to construct the Project?**

18 A. Yes. Ameren Missouri is an electric utility with a long history of  
19 constructing projects in Missouri. It owns generation of all types, including solar  
20 generation. Ameren Missouri is qualified to construct and operate the Project given the  
21 financial, technical, and management expertise Ameren Missouri has developed over the  
22 course of its long history. As mentioned above, Ameren Missouri issued a request for  
23 proposals and has selected a contractor from those entities that applied. The contractors  
24 solicited also have the experience and knowledge to construct the Project.

1           **Q.     Does the proposed Project promote the public interest?**

2           A.     Yes, the Project will be used to meet the renewable demand of customers as

3 discussed in the direct testimony of Annemarie Nauert.

4   **V.     CONCLUSION**

5           **Q.     Does this conclude your direct testimony?**

6           A.     Yes, it does.

**From:** [Donna Viehmann](#)  
**To:** [Raley, Chad](#)  
**Subject:** [EXTERNAL] montgomery county conditional use  
**Date:** Thursday, March 26, 2020 3:45:57 PM  
**Attachments:** [214066 Ameren.pdf](#)

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**EXTERNAL SENDER STOP.THINK.QUESTION.**

Verify unexpected requests before opening links or attachments.

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Chad-

Thanks for the call this afternoon regarding Ameren's Conditional Use hearing held in 2014. As per our conversation, the hearing still stands as it was. It has been "grandfathered in". I have attached the final paperwork that was sent to the applicant back in 2014. Please note the one condition on the "Resolution of Decision of the Montgomery County Commission Application for Conditional Use" – 1. Design of facility drainage and run-off stay at same amount or less to adjoining property owners. Please let me know if you need anything else.

Donna Viehmann  
Planning and Zoning Administrator  
EOC Administrative Assistant  
911 Mapping and Addressing Coordinator  
310 Salisbury St., Ste D  
Montgomery City, Mo 63361  
573-564-2142

# P&Z

## Montgomery County Planning and Zoning

310 Salisbury St., Ste. D  
Montgomery City, Mo 63361  
573-564-2142  
[planningzoning@mcmo.us](mailto:planningzoning@mcmo.us)

December 18, 2014

Ameren Missouri  
%Scott E. Huber  
P.O. Box 66149  
1901 Chouteau Ave  
St. Louis Mo 63166

Re: Conditional Use Hearing

Dear Mr. Huber:

Union Electric Company d/b/a Ameren Missouri, to construct a solar farm (ground mounted photovoltaic electric generating facility) at 651 Booneslick Rd., New Florence, Missouri has been approved. Congratulations and good luck on your new venture!

Enclosed you will find the "Decision of the Montgomery County Planning & Zoning Commission", "Resolution of Decision of the Montgomery County Commissioners" and a copy of the public hearing minutes. These copies are for your records. The County Commission approved the application with **one** condition and/or restriction. Also enclosed please find a receipt for postage and publication costs.

If you have any questions regarding Planning & Zoning in Montgomery County, please do not hesitate to call the office. It was a pleasure working with you!

Sincerely,



Donna Viehmann  
Zoning Administrator

cc: file  
Scott Wibbenmeyer, via e-mail

enclosures

**DECISION OF THE**  
**MONTGOMERY COUNTY PLANNING & ZONING COMMISSION**  
**APPLICATION FOR CONDITIONAL USE**

**APPLICATION DATE:** 11-13-14

**P&Z PERMIT #** 214066

**APPLICANT NAME:** Scott Wibbenmeyer, with Union Electric Company d/b/a Ameren Missouri

**OWNER OF SUBJECT PROPERTY:** owned by Robert P. Upchurch and Sallaine S. Upchurch, trustees, or their successors in trust, under the Upchurch Living Trust, dated December 2, 1996

**ADDRESS OF SUBJECT PROPERTY:** 651 Booneslick Rd., New Florence, Missouri

**ZONING DISTRICT:** Agriculture

**LAND/BUILDING USE:** to construct a solar farm (ground mounted photovoltaic electric generating facility),

**PUBLIC HEARING DATE:** December 16,2014

**WHEREAS**, the Planning & Zoning Commission does find and determine that the subject property, owned by Robert P. Upchurch and Sallaine S. Upchurch, trustees, or their successors in trust, under the Upchurch Living Trust, dated December 2, 1996, located at 651 Booneslick Rd., New Florence, Missouri is located in the unincorporated portion of Montgomery County in Zoning District Classification Agriculture and is hereby subject to the rules and regulations of the Montgomery County Zoning Order, and

**WHEREAS**, the Applicant, Scott Wibbenmeyer, with Union Electric Company d/b/a Ameren Missouri, has applied for a Conditional Use Permit for the purpose and intent to construct a solar farm (ground mounted photovoltaic electric generating facility), and has presented evidence before the Planning & Zoning Commission at a Public Hearing on this matter,

**NOW, THEREFORE, BE IT RESOLVED**, that the Planning & Zoning Commission does hereby make the following recommendation of action to the Montgomery County Commission:

Approve the Application pursuant to the information provided on the Application with no further Conditions or Restrictions.

Approve the Application subject to the following Conditions or Restrictions and/or after the following Conditions or Restrictions or Required Actions have been proven to have been accomplished:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Deny the Application - Based upon the following Findings of Law:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATE OF ADOPTION OF THIS RESOLUTION : 12-16-14

NAME OF PLANNING & ZONING COMMISSIONER PRESIDING AT PUBLIC HEARING AND ACCEPTING THIS RESOLUTION:

ROBERT COMBS  
PRINTED NAME

Robert Combs  
SIGNATURE

DATE RESOLUTION PRESENTED TO MONTGOMERY COUNTY COMMISSION 12-18-14

Minutes of Public Hearing  
Scott Wibbenmeyer, with Union Electric Company d/b/a Ameren Missouri, to construct a  
solar farm (ground mounted photovoltaic electric generating facility)  
Meeting Date: 12-16-14

Meeting was called to order at 7:00 p.m., by Chair, Bob Combs.

Members present: Bob Combs, Pat Merz, Russell Devlin, Ray Heldt, Roy Cope and Mark Bruckerhoff.

Members NOT present: Jeff Moore.

Chair, Bob Combs, read #1-8 from the Public Hearing Format Form.

Donna Viehmann, Zoning Administrator, presented Exhibits A-O.

Chair, Bob Combs, ask Scott E. Huber, Corporate Counsel of Union Electric Company d/b/a Ameren Missouri, to present their plans to the board.

Mr. Huber addressed the board members introduced Michael Harding and Scott Wibbenmeyer.

Chair, Bob Combs, continued to read from the Public Hearing Format #9 and ask for public comment.

Mr. Hilbert Steiner, a 1000' landowner expressed his concerns of water run-off with the project.

Mr. Wibbenmeyer addressed these concerns and asked for Mr. Steiner's information, and indicated Ameren is willing to work with the neighbors on the issue. Mr. Wibbenmeyer also stated a water run-off study will be conducted, the plans are for Ameren to have the same run-off or less after the grading and instillation is finished.

James Meiners, a 1000' landowner also expressed his concerns of the water run-off with the project.

Chair, Bob Combs, then read from the Public Hearing Format #10 ending public comment and opening discussion by the P&Z Board Members.

After discussion by the P&Z Board, Ray Heldt moved to accept the application as presented. Pat Merz seconded motion. A roll call vote was cast. Bob Combs -yes, Ray Heldt- yes, Roy Cope- yes, Pat Merz- yes, Russell Devlin-yes, Jeff Moore- absent and Mark Bruckerhoff-absent. Motion passed 6-0.

Mark Bruckerhoff moved to close the Public Hearing. Roy Cope seconded motion. A voice vote was cast. Motion passed. Hearing closed at 7:40 p.m.



# MONTGOMERY COUNTY COMMISSION

Rich Daniels  
1<sup>st</sup> District Commissioner

Ryan D. Poston  
Presiding Commissioner

John W. Noltensmeyer  
2<sup>nd</sup> District Commissioner

## RESOLUTION OF DECISION OF THE MONTGOMERY COUNTY COMMISSION APPLICATION FOR CONDITIONAL USE

WHEREAS, in regards to PLANNING & ZONING PERMIT #214066, and

WHEREAS, the Montgomery County Commission has reviewed the Application for Conditional Use and the evidence presented at the Public Hearing to construct a solar farm (ground mounted photovoltaic electric generating facility) at 651 Booneslick Rd., New Florence, Missouri owned by Robert P. Upchurch and Sallaine S. Upchurch, trustees, or their successors in trust, under the Upchurch Living Trust, dated December 2, 1996, and

WHEREAS, the Montgomery County Commission has reviewed the attached RESOLUTION OF DECISION of the Montgomery County Planning & Zoning Commission regarding this matter,

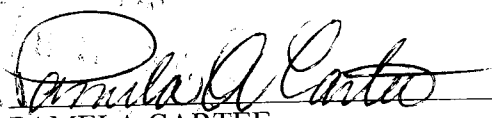
NOW, THEREFORE, BE IT RESOLVED, that the Montgomery County Commission does hereby make the following DETERMINATION:

- \_\_\_\_\_ Approve the Application, with no further Conditions or Restrictions
- \_\_\_\_\_ Approve the Application subject to the specified Conditions or Restrictions which the Planning and Zoning Commission recommended:
- X \_\_\_\_\_ Approve the Application subject to specific Conditions or Restrictions listed below: *as attached*
- \_\_\_\_\_ Deny the Application

Signed this 18<sup>th</sup> day of December 2014.

  
\_\_\_\_\_  
RYAN D. POSTON, PRESIDING COMMISSIONER

Attest:

  
\_\_\_\_\_  
PAMELA CARTEE  
COUNTY CLERK

211 East Third Street,  
Montgomery City, MO 63361  
Office 573-564-3357 Fax 573-564-8091

Scott Wibbenmeyer. With Union Electric Company d/b/a Ameren Missouri, to construct a  
Solar farm (ground mounted photovoltaic electric generating facility)

#214066 restrictions and conditions:

1. Design of facility drainage and run-off stay at same amount or less to adjoining property owners.

**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	)	File No. EA-2020-0371
Necessity.	)	

**AFFIDAVIT OF SCOTT J. WIBBENMEYER**

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

Scott J. Wibbenmeyer, being first duly sworn on her oath, states:

1.       My name is Scott J. Wibbenmeyer. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a Ameren Missouri as Director, Renewable and Technology Business Development.
  
2.       Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Union Electric Company d/b/a Ameren Missouri consisting of 9 pages, of which have been prepared in written form for filing in the above-referenced docket.
  
3.       Further, under the penalty of perjury I hereby swear and affirm that the information contained in the attached testimony to the questions therein propounded is true and correct.

  
 \_\_\_\_\_  
 Scott J. Wibbenmeyer

Sworn to on this 28<sup>th</sup> day of October, 2020.