

Exhibit No.:
Issues: *Costs Associated with Labadie
Energy Center Expansion*
Witness: *John P. Cassidy*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Supplemental Testimony*
Case No.: *EA-2012-0281*
Date Testimony Prepared: *February 19, 2014*

MISSOURI PUBLIC SERVICE COMMISSION
REGULATORY REVIEW DIVISION
UTILITY SERVICES

SUPPLEMENTAL TESTIMONY
OF
JOHN P. CASSIDY

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

CASE NO. EA-2012-0281

Jefferson City, Missouri
February 19, 2014

1 **SUPPLEMENTAL 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 as a Utility Regulatory Auditor V.

12 Q. Are you the same John P. Cassidy who previously filed rebuttal and
13 cross-surrebuttal testimony in this case?

14 A. Yes.

15 Q. Have you reviewed Union Electric Company, d/b/a Ameren Missouri's
16 ("Ameren Missouri" or "Company") supplemental testimony that was filed on January 24,
17 2014, in support of its application for permission, approval, and a certificate of public
18 convenience and necessity ("CCN") to expand the boundaries of its Labadie Energy Center so
19 that it can construct and operate a utility waste landfill ("UWL") and conduct other plant
20 related operations at the site?

21 A. Yes, I have, in conjunction with other members of the Staff.

22 Q. What is the purpose of your supplemental testimony?

23 A. I address cost-related aspects of the design and installation of additional
24 groundwater monitoring wells that are now part of the proposed UWL. Staff witness

1 Daniel I. Beck addresses all engineering and operational related aspects of the UWL and
2 the CCN application.

3 Q. Have you conducted any further investigation into the costs associated with
4 this project due to Ameren Missouri's submittal of a revised Construction Permit Application
5 ("CPA") to the Missouri Department of Natural Resources on December 11, 2013?

6 A. Yes. Staff met with the Company on January 3, 2014 to discuss the revised
7 CPA as well as the costs associated with the seven additional groundwater monitoring wells
8 that were recommended by Andrews Engineering, Franklin County's Independent Registered
9 Professional Engineer. During this meeting the Company indicated that the design and
10 installation of these seven additional wells would result in approximately \$150,000 of
11 additional capital costs associated with the completion of the first phase of the UWL project.
12 This capital cost estimate is also discussed in Ameren Missouri witness Craig J. Giesmann's
13 supplemental testimony on page 4, lines 12 through 16.

14 Q. Do these additional costs change your opinion of the project as stated in your
15 rebuttal testimony?

16 A. No. These costs are incidental in nature and do not change the results of the
17 Reitz & Jens Consulting Engineers study previously discussed in my rebuttal testimony. The
18 UWL continues to be economically feasible and does not impact Ameren Missouri's
19 financial ability to construct, operate and maintain the proposed UWL. In addition the Staff
20 will have the opportunity to review all of the costs associated with the UWL project in a
21 future rate proceeding.

22 Q. Does this conclude your supplemental testimony in this proceeding?

23 A. Yes, it does.

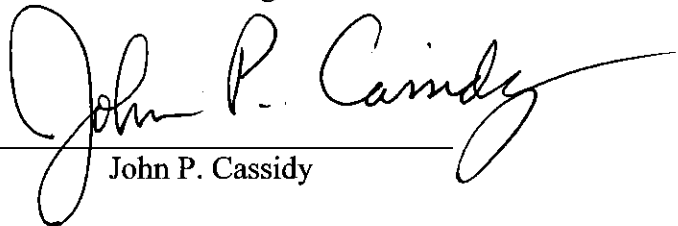
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

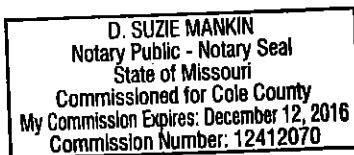
STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

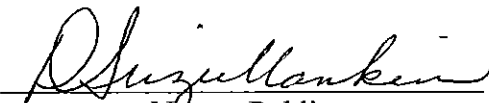
John P. Cassidy, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Supplemental Testimony in question and answer form, consisting of 2 pages to be presented in the above case; that the answers in the foregoing Supplemental Testimony were given by him; that 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 19th day of February, 2014.





Notary Public