Exhibit No.:

Issue(s): Policy

Witness: Natelle Dietrich
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony

Case No.: EA-2019-0371

Date Testimony Prepared: December 12, 2019

MISSOURI PUBLIC SERVICE COMMISSION INDUSTRY ANALYSIS DIVISION

REBUTTAL TESTIMONY

OF

NATELLE DIETRICH

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. EA-2019-0371

Jefferson City, Missouri December 2019

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REBUTTAL TESTIMONY 1 2 OF 3 NATELLE DIETRICH 4 UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI 5 CASE NO. EA-2019-0371 6 **EXECUTIVE SUMMARY** 7 8 Q. What is the purpose of your Rebuttal Testimony? 9 The purpose of my Rebuttal Testimony is to sponsor Staff's Rebuttal Report Α. 10 filed concurrently with this testimony in response to the Application of Union Electric 11 Company d/b/a Ameren Missouri ("Ameren Missouri") and the Direct Testimonies of 12 Ameren Missouri witnesses Tom Byrne and Kevin Anders filed September 3, 2019 and the 13 Amended Application, Revised Testimony of Kevin Anders and Supplemental Direct 14 Testimony of Rex Jenkins filed on November 25, 2019 ("Amended Application")(collectively, 15 "Application"). 16 Q. Please briefly describe the Application in this case. 17 A. In its Application, Ameren Missouri requested three Certificates of Convenience 18 and Necessity ("CCNs") under subsection 1 of Section 393.170 RSMo. (2018) authorizing it to 19 construct, install, own, operate, maintain, and otherwise control and manage a solar generating 20 asset to be constructed near Green City, Missouri in Sullivan County ("Green City Project"); 21 a solar generating asset to be constructed near Richwoods, Missouri in Washington County 22 ("Richwoods Project"); and, a solar generating asset to be constructed near Utica, Missouri in 23 Livingston County ("Utica Project"). According to the Application, each of the generating 24 assets will be paired with battery storage "to address reliability concerns and an alternative to a

traditional 'wires only' solution." The Application also states, "The battery storage to be paired with the solar generating assets for the Green City Project and Richwoods Project are not 'assets' as defined in 20 CSR 4240-20.045(1)(A), and therefore, Applicant does not seek a CCN for the battery storage components of those respective projects." In its Amended Application, Ameren Missouri explains that since filing its original application in September 2019, it discovered the location of the Utica Project is outside of its certificated service area; thus, Ameren Missouri requests a CCN for the energy storage battery and distribution facilities, "as an 'asset' as defined in 20 CSR 4240-20.045(1)(A), that will be located near Utica Missouri but outside of Ameren Missouri's certificated service area." 1.

Ameren Missouri's Application and Direct Testimony discuss the applicability of Section 393.1665 RSMo. (2018) to the proposed projects and comments on the Tartan Factors² (Need for the Project; Economic Feasibility of the Project; Ability of the Applicant to Finance the Project; Qualifications of the Applicant to Construct the Project; Whether the Project is in the Public Interest) traditionally analyzed by Staff and the Commission when reviewing CCN applications. According to Ameren Missouri, Section 393.1665 makes moot the requirement for Ameren Missouri to demonstrate a need or the economic feasibility for the projects in the instant Application.

STAFF RECOMMENDATION

- Q. Please summarize Staff's analysis and recommendation(s).
- A. Ameren Missouri proposed the Solar + Storage projects as options to solve reliability issues on three sub-transmission circuits. As explained in Staff's Rebuttal Report,

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¹ Id at page 2-3

² In Re Tartan Energy, GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994).

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Staff reviewed Ameren Missouri reliability metrics as reported consistent with 20 CSR 4240-23. In its Rebuttal Report, Staff identifies concerns with how Ameren Missouri is prioritizing distribution system projects. Further, Staff expresses concern that the need for the instant projects were not identified in the integrated resource planning process. Staff also reviewed the Tartan Criteria consistent with its review of other CCN applications. Staff notes that based on its analysis, the Solar + Storage projects meet the following Tartan Criteria: Economic Feasibility, generally; Ability of the Applicant to Finance the Project; and, Qualifications of the Applicant to Construct the Project. Based on its review, Staff further states that when reviewing "economic feasibility" in conjunction with "need", there is not a need for the Projects which justifies the cost; thus, bringing into question whether the Projects are in the public interest. However, recognizing the importance of gaining insight into Solar + Storage solutions, Staff would be supportive of the Richwoods Project moving forward as a pilot project. As Staff explains, the Richwoods Project impacts more customers, more customers are considered to be served by critical infrastructure, and there is load growth projected in the future when compared to the other projects. Staff recommends certain conditions should the Commission approve any CCN as part of this case.

- Q. Does this conclude your testimony?
- 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 Permission and Approval and a Certificate of Convenience and Necessity Authorizing It to Construct Solar Generation Facility(ies)) d))
Concration Facility (103)	/

AFFIDAVIT OF NATELLE DIETRICH

State of Missouri)) ss County of Cole)

COMES NOW Natelle Dietrich, and on her oath declares that she is of sound mind and lawful age, that she contributed to the attached *Rebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Natelle Dietrich

<u>JURAT</u>

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 12th day of December, 2019.

NOTARY PUBLIC

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missourl
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377