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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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EXECUTIVE SUMMARY1

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

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

18 **STAFF RECOMMENDATION**

19 Q. Please summarize Staff’s analysis and recommendation(s).

20 A. Ameren Missouri proposed the Solar + Storage projects as options to solve
21 reliability issues on three sub-transmission circuits. As explained in Staff’s Rebuttal Report,

¹ Id at page 2-3.

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

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

17 Q. Does this conclude your testimony?

18 A. Yes it does.

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))

