

Issue(s): CCN for Brickyard Hills
Wind Project – Opposition
Witness: Melissa Meek
Type of Exhibit: Direct Testimony
Sponsoring Party: DeKalb County, Missouri
File No.: EA-2019-0021
Date Testimony Prepared: December 20, 2018

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2019-0021

**DIRECT TESTIMONY
OF
MELISSA MEEK, COUNTY CLERK
DEKALB COUNTY, MISSOURI
ON BEHALF OF
DEKALB COUNTY, MISSOURI
INTERVENOR IN CASE**

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**DIRECT TESTIMONY
OF
MELISSA MEEK, COUNTY CLERK
DEKALB COUNTY, MISSOURI
FILE NO. EA-2019-0021**

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Melissa Meek and my business address is County Courthouse,
Maysville, Missouri.

Q. What is your position with DeKalb County, Missouri.

A. I am the elected county clerk for DeKalb County, Missouri.

**Q. Please describe your duties and responsibilities as the elected county clerk
for DeKalb County, Missouri.**

A. As the county clerk for the county, I am the primary elected official whose duties
include serving as the custodian of records for the DeKalb County Commission, assisting with
the confirmation and distribution of tax bills for the taxes assessed for real and personal property
located within the political boundaries of DeKalb County, Missouri, and for notifying the state
authorities of the allocation of taxes and levies of the governmental entities in the county.

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

A. The purpose of my testimony is to oppose Ameren's application for a certificate
of Convenience and Necessity (CCN) for a wind generation project that is located in DeKalb
County, Missouri, and in support of preserving the taxes assessed and collected from the
company who currently owns the wind tower project that is the subject of this proceeding. I am

1 also opposing the merger of the non-Public Service Commission regulated wind project owner
2 with Ameren which is a regulated entity under the jurisdiction of the Public Service
3 Commission.

4 II. COUNTY COMMISSION'S ACTIONS

5 After review of the County Commission's records, I testify that the DeKalb County
6 Commission has not granted any tax relief or any tax reductions as of the date of this testimony
7 to any entity engaged in the development of wind energy in behalf of Ameren or any
8 organization associated with Ameren in any way.

9 After review of the County Commission's records, I testify that the DeKalb County
10 Commission has not granted Ameren any assent under Sec. 229.100 RSMo to cross county roads
11 for any purpose related to the development and operation of wind towers.

12 After review of the County Commission's records, I testify that the DeKalb County
13 Commission has not granted any permission to assign any interest in any economic development
14 agreement with any wind power development entity to Ameren.

15 After review of the County Commission's records, I testify that the DeKalb County
16 Commission has not granted Ameren any permission of any type to construct, operate, or
17 otherwise engage in the development of wind power energy or related projects in DeKalb
18 County.

19 After review of the County Commission's records, I testify that the DeKalb County
20 Commission has not entered into any economic development agreement that involves Ameren.

21 From my years of experience in county government in DeKalb County, I testify that if
22 the Public Service Commission allows Ameren to prevail in its application, the taxing districts in
23 DeKalb County will lose all of the local tax revenues that support all of the governmental
24 services provided in the county, including road and bridge construction and maintenance,

1 educational programs of the school districts, the providing of emergency services such as those
2 provided by ambulance and fire districts, and health care services to citizens of DeKalb County.

3 If Ameren prevails in its application there will be no appreciable local taxes collected and
4 used in DeKalb County, and the taxes applicable to Ameren assessed through the State Tax
5 Commission will be distributed throughout all of the other counties in Missouri.

6 **III. SUMMARY AND CONCLUSIONS**

7 From the information that I have from the information provided to this Commission by
8 Ameren and the data that I have as the DeKalb County Clerk, the only advantage of the approval
9 of the application is to reduce Ameren's tax rate. The great disadvantage of the approval of the
10 application is to deprive the citizens and taxing entities of DeKalb County of the tax revenues
11 that will be paid by the developer of the wind power project as an unregulated entity that will be
12 avoided if Ameren's application is granted and the wind power project is transferred to Ameren
13 as an entity under the jurisdiction of the Public Service Commission.

14 There will be no more electric power generated if the application is granted than if it is
15 denied. There will be no more wind towers built. From this testimony and the record provided
16 by Ameren, it can be concluded that great harm will be inflicted on the citizens of DeKalb
17 County if the application is granted. No harm will be placed on Ameren and certainly there is
18 no necessity to gain the desired electric power of Ameren because Ameren can just as easily
19 purchase the power generated by the wind towers owned by the non-regulated owner as it can
20 generate the power as if it owned the towers. The difference is in taxation, not availability of
21 power to help Ameren meet its energy needs in compliance with the law and to meet its
22 customers' energy needs.

IV. RELIEF REQUESTED

The Public Service Commission should deny Ameren's application for Certificate of Necessity and Need because the Ameren has not proven that there is a need for Ameren to own the wind power project in order to obtain the electric power that it asserts it needs to serve its customers. When balancing the public good produced by local taxation by local taxing districts against the lack of benefit to the public by Ameren's application and the losses to the citizens of DeKalb County, it is clear that the application must be denied.

**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 Necessity Authorizing)
It to Construct a Wind Generation Facility.)

File No. EA-2019-0021

AFFIDAVIT OF MELISSA MEEK

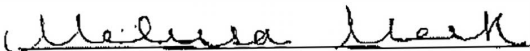
STATE OF MISSOURI)
) ss
COUNTY OF DEKALB)

Melissa Meek, being first duly sworn on his oath, states:

1. My name is Melissa Meek. I work in the County of DeKalb, Missouri and I am employed by DeKalb County as the duly elected County Clerk.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of DeKalb County, Missouri consisting of six (6) pages, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.


Melissa Meek

Subscribed and sworn to before me this 20th day of December, 2018.


Notary Public

My commission expires: November 15, 2020



JESSICA LEE
My Commission Expires
November 15, 2020
DeKalb County
Commission #18770701