Exhibit No.: Issue(s): Witness: Sponsoring Party: Type of Exhibit:

Case No.: Date Testimony Prepared:

South St. Louis Renewable Energy Center in-service criteria Claire M. Eubanks, PE MoPSC Staff True-Up Direct Testimony ER-2021-0240 November 5, 2021

MISSOURI PUBLIC SERVICE COMMISSION INDUSTRY ANALYSIS DIVISION ENGINEERING ANALYSIS DEPARTMENT

TRUE-UP DIRECT TESTIMONY

OF

CLAIRE M. EUBANKS, PE

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

CASE NO. ER-2021-0240

Jefferson City, Missouri November 2021

** <u>Denotes Confidential Information</u> **

| 1 | | TRUE-UP DIRECT TESTIMONY | | |
|--------|---|---|--|--|
| 2 | | OF | | |
| 3 | | CLAIRE M. EUBANKS, PE | | |
| 4 5 | | UNION ELECTRIC COMPANY, d/b/a Ameren Missouri | | |
| 6 | CASE NO. ER-2021-0240 | | | |
| 7 | Q. | Please state your name and business address. | | |
| 8 | А. | Claire M. Eubanks and my business address is Missouri Public Service | | |
| 9 | Commission, P.O. Box 360, Jefferson City, Missouri, 65102. | | | |
| 10 | Q. | By whom are you employed and in what capacity? | | |
| 11 | А. | I am employed by the Missouri Public Service Commission ("Commission") as | | |
| 12 | the Manager of the Engineering Analysis Department, Industry Analysis Division. | | | |
| 13 | Q. | Are you the same Claire Eubanks who contributed to Staff's Direct Cost of | | |
| 14 | Service Report and wrote rebuttal testimony in this case? | | | |
| 15 | А. | Yes. | | |
| 16 | Q. | What is the purpose of your True-up Direct Testimony? | | |
| 17 | А. | In Staff's Direct Cost of Service report, I recommended Ameren Missouri | | |
| 18 | demonstrate that the South St. Louis Renewable Energy Center meet the solar in-service | | | |
| 19 | criteria contained in Schedule CME-d1 (attached to Staff's Direct Cost of Service Report) | | | |
| 20 | by the true-up cutoff date, September 30, 2021, to include the solar facility in rate base. | | | |
| 21 | Ameren Missouri provided a response to Staff data request 432.1 on July 16, 2021, and | | | |
| 22 | supplemented the response on August 12, 2021, with the information necessary for Staff to | | | |
| 23 | review the in-service criteria for this facility. | | | |
| 24 | Q. | Please describe the South St. Louis Renewable Energy Center. | | |

True-Up Direct Testimony of Claire M. Eubanks, PE

| 1 | А. | The South St. Louis Renewable Energy Center is a 192 kW-AC solar facility |
|--|----------------------|---|
| 2 | and part of A | meren Missouri's Neighborhood Solar program. The South St. Louis Renewable |
| 3 | Energy Cente | er consists of solar panels mounted on canopy structures and inverters. |
| 4 | Q. | What are the recommended in-service criteria? |
| 5 | А. | The recommended criteria are: |
| 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | 0 | All major construction work is complete. All preoperational tests have been successfully completed. The facility meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list. Upon observation of the facility for 72 consecutive hours the facility will have demonstrated that when sunlight was shining on it during that period it produced power in a standard operating mode. Facility shall meet at least 95% of the guaranteed capacity (in MW AC) based on the Capacity Test.¹ The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions. Sufficient transmission/distribution interconnection facilities shall exist for the total plant design net electrical capacity at the time the facility is declared fully operational and used for service. Sufficient transmission/distribution facilities shall exist for the total plant design net electrical capacity into the utility service territory at the time the facility is declared fully operational and used for service. Have all the above listed in-service criteria been met? |
| 23 24 | Q. A. | Yes. |
| 25 | Q. | What is your recommendation regarding whether South St. Louis Renewable or is in service or not? |
| 26 | 0. | |
| 27 28 | A. Center fully c | I recommend the Commission find the South St. Louis Renewable Energy operational and used for service as of July 21, 2021. |
| | 1 ** | ** |

True-Up Direct Testimony of Claire M. Eubanks, PE

Q. What information did you review? 1 I reviewed the following studies and reports: 2 A. 3 Completed System Start-up Test Procedures • Pre-substantial Completion Report 4 • Substantial Completion Certificate 5 • Generation Interconnection Study Report 6 • 7 Please describe how these reports demonstrate the solar facility is fully Q. 8 operational and used for service. 9 A. ** 10 11 12 13 14 15 16 17 18 ** Does this conclude your true-up direct testimony? 19 Q. 20 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

Case No. ER-2021-0240

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

| STATE OF MISSOURI |) | |
|-------------------|---|-----|
| |) | ss. |
| COUNTY OF COLE |) | |

COMES NOW CLAIRE M. EUBANKS, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Direct Testimony of Claire M. Eubanks, PE;* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Claire M Ebanks, PE

JURAT

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 4μ day of November, 2021.

Dianna' L- Vauget

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