

**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<sup>1</sup> for Certificates of )  
Convenience and Necessity for Solar Facilities )

**File No. EA-2023-0286**

**DEPOSITION NOTICE**

**TO:** Union Electric Company, d/b/a  
Ameren Missouri  
Jim Lowery, Attorney  
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All parties of record per EFIS

**PLEASE TAKE NOTICE** that on January 29, 2024, beginning at 9:00 a.m. (unless another date and time are agreed to by Staff) and commencing from day to day thereafter until completed, the Staff of the Missouri Public Service Commission will depose Ameren Missouri pursuant to Missouri Supreme Court Rule 57.03 (b) (4). The deposition will continue until 3 p.m. on each day until completed and will resume at 8:30 a.m. on each day following January 29. The deposition(s) will occur in Room 810, Governor’s Office Building, 200 Madison Street, Jefferson City, Missouri. Please take notice that this deposition or depositions will be taken both for discovery purposes and to preserve the testimony for presentation as evidence in an evidentiary hearing in this cause.

Pursuant to Rule 57.03 (b) (4) Ameren Missouri shall designate and produce for deposition one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf concerning the following matters:

1. Identification of each and all of the “needs” Ameren Missouri contends each project meets, including but not limited to (a) anticipated deficits in accredited production capacity with identification of the years, seasons, and hours in which such deficit is anticipated; (b) anticipated deficits in renewable energy

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<sup>1</sup> Hereinafter, “Ameren Missouri.”

- certificates for purposes of the Missouri Renewable Energy Standard; (c) economic value as an energy price hedge; (d) or any other need the Company considered.
2. The Company's reasons for contending that the specific projects selected are reasonable choices and the best choices to fit the needs identified. The witness produced should be able to explain Ameren Missouri's analysis to determine that each of the four requested solar projects is a reasonable means of addressing each need. The witness should be able to identify and explain any alternatives explored. The witness should be able to describe any modeled impact which the Company considered, including any modeled alternatives considered, such as alternative generation options, PPAs, and demand response.
  3. The Company should produce a witness who can address whether the Company asserts that these projects are needed to reduce the hours in which Ameren Missouri is a net purchaser of energy through the MISO integrated energy market; and who can testify as to any modeling done to determine whether and to what extent the addition of the projects will increase or decrease Ameren Missouri's net purchases both in terms of MWh and dollars.
  4. The Company should produce a witness who can address whether the Company asserts that these projects are needed to reduce the hours in which Ameren Missouri is a net purchaser of energy through the MISO integrated energy market. The Company should produce a witness to the Company's view of the impact of these projects on the hours in which Ameren Missouri is

a net purchaser of energy through the MISO integrated energy market; and a witness to testify as to what, if any, consideration the Company gave to required production runs, with and without the resource, with variation in LMP and other dispatch parameters, in order to determine whether adding a resource actually increases the production of the Ameren Missouri generating fleet in a given interval, and whether the introduction of the solar project improves or weakens the net revenue produced by total Ameren Missouri generation.

5. If Ameren Missouri asserts that each project is an improvement justifying its costs to ratepayers, the Company should produce a witness who can testify as to the anticipated cost and benefit (monetized and/or operationally) for each project in each year; and whether/how/and results of any revenue requirement modeling performed with any of the following attributes: (a) modeled updated inputs;
- (b) modeled accounting for expected production differences among projects (P50-P95); (c) modeled accounting for PISA treatment and rate recovery;
- (d) modeled accounting for RESRAM treatment (e) modeled reasonable rate case timing scenarios/permutations that do not reflect annual rate cases unless annual rate cases are anticipated; (f) modeled tax benefit treatment in some manner other than a single year offset to expense; (g) modeled treatment of real estate among the facilities, such as assuming appreciation at the rate of inflation and then modeled as sold at the time terminal net salvage is applied;
- (h) modeled accounting for voltage distinctions in the valuation of the LMPs as

energy;

(9) modeled accounting for voltage distinctions in the avoidance of MISO charges based on load-ratio share or other characteristics; (i) modeled estimations of the extent to which capacity value may be monetized, addressing MISO potential revision of ratings for solar, particularly in winter; (j) modeled projections of the market appetite for capacity; (k) modeled estimates of the value of reduction in load LMP; (l) modeled estimates of the lost value of marginal revenues on existing generation due to reduction in adjacent gen node LMPs; (m) modeled effects of REC sales or assumed values, as applicable; and (n) modeled alternative energy pricing scenarios, such as prices resulting from environmental policies other than a carbon tax.

6. Produce a witness who can testify as to what, if any, consideration the Company gave to the filed Loss of Load Expectation Study (LOLE) to these projects, considering the changes in Ameren Missouri's preferred resource plan; the location, size, and quantity of these solar projects as distinct from those considered in the LOLE study; the decision to not model the entirety of the applicable MISO zone; and any discrepancies between the LOLE modeled solar output and the economic modeled solar output.
7. The definition of "economic feasibility" which Ameren Missouri contends each of the four projects described in Ameren Missouri's application meets.
8. Whether Ameren Missouri's definition of "economic feasibility" has gained general acceptance among professional economists in the field of economics.

9. The economic benefits which Ameren Missouri contends that Ameren Missouri rate payers will actually receive from the four projects in consideration of the rates which they will pay for those four projects.

/s/ Paul T. Graham #30416

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**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this January 17, 2024, by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham