

**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 Certificates of)
Convenience and Necessity for Solar Facilities.) **File No. EA-2023-0286**

STAFF’S MOTION TO AMEND REBUTTAL TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves to amend the prefiled rebuttal testimony of Staff witness Cedric Cunigan, stating further:

1. On October 11, 2013, Staff filed the rebuttal testimony of Witness Cedric Cunigan, P.E, in this case.

2. Based on discussions between Ameren Missouri (the “company”) and Staff of the company’s testimony, Staff has become aware of a misunderstanding of material provided in its analysis of the Company’s records. This misunderstanding resulted in Staff conclusions which Staff is now retracting. Accordingly, Staff is amending Mr. Cunigan’s rebuttal and removing lines 5-14 of page 10 of Mr. Cunigan’s rebuttal testimony.

3. A “red-lined” copy of page 10 of the testimony is attached for the Commission’s convenience as Attachment A. If permitted, however, the Staff proposes to substitute a “clean” copy of the duly amended testimony in EFIS.

4. Ameren Missouri consents to this request.

5. No party will be prejudiced by this amendment.

WHEREFORE, Staff requests the relief described in the premises.

Respectfully Submitted,

/s/ Paul T. Graham #30416

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this January 18, 2024, by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham

1 A. Ameren Missouri issued four RFPs, two for wind projects in 2020 and 2022, and
2 two for solar projects in 2020 and 2022. The projects were evaluated by Ameren Missouri and
3 1898 & Co.¹⁵ The scorecards were attached to the response to Staff Data Request No. 0003.

4 Q. Does Staff have any concerns with the evaluation process?

5 ~~A. Yes. **** One of Ameren’s ranking criteria was capital cost. The capital cost is**~~
6 ~~ranked for each project in the RFP and then scored either 1, 3, or 5 based on its rank against~~
7 ~~other projects. A higher criteria score is given to higher cost projects. This weighting benefits~~
8 ~~Ameren shareholders by choosing projects that would result in higher rate base. While this is~~
9 ~~only one criterion in the ranking, it accounts for 2% of the overall score in the 2020 RFP and~~
10 ~~3% for Build Transfer Agreements (“BTAs”) in the 2022 RFP and 7.5% for Development~~
11 ~~Transfer Agreements (“DTAs”) in the 2022 RFP. **** The percentage isn’t the problem. The**~~
12 ~~fact that higher capital cost projects are rated higher than lower cost projects is. All else held~~
13 ~~equal, ranking a higher cost project higher would be the opposite of a prudent decision criteria.~~

14 ~~Q. Were there other concerns with project selection outside of the RFP evaluations?~~

15 A. Yes. Ameren Missouri’s RFPs were only for wind and solar resources. Staff
16 witness Brad J. Fortson discusses Staff’s concern that the alternative resource plans (“ARP”) in
17 Ameren’s IRP are similar and do not provide a good comparison of generation portfolios or
18 justify a specific project.¹⁶ Additionally, Staff witness Shawn E. Lange, PE discusses the lack
19 of purchased power agreements (“PPAs”) being considered to meet Ameren Missouri’s needs.¹⁷

¹⁵ 1898 & Co. is a consulting company that is a part of Burns & McDonnell.

¹⁶ See Rebuttal Testimony of Staff witness Brad J. Fortson.

¹⁷ See Rebuttal Testimony of Staff witness Shawn E. Lange, PE.

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) Case No. EA-2023-0286
Permission and Approval and Certificates of)
Public Convenience and Necessity Authorizing)
it to Construct Renewable Generation Facilities)

AFFIDAVIT OF CEDRIC E. CUNIGAN, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CEDRIC E. CUNIGAN, PE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Amended Rebuttal Testimony of Cedric E. Cunigan, PE*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

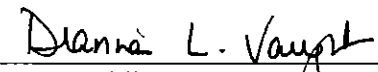


CEDRIC E. CUNIGAN, PE

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 18th day of January 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377



Notary Public