

Exhibit No. 217

Commission Staff -- Exhibit 217
J Luebbert
Rebuttal Testimony
File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:
Issue(s): In Service
Witness: J Luebbert
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2021-0240
Date Testimony Prepared: October 15, 2021

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

J LUEBBERT

**UNION ELECTRIC COMPANY
d/b/a Ameren Missouri**

CASE NO. ER-2021-0240

*Jefferson City, Missouri
October 2021*

**** Denotes Confidential Information ****

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REBUTTAL TESTIMONY

OF

J LUEBBERT

**UNION ELECTRIC COMPANY
d/b/a Ameren Missouri**

CASE NO. ER-2021-0240

Q. Please state your name and business address.

A. My name is J Luebbert and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, MO 65102.

Q. Are you the same J Luebbert that provided sections in Staff's Direct report in this proceeding?

A. Yes, I am.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to provide the Commission an update to Staff's in-service analysis for the High Prairie Wind Farm.

Q. What was Staff's position at direct?

A. ** [REDACTED]

Rebuttal Testimony of
J Luebbert

1 Q. Why is Staff updating the in-service analysis?

2 A. Staff requested through follow up data requests, and Ameren Missouri provided,
3 additional information and verification from Ameren Missouri regarding the satisfaction of
4 term 2.c. of the jointly submitted in-service criteria.

5 Q. What does term 2.c. of the in-service criteria require?

6 A. Term 2.c. requires each item on the MCC to have been satisfied and proof that
7 the turbine is ready to commence commissioning.¹

8 Q. What additional information did Ameren Missouri provide?

9 A. Ameren Missouri's response to Staff Data Request No. 0767 included a
10 list of MCC items that either remained open or had been completed and were considered closed.
11 Ameren Missouri's initial response to Staff's follow up Data Request No. 0767.1 indicated that
12 all but one of the MCC items were resolved as of August 30, 2021. The MCC item that
13 remained open as of September 1, 2021 was a damaged switch with an expected resolution date
14 of September 17, 2021. Ameren Missouri provided a supplemental response to Staff Data
15 Request No. 0767.1 on September 20, 2021, which indicated that the final open MCC item was
16 resolved on September 16, 2021.

17 Q. What is Staff's updated position regarding Ameren Missouri's fulfillment of the
18 jointly submitted in-service criteria?

19 A. Based on Staff's analysis, High Prairie has met the in-service criteria as of
20 September 16, 2021. Since Staff initially developed its revenue requirement as though the High

¹ Commissioning is the process by which a developer tests the operability and condition of mechanical, electrical, and safety components for each wind turbine prior to placing the turbine into operation to produce power. The jointly filed in-service criteria requires the completion of a Commissioning Completion Certificate for each turbine.

Rebuttal Testimony of
J Luebbert

1 Prairie project was in-service, an adjustment based upon failure to meet the in-service
2 requirements is unnecessary at this time.

3 Q. Do any other Staff members intend to file testimony related to the High Prairie
4 Wind Farm?

5 A. Yes, Staff witnesses Claire Eubanks and Lisa Ferguson will provide testimony
6 regarding the curtailment of the wind turbines.

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI


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 J LUEBBERT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of J Luebbert*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

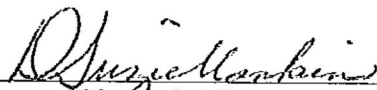


J LUEBBERT

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 13th day of October 2021.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public