

Exhibit No.:  
Issues: In-Service Criteria  
Witness: Claire M. Eubanks  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: ER-2014-0258  
Date Testimony Prepared: February 6, 2015

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**CLAIRE M. EUBANKS**

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

**CASE NO. ER-2014-0258**

*Jefferson City, Missouri*  
*February 2015*

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

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

Case No. ER-2014-0258

**AFFIDAVIT OF CLAIRE M. EUBANKS**

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE     )

Claire M. Eubanks, of lawful age, on her oath states: that she has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 2 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.

  
\_\_\_\_\_  
Claire M. Eubanks

Subscribed and sworn to before me this 4<sup>th</sup> day of February, 2015.

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| SUSAN L. SUNDERMEYER<br>Notary Public - Notary Seal<br>State of Missouri<br>Commissioned for Callaway County<br>My Commission Expires: October 28, 2018<br>Commission Number: 14942086 |
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Notary Public

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**SURREBUTTAL TESTIMONY**

**OF**

**CLAIRE M. EUBANKS**

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

**CASE NO. ER-2014-0258**

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Q. What are your name and business address?

A. Claire M. Eubanks, P.O. Box 360, Jefferson City, Missouri, 65102.

Q. Are you the same Claire M. Eubanks who contributed to Staff's Cost of Service Report filed in this case?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to discuss the in-service evaluation of the O'Fallon Renewable Energy Center. At the time direct testimony was filed in this case, the O'Fallon Renewable Energy Center in-service evaluation was not complete. Subsequent to the filing of direct testimony, the O'Fallon Renewable Energy Center has satisfactorily met the in-service criteria and should be considered "fully operational and used for service."

**PROJECT DESCRIPTION**

Q. Please describe the project designated as the O'Fallon Renewable Energy Center.

A. O'Fallon Renewable Energy Center, a 5.7 megawatt ("MW") direct current ("DC") utility-scale solar facility, is located in O'Fallon, Missouri, adjacent to the existing Belleau substation. The facility consists of approximately 19,000 solar panels and three inverters.

1 Q. Have you personally visited the facility being considered in this testimony?

2 A. Yes. I visited the site on September 18, 2014, and on December 12, 2014. The  
3 September 18, 2014 visit was a tour set up for PSC Staff which occurred during construction.  
4 The purpose of the December 12, 2014, site visit was to verify that all major construction  
5 work had been completed. A tour of the project was conducted and all three (3) inverters  
6 were observed during normal operation.

7 **IN-SERVICE CRITERIA**

8 Q. Has the Staff evaluated the O'Fallon Renewable Energy Center utilizing the in-  
9 service criteria proposed in the Staff's Cost of Service Report?

10 A. Yes.

11 Q. What were the results of those evaluations?

12 A. The results are consistent with the in-service criteria proposed in the Staff's  
13 Cost of Service Report. The results of the evaluations are summarized in Schedule CME-1.

14 Q. What is your conclusion regarding in-service criteria for the O'Fallon  
15 Renewable Energy Center?

16 A. Based on my review and analysis of the data and inspection of the facility, the  
17 O'Fallon Renewable Energy Center has met all of the required in-service criteria effective  
18 December 12, 2014. Therefore, I recommend that the O'Fallon Renewable Energy Center be  
19 considered fully operational and used for service.

20 Q. Does this conclude your testimony?

21 A. Yes.

**Solar Electrical Generator**  
**In-Service Test Criteria**  
**O’Fallon Renewable Energy Center**

1. All major construction work is complete.

*Based on personal observations of the facility on December 12, 2014, all major construction work is complete.*

2. All preoperational tests have been successfully completed.

*Based on review of the Draker Commissioning Report and Inverter Commission Checklists for all three inverters, preoperational tests have been successfully completed.*

3. Facility successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.

*Applicable operational contract guarantees have been satisfied.*

4. 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.

*Based on data obtained from November 9, 2014 through November 11, 2014, the unit produced power when sunlight was shining on it.*

5. Facility shall meet at least 95% of the guaranteed capacity (4.5 MW AC) based on the Capacity Test as outlined in the contract or amended contract. The Capacity Test shall determine the facility’s Corrected Capacity at the Design Point Conditions.

*Based on data obtained from 9:00 AM, November 9, 2014 through, 6:30 PM November 16, 2014, the facility met at least 95% of the guaranteed capacity based on the Capacity Test.*

6. 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.

*Based on review of the Belleau Solar Photovoltaic (PV) Project Interconnection study, data, drawings, and other information related to the interconnection of the generating units to the distribution system, there is sufficient interconnection capacity.*

7. 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.

*Based on review of the Belleau Solar Photovoltaic (PV) Project Interconnection study, data, drawings, and other information related to the distribution facilities connecting to the utility service territory, there is sufficient interconnection capacity.*