

Exhibit No.:
Issues: *Labadie Landfill*
Witness: *Claire M. Eubanks, P.E.*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2016-0179*
Date Testimony Prepared: *January 20, 2017*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENGINEERING ANALYSIS UNIT

REBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, P.E.

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. ER-2016-0179

Jefferson City, Missouri
January 2017

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **CLAIRE M. EUBANKS**

4 **UNION ELECTRIC COMPANY**

5 **d/b/a Ameren Missouri**

6 **CASE NO. ER-2016-0179**

7 Q. Please state your name and business address.

8 A. 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 A. I am employed by the Missouri Public Service Commission (“Commission”)
12 as a Utility Regulatory Engineer II in the Engineering Analysis Unit, Operational Analysis
13 Department, Commission Staff Division.

14 Q. What is the purpose of your Rebuttal testimony?

15 A. The purpose of my rebuttal testimony is to discuss the in-service of the
16 Labadie Utility Waste Landfill. At the time direct testimony was filed in this case, it was
17 unclear whether Ameren Missouri had received its Operating Permit for the initial phase of
18 construction of the Labadie Utility Waste Landfill (Cell 1 and Pond 1). Subsequent to the
19 preparation of Staff’s direct testimony, Ameren Missouri responded to Staff Data Requests,
20 providing the Missouri Department of Natural Resources (“MDNR”) Operating Permit and
21 indicating that placement of ash began November 9, 2016. Therefore, Staff recommends that
22 the Cell 1 and Pond 1 be considered fully operational and used for service.

1 Q. Please describe the Labadie Utility Waste Landfill.

2 A. The Labadie Utility Waste Landfill is a disposal area located near Ameren
3 Missouri's Labadie Coal Plant which is being used to dispose of coal combustion products
4 (CCPs). The Commission granted Ameren Missouri a Certificate of Convenience and
5 Necessity, effective July 17, 2014, in Case Number EA-2012-0281, to expand its boundaries
6 of its existing Labadie Energy Center for the purpose of constructing and operating a utility
7 waste landfill and other plant related activities. The disposal area will be approximately 166
8 acres in total and constructed in phases. During 2016, the initial phase of construction
9 occurred which included approximately 31 acres and a sedimentation pond.

10 Q. What is your conclusion regarding whether the Labadie Utility Waste Landfill
11 Cell 1 and Pond 1 should be considered in-service?

12 A. Based on Ameren Missouri's response to Staff Data Requests 515 and 515.1,
13 Ameren Missouri has obtained the necessary Operating Permit for Cell 1 and Pond 1 from
14 MDNR and began utilizing Cell 1 for ash placement on November 9, 2016. Therefore, I
15 recommend that the Labadie Utility Waste Landfill Cell 1 and Pond 1 be considered fully
16 operational and used for service.

17 Q. Does this conclude your testimony?

18 A. Yes.

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 Increase) Case No. ER-2016-0179
Its Revenues for Electric Service)
)

AFFIDAVIT OF CLAIRE M. EUBANKS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

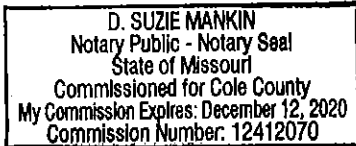
COMES NOW CLAIRE M. EUBANKS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Rebuttal Testimony; and that the same is true and correct according to her best knowledge and belief.

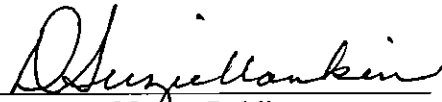
Further the Affiant sayeth not.


CLAIRE M. EUBANKS, 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 19th day of January, 2017.




Notary Public