Exhibit No. 229

Commission Staff – Exhibit 229 Claire M. Eubanks True Up Direct Testimony File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:

South St. Louis Issue(s):

> Renewable Energy Center in-service

criteria

Witness:

Claire M. Eubanks, PE

Sponsoring Party: Type of Exhibit:

MoPSC Staff True-Up Direct

Testimony

Case No.:

ER-2021-0240

Date Testimony Prepared:

November 5, 2021

MISSOURI PUBLIC SERVICE COMMISSION INDUSTRY ANALYSIS DIVISION ENGINEERING ANALYSIS DEPARTMENT

TRUE-UP DIRECT TESTIMONY

OF

CLAIRE M. EUBANKS, PE

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

CASE NO. ER-2021-0240

Jefferson City, Missouri November 2021

1		TRUE-UP DIRECT TESTIMONY	
2		\mathbf{OF}	
3		CLAIRE M. EUBANKS, PE	
4 5		UNION ELECTRIC COMPANY, d/b/a Ameren Missouri	
6		CASE NO. ER-2021-0240	
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") as	
12	the Manager	of the Engineering Analysis Department, Industry Analysis Division.	
13	Q.	Are you the same Claire Eubanks who contributed to Staff's Direct Cost of	
14	Service Report and wrote rebuttal testimony in this case?		
15	A.	Yes.	
16	Q.	What is the purpose of your True-up Direct Testimony?	
17	A.	In Staff's Direct Cost of Service report, I recommended Ameren Missouri	
18	demonstrate that the South St. Louis Renewable Energy Center meet the solar in-service		
19	criteria contained in Schedule CME-d1 (attached to Staff's Direct Cost of Service Report)		
20	by the true-up cutoff date, September 30, 2021, to include the solar facility in rate base		
21	Ameren Missouri provided a response to Staff data request 432.1 on July 16, 2021, and		
22	supplemented the response on August 12, 2021, with the information necessary for Staff to		
23	review the in-service criteria for this facility.		
24	Q.	Please describe the South St. Louis Renewable Energy Center.	

A.	The South St. Louis Renewable Energy Center is a 192 kW-AC solar facility				
and part of An	and part of Ameren Missouri's Neighborhood Solar program. The South St. Louis Renewable				
Energy Center	Energy Center consists of solar panels mounted on canopy structures and inverters.				
Q. What are the recommended in-service criteria?					
A.	The recommended criteria are:				
	 All major construction work is complete. All preoperational tests have been successfully completed. The facility meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list. 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. Facility shall meet at least 95% of the guaranteed capacity (in MW AC) based on the Capacity Test. The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions. 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. 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. 				
Q.	Have all the above listed in-service criteria been met?				
A.	A. Yes.				
Q.	What is your recommendation regarding whether South St. Louis Renewable				
Energy Center is in service or not?					
Α.	I recommend the Commission find the South St. Louis Renewable Energy				
Center fully operational and used for service as of July 21, 2021.					
1 **					

True-Up Direct Testimony of Claire M. Eubanks, PE

1	Q.	What information did you review?	
2	A.	I reviewed the following studies and reports:	
3 4 5 6		 Completed System Start-up Test Procedures Pre-substantial Completion Report Substantial Completion Certificate Generation Interconnection Study Report 	
7	Q.	Please describe how these reports demonstrate the solar facility is fully	
8	operational and used for service.		
9	A.	**	
10			
11			
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18		**	
19	Q.	Does this conclude your true-up direct testimony?	
20	. A.	Yes.	
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BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company

d/b/a Ameren Missouri's Tariffs Revenues for Electric Service	s to Adjust Its) Case No. ER-2021-0240				
AFFIDAVIT OF CLAIRE M. EUBANKS, PE					
STATE OF MISSOURI) COUNTY OF COLE)	SS.				
and lawful age; that she co Claire M. Eubanks, PE; and that and belief.	UBANKS, PE, and on her oath declares that she is of sound mind ontributed to the foregoing True-Up Direct Testimony of at the same is true and correct according to her best knowledge.				
Further the Affiant sayeth not	Clair M Edsauks 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 Miss	souri, at my office in Jefferson City, on this 44 day of				

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

November, 2021.

Notary Public