

Exhibit No. 229

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

Exhibit No.:

Issue(s): South St. Louis
Renewable Energy
Center in-service
criteria

Witness: Claire M. Eubanks, PE

Sponsoring Party: MoPSC Staff

Type of Exhibit: 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*

**** Denotes Confidential Information ****

1 A. The South St. Louis Renewable Energy Center is a 192 kW-AC solar facility
2 and part of Ameren Missouri's Neighborhood Solar program. The South St. Louis Renewable
3 Energy Center consists of solar panels mounted on canopy structures and inverters.

4 Q. What are the recommended in-service criteria?

5 A. The recommended criteria are:

- 6 1. All major construction work is complete.
- 7 2. All preoperational tests have been successfully completed.
- 8 3. The facility meets contract operational guarantees that are necessary
9 for satisfactory completion of all other items in this list.
- 10 4. Upon observation of the facility for 72 consecutive hours the facility
11 will have demonstrated that when sunlight was shining on it during
12 that period it produced power in a standard operating mode.
- 13 5. Facility shall meet at least 95% of the guaranteed capacity (in MW
14 AC) based on the Capacity Test.¹ The Capacity Test shall determine
15 the facility's Corrected Capacity at the Design Point Conditions.
- 16 6. Sufficient transmission/distribution interconnection facilities shall
17 exist for the total plant design net electrical capacity at the time the
18 facility is declared fully operational and used for service.
- 19 7. Sufficient transmission/distribution facilities shall exist for the total
20 plant design net electrical capacity into the utility service territory at
21 the time the facility is declared fully operational and used for service.

22
23 Q. Have all the above listed in-service criteria been met?

24 A. Yes.

25 Q. What is your recommendation regarding whether South St. Louis Renewable
26 Energy Center is in service or not?

27 A. I recommend the Commission find the South St. Louis Renewable Energy
28 Center fully operational and used for service as of July 21, 2021.

1 **

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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 • Completed System Start-up Test Procedures
4 • Pre-substantial Completion Report
5 • Substantial Completion Certificate
6 • 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. ** [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] **

19 Q. Does this conclude your true-up direct testimony?

20 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 Adjust Its) Case No. ER-2021-0240
Revenues for Electric Service)

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CLAIRE M. EUBANKS, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Direct Testimony of Claire M. Eubanks, PE*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Claire M Eubanks
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 4th day of November, 2021.

Dianna L. Vaught
Notary Public

