

## Exhibit No. 216

Commission Staff – Exhibit 216  
Shawn E. Lange  
Rebuttal Testimony  
File Nos. ER-2021-0240 & GR-2021-0241

*Exhibit No.:*  
*Issue(s):* *In Service*  
*Witness:* *Shawn E. Lange*  
*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**

**SHAWN E. LANGE**

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

**CASE NO. ER-2021-0240**

*Jefferson City, Missouri  
October 2021*

**\*\* Denotes Confidential Information \*\***

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

**REBUTTAL TESTIMONY**

**OF**

**SHAWN E. LANGE**

**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 Shawn E. Lange and my business address is Missouri Public Service Commission, P.O. Box 360, Jefferson City, MO 65102.

Q. Are you the same Shawn E. Lange 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 Atchison Wind Farm as well as an update to Staff's physical bilateral adjustment amount.

Q. What was Staff's position at direct?

A. \*\* [REDACTED]

[REDACTED] \*\*

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

Rebuttal Testimony of  
Shawn E. Lange

1           A.     Staff requested and reviewed additional information and verified information  
2 from Ameren Missouri regarding the satisfaction of term 2.c. of the jointly submitted in-service  
3 criteria.

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

5           A.     Term 2.c. requires each item on the Mechanical Completion Checklist to have  
6 been satisfied and proof that the turbine is ready to commence commissioning.<sup>1</sup>

7           Q.     What additional information did Ameren Missouri provide?

8           A.     Ameren Missouri's response to Staff DRs 762.1 received on September 3, 2021  
9 and September 29, 2021, and 762.2 on September 20, 2021 for Atchison provided additional  
10 information on the items that were not identified as closed in Ameren Missouri's response to  
11 Staff DR 762.1.

12          Q.     Did the information provided by Ameren Missouri in response to Staff DRs  
13 762.1 and 762.2 show any open items?

14          A.     \*\* [REDACTED]  
15 [REDACTED]. \*\*

16          Q.     Why were these items open?

17          A.     As part of Ameren Missouri's response to Staff DR 762.1, Ameren stated:

18                 \*\* [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]. \*\*

---

<sup>1</sup> 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  
Shawn E. Lange

1 Q. What is Staff's position on in-service for Atchison?

2 A. \*\* [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]. \*\*

10 Q. How much of the installed capacity of Atchison is fully operational and used for  
11 service?

12 A. Staff considers \*\* [REDACTED] \*\* have met the in-service criteria and are fully  
13 operational and used for service.

14 **Bilateral Adjustment Correction**

15 Q. Is there anything else you would like to address?

16 A. Yes, subsequent to filing direct, an error was found in Staff's calculation of the  
17 adjustment for physical bilateral adjustment. Instead of calculating the physical bilateral  
18 adjustment solely on bilateral data, Staff's adjustment took into account the adjustment for  
19 financial swaps as well. This would have resulted in the doubled counting of the financial  
20 swaps, first in the financial swaps adjustment as well as in the bilateral adjustment.

21 Q. What is Staff's updated physical bilateral adjustment value?

Rebuttal Testimony of  
Shawn E. Lange

1           A.     Staff's Direct value was \*\* [REDACTED] \*\*. The correction resulted in an  
2 adjustment of \*\* [REDACTED] \*\*. Staff's updated value is \*\* [REDACTED] \*\*. Staff provided  
3 the updated value to auditing for inclusion in Staff's CCOS.

4           Q.     Does this conclude your rebuttal testimony?

5           A.     Yes, it does.