

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

In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for Permission and )  
Approval and a Certificate of Public Convenience and ) File No. EA-2016-0207  
Necessity Authorizing it to Offer a Pilot Subscriber )  
Solar Program and File Associated Tariff. )

**RESPONSE TO RECOMMENDATIONS OF STAFF AND THE OPC**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Applicant" or "the Company") and hereby submits to the Missouri Public Service Commission ("Commission") its *Response to Recommendations of Staff and the OPC* ("Response"). In support of its *Response*, Ameren Missouri states as follows:

1. On March 7, 2018, Ameren Missouri filed an *Expedited Application for Certificate of Convenience and Necessity* ("Application").

2. On April 23, 2018, the Staff of the Missouri Public Service Commission ("Staff") filed *Staff's Recommendation to Reject Application* ("Staff Recommendation"). On April 24, 2018, the Office of the Public Counsel ("OPC") filed *The Office of the Public Counsel's Concurrence in Staff's Recommendation to Reject Application*. Both filings pointed to the fact that the parties had entered into a *Non-Unanimous Stipulation and Agreement* ("Agreement"), later approved by the Commission, which required Ameren Missouri's to construct two 500 kW facilities instead of a single solar facility of approximately a MW. The Staff Recommendation also contained some technical issues that it felt Ameren Missouri needed to address.

3. Ameren Missouri, after obtaining a bid for the facility, realized there was a significant price differential between the two approaches (construction of two 500 kW versus constructing the entire 1 MW at one time), something it had not contemplated when it entered into

the Agreement. Unfortunately, this realization was not discussed with the signatories to the Agreement in this case prior to filing its Application.

4. Staff's Recommendation indicates it is open to amending the Agreement in this case to allow for construction of a 1 MW facility rather than two 500 kW facilities. Ameren Missouri believes it can reach such an agreement with the signatories to the Agreement, although it has not yet had time to do so. The Company is also in conversations with OPC, who is not a signatory to the Agreement, about the issue.

5. The Commission has already suspended the tariffs in this case until August of 2018. Rather than rejecting the tariffs, Ameren Missouri asks for time to work through this difference (and the other items listed in the Staff Recommendation) with the parties to this case. The Company hopes to file an Amended Stipulation and Agreement within the next two weeks.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission grant Ameren Missouri additional time, until May 14, 2018, in order to determine if a resolution to the concerns raised by Staff and OPC can be resolved and an Amended Stipulation and Agreement can be filed.

Respectfully submitted,

/s/ Wendy K. Tatro

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

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 30<sup>th</sup> day of April, 2018.

/s/ Wendy K. Tatro  
Wendy K. Tatro