

**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-2018-0202
Necessity Authorizing it to Construct a Wind Generation)
Facility.)

**JOINT SUBMITTAL OF IN-SERVICE CRITERIA
AND MOTION TO ACCEPT LATE-FILING**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and the Staff of the Missouri Public Service Commission (“Staff”), and pursuant to ¶ 9 of the Third Stipulation and Agreement submitted in this case and approved by the Commission on October 24, 2018, submits the agreed-upon in-service criteria contemplated by ¶ 9 and requests that the Commission accept the submission at this time. With respect to this submission and request, the Company and Staff state as follows:

1. Paragraph 9 of the Third Stipulation and Agreement required that in-service criteria be agreed-upon and filed with the Commission by December 31, 2018, and indicated that the Company and the Staff, and if another Signatory desired to be involved, other Signatories, would work together reasonably and in good faith to agree on in-service criteria.
2. Staff and the Company did work together (no other Signatory expressed interest) and reached agreement on in-service criteria just before the Christmas holiday. Subsequently, the agreed-upon criteria were provided to the other Signatories, none of whom provided any comments.
3. The Company and the Staff apologize for the tardiness of this submission, but respectfully suggest that the approximately 3-week delay in submission produces no harm or

prejudice in that the criteria have been successfully agreed upon and it will not be necessary to apply them until sometime in 2020 when the facility is slated to begin testing and operation.

WHEREFORE, Ameren Missouri and Staff submit the agreed-upon in-service criteria and request leave to late-file this submission.

Respectfully submitted:

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
SMITH LEWIS, LLP
P. O. Box 918
Columbia, MO 65205
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com

/s/ Wendy K. Tatro

Wendy K. Tatro, Mo. Bar #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1301
St. Louis, MO 63103
(T) (314) 554-3484
(F) (314) 554-4014
AmerenMOService@ameren.com

*Attorneys for Union Electric Company
d/b/a Ameren Missouri*

/s/ Nicole mers

Nicole Mers, Mo. Bar #66766
Staff Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(T) 573-751-6651
(F) 573-751-9285
Nicole.mers@psc.mo.gov
*Attorney for the Staff of
Missouri Public Service Commission*

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 22nd day of January, 2019.

/s/James B. Lowery
James B. Lowery

Wind Turbine In-Service Criteria

1. For each wind turbine to be considered for inclusion in rate base, the criteria in part 2, 3, 4, 5, and 6 shall be met.
2. Mechanical completion has been achieved, meaning:
 - a. The turbine and its support tower are assembled, erected, and installed in accordance with the turbine supplier's technical specifications and quality assurance procedures;
 - b. Utility has installed, or caused to be installed, all necessary communication facilities needed to achieve SCADA functionality; and
 - c. Each item on the Mechanical Completion Checklist has been satisfied and the turbine is ready to commence commissioning.
3. The turbine has been commissioned and a Commissioning Completion Certificate has been completed.
4. An operational test of the turbine as outlined in this part 4 has been successfully completed on at least ten percent of the total number of turbines in a Wind Farm for which a Commissioning Completion Certificate has been issued for each such turbine. The operational test shall be completed using the plant SCADA and turbine-mounted sensing and monitoring equipment. Each tested turbine shall have sustained for two consecutive hours a power output of at least 90% of the turbine supplier's guaranteed output as determined by wind speed observed at or above the Predicted Mean Turbine Hub-height Wind Speed and the Air Density, subject to the following:
 - a. Failure of any turbine to achieve the operational test provided for by this part 4 shall mean that the turbine shall be repaired, if needed, and retested. In addition, the test population size shall be increased from ten percent to twenty percent and each of the tested turbines shall comply with this part 4.
5. Sufficient Interconnection Facilities exist to carry the Wind Farm energy output at the nameplate capacity from the completed turbines into the distribution/transmission system at the point of interconnection, the turbines have been synchronized to the grid, and conditional energy resource interconnection service (ERIS) is available on the transmission system.

6. Review of operating Data. The Company will provide Operating Data for each commissioned turbine and its review of such data. The Company's review will be certified by a Professional Engineer licensed in the State of Missouri.

7. Definitions:

- a. "Air Density" shall mean the average air density at average hub elevation as determined by the wind resource assessment report or by field measurement equipment.
- b. "Commissioning Completion Certificate" has the meaning given it in the Turbine Supply Agreement.
- c. "ERIS" means conditional Energy Resource Interconnection Service as defined in Attachment X, Appendix 6, of the Midcontinent Independent System Operator, Inc.'s FERC Electric Tariff (Generator Interconnection Agreement).
- d. "Interconnection Facilities" shall mean those facilities that interconnect the Wind Farm generator step-up transformer high voltage terminals to the point of interconnection to the grid.
- e. "Mechanical Completion Checklist" has the meaning given it in the Turbine Supply Agreement.
- f. "Operating Data" shall mean the quantity of electricity produced by each Turbine, the average wind speed at each Turbine, and the output voltage at each Turbine, in each case on an hourly interval.
- g. "Predicted Mean Turbine Hub-height Wind Speed" shall mean the mean wind speed at the turbine's hub height as predicted in the pre-construction wind resource assessment.
- h. "Wind Farm" shall mean a collection of completed wind turbine generators aggregated into one point of interconnection to the grid.