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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2014-0258

REBUTTAL TESTIMONY

OF

DENNIS W. WEISENBORN

ON

BEHALF OF

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

St. Louis, Missouri
January 2015

UE Exhibit No. 51
Date 3-12-15 Reporter KF
File No. ER-2014-0258

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REBUTTAL TESTIMONY
OF
DENNIS W. WEISENBORN
FILE NO. ER-2014-0258

Q. Please state your name and business address.

A. Dennis W. Weisenborn, One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and in what position?

A. I am employed by Ameren Services Company ("Ameren Services") as Vice President of Safety & Supply Services. Ameren Services provides corporate support services such as legal, treasury, IT, accounting, safety and supply to Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and its affiliates.

Q. Please describe your educational background, work experience and the duties of your position.

A. I hold Masters degrees in Management and Business from Webster University. I was hired by Union Electric Company in 1985 as a drafter. Over the years, I have held positions of increasing responsibility in the Real Estate and Building Service Departments until my promotion to Vice President of Supply Services in 2003. In that position, I lead the Real Estate, Building Service, Sourcing, Supply Chain Operations, and Supplier Diversity Departments. In the second quarter of 2012 and in addition to my existing leadership responsibilities, I was asked to lead the development of a new safety culture across Ameren. Later in 2012, the Corporate Safety Department was added to my

1 responsibilities and I was promoted to Vice President of Safety and Supply Services. In
2 this position, I am responsible for the performance and continuous improvement of these
3 business services.

4 **Q. What is the purpose of your rebuttal testimony in this proceeding?**

5 A. The purpose of my rebuttal testimony is to provide the Missouri Public
6 Service Commission (“Commission”) with a greater understanding of the steps that have
7 been taken to ensure that safety is a primary focus for all employees. The Commission
8 Staff (“Staff”) recommended disallowance of a portion of the Company’s incentive
9 compensation (Executive Incentive Plan for Officers, or “EIP-O”) because, as Staff
10 witness Sarah Sharpe explains, it is an effort undertaken not just for Ameren Missouri’s
11 electric operation but for and across all of the Ameren affiliates. While it is true that the
12 EIP-O does not just apply to Ameren Missouri executives, it is not true that this means
13 that the EIP-O costs are not beneficial to Ameren Missouri and its customers.

14 **Q. What is the EIP-O?**

15 A. Ameren Missouri witness Krista Bauer testifies about the incentive plans
16 in her rebuttal testimony and is the person to ask about the details of the plan; but, at a
17 high level, the EIP-O is a short-term incentive plan for Ameren officers that has been in
18 effect since January 1, 2013. 90% of the award is based on Ameren Corporation’s
19 earnings per share (“EPS”) performance metrics and 10% of the award is based on a
20 safety metric—lost workday away (“LWA”) incidents—that occur for the entire Ameren
21 family of employees. The EPS and LWA performance metrics each have an annual
22 threshold, target and maximum level that will set the overall incentive compensation.
23 Ameren Missouri recognizes that the Commission has historically found that EPS is not

1 an incentive compensation metric for which it will allow rate recovery, and is not seeking
2 to include the EPS-based portion of the EIP-O compensation in its revenue requirement
3 in this case. Safety, however, is vital to the well-being of all of our employees and
4 operational excellence. When we operate more safely, we are more effective in
5 delivering service to our customers at a lower cost. There is no basis for concluding that
6 the legitimate compensation related to promoting safety and improving our safety
7 performance should be disallowed from our revenue requirement, as the Staff is
8 suggesting. In fact, Staff commends the action to modify the EIP-O to link employee
9 safety with officer incentive compensation awards, but then offers the opinion that "the
10 EIP-O in effect does not connect officer actions to safe, regulated, electric-only, Missouri
11 operations and in Staff's opinion, should not be included in the cost of service of an
12 electric Ameren Missouri rate case." ¹

13 **Q. Do you agree with the Staff's statement you quote above?**

14 A. I absolutely do not. Making a portion of officers' incentive compensation
15 dependent upon a safety metric was the next logical step in Ameren's renewed emphasis
16 on safety. I would note that the Staff's opinion is just that; an opinion, and Staff has
17 provided no basis for it.

18 **Q. Can you provide the Commission with some history on how and why**
19 **a renewed emphasis on safety was undertaken by Ameren?**

20 A. In 2012, after several serious injuries, including a fatal incident that
21 resulted in the death of a Labadie Energy Center employee and a life-changing event at
22 the Keokuk Energy Center, a cross-segment and cross-functional team (Ameren Safety
23 Leadership Team) of management and bargaining unit personnel was formed to improve

¹ Staff Report Revenue Requirement Cost of Service, December 5, 2014, p. 101, l. 20 through p. 102, l. 1.

1 the Ameren safety culture. While less serious Occupational Safety and Health
2 Administration ("OSHA") Recordable cases had been reduced substantially over the past
3 five or more years, the trend for the more serious LWA cases and the existence of fatal
4 injuries or "life changing events" had flattened or increased slightly.

5 **Figure 1**



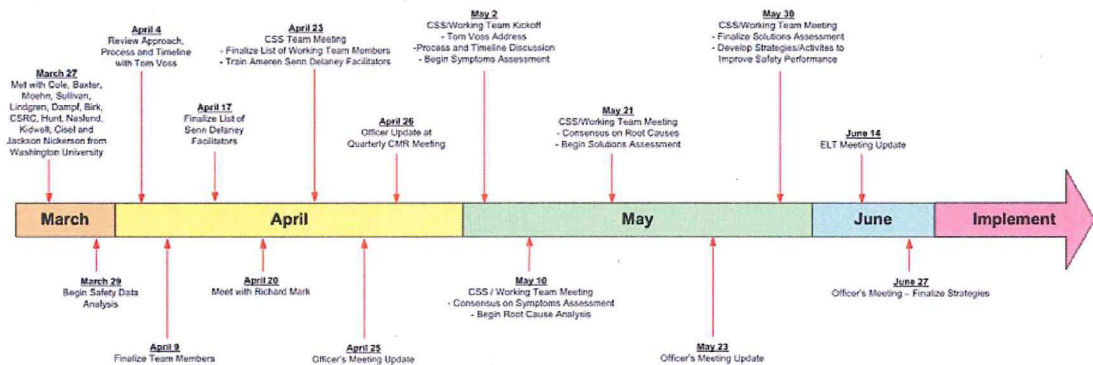
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7 **Q. After this realization was reached, what steps did Ameren take to**
8 **address safety across the entire organization?**

9 A. It was decided to implement this culture change initiative across all of the
10 Ameren companies, as the safety of employees is of paramount importance in all
11 companies, not just at Ameren Missouri. The Ameren Safety Leadership Team, as it was
12 called, implemented the Collaborative Structured Inquiry ("CSI") process for solving
13 complex problems and leading change. This process was developed by Washington
14 University professor Dr. Jackson Nickerson to assess, analyze, and develop a going-
15 forward Ameren safety strategy. Over 60 co-workers in five working teams, each

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1 representing a cross-section of Ameren (Ameren Missouri, Ameren Illinois, Ameren
2 Services, generation, energy delivery, management and bargaining unit), worked
3 independently and parallel with each other throughout the process.

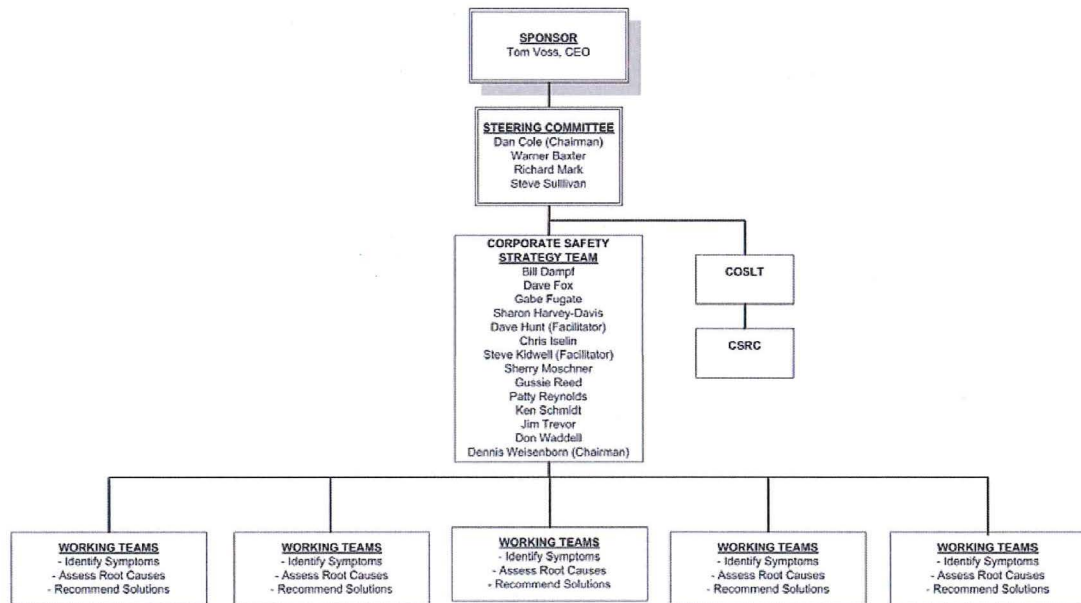
4 **Corporate Safety Strategy- Timeline**



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Ameren Safety Leadership Team Structure



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8 Over the course of the next several months, the Ameren Safety Leadership Team
9 met and participated in the CSI process, assessed and provided supporting data and
10 experiences, and reached consensus on the symptoms of the Ameren safety culture.
11 Examples of symptoms of the Ameren safety culture at the time were:

- 1 • The Job Behavior Observation (“JBO”) process was perceived negatively and
2 very few unsafe acts were being documented;
- 3 • Communication gaps between experienced co-workers and apprentices;
- 4 • Most injuries were occurring during routine job assignments;
- 5 • Co-workers appeared willing to take unacceptable risks;
- 6 • Low engagement involving hazard recognition during the Job Safety Briefing
7 (“JSB”) process;
- 8 • Post-job feedback reviews were not effectively implemented or communicated;
- 9 • Workgroups tended to be consistently good or consistently poor;
- 10 • Not effectively learning from prior injuries or incidents;
- 11 • Workers were unwilling or reluctant to intervene when noticing unsafe acts;
- 12 • Appeared to be a behavior of speed/performance over safety;
- 13 • The collection and use of data was insufficient to identify trends;
- 14 • Inconsistent safety processes across Ameren (briefings, observations, incident
15 investigation, fall protection, gloving);
- 16 • The number of safety programs and initiatives had increased;
- 17 • The number of Recordables continued to decline while the more serious injuries
18 had not;
- 19 • Roles and responsibilities involving safety were not clearly defined; and
- 20 • Safety messaging and participation from senior management and labor leaders
21 was inconsistent.

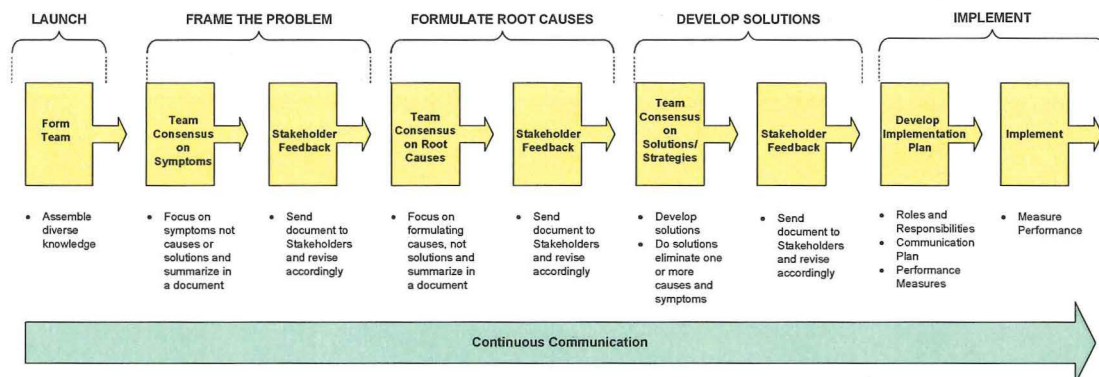
22 The Ameren Safety Leadership Team then met and continued their participation
23 in the CSI process and reached a consensus on the causes associated with the previously-
24 identified symptoms. The focus shifted to not just "what" but "why" co-workers were
25 being seriously injured and not returning home to their families each day the way they
26 had arrived on the job for the start of their shift. Examples of these causes were:

- 1 • Lack of accountability for personal and co-worker safety;
- 2 • Segmented structure does not foster information sharing and consistent processes;
- 3 • Lack of alignment between management leadership, bargaining unit leadership,
4 and bargaining unit represented co-workers;
- 5 • The cause of safety incidents was not being properly classified;
- 6 • Co-workers avoid confrontation and intervention;
- 7 • Co-workers perform their work with a wide margin of risk tolerance;
- 8 • Lack of consistency in policies and programs causes inconsistent training;
- 9 • Executive incentive compensation system was based on financial and not safety
10 performance;
- 11 • Executive leadership had not had the desired impact on safety performance due to
12 low and inconsistent participation;
- 13 • Co-worker complacency performing repetitive or routine tasks;
- 14 • Low focus on human behaviors vs. technical training (Thinking drives Behaviors
15 drives Results);
- 16 • Overall reward system was based primarily on down-stream results;
- 17 • Some supervisors are technically proficient but people leadership skill sets were
18 not as strong;
- 19 • JSB process was inconsistent and ineffective;
- 20 • Situational awareness and hazard recognition skills were inconsistent; and
- 21 • The corporate safety organization was not effective at driving consistency and
22 leading change.

23 Next, the Ameren Safety Leadership Team met and developed actionable
24 solutions as part of the strategy that, when implemented, would begin a journey to
25 substantially increase alignment, engagement, and operational excellence. Safety
26 performance is the first aspect of operational excellence.

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Process



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The many recommendations developed by the Ameren Safety Leadership Team fell in six

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key areas of focus that collectively formed Ameren's new safety strategy. These include:

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1. Communication;

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2. Critical Safety Processes;

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3. Education;

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4. Management and Bargaining Unit Alignment;

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5. Rewards and Recognition; and

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6. Corporate Safety Organization.

11

These key areas operate as a system where each area was influenced and continues to be

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influenced by the others. The Ameren Safety Leadership Team referred to this system as

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the "Web of Safety." Ameren believes that consistently implementing the action items

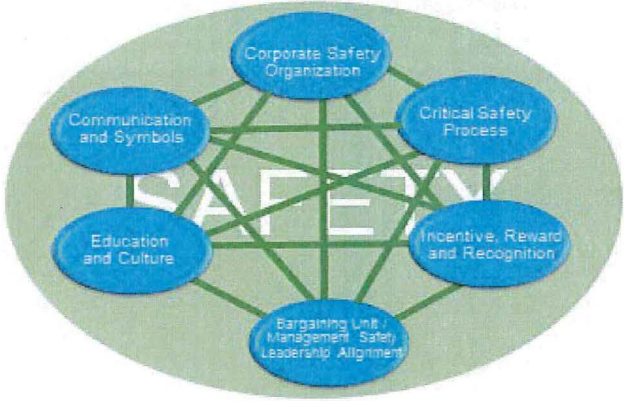
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associated with the Web of Safety throughout the Company will positively shift the

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safety culture and yield the desired reduction in serious injuries.

“Web” of Safety – Integrated system of “Processes” and “Best Practices”
Culture / Consistency / Communication



1

2 **Q. Did the Ameren Safety Leadership Team identify specific actions to**
3 **be taken to develop this Web of Safety?**

4 A. Yes. Actionable deliverables were identified for each key area of the Web
5 of Safety. Examples of the solutions by focus area are included in Schedule DWW-R1.
6 Ameren leadership has invested and continues to invest significant time and resources to
7 re-vamp the safety culture. Now our focus on safety is everywhere; in meetings, in
8 publications, in vision posters and in our actions throughout the workplace. In one of its
9 Data Requests, Staff requested all of the safety presentations of the Ameren officers over
10 the past two years, which totaled over 200. And while that evidenced part of the officer
11 engagement, of more importance is the officer collaboration, approval, ownership, and
12 demand that the actions within those presentations associated with the new Ameren
13 safety strategy be implemented. This work is all part of the process of developing a
14 safety culture at Ameren to reduce and ultimately eliminate serious injuries.

1 **Q. What are some of the changes that resulted from the Ameren Safety**
2 **Leadership Team’s work?**

3 A. There have been numerous changes, all of which are helping to drive a
4 culture of safety across Ameren. For example, process changes were made to incorporate
5 additional safety-related measures into job briefing, job observation and incident
6 investigations. Employee communication was redesigned to incorporate safety messages.
7 Also, educational curricula were developed for management and workers, and steps were
8 taken to align bargaining unit and management to support safety initiatives. And finally,
9 organizational changes were made to reflect a greater emphasis on safety culture. Details
10 on those changes are contained in Schedule DWW-R2.

11 **Q. How does this work tie into the EIP-O compensation that is at issue in**
12 **this case?**

13 A. As explained above, Ameren looked across the companies to find all of
14 the ways to emphasize safety and establish the Web of Safety discussed above. The
15 inclusion of measurable safety results as criteria for an incentive reward brings visibility,
16 evidences commitment and further focuses Ameren officers, including Ameren
17 Missouri’s officers, on safety and on developing the culture and Web of Safety necessary
18 to keep employees safe at work. Staff was correct in commending Ameren's actions to
19 modify its EIP-O to link employee safety with officer incentive compensation awards.
20 But, Staff's opinion that these costs should be disallowed simply because the plan is
21 across all of the Ameren companies instead of residing solely at Ameren Missouri does
22 not make sense, and does not recognize that the EIP-O connects officer actions to safe
23 operations at Ameren Missouri. Staff's position also does not recognize that

1 implementing the culture of safety across the Ameren organization enhances officers'
2 ability to challenge norms and each other, collaborate to identify best safety practices and
3 leverage excellent performance, align and influence outcomes, provide the necessary
4 resources, structure, engagement, including their own, to implement the new safety
5 strategy and positively shift organizational safety culture. We are seeking to create and
6 maintain a culture where every co-worker is focused on safety; where unsafe acts are not
7 committed; where every employee is expected to challenge any unsafe act and complete
8 each work day safely; and where every employee returns home safe each day to their
9 family the way they had left their home earlier that day. Incenting the leaders of the
10 organization to promote such a culture is beneficial to Ameren Missouri and ultimately to
11 its customers as well.

12 **Q. Is there support for this approach in safety literature?**

13 A. Yes. In its Safety Handbook under the subheading "*Creating a Safety*
14 *Culture, Align the Organization*", the United States Department of Labor, Occupational
15 Safety and Health Administration writes:

16 "Align the Organization by establishing a shared vision of
17 safety and health goals and objectives vs. production.
18 Upper management must be willing to support by providing
19 resources (time) and holding managers and supervisors
20 accountable for doing the same. The entire management
21 and supervisory staff need to set the example and lead the
22 change. It's more about leadership than management."

23 In the article *What Is At Stake*, and under the subheading "*Who Is Responsible for*
24 *Safety Culture?*", the Center for Chemical Process Safety indicates that:

25 "The leadership of an organization has the primary
26 responsibility for identifying the need for, and fostering,
27 culture change and for sustaining a sound safety culture
28 once it is established."

1 Mr. Greg Martin is former Chief Safety Officer for Baltimore Gas & Electric and
2 now is a principal consultant with DuPont Safety Resources, focusing on the utilities
3 industry. In his article entitled *The Need for Safety Culture in the Utilities Industry*,
4 Mr. Martin writes:

5 "The biggest challenge to creating a safety culture is
6 instilling felt leadership; that is, ensuring that employees
7 know that company leaders are unwaveringly committed to
8 safety no matter the business conditions. This is
9 particularly necessary within companies such as utilities
10 where there are many layers of employees. Leaders must
11 demonstrate through their actions that every time a decision
12 requires a choice between safety and productivity, for
13 example, the choice is safety. When employees believe
14 that their safety and health is a top priority, a cultural
15 transformation can occur."

16 Mr. Martin adds:

17 "Three factors are essential to creating a safety culture that
18 underpins excellent performance: leadership, structure and
19 action." In his conclusion, Mr. Martin notes, "It is the
20 responsibility of business leadership to embrace and drive
21 the safety culture change, to support the necessary
22 investment and to help their organizations move to a
23 position of zero workplace accidents and injuries."

24 By ensuring alignment on the desired safety culture, putting a strategy in place to
25 achieve our goal of reducing serious injuries and linking officer compensation to that
26 result, we bring important visibility to that fact and ensure that our executives are aligned
27 and focused on this performance.

28 **Q. Does Ameren expect this renewed and changed focus will result in**
29 **fewer injuries?**

30 A. We believe so and that is why we have undertaken the effort. Again, in its
31 Safety Handbook under the subheading, "*Why do you want a strong safety culture*",
32 OSHA writes:

1 "It has been observed at the OSHA VPP sites and
2 confirmed by independent research that developing a strong
3 safety cultures have the single greatest impact on accident
4 reduction of any process. It is for this single reason that
5 developing these cultures should be top priority for all
6 managers and supervisors."

7 In that same OSHA Safety Handbook under the subheading "*What is a safety*
8 *culture – how will it impact my company?*", the Federal Government writes:

9 "Safety cultures consist of shared beliefs, practices, and
10 attitudes that exist at an establishment. Culture is the
11 atmosphere created by those beliefs, attitudes, etc., which
12 shape our behavior." Adding, "A company with a strong
13 safety culture typically experiences few at-risk behaviors;
14 consequently they also experience low accident rates, low
15 turn-over low absenteeism, and high productivity."

16 OSHA adds:

17 "Creating a safety culture takes time. It is frequently a
18 multi-year process. A series of continuous improvement
19 steps can be followed to create a safety culture. Employer
20 and employee commitment are hallmarks of a true safety
21 culture where safety is an integral part of daily operations."

22 The fact is, in 2014, Ameren Missouri achieved its best ever safety performance
23 as evidenced by record-low safety injuries. With 2014 LWAs at five against a target of
24 ten (Ameren Missouri's allocation of the Ameren Corporate target of 21), Ameren
25 Missouri reported top-decile (top 10%) performance in relationship to its Edison Electric
26 Institute ("EEI") peers. That level of performance is a direct result of the shift in safety
27 culture, execution of the new safety strategy and corresponding shift in co-worker
28 thinking and behavior. The Ameren EIP-O incents results, and those results could only
29 occur with a shift in safety culture. That shift in safety culture is evident and directly
30 related to the engagement and actions of the Ameren officers to collaborate and align on

Rebuttal Testimony of
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1 reducing all injuries, including those in regulated, electric-only Ameren Missouri
2 operations.

3 **Q. Does this conclude your rebuttal testimony?**

4 A. Yes, it does.

Ameren Safety Strategy Recommended Solutions

Critical Safety Process

Restructure the Job Briefing process to strengthen and encourage co-worker engagement and personal accountability in risk assessment and mitigation.

- A Job Briefing is a documented conversation regarding the steps required to achieve job completion in a manner that exemplifies "Operational Excellence." This briefing will include specific plans to prevent personal injury, damage to equipment and facilities, as well as the identification of and mitigation of any conditions adverse to job quality and success.
- Promote continuous Job Briefs and Re-Briefs from job assignment to post job critique.
- Ensure that no work proceeds until a Job Brief is conducted and crew members acknowledge understanding of associated hazards and job plan.

Restructure the Job Observation process to encourage employee engagement and personal accountability for safe work practices and policies.

- A Job Observation is the observation of work in progress for the purpose of determining and reinforcing the areas of performance required to attain Operational Excellence. Desired behaviors should be reinforced and undesirable behaviors challenged and changed to eliminate unsafe acts.
- Develop and implement a consistent Job Observation form.
- Develop a central safety data management system.

Develop a consistent approach to investigating incidents to correctively identify causes, take corrective actions, monitor for trends, and communicate lessons learned across business segments.

- Enhance PeopleSoft Form 70 to improve the data collection and incident investigation process.
- Strengthen Ameren's investigation capabilities through cause analysis education.
- Use data analysis, trending and information sharing to promote incident prevention.

Communication and Symbols

Develop and implement a new Ameren safety brand that is consistent throughout the entire company.

- Utilize the "Focused on Safety" brand in safety-related documents, safety presentations, Ameren Journal, and safety education material.

Establish a new Ameren safety vision poster that emphasizes accountability.
Include safety messaging in all training.
All planned and scheduled meetings should also include/start with safety messaging.
Create a consistent format for near miss and incident analysis reporting.
Design a SharePoint site to include relevant safety information
Provide timely communication of performance metrics and data to gauge performance.
Safety communication is a leadership expectation and cascaded down through each business segment.

Education and Culture

Promote a culture of operational excellence and personal accountability for safety using a variety of educational approaches and experiences to affect thinking and behavior.

- Revise the New Employee Orientation (NEO) and onboarding experience to include alignment with safety branding, safety vision, and an Ameren officer and bargaining unit business manager co-led presentation.
- Modify the 2013 and thereafter Values Pules Questionnaire (VPQ) employee engagement tool to include behavioral based questions.
- Develop and implement "Effective Job Planning and Error Prevention" education to support the new Job Briefing process.
- Design and implement co-worker to co-worker (c2c) education to support the new Job Observation process.

Bargaining Unit / Management Safety Leadership Alignment

Establish forums to include management executive and bargaining unit leader to build visible partnership and alignment in driving relentless improvement in safety performance throughout Ameren.

Launch "Leadership for a Safe Ameren" forums and partnership to gain alignment, build consistency, common messaging, opportunities to challenge, and build trust.

Cascade similar forums at the energy center and operating centers.

- Communicate consistent messages regarding safety values and expectations
- Engage all co-workers in safety related initiatives such as the development and implementation of new programs and education.
- Encourage and mentor safety leaders, both formal and informal.

Incentive, Rewards and Recognition

Establish a consistent Ameren-wide incentive model tied to corporate, function and departmental performance and safe behaviors.

- All scorecards should include at least one common safety KPI that tracks incidents.

- Incorporate a safety metric into officer incentive compensation.
- Communicate the status of safety metrics regularly and visibly.
- Develop and implement a system to assimilate and track safety metrics

Corporate Safety Organization

Establish a Corporate Safety Organization with clearly understood roles and responsibilities to enable consistent development and execution of safety strategies, programs, communication and be a valued resource to the business segments.

- Build a Corporate Safety Organization to serve as a resource to the business segments covering the key areas of Support Services, Safety Performance and Culture, and to be a liaison/consultant to business segment safety professionals.
- Name a vice president to lead the Corporate Safety Organization and serve as chairman of the Corporate Safety Leadership Council (CSLC) of segment operations vice presidents.
- Re-engage the CSLC as a key safety program implementer and leader.
- In collaboration with the business segments, design and implement a consistent safety organization model within the business segments.
- Provide on-going technical support to the business segments.
- Drive sustainable change in the way co-workers perform their work and the way they think.

Ameren Safety Strategy Implementation Actions

Critical Safety Processes

- A new Job Briefing process was designed and implemented which requires 4 levels of briefing at various stages of the performance of the work.
- A new Job Observation process was designed and is presently being implemented for both management and bargaining unit job observations and critiques.
- A new Incident Investigation process was designed and implemented for both apparent cause and root cause analysis. Root cause analysis for all serious injuries is conducted by a cross-segment team of safety leaders to ensure peer review and sharing of lessons learned.

Communication and Symbols

- A new Ameren safety brand was designed and implemented to reflect Ameren's unwavering **Focus on Safety**.
- A new Ameren Safety Vision was established with a strong focus on accountability. "Unsafe acts are neither committed nor accepted; every employee is expected to challenge any unsafe act and complete each workday safely."
- 2,400 Safety Vision Posters, with the new safety brand, and facsimile signatures of senior leaders were printed, framed and placed in every Ameren work location.
- Safety messaging is the 1st order of business in all co-worker meetings including officer meetings.
- An Ameren SharePoint site was created to provide a focal point for timely safety data and information to promote consistent messaging.
- An Ameren enterprise safety management system, branded Safety1Source, is in the development phase. When fully implemented, the system will provide a central resource for data capture, reporting, trending, anonymous near miss reporting, and mobility.
- Talking points for all officers and cascading throughout Ameren that describe the importance of safety such as: Safety is the Bluest of the Blue Chips; Safety is the First Aspect of Operational Excellence; No Job is Performed Well if it is not Performed Safely; Safety is a Blue Chip Not a Bargaining Chip; If You Can't Work Safe You Can't Work Here; Safe Vision – More Than Words on the Wall.

Education and Culture

- The "Effective Job Planning and Error Prevention" curriculum was developed, approved by the Corporate Safety Leadership Council (CSLC) of Ameren officers, and 5,000 physical workers and management personnel were educated over 4 months on not only

the new Job Briefing process itself but also why Ameren was improving the process. The urgency was driven through officer sponsorship. The curriculum is offered quarterly to ensure education of new hires.

- The "Co-worker to Co-worker (c2c) curriculum was developed, approved by the Corporate Safety Leadership Council (CSLC) comprised of Ameren Officers and Ameren is in the process of educating all operational co-workers, both management and bargaining unit, on communication skills associated with challenging with respect and appreciation on the part of the receiver.
- Apparent Cause education was provided to over 400 management and bargaining safety co-workers and Root Cause education was provided to over 40 management co-workers.

Bargaining Unit / Management Safety Leadership Alignment

- "Leadership for a Safe Ameren" forums were launched with attendance by all Ameren operating officers and senior leaders as well as all bargaining unit business managers and representatives. These forums continue and provide an environment for information sharing, challenge, discussion and learning.
- "Leadership for a Safe Ameren" sub-teams were launched to address such matters as co-worker safety accountability, roles and responsibilities, and peer-review in support of issue resolution.
- Modifications were made in the Ameren technology system to afford bargaining unit manager access to safety information.
- Multiple safety-focused teams are formed across Ameren to share information, promote education roll-out and application, and drive areas of continuous safety improvement.
- New Employee Orientation (NEO) meetings now include a segment corresponding specifically to safety and the presentation to new hires is co-led by an Ameren officer and Bargaining Unit manager.
- A Missouri Bargaining Unit manager was featured in the Ameren Journal publication to offer a labor perspective on safety.

Incentive, Rewards and Recognition

- All performance scorecards contain at least one safety metric KPI tied to safety incidents. Ameren Missouri scorecards track both LWAs and Recordables.
- The officer incentive compensation (EIP-O) ties 10% of total officer compensation to Lost Workday Away (LWA) performance. LWAs reflect the more serious and therefore more costly injuries and the EIP-O target performance of 21 LWAs and fatalities across all Ameren reflects the best ever Ameren performance.

Corporate Safety Organization

- A center-led Corporate Safety organization was established to provide technical business support to the Ameren business segments, implement the new safety strategy, and be a resource on matters pertaining to on-going safety strategy development and OSHA compliance. With the support and engagement of the officer group, the Corporate Safety organization includes safety, culture/change management, communication, instructional design, training, and information technology professionals.
- A vice president of Safety was named with responsibility for leading the new strategy implementation and chairing the Corporate Safety Leadership Council (CSLC) of operating officers.
- The Corporate Safety Leadership Council was re-organized and refocused toward consistent and effective strategy implementation, peer-to-peer discussion and challenge, shared learning, and continuous improvement in safety.

**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)
Increase Its Revenues for Electric Service.)
Case No. ER-2014-0258

AFFIDAVIT OF DENNIS W. WEISENBORN

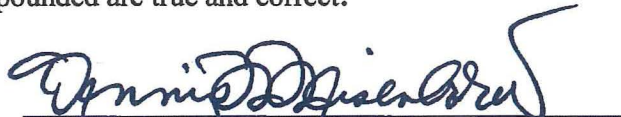
STATE OF MISSOURI)
)**ss**
CITY OF ST. LOUIS)

Dennis W. Weisenborn, being first duly sworn on his oath, states:


1. My name is Dennis W. Weisenborn. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services as Vice President Safety & Supply Services.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Union Electric Company d/b/a Ameren Missouri consisting of 14 pages, and Schedule(s) DWW-R1 TO DWW-R2, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.


Dennis W. Weisenborn

Subscribed and sworn to before me this 12th day of January, 2015.


Notary Public

My commission expires:

Julie Irby - Notary Public
Notary Seal, State of
Missouri - St. Louis County
Commission #13753418
My Commission Expires 1/15/2017