

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation of Union Electric)	
Company d/b/a AmerenUE's Storm Restoration Efforts in)	<u>Case No. EO-2007-0037</u>
the St. Louis Area)	

CONCURRING OPINION OF COMMISSIONERS ROBERT M. CLAYTON III AND
STEVE GAW

We concur in the Order opening an investigation into the devastating impact of a natural disaster that occurred on July 19, 2006, in the St. Louis Metropolitan area. Media reports have highlighted the power outages, water shortages and communication difficulties stemming from severe thunderstorms, high winds and other severe weather conditions. As of today, eight days have passed since the storm and 36,500 AmerenUE customers continue to suffer without modern day necessities. Hundreds of thousands of citizens have gone without electricity, air-conditioning, refrigeration, televisions, internet and cooking equipment. Losing electricity poses life-threatening conditions to many people, especially those who are dependant on medical equipment. Nine people have died in the aftermath of the storm and extreme heat.

Commission personnel have been involved in emergency response to a limited extent by helping coordinate resources and observing utility response to the disaster. It is critically important that this Commission assess the strength and durability of each of the utility systems in place, critically analyzing the impact of the storm and the quality of utility responses.

As the Commission begins this assessment, it is important to note several items. First, this

investigation should not interfere with any ongoing efforts to restore service to customers. The first priority is to restore safe and adequate service before making detailed inquiries. Second, there is no question that the St. Louis Metropolitan area suffered from a horrific storm with 80 mph winds, strong gusting rains and damaging hail. No level of preparation or governmental direction can completely prevent power outages. Third, there is no question that utility personnel have worked tirelessly and at great sacrifice to restore the necessities of modern day life. An AmerenUE employee has made the ultimate sacrifice in doing his job.

In light of these three observations, this Commission must examine where, why and how things went wrong. According to reports, communication between utilities and their customers appear to have been far from adequate. Service outages were not reported efficiently and internet notification failed. 36,500 customers in the affected region continue to demand relief from stifling heat due to lack of electricity. Other utilities experienced difficulties as well. Missouri-American Water instituted a boil order during the first day when many customers lacked electricity to boil water. Disputes arose between Ameren and AT&T on communications disruptions.

Staff has supplied a general list of items to be assessed, analyzed and critiqued. This Commission must play a leading role in finding the weak points in the infrastructure and be aggressive in addressing how we can best prepare for future Missouri weather disasters. We would add to Staff's list the following:

- 1) Analysis of the age, siting, durability and quality of Ameren's infrastructure, including the placement of distribution lines;
- 2) A comprehensive compliance review of Commission Orders stemming from prior storms and outages;

- 3) An analysis of all assistance requested or offered and whether Ameren accepted or denied the offers of assistance by other entities;
- 4) An evaluation of the communication, cooperation and assistance between the affected utilities, citizens and city, county and state officials;
- 5) An analysis of why the St. Louis Metropolitan area has suffered through three straight summers of significant power outages when no other U.S. city has faced the same challenges;
- 6) An assessment of the coordination of the efforts to ensure that critical operations facilities such as hospitals, residential care facilities, police and fire department buildings had temporary electric needs satisfied until service from the grid could be restored;
- 7) An assessment of the interdependence among all Missouri certificated utilities in the affected area; and
- 8) Any and all recommendations to improve utility response.

This investigation should be prompt but thoroughly conducted to ensure an accurate, timely response for improving utility performance. The information obtained should remain public so all customers and rate payers affected by the outages can monitor the damage and response.

Respectfully submitted,



Robert M. Clayton III
Commissioner



Steve Gaw
Commissioner

Dated at Jefferson City, Missouri,
on this 27th day of July, 2006.

Review of AmerenUE Storm Restoration Effort (Outline)

Storms / Arrival Times / Outages by Day - Morning & Evening (w/maps)

Crew Needs Determination

- Mutual Assistance Agreements

- Search for Outside Crews

- When Crews Called In

- Any Delays in Crew Availability/Arrivals

- How Long Crews Were Kept

Outage Tracking & Field Dispatch Coordination

Prioritization of Outage Repairs

- Priority Treatment Groups (fire, medical, police, water, sewer, etc...)

- Prioritization of Remaining Customers

Call Center Operations During Storm

- Customers Calling In To Report Outages (Telco Problems?)

- Overflow Provisions

- Automated Call Back Functions

- "You should receive service by X O'Clock"

- "You should have service on in your area at this time"

Internet Linkage Problems Early On

Consumer Services Specific Issues/Observations

Medical Needs Customer Registration and Notifications

Contact w/City Officials & Agencies

Vegetation Management

- Status of Trimming, Still on Track?

- Any Need to Accelerate Trim Schedule?

- Any Need to Consider Additional Programs?

- Any Special Contracts/Initiatives

- Years for Transmission vs. Distribution

- Service Lines in Yards

- Types of Trees & Clearance Distances

- Replacement of Problem Trees / Incentives (Ornamentals)

Grid Reliability Standards Issues & Infrastructure Maintenance

Evaluation of Restoration Effort & Recommendations