

Exhibit No.:  
Issues: Right of Way  
Maintenance Practices  
for Transmission Line  
Witness: Thomas Beerman  
Type of Exhibit: Direct Testimony  
Sponsoring Party: AmerenUE  
Case No.: EO-2002-351  
Date Testimony Prepared: July 10, 2002

**FILED<sup>2</sup>**

**JUL 11 2002**

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. EO-2002-351**

**Missouri Public  
Service Commission**

**DIRECT TESTIMONY**

**OF**

**THOMAS BEERMAN**

**St. Louis, Missouri  
July 11, 2002**

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

Application of Union Electric Company     )  
for Permission and Authority to Construct,     )  
Operate, Own and Maintain a 345 kilovolt     )     Case No. EO-2002-351  
Transmission Line in Maries, Osage and     )  
Pulaski Counties, Missouri     )  
("Callaway-Franks Line")     )

**AFFIDAVIT OF THOMAS G. BEERMAN**

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

Thomas G. Beerman, being first duly sworn on his oath, states:

1. My name is Thomas G. Beerman. I work in St. Louis, Missouri and I am employed by Ameren Services Company as Superintendent Vegetation Management of the Forestry Group.

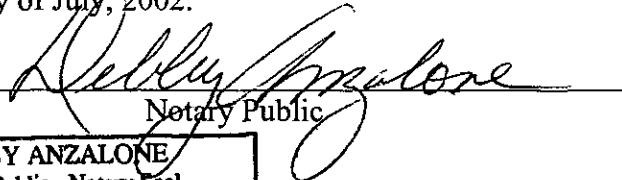
2. Attached hereto and made a part hereof for all purposes is my Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of 7 pages, which has been prepared in written form for introduction into evidence in the above-referenced docket.

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

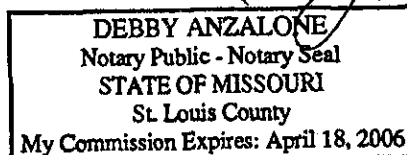


Thomas G. Beerman

Subscribed and sworn to before me this 3 day of July, 2002.

  
Notary Public

My commission expires:



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2 OF  
3 THOMAS BEERMAN  
4 Ameren Services  
5 CASE NO. EO-2002-351

6 I. INTRODUCTION

7 Q. Please state your name and address.

8 A. Thomas Beerman, 1901 Chouteau Avenue, P.O. Box 66149,  
9 St. Louis, Missouri, 63166-6149.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by Ameren Services Company (Ameren  
12 Services) as Superintendent of Vegetation Management. Ameren  
13 Services performs various technical and administrative services  
14 to Union Electric Company, doing business as AmerenUE, and to  
15 other subsidiaries of Ameren Corporation (Ameren).

16 Q. What are your responsibilities in that position?

17 A. My responsibilities include the administration of  
18 AmerenUE's contracts for tree trimming and its vegetation  
19 management practices to ensure the safe and reliable operation of  
20 AmerenUE's electrical transmission and distribution systems. I  
21 supervise a staff of 9 AmerenUE forestry supervisors. I am also  
22 responsible for budgeting, planning, and forecasting vegetation  
23 management maintenance work.

1           Q.     How long have you been employed by Union Electric  
2     Company?

3           A.     I have been employed full time at Union Electric  
4     Company since November of 1983. I worked for approximately 3  
5     years at AmerenUE's Callaway nuclear power plant. The jobs I  
6     held at Callaway included Assistant Equipment Operator and  
7     Radchem Helper. I transferred to the Forestry Department in  
8     April of 1986 where I worked as a Landscape Gardener until July  
9     of 1987. In July 1987 I was promoted to Forestry Supervisor. In  
10    November of 2001, I was promoted to Superintendent of the  
11    Vegetation Management Department for Ameren Services.

12          Q.     What is your educational background?

13          A.     I graduated with a Bachelor of Science degree in  
14    Forestry from the University of Missouri at Columbia in August of  
15    1982. I have been a Certified Arborist since June of 1999.

16          Q.     What is the purpose of your testimony?

17          A.     I will discuss AmerenUE's right of way maintenance  
18    practices to provide information to the Commission and to the  
19    affected property owners as to how AmerenUE would maintain the  
20    right of way applicable to the proposed Callaway-Franks line.

21    **II. AMERENUE'S TRANSMISSION RIGHT OF WAY MAINTENANCE PRACTICES**

22          Q.     Please discuss the Company's practices for maintaining  
23    its transmission right of way.

24          A.     AmerenUE's primary goal in managing vegetation within  
25    its rights of way is to provide safe and reliable electrical  
26    service while maintaining, and where possible improving,  
27    desirable wildlife habitat. We will upon the initial start up of

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1 a vegetation management program discuss long term plans with  
2 individual property owners for managing the right of way on their  
3 property.

4 Ameren takes a zoned approach to vegetation management  
5 on transmission rights of way. We basically divide the right of  
6 way into 2 zones. The first zone is called the wire zone and  
7 consists of the area occupied by the conductors and poles/towers  
8 on the right of way. This zone will vary in size depending upon  
9 the type of construction found on the right of way. Typically  
10 the "wire zone" consists of the area from the center of the  
11 structure to 20 feet beyond the outside conductors. Our  
12 vegetation management practices in this zone are designed to  
13 encourage lower growing species of plants with a mature height of  
14 less than 10 feet. The 2<sup>nd</sup> zone is called the "border zone" and  
15 is defined as the area from the edge of the wire zone to the  
16 existing mature tree line or the outside edge of the right of  
17 way. The border zone is managed to promote plant species with a  
18 mature height of less than 25 feet.

19 AmerenUE uses a combination of mechanical, natural and  
20 herbicide treatments to control certain plant species within each  
21 zone. As discussed below, we only use herbicide when permitted  
22 to do so by a property owner.

23 Contractors do the majority of vegetation management work on  
24 AmerenUE's rights of way. We take numerous steps to ensure that  
25 they 1) are accountable to AmerenUE and to the property owners,  
26 2) follow proper practices, and 3) are respectful of the property  
27 owners' rights. Contractors working for AmerenUE are required to

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1 have all necessary state and federal licenses to do the work that  
2 is assigned to them. AmerenUE also requires all contractors to  
3 have a minimum of \$1 million in liability insurance. Further,  
4 AmerenUE requires all contractors to respond to property owner  
5 damage claims within 24 hours of receipt of a damage claim. All  
6 vegetation management contractors working for AmerenUE are  
7 required by contract to employ general foremen that are certified  
8 arborists. The certification must be obtained through the  
9 International Society of Arboriculture (ISA).

10 AmerenUE audits the contractor performance monthly and  
11 evaluates them on the quality of their work, production and safe  
12 work practices. We require all contractors to make courtesy  
13 contacts of property owners prior to doing work on their  
14 property. In instances where herbicides are to be applied,  
15 contractors are required to obtain signed permission slips from  
16 the property owners prior to applying herbicides. If a property  
17 owner does not want us to use herbicide, we do not do so.  
18 Contractors are required by law to apply herbicides as directed  
19 on the herbicide label. All herbicides used by contractors must  
20 be approved by the Environmental Protection Agency. AmerenUE  
21 requires all contractors to perform work in such a manner as to  
22 not promote erosion within the right of way. Examples of such  
23 practices includes leaving desirable vegetation along stream  
24 banks, culverts and road crossings. Contractors are instructed  
25 not to do routine maintenance work during wet weather conditions.  
26 This is done to reduce the possibility of ruts being formed  
27 within the right of way. Contractors are instructed to follow

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1 existing access roads when going to and from work locations  
2 within the right of way, and to ensure that gates are securely  
3 closed.

4 Q. Does the Vegetation Management group at AmerenUE have  
5 responsibility for the initial clearing of the right of way when  
6 a new line is built?

7 A. No. Another department at AmerenUE performs the  
8 initial clearing. This will be addressed in Mr. DeWeese's direct  
9 testimony.

10 Q. What assurances can you give that AmerenUE would  
11 properly maintain the right of way for the proposed Callaway-  
12 Franks line?

13 A. To ensure that the steps discussed above are  
14 consistently followed, AmerenUE employs a staff of Forestry  
15 supervisors who audit the contractors' work, patrol the rights of  
16 way annually, handle property owner inquiries and plan the work  
17 that is to be done. All of AmerenUE's forestry supervisors are  
18 certified in the field of arboriculture by the ISA.

19 The audit procedures in place are used to evaluate the  
20 contractor performance of vegetation management work done on  
21 AmerenUE rights of way. If poor performance is recorded on the  
22 audits there are penalties imposed on the contractor. Typically  
23 the penalty is correction of work to proper standards at no  
24 additional cost to AmerenUE and can lead to the termination of  
25 some or all of that contractor's work for AmerenUE. This ensures  
26 that the contractors have the right economic incentives to do the  
27 job properly in accordance with the Company's practices as



1 discussed above. The audit evaluates a contractor's performance  
2 in such areas as site cleanup, proper trim techniques, proper  
3 brush disposal, proper herbicide application, adequate conductor  
4 clearance, preservation of desirable vegetation and stump height  
5 left after tree removal or brush clearing, production and  
6 accurate recording of work location and units of work done at the  
7 location.

8 If the Callaway-Franks line is built, AmerenUE  
9 forestry supervisors would meet with individual property owners  
10 and discuss vegetation management options on their properties.  
11 These discussions would take into account the terrain involved  
12 (for example, pasture, field, woods, flat, sloped, waterways,  
13 etc.). The discussions would include such items as brush  
14 disposal options, participation in "Project Habitat", and the  
15 overall long-term vegetation management plan to be used on a  
16 given property. The property owners could choose among these  
17 options for maintaining the right of way on their property.  
18 There might be other options which would be agreeable to both the  
19 Company and a particular owner.

20 **III. CONCLUSION**

21 **Q. Please summarize your testimony.**

22 **A.** AmerenUE's right of way maintenance practices are  
23 designed to provide safe and reliable electric service to the  
24 public, while at the same time showing respect for affected  
25 property owners and the environment.

26 We maintain this right of way through a skilled set of  
27 employees with experience and knowledge in vegetation management

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1 practices. AmerenUE imposes strict performance requirements on  
2 contractors retained to perform right of way maintenance. The  
3 Company monitors and audits these contractors carefully to ensure  
4 that they are performing consistent with their contracts with the  
5 Company.

6 If the proposed Callaway-Franks line is built,  
7 AmerenUE would be willing to meet with individual property owners  
8 affected by the proposed line to discuss with them the various  
9 options which are available to maintain the right of way.

10 Q. Does this conclude your testimony?

11 A. Yes, it does.  
12  
13