

SUBPOENA DUCES
Order to Appear for Deposition



FILED³

DEC 27 2006

Missouri Public
Service Commission

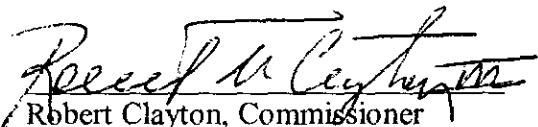
THE STATE OF MISSOURI

To: Rickey A Weirich
LCTT Representative, IBEW
2131 59th Street
St. Louis, MO 63110

You are hereby commanded to appear before The Public Service Commission of the State of Missouri at 9:00 a.m. on December 27, 2006, at the Governor Office Building, Room 310, 200 Madison St., Jefferson City, Missouri.

Given under my hand, this 20th day of December, 2006,


Steve Law, Commissioner
Public Service Commission


Robert Clayton, Commissioner
Public Service Commission

RETURN

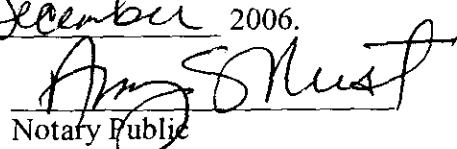
I HEREBY CERTIFY that I served this subpoena by:

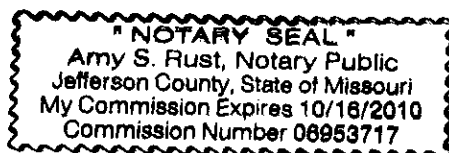
- (☒) delivering a copy to the person named above.
() reading a copy to the person named above.

at 12:00 pm (time) on the 21st day of December 2006, at the following location: 2131 59th Street, in the State of Missouri.

Amy R. Mage Regulatory Auditor II
[Name] [Title]

Subscribed and sworn to before me this 21st day of December 2006.


Notary Public



LOCAL UNION NO. TWO

INTERNATIONAL BROTHERHOOD



OF ELECTRICAL WORKERS

MAIN OFFICE:
2131 59TH STREET
ST. LOUIS, MO 63110
(314) 645-2236
FAX (314) 645-2228

AFFILIATED WITH AFL-CIO-CLC



BRANCH OFFICE:
209 FLORA DRIVE
JEFFERSON CITY, MO 65101
(573) 635-3311
FAX (573) 635-1486

December 19, 2006

Mr. Steve Gaw
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102-0360

re: Tree Trimming on Ameren UE property in Missouri

Dear Commissioner Gaw:

I am writing to you to express my concerns regarding Ameren UE and their line clearance/ tree trimming policies. I am currently the Line Clearance/Tree Trimming representative of IBEW Local #2, but have also worked in the field as a Journeyman Trimmer for many years. Because of my experience in this trade, I feel that I have useful information with regard to Ameren UE's line clearance/tree trimming policies.

My main concern is with Ameren UE's tree trimming policy. Comments have been made in the media about trimmers performing substandard work. As a tree trimmer, I disagree with those comments wholeheartedly. The tree trimmers are performing the work requested of them, but are not able to do more to prevent problems because of Ameren UE's policies. During my time in the field, I experienced constant changes in tree trimming depending on which type of circuit you were working on at the time. All policy information was passed on verbally - we were never provided with a written copy of what standards were expected.

In 1992, I participated in a job planning program with Ameren UE. Ameren implemented the program in order to prevent future problems. As a job planner, it was my responsibility to contact homeowners to get permission to remove problem trees, look for trees located in utility easements, and look for trees in the power lines. However, I was told in 1995 that the program would be discontinued because it took too much time and was too expensive to continue. Although we would have still had damage after the storms, if the job planning program had been kept in place, the damage that occurred could have been reduced. I feel that the quality and reliability of today's standards are poor.

-continued-

Commissioner Steve Gaw
December 19, 2006
Page 2

Approximately three to four years ago, Ameren UE started requiring the contractors to complete a certain number of "line miles" within a period of time. In my opinion, this is the poorest way to attain reliability in the job that is being performed because it encourages quantity rather than quality work. It is my understanding that if line mile quotas are not met, the contractors will be penalized either financially or by loss of man power.

When the St Louis area was hit by storms in July and again in November, Ameren UE did a good job of having an adequate number of men in the area to complete the work. I do recall that they kept a lot of extra crews working after the storm restoration until October 2006.

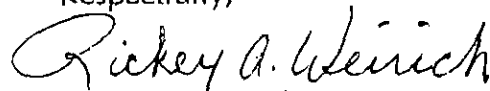
However, on November 13, 2006, Ameren shut the system down. To the best of my knowledge, the shut down was due to a shortage in their budget. At the end of the week, on November 17, 2006, eighteen (18) crews were laid off.

While talking with a number of IBEW Local 2 members, during the November 30, 2006, ice storm, I asked about uprooted trees. It is my understanding that only a small number of trees were uprooted, with the majority of the damage caused by downed tree limbs.

I am writing to you today because our tree trimmers are getting a bad rap through this whole incident. Our members are good trimmers who have been in the trade a long time. Rather than bringing out of state crews to Missouri as an emergency reaction to the storms, the whole situation could have been avoided if Ameren had been proactive by keeping more people working throughout the year. I think Ameren UE needs to shoulder more of the responsibility for their tree trimming policies.

Thank you for your time and attention to this matter. I look forward to talking further with you.

Respectfully,



Rickey A Weirich
LCTT Representative

RAW/asr
OPEIU #13

cc: Jeff Davis, Chairman
Connie Murray
Robert Clayton III
Linword "Lin" Appling