

## Memorandum

TO: Missouri Public Service Commission Official Case File  
Case No. EO-2009-0011, Compliance Plan concerning 4 CSR 240-23.020  
Infrastructure Inspection Standards

FROM: Dan Beck, Energy Department – Engineering Analysis

/s/ Lena Mantle 1/21/09  
Energy Department / Date

/s/ Sarah Kliethermes 1/21/09  
General Counsel's Office / Date

Subject: Staff Report

Date: January 21, 2009

On July 2, 2008 Union Electric Company d/b/a AmerenUE (AmerenUE or Company) made a filing in EFIS that included a twelve (12) page document titled "AmerenUE 4 CSR 240-23.020 Electrical Corporation Infrastructure Compliance Plan" (Compliance Plan), verification by Ron C. Zdellar, and fifteen (15) appendices that outline the inspection cycles for various components of the transmission and distribution system. These fifteen (15) appendices make up another 179 pages of the filing. The Compliance Plan stated that AmerenUE's manholes and vaults were being uniquely identified and that AmerenUE would develop an inspection schedule for 2009 when the identification progress was complete.

On December 23, 2008, AmerenUE made a filing that included a two (2) page document titled "AmerenUE 4 CSR 240-23.020 Electrical Corporation Infrastructure Compliance Plan - Supplement" and four (4) appendices that outline the inspection cycles for the distribution system manholes and vaults. These four (4) appendices make up another 155 pages of the filing.

The Staff developed the attached table that summarizes the nineteen (19) appendices, including the number of items listed and the percent of inspections that were scheduled by AmerenUE for the years 2008 and 2009.

The Staff of the Missouri Public Service Commission (Staff) has reviewed the Compliance Plan and the Supplemental filing. The Staff verifies that the Company's filings are in compliance with 4 CSR 240-23.020(3)(B).

**Staff's Summary of AmerenUE Infrastructure Inspection Appendices**  
**Case No. EO-2009-0011**

| Appendix | Year     | Title  | Pages | Items Listed | Percent of Total |
|----------|----------|--|-------|--------------|------------------|
| A        | 2008     | Transmission System Ground Line Inspection   | 1     | 5            | 6%               |
| B        | 2009     | Transmission System Detailed Line Inspection                                       | 1     | 7            | 9%               |
| C        | 2009     | Transmission System Ground Line Inspection   | 1     | 8            | 9%               |
| D        | Outyears | Transmission System Detailed Line Inspection                                       | 2     | 67           |                  |
| E        | Outyears | Transmission System Ground Line Inspection   | 2     | 74           |                  |
| F        | 2008     | Distribution System Visual Circuit Inspection Schedule                             | 10    | 455          | 15%              |
| G        | 2008     | Distribution System Ground Line Inspection Schedule                                | 5     | 213          | 8%               |
| H        | 2009     | Distribution System Visual Circuit Inspection Schedule                             | 18    | 844          | 29%              |
| I        | 2009     | Distribution System Ground Line Inspection Schedule                                | 6     | 272          | 10%              |
| J        | 2009     | Distribution System Underground Pad-mounted Equipment Patrol Inspection Schedule   | 11    | 526          | 37%              |
| K        | 2009     | Distribution System Underground Pad-mounted Equipment Detailed Inspection Schedule | 7     | 320          | 29%              |
| L        | Outyears | Distribution System Visual Circuit Inspection Schedule                             | 34    | 1650         |                  |
| M        | Outyears | Distribution System Ground Line Inspection Schedule                                | 46    | 2227         |                  |
| N        | Outyears | Distribution System Underground Pad-mounted Equipment Patrol Inspection Schedule   | 19    | 914          |                  |
| O        | Outyears | Distribution System Underground Pad-mounted Equipment Detailed Inspection Schedule | 16    | 778          |                  |
| P        | 2009     | Distribution System Manhole Inspection Schedule                                    | 37    | 1773         | 25%              |
| Q        | 2009     | Distribution System Vault Inspection Schedule                                      | 3     | 124          | 25%              |
| R        | Outyears | Distribution System Manhole Inspection Schedule                                    | 107   | 5223         |                  |
| S        | Outyears | Distribution System Vault Inspection Schedule                                      | 8     | 373          |                  |

|                     |     |      |
|---------------------|-----|------|
| Original Filing     | 179 | 8360 |
| Supplemental Filing | 155 | 7493 |

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

In The Matter of Union Electric Company )  
d/b/a AmerenUE Filing of a Compliance )  
Plan Concerning Infrastructure Standards )  
Pursuant to Missouri Public Service )  
Commission Rule 4 CSR 240-23.020 )

Case No. EO-2009-0011

**AFFIDAVIT OF DANIEL I. BECK**

STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

Daniel I. Beck, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Daniel I. Beck

Subscribed and sworn to before me this 21<sup>st</sup> day of January, 2009.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #00842086

  
Notary Public