

AMERENUE AND AMERENCIPS  
VEGETATION MANAGEMENT PROGRAM  
POLICY AND PRACTICES

AmerenUE and AmerenCIPS

## Vegetation Management Program Policy and Practices

The AmerenUE and AmerenCIPS Vegetation Management Program is predicated on minimizing tree-caused outages and thereby enhance reliable service to our customers and promote public safety. The actual tree trimming process is based on the concept of providing adequate clearance with minimum reduction in tree values.

Physical and environmental conditions are constantly changing. As these factors change they must be reflected by similar changes in the Vegetation Management Program to keep it constantly progressing. Since many factors influence such a program, it must be flexible and requires considerable judgement in its application.

### Vegetation Management Policy

#### General

Tree trimming is done according to the natural pruning technique recommended by the International Society of Arboriculture. Since this method utilizes existing knowledge of natural physiological responses of trimmed trees, it provides several important benefits: (1) leaves a more natural appearance to the trees or limbs pruned and (2) reduces the number and vigor of sucker sprouts which maximizes the effectiveness of the trimming process while removing a minimum amount of foliage from the tree.

Except in the case of emergency, all vegetation management operations are done on a routine basis utilizing systematic crew scheduling to obtain maximum production for money spent. Feeder maps are used for crew assignments and accumulating pertinent statistical data.

In determining how much and the type of trimming that will be done, it is presumed that the Companies' facilities are built only after the necessary permits, approvals, or easements have been obtained and therefore, are legally occupying the location.

All trimming, whether construction or maintenance, is intended to provide clearance of acceptable industry standards in both urban and rural areas.

Trees located directly under primary lines, requiring repeated trimming, should be removed if the cost of removal does not exceed that necessary to accomplish two trimming operations. In most instances trees should not be removed without the signed permission of the property owner.

Trees or limbs removed in the process of restoring service after a storm are left for the customer's disposal; however, considerable discretion should be used in how and where the brush is left. Streets, alleys, sidewalks, etc. are not to be blocked. If possible,

brush is to be placed on the owner's property; otherwise, it should be left where tree or limb would have fallen if the line had not been there.

On routine trimming where dead trees are encountered that in falling will hit a primary line, the trees should be cut down or the portion likely to hit the line removed, whichever requires the least time. If at all possible, written consent should be obtained and the brush and logs left for the customer's disposal; otherwise, the debris should be removed.

Written consent should be obtained from governmental authorities where required by law and signed permits obtained from property owners before proceeding with any trimming or removal to clear for new line construction.

When trimming trees for routine maintenance work or conducting other non-emergency vegetation management within AmerenUE or AmerenCIPS territories in Illinois, 21 days written notice must be given to affected municipalities and 7 days to affected customers in accordance with State of Illinois, Public Act 91-0902.

When trimming trees for routine maintenance work in Missouri, signed or verbal permits are not required; but in the interest of public goodwill, a reasonable effort should be made to notify the property owner or residents that trimming is to be performed.

If a tree house, swing, climbing steps, etc., are observed within a tree that if used will bring a person into contact with an energized line, the property owner should be promptly notified to remove the tree house, etc. using trained personnel. If the tree crew obtains permission from the owner, the tree crew should remove the tree house, etc. If a property owner refuses to cooperate, legal remedies should be pursued.

Where it is evident that children are using a tree for climbing, the tree should be examined for its proximity to energized lines, and be either trimmed or removed to prevent contact with energized wires.

Where appropriate, unwanted tree growth should be controlled by using the appropriate herbicide and application method. Herbicides, even if applied by a contractor, must be approved by the Ameren Services' Environmental, Safety and Health Department and the Manager of Forestry. Brush cutting by hand or other mechanical means is acceptable only when or where circumstances prohibit the use of herbicides.

### Public Relations

Personnel engaged in vegetation management work, supervisors, and tree crews, have frequent contact with individual customers. It is important that they make every effort to maintain good public relations. Occasionally this is rather difficult to do when

refusing a request to trim or remove a tree that is contrary to this policy. However, when the Companies' policy and the logic behind it is fully explained, it is usually accepted.

Poor quality tree trimming, incomplete cleanups, noisy or rude workmen and insufficient explanation or work to be done are the major items in adverse public relations. It is necessary that supervisory personnel keep these factors under control.

When an agreement is reached with a customer to leave brush or logs on the premises, it does not include the right to leave the job site strewn with branches. Brush should be removed from roofs, driveways, sidewalks, etc., unless a prior agreement has been made that the customer will provide on-site assistance.

During routine trimming operations, brush should be moved off of sidewalks and driveways if there will be a time lapse of over fifteen minutes between trimming and brush cleanup. Limbs falling into the street should be moved immediately.

#### Customer Requests

If the tree work of others will interfere with the Companies' facilities, the Companies assume no responsibility for this work, but we will provide protection for our facilities and the general public.

All customer requests, except those which can definitely be ascertained to involve service drops only, are field inspected to determine the Companies' interest and responsibilities. Service drops may or may not be inspected depending on the circumstances described. If assistance in trimming or removal is required, the extent of such work is based on what can be done by an experienced, professional tree contractor.

When assistance is given that requires placing a portion of the tree on adjoining property, streets, alleys, driveways, etc., no work is done until the customer has an arborist on the job or otherwise demonstrates that he will carry out his portion of the work.

Except when dead trees are involved, every effort should be made to complete customer help jobs as part of the routine vegetation management work.

In any instance where help is provided to assist a customer, all wood and brush is left for the customer's disposal. A signed permit, so stating, is required before work commences.

The following guide is used in determining the extent and nature of the tree work to be done.

Service Drops - trees are not trimmed, removed, or topped for removal to clear service drops but the wires will be temporarily dropped by a troubleman so the customer

can remove or trim his tree. Troublemens may do limited amounts of limb removal based on customer requests.

Street Light and DD Circuits - same policy as service drops.

Secondaries- trees are not generally trimmed, removed or topped for removal except when a dead tree is involved and the tree/wire condition poses a hazard to wires or workmen. All other assistance is done on a routine basis when a crew is in the area. When possible, secondaries should be dropped if the cost is less than the tree work involved.

Primaries - if the tree in question does not interfere with our lines and can be trimmed or removed by others without damage to our lines, no work will be done.

If a tree which the customer wants to trim or remove interferes with our lines or has close overhang, the portion of the tree which overhangs the line will be removed, or line cover provided. A signed permit must be obtained by the crew before work begins.

Assistance in trimming or topping of a tree is generally done when a crew is in the area for maintenance or construction work.

#### General Practices

The amount and type of line clearance that the Companies will do depends on the voltage and importance of the line involved. Priority is given as follows: 345KV, 161KV, 138KV, 69KV, 34.5KV, 12.47KV, 4.16KV, 7.2KV, 2.4KV, secondaries, street light circuits and services.

1. 345, 161, 138KV - all of the transmission system is patrolled systematically and necessary work accomplished to keep it stormproofed, including the removal of obvious off right-of-way danger trees.

2. 69, 34.5KV - The subtransmission system is systematically patrolled, with special attention given to isolated circuits, and necessary work accomplished to keep it stormproofed. All obvious danger trees that can be removed are taken out or trimmed down below the line.

No overhang is allowed on these circuits.

3. 12.47, 4.16, 7.2 and 2.4KV - The distribution system of these voltage classifications are trimmed periodically.

The 3 phase 12.47 and 4.16 systems are generally stormproofed by removing overhanging branches and those growing close to the side of the lines. Exceptions are permissible in regard to high overhang from hardwood species such as oak, hickory, etc.

On the single phase 7.2 and 2.4 KV systems low overhanging branches (up to 15 feet) and dead limbs over or adjacent to the lines are removed. Trees under or adjacent to these lines should not be topped, through or side trimming is sufficient.

4. Secondaries - Secondaries are trimmed incidental to trimming on primary circuits. Any additional trimming necessary is done as the result of tree trouble reported.

5. Street Light System

a. Circuits - No routine trimming is done exclusively for street light circuits. A considerable portion of these circuits are trimmed incidental to trimming on primary circuits and any additional trimming necessary is done as the result of the tree trouble reported.

b. Luminaries - No routine trimming is done to remove limbs which interfere with distribution from street light luminaries, except as incidental to other trimming. Clearing trees for light distribution is considered the responsibility of the city or other governing body having jurisdiction over the trees and lights. In some Regional districts, however, because of different policy in the past or inclusion of tree trimming in the sales program, it may be necessary to do a limited amount of trimming for light distribution.

Tree trimming is done by the tree crew on initial installation of dusk to dawn lights, or if beyond their scope, by a tree trimming crew. On initial contact, customers should be informed that the billing rate does not include any future trimming.

Trimming for light distribution is not done for the City of St. Louis alley lights.

c. Service Drops - Tree trimming crews do a minimum amount of work on services and only in conjunction with clearing primary circuits. Special consideration may be given to commercial and three phase services.

\_\_\_\_\_  
John Bieller, Manager - Forestry

APPROVED:

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William J. Carr, Vice President, Customer Services - Regional

Union Electric Company d/b/a AmerenUE's Response to  
MPSC Staff Data Request  
MPSC Case No. EW-2004-0583

**SUPPLEMENTAL RESPONSE**

No. 0001:

Request From: Alan Bax

Please send all the documentation as discussed during a meeting concerning tree trimming/vegetation management policies conducted on Thursday, June 3, 2004 between PSC Staff and Ameren personnel Ray Wiesehan and Rick Schenck. This documentation should include, but should not be limited to, budget information from calendar year 2000 to the present, a copy of the required report being prepared for the FERC, specific information concerning vegetation management/tree trimming policies and procedures for both transmission and distribution lines, etc.

Supplemental Response No. 1:

Attachment 3 to the original response no longer needs to be designated as "Proprietary". See the attached document which has the "PROPRIETARY" designation removed.

Prepared By: Thomas M. Byrne  
Title: Associate General Counsel  
Date: November 5, 2004

Union Electric Company d/b/a AmerenUE's Response to  
MPSC Staff Data Request  
MPSC Case No. EW-2004-0583

**SUPPLEMENTAL RESPONSE**

No. 0005:

Request From: Alan Bax

In the Company response to Staff Data Request 1 in this case, there was mention of sixteen criteria utilized to audit the performance of contractors. Also, purportedly five criteria utilized to audit crew progress and safety. Please provide a comprehensive list of each of these criteria utilized in the audit process.

Supplemental Response No. 1:

See the attached Audit Form. This audit form is used by both contractor supervision and Ameren supervision to perform audits. The sixteen criteria are listed under Work Audit. The five criteria for safety are located under Crew Activity, which are typically filled out by contractor supervision.

**\*\*The attached form no longer needs to be designated as "PROPRIETARY".\*\***

Prepared By: Rick Schenk  
Title: Supt.of Vegetation  
Date: November 5, 2004



<b>AMEREN/UE AMEREN/CIPS FORESTRY JOB QUALITY AUDIT</b>		MONTH OF: _____	
		CONTRACTOR: _____	
CREW NUMBER/FOREMAN	CREW TYPE	DATE(S) AUDITED	
DISTRICT:	____ BUCKET ____ PP ____ ATAB ____ TIMBERLAND ____ MOWER ____ SPRAY ____ OTHER ____		
MAINTENANCE WORK ____ NEW CONSTRUCTION ____ OTHER ____		<b>WORK AUDIT</b>	SATISFACTORY   IMPROVEMENT NEEDED
PROPER CUTS TO BRANCH BARK RIDGE, NOT FLUSH OR STUBS			
CUT TO PROPER LATERALS, DIRECTIONAL PRUNING, FAVORING LARGER DIAMETER CUTS			
BARK RIPS, TEARS, EXCESS WOUNDING			
DANGER TREES/DEAD WOOD EFFECTIVELY CLEARED OR ELSE NOTED ON MAP AND TIMESHEET			
STUMP HEIGHT 3 OR LESS INCHES			
HANGERS/GENERAL CLEAN-UP			
HERBICIDE APPLICATION TECHNIQUE ACCEPTABLE & PROPER, NO SKIPS			
PRESERVATION OF DESIRABLE COVER CONSISTENT WITH SITE			
CLEARANCE ON TOP, SIDE, AND OVERHANG FOR VOLTAGE PRESENT			
IF REFUSAL NOTED ON TIME SHEET AND MAP			
SLASH DISPOSAL CONSISTENT WITH SITE			
TIMESHEET LEGIBLE WITH ACCURATE LOCATIONS FOR START/STOPS			
TIMESHEET ACCURATE ON WORK UNITS AND THE DIVISION OF TIME REPORTED			
MEN AND EQUIPMENT CONSISTENT WITH SITE			
PRODUCTION CONSISTENT WITH SITE			
REMOVALS CONSISTENT WITH SITE AND WITHIN GUIDELINES			
<b>GENERAL FOREMANS REVIEW</b>			
IF IMPROVEMENT NEEDED MARKED			
EXPLAIN ACTIONS TAKEN			
<b>CREW ACTIVITY</b>		<b>ON ARRIVAL</b>	
MAINTENANCE WORK ____		DATE:	TIME:
NEW CONSTRUCTION ____		F:	
OTHER ____		T:	
		B:	
PROPER WORK SITE SET-UP			
ALL EQUIPMENT TO SPECIFICATIONS AND SERVICEABLE (IE CHIP QUALITY, SAWS, ETC)			
HERBICIDE LABELS/MSDS AND CONTAINER STORAGE (DISPOSAL)			
PROJECT CIRCUIT MAP: MARKED AND CURRENT WITH NOTES AS NEEDED			
CREW ID'S/PERSONAL APPEARANCE			
<b>GENERAL FOREMANS REVIEW</b>			
IF IMPROVEMENT NEEDED MARKED			
EXPLAIN ACTIONS TAKEN			
FORESTRY SUPERVISOR _____ DATE REVIEWED _____			

Union Electric Company d/b/a AmerenUE's Response to  
MPSC Staff Data Request  
MPSC Case No. EW-2004-0583

**SUPPLEMENTAL RESPONSE**

No. 0006:

Request From: Alan Bax

In the Company response to Staff Data Request 1 in this case, there is a reference made in connection with the removal of vegetation that lies outside the easement boundaries. The information indicates that the Company attempts to contact the property owner in advance prior to trimming/removing vegetation that lies outside the easement, especially if it has been identified as "hazardous" by the Company. Also, there is mention of an agreement that is sought from a customer/property owner before customer requested work is begun. 1. Please define what constitutes "hazardous" in this evaluation and what define the bounds outside the easement that the Company typically desires to evaluate. 2. Please ascertain the differences in policy between transmission, sub-transmission and distribution easements in regards to the emphasis on gaining approval to remove hazardous vegetation outside an easement. 3. What actions are necessary if prior approval is not given to the Company on transmission, sub-transmission or distribution lines? Please provide a sample document of all agreements of this type that the Company utilizes in attempting to get approval, whether in advance of work or not, from the property owner/customer for trimming/removal of vegetation. Please provide a sample of the document mentioned that is used to inform the customer/property owner of their responsibility for the removal of any debris prior to the beginning of working a customer/property owner request.

Supplemental Response No. 1:

**\*\*The attached form no longer needs to be designated as "PROPRIETARY".\*\***

See the attached form. This form is used by both contractor supervision/crews and Ameren personnel. After discussion with customer, Ameren obtains a signed form permitting it to remove dead/dying/ hazard trees that Ameren desires to remove. Since Ameren does not own the trees, typically all wood and brush is left for the customer to dispose of. However, Ameren may elect to remove some or all of the wood and brush in certain situations--for example, trees located under the wires that need constant trimming. The Permission form allows the flexibility to address both situations.

Generally on routine trimming where dead trees are encountered that present a significant risk to a primary line, the trees will be cut down or the portion of the trees likely to hit the line will be removed, whichever requires the least time. There is no "set" distance beyond the easement at which such trees will be removed. Whether a particular tree would be removed or trimmed will depend on the importance of the line, the likelihood that the tree will hit the line, possible safety concerns, etc. On routine calls, where a customer wants to remove a dead/dying/hazard tree near Ameren facilities, the company is under an obligation to "make it safe" for a qualified tree service

to remove the tree. Typically the company will make arrangements to de-activate lines if possible, provide cover, and/or do a limited amount of tree work to allow a qualified private tree service to remove the homeowner's tree.

Generally, transmission and sub-transmission easements allows for off easement work deemed necessary. Distribution easements typically do not address off easement work deemed necessary. Ameren's experience has been that the vast majority of customers permit any work the company deems necessary, once an explanation is given to the customer. In the few cases where a customer refuses permission to allow Ameren to go "off easement" to perform needed work, a certified letter is sent to the customer explaining the safety and liability risks that result from not allowing needed work to be performed.

Prepared By: Rick Schenk  
Title: Supt.of Vegetation  
Date: November 5, 2004

CC  
SW

Date \_\_\_\_\_ No. \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_

City/State \_\_\_\_\_

Phone \_\_\_\_\_

I hereby grant permission to:

[ \_\_\_\_\_ ]

who is an independent contractor of AmerenUE.

TO: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

This work is to be done at no cost to me.

SIGNED: \_\_\_\_\_

Owner's Signature

Agent/Person in Charge

Obtained by: \_\_\_\_\_

Completed by: \_\_\_\_\_

Completed Date: \_\_\_\_\_