

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

In the Matter of Union Electric Company d/b/a)	<u>File No. EO-2011-0325</u>
Ameren Missouri's Annual Vegetation)	
Management Report Pursuant to 4 CSR 240-)	
23.030(6)(C).)	

**STAFF’S COMPLIANCE REVIEW OF
AMEREN MISSOURI’S 2011 VEGETATION MANAGEMENT REPORT**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its compliance review of Union Electric Company d/b/a Ameren Missouri’s 2011 Vegetation Management Report states:

1. Ameren Missouri filed its 2011 Vegetation Management Report on April 1, 2011, followed by its verification of the report on April 4, 2011.
2. As the Commission noted in its April 13, 2011 Notice Closing File No. EO-2010-0325, Commission Rule 4 CSR 240-23.030(6)(E) requires Staff to review Ameren Missouri’s report, identify any deficiencies, and file its analysis and recommendations.
3. In the attached Memorandum (Appendix A), Staff reports to the Commission Staff’s review of Ameren Missouri’s 2011 Vegetation Management Report, a deficiency Staff identified, and Staff’s recommendations.

WHEREFORE, Staff files its analysis and recommendations regarding Ameren Missouri’s 2011 Vegetation Management Report.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 9th day of August, 2011.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission File No. EO-2011-0325
Union Electric Company d/b/a Ameren Missouri's Annual Vegetation
Management Report

FROM: Noumvi G. Ghomsi, Energy Department – Engineering Analysis

<u>/s/ Daniel I. Beck 08/03/11</u> Energy Department / Date	<u>/s/ Nathan Williams 08/03/11</u> General Counsel's Office / Date
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SUBJECT: Staff Status Report

DATE: August 3, 2011

OVERVIEW

Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed its Annual Vegetation Management Report in File No. EO-2011-0325 on April 1, 2011. Ameren Missouri did not verify its report until April 4, 2011. Rule 4 CSR 240-23.030(6)(E) requires the Missouri Public Service Commission (Commission) Staff to review such reports for compliance with the requirements of 4 CSR 240-23.030, Electrical Corporation Vegetation Management Standards and Reporting Requirements.

Staff's review revealed that Ameren Missouri's report met all the requirements of 4 CSR 240-23.030, except that it did not include the copy of Ameren Missouri's standard procedures for the removal of trimmings or cut vegetation during storm outages required by 4 CSR 240-23.030(4).

MISSING INFORMATION

Rule 4 CSR 240-23.030(4)(F)2, The Technical Standards for Vegetation Management, requires each electrical corporation to "include a copy of its standard procedures regarding removal of trimmings or cut vegetation during outages caused by a storm in its annual vegetation management filing." Ameren Missouri did not file its standard procedures regarding removal of trimmings or cut vegetation during outages

caused by a storm in this annual vegetation management filing, but Ameren Missouri did reference that it had filed a copy of its general guidelines now found in Case No. EO-2009-0012. These general guidelines are titled, “AmerenUE Vegetation Management Program and Practices,” are approximately 35 pages long and include the following statement:

Trees or limbs cleared in the process of restoring service after a storm should be left for the customer’s disposal; however, care should be taken in how and where the brush is left. Streets, alleys, sidewalks, etc. should not be blocked. If practical, brush should 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.

Based on discussions with Ameren Missouri personnel, Staff understands the statement above is Ameren Missouri’s standard procedure for removal of trimmings or cut vegetation during storm outages. Staff recommends Ameren Missouri specifically identify its standard procedures regarding removal of trimmings or cut vegetation during outages caused by a storm in its future annual vegetation management filings.

STAFF’S REVIEW

Staff reviewed Ameren Missouri’s filing, determined areas of concern, and met with Ameren Missouri personnel on May 20, 2011, to discuss them with Ameren Missouri. Staff did not limit its review to compliance with the annual filing requirements, but also compliance with the other provisions of Rule 4 CSR 240-23.030.

As stated above, Staff identified that Ameren Missouri’s annual filing did not include a statement of Ameren Missouri’s policy regarding removal of trimmings or cut vegetation during outages caused by a storm or an explicit reference to such a policy.

In addition, Ameren Missouri did not show in its report that it posts its vegetation manager’s name and contact information on its website as required by General Provision section, 4 CSR 240-23.030(2)(D). Staff was able to identify contact information for the

vegetation management department, but could not verify the vegetation manager's name. Staff contacted Ameren Missouri regarding this information and Ameren Missouri sent to Staff a screen shot of its website where the manager's name is located. Staff visited the website and confirmed that Ameren Missouri provided the manager's name there. Therefore, Ameren Missouri has been and continues to be in compliance with the posting of the vegetation manager's name requirement.

Although Rule 4 CSR 240-23.030(6)(C) requires a summary of the information required by Rule CSR 240-23.030(6)(B) be included in the filed annual report, Ameren Missouri did not include the names of the crew supervisors. Rule CSR 240-23.030(6)(B) provides:

The electrical corporation shall monitor and document all scheduled vegetation management and related activities it or its contractors performs. Documentation shall include, but shall not be limited to:

1. Identification of each circuit and substation where vegetation management was performed;
2. The type of vegetation management performed including removal, trimming and spraying and methods used;
3. The crew size and supervisor's name;
4. The date of activity;
5. Any safety hazards encountered; and
6. Any unexpected occurrence or accident resulting in death, life-threatening or serious injury to a person assigned to perform vegetation management activities or the public.

In its report Ameren Missouri discussed the range of crew sizes, but did not include the supervisors' names. When Staff inquired of Ameren Missouri it responded that it had not included that information in the report as being too voluminous since its listing of supervisors changes almost daily. Staff and Ameren Missouri discussed this matter during a May 20, 2011 meeting where Ameren Missouri provided copies of one month of

documentation that exceeded the detail required by Rule 4 CSR 240-23.030(6)(B). Staff conducted a field audit to match specific documents with physical locations where the vegetation management took place. Staff agrees with Ameren Missouri that the summary of the supervisors' names required by the rule does not require providing a list that changes almost every day. Staff reviewed Ameren Missouri's 2010 documentation at the meeting May 20, 2011. Further, Ameren Missouri plans on saving its' 2011 and future vegetation management documents for Staff to review upon request.

MEETING OVERVIEW

In addition to discussing the matters addressed above, at the May 20, 2011 meeting, Ameren Missouri discussed its organizational structure. Ameren Missouri also gave Staff an overview of its maintenance schedule, expenditures, mid-cycle patrols, record keeping, and a Geographical Positioning Systems (GPS) cost saving initiative. Staff left the meeting with field audits of a documented circuit and a circuit in the process of being completed.

MEETING RESULTS

The meeting started with introductions to Ameren Missouri's Vegetation Management and Supervising crew. Ameren Missouri informed Staff that all vegetation activities associated with transmission lines were being managed by an Ameren Missouri employee who reports directly to the Vice President of Transmission. Ameren Missouri distributed and discussed an organizational chart of the Vegetation department. The chart highlights manager and supervisor trimming responsibilities.

After introductions, Ameren Missouri elaborated on its' maintenance schedules, expenditures, mid-cycle patrols, record-keeping processes, and cost savings initiative. In

2007 it increased its budget to stay in compliance with the 4 – 6 year urban and rural trimming cycles. It is roughly 48% and 57% complete with its urban and rural maintenance schedules, respectively, based on its 2010 distribution circuit spreadsheet.

Ameren Missouri has spent \$10.7 million in tracked costs through April 2011. It has lost a significant amount of time due to weather (including the snow in early February) and has hired additional certified tree trimming specialists from private arboricultural companies to assist with its vegetation management. To minimize operator safety hazards, Ameren Missouri puts these specialists through its Contractor Safety Training course to provide them with electrical work training.

Ameren Missouri explained the benefit of the mid-cycle provision to Staff after discussing its' expenditures. Ameren Missouri has been able to address 800 vegetation issues identified during these patrols. It has patrolled 5,300 miles of circuits in 2010. It has also patrolled 4,500 additional miles in 2011 with a 33% completion status.

After discussing the benefits of the mid-cycle provision, Ameren Missouri then broke down its General and Project Record Keeping processes for Staff. Before a contractor executes a vegetation management order, a survey of the scheduled area is first planned. Once the work has been planned and a work order number is generated, the planner attempts to notify the customer, either with a notification letter or hang tag. That information is passed along to a supervisor from one of the following contractors: Wright Tree Service Inc., Nelson Shade Tree Service Company, or Townsend Tree Service Company Inc. The supervisor then gives the vegetation management order to a crew ranging anywhere from 2 – 3 people, including the general foreman. A standard time sheet is used to track crew labor hours and the equipment used for each project. Ameren

Missouri supervisors review the planners' project maps for errors, while the contract supervisors review crew time sheets and trimming results associated with each work order. After reexamining the completed work, reports are processed on a weekly basis by Ameren Missouri in order to compensate the work crew for its labor and production costs. After explaining its' record-keeping process to Staff, Ameren Missouri opted to give Staff copies of the time sheets for one month. Staff revisited provisions Rule 4 CSR 240-23.030(4)(F)2 and (6)(B)3 with Ameren Missouri's vegetation management personnel. Staff recommended to Ameren Missouri that it include verbiage from its Outage/Response Standard in its 2011 report. Due to the voluminous data, Ameren Missouri volunteered to send samples of the tree trimming documents with the names of Supervisors in its future filings. Furthermore, Ameren Missouri plans to expand its 2010 distribution circuit spreadsheet regarding its 2011 trim dates to add new substations, then send the updated spreadsheet to Staff by December 1, 2011.

After discussing its record-keeping processes, Ameren Missouri introduced a cost saving initiative that involves the use of Geographical Positioning Systems (GPS). The GPS system allows Ameren Missouri to track contractor movements in 2 – 3 minute real-time intervals. This helps Ameren Missouri determine the shortest routes to take in unloading tree debris, which in return helps save on gas consumption and disposal fees. The GPS system has also allowed Ameren Missouri to retrieve three (3) stolen ATV's within a matter of minutes. Ameren Missouri is still conducting a cost study analysis to determine whether the savings outweigh the expenses.

After hearing the overview of Ameren Missouri's maintenance schedules, expenditures, mid-cycle patrols, record-keeping processes, and cost savings initiative, Staff

joined Vegetation Manager, R. M. Wiesehan, and Managing Supervisor, Rick Schenk, for a timesheet audit as well as a crew visit. The timesheet audit took place at 675 Old Ballas, Creve Coeur, MO, 63141. The vegetation management order at that address consisted of a two man bucket crew. Staff was told that all trimming debris either gets hauled off immediately after each job or is piled up, per the customers' requests. Staff also got to see a Nelson Shade Tree Service three-man bucket crew execute a vegetation management order in the St. Louis area. Ameren Missouri has teamed up with city municipalities in its vegetation management outreach program to inform the public of proper planting techniques near power line infrastructures.

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OF THE STATE OF MISSOURI

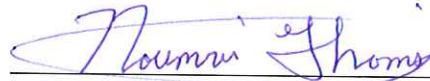
Union Electric Company d/b/a Ameren)
Missouri's Annual Vegetation Management)
Report Pursuant to 4 CSR 240-23.030(6)(C))

File No. EO-2011-0325

AFFIDAVIT OF NOUMVI GHOMSI

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Noumvi Ghomsi, 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 provided to 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.



Noumvi Ghomsi

Subscribed and sworn to before me this 3rd day of August, 2011.





Notary Public