

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

In the Matter of Union Electric Company d/b/a)
AmerenUE and a Filing of a Compliance Plan)
Concerning Vegetation Management Standards) **File No. EO-2009-0012**
Pursuant to Missouri Public Service Commission)
Rule 4 CSR 240-23.030.)

NOTICE OF MODIFICATION AND MOTION FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and, pursuant to 20 CSR 4240-23.030(4)(C) and 20 CSR 4240-23.030(11), respectfully states to the Missouri Public Service Commission ("Commission") as follows:

1. Pursuant to its *Final Order of Rulemaking* in File No. EX-2008-0232, the Commission adopted a new rule in 2008 entitled Electrical Corporation Vegetation Management Standards and Reporting Requirements, which is codified at 20 CSR 4240-23.030, formerly 4 CSR 240-23.030.

2. Subsection (4)(C) of the rule provides, in part, that: "Each electrical corporation shall file a copy of its vegetation management standards, guidelines and procedures at the commission by July 1, 2008, with verification by affidavit of an officer who has knowledge of the matters stated herein." On July 1, 2008, the Company filed its *Vegetation Management Program and Practices* in File No. EO-2009-0012.

3. Subsection (4)(C) further provides that:

If an electrical corporation makes a change in its vegetation management standards, guidelines or procedures, it shall file a copy of the change at the commission no later than thirty (30) days prior to implementing the change, with verification by affidavit of an officer who has knowledge of the matters stated herein.

Ameren Missouri filed copies of changes to the *Vegetation Management Program and Practices*, in EO-2012-0278 on February 14, 2012, and in this case on December 4, 2019.

4. Ameren Missouri has divided the original *Vegetation Management Program and Practices* into separate documents for distribution and transmission. Pursuant to 20 CSR 4240-23.030(4)(C), attached hereto are copies of updated *Ameren Distribution Vegetation Management Program Practices* and *Ameren Transmission Vegetation Management Strategy*. Additionally, copies with changes noted are attached for reference. Ameren Missouri intends to implement these updated distribution and transmission compliance plans on May 1, 2024.

Motion for Variance of 20 CSR 4240-23.030(4)(C)

5. 20 CSR 4240-23.030(11) provides a variance may be granted from this rule for good cause shown.

6. Due to changes in personnel, some changes to the distribution and transmission plans were made and filings to notify the Commission of those changes within 30 days were inadvertently missed. The changes include:

- Changes to the post patrol audit targets and form used to document audits (Appendix A1-B in the distribution plan);
- Use of a new form to document review of crew timesheets (Appendix B-1 in the distribution plan); and
- Use of new procedures and forms in the transmission plan for annual work plans (Appendix A-1), inspection procedures (Appendix A-2), clearance specifications and work practices (Appendix A-3), mitigation procedures (Appendix A-4), quality control/audit procedures (Appendix A-5), job briefing observation audits (Appendix B-1), job site safety audits (Appendix B-2), job site work audits (Appendix B-3), herbicide efficacy work audits (Appendix B-4) and the contractor score card (Appendix C-1).

7. Ameren Missouri apologizes for its oversight and is taking steps to prevent this from happening in the future. Specifically, the Company is modifying its internal procedures to add compliance review targets to its Compliance Management Tool. This will schedule review of the distribution and transmission plans on a regular basis to ensure the Company notifies the Commission of any intended changes 30 days prior to implementation pursuant to Rule 20 CSR 4240-23.030(11).

8. Ameren Missouri requests a variance from the 30-day notice requirement for the changes described in paragraph 6 above.

WHEREFORE Ameren Missouri provides this notice of modification and requests the Commission grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(C) as described herein.

Respectfully submitted,

/s/ Jennifer L. Hernandez

Jennifer L. Hernandez, MO Bar #59814
Corporate Counsel
1901 Chouteau Avenue, MC 1310
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 978-8418 (Telephone)
(314) 554-4014 (Facsimile)
AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 1st day of April 2024.

/s/ Jennifer L. Hernandez

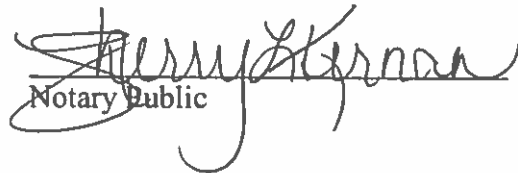
VERIFICATION

STATE OF MISSOURI)
)
CITY OF ST. LOUIS) SS

Ryan M. Arnold, first being duly sworn upon oath, deposes and says that he is Vice President, Energy Delivery of Union Electric Company d/b/a Ameren Missouri, a Missouri corporation; that he is the individual who sponsors the attached plans filed in accordance with 20 CSR 4240-23.030; that said plans were prepared under his direction and supervision; that if inquiries are made as to the facts, he would respond as therein set forth; and that the aforesaid is true and correct to the best of his knowledge, information and belief.


Ryan M. Arnold

Subscribed and sworn before me this 28th day of MARCH, 2024.


Notary Public

