

**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)	<u>File No. EO-2024-0281</u>
Standards Pursuant to Missouri Public)	
Service Commission Rule 4 CSR 240-230.030)	

STAFF’S RECOMMENDATION

Comes now the Staff of the Missouri Public Service Commission (Staff) and provides the Commission with its Report and Conclusion on Ameren Missouri’s Vegetation Management Standards Revisions.¹

On April 1, 2024, Ameren Missouri filed a Notice of Modification and Motion for Variance. On April 5, the Commission ordered Staff to file a Recommendation or a Status Report no later than May 6. Staff subsequently filed a pleading stating that it expected to file its recommendation by June 15. Although no order was issued, Staff is now filing its Recommendation.

On April 1, Ameren Missouri filed its Distribution Program and Practices 2024 and Transmission Vegetation Management Strategy 2024. Commission Rule 20 CSR 4240-23.030(4)(C) requires electric utilities to provide notification of revisions to its vegetation management standards, guidelines or procedures prior to implementation. In this case Ameren Missouri implemented revised procedures prior to notifying the Commission, and, thus, has requested a variance from 20 CSR 4240-23.030(4)(C).

Staff has reviewed Ameren Missouri’s filings, and its review and findings are set out fully and in detail in the Staff Report and Conclusion on Ameren Missouri’s Vegetation

¹ Union Electric Company d/b/a AmerenUE will be referred to as Ameren Missouri. All date references will be to 2024 unless otherwise stated.

Management Standards Revisions (“Report”) filed in EFIS with this cover pleading. Based upon its review and findings, Staff recommends that the Commission accept Ameren Missouri’s notice of Modification and grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(C). As explained in its Report, Staff also recommends that the Commission grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(A).

WHEREFORE, Staff prays that the Commission will accept this pleading as compliant with its orders.

Respectively Submitted,

/s/ Paul T. Graham

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 12th day of June, 2024.

/s/ Paul T. Graham

MEMORANDUM

TO: Missouri Public Service Commission Case File
Case No. EO-2024-0281 Ameren Missouri's Vegetation Management Standards Revisions

FROM: Coty L. King, Engineering Analysis

/s/ Claire M. Eubanks, PE / June 12, 2024
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Ameren Missouri's Vegetation Management Standards Revisions

DATE: June 12, 2024

SUMMARY

On April 1, 2024, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed notice of its Vegetation Management Standards Revisions in Case No. EO-2024-0281. Staff reviewed the Company's variance request and attached revised policies titled *Ameren Missouri Distribution Program and Practices* and *Ameren Transmission Vegetation Management Strategy*, both dated March 2024 ("Revision"). Based on its review, Staff recommends the Commission accept Ameren Missouri's notice of modification and grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(C). Additionally, Ameren Missouri did not request a variance from 20 CSR 4240-23.030(4)(A); however, Ameren Missouri's proposal includes modifications to incorporate a new version of ANSI Z133.1- 2017 rather than the 2006 version incorporated by reference into Commission rules. Staff recommends the Commission grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(A) to allow Ameren Missouri to incorporate ANSI Z133.1- 2017 into its procedures.

OVERVIEW

Commission rule 20 CSR 4240-23.030(4)(C) requires electric utilities to provide notification of revisions to its vegetation management standards, guidelines or procedures prior to implementation. In this case Ameren Missouri implemented revised procedures prior to notifying the Commission, and, thus, it requested a variance from 20 CSR 4240-23.030(4)(C).

Ameren is proposing changing its original *Vegetation Management Program and Practices* into separate documents for distribution and transmission. The rule states, in part, “A variance from a provision of this rule may be granted only for good cause shown.” Subparagraphs 20 CSR 4240-23.030(11). Separating Ameren Vegetation Management Program and Practices into two documents that align with Ameren’s departments is reasonable. In addition to separating its program documents, Ameren Missouri made the following major revisions:

- Ameren has improved its quality control process for work completed by contractors¹;
- New forms were added to document crews’ timesheets;
- Use of new procedures and forms in the transmission plan for annual work plans, inspection procedures, clearance specifications and work practices, mitigation procedures, quality control/audit procedures, job briefing observation audits, job site safety audits, job site work audits, herbicide efficacy work audits and the contractor score card.

DISCUSSION

Commission rule 20 CSR 4240-23.030(4)(C) requires electric utilities to provide notification of revisions to its vegetation management standards, guidelines or procedures prior to implementation. In this case Ameren Missouri implemented revised procedures prior to notifying the Commission. The Company has modified its internal procedures to add compliance review targets to its Compliance Management Tool.² This will ensure the Company notifies the Commission of any intended changes 30 days prior to implementation pursuant to Commission rule 20 CSR 4240-23.030(4)(C).

The proposed changes to *Ameren Missouri Distribution Program and Practices* and *Transmission Vegetation Management Strategy* are consistent with the requirements of 20 CSR 4240-23.030 except in one instance. Commission rule 20 CSR 4240-23.030(4)(A) states:

Each electrical corporation shall ensure that vegetation management conducted on its energized distribution conductors is performed in accordance with the following applicable

¹ By revising its post patrol audit targets and associated form.

² Ameren Notice of Modification and Motion for Variance, page 3, paragraph 7.

standards, which are hereby incorporated by reference, **include no later amendments** or additions, are on file with the commission's data center and available for inspection:

1. "Pruning, Trimming, Repairing, Maintaining, and Removing Trees, and Cutting Brush—Safety Requirements, 2006." This document, also known as ANSI Z133.1- 2006, is published by the American National Standards Institute, 1819 L Street, N.W., Suite 600, Washington, DC 20036;
2. Part 1 of the document entitled "Tree, Shrub, and Other Woody Plant Maintenance—Standard Practices, 2001." This document, also known as ANSI A300-2001, is published by the American National Standards Institute, 1819 L Street, N.W., Suite 600, Washington, DC 20036; and (**emphasis added**)

Ameren Missouri has adopted the 2017 version of ANSI Z133.1 in its Revisions.³ Staff reviewed the 2017 version of ANSI Z133.1 and based on Staff's review it appears the newer standard provides updated practices for safety procedures, updated tables for electrical hazards, soil management, and climbing procedures. Therefore, Staff recommends the Commission grant Ameren Missouri a variance to implement the 2017 version of ANSI 133.1 in its distribution vegetation management program rather than the older version required by rule. Staff will explore revising this rule as time allows.

RECOMMENDATION:

On April 1, 2024, Ameren Missouri filed notice of its Vegetation Management Standards Revisions in Case No. EO-2024-0281. Based on its review, Staff recommends the Commission accept Ameren Missouri's notice of modification and grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(C). Additionally, Ameren Missouri did not request a variance from 20 CSR 4240-23.030(4) (A); however, Ameren Missouri's proposal includes modifications to incorporate a newer version of ANSI Z133.1. Staff recommends the Commission grant Ameren Missouri a variance from 20 CSR 4240-23.030(4)(A) to allow Ameren Missouri to incorporate ANSI Z133.1-2017 into its procedures.

³ On page 4 of the Ameren Missouri Distribution Program and Practices references ANSI133.1-2017 which is a typo and will be corrected

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File No. EO-2024-0281

AFFIDAVIT OF COTY L. KING

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW COTY L. KING and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

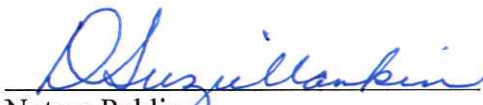


COTY L. KING

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 7th day of June 2024.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public