

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 3rd day of July, 2024.

In the Matter of Union Electric Company)
d/b/a Ameren UE and a Filing of a Compliance)
Plan Concerning Vegetation Management)
Standards Pursuant to Missouri Public)
Service Commission Rule 20 CSR 240-)
23.030)

File No. EO-2024-0281

ORDER GRANTING VARIANCE

Issue Date: July 3, 2024

Effective Date: August 2, 2024

On April 1, 2024, Union Electric Company d/b/a Ameren Missouri filed a Notice of Modification and Motion for Variance. 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. Thus, Ameren Missouri requested a variance from 20 CSR 4240-23.030(4)(C).

The Commission's Staff (Staff) filed its Recommendation on June 12, 2024. Staff notes that Ameren Missouri has modified its internal procedures to add compliance review targets to its Compliance Management Tool. This will ensure Ameren Missouri notifies the Commission of any intended changes 30 days prior to implementation pursuant to Commission Rule 20 CSR 4240-23.030(4)(C). Staff further believes that separating Ameren Missouri's Vegetation Management Program and Practices into two documents

that align with its departments is reasonable. Thus, Staff recommends granting the variance.

In addition, Staff recommends the Commission grant Ameren Missouri a variance from Commission Rule 20 CSR 4240-23.030(4)(A). That rule states in relevant part:

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

Ameren Missouri has adopted the 2017 version of ANSI Z133.1 in its Revisions. Staff reviewed the 2017 version of ANSI Z133.1. 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 further states that it will explore revising this rule. No responses to Staff's Recommendation were received.

Under 20 CSR 4240-23.030(11), the Commission may grant a variance for good cause shown. The Commission finds good cause for the variance from Commission Rule 20 CSR 4240-23.030(4)(A) and (C). Thus, the Commission will grant the requested relief.

THE COMMISSION ORDERS THAT:

1. Ameren Missouri's Motion for Variance is granted.
2. Ameren Missouri is granted a variance from Commission Rule 20 CSR 4240-23.030(4)(A) to incorporate ANSI Z133.1-2017 into its procedures and is granted a one-time variance from Commission Rule 20 CSR 4240-23.030(4)(C).
3. This order shall become effective on August 2, 2024.
4. This file shall be closed on August 3, 2024.



BY THE COMMISSION

A handwritten signature in black ink that reads "Nancy Dippell". The signature is written in a cursive, flowing style.

Nancy Dippell
Secretary

Hahn, Ch., Coleman, Holsman
Kolkmeier, and Mitchell CC., concur.

Pridgin, Deputy Chief Regulatory Law Judge

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 3rd day of July 2024.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

July 3, 2024

File/Case No. EO-2024-0281

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Nancy Dippell
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.