

QUESTIONS FOR ELECTRICAL CORPORATIONS

A. Foundational Questions

1. Describe and document how current policies, procedures, and plans consider the risks of wildfires. In your response, specifically consider the current vegetation management plan, policies and procedures regarding infrastructure inspection standards, and other emergency or restoration plans.

Ameren Missouri's Wildfire Mitigation Plan activates wildfire mitigation practices into operating procedures for both our vegetation management program and infrastructure inspection program on days with Elevated Fire Danger or Red Flag Warnings, as declared by the National Weather Service. Many of our System Hardening upgrades help to mitigate the risk to reliability from severe storms, but also risk of wildfires by upgrading aged and deteriorated overhead poles and conductors with stronger modern equipment. Wildfire risk has not yet been specifically implemented into our Emergency Action Plans. The FEMA National Risk Index indicates our service territory has a relatively low risk of wildfire. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our Wildfire Mitigation Plan, as necessary.

While it is in its early development stage, we are happy to provide a copy of our Wildfire Mitigation Plan upon request.

2. Describe your experience communicating with state and local governments regarding wildfires and/or wildfire risk in your service territory.

Ameren Missouri collaborated and established key contacts with the US Forest Service on protocols for wildfire for the Mark Twain National Forest in November of 2024. We have also provided high-level information about our wildfire mitigation strategy with the Missouri Department of Public Safety's Office of Homeland Security.

3. Do you have insurance coverage for wildfire damage? If yes, does your insurance coverage require you to have a wildfire mitigation plan (WMP) or make any special preparations regarding wildfires? Please explain.

Yes, Ameren Missouri has wildfire liability insurance coverage. A Wildfire Mitigation Plan is not required for the insurance, however, it is helpful in securing coverage and explaining to underwriters what mitigations are being taken.

4. Have you developed a Public Safety Power Shutoff (PSPS) policy with respect to wildfires? If a PSPS policy exists, please describe:

a.) How customers are notified.

b.) Whether medically vulnerable or critical infrastructure customers are prioritized for communication or assistance.

c.) How commercial and industrial or other customer types are notified.

Ameren Missouri does not currently have a PSPS policy. We are considering the development of one, taking into account the level of risk in our territory and the mitigation benefits and disruptions that are involved in such a policy and mitigation measure of last resort.

5. If you do not currently have a wildfire-specific policy or WMP, do you plan to develop one? What is the anticipated timeline?

Ameren Missouri has an active Wildfire Mitigation Plan that focuses on preventing fires potentially caused by Ameren field personnel.

B. Risk Assessment & Mapping

1. Please explain, for planning purposes, your ability to reliably model various climate and weather scenarios. Specifically, discuss your ability to understand how changing weather patterns impact wildfire risk across your grid.

Ameren Missouri currently gathers information and data for the service territory from the National Weather Service (NWS) offices: St. Louis, Lincoln, Paducah, Springfield, Pleasant Hill, Quad Cities, Memphis, and Chicago. The team reports both Red Flag and Elevated Fire Danger warnings for the service territory. Red Flag Warning notifications automatically push to Distribution, Transmission and Operating teams using Ameren's emergency notification system. Weather patterns' impact on wildfire risk is not modeled. We will continue to evaluate additional tools and resources for our Wildfire Mitigation Plan as we monitor the risk of wildfire in our service territory.

2. If you have implemented a WMP, what types of climate and weather scenarios have been modeled?

Ameren Missouri's Wildfire Mitigation Plan is activated by fire weather notifications from the National Weather Service, including Elevated Fire Danger and Red Flag Warnings. No other climate or weather modeling solutions have been implemented, but Ameren Missouri continues to assess the offerings in the market that provide this functionality and to assess their value-add to our processes.

3. Have you included sources of ignition from external causes when developing the WMP?

Ameren Missouri's current Wildfire Mitigation Plan does not include external sources of ignition and is focused on mitigating the risk of fire caused by Ameren Missouri co-workers. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our Wildfire Mitigation Plan as necessary.

4. Are there any utility-owned models or partnerships (e.g., with universities or NOAA) for fire spread or risk prediction?

Ameren Missouri's Crisis Management team collaborates with the National Weather Service to provide guidance on fire weather planning developments. According to the latest FEMA National Risk Index for wildfire risk, Ameren Missouri's overall service territory continues to be low risk for catastrophic wildfire.

C. Situational Awareness & Forecasting

1. Describe the types of weather variables collected for your situational awareness during weather or other unforeseen events, including wildfires.

Ameren Missouri receives weather forecasts from a third-party meteorologist, DTN, for Temperature, Flooding, Wind, Snow, Precipitation, Ice, and Thunderstorm impact. We also receive weather notifications issued by the National Weather Service, including Fire Weather Watch, Elevated Fire Danger, and Red Flag Warning.

2. Describe the types of weather variables collected for forecasting purposes.

Ameren Missouri receives weather forecasts from a third-party meteorologist, DTN, for Temperature, Flooding, Wind, Snow, Precipitation, Ice, and Thunderstorm impact. We also receive weather notifications issued by the National Weather Service, including Fire Weather Watch, Elevated Fire Danger, and Red Flag Warning.

3. Do you use third-party weather services or modeling software (e.g., IBM's Weather Company, NCAR tools) for predictive analytics related to wildfire conditions?

Ameren Missouri leverages a third-party meteorology service, DTN, for weather forecasting for our service territory. At this time, wildfire prediction is not a service we receive from DTN. As we monitor wildfire risk in our service territory, we will continue to evaluate additional tools and resources for our Wildfire Mitigation Plan.

4. How is situational data integrated into operational systems (e.g., SCADA, ADMS)?

Ameren Missouri actively monitors and collects situational data such as wind speed, air temperature, and river water levels. We also collect information and data from the National Weather Service including Red Flag and Elevated Fire Danger warnings for the service territory. While these various environmental factors are not directly integrated into SCADA or ADMS, Ameren Missouri uses them to inform operational decisions to optimize safety and reliability.

D. Grid Design & System Hardening

1. Please describe how you prioritize WMP initiatives across your service territory.

In addition to supporting customer reliability and hardening the grid, many Smart Energy Plan investments help to mitigate wildfire risk. Examples of these investments include installing composite poles, armless construction, and utilizing wind-resistant conductors. Ameren Missouri has not yet prioritized investments or initiatives based solely on wildfire risk, but is open to incorporating the wildfire risk in its investment strategy as necessary.

Mitigation measures described in the current Wildfire Mitigation Plan are focused on a county-by-county basis when a county is declared to be under a Red Flag Warning or Elevated Fire Danger by the National Weather Service.

2. Have any overlap with components of your vegetation management or major asset maintenance plans been identified? If so, please explain.

Our current vegetation management and asset maintenance programs do not specifically incorporate wildfire risk prevention. However, there are elements of these programs that help reduce the risk of a fire, such as regular vegetation trimming away from the conductor and ensuring our assets are properly maintained.

3. Please describe if you have deployed or plan to deploy:

- a.) Covered conductors
- b.) Fire-resistant poles or hardware
- c.) Remote fault indicators
- d.) Undergrounding of lines in high-risk areas

Ameren Missouri is actively deploying composite poles, fiberglass crossarms or armless construction, limited undergrounding, and piloting remote fault indicators. Covered conductors are not actively being deployed for wildfire mitigation. We have not yet prioritized investments or initiatives based solely on wildfire risk, but we are open to modifying the investment strategy to incorporate wildfire risk mitigation specifically, as necessary. Many of our System Hardening upgrades help to mitigate the risk of wildfires by upgrading aged and deteriorated overhead poles, hardware, and conductors. We continue to assess the risk of our system to determine if additional or more targeted upgrades are necessary on our system.

E. Asset Management & Inspections

1. Has an inventory of assets and a condition rating of those assets been conducted?

The latest inspection report was filed with the MPSC in File No. EO-2024-0380 (*In the Matter of Union Electric Company d/b/a Ameren Missouri's 2023 Infrastructure Inspection Annual Report*), and its next report will be filed with the Commission on July 1, 2025. Ameren Missouri regularly inspects its assets in compliance with the Missouri Electric Utility Operational Standards (20 CSR 4240-23.020). This is done visually from both the ground and by utilizing drones. Intrusive inspections are also performed as required by 20 CSR 4240-23.020. Asset conditions are assigned a "Pass/Fail" designation. Assets in impaired condition are replaced or upgraded.

2. Describe how your inspection practices, including, but not limited to, inspections conducted pursuant to 20 CSR 4240-23.020, may be leveraged for development of a WMP.

Ameren Missouri's asset inspection practices are not considered in our current Wildfire Mitigation Plan.

F. Vegetation Management & Inspections

1. What level of vegetation inventory and condition assessments have been made within your service area?

Ameren Missouri maintains an inventory of vegetation type (tree v. brush) around our distribution lines. The framework to produce an inventory by vegetation species is in development. Conditional assessments are made in accordance with the Missouri Electric Utility Operational Standards.

2. Do you use remote sensing (LiDAR, satellite, or drone imagery) to support vegetation assessments?

Ameren Missouri does not currently leverage remote sensing to support vegetation assessments. We are actively evaluating how these technologies can enhance our vegetation management program.

G. Grid Operations & Protocols

1. Has an analysis been made of the various protective equipment and device settings that would be needed or used to implement a WMP?

Ameren Missouri leverages protective equipment (e.g., smart switches, SCADA, and microprocessor relays) but has not analyzed configurations or device settings for its current Wildfire Mitigation Plan. Sources such as the FEMA National Risk Index indicates our service territory has a relatively low risk of wildfire. As we monitor the risk of wildfire in our service

territory, we will continue to enhance and refine our Wildfire Mitigation Plan including any necessary changes to equipment and devices as necessary.

H. Data Governance

1. Have you considered what types of data it would be necessary to utilize for the implementation of a WMP, and how and where that data would be stored? If so, please explain.

Ameren Missouri's current Wildfire Mitigation Plan utilizes fire weather notifications from the National Weather Service. As we monitor the risk of wildfire in our service territory, we will continue to evaluate the utilization of additional data.

2. Have you analyzed existing data, or collected new data to be used in developing and implementing a WMP?

To develop the Wildfire Mitigation Plan, Ameren Missouri analyzed historical National Weather Service data and current FEMA Wildfire risk indexes for our service territory. Recent trends show an average of 2-5 fire weather warnings per year for portions of our service territory, while the FEMA National Risk Index indicates our service territory has a relatively low risk of wildfire.

3. Have you evaluated data aggregation and identified any sources of data that are siloed which need to be incorporated?

Ameren Missouri has not evaluated data aggregation or identified siloed data for the implementation of our current Wildfire Mitigation Plan.

I. Resource Allocation Methodology

1. Has an analysis been conducted that would designate how existing resources could be utilized in the implementation of a WMP?

Ameren Missouri's current Wildfire Mitigation Plan utilizes National Weather Service alerts. When fire weather notifications are received, Ameren Missouri's Crisis Management team communicates those notifications to field-based crews and activates our wildfire mitigation protocols. We remain open to enhancing our Wildfire Mitigation Plan to incorporate additional resources, as necessary.

2. Has any analysis been done of utilization of the existing resource allotment based on varying risk scenarios?

Ameren Missouri has not analyzed resource allotments for varying risk scenarios. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our Wildfire Mitigation Plan as necessary.

3. Have any additional needed resources required to implement a WMP been identified?

No additional resources were needed to implement our current Wildfire Mitigation Plan. As we continue to refine our Wildfire Mitigation Plan, we will assess the need for additional resources.

4. Are there internal or external constraints limiting the ability to fully implement a WMP?

No constraints limit Ameren Missouri's ability to implement the current Wildfire Mitigation Plan. Enhancements to our Wildfire Mitigation Plan will be subject to the same constraints that impact all of our investments, including labor resources, regulatory compliance, and budgetary limitations.

J. Emergency Planning & Preparedness

1. If a WMP has been created, please describe if or how it has been integrated with any other overall disaster or emergency plans (prepared by any State or local entity).

Ameren Missouri's Wildfire Mitigation Plan has not been explicitly integrated into state or local emergency plans at this time. In the event of a wildfire, crews are instructed to call 911. We utilized the Missouri State Emergency Management Agency's (SEMA) Hazard Mitigation Plan to inform the development of the Ameren Missouri Wildfire Mitigation Plan. SEMA categorizes Wildfire risk as low to moderate for the region.

2. Do you participate in annual tabletop or full-scale wildfire response exercises with state or local agencies?

Ameren Missouri is unaware of wildfire response exercises at the state or local level. Outside of wildfires, we have multi-year training and exercise plans across the enterprise which incorporate state and local agencies. These include exercises at the Callaway, Taum Sauk, and Osage energy centers.

3. Have you collaborated with investor owned utilities, rural electric cooperatives and/or municipally owned electrical suppliers for communication and integrating emergency plans?

During emergencies, Ameren Missouri collaborates with other utilities/cooperatives through mutual assistance agreements. We also participate in best-practice sharing across the industry through informal meetings, Chartwell's Emergency Management Leadership Council, and by attending conferences/webinars through the Edison Electric Institute and the Electric Power Research Institute.

K. Stakeholder Cooperation & Community Engagement

1. Has a procedure been developed to share information and support other utilities your utility coordinates with, including rural electric cooperatives and/or municipally owned electrical suppliers?

Ameren Missouri does not have a specific procedure for information sharing. Municipalities and cooperatives are notified of planned work outages that impact interconnected lines. We also collaborate through informal benchmarking meetings, conferences, and open houses. Specifically, Ameren Missouri participates in best practice sharing through Chartwell's Emergency Management Leadership Council and the Edison Electric Institute.

2. Please describe if there has there been any education or involvement of the public about the various components of an existing (or proposed) WMP.

Ameren Missouri has not published details about our Wildfire Mitigation Plan to the public.

3. Are you willing to share your GIS system maps with the Missouri Public Service Commission and/or State Emergency Management Agency during emergencies? If no, please explain why. If you would be willing but there are constraints, please specifically explain them with citations if necessary.

Ameren Missouri would support a secure method to share information with the MPSC and/or State Emergency Management Agency during a crisis to minimize risk of loss of life or increased damages. Any information shared will need to comply with the NERC information security standards we are subject to.