

QUESTIONS FOR GAS CORPORATIONS

A. General

1. Please explain how the threat of wildfires is addressed in Emergency Plans (see 20 CSR 4240-40.030(12)(J) for emergency plan requirements). Does your Emergency Plan include wildfire-specific triggers, response timelines, or communications protocols? If so, please describe.

Ameren Missouri's Emergency Plan is found in Section 7.0 of the *Ameren Missouri Gas Operations & Maintenance Plan*. The threat of fires is addressed in the Emergency Plan within the section on Fire, Ignition, or Explosion. While wildfires are not specifically mentioned, the response would be similar to that of any fire. The FEMA National Risk Index indicates that our service territory has a relatively low risk of wildfire. The Emergency Plan does not currently include wildfire-specific triggers, response timelines, or communications protocols. However, it does call out specifically the need to evaluate the situation to determine if fire presents a hazard to life or property, notify appropriate authorities including the Fire Department, and control the flow of gas to minimize hazards to life and property.

2. Have you met with local emergency responders (e.g. fire, police) to discuss coordinated responses to wildfires (see 20 CSR 4240-40.030(12)(J)1.B.)? If “yes”, please describe the outcome of these meetings.

While we have not met with local emergency responders to specifically discuss coordinated responses to wildfires, we communicate annually and meet with local emergency responders in accordance with 20 CSR 4240-40.030 (12)(J)(1)B. We share and discuss information regarding the risk and response to fires, in general, near natural gas facilities.

3. Have you provided any information or instructions to your customers regarding actions that should be taken with respect to natural gas service in the event of wildfire evacuations (e.g. closing valve at service riser)? If “yes”, please explain what actions you have recommended, and also please explain how this information is disseminated (e.g., door tags, emergency preparedness mailers, website alerts)?

No specific guidance is provided to customers regarding actions that should be taken with respect to natural gas service in the event of wildfire evacuations. However, natural gas safety material is provided discussing the flammability hazards of natural gas leaks, how to identify leaks, safety steps to take in the event a leak occurs, and damage prevention practices through use of the 811 one-call system.

4. Have you evaluated the temperature ratings of your above ground natural gas or renewable natural gas assets (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the following:
 - a.) Ability of above ground pressure reduction equipment (e.g. regulator stations and farm taps) to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.

No evaluation has been completed for above-ground pressure reduction equipment.

b.) Ability of service regulators to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.

No evaluation has been completed for service regulators.

c.) Potential disruptions in SCADA (supervisory control and data acquisition) communications between monitored and controlled physical assets and control room.

Contingency plans and procedures are in-place for disruptions in SCADA communications between monitored physical assets and the gas control room. Ameren Missouri does not have any remotely controlled assets.

5. Have you evaluated the temperature ratings and burial depths of your plastic piping systems with respect to the potential for heat damage if ground surface above is involved in a wildfire? If “yes”, please describe the outcome of that evaluation.

Ameren Missouri has not performed a formal evaluation of the temperature ratings and burial depths of plastic piping systems with respect to the potential for heat damage.

6. Have you evaluated the temperature ratings of your natural gas or renewable natural gas assets in vaults (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the ability of pressure reduction equipment to control downstream pressure in the event of a wildfire at ground surface? If “yes”, please describe the outcome of that evaluation.

Ameren Missouri does not have any natural gas assets in vaults.

7. Do you partner with fire departments or other agencies to communicate and respond to fires and wildfires? If yes, please explain.

Yes, Section 7.13 of the Emergency Plan, requires the notification of and coordination with appropriate authorities, including the Fire Department, for fire related emergencies. This would include wildfires.

8. Do you have insurance coverage for wildfire damage? If “yes”, does your insurance coverage require you to have a wildfire mitigation plan or make any special preparations regarding wildfires? If not currently insured against wildfire risk, please explain why and whether coverage has been denied or deemed unavailable or uneconomical.

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

B. Natural Gas and Renewable Natural Gas Distribution Systems

1. Does your current Distribution Integrity Management Plan (DIMP) address the threat of wildfires? Please explain.

The threat of failure due to high temperatures is considered a potential threat in the DIMP. It is not specific to wildfires but would apply to any circumstance where wildfires resulted in such conditions.

C. Natural Gas and Renewable Natural Gas Transmission Systems

1. How is the threat of wildfires addressed in your transmission integrity management program?

The threat of high temperature is considered in the Transmission Integrity Management Program (TIMP) and is included with Weather and Outside Force Threats. This would apply to any circumstance where wildfires resulted in such conditions.

D. Infrastructure Resilience & Risk Assessment

1. What steps have you taken to assess wildfire risks near pipelines and critical infrastructure?

Because sources such as the FEMA National Risk Index indicate that our service territory has a relatively low risk of wildfire, Ameren Missouri has not yet procured the performance of a wildfire risk assessment for gas facilities.

2. How do you protect gas transmission and distribution systems from wildfire damage?

Right of ways and easements are cleared periodically which limits the proximity and density of fuel sources. Many pressure regulating stations are surrounded by gravel or hard surfaced areas and maintained free of vegetation. Additionally, excess flow valves (EFV) are installed on new services and farm taps. Installation of EFVs is a preventive measure not limited to the threat of wildfires.

3. Are there plans to upgrade or harden gas infrastructure in wildfire-prone areas?

Because sources such as the FEMA National Risk Index indicate that our service territory has a relatively low risk of wildfire, there are currently no plans to make out-of-cycle system investments to upgrade or harden gas infrastructure outside of our normal system maintenance. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our investment strategy, as necessary.

4. Have you identified high-risk zones where wildfire-related damage to gas pipelines is most likely?

No, we have not identified high-risk zones where wildfire-related damage to gas pipelines is most likely. Sources such as the FEMA National Risk Index indicates our service territory have indicated that 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.

E. Emergency Response & Safety Protocols

1. What protocols are in place for shutting down gas service in areas threatened by wildfires?

The Emergency Plan requires evaluation for a fire situation, determination if fire presents a hazard to life or property, notification of appropriate authorities including the Fire Department, and control of the flow of gas to minimize hazards to life and property. This procedure would be followed to determine if an area required isolation due to wildfire.

2. Do your emergency procedures address isolating gas to specific locations by use of below-ground inlet valves at district regulator stations? If “no”, please explain what alternative measures you could use to isolate the flow of gas to specific locations during a wildfire event.

Yes. In compliance with 20 CSR 4240-40.030(13)(V), Emergency Valve designations and isolation zones are maintained by emergency procedures (Section 8.0 in *Ameren Missouri Gas Operations & Maintenance Plan*).

3. How do you coordinate emergency response efforts with fire departments and local agencies?

Section 7.13 of Ameren Missouri's Emergency Plan, which covers fires, specifically calls out the need to evaluate the situation to determine if fire presents a hazard to life or property and notification of appropriate authorities including the Fire Department. Ameren Missouri's Public Awareness Program implemented in accordance with 20 CSR 4240-40.030(12)(K) maintains ongoing relationships with local fire departments. Additionally, Operations has coordinated mock emergency response drills to exercise coordinated emergency responses using incident command system protocol.

4. Have you coordinated with emergency management to ensure that critical infrastructure is continuously supplied in the case of damage to gas supply infrastructure or the need for shutoff?

While this not been a situation Ameren Missouri Gas Operations has encountered, our Emergency Response plan requires controlling the flow of gas to minimize hazards to life and

property. Consideration would be given to maintaining service to critical infrastructure, if possible, during any response.

5. How quickly can you restore gas service after wildfire-related disruptions?

This would depend entirely on the circumstances of each situation. Current procedures contain guidance for a loss and restoration of service and can be scaled to apply to the size of any outage.

6. What measures are taken to prevent underground pipelines from being compromised by extreme heat?

Pipes and underground facilities are installed at minimum depths (18in for service lines, 24in. for mains) in accordance with safety regulations 20 CSR 4240-40.030(8)(G)1 and 20 CSR 4240-40.030(7)(N). Because of the comparatively low wildfire risk in Ameren Missouri's service territory as demonstrated by sources such as the FEMA National Risk Index, no additional measures have yet been taken to prevent underground pipelines from being compromised by extreme heat. Ameren Missouri intends to continue monitoring the risk to determine if such additional capital expenditures are warranted.

F. Pipeline Integrity & Post-Wildfire Damage Assessments

1. What inspections are conducted to ensure gas pipeline integrity after a wildfire?

Ameren Missouri's procedures for responding to any natural disaster (which would include wildfires) require the verification that facilities have not been damaged and that necessary repairs have been completed. This would include the performance of additional leak surveys, pipeline patrols, tests, and any other checks as deemed necessary to ensure integrity and safe operation.

2. How do you monitor and prevent leaks or explosions caused by wildfire-damaged infrastructure?

The Emergency Plan calls out the need to evaluate any fire situation (which would include wildfire) to determine if it presents a hazard to life or property, and subsequent to this, the need to control the flow of gas to minimize hazards to life and property. Following a fire event, additional checks are performed, as deemed necessary, to determine continued integrity and safe operation.

3. Are there contingency plans for replacing pipelines in fire-damaged areas?

Following any fire event, Ameren Missouri would perform any additional checks, as deemed necessary, to determine continued integrity and safe operation. Results of these checks would determine the extent of any necessary replacements. However, Ameren Missouri does not have a contingency plan for replacing pipelines in fire-damaged areas specific to wildfire damage. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our Wildfire Mitigation Plan as necessary.

G. Customer Communication & Public Safety

1. How do you notify customers of wildfire-related service disruptions or potential safety hazards?

Ameren Missouri has communication tools available to send messages or phone calls to customers in an identified area or outage zone. In the event of a wildfire, these tools could be used for the communication of disruptions or potential safety hazards.

2. What public education efforts are in place to inform customers about wildfire-related gas safety measures?

We provide overall natural gas safety material that discusses the flammability hazards of natural gas leaks, how to identify leaks, safety steps to take in the event a leak occurs, and damage prevention practices through use of the 811 one-call system. This general gas safety material would be applicable to a wildfire situation. However, Ameren Missouri does not have specific public education material concerning specific wildfire-related gas safety measures since the risk profile in our service territory is low. However, we will continue to monitor the risk posture and adjust if necessary.

3. Are customers provided with clear guidance on when and how to shut off their gas supply during a wildfire?

Ameren Missouri does not provide customers with guidance on when/how to shut off their gas supply. It is not advisable that customers shut off their own gas. This information is provided to Emergency Response Officials.

4. Are emergency contact procedures clearly communicated to residents in wildfire-prone regions?

Ameren Missouri's emergency contact procedures apply consistently to all customers in our service territory. Facility identification and Ameren emergency contact information is posted on all assets as required by natural gas safety regulations. The FEMA National Risk Index indicates our service territory has a relatively low risk of wildfire.

5. Do you have a policy with regards to medically vulnerable or critical infrastructure customers and are they prioritized for communication or assistance?

Ameren Missouri maintains a list of critical and medically vulnerable customers. We do not have a written policy with regards to communication or assistance for these groups. However, they are prioritized in the event of a potential service disruption.

6. Do you provide specific guidance to businesses and industrial users on wildfire-related gas safety? Please share specifics.

No specific guidance is provided to businesses and industrial users on wildfire-related gas safety. We provide natural gas safety material that discusses the flammability hazards of natural gas leaks, how to identify leaks, safety steps to take in the event a leak occurs, and damage prevention practices through use of the 811 one-call system. Because our natural gas service territory is low risk, this has not been a priority. However, we will continue to monitor the risk and adjust as needed.

H. Mutual Aid Agreements & Industry Cooperation

1. Do you participate in mutual aid agreements with other gas providers for emergency response? Please provide a copy of a current agreement.

Ameren Missouri participates in a mutual aid agreement with other natural gas utilities thru the American Gas Association (AGA). However, this agreement is highly confidential, so we have not attached it to these comments. Upon request and with appropriate protective orders in place, we will explore with other signatories if we can share this with the Commission, Staff, and the Office of Public Counsel and other signatories participating in this proceeding. In addition to the AGA, our sister company Ameren Illinois would also be available to assist in certain emergency response activities if necessary.

2. How do you coordinate with electric utilities to prevent infrastructure conflicts during wildfire mitigation efforts?

Ameren Missouri has not coordinated with electric utilities to prevent infrastructure conflicts during wildfire mitigation efforts. Ameren Missouri's gas operations does coordinate with electric utilities for the installation of new underground facilities to minimize interference and optimize safety. 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. Are there standardized protocols for sharing wildfire risk data with other utilities and emergency responders?

Because sources such as the FEMA National Risk Index indicate that our service territory has a relatively low risk of wildfire, Ameren Missouri does not have such standardized protocols in place. As we monitor the risk of wildfire in our service territory, we will continue to enhance and refine our Wildfire Mitigation Plan as necessary.