



MISSOURI DEPARTMENT OF CONSERVATION

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JOHN D. HOSKINS, Director

August 15, 2007

FILED
August 15, 2007
Data Center
Missouri Public
Service Commission

Ms. Colleen M. Dale, Secretary
 Missouri Public Service Commission
 P.O. Box 360
 Jefferson City, MO 65102

Re: Commission Case No. EX-2007-0214
 Proposed Rule 4CSR 240-23.030

Dear Ms. Dale:

Thank you for the opportunity to review the proposed rule on *Electrical Corporation Vegetation Management Standards and Reporting Requirements*. The Missouri Department of Conservation would like to identify areas of concern about this proposed rule in its current form.

The Department fully understands the hardships created when electric service is disrupted. Department staff were deeply involved with storm assistance over the last eighteen months. We continue to work with communities, homeowners, and schools to address the damage and to help assure that new trees are properly selected and placed.

The Department recognizes a need for a better balance between vegetation management requirements to assure reliable electric service and the many benefits that community trees provide. Specific concerns include:

- The requirement in (5) *Transmission Line Vegetation Management*. (B) 2. that all trees under the specified power lines be removed regardless of the situation. There are instances where trees would be very unlikely to disrupt service because of how the lines are configured or because of the mature height of the tree.
- The requirement in (2) *General Provisions*. (I) that privately owned trees which are deemed "diseased" must be removed. Only a small number of tree diseases are fatal and would warrant removal of the plant.
- The requirement (2) *General Provisions*. (I) that privately owned trees which are "rotten" must be removed. One wonders how much decay must be present to be considered "rotten". A better approach to consider would be using verbiage that references the tree's structural integrity.

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Ms. Colleen M. Dale, Secretary

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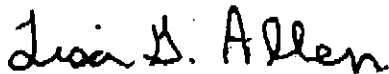
August 15, 2007

Our foresters have an intimate understanding of the *benefits of trees* as well as the *risks associated with them*. This gives us a unique perspective about how to approach long-term planning for the management of Missouri's community trees. The Department would be glad to visit with the Public Service Commission to discuss concerns associated with the proposed rule on vegetation management standards.

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The Department stands ready to assist in the process of developing changes and regulations. Thank you for your time and consideration.

Sincerely,



LISA G. ALLEN
STATE FORESTER

LGA:JTG

c: Director John Hoskins
Assistant Director John Smith
Assistant Director Bob Ziehmer
Forest Management Chief DeeCee Darrow
Forestry Field Program Supervisor Justine Gartner

MISSOURI DEPARTMENT OF CONSERVATION

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Fax

To: Debbie - Mo Public Service Commission

Date: 8/15/07

Fax:

From: Justine Gartner

Re: Proposed Rule 4CSR 240-23.030

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