

COMMENTS ON PROPOSED MITIGATION PLAN COMPONENTS BY AMEREN MISSOURI'S ELECTRICAL OPERATIONS

I. Wildfire Risk Assessment and Emergency Preparation

1. Evaluate whether publicly available fire weather modeling tools, or a combination of publicly available and utility specific modeling will be most useful in analyzing the risk of wildfire.

Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company") agrees that fire weather modeling tools can be an element for monitoring wildfire risk. We currently work with the National Weather Service ("NWS") to receive elevated fire weather risk notifications (including Red Flag Warnings) and monitor alerts from six NWS offices to ensure full coverage of our service territory. We are evaluating the availability and maturity of additional models, ensuring functionality aligns with the risk level of the territory, affordability and operational needs.

2. Evaluate the risk specific to the electric utility's service area. At a minimum evaluate the following factors:
 - a. Equipment/Assets (e.g. type, age, inspection/maintenance procedures, etc.)
 - b. Topography
 - c. Weather (include statistically extreme conditions and seasonal conditions)
 - d. Vegetation
 - e. Physical vulnerability (e.g. people, structures, critical facilities/infrastructure)
 - f. Access

Ameren Missouri agrees that evaluating the risk of wildfire to our service territory is a best practice. Ameren Missouri is engaging with a specialized third-party, EDM International, Inc. ("EDM"), to develop wildfire risk maps across our service territory. These maps will integrate publicly available data - such as landscape, population, wildland-urban interface, vegetation, weather patterns, and fire history - with Ameren Missouri's utility-specific information, including infrastructure details and service area characteristics.

3. Determine what sources of information are needed for advance warning of wildfires, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)

Ameren Missouri currently works with the NWS to receive elevated fire weather risk notifications (including Red Flag Warnings) and monitor alerts from six NWS offices to ensure full coverage of our service territory. We are evaluating the availability of additional tools and resources that would allow us to assess and monitor wildfire risk at a more granular level, ensuring functionality aligns with the risk level of the territory, affordability and operational needs.

4. Become familiar with functional cellular coverage in advance, to gauge whether additional means of public notification during a wildfire event will be required.

Ameren Missouri does not have the capability to monitor cellular coverage provided by telecommunication carriers. In the event of a wildfire or other emergency, public notification and communication should be the responsibility of county and state emergency management agencies. These agencies are best equipped and authorized to deliver timely, accurate, complete, and coordinated information to the public. During such events, Ameren Missouri will provide emergency management agencies with any relevant or necessary information we have to support their communication efforts and support public safety.

5. Establish internal chain of command prior to a wildfire event.

Ameren Missouri agrees that establishing a chain of command applicable for wildfires is a best practice. Ameren Missouri is working with EDM to help us enhance our current wildfire mitigation plans. Through this engagement, we will establish a wildfire-specific chain of command and response process, building on existing emergency protocols used for major storm events. The result of this engagement will be an enhanced plan in line with industry best practices appropriate for the risk level of our service territory.

6. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area.

Ameren Missouri maintains a contact list for emergency response individuals at neighboring utilities, municipal, county, and state agencies. We also maintain contact with the U.S. Forest Service. Over the next six months, Ameren Missouri will work to review and adjust communication plans with the appropriate parties to respond to wildfire risk as a part of our overall Wildfire Mitigation Plan enhancements.

7. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.

Ameren Missouri will collaborate with emergency management agencies to safely restore power to customers following a wildfire. As part of our engagement with EDM, we will assess the need to establish a process to de-energize lines to aid first responders in safely extinguishing a wildfire.

8. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).

Ameren Missouri is working with EDM to assess the landscape risk of wildfire to our service territory. Using this information, we will develop an enhanced wildfire mitigation plan in line with industry best practices appropriate for the risk level of our service territory.

9. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.

Ameren Missouri is working with EDM to assess the landscape risk of wildfire to our service territory. Using this information, we will develop an enhanced wildfire mitigation plan in line with industry best practices appropriate for the risk level of our service territory.

10. Evaluate what actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.

Ameren Missouri is working with EDM to help us enhance our current wildfire mitigation plans. Through this engagement, we will assess the need for customer action in response to a wildfire threat and establish procedures for communicating these, if necessary.

11. Establish and maintain a prioritization matrix for restoration consistent with other applicable tariffs or procedures.

Currently, the Company plans to follow existing procedures used during severe weather events for restoration prioritization following a wildfire. Ameren Missouri is working with EDM to enhance our wildfire mitigation plan. Through this engagement, we will review our wildfire event response process and review potential enhancements to create a revised plan in line with industry best practices appropriate for the risk level of our service territory.

12. Host or participate in annual tabletop training exercises between electric utility staff and responding agencies.

Ameren Missouri is committed to supporting emergency preparedness and coordination efforts across the state. To promote consistency and alignment with statewide emergency management objectives, we recommend that the Missouri State Emergency Management Agency ("MO SEMA") or other emergency management agency establish best practices and guidelines for these tabletop exercises. This approach will help ensure that all participating entities follow a standardized framework which will enhance overall preparedness.

13. Identify personnel needed within the company and externally to implement each action.
 - a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.
 - b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.
 - c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.

Ameren Missouri is working with EDM to enhance our wildfire mitigation plan. Through this engagement, we will develop a wildfire-specific chain of command and build on existing emergency protocols to create an enhanced plan in line with industry best practices appropriate for the risk level of our service territory. Mutual assistance agreements are in place and would be leveraged in the event of a wildfire, if necessary.

14. Evaluate and anticipate what components would most likely be damaged in a wildfire, in order to decide whether the utility's inventory of spare equipment is sufficient.

Ameren Missouri maintains an inventory of spare components at locations across our service territory to enhance restoration efforts for all emergencies. We also deploy mobile materials trailers to affected areas and maintain relationships with suppliers to quickly replenish materials on short notice if necessary.

II. Wildfire Response and Restoration

1. Coordinate with appropriate local public emergency agencies and officials in the immediate aftermath of wildfire.

Ameren Missouri will collaborate with emergency management offices to safely restore power to customers following a wildfire.

2. Conduct a damage assessment in wildfire affected areas to determine which facilities will need to be inspected and/or tested prior to re-energizing.

Ameren Missouri will assess affected equipment and facilities after a wildfire, replacing or repairing as necessary.

3. Utilize pre-established prioritization matrix to guide restoration activities.

The Company plans to follow existing procedures used during severe weather events for restoration prioritization following a wildfire. Ameren Missouri is working with EDM to enhance our wildfire mitigation plan. Through this engagement, we will review our wildfire event response process and review potential enhancements to create a revised plan in line with industry best practices appropriate for the risk level of our service territory.

4. Prepare a schedule for testing/replacement of heat affected equipment, components and parts.

Ameren Missouri inspects its assets in compliance with Missouri Electric Utility Operational Standards (20 CSR 4240-23.020). Through our engagement with EDM, we will assess the need to establish a procedure for inspecting electric assets for damage after a wildfire.