

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a )  
Working Case for the Development of Best ) File No. OW-2025-0314  
Practices for Wildfire Mitigation in Missouri. )

**ADDITIONAL COMMENTS OF AMEREN MISSOURI**

**COME NOW**, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) and provides these *Additional Comments of Ameren Missouri* (“*Additional Comments*”) regarding the adoption of draft wildfire preparedness, prevention, emergency response, and recovery plans found in Attachments A and B to the Order Setting Time for Responses issued October 31, 2025 (“October 31<sup>st</sup> Order”) by the Missouri Public Service Commission (“Commission”). In support of its position, the Company states as follows:

**INTRODUCTION**

1. On May 14, 2025, the Commission issued its Order Opening a Working Case to Assist in the Development of Best Practices for Utility Wildfire Mitigation in Missouri and Assessment of Risk (“May 14<sup>th</sup> Order”) to establish a working case to “examine the wildfire mitigation preparedness of Commission-regulated utilities in the state of Missouri.” The May 14<sup>th</sup> Order asked that, by June 30, 2025, electrical corporations respond to the questions in Attachment A, and gas corporations respond to the questions in Attachment B. Because Ameren Missouri operates as both an electrical and gas corporation in the state of Missouri, it provided to the Commission its responses to the questions in both attachments on June 30, 2025.

2. In its October 31<sup>st</sup> Order, the Commission requested comments from electrical and gas corporations by December 1, 2025, regarding the feasibility of adopting the draft wildfire preparedness, prevention and mitigation, emergency, response and recovery plans in Attachment A

(for electrical corporations) and Attachment B (for gas corporations). This response date was later extended to December 12, 2025.

3. Ameren Missouri appreciates the Commission's proactive decision to address this important issue with care and study. The Company has also been taking direct action to address this matter in a timely and thoughtful manner. In its *Initial Comments of Ameren Missouri*, the Company mentioned that it had an existing Wildlife Mitigation Plan, but that it was working towards developing and refining mitigation plans as the risk evolves. At that time Ameren Missouri was in the process of retaining, and has since retained, a specialized third-party contractor – EDM International, Inc. ("EDM") – to assist it in the examination of its service territory and its infrastructure in order to develop a more robust and right-sized wildfire mitigation plan. EDM is headquartered in Fort Collins, Colorado, and provides utility engineering and infrastructure services, including the development of wildfire prevention and protection programs. Ameren Missouri's engagement with EDM encompasses three phases along the following general timeline:

- The first phase involves a landscape risk assessment that is set to conclude in January 2026.
- The second phase is a grid assessment, which will conclude in March 2026.
- The third phase will be the final development and implementation of a fulsome wildfire mitigation plan based on the examinations and studies conducted during the first two phases.

For these reasons, Ameren is providing high-level comments in Attachments A and B to these *Additional Comments*, and will be able to supplement these Comments with more complete responses as its engagement with EDM progresses.

**WHEREFORE**, Ameren Missouri asks the Commission to consider its responses provided in the attachments to this pleading.

Respectfully submitted,

/s/ Paula N. Johnson

**Paula N. Johnson, #68963**

Senior Corporate Counsel

**Wendy K. Tatro, # 60261**

Director and Assistant General Counsel

Ameren Missouri

1901 Chouteau Avenue

St. Louis, MO 63103

(314) 861-3220 (phone)

(314) 554-4014 (fax)

[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

for Union Electric Company

d/b/a Ameren Missouri

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all counsel of record this 12<sup>th</sup> day of December, 2025:

General Counsel Office  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office Of the Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102-2230  
[opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)

*/s/ Paula N. Johnson*  
Paula N. Johnson