

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

Ameren Missouri's Report and Corrective Action )  
Plan Per and Request for Variances from the )  
Commission's Vegetation Management Rule ) File No. EE-2026-\_\_\_\_  
20 CSR 4240-23.030, Notice of Case Filing, and )  
Request for Waiver of 60-Day Notice Requirement. )

**AMEREN MISSOURI'S REPORT AND CORRECTIVE ACTION PLAN PER, AND  
REQUEST FOR FUTURE VARIANCES FROM CERTAIN PORTIONS OF, THE  
COMMISSION'S VEGETATION MANAGEMENT RULE 20 CSR 4240-23.030, NOTICE  
OF CASE FILING, AND REQUEST FOR WAIVER OF 60-DAY NOTICE  
REQUIREMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and for its *Report and Corrective Action Plan Per, and Request for Future Variances from Certain Portions of, the Missouri Public Service Commission's Vegetation Management Rule 20 CSR 4240-23.030, Notice of Case Filing, and Request for Waiver of the 60-Day Notice Requirement* states as follows:

1. Union Electric Company is a Missouri corporation, doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri 63103. The Applicant is engaged in providing electric and natural gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). Ameren Missouri is an “electrical corporation” and a “public utility” as defined in subsections 386.020(15) and (43), RSMo. (2016).

**Report Per 20 CSR 4240-23.030(6)D**

2. Commission Rule 20 CSR 4240-23.030 sets out the Electrical Corporation Vegetation Management Standards and Reporting Requirements (hereinafter referred to as the "Vegetation Management Rule") with which Ameren Missouri is required to comply.

3. Pursuant to subsection (6)C of the Vegetation Management Rule, Ameren Missouri compiles and submits a report annually by April 1<sup>st</sup> of each year (unless a variance from that deadline is sought/granted) explaining the vegetation management conducted during the past calendar year and vegetation management planned for the following year.

4. Subsection (6)D of the Commission's Vegetation Management Rule states: "Each electrical corporation shall report its own violations of this rule to the commission within thirty (30) days of discovery and include its plan for correcting the violation."

5. In calendar year 2025, industry-wide vendor workforce shortages were becoming acute, with an average shortage of approximately 80 crew members every day not being available to complete work.<sup>1</sup> In Ameren Missouri's quarterly meetings with vegetation management vendors, the Company regularly discussed workforce recruitment and retention issues.

6. The Company increased its spend for overall vegetation management work during 2025, but the workforce limitations still prevented full completion of required miles. Throughout 2025, the Company released firm bid packages to try to bring non-local workforce into the area to complete vegetation management work, \*\*

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7. As the Company began to compile its 2025 annual vegetation management report, which is due by April 1, 2026, the Company identified two violations of the Vegetation Management Rule:

- a. The Company completed approximately 60% of the required vegetation management on distribution lines in urban areas and approximately 89% of the required vegetation management on distribution lines in rural areas required

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<sup>1</sup> Shortage numbers are inclusive of normal workforce absences (e.g., vacations and illness) as well as unfilled staffing needs by vendors.

under subsection (9)(A)5 of the Rule.<sup>2</sup> Specifically, in calendar year 2025, the Company was required to conduct vegetation management on 1,863 miles of urban distribution lines and 3,012 miles of rural distribution lines. Due to lack of vendor workforce, the Company completed vegetation management on 1,124 miles of urban distribution lines and 2,685 miles of rural distribution lines.

- b. Correspondingly, the Company did not maintain the required minimum clearances of vegetation from distribution line conductors in urban and rural areas under subsection (9)B of the Rule.

8. The Company acknowledges these violations and is committed to correcting them as set out in the plan below.

**Corrective Action Plan Per 20 CSR 4240-23.030(6)D**

9. In order to cost-effectively resolve the violations, the Company has developed the following Corrective Action Plan:

- a. Ameren Missouri will cure the 2025 “missed” urban and rural miles under the two violations in calendar year 2026. However, due to continuing workforce limitations, a portion of the vegetation management work due in 2026 on both urban and rural distribution lines will need to shift to be completed in 2027. The 2026 “backlog” of rural distribution lines will be resolved in 2027.
- b. But a smaller portion of the vegetation management work due in 2027 on urban distribution lines will need to shift to be completed in 2028. The 2027 “backlog” of urban distribution lines will then be resolved in 2028.

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<sup>2</sup> The terms "vegetation management," "distribution line," "urban," and "rural" are defined in the Vegetation Management Rule at subsections 1(L), 1(C), 1(J), and 1(G), respectively.

c. Below is a table showing the shift of work across years 2026 – 2028.

| URBAN DISTRIBUTION MILES                  | Trim Year |       |       |       |
|---|-----------|-------|-------|-------|
|   | 2026      | 2027  | 2028  | 2029  |
| 2025 Urban Miles                          | 739       |       |       |       |
| 2026 Urban Miles                          | 1,124     | 739   |       |       |
| 2027 Urban Miles                          |           | 1,494 | 369   |       |
| 2028 Urban Miles                          |           |       | 1,863 |       |
| <b>TOTAL</b>                              | 1,863     | 2,233 | 2,232 | 1,863 |
| Percent of planned annual miles completed | 60%       | 67%   | 100%  | 100%  |
| Percent of annual miles-variance          | 40%       | 33%   | 0%    | 0%    |

| RURAL DISTRIBUTION MILES                               | Trim Year |       |       |       |
|--|-----------|-------|-------|-------|
|  | 2026      | 2027  | 2028  | 2029  |
| 2025 Rural Miles                                       | 327       |       |       |       |
| 2026 Rural Miles                                       | 2,685     | 327   |       |       |
| 2027 Rural Miles                                       |           | 3,012 |       |       |
| 2028 Rural Miles                                       |           |       | 3,012 | 3,012 |
| <b>TOTAL</b>   | 3,012     | 3,339 | 3,012 | 3,012 |
| Percent of planned current-year annual miles completed | 89%       | 100%  | 100%  | 100%  |
| Percent of annual miles-variance                       | 11%       | 0%    | 0%    | 0%    |

d. The Company will also continue to explore how the Company and the industry can address vegetation management workforce issues; workforce issues will continue to be discussed at all the Company's upcoming quarterly meetings with vegetation management vendors.

10. Under the Corrective Action Plan, clearing the 2025 "backlog" will cause cascading shifts of urban and rural distribution vegetation management work into future calendar years, which jeopardizes compliance with subsections (9)(A)5 and (9)B of the Vegetation Management Rule in those future calendar years of 2026 and 2027.

**Variations Requested Under 20 CSR 4240-20.030(11)**

11. In order to complete the Corrective Action Plan described above and not cause cascading violations in the calendar years of 2026 and 2027, the Company requests the following variances:

- a. Variations from 20 CSR 4240-23.030(9)(A)5 for calendar years 2026 and 2027 so that only approximately 60% and 67%, respectively, of the required vegetation management must be completed on urban distribution miles as the backlog from prior calendar years' miles is also completed. In other words, the Company would complete total miles equal to its annual requirement in each of the years of 2026 and 2027, but because some of those miles were curing the shortages from the prior year, a cumulative mileage shortfall associated with the 2025-2027 period would exist through 2027. The variations would allow approximately 40% and 33% of miles that should have been scheduled in 2026 and 2027 to be deferred to the following respective years.
- b. Variance from 20 CSR 4240-23.030(9)(A)5 for calendar year 2026 so that only approximately 89% of the required vegetation management must be completed on rural distribution miles as the backlog of the 2025 rural miles is also completed. In other words, the Company would complete total miles equal to its annual requirement for rural distribution miles in 2026, but because some of those miles were curing the shortages from the prior year, a cumulative mileage shortfall associated with the 2025-2026 period would exist through 2026. The variations would allow approximately 11% of 2026 rural miles to be deferred to 2027.

- c. Corresponding variances from 20 CSR 4240-23.030(9)B for calendar years 2026 and 2027 so that only 60% and 67%, respectively, of the required clearance work must be completed on urban distribution miles as the backlog from each prior calendar year's miles is also completed.
- d. Corresponding variance from 20 CSR 4240-23.030(9)B for calendar year 2026 so that only 89% of the required clearance work must be completed on rural distribution miles as the backlog from 2025's miles is also completed.

12. Subsection (11) of the Vegetation Management Rule allows as follows: "A variance from a provision of this rule may be granted only for good cause shown."

13. Good cause exists for the requested variances because the contractor workforce limitations that persist are beyond Ameren Missouri's control. And, the Company's Corrective Action Plan aggressively cures the 2025 violations and supports the shifting of required vegetation management and clearance work for only as long as required to clear shifting work backlogs and meet then-current year requirements.

**Notice of Case Filing & Request for Waiver of 60-Day Notice Requirement**

14. Ameren Missouri requests a variance from the 60-day notice requirement of 20 CSR 4240-4.017, which states, in relevant part:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case...

15. Under 20 CSR 4240-4.017(1)D, waivers of the 60-day notice requirement may be granted for good cause shown. Good cause may include providing a verified statement that no communications have occurred with the office of the commission within the preceding 150 days regarding a substantive issue likely to be in the case, or that circumstances prevented filing the required notice and that requiring the notice would cause harm.

16. Good cause exists for this requested waiver. As explained above, the violations were only recently identified as the Company began compiling its 2025 annual vegetation management report, which is due by April 1, 2026. Moreover, requiring a 60-day notice in advance of this filing would necessarily exceed the 30-day reporting of violations deadline set out in subsection (6)D of the Vegetation Management Rule.

17. No other public utility will be affected by granting the Company a waiver from this requirement.

WHEREFORE, Ameren Missouri requests the Commission accept the Company's Report and Corrective Action Plan, approve the Company's request for future variances from certain portions of the Commission's Vegetation Management Rule, accept notice of this case filing, and approve the Company's request for waiver of the 60-day notice requirement as set forth above.

Respectfully submitted,

*/s/ Jermaine Grubbs*

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**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 13th day of March, 2026.

*/s/ Jermaine Grubbs*  
Jermaine Grubbs