

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, File No. EE-2026-0234
Application of Union Electric Company d/b/a/ Ameren Missouri for Variances from the Commission's Vegetation Management Rule 20 CSR 4240-23.030, Notice of Case Filing, and Request for Waiver of 60-Day Notice Requirement

FROM: Donald A. Fontana, PE, Industry Analysis Division

/s/ Donald A. Fontana, PE / 04-08-2026

SUBJECT: Staff Report and Conclusion on Ameren Missouri's 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

DATE: April 09, 2026

SUMMARY

On March 13, 2026, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri")¹ filed 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*. Following the procedure detailed in 20 CSR 4240-20.030(11), Ameren Missouri has requested variances to the vegetation management requirements of the rule and has submitted a detailed corrective action plan in its filing. Based on its review, Staff recommends the Commission grant Ameren Missouri's requested variances to 20 CSR 4240-23.030(9)(A)5 for calendar years 2026 and 2027 as relates to vegetation management in urban areas; 20 CSR 4240-23.030(9)(A)5 for calendar year 2026 as relates to vegetation management in rural areas; 20 CSR 4240-23.030(9)B for calendar years 2026 and 2027 as relates to vegetation management in urban areas; and 20

¹ Ameren Missouri is a corporation organized under the laws of Missouri with its principal office at 1901 Chouteau Avenue, St. Louis, Missouri 63103. Ameren Missouri is duly authorized to do business in Missouri. In File No. EA-2023-0226, Ameren Missouri previously submitted to the Commission a certified copy of its Articles of Incorporation (File No. EA-87-105) and a Certificate of Good Standing from the Missouri Secretary of State (File No. EF-2023-0151).

CSR 4240-23.030(9)B for calendar year 2026 as relates to vegetation management in rural areas. Additionally, Staff recommends the Commission grant Ameren Missouri a variance from the 60-day notice requirement of 20 CSR 4240-4.017.

OVERVIEW

Commission Rule 20 CSR 4240-23.030 details conditions of the Electrical Corporation Vegetation Management Standards and Reporting Requirements applicable to Independently Owned (Electric) Utilities (“IOUs”). Subsection (6)C of the Vegetation Management Rule requires IOUs to submit an annual report of activities by April 1 of each year, that describes all vegetation management activities which were done in the reporting year and to provide a description of vegetation management planned for the upcoming year. Subsection (6)D of the rule requires that "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." In this case, Ameren Missouri discovered two violations to the rule while preparing its 2025 Vegetation Management Report to the Commission and are requesting variances to 20 CSR 4240-23.030(9)(A)5, and to 20 CSR 4240-23.030(9)B for a period of two calendar years, as Ameren Missouri works to regain compliance with the rule requirements².

Ameren Missouri’s corrective action plan proposes the course of action it believes will best correct the violations in a cost-effective manner. Concurrently with the notice of violation and corrective action plan submittal, Ameren Missouri also seeks a waiver from the 60-day notice requirement of 20 CSR 4240-4.017. This rule states “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...”. 20 CSR 4240-4.017(1)D asserts that waivers of the 60-day notice requirement may be granted for good cause shown. Paragraph 16 on page 7 of Ameren Missouri’s filing explains that good cause exists for a waiver of the 60-day notice requirement. Ameren Missouri’s justification is that the 60-day time frame exceeds the 30-day reporting requirement of violations detailed in 20 CSR 4240-23.030(6)D of the Vegetation Management Rule.

² Paragraph 11, Pages 5 and 6 of EE-2026-0234 26 03 13 Veg Mgmt Report_Plan_Variance Request - CONF

Ameren Missouri’s corrective action plan proposes adding trimming for missed mileage to its currently scheduled urban and rural distribution system’s vegetation trimming mileages in future vegetation management seasons. The following table from Paragraph 9 on Page 4 of the Report, Corrective Action Plan, and Request for Variance filing shows both types of electric distribution systems (urban and rural) and lists the amount of additional trimming per year and per system that is being presented in the corrective action plan to bring Ameren Missouri into compliance cost-effectively, and without getting further behind on mileage.

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	
TOTAL	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
TOTAL	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%

Other tools to assist corrective measures that are being considered by Ameren Missouri include:³

- Development of a more comprehensive dashboard to track vendor work progress to assist in identifying potential issues sooner.

³ DR No. 0003 and DR No. 0006

- Review of the communication loop to assist in providing earlier detection of potential violations.
- Ameren Missouri will also be proactively piloting LiDAR technology to enhance planning, prioritization, and contracting strategies with their vendors.

Discussion

Commission Rule 20 CSR 4240-23.030(6)D requires that an electrical corporation report its own violations of the Vegetation Management Rule within thirty days of discovery, and that it should include a corrective action plan. As Ameren Missouri assembled its 2025 Annual Report, it discovered two violations to the Vegetation Management Rule which occurred in 2025. Ameren Missouri reported the violations in accordance with 20 CSR 4240-23.030(6)D and provided a corrective action plan. Ameren Missouri experienced an industry-wide vendor workforce shortage in calendar year 2025. ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **

As Ameren Missouri started compiling its 2025 vegetation management report, it became obvious that it was in violation of the Commission’s vegetation management rule in two instances. Due to the diminished vendor workforce, Ameren Missouri’s vendors performed 60% of the required vegetation management for urban distribution lines, and its vendors performed 89% of the required vegetation management on rural distribution lines. In terms of 2025 trimming mileage, vegetation management was completed on 1,124 miles of urban distribution lines, but the requirement was for 1,863 miles to be maintained. Similarly, in 2025, rural distribution line vegetation management was completed on 2,685 miles of line, but the requirement was for 3,012 miles to be maintained. Ameren Missouri acknowledges the violations and has committed to correcting them in the most cost-effective way it can. Additionally, Ameren Missouri has taken steps to improve its vendor oversight and improve communication about the status of mileage required and attained.

⁴ Page 2, Paragraphs 5 and 6 of EE-2026-0234 03 13 Veg Mgmt Report_Plan_Variance Request - CONF

Ameren Missouri believes these steps will enable it to maintain compliance in future seasons and reduce the likelihood of having to request a future variance for this type of violation.

RECOMMENDATION

Based on its review, Staff recommends the Commission grant the requested variances to 20 CSR 4240-23.030(9)(A)5 and 20 CSR 4240-23.030(9)B for two years as requested.

Staff also recommends the Commission grant a waiver from the 60-day notice requirement of 20 CSR 4240-4.017.

