

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

In the Matter of Union Electric Company d/b/a	)	
AmerenUE and a filing of a Compliance Plan	)	
Concerning Vegetation Management Standards	)	Case No. EO-2009-0012
Pursuant to Missouri Public Service	)	
Commission Rule 4 CSR 240.030.	)	

**NOTICE OF MODIFICATION**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and, pursuant to 20 CFR 4240-23.030(4)(C), states to the Missouri Public Service Commission (“Commission”) as follows:

1. On July 1, 2008, Ameren Missouri filed a Notice of Compliance, which included a copy of its vegetation management standards, guidelines and procedures, as was required by 4 CSR 240-23.030(4)(C) (now 20 CFR 4240-23.030(4)(C)).

2. Ameren Missouri has determined it will make a change in its vegetation management standards, guidelines and procedures, as set forth below.

3. As required by regulation, Ameren Missouri is filing this change 30 days prior to implementation of the change.

4. Attached to this pleading is an affidavit of Mark Birk, who is an officer with knowledge of the matters stated therein.

5. The change to be made is as follows:

- a. 20 CSR 4240-23.030(9)(A)(5) requires vegetation management to be performed "on no less than twenty-five percent (25%) of [the utility's] total urban distribution miles each year, and on no less than twenty-five percent

(25%) of [the utility's] total rural distribution miles each eighteen (18) months."

- b. The AmerenUE [a/k/a Ameren Missouri] Vegetation Management Program and Practices, states, under General Practices, Part 3: "12.47, 4.16, 7.2 and 2.4kV - AmerenUE service areas shall be trimmed on a 4 or 6 year cycle depending upon the classification of the feeder as either urban or rural."
- c. Ameren Missouri is modifying the above-cited sentence to state: "12.47, 4.16, 7.2 and 2.4kV - Ameren Missouri service areas shall be trimmed on no less than twenty-five percent (25%) of the total urban distribution miles each year, and on no less than twenty-five percent (25%) of the total rural distribution miles each eighteen (18) months."

6. Ameren Missouri believes this version more closely matches the regulatory requirements than does the existing language and it is more effective for Ameren Missouri customers. For example, under the original approach, one urban circuit could be on its fourth year and therefore on the schedule to be trimmed even though it may have little or no issues with vegetation. Another urban circuit might be only on its third year and not yet on the schedule or under consideration for trimming that year even though it might have a greater issue with vegetation that could negatively impact customer reliability. This change implements the additional step to examine circuit performance for customers when selecting the mileage to be trimmed each year.

7. Ameren Missouri ask Missouri Public Service Commission accept this Notice. The regulations require no further action by the Commission.

**WHEREAS.** Ameren Missouri asks the Missouri Public Service Commission to accept this Notice of Modification to its original vegetation management standards, guidelines and procedures

Respectfully submitted,

UNION ELECTRIC COMPANY  
D/B/A AMEREN MISSOURI

/s/ Wendy K. Tatro

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 4<sup>th</sup> day of December, 2019.

/s/ Wendy K. Tatro

Wendy K. Tatro

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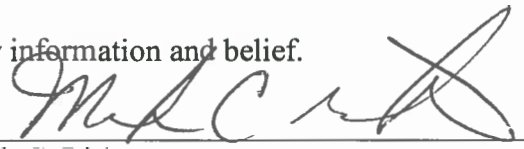
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**AFFIDAVIT OF MARK C. BIRK**

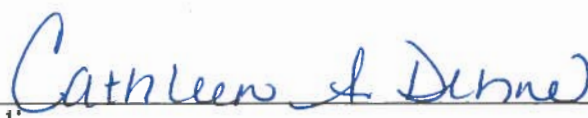
**STATE OF MISSOURI** )  
 ) ss  
**CITY OF ST. LOUIS** )

Mark C. Birk, being first duly sworn on his oath, states:

1. My name is Mark C. Birk. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a Ameren Missouri as Senior Vice President, Customer and Power Operations.
2. Neither Ameren Missouri nor any person on its behalf has had any communications with the office of the Commission regarding any substantive issue likely to be an issue in the case initiated by this filing during the preceding 150 days.
3. I hereby swear and affirm that the information contained herein and in the Notice of Modification is true and correct to the best of my information and belief.

  
\_\_\_\_\_  
Mark C. Birk

Subscribed and sworn to before me this 2<sup>nd</sup> day of December, 2019.

  
\_\_\_\_\_  
Notary Public

My commission expires:

March 7, 2021

