

5. It is Ameren Missouri's position that its Circuit Device Inspection Program ("CDIS") program has matured to the point where the inspection cycles should be adjusted.

6. These rules were first implemented in 2007. Since that time, Ameren Missouri has completed multiple rounds of inspections, allowing the Company to identify its degraded infrastructure and to either repair or replace those portions of its system. We will continue to do so as the system ages.

7. Because of this past history with these inspections, Ameren Missouri expects no noticeable impact to system reliability by implementing the recommended inspection changes detailed below.

8. Current inspections of Ameren Missouri's distribution system reveal low levels of degraded or damaged equipment. These findings give the Company confidence that its equipment is in good condition and that it is not in need of a high level of repair outside of the regular maintenance schedule. Further, Ameren Missouri believes its Smart Energy Plan investments will result in additional improvement to the reliability of the system, especially with the addition of distributed automation, circuit upgrades, and other improvements that enhance the reliability of the entire system.

9. Even with this variance request, Ameren Missouri would be operating in a manner that is more conservative than the inspection recommendations of other agencies such as the American Wood Protection Association (AWPA) and the US Department of Agriculture Rural Utility Service (RUS). Specific variance requests are set forth below and also summarized in the table labeled Exhibit 1. Note, this table is a replica of the table in the Commission's rules with the requested variances shown in red font.

10. Ameren Missouri anticipates meaningful cost savings, estimated to be approximately \$500,000 to \$700,000 annually in operating expenses as a result of reducing what are now duplicative inspections.

II. Manholes and vaults request for detailed inspections every six years for urban and twelve years for rural and removal of the obligation to conduct visual inspection

11. Under the existing rules, Ameren Missouri manholes and vaults are receiving a visual inspection every 4 (urban) or 6 (rural) years. Detailed inspections are required every 8 (urban) or 12 (rural) years. Accordingly, all Ameren Missouri manholes and vaults have been inspected twice since the inception of the CDIS program in 2007.

12. Currently, Ameren Missouri inspects all Manhole Vaults on the urban cycle. When a visual inspection resulted in a finding, Ameren Missouri then performs an engineering (detailed) review. Any findings as a result of the detailed inspection are then repaired or replaced. While initial inspections initially found areas to be addressed, now that the cycle has been repeated multiple times, the number of concerns identified during visual inspections has decreased to the point that the detailed inspections alone are sufficient to maintain Ameren Missouri's high reliability.

13. For these reasons, Ameren Missouri recommends removing the visual inspection requirement and performing only the detailed inspections at a modified cycle of every 6 years for all Ameren Missouri manholes and vaults.

III. Underground Residential Distribution inspections from a four or eight-year cycle to a six or twelve-year cycle

14. The current regulations require that Underground Residential Distribution ("URD") equipment undergo a visual inspection every four (urban) or six (rural) years and a more detailed inspection every eight (urban) or twelve (rural) years. Accordingly, this equipment has been inspected two to three times since the inception of the URD CDIS program in 2009.

15. Currently, Ameren Missouri has inspected all URD assets on the urban cycle. Previous inspections have already identified higher risk and degraded equipment which has already either been repaired or replaced. As such, the findings identified during recent visual inspections have decreased to the point that the inspection cycle can be revised to 6 years for visual and 12 years for detailed inspections while maintaining Ameren Missouri's high reliability,

16. Ameren Missouri is requesting a variance to allow standardized visual inspections every six years (for both urban and rural) and detailed inspections every twelve years (for urban and rural) on Ameren Missouri's URD system.

IV. Urban and rural visual inspection of wood poles every six years

17. The Commission regulations require inspections of urban poles every four years and rural poles every six years. Ameren Missouri owns approximately 800,000 utility poles on the distribution system, and, at this time, those poles have now been inspected multiple times under the current regulations.

18. Ameren Missouri submits that the more frequent inspection of poles in our urban areas offers no significant benefit to that portion of the system as compared to those inspected as part of the rural cycle. The Company proposes a variance that will align the inspections in our urban areas with those in our rural areas.

19. As proposed visual inspection cycles re-align, Ameren Missouri expects we could experience no more than 0.5% more pole rejects scaled linearly due to poles having two additional years between inspection cycles. Note that pole rejections do not reflect a pole failure or outage but rather are an indicator used to identify potential issues. Accordingly, an increase in pole rejects does not equate to a decrease in reliability.

20. Ameren Missouri's proposal aligns overhead distribution utility pole inspections with the recommendations of the American Wood Protection Association and the US Department

of Agriculture Rural Utility Service for having one standard inspection frequency for all poles in general.

21. Given these facts, Ameren Missouri believes these recommended changes will not have a substantial impact to system reliability and so the Company's requested change to extend the urban overhead visual inspections to every six years is one that should be approved by the Commission.

REQUEST FOR VARIANCE FROM 60-DAY NOTICE REQUIREMENT

22. 20 CSR 4240-4.017(1) requires a 60-day notice in advance of filing a case, with a “case” being defined as “Any matter filed before the commission for its determination except working dockets, rulemaking dockets, and investigatory dockets.” 20 CSR 4240-4.015(1).

23. The 60-day notice requirement can be waived for good cause shown and the rule itself establishes that good cause in fact exists if the party seeking the waiver files “a verified declaration . . . that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue¹ likely to be in the case . . .” A verified declaration meeting those requirements is attached to this Application. Consequently, good cause has been established.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission grant it a variance from the provisions of 20 CSR 4240-23.020 for the 2021 compliance year and for future compliance years and requests that the Commission waive the 60-day notice requirement of 20 CSR 4240-4.017(1) for good cause shown, as set forth above.

Respectfully submitted,

Banks Law LLC

/s/ Eric Kendall Banks

¹ The phrase “substantive issue” is defined by 20 CSR 4240-4.015(14).

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d/b/a Ameren Missouri**

CERTIFICATE OF SERVICE

I hereby certify that on November ____, 2022, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record. A copy has also been emailed to them by the undersigned.

/s/ Eric Kendall Banks

VERIFIED DECLARATION

I hereby declare that neither Ameren Missouri nor any other person on its behalf has had a communication with the office of the Commission regarding any substantive issue likely to be in the case created by this filing within the 150-day period prior to this filing.

Under penalty of perjury, I declare that the foregoing declaration is true and correct to the best of my knowledge and belief.

/s/ Warren Wood _____
Warren Wood, Vice-President
Regulatory and Legislative Affairs

Proposed - Electrical Corporation System Inspection Cycles							
(Maximum Interval in Years)							
	Patrol		Detailed		Intrusive		Notes
	Urban	Rural	Urban	Rural	Urban	Rural	
Poles/Overhead Structures							
Wood	6	6	---	---	12	12	Note 1
Non-Wood	6	6	12	12	---	---	Note 2
Conductors, Transformers, Reclosers, Regulators, Capacitors, Switching/Protective Devices, and Streetlighting							
Overhead	6	6	12	12	---	---	
Overhead (with real-time remote monitoring)	---	---	12	12	---	---	
Underground-direct buried and conduit	6	6	12	12	---	---	Note 3
Underground-direct buried and conduit (with real-time remote monitoring)	---	---	12	12	---	---	Note 3
Underground Networks	4	---	8	---	---	---	
Underground Networks (with real-time remote monitoring)	---	---	12	---	---	---	
Manholes, vaults, tunnels, and Other underground structures	0	0	6	12	---	---	
Note 1: No intrusive inspection required for first 12 years after installation, however, intrusive inspection required between years 12 and 18. For poles/structures greater than 12 years of age at inception of program, intrusive inspections must be completed within 12 years							
Note 2: No detailed inspection required for first 12 years after installation, however, detailed inspection required between years 12 and 18. For poles/structures great than 12 years of age at inception of program, detailed inspections must be completed within 12 years.							
Note 3: Some components of underground-direct buried and conduit distribution systems are above ground (e.g., pad-mounted transformers, pad-mounted switches, pad-mounted, reclosers, etc.) The inspection intervals also apply to these above ground devices. These inspection requirements do not apply to direct-buried cable or cable installed in underground conduit							