

COMMENTS ON PROPOSED MITIGATION PLAN COMPONENTS BY AMEREN MISSOURI'S GAS OPERATIONS

I. Wildfire Emergency Preparation and Response Procedures

1. Define system isolation zones to which the flow of gas can be isolated.
 - a. Identify priority customers (e.g. medically vulnerable or critical infrastructure) within each system isolation zone.
 - b. Determine which valves will need to be operated to isolate each zone, and develop and implement a procedure for inspecting and maintaining the operability and accessibility of these valves.
 - c. Establish manual shut-in sequence for each isolation area (consideration should be given to potential loss of cellular communication and electrical utilities in wildfire affected areas).

The Missouri Public Service Commission's ("Commission") Gas Safety Rules - specifically 20 CSR 4240-40.030 Section 13 (V), Valve Maintenance – Distribution Systems – address isolation zones. This regulation stipulates the development and maintenance of emergency valve isolation zones, enabling operators to respond effectively to any emergency situation. Establishing separate requirements for wildfire zones could introduce redundancy and may conflict with the existing protocols.

2. Determine what sources of information are needed for advance warning of wildfire, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)

Ameren Missouri currently works with the National Weather Service ("NWS") to receive elevated fire weather risk notifications (including Red Flag Warnings) and monitors alerts from six NWS offices to ensure full coverage of our service territory. We are evaluating the availability of additional tools and resources that would allow us to assess and monitor wildfire risk at a more granular level, ensuring functionality aligns with the risk level of the territory, affordability and operational needs.

3. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area. Consideration should be given to loss of cellular and electrical services in wildfire affected areas.

In the event of a wildfire, Ameren Missouri will leverage existing emergency plans already in place in compliance with 20 CSR 4240-40.030 Section 12 (J) - Emergency Plans.

4. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.

In the event of a wildfire, Ameren Missouri will leverage existing emergency plans already in place in compliance with 20 CSR 4240-40.030 Section 12 (J) - Emergency Plans.

5. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).

Ameren Missouri is working with a specialized third party, EDM International, Inc. ("EDM"), to assess the landscape risk of wildfire to our service territory. Using this information, we will develop an enhanced wildfire mitigation plan in line with industry best practices appropriate for the risk level of our service territory.

6. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.

Ameren Missouri is working with EDM to assess the landscape risk of wildfire to our service territory. Using this information, we will develop an enhanced wildfire mitigation plan in line with industry best practices appropriate for the risk level of our service territory.

7. Evaluate what actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.

Ameren Missouri is working with EDM to help us enhance our current wildfire mitigation plans. Through this engagement, we will assess the need for customer action in response to a wildfire threat and establish procedures for communicating these, if necessary.

8. Identify personnel needed within the company and externally to implement each action.
 - a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.
 - b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.
 - c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.

Ameren Missouri is working with EDM to enhance our wildfire mitigation plan. Through this engagement, we will develop a wildfire-specific chain of command and build on existing emergency protocols to create an enhanced plan in line with industry best practices appropriate for the risk level of our service territory. Mutual assistance agreements are in place and would be leveraged in the event of a wildfire, if necessary.

II. Wildfire Restoration Procedures

1. Coordinate with appropriate local public emergency agencies and officials prior to intentional purging, venting or flaring natural gas in the immediate aftermath of wildfire.

The response and restoration processes following a wildfire align with those established for other natural disasters and major outages as described in existing regulations, including 20 CSR 4240-40.030 Section 12 (J) - Emergency Plans. We would recommend that gas utilities address restoration from a wildfire through existing procedures for natural disasters. Introducing additional regulations could introduce more opportunities for future conflict.

2. Establish a prioritization matrix for restoration. Consideration should be given to priority customers.

The response and restoration processes following a wildfire align with those established for other natural disasters and major outages as described in existing regulations, including 20 CSR 4240-40.030 Section 12 (J) - Emergency Plans. We would recommend that gas utilities address restoration from a wildfire through existing procedures for natural disasters.

3. Conduct a damage assessment in wildfire affected areas to determine which facilities will need to be inspected and/or tested prior to reintroducing gas, and which will need to be removed and replaced. At a minimum, consideration should be given to:
 - a. Regulator station piping, internal components, supports, insulation, enclosures, monitoring, control, and communication equipment,
 - b. Customer meters, service regulators, relief valves, and anodeless risers,
 - c. Cathodic protection test stations, rectifiers, and electrical panels,
 - d. Sensing, control and communications equipment, gauges, and pressure recording devices, and
 - e. Shallow buried plastic pipelines, anodeless risers, and encased plastic pipelines on bridges or at aboveground terminations.

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4. Prepare a schedule for testing/replacement of heat affected equipment, components and parts.

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