

Illinois Commerce Commission
Assessment of AmerenIP's
Reliability Report and Reliability Performance
for Calendar Year 2007

Pursuant to 83 Illinois Administrative Code 411.140

July, 2008

1. Executive Summary

Pursuant to Section 16-125 of the Illinois Public Utilities Act and the Commission's electric reliability rules in 83 Illinois Administrative Code, Part 411, Illinois Power Company d/b/a AmerenIP (AmerenIP) filed its annual electric reliability report for calendar year 2007 on May 29, 2008. This document details Staff's assessment of AmerenIP's 2007 reliability report and Staff's evaluation of AmerenIP's reliability performance for calendar year 2007.

AmerenIP's reported company-wide System Average Interruption Frequency Index (SAIFI) performance in 2007 (1.38) was 45% better than it reported for 2006, and it was the second best of all the reporting Illinois utilities. AmerenIP's worst circuit SAIFI in 2007 was nearly 30% better than it reported for 2006, the third best of the six reporting utilities, and just over half of the value reported by ComEd.

At 346 minutes (5.77 hours), AmerenIP's reported 2007 company-wide Customer Average Interruption Duration Index (CAIDI) performance was more than a 77% improvement from that reported for 2006, but was still the highest in the six-utility reporting group. AmerenIP's 2007 worst circuit CAIDI improved 34% from the 2006 value, and was third best among the six utilities. The severe July wind storms and the November/December ice storm were major contributors to AmerenIP's SAIFI and CAIDI statistics in 2006. Similar widespread storms did not occur in AmerenIP's service territory in 2007.

AmerenIP listed overhead equipment problems as the most predominant cause of customer interruptions in 2007, causing 21.74% of its total customer interruptions, while 16.70% of the customer interruptions were attributed to weather. AmerenIP reported that it has adopted a more analytical approach in attributing interruptions to the proper cause, rather than using "weather" as a catchall category in many cases. This is a significant improvement.

Forestry problems were listed as the cause for 5.11% of the customer interruptions in 2007. Staff has found tree trimming to be very well done, overall, in communities served by AmerenIP and on the circuits inspected in 2007 and 2008, but there were several exceptions. Tree trimming in Jacksonville, for example, has continued to be a perennial problem. In addition to maintaining a four-year trim cycle, as AmerenIP has committed to do, it also needs to assure compliance with 2002 NESC Rule 218 by assuring that all trees near its lines throughout its service territory are trimmed such that there will be no tree contacts with its energized primary¹ conductors before it returns to trim them again.

Staff noted violations of the National Electrical Safety Code at seventy-one (71) locations on AmerenIP electric circuits this year. This total includes a token number of guying violations, but Staff made no effort to look for many of this type of violation, of which thousands are known to exist on AmerenIP's electric system. (See Section 7E for more

¹ The term "primary", as used in this report in relation to electrical facilities, refers to a circuit with a nominal voltage of 2,400 volts or more.

details). All of the safety code violations pose a threat to public safety and many of them threaten service reliability as well.

Staff and Ameren worked together to develop Ameren's NESC Corrective Action Plan dated October 31, 2007. In this action plan, Ameren has committed that its normal ongoing process for resolution of all NESC violations will be for it to correct the violations that pose an imminent danger to public or employee safety within 24 hours and all others within 90 days of its becoming aware of them. The exception to Ameren's normal ongoing process, due to the huge volume of NESC violations known and estimated to already exist in Ameren's electric system, is that a one-time "catch up" program will be allowed for certain violations thought not to be as time critical as most others. This "catch up" program will apply only to downguys or overhead guys that are not properly grounded or insulated, but are fully intact, in good condition, and not expected to fail during the next 5 years. The "catch up" program will allow 12 months from time of discovery for Ameren to resolve these specific cases. This one-time "catch up" program will cease on December 31, 2011, after which time the resolution of all NESC violations will fall under Ameren's normal ongoing process described earlier. Ameren issued Addendum 1 to the October 31, 2007, NESC Corrective Action Plan on April 11, 2008. In that addendum, Ameren agreed to correct all guying violations that were found in 2007 by December 31, 2008, and to correct all other NESC violations found in 2007 by June 11, 2008. Ameren also agreed to correct all previously grandfathered AmerenIP interstate highway crossing NESC violations by December 31, 2008.

Staff found fewer structural problems than normal during its inspections of AmerenIP circuits again this year, and many new poles and crossarms. Staff noted needs for more lightning arresters, more animal guards, and attention to several other problems on some of AmerenIP's worst performing and other circuits inspected this year. Many of these problems, while not necessarily causes of poor performance in 2007, will have adverse effects on reliability and public safety in the future if not corrected. (Photos of some of the structural problems found are included in this report, and summaries of problems noted by Staff on AmerenIP circuits inspected this year are included as Attachments "A" through "R"). AmerenIP should perform field inspections of all circuits on a regular basis and correct the problems found which can significantly affect reliability or public safety.

AmerenIP listed several ongoing corporate, operating, and maintenance activities that the company is doing to improve reliability, summarized in Section 9 of this report. These are positive steps toward reliability improvement.

AmerenIP reported that all remedial work on worst performing circuits described in its 2006 reliability report has been completed.

While the above discussion covers the most significant items in a general way, a total of six specific recommendations are included in this Staff report, summarized in Section 12.

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2. Introduction

Beginning with the year 1999, and at least every three years thereafter, 83 Illinois Administrative Code Part 411.140 requires the Commission to assess the annual reliability report of each jurisdictional entity and evaluate its reliability performance. Code Part 411.140 requires the Commission evaluation to:

- A) Assess the reliability report of each entity.
- B) Assess the jurisdictional entity's historical performance relative to established reliability targets.
- C) Identify trends in the jurisdictional entity's reliability performance.
- D) Evaluate the jurisdictional entity's plan to maintain or improve reliability.
- E) Include specific identification, assessment, and recommendations pertaining to any potential reliability problems and risks that the Commission has identified as a result of its evaluation.
- F) Include a review of the jurisdictional entity's implementation of its plan for the previous reporting period.

This document provides Staff's assessment of the annual reliability report covering calendar year 2007 filed by Illinois Power Company d/b/a AmerenIP (AmerenIP) on May 29, 2008, and Staff's evaluation of AmerenIP's reliability performance for calendar year 2007. This report is organized to include all of the above listed requirements.

3. AmerenIP's 2007 Customer Base and Service Territory

As of December 31, 2007, AmerenIP provided electric service to 622,980 distribution customers in Illinois, of which nearly 89% are residential, 11% are commercial, and less than 1% are industrial. AmerenIP's service territory covers approximately 15,000 square miles and primarily serves rural areas and small towns.

AmerenIP's service territory consists of sixteen geographic areas:

Belleville	Danville	Hillsboro	Maryville
Bloomington	Decatur	Jacksonville	Mt. Vernon
Centralia	Galesburg	Kewanee	River Bend
Champaign	Granite City	LaSalle	Sparta

4. AmerenIP's Electric Distribution System

Approximately 87% of AmerenIP's electric distribution system is overhead, with the remaining 13% being underground. AmerenIP reported that it has a total of 874 electric distribution circuits (as of 12/31/07).

Code Part 411.120(b)(3)(G) requires the utilities to report on the age of their distribution facilities. AmerenIP estimates that the approximate average ages of its distribution equipment range from 11.9 years (for underground conductor and devices) to 24.6 years (for structures and improvements), with an average age of 15.1 years for poles, towers, and fixtures, and 17.9 years for line transformers. AmerenIP estimates the remaining average lives of its distribution equipment to range from 11.1 years (for underground conductor and devices) to 35.4 years (for structures and improvements), with an average remaining life of 15.9 years for poles, towers, and fixtures, and 25.1 years for line transformers. See Table 28 (page 76) in AmerenIP's annual reliability report for more details.

5. Assessment of AmerenIP's 2007 Reliability Report

Illinois Power Company d/b/a AmerenIP (AmerenIP) filed its annual electric reliability report for calendar year 2007 on May 29, 2008, as required by Section 16-125 of the Public Utilities Act and the Commission's electric reliability rules in 83 Illinois Administrative Code, Part 411. AmerenIP's report contains all the information necessary to comply with the requirements of Code Part 411.120(b)(3). The report is generally well organized, with the information sequenced to follow the pattern of Code Part 411.

AmerenIP described several specific projects in its reliability report which are intended to improve system reliability.

6. AmerenIP's Historical Performance Relative to Established Reliability Targets

Code Part 411.140(b)(4)(A-C) establishes electric service reliability targets that jurisdictional entities (utilities) must strive to meet. These targets specify limitations on customer interruptions as well as hours of interruption that a utility must strive not to exceed on a per customer basis. Code Part 411.120(b)(3)(L) requires each utility to provide a list of every customer, identified by a unique number, who experienced interruptions in excess of the service reliability targets, the number of interruptions and interruption duration experienced in each of the three preceding years, and the number of consecutive years in which the customer has experienced interruptions in excess of the service reliability targets.

In April 2004, Illinois Power (now AmerenIP), along with all other regulated Illinois electric utilities, agreed to report on all interruptions (controllable and uncontrollable) as defined in Code Part 411.20 in relation to the service reliability targets for the reporting periods of 2003 through 2007, and to include the specific actions, if any, that the utility plans or has taken to address the customer reliability concerns. In January 2008, the utilities extended this agreement through year 2012.

The customer service reliability targets are listed in Table 1.

Table 1
CUSTOMER SERVICE RELIABILITY TARGETS

Immediate primary source of service operation voltage	Maximum number of interruptions in each of the last three consecutive years	Maximum hours of total interruption duration in each of the last three years
69kV or above	3	9
Between 15kV & 69kV	4	12
15kV or below	6	18

In its 2007 reliability report, AmerenIP reported that the following numbers of customers in each of the above categories exceeded the service reliability targets in each of the three preceding years:

	<u>Frequency</u>	<u>Duration</u>
• 69kV or above:	None	None
• Between 15kV & 69 kV:	None	None
• 15kV or below:	None	397

The breakdown of AmerenIP reliability target violations in 2007 by the number of consecutive years is shown in Table 2:

Table 2
AmerenIP CUSTOMERS EXCEEDING RELIABILITY TARGETS IN 2007

Consecutive Years	AmerenIP Customers
3	310
4	47
5	40
6	0
3 or more years total:	397

A year-by-year comparison of the total numbers of AmerenIP customers exceeding the reliability targets is shown in Table 3:

Table 3
TOTAL AmerenIP CUSTOMERS EXCEEDING RELIABILITY TARGETS BY YEAR

Year	Number of Customers	Prior Year Number of Customers as a % of 2007 Customers Exceeding Targets
2007	397	---
2006	5,356	1,349%
2005	1,539	388%
2004	369	93%
2003	160	40%

It is very positive, though not surprising, that the 397 AmerenIP customers exceeding the reliability targets in 2007 is only 7.4% of the number (5,356) reported by AmerenIP for year 2006 and 25.8% of the number (1,539) reported for year 2005, years in which widespread major storms were a much larger factor. The “terrible trend that AmerenIP needs to be concerned about”, as mentioned by Staff in last year’s reliability assessment report, seems to have been stopped in 2007. Additional years of data will be needed, however, to determine AmerenIP’s success in establishing and sustaining a positive trend for this data.

AmerenIP investigated each of the target violations reported in its 2007 reliability report, determined the causes for the service interruptions, and reported specific actions taken and planned to address these problems. AmerenIP’s reported actions taken and planned seem reasonable.

It is also noteworthy that AmerenIP reported that 10,970 of its customers experienced more than six interruptions in 2007, down 77% from the 47,931 customers in this category in 2006, but up 54% and 42%, respectively, from years 2005 and 2004. In the extreme cases, a total of 670 AmerenIP customers experienced more than ten interruptions in 2007, compared to 3,287 customers in 2006, 94 customers in 2005, and 110 in 2004. While Staff understands that the major storms were to blame for most of the extreme cases of customer interruptions in 2006, the 2007 data is still trending upward from prior years exclusive of year 2006. AmerenIP should make every effort to prevent a continuing upward trend of this data exclusive of year 2006. See Section 8 of this report for more information on this, including trends of AmerenIP customers experiencing high numbers of interruptions.

7. Analysis of AmerenIP’s Year 2007 Reliability Performance

A. Statistical Reliability Data

Table 4 shows AmerenIP’s company-wide reliability indices for calendar year 2007 compared to the other five reporting Illinois electric utilities. This data indicates that AmerenIP had the second lowest (second best) average frequency of system interruptions (SAIFI) and tied for the second lowest average frequency of customer interruptions (CAIFI) in the six-utility group in 2007, bettered only by AmerenCILCO in both categories. This

was a significant improvement for AmerenIP, since it had the highest (worst) SAIFI and CAIFI in the six-utility group in 2006

With a company-wide CAIDI of 346 minutes (5.77 hours) in 2007, AmerenIP reported the highest (worst) average duration of customer interruptions in the six-utility group for the third year in a row. Even so, this was a tremendous improvement from its 2006 CAIDI of 1,545 minutes (25.75 hours) when widespread major storms were much more of a contributing factor.

Table 4
ILLINOIS UTILITY RELIABILITY INDICES
CALENDAR YEAR 2007

	SAIFI	CAIDI (minutes)	CAIFI
AmerenCILCO	1.16	151	1.98
AmerenCIPS	1.46	146	2.13
AmerenIP	1.38	346	2.13
ComEd	1.53	193	2.24
MidAmerican	3.9532	291.11	4.3701
Mt. Carmel	2.56	62.70	2.74

SAIFI: System Average Interruption Frequency Index. This represents the average interruption frequency for all customers on the electric system, including customers who had no interruptions (total customer interruptions divided by total system customers).

CAIDI: Customer Average Interruption Duration Index. This represents, for the group of customers that actually had one or more interruptions, the average interruption duration.

CAIFI: Customer Average Interruption Frequency Index. This represents the average interruption frequency for the group of customers that had interruptions. A CAIFI index much higher than SAIFI suggests that subsets of customers experienced significantly more frequent interruptions than the overall system average.

Note: The comparison of company-wide reliability indices for Illinois electric utilities should indicate relative reliability levels achieved. The reader of this report should, however, keep in mind that each Illinois electric utility has a unique electric system, a unique group of customers, and a unique method of defining, recording, and reporting the interruption data. These differences make precise utility-to-utility comparisons difficult.

Table 5 shows a breakdown of fifteen causes of sustained customer interruptions by cause category, as reported by AmerenIP for year 2007. The total number of interruptions (“events”) reported for 2007 was two-thirds of the number reported for 2006, but up 5.5% from year 2005. The total number of customer interruptions in 2007 was 58% of those reported for 2006 and about 1.4% higher than for year 2005.

AmerenIP reported that the highest percentages of customer interruptions in 2007 were caused by overhead equipment problems (21.74%) and weather (16.70%). “Intentional” (12.79%) and substation equipment problems (10.31%) were the next leading causes.

AmerenIP listed trees as the cause for 8.40% of the events and 5.11% of the customer interruptions in 2007.

Beginning with the 2007 data, Ameren is using a more refined analytical process to determine when “weather” provides a truly accurate description of the cause of the outage. Outages (interruptions) are attributed to weather only when an analysis concludes that weather conditions exceeded the facility design criteria specified by the NESC zoning requirements for Illinois. This is a significant improvement, resulting in fewer interruptions being attributed to weather when other causes are more applicable.

Table 5
TOTAL INTERRUPTIONS BREAKDOWN BY CAUSE

Interruption Cause Category	Events	Customers Interrupted	Percent of Events	Percent of Customer Interruptions
Animal Related	2,580	84,680	12.52%	8.53%
Customer	44	5,195	0.21%	0.52%
Intentional	3,478	127,245	16.88%	12.79%
Jurisdictional Entity / Contractor Personnel Errors	90	20,655	0.44%	2.08%
Loss of Supply	79	1,922	0.38%	0.19%
Other	2,670	76,437	12.96%	7.68%
Overhead Equipment Related	5,282	216,281	25.63%	21.74%
Public	626	54,488	3.04%	5.48%
Substation Equipment Related	86	102,610	0.42%	10.31%
Transmission	12	4,779	0.06%	0.48%
Tree Related	952	25,601	4.62%	2.57%
Tree Related – Tree Broken	780	25,253	3.78%	2.54%
Underground Equipment Related	1,200	34,163	5.82%	3.43%
Unknown	929	49,429	4.51%	4.97%
Weather	1,800	166,136	8.73%	16.70%
TOTALS:	20,608	994,874	100.00%	100.00%

B. Worst Performing Circuits Data

Code Part 411.120(b)(3)(I)&(J) requires the reporting utility to list its worst performing circuits (subsection I) and then state (subsection J) what corrective actions are planned to improve those circuits' performance. Table 6 shows the AmerenIP circuits with the highest (worst) reliability indices for 2007. The bolded values in the SAIFI, CAIFI, and CAIDI columns represent the indices that caused the circuit to be a worst performer.

Table 6
AmerenIP CIRCUITS WITH HIGHEST SAIFI, CAIFI, & CAIDI
CALENDAR YEAR 2007

<u>Substation</u>	<u>Circuit</u>	<u>SAIFI</u>	<u>CAIFI</u>	<u>CAIDI</u> (minutes)
Altona	J08205	2.35	2.35*	2651
Cambridge	K07322	1.39	1.62	3086
DePue	L43154	0.05	1.00	1951
Galva (Galva, Bishop Hill, Nekoma, & rural)	M31203	4.65	4.68	761
Galesburg Irwin St. (Galesburg & rural)	M37191	5.47	5.47*	453
Galesburg Monmouth Blvd.	M40117	2.16	2.16	1783
Galesburg N. Seminary St.	M41111	5.11	5.11*	958
Galesburg Powerhouse	M42614	0.47	1.00	2486
Granite City Maryland (Granite City)	M78324	4.42	4.42*	49
Jacksonville Anna St.	N48110	0.78	1.11	2220
Jacksonville Power Plant (Jacksonville, Arcadia, & rural)	N50331	4.08	4.08*	1342
Jacksonville West Side	N54214	2.21	2.21	1795
Monmouth	P47120	4.09	4.09*	693
Monmouth (Monmouth, Cameron, Ormonde, Larchland, Berwick, & rural)	P47123	5.36	5.36*	716
Monmouth	P47125	1.65	1.65*	2542
Monmouth (Monmouth)	P47169	4.42	4.42*	869
Oquawka Rural (Oquawka & rural)	Q32170	4.08	4.08*	1760
Oquawka Rural	Q32171	2.21	2.21*	1824
South Farnham St.	R05114	4.08	4.08*	720

*Notes: Altona Circuit J08205 was also a worst SAIFI performer in 2004.
Galesburg Monmouth Blvd. Circuit M40117 was also a worst SAIFI performer in 1998.
Granite City Maryland Circuit M78324 was also a worst SAIFI performer in 2006.
Jacksonville Anna St. Circuit N48110 was also a worst CAIDI performer in 1999.
Jacksonville Power Plant Circuit N50331 was also a worst SAIFI performer in 2004 & 1999.
Monmouth Circuit P47125 was also a worst CAIDI performer in 1998.
Oquawka Rural Circuit Q32171 was also a worst CAIDI performer in 1998.*

** Ameren reported that it changed CAIFI to equal SAIFI for these circuits because "indices are based upon end-of-year customer counts which can vary significantly due to circuit reconfiguration."*

C. Circuit Inspections

As part of Staff's review of AmerenIP's 2007 reliability, Senior Electrical Engineer Jim Spencer inspected the seven AmerenIP worst performing circuits which have their circuit

numbers indicated in bold in Table 6. He also performed inspections of 2006 worst CAIDI Circuit R93351 (Wanda, Roxana, & rural), 2006 worst CAIDI Circuit K39153 (Clinton, Lane, & rural), 2006 worst SAIFI Circuit M49410 (Glen Carbon), and the following seven AmerenIP 2007 “next-worst SAIFI” circuits:

- Granite City Maryland Circuit M78322 (Granite City)
- Porter Rd. Circuit Q21293 (Fairview Heights, O’Fallon, & rural Collinsville)
- Concord Circuit K62102 (Concord, Chapin, Arenzville, & rural)
- South Jacksonville Circuit R06212 (Jacksonville, South Jacksonville, & rural)
- South Edwardsville Circuit R04413 (Edwardsville)
- Kewanee South St. Circuit N70332 (Kewanee & rural)
- Marseilles Circuit P26284 (Marseilles & rural)

Staff also performed spot-checks of prior-year or newly discovered current-year circuit problems on the following twenty-one circuits:

- Circuit L12127 (Decatur)
- Circuit P54828 (Harvel)
- Circuit P98193 (Normal)
- Circuit J67132 (Bloomington)
- Circuit K36251 (Clinton)
- Circuit M26164 (west of Warrensburg)
- Circuit M18131 (west of Decatur)
- Circuit M05360 (Edwardsville)
- Circuit J12166 (southwest of Argenta)
- Circuit Q34366 (Ottawa)
- Circuit Q34360 (Ottawa)
- Circuit K91115 (Decatur)
- 34 kV Line 3416 (Decatur)
- Circuit L24122 (Mt. Zion)
- Circuit K65221 (east of Ellsworth)
- Circuit L70125 (Danville)
- Circuit L68115 (Danville)
- Circuit L68114 (Danville)
- Circuit L73155 (Danville)
- Circuit L74191 (Danville)
- Circuit R06212 (South Jacksonville)

In addition to the above circuit inspections, Staff performed random inspections of tree trimming conditions (and other circuit problems) in Jacksonville and South Jacksonville. Details of these tree trimming inspections are provided in Attachment “S” to this report and are summarized later in this section under subheading “D”.

Ameren personnel accompanied Jim Spencer, Staff’s Senior Electrical Engineer, on twelve of these circuit inspections and on eight spot-checks. All Ameren personnel were very

cooperative and helpful in accomplishing the work. Bev Hall, Ameren's Reliability Engineering Specialist, was especially helpful to Staff in providing the needed circuit maps and other requested information, in coordinating Ameren's participation in the inspections, and by her own participation in 6 ½ of the AmerenIP circuit inspections and six spot-checks.

The field inspections allow Staff to verify that work was performed on the circuits as reported by the utilities and to see if there are any apparent reasons for poor performance of these circuits. Staff also notes any problems with the facilities it observes which may pose a threat to future service reliability or to public safety. For example, Staff looks for poor tree trimming practices, broken or deteriorated poles, split crossarms, damaged electrical devices, violations of the National Electrical Safety Code, etc.

Summaries of items noted by Staff during the field inspections of the selected AmerenIP distribution circuits this year are included in this report as Attachments "A" through "R". Note that the circuit problems summarized on the attachments and those shown in the photos in this report are not intended to be representative of the predominant or average condition of the applicable circuits. Instead, they are representative of some of the more serious problems Staff observed which are contributing to, or can contribute to, service reliability or public safety issues if not given proper attention by the utility. *(As mentioned to AmerenIP when providing them with a copy of these summaries, the summary for each of the circuits inspected represents typical observations noted by ICC Staff during the field inspections and is not intended to represent all of the problems or potential problems that may exist on each circuit. Also, Staff's inspections are not intended to take the place of the more thorough, detailed inspections that should be performed periodically by the utility company.)*

There were several mapping errors and a few cases where roads or streets were not labeled on the circuit maps provided by AmerenIP again this year. AmerenIP has continued to make progress in these areas from prior years, but it should continue its efforts to improve its circuit maps and make them more user friendly.

Monmouth 12 kV Circuit P47123 was one of AmerenIP's worst performing circuits in 2007, with a SAIFI of 5.36. This circuit serves a southern portion of Monmouth and a large rural area south and southeast of Monmouth, as well as the communities of Cameron, Ormonde, Larchland, and Berwick. AmerenIP attributed 74% of the customer interruptions on this circuit to weather (including a February 2007 ice storm), 8% to overhead equipment problems, and 15% to "other" causes in 2007. During its inspection of this circuit on February 13 and 14, 2008, Staff found many new poles and crossarms scattered throughout the circuit, probably the result of storm damage repair. About one mile of the circuit is scheduled for reconductoring in 2008 in a line section (11 spans) where Staff found many conductor splices and patch rods. Some of these spans have as many as fifteen splices in the primary phase conductors per span. Staff noted that very few animal guards have been installed in Cameron (many more are needed there), but animal guarding on the rest of the circuit looked okay. Staff noted lightning arrester problems at

fourteen locations, and 26 missing guy markers². Trees were close to the primary conductors at only a few locations. Mapping errors were noted on six of the circuit maps provided. **Staff noted one obvious NESC guying violation (see Figure 9), though it did not look for them.** See Attachment “A” for a summary of Staff’s inspection notes. Figures 1 through 10 show some of the problems noted on this circuit.



Figure 1 (Photo 08-IP1818)
Badly lightning damaged pole top
Circuit P47123, Rd. 1300N, west of
Larchland

Figure 2 (Photo 08-IP1816)
Split pole top, insulator coming off pin, &
neutral falling off pole
Circuit P47123, Rd. 1300N,
west of Larchland



² Guy markers are devices placed on the ground end of downguys for the purpose of making the downguys more readily visible to pedestrian or vehicular traffic. The absence of these markers can increase the risk of physical injury to the public and increase the risk of damage to the utility’s line the downguy is attached to if the unmarked downguy is hit by pedestrian or vehicular traffic.

Figure 3 (Photo 08-IP1812)
Broken strand in single-phase 6A CWC primary
Circuit P47123, Rd. 1500N, west of Ormone

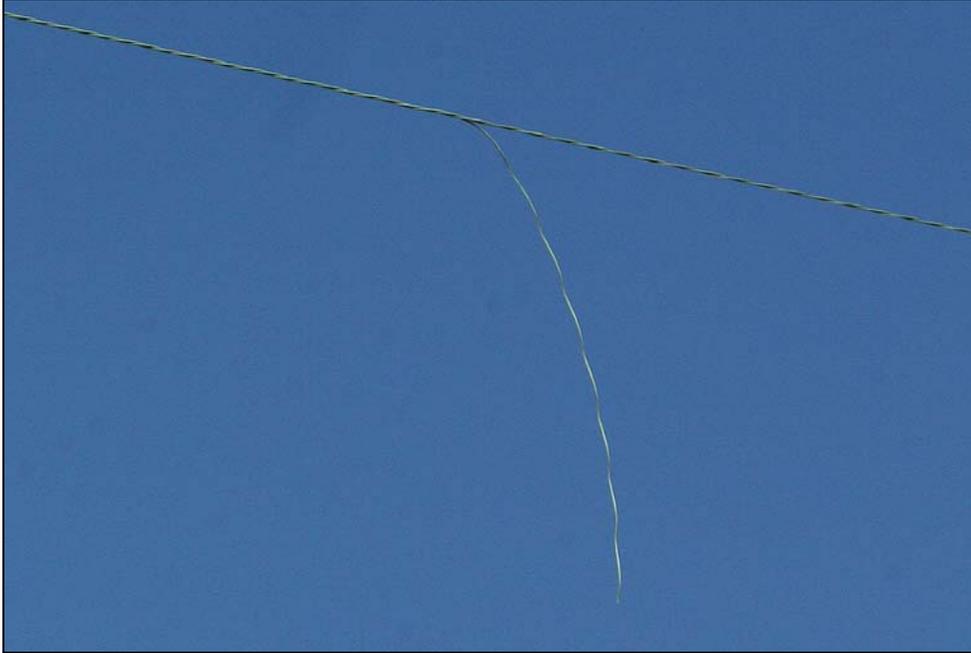
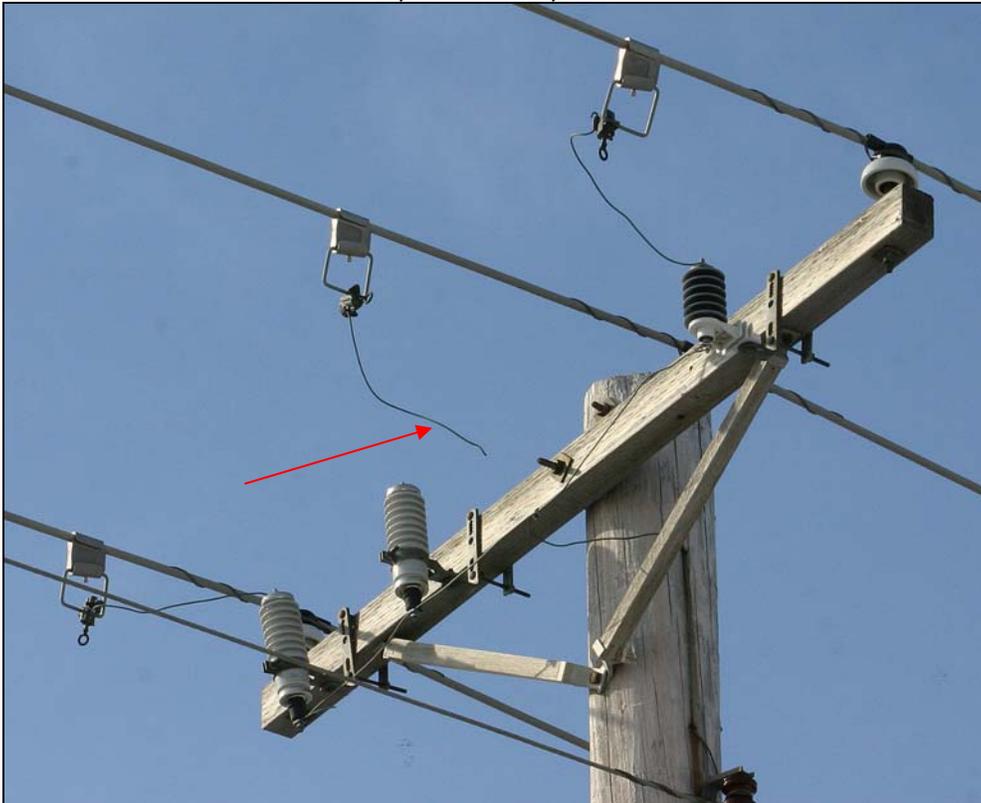
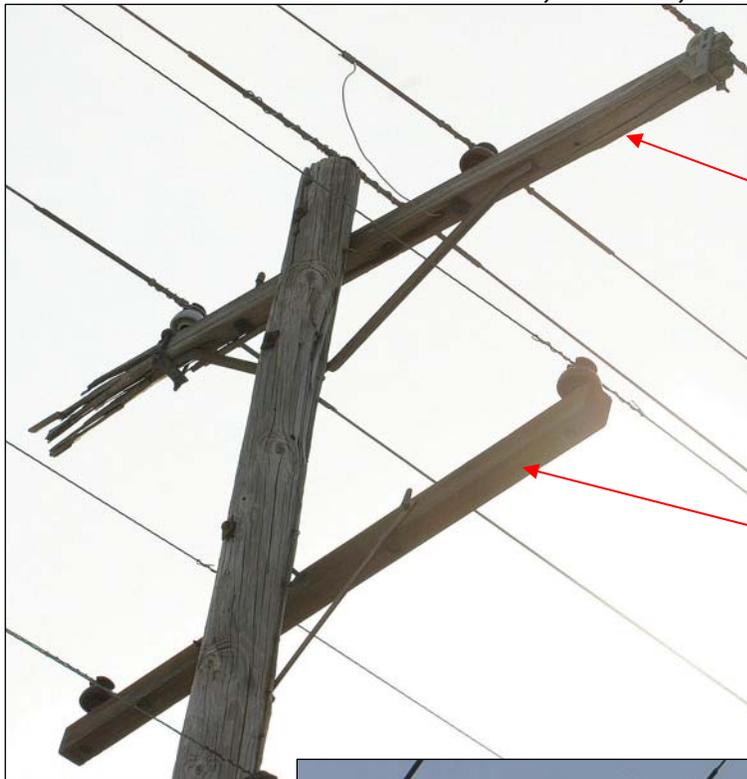


Figure 4 (Photo 08-IP1831)
Broken jumper to top of center lightning arrester
Circuit P47123, Rd. 1600N, north of Ormone



Figures 5 & 6 (Photos 08-IP1829 & 1830)
Badly deteriorated CO-OP crossarm above AmerenIP 3-phase circuit
Circuit P47123, Rd. 900E, north of Ormone



Co-op crossarm

AmerenIP 3-phase circuit



Co-op crossarm

AmerenIP circuit

Figures 7 & 8 (Photos 08-IP1822 & 1823)
Poletop pin coming off pole & primary conductor about to fall
Circuit P47123, Rd. 1400N, northwest of Berwick
(AmerenIP notified 2/20/08 & made repairs that day)

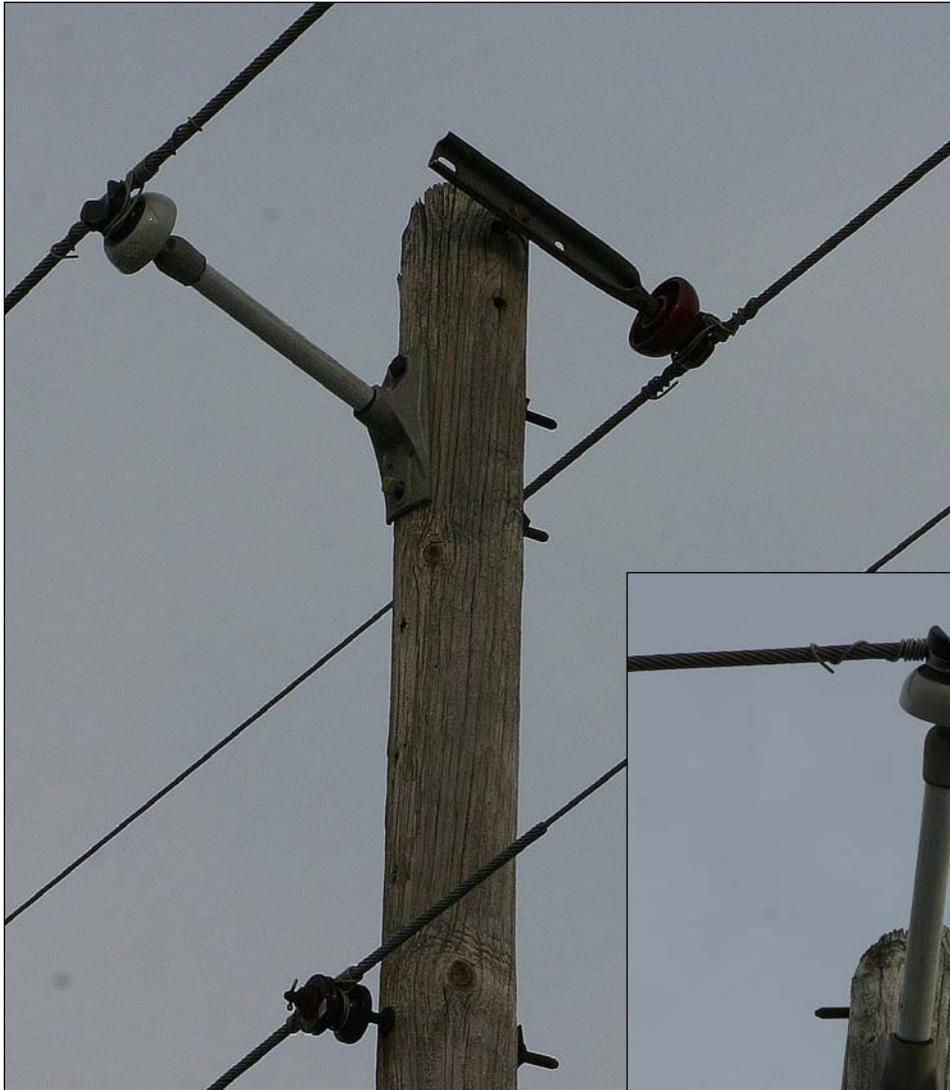


Figure 9 (Photo 08-IP1819)

**Ungrounded 69 kV downguy without strain insulator properly placed below 12 kV
conductors (NESC Guying Violation)**

Circuit P47123 (69 kV Str. 293), Rd. 1400N, southwest of Cameron



Figure 10 (Photo 08-IP1828)
Field side lightning arrester missing, center arrester disconnected,
& road side arrester blown
Circuit P47123, Rd. 1100E, southwest of Cameron



Monmouth 12 kV Circuit P47169, serving a central and eastern part of the City of Monmouth, was another AmerenIP worst performing circuit in 2007, with a SAIFI of 4.42. AmerenIP attributed 63% of the customer interruptions on this circuit in 2007 to weather (including a February 2007 ice storm) and 11% to animals. As noted on Attachment “B”, Staff noted few structural problems and only a few tree problems when inspecting this circuit on February 14, 2008. Animal guards were plentiful. Staff noted twelve missing guy markers, which is a large number for a circuit as small as this one.

Circuit R93351 is a small 12 kV circuit serving Wanda, an eastern part of Roxana, and a small rural area near those communities. This was an AmerenIP worst performing CAIDI circuit in 2006, which Staff inspected on February 20, 2008. Weather (63%) and overhead equipment problems (30%) were listed as the leading causes of the customer interruptions in 2006. Staff noted no circuit problems during its 2008 inspection (see Attachment “C”),

but was only able to inspect the main overhead feeders. A considerable portion of the circuit is either underground, in back easements, or otherwise inaccessible. Staff noted many animal guards on the parts of the circuit inspected, but more may be needed. There were some mapping errors.

Staff inspected Granite City Maryland 4 kV Circuit M78322, serving a portion of Granite City, on February 20, 2008. While not on AmerenIP's worst performing circuits list for 2007, this circuit was one of AmerenIP's next twenty worst SAIFI circuits in 2007, and was a worst performing CAIDI circuit in 2000. Staff noted no structural problems during its inspection, and only one close tree problem. Some animal guards were noted, but more are needed. Some parts of the circuit are in alleys that are not drivable and were not inspected. Attachment "D" is a summary of Staff's few inspection notes for this circuit.

Granite City Maryland 12 kV Circuit M78324 was a worst performing circuit in 2007 (SAIFI=4.42), repeating in that category from year 2006. AmerenIP reported that animals (49%) and overhead equipment problems (28%) were the predominant causes of the customer interruptions on this circuit, serving a portion of Granite City, in 2007. Staff inspected this circuit on February 20, 2008. Staff noted no circuit problems (see Attachment "E"), but only inspected about half or less of this already small circuit due to much of it being in back easements or underground. Some animal guards were noted, but more are needed.

Porter Road Circuit Q21293 is a 12 kV circuit serving portions of Fairview Heights, O'Fallon, and rural Collinsville. This was an AmerenIP next-worst SAIFI circuit in 2007, repeating in that category from 2006, and was a worst performing CAIDI circuit in 1999. About half of the circuit is underground and several sections are cross-country and inaccessible. Staff inspected the accessible parts of the circuit on February 20, 2008. Staff noted several "extra" lightning arresters in the rural areas and several animal guards, but more animal guards are needed. Tree problems were noted at three locations. Staff also noted errors on two of the circuit maps provided. Staff's field notes are summarized on Attachment "F". Figure 11 shows a structural problem noted.

Figure 11 (Photo 08-IP1834)
Split (lightning damaged) wood brace
Circuit Q21293, O'Fallon Ave. west of Rt. 159, south of Collinsville



Galesburg Irwin Street Circuit M37191 had the highest reported SAIFI (5.47) of all AmerenIP circuits in 2007. This 12 kV circuit serves a northeastern portion of Galesburg and a rural area east and northeast of Galesburg. There are several inaccessible and cross country sections, but they represent only a small portion of the circuit. AmerenIP reported that overhead equipment problems (39%) and weather (22%) were the major causes of customer interruptions in 2007. Staff's notes of its inspection of this circuit on February 28, 2008, are summarized on Attachment "G". Animal guarding was very well done, especially in the part of the circuit within the City of Galesburg. Staff noted several "extra" lightning arresters in the rural areas. Trees were close to the primary conductors at three locations, and one very large danger tree was also noted (see Attachment "G" and Figures 14 & 15). Missing guy markers were noted at 21 locations, and errors were noted on three of the circuit maps provided. Figures 12 through 16 show examples of some of the circuit problems noted.

Figure 12 (Photo 08-IP1838)
Deteriorated & split wood pin crossarm
Circuit M37191, Willard St., Galesburg

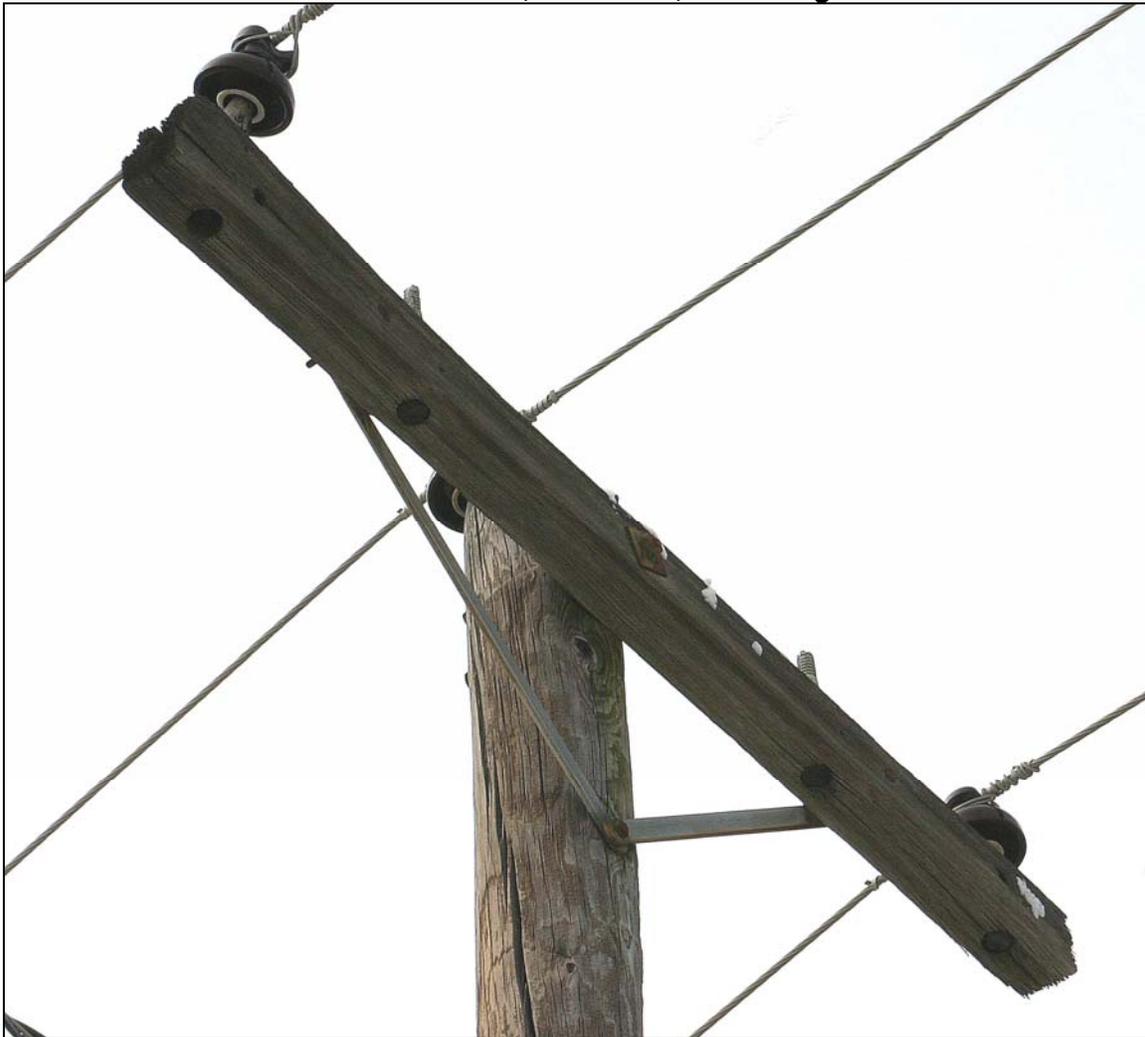


Figure 13 (Photo 08-IP1840)
Badly burned crossarm
Circuit M37191, CH 7, east of Galesburg



Figures 14 & 15 (Photos 08-IP1841 & 1845)
Very large hollow danger tree (approx. 5 ft.(+) dia. tree w/ approx. 4 ft.(+) dia. void)
Circuit M37191, CH 7, east of Galesburg



Figure 16 (Photo 08-IP1846)
Woodpecker holes in pole top & pole top extension leaning
Circuit M37191, Rd. 1950N, southeast of Wataga (NE of Galesburg)



Oquawka Rural Circuit Q32170 was a worst performing 12 kV circuit in 2007, with a SAIFI of 4.08. This circuit serves the City of Oquawka and a large rural area to the north and east of Oquawka. AmerenIP attributed 48% of the customer interruptions on this circuit in 2007 to weather (including the February 2007 ice storm), and 30% to overhead equipment problems. When inspecting this circuit on March 10 & March 11, 2008, Staff noticed many new poles and crossarms scattered throughout the circuit and that animal guarding was very well done in and near the City of Oquawka. More lightning arresters are needed in the rural areas, and several scattered tree clearance issues were noted. Several structural problems were noted, but relatively few for a circuit this size. **Staff noted seventy-two (72) missing guy markers, and there are probably many more.** There were mapping errors on fourteen of the circuit maps provided. See Attachment "H" for a summary of Staff's inspection notes for this circuit, and Figures 17 through 20 for examples of some of the problems noted.

Figure 17 (Photo 08-IP1855)

Broken wood brace

Circuit Q32170, Lincoln St. just west of 10th St., Oquawka



Figure 18 (Photo 08-IP1856)

Broken primary downguy

Circuit Q32170, Rd. 2200N, east of Oquawka



Figure 19 (Photo 08-IP1851)
Badly split pole top w/ large woodpecker holes
Circuit Q32170, Rd. 1900N, southeast of Oquawka



Figure 20 (Photo 08-IP1849)
Neutral conductor off the spool
Circuit Q32170, CH 1, southeast of Oquawka



While not on AmerenIP's list of worst performing circuits for 2007, Circuit K39153 was a worst performing CAIDI circuit in 2006. This 12 kV circuit serves an eastern part of the City of Clinton and a rural area east of Clinton, including the community of Lane. AmerenIP attributed 92% of the customer interruptions on this circuit in 2006 to the November/December 2006 ice storm. Staff chose this circuit for inspection, with Ameren Vice President Ron Pate, because it had not been inspected before by Staff and it was located not far from Decatur. During the inspection on March 25, 2008, Staff noted that there were several new poles and crossarms throughout the circuit, there were many "extra" lightning arresters in the rural areas, and animal guarding was very well done. Errors were noted on several of the circuit maps provided. **Staff noted NESC guying violations at seven locations, all involving ungrounded guys without properly placed strain insulators, but did not try to find others. NESC railroad crossing violations were also noted at one location.** See subheading "E" later in this section for more discussion of the NESC violations. Figures 21 through 23 show some of the circuit problems noted, and Attachment "I" is a summary of Staff's field notes for this circuit.

Figure 21 (Photo 08-IP1867)
Single wood crossarms on both sides of a railroad crossing
(NESC Railroad Crossing Violations)
Circuit K39153, CH 1 just south of Rt. 10, Clinton



Figure 22 (Photo 08-IP1870)
Badly split pole top
Circuit K39153, CH 18, southeast of Clinton



Figure 23 (Photo 08-IP1863)
Four ungrounded 12 kV downguys without strain insulators
(NESC Guying Violations)
Circuit K39153, Rd. 1600E, southeast of Lane



Concord 12 kV Circuit K62102, serving Concord, Chapin, Arenzville, and a large rural area around those communities and northwest of Jacksonville, was on AmerenIP's list of the next 20 worst SAIFI circuits in 2007. Staff inspected roughly 75% of this circuit on April 1 & April 2, 2008, noting several new poles and crossarms, many "extra" lightning arresters in the rural areas, and that animal guarding was very well done. Trees were into or very close to the primary at fifteen locations. Among the other circuit problems noted were twelve cases of split or deteriorated pole tops and eighteen missing guy markers. Several mapping errors were noted. **Staff noted NESC ground clearance violations at seven locations. Staff also noted NESC guying violations at seven locations, though it did not attempt to find others.** See subheading "E" later in this section for more discussion of the NESC violations. See Attachment "J" for a summary of Staff's field notes for this circuit. Figures 24 through 26 are photographs of three of the circuit problems noted.

Figure 24 (Photo 08-IP1875)

Four ungrounded 69 kV & one 12 kV overhead guys with strain insulators not properly positioned (NESC Guying Violations)

Circuit K62102, Bethel Ln. & Base Line Rd., northwest of Chapin



Figure 25 (Photo 08-IP1887)
Ungrounded 7.2 kV downguy with strain insulator not low enough (ON NEW POLE)
(NESC Guying Violation)
Circuit K62102, Apples Rd., east of Chapin



Figure 26 (Photo 08-IP1879)
Badly damaged pole top
Circuit K62102, Poor Farm Rd., east of Concord



South Jacksonville 12 kV Circuit R06212 was also an AmerenIP next-worst SAIFI circuit in 2007, serving a very small southeastern part of Jacksonville, part of South Jacksonville, and a rural area south of those cities. Staff inspected roughly 75% of this circuit on April 2, 2008, noting that animal guarding was very well done. There were few trees on the circuit. There were some mapping errors. **Staff noted NESC ground clearance violations at two locations and a railroad crossing violation at one location. Staff also noted one NESC guying violation, though it did not try to find others.** Staff's inspection notes are summarized on Attachment "K". Figures 27 and 28 show two of the problems found. **Staff found another NESC clearance violation on this circuit during its random inspection of tree trimming in South Jacksonville on May 12, 2008 (see Attachment "S").**

Figure 27 (Photo 08-IP1890)
Deteriorated crossarms
Circuit R06212, Laurel Dr., South Jacksonville



Figure 28 (Photo 08-IP1893)
Single wood crossarm on the east side of a railroad crossing
(NESC Railroad Crossing Violation)
Circuit R06212, E. Vandalia St., South Jacksonville



Circuit M49410 is a 12 kV circuit serving a portion of the City of Glen Carbon. This circuit was a worst performing AmerenIP circuit in 2006 (not in 2007), with 54% of the customer interruptions that year attributed to summer and winter storms. About half of the circuit is underground and there are some inaccessible areas. During its inspection on April 14, 2008, Staff noted only a few circuit problems, summarized on Attachment "L". Animal guarding was very well done. **NESC guying violations were noted at two locations, though Staff noticed more and did not try to find others.** There were errors on some of the circuit maps provided. Figure 29 shows one of the problems noted.

Figure 29 (Photo 08-IP1894)
Vines around transformer on pole
Circuit M49410, Easement south of Hampton Dr., Glen Carbon



South Edwardsville 12 kV Circuit R04413 was an AmerenIP next-worst SAIFI circuit in 2007, with a SAIFI of 3.11, and was a worst performing SAIFI circuit in 2006. Much of this circuit is underground, serving a small southern part of Edwardsville. Staff inspected the accessible overhead portions of this circuit on April 14, 2008, noting no problems (see Attachment “M”).

Galva Circuit M31203 is a 12 kV circuit serving a rural area from Galva westward past Nekoma, including the communities of Bishop Hill and Nekoma. With a SAIFI of 4.65, this was an AmerenIP worst performing circuit in 2007, and it was a next-worst SAIFI circuit in 2003. AmerenIP attributed 83% of the customer interruptions in 2007 to weather, with another 16% attributed to overhead equipment problems. Staff inspected this circuit on April 15, 2008, noting many “extra” lightning arresters in the rural areas and that animal guarding was at least “okay”. There are relatively few trees on the circuit, but tree clearance problems were noted at two locations. There are many deteriorated crossarms, many of which have been repaired by utilization of saddle pins. Seventy-seven (77) missing guy markers were noted, and there are probably more. **Staff noted an NESC neutral ground clearance violation at one location and a railroad crossing violation at another location. Staff also noted NESC guying violations at sixteen (16) locations, noticed others, but made no effort to find more.** See Attachment “N” for a summary of Staff’s inspection field notes. Figures 30 through 33 show examples of some of the circuit problems noted.

Figure 30 (Photo 08-IP1903)

**Badly deteriorated crossarm with saddle pins & primary falling off end of arm
Circuit M31203, 7th St., Nekoma**



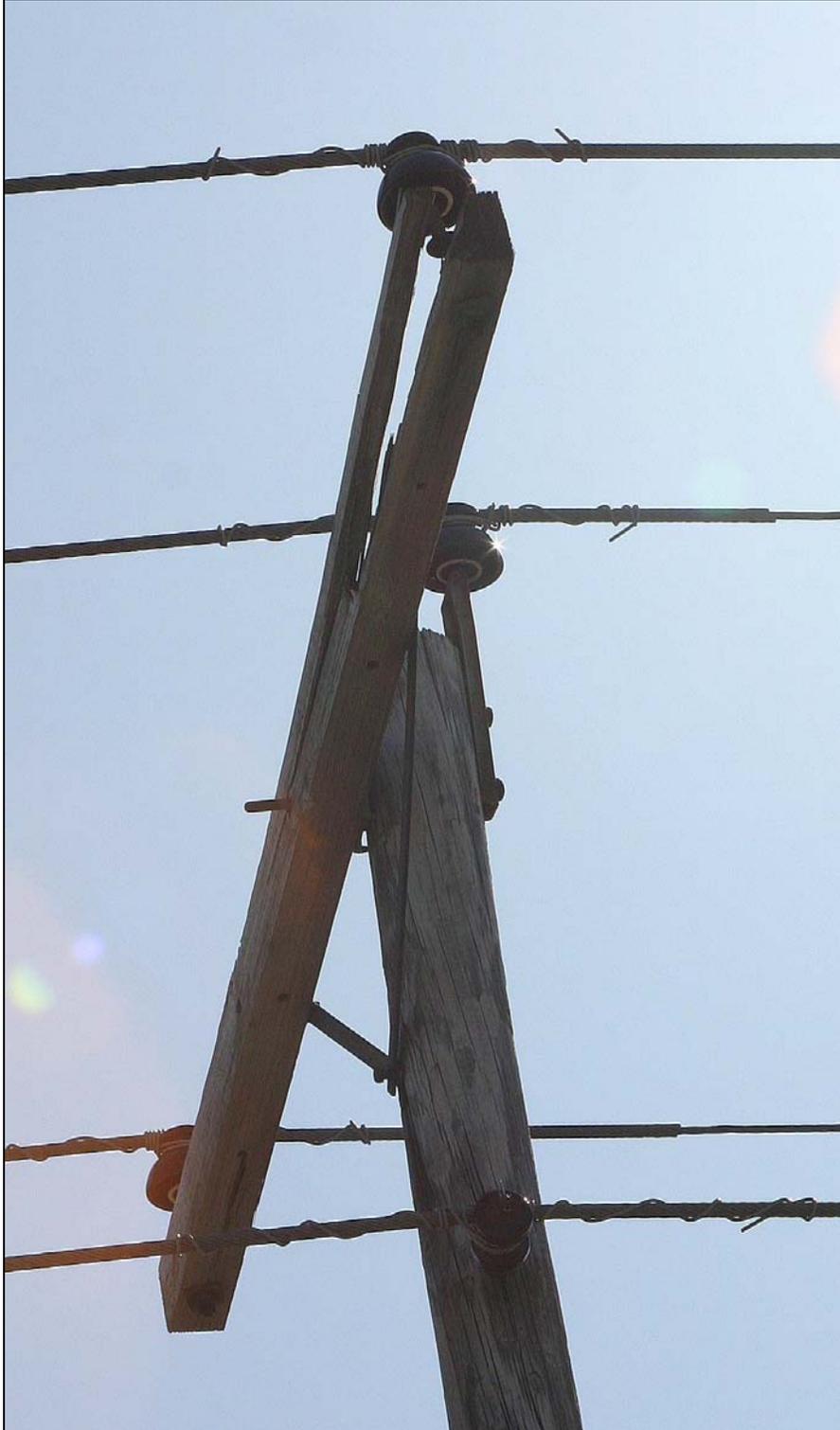
Figure 31 (Photo 08-IP1900)
Single wood crossarm on the south side of a railroad crossing
(NESC Railroad Crossing Violation)
Circuit M31203, Rd. 1800E, southwest of Galva



Figure 32 (Photo 08-IP1896)
Lightning damaged crossarm—wired together (see arrow)
Circuit M31203, Rd. 1850E, northwest of Galva



Figure 33 (Photo 08-IP1898)
Badly split (lightning damaged) crossarm
Circuit M31203, Rd. 1770E, west of Galva



Kewanee South Street 12 kV Circuit N70332 serves the south edge of Kewanee and a rural area south of Kewanee. This was an AmerenIP next-worst SAIFI circuit in 2007, with a SAIFI of 3.44. During its inspection of this circuit on April 14 and 15, 2008, Staff saw several new poles in the circuit, but also noted eighteen (18) shell rotted poles and another pole badly burned at the ground line. There are many “extra” lightning arresters in the rural areas, and animal guarding is well done. Fourteen missing guy markers were noted. **Staff noted NESC guying violations at seven locations, but did not try to find others.** Attachment “O” is a summary of Staff’s field notes for this circuit. Figures 34 through 36 are photographs of some of the problems noted.

Figure 34 (Photo 08-IP1905)
**Badly shell rotted & lightning damaged pole
with bad top**
Circuit N70332, Rd. 2450E, south of Kewanee



Figure 35 (Photo 08-IP1907)
**Pole badly burned at ground line
(marked for replacement)**
Circuit N70332, Rd. 2550E, south of Kewanee



Figure 36 (Photo 08-IP1908)
Badly split (lightning damaged) crossarm
Circuit N70332, Rd. 2750E, south of Kewanee



Marseilles Circuit P26284 was another of AmerenIP's next-worst SAIFI circuits in 2007, with a SAIFI of 3.35. This 12 kV circuit serves a small southern part of Marseilles and a rural area southwest, south, and southeast of Marseilles. Staff inspected this circuit on April 23, 2008, noting several new poles, but also noting twelve (12) shell rotted poles and several other poles and crossarms with structural deterioration or damage (see Attachment "P"). Animal guarding is "hit and miss", and more animal guards are needed. More lightning arresters are needed in the rural areas. Tree trimming was in progress during Staff's inspection, was generally very well done, but four close tree clearance locations were noted. Eleven missing guy markers were noted. **Staff noted NESC guying violations at nine locations, but made no effort to find others.** Figures 37 and 38 show two of the structural problems noted.

Figure 37 (Photo 08-IP1912)
Split pole top & woodpecker hole in pole
Circuit P26284, Troll Rd., south of Marseilles



Figure 38 (Photo 08-IP1910)
Badly deteriorated & weakened pole top (at 3-way corner)
Circuit P26284, E. of 2350th Rd., south of Marseilles



With a SAIFI of 4.08, Jacksonville Power Plant 12 kV Circuit N50331 was an AmerenIP worst performing circuit in 2007, repeating in that category from 2004 and 1999. This circuit serves a northern and eastern part of Jacksonville and a rural area east of and north of Jacksonville, including the community of Arcadia. Weather (71%) and overhead equipment problems (12%) were the predominant causes for the customer interruptions in 2007. Staff inspected the portion of the circuit feeding east and northeast from Jacksonville (approximately half of the circuit) on May 12, 2008, noting that tree trimming was well done, with a few exceptions noted. Animal guarding was well done. Several “extra” lightning arresters were noted in the rural areas, but more may be needed. There are several new crossarms and some new poles. **Staff noted an NESC ground clearance violation at one location** in a de-energized section of the circuit where there was a broken primary pole (see Figures 41 & 42). **Staff also noted an NESC railroad crossing violation at one location and an NESC guying violation at another location, but made no effort to find other guying violations.** See Attachment “Q” for a summary of Staff’s inspection notes for this circuit, and Figures 39 through 42 for photos of some of the problems noted.

Figure 39 (Photo 08-IP1928)

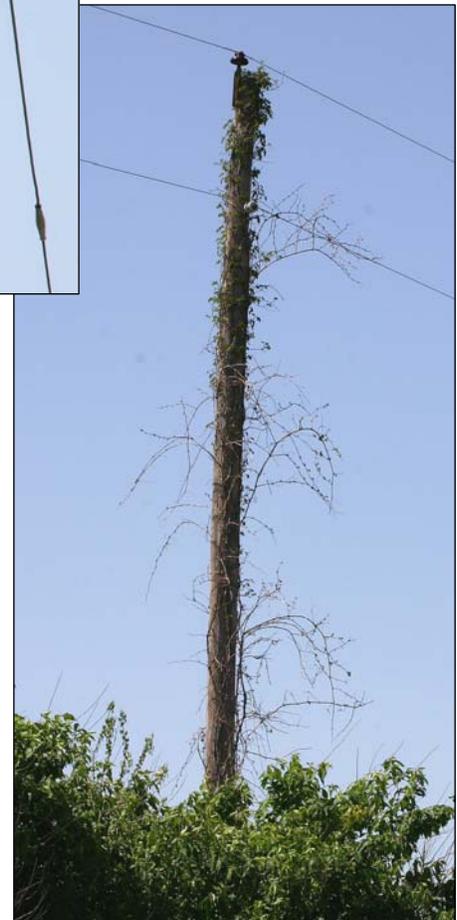
Split pole top

Circuit N50331, York Rd., northeast of Jacksonville

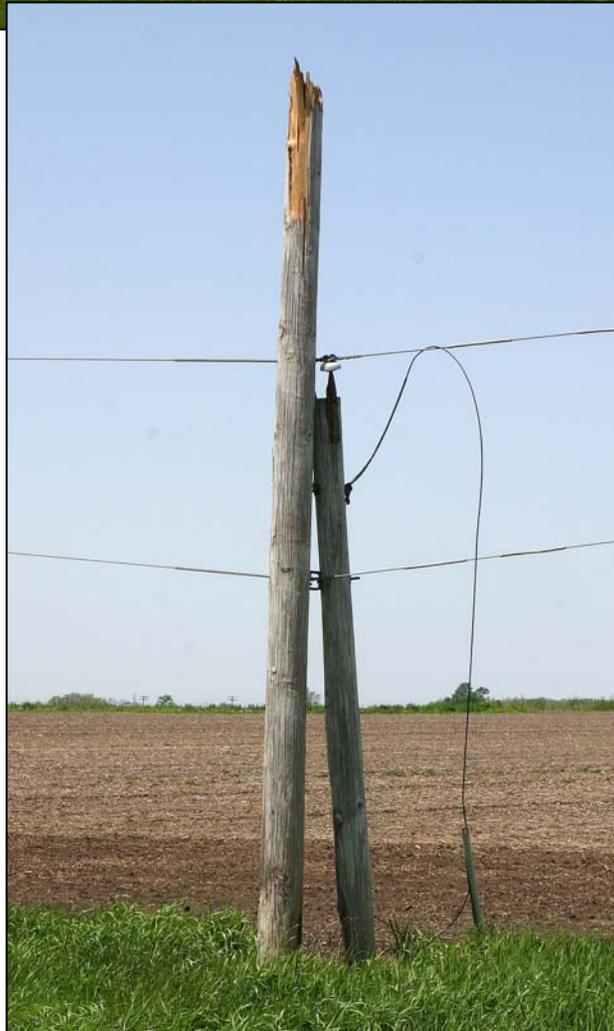


Figure 40 (Photo 08-IP1932)

**Vines up pole to single-phase primary conductor
Circuit N50331, Wohlers Rd., east of Jacksonville**



Figures 41 & 42 (Photos 08-IP1930 & 1931)
Broken pole and broken downguy in de-energized line, resulting in
NESC Ground Clearance Violation
Circuit N50331, Old Rt. 36 East, east of Jacksonville



Staff also performed spot checks of twenty AmerenIP distribution circuits and one 34 kV line during 2008, consisting of follow-ups on NESC violations noted on sixteen circuits during prior-year inspections and new problems discovered on four AmerenIP circuits and the 34 kV line that are not associated with other circuit inspections performed by ICC Staff. These circuit spot checks are summarized on Attachment "R". All of the needed corrections of year 2007 NESC violations at locations chosen for re-inspection had been made. **Among the new problems Staff discovered on the AmerenIP distribution circuits and 34 kV line spot-checked were additional NESC violations at four locations involving the lack of double crossarms at railroad crossings.** Photos of two of the newly discovered AmerenIP NESC railroad crossing violations are shown in Figures 43 and 44.

Figure 43 (Photo 08-IP1859)
Single wood crossarm supporting a 3-phase crossing of a railroad
(NESC Railroad Crossing Violation)
Circuit M18131, Wyckles Rd. north of Rt. 36, west of Decatur



Figure 44 (Photo 08-IP1913)

**Single wood crossarm supporting a 3-phase crossing of a railroad
(NESC Railroad Crossing Violation)**

Circuit K91115, Brush College Rd. south of Reas Bridge Rd. at ADM Substation, Decatur



In summary, Staff's field inspections revealed many new poles and crossarms on several of the AmerenIP circuits inspected again this year, and fewer than the historical number of structural problems. It is apparent to Staff that the storms during the year resulted in many pole replacements on some of the circuits inspected and, therefore, a noticeable improvement in the condition of those circuits. Several significant scattered structural and

other circuit problems remain, however, as noted on Staff's circuit inspection summaries and, in some cases, shown in photographs presented earlier in this report. Tree trimming was well done, overall, on most of the circuits inspected, but Staff noted exceptions on some of the circuits. Animal guarding was generally well done on most of the circuits inspected, with exceptions noted on five circuits inspected where more animal guards are needed. More lightning arresters are needed in the rural areas on three (maybe four) of the circuits inspected. Staff noted relatively high numbers of missing guy markers on eight of the circuits inspected, noting as many as 72 and 77 missing guy markers on two of the circuits. **Staff continued to find many NESC violations during its inspections of AmerenIP circuits this year, noting several NESC clearance violations on four circuits, NESC railroad crossing violations on seven circuits, and NESC guying violations on nine circuits. See subheading "E" for more discussion.**

AmerenIP should investigate all of the problems noted during Staff's circuit inspections, as well as those discovered by its own inspections, and take appropriate remedial actions addressing any problems on those circuits, whether or not noted by Staff, which can significantly affect service reliability or public safety.

D. Tree Trimming

In its reliability assessment report covering AmerenIP's 2006 reliability and Staff's 2007 circuit and tree trimming inspections (in twenty cities), Staff made the following comments:

As stated earlier in this report, tree trimming was well done, overall, on most of the individual AmerenIP circuits Staff inspected this year, but Staff noted several exceptions on some of the circuits. Staff's inspection of tree trimming in the twenty cities revealed that the quality of trimming varied significantly from location to location, but overall was weighted heavily toward the "very well done" end of the spectrum. In seven towns, Staff noted no tree conflicts. In seven other cases, Staff noted only two or three trimming problems. In four towns, trimming was okay to well done in much of the town, but with several to many problems noted in some areas. The two remaining cities, Jacksonville and Carlinville, were the only ones where Staff found tree trimming to be especially bad.

AmerenIP's tree trimming program has declined somewhat from what it was a few years ago, but, based on these inspections, Staff still rates it well above average in the state. Staff believes the decline is due to Ameren's efforts to make its tree trimming program the same for each of its Illinois utilities, a "levelizing" process for its Illinois utilities, resulting in less attention to tree trimming than Illinois Power used to provide. Staff noted several areas this year where AmerenIP's tree trimming was very well done, including an unusual number of towns where Staff found no tree conflicts. The inconsistencies that Staff also noted, however, indicate that AmerenIP is not in compliance with the requirements of 2002 NESC Rule 218 throughout its service territory. It is apparent that AmerenIP is not making sufficient effort to assure adequate tree trimming is being done and properly maintained to assure that there will be no tree contacts with its energized primary³ conductors before it returns to trim them again in all parts of its service territory. Jacksonville has been a perennial problem area, and Staff plans to perform a thorough follow-up tree trimming inspection there in 2008.

Because of the perennial tree trimming problem Staff has observed in Jacksonville, Staff performed random inspections of tree conditions near AmerenIP overhead electric lines in Jacksonville and South Jacksonville again on May 12, 2008. See Attachment "S" for a summary of Staff's notes for those inspections. (Note that Staff also found one NESC clearance violation and four broken spacer cable spacers during its tree trimming inspections in Jacksonville and South Jacksonville, as noted on Attachment "S"). As during last year's inspections, Staff found tree trimming in South Jacksonville to be very well done again this year, with no problems noted. Trimming was inconsistent in Jacksonville, however, with much of the city looking generally okay while there were many tree conflicts

³ The term "primary", as used in this report in relation to electrical facilities, refers to a circuit with a nominal voltage of 2,400 volts or more.

in the west half of town. Again this year, as stated last year, “...tree trimming in Jacksonville has been an issue for several years, and many of those problems have perennially been on the west side of town.” The tree conflicts noted this year were generally less severe than in past years and slightly fewer were noted. So, overall, there has been some improvement in Jacksonville tree conflicts. Considering the storms that have occurred in Jacksonville since last year’s inspections, the continuing communications between Staff and Ameren about Jacksonville tree trimming problems, and the fact that this year’s inspection was near the beginning of the growing season, however, Staff expected to see more of an improvement than the slight amount that was observed. Figures 45 through 49 show some of the tree conflicts Staff observed in Jacksonville.

Figure 45 (Photo 08-IP1920)

Oak trees into primary

State St. east of Finley St. (across from Illinois School for the Deaf), Jacksonville



Figure 46 (Photo 08-IP1922)
Silver maple tree into primary
N. Sandusky north of Duncan Park, Jacksonville

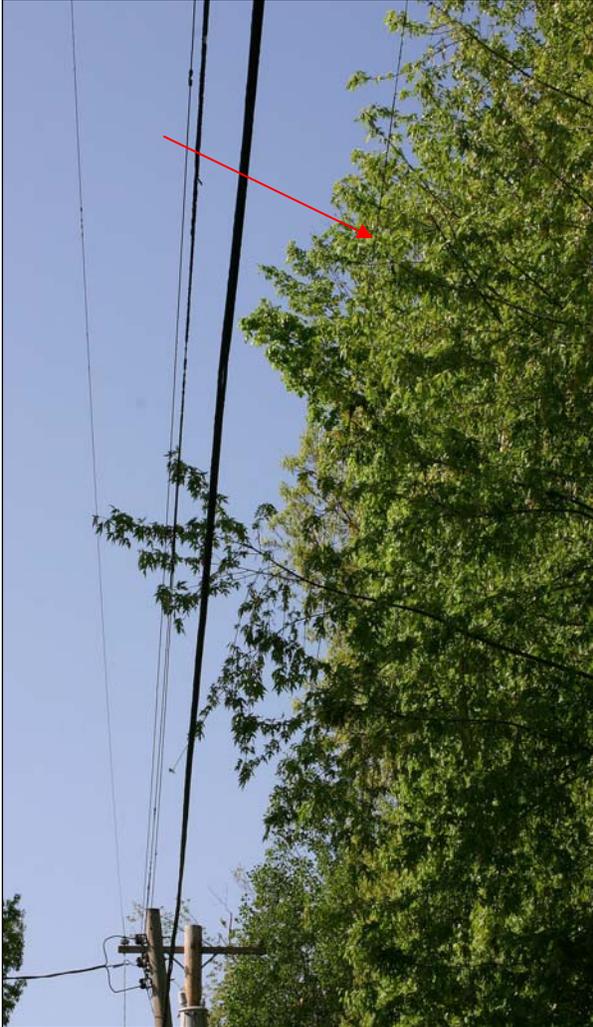
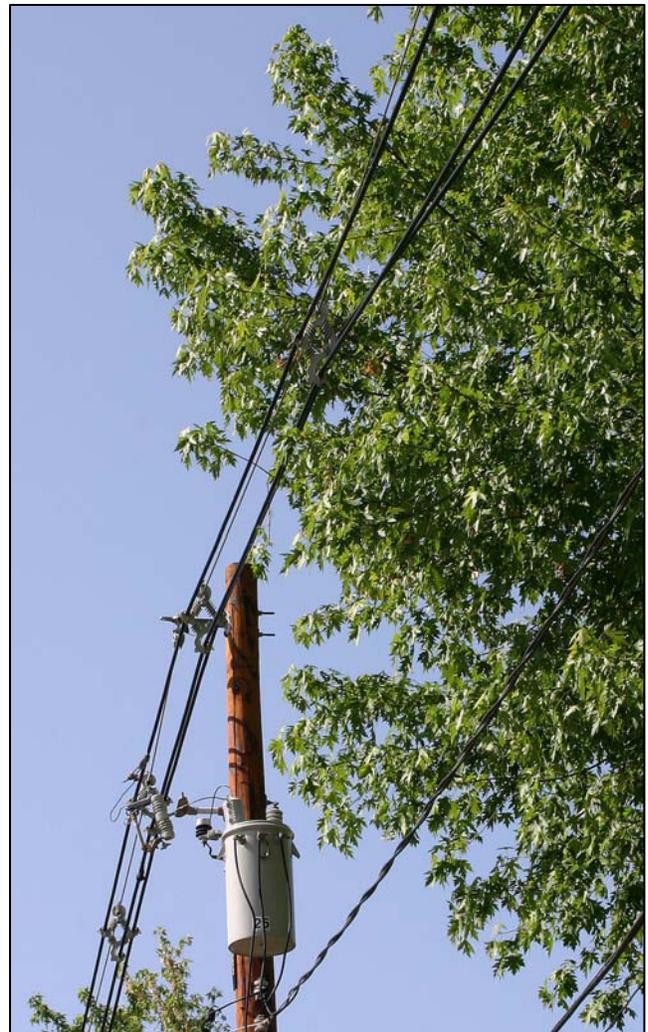
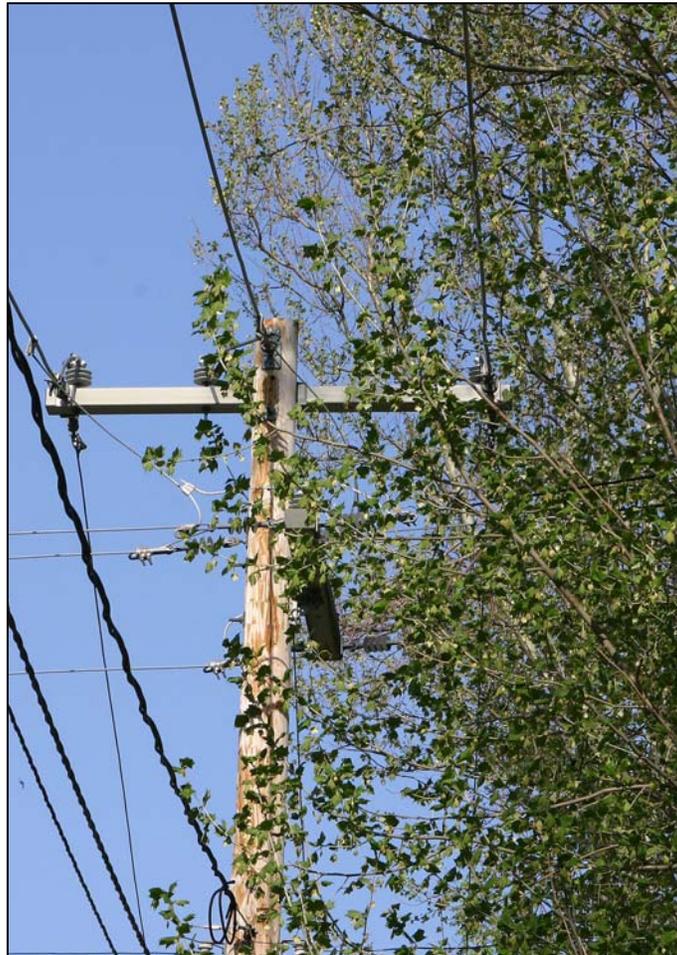


Figure 47 (Photo 08-IP1925)
Silver maple tree into 3-phase spacer cable
Diamond St. just south of Beecher Ave.,
Jacksonville



**Figures 48 & 49 (Photos 08-IP1918 & 1919)
Sycamore tree into & overhanging 3-phase primary
Mound Ave. west of Woodland Place, Jacksonville**



Tree trimming was well done, overall, on most of the AmerenIP circuits Staff inspected this year, but Staff noted (a few) exceptions on some of the circuits.

In summary, most of the tree trimming Staff observed in AmerenIP service territory this year was well done, but there were some areas of inconsistency, especially in Jacksonville. AmerenIP should investigate the problem areas mentioned and determine the cause(s) for the apparent inconsistency of tree trimming in these areas with its otherwise very good tree trimming program in the remaining portions of its service territory. It should also take steps to correct these problem areas and to prevent recurrence of the problem.

Staff has no reason to believe that the AmerenIP tree trimming program is not still well above average in the state. The problem areas discussed in this report, including the photos shown, are meant to demonstrate that AmerenIP still has some work to do, however, to achieve *and maintain* a four-year (minimum) tree trimming cycle that is in compliance with 2002 NESC Rule 218 throughout all parts of its service territory.

2002 NESC Rule 218(A)(1) and its associated note state the following:

“Trees that may interfere with ungrounded supply conductors should be trimmed or removed.

NOTE: Normal tree growth, the combined movement of trees and conductors under adverse weather conditions, voltage, and sagging of conductors at elevated temperatures are among the factors to be considered in determining the extent of trimming required.”

To be in compliance with 2002 NESC Rule 218, AmerenIP needs to assure that all trees near its lines throughout its service territory are trimmed such that there will be no tree contacts with its energized primary⁴ conductors before it returns to trim them again.

In its reliability report, AmerenIP stated that, in addition to maintaining the four-year trim schedule and mid-cycle patrol program, Ameren Illinois utilities also implemented a prescriptive trim program in 2007. This program involves researching tree-related outage information at the circuit level. If the analysis shows poor circuit performance due to tree-related outages, a field patrol is scheduled to develop a prescriptive vegetation management plan in an effort to minimize tree-caused outages at the circuit level.

AmerenIP reported that it trimmed 102% of the circuit miles planned to be trimmed in 2007 and that the number of circuits to be trimmed in 2008 maintains the Company's commitment to adhere to a four-year trim cycle.. Mid-cycle patrols were performed on 170 circuits in 2007, and prescriptive trimming was completed on four circuits. AmerenIP removed a total of 67,719 trees in 2007 as a proactive approach to reducing tree-related outages.

⁴ The term “primary”, as used in this report in relation to electrical facilities, refers to a circuit with a nominal voltage of 2,400 volts or more.

AmerenIP continued its tree replacement program with several cities, including Normal, Bloomington, Decatur, Champaign, Urbana, Galesburg, and Signal Hill School in Belleville in 2007. This is a cooperative effort with the municipalities to share the cost of replacing problem trees under Ameren lines with lower growing, more compatible species. The primary targeted areas within the cities are schools, parks, drainage creeks, and streets.

E. NESC Violations

Staff noted violations of the 2002 National Electrical Safety Code (NESC), currently applicable in Illinois, at seventy-one (71) locations on AmerenIP electric circuits it inspected this year. This total includes a token number of guying violations, but Staff made no effort to look for many of this type of violation, which were so numerous last year and of which there are still known to be thousands on AmerenIP’s electric system. Table 7 is a summary of the NESC violations Staff noted during its AmerenIP circuit inspections in 2008. A description of each of these types of NESC violations is provided following Table 7.

Table 7
Summary of AmerenIP NESC Violations* Noted by ICC Staff in 2008

NESC Violation Category	AmerenIP
Railroad crossings	8
Interstate crossings	0
Clearance issues	12
Guying issues	51
Total:	71

***Note:** The data shown represents the number of locations where NESC violations were noted by Staff, many of which had more than one code violation.

Staff also performed several spot-checks in 2008 of NESC violations it noted during its 2007 inspections of AmerenIP circuits, to verify the status of AmerenIP’s corrective actions. These spot checks are included in the summary provided as Attachment “R” to this report. As described in Attachment “R”, Staff verified that AmerenIP has performed the work necessary to resolve the prior year NESC violations at all eighteen of those locations chosen for verification.

Railroad crossing and limited access (interstate) highway crossing requirements are defined in Rules 261.D.4.c and Rule 241.C of the 2002 NESC. For most of these crossings which involve crossarm construction, double crossarms or a support assembly of equivalent strength is required at each crossing structure. The violations noted are cases where Staff found a single crossarm support on one or both sides of the railroad or interstate highway crossing. *(Double crossarms have been required for all railroad crossings in Illinois where wooden crossarms and pin-type insulators are used since General Order 30 was adopted on October 12, 1916.)*

Clearance requirements are defined throughout Section 23 of the 2002 NESC, covering many different situations. The NESC clearance violations most commonly cited by Staff involve inadequate heights of the utility's wires above streets, driveways, field entrances, or other terrain. In some cases, Staff cites inadequate vertical or horizontal clearances of the utility's wires from other objects, including buildings or poles the wires are not attached to.

NESC guying requirements are covered in Section 279 of the code. These requirements apply to downguys (from the utility's pole to the ground) and overhead guys (from pole to pole), designed to support the utility's pole from being pulled over by the forces exerted upon it. The most common guying violations are cases where the guy wires are not properly grounded or insulated as required by the code. In these cases, the risk is that members of the public can be exposed to an electrocution hazard if the guy wire becomes energized by contact with an energized wire or device, most commonly due to the guy wire being broken and hanging loosely next to the pole. If the guy wire is properly grounded and contacts an energized wire or device, it will cause the circuit to be de-energized rapidly, thus removing the electrocution hazard. If the guy wire is not grounded, but properly insulated, any energized portion of the guy wire should be out of reach by the public.

The NESC violations Staff noted in AmerenIP's service territory in 2008 are summarized in Attachment "T". Staff recognizes, however, that these are not the only types of NESC violations on the AmerenIP circuits it inspected this year. Some of the deteriorated structures, for example, would not meet the strength requirements of 2002 NESC Table 253-2, footnote 3. This rule relates to how much a wood pole, for example, can be allowed to deteriorate before it must be replaced. As another example, many of the missing guy markers⁵ Staff notes are violations of 2002 NESC Rule 264.E and can have a detrimental effect on reliability as well as public safety.

All of the safety code violations pose a threat to public safety and many of them threaten service reliability as well. Service reliability as well as safety is threatened, for example, when low hanging wires are snagged by a vehicle. This can result in the wires being torn down and/or a crossarm or pole top being broken, causing an interruption of electric service to customers. Similarly, when an unmarked downguy is hit by a vehicle a pole top can be snapped or energized conductors may contact each other or a nearby neutral conductor.

The vintages of most of the noted NESC violations noted by Staff span several decades, but some were on relatively new poles. This indicates to Staff that there has been a lack of adequate training on these issues at various levels at AmerenIP for many years, also including recent years. As shown in Table 7, code violations at fifty-one of the noted locations involve the lack of properly placed guy strain insulators⁶ in ungrounded downguys

⁵ Guy markers are devices placed on the ground end of downguys for the purpose of making the downguys more readily visible to pedestrian or vehicular traffic. The absence of these markers can increase the risk of physical injury to the public and increase the risk of damage to the utility's line the downguy is attached to if the unmarked downguy is hit by pedestrian or vehicular traffic.

⁶ Guy strain insulators are insulating devices placed in guy wires, designed to insulate sections of the guy

or overhead guys, twelve locations involve inadequate clearances, and eight locations involve single wood crossarms supporting AmerenIP's primary⁷ circuit crossings over railroads. Examples of the AmerenIP NESC violations Staff noted this year are shown earlier in this report in Figures 9, 21, 23, 24, 25, 28, 31, 41, 42, 43, and 44.

Ameren has estimated that there may be more than 41,500 NESC violations in the AmerenIP electric system, of which nearly 37,600 are projected to be guying violations. As stated earlier, all of these safety code violations pose a threat to public safety and many of them threaten service reliability as well.

Staff and Ameren worked together to develop Ameren's NESC Corrective Action Plan dated October 31, 2007. In this action plan, Ameren has committed that its normal ongoing process for resolution of all NESC violations will be to correct the violations that pose an imminent danger to public or employee safety within 24 hours and all others within 90 days of its becoming aware of them. The exception to Ameren's normal ongoing process, due to the huge volume of NESC violations known and estimated to already exist in Ameren's electric system, is that a one-time "catch up" program will be allowed for certain violations thought not to be as time critical as most others. This "catch up" program will apply only to downguys or overhead guys that are not properly grounded or insulated, but are fully intact, in good condition, and not expected to fail during the next 5 years. The "catch up" program will allow 12 months from time of discovery for Ameren to resolve these specific cases. This one-time "catch up" program will cease on December 31, 2011, after which time the resolution of all NESC violations will fall under Ameren's normal ongoing process described earlier.

Ameren issued Addendum 1 to the October 31, 2007, NESC Corrective Action Plan on April 11, 2008. In that addendum, Ameren agreed to correct all guying violations that were found in 2007 by December 31, 2008, and to correct all other NESC violations found in 2007 by June 11, 2008. Ameren also agreed to correct all previously grandfathered AmerenIP interstate highway crossing NESC violations by December 31, 2008. *Staff has previously stated that it did not believe AmerenIP's limited approach to addressing the interstate highway crossing violations by "grandfathering" those constructed prior to 1985 was in the best interest of public safety. **Ameren's agreement to correct these previously "grandfathered" interstate highway crossings as described in Addendum 1 provides a reasonable resolution of this issue in the interest of public safety, and Ameren should be commended for adopting the new position.***

wires when other sections may become energized. These insulators are also designed to withstand the strain placed upon them due to the tension in the guy wires in which they are placed.

⁷ The term "primary", as used in this report in relation to electrical facilities, refers to a circuit with a nominal voltage of 2,400 volts or more.

8. Trends in AmerenIP's Reliability Performance

Figure 50 shows a comparison of the company-wide SAIFI values reported by the Illinois utilities for years 2002 through 2007. AmerenIP's company-wide SAIFI performance in 2007 was 45% better than it reported for 2006, and it was the second lowest (second best) of all the reporting Illinois utilities in 2007, bettered only by AmerenCILCO.

Figure 50

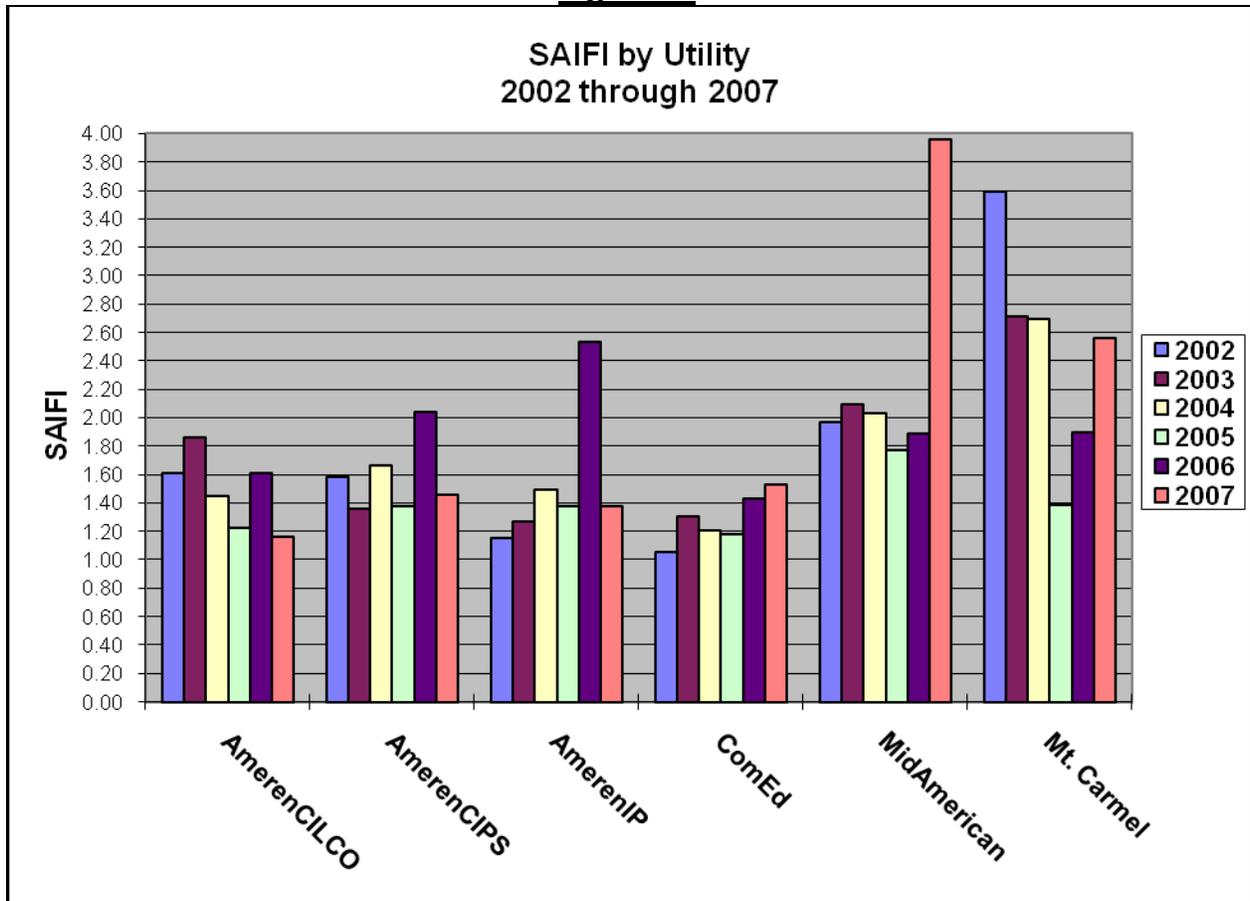


Figure 51

Figure 51 shows AmerenIP's company-wide SAIFI indices over the past ten years. Though this statistic has been erratic over the ten-year period, AmerenIP's reported overall SAIFI for 2007 was about average when compared to seven of the past eight years.

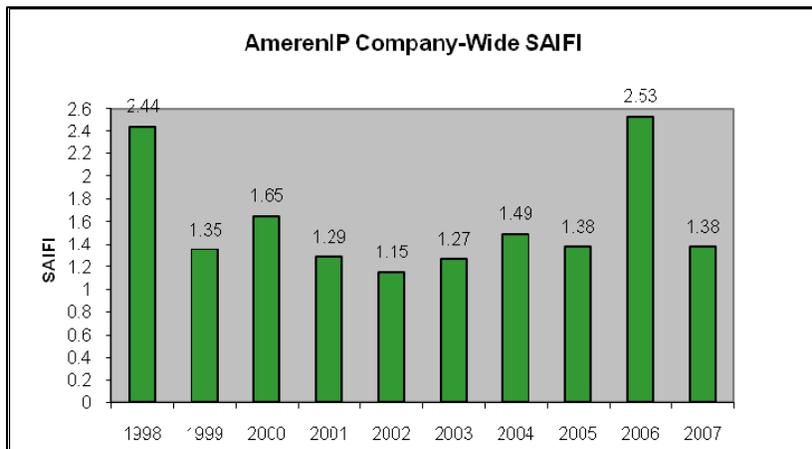


Figure 52 shows a comparison of SAIFI values for each company's single worst performing circuit as reported by the Illinois utilities for years 2002 through 2007. AmerenIP's reported worst-circuit SAIFI for 2007 was significantly better than the value it reported for 2006, the third best of the six reporting Illinois utilities, and just over half of the value reported by ComEd.

Figure 52

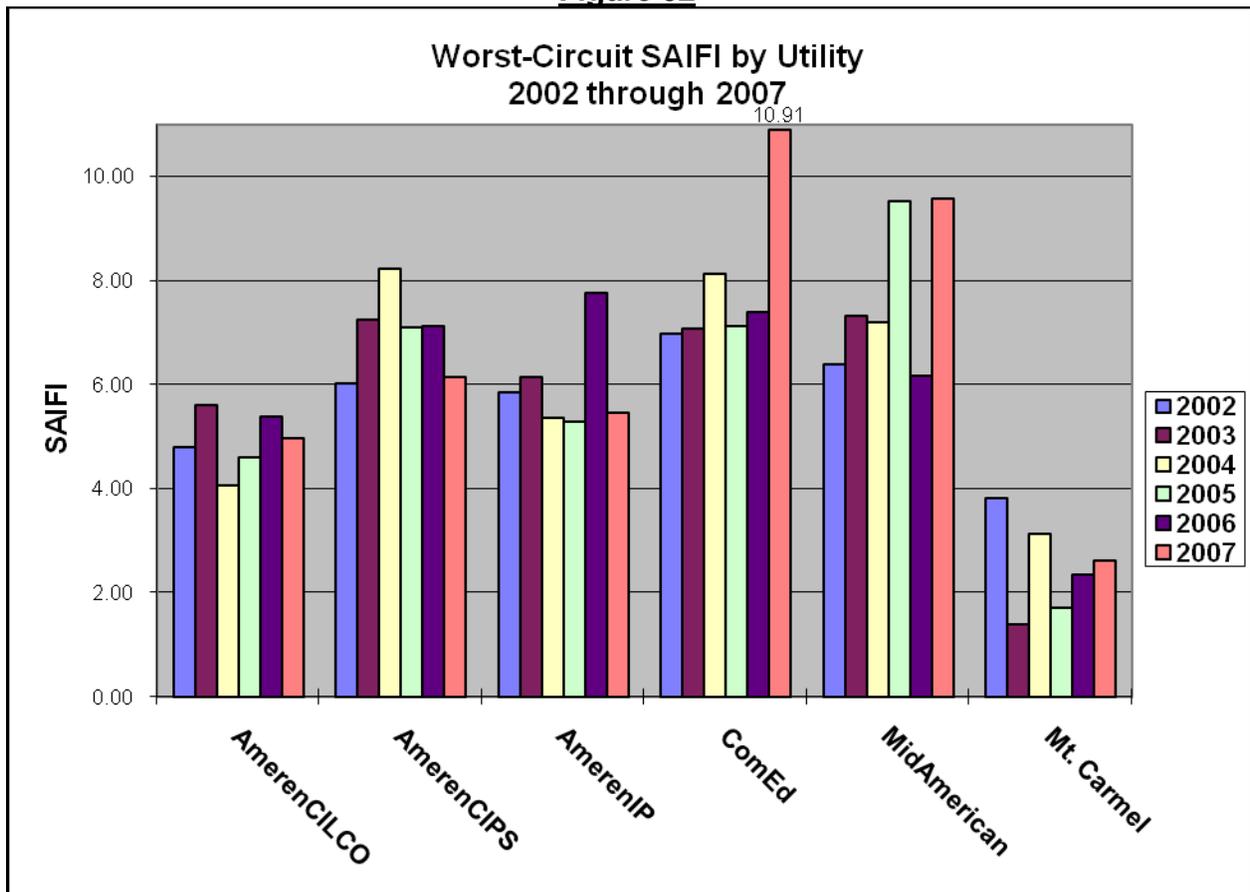


Figure 53

Figure 53 shows the SAIFI index of AmerenIP's single worst performing circuit as reported in each of the last ten years. With a nearly 30% improvement in this statistic from that reported for 2006, AmerenIP's 2007 worst circuit SAIFI was only slightly worse than it reported for years 2004 and 2005.

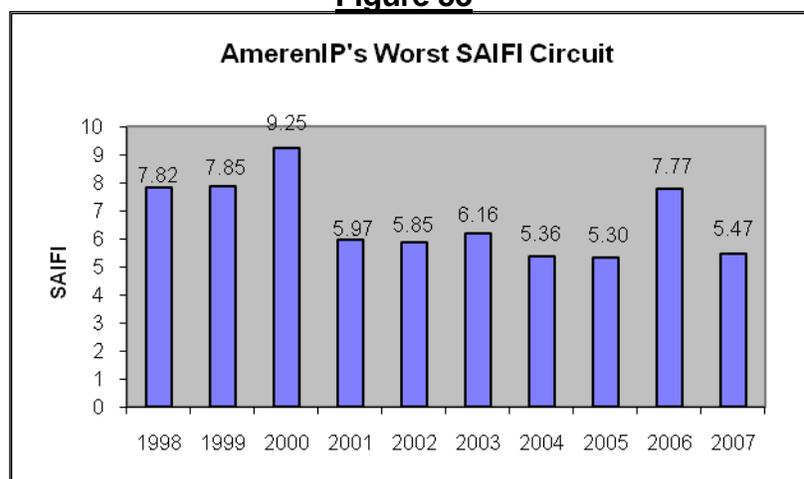


Figure 54 shows a comparison of company-wide CAIDI values reported by the Illinois utilities for years 2002 through 2007. At 346 minutes (5.77 hours), AmerenIP's reported 2007 company-wide CAIDI performance was less than 25% of the 1545 minutes (25.75 hours) it reported for 2006 when widespread major storms were much more of a contributing factor. AmerenIP's 2007 CAIDI value was still the highest in the six-utility group, however.

Figure 54

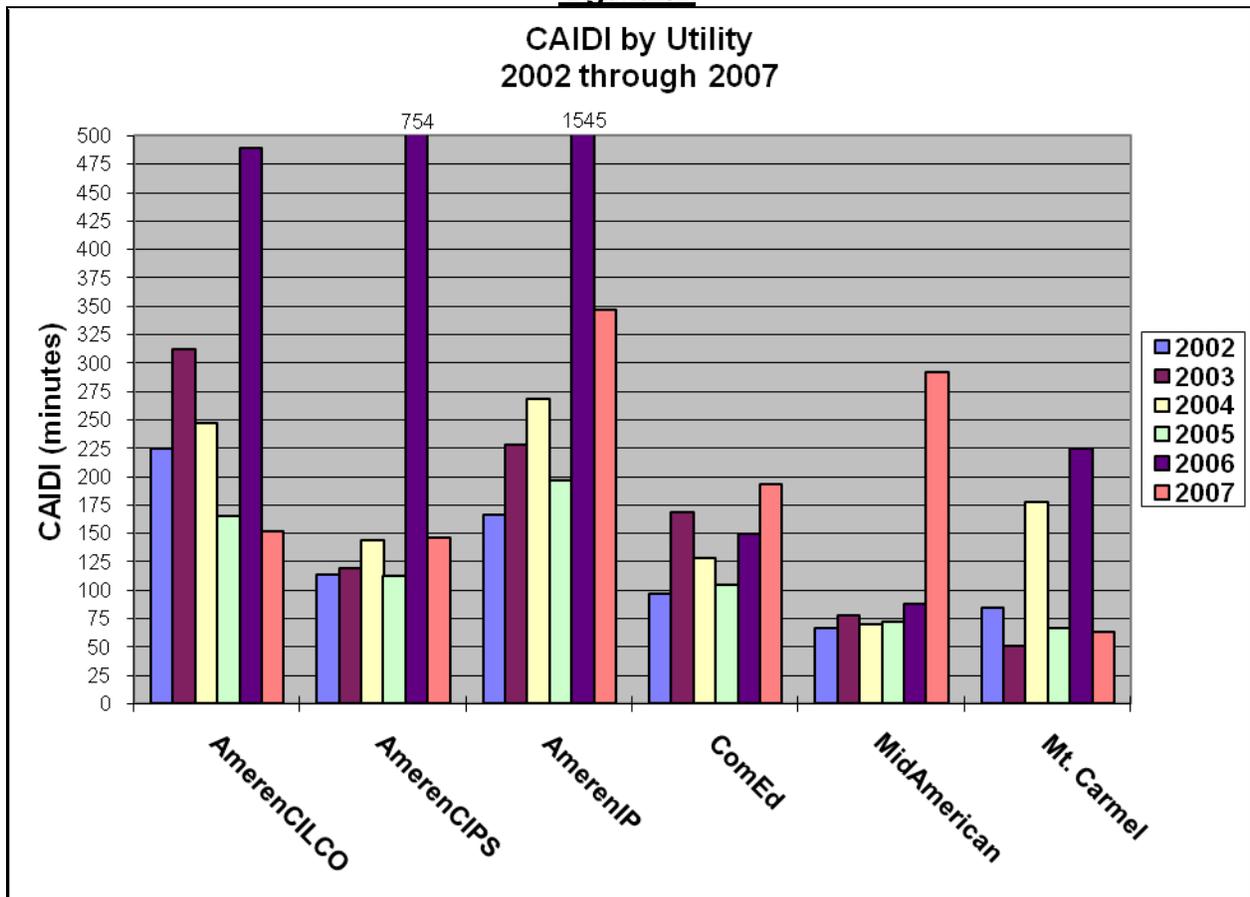


Figure 55

Figure 55 shows AmerenIP's company-wide CAIDI statistics over the past ten years. AmerenIP's 2007 CAIDI value is its second highest of the ten-year period, exceeded only by the much larger value in 2006.

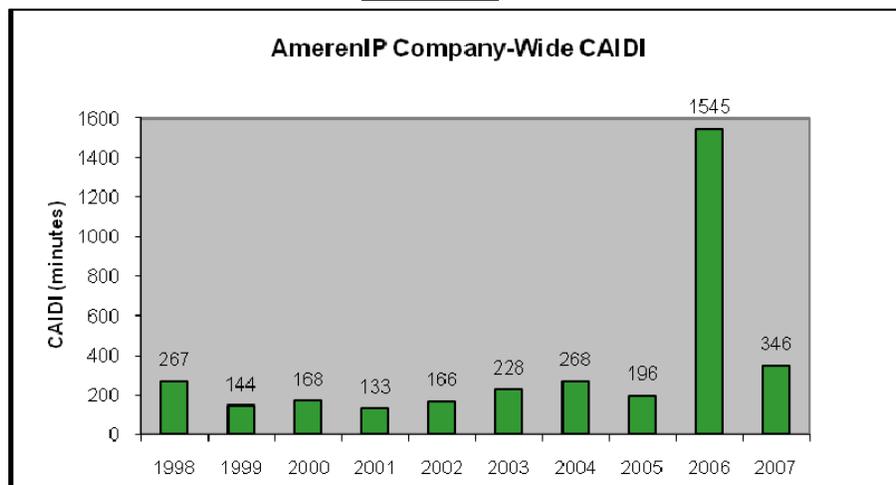


Figure 56 shows a comparison of CAIDI values for each company's single worst performing circuit as reported by the Illinois utilities for years 2002 through 2007. Similar to its worst circuit SAIFI, AmerenIP's worst circuit CAIDI in 2007 was significantly better than in 2006, the third best of the six reporting Illinois utilities, and far better than the worst circuit CAIDIs reported by ComEd, AmerenCIPS, and MidAmerican.

Figure 56

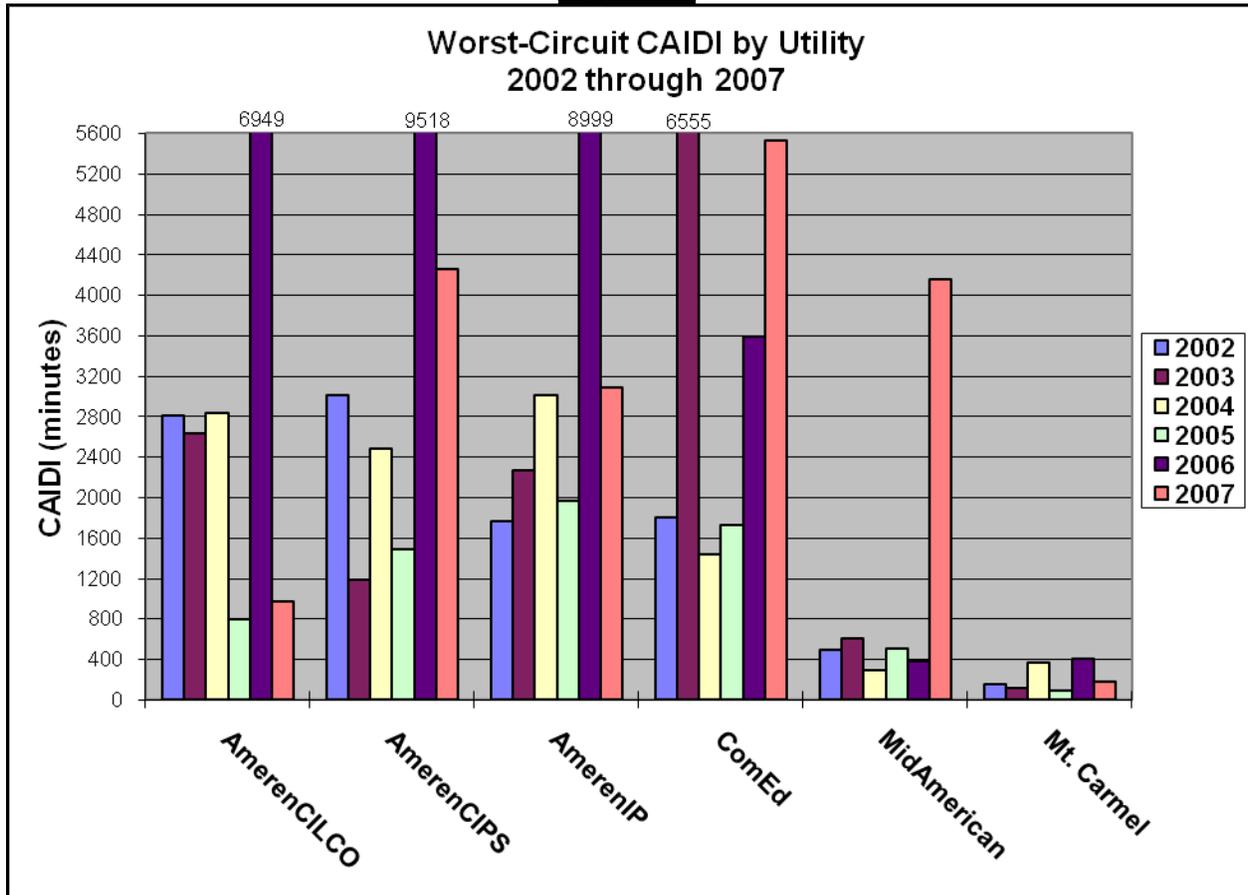


Figure 57

Figure 57 shows the CAIDI index of AmerenIP's single worst performing circuit in each of the last ten years. At 3086 minutes (2.14 days), this statistic is just over 34% of the value reported for 2006 but still the third highest in the past ten year period.

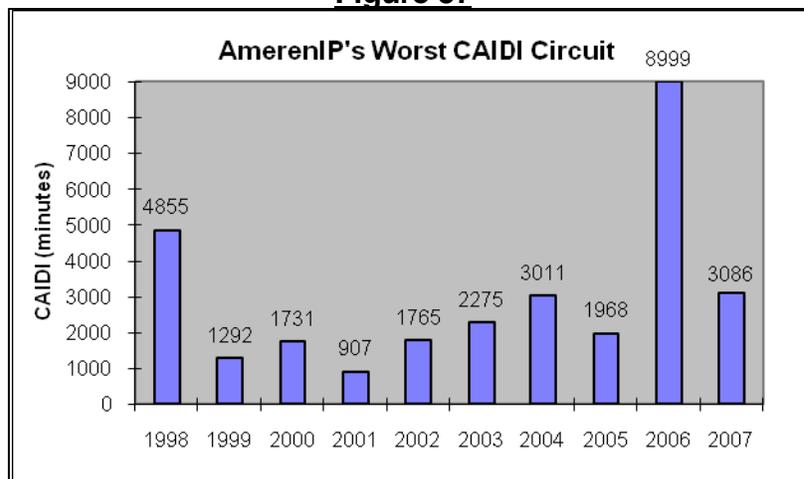


Table 8 shows the number and percentage of AmerenIP customers who experienced no service interruptions or less than four service interruptions for each of years 2000 through 2007. This information is also presented graphically in Figure 58. Note that the number and percentage of AmerenIP customers with no service interruptions in 2007 were more than double what they were in 2006, but still below the levels reported in each of the first five years of this eight-year period. The percentage of AmerenIP customers with less than four interruptions in 2007 improved to a level only slightly below the average of the first six years of the eight-year period.

Table 8
AmerenIP Customers with No Interruptions or Less Than Four Interruptions

Year	Total Customers	Customers with No interruptions	Customers with < 4 interruptions
2000	588,288	196,680 33.43%	505,194 85.88%
2001	589,568	228,055 38.68%	540,960 91.76%
2002	592,741	245,633 41.44%	552,333 93.18%
2003	596,892	234,320 39.26%	544,887 91.29%
2004	600,585	204,181 34.00%	532,373 88.64%
2005	615,272	148,920 24.20%	542,262 88.13%
2006	618,912	90,513 14.62%	430,065 69.49%
2007	622,980	191,786 30.79%	544,005 87.32%

Figure 58

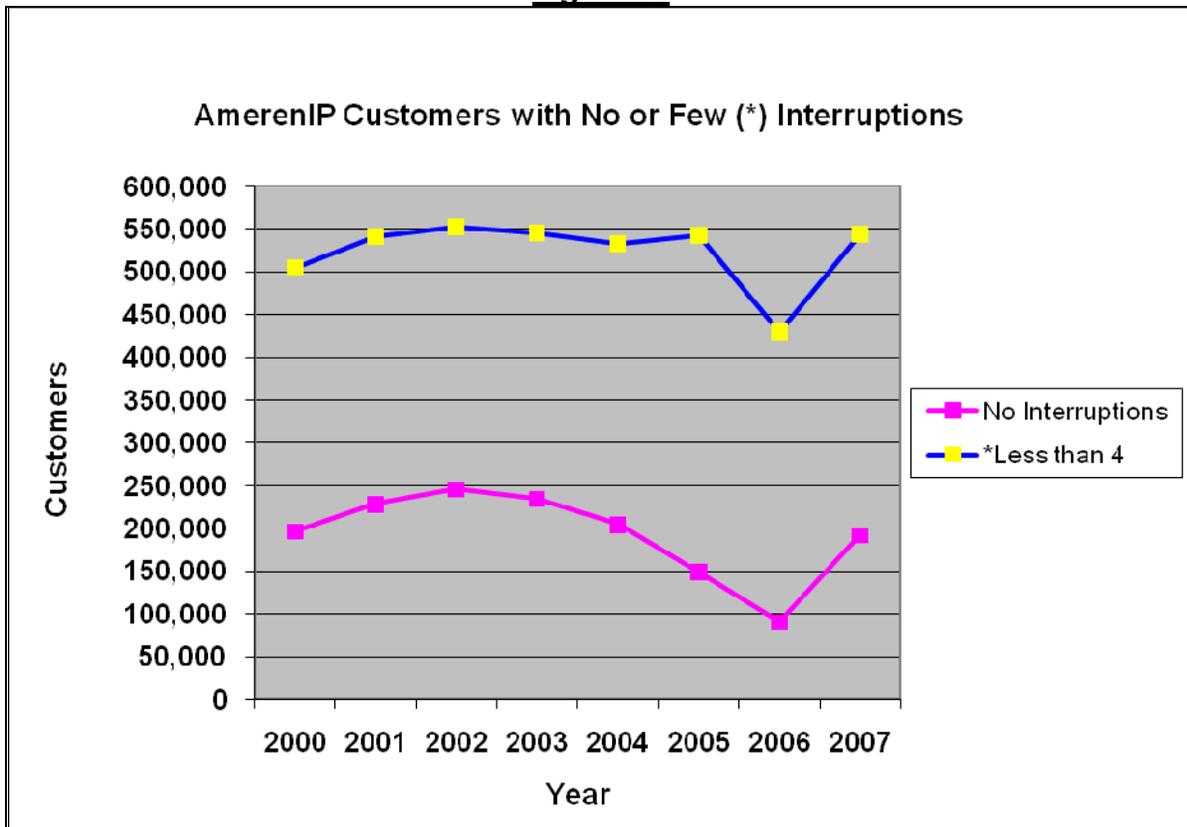


Table 9 shows the number and percentage of AmerenIP customers who experienced more than six and more than ten service interruptions for each of years 2000 through 2007. This information is also presented graphically in Figures 59 and 60. Note that while the numbers of AmerenIP customers in both of these categories in 2007 improved greatly from 2006 when major storms were such a large factor, they were still very high compared to any of the years in the 2001-2005 time period.

Table 9
AmerenIP Customers with More Than Six and More Than Ten Interruptions

Year	Total Customers	Customers with > 6 interruptions		Customers with > 10 interruptions	
2000	588,288	12,093	2.06%	1,391	0.24%
2001	589,568	3,632	0.62%	65	0.01%
2002	592,741	2,731	0.46%	41	0.01%
2003	596,892	4,473	0.75%	99	0.02%
2004	600,585	7,713	1.28%	110	0.02%
2005	615,272	7,111	1.16%	94	0.02%
2006	618,912	47,931	7.74%	3,287	0.53%
2007	622,980	10,970	1.76%	670	0.11%

Figure 59

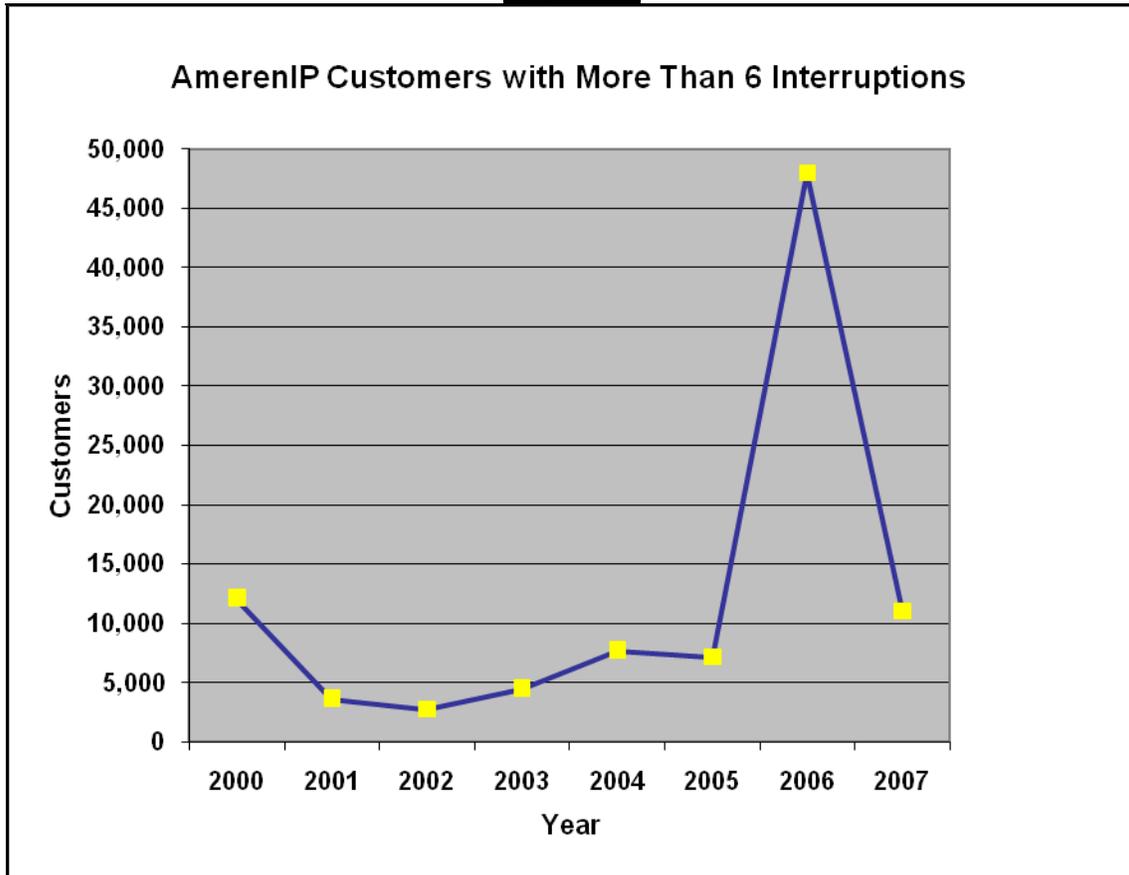
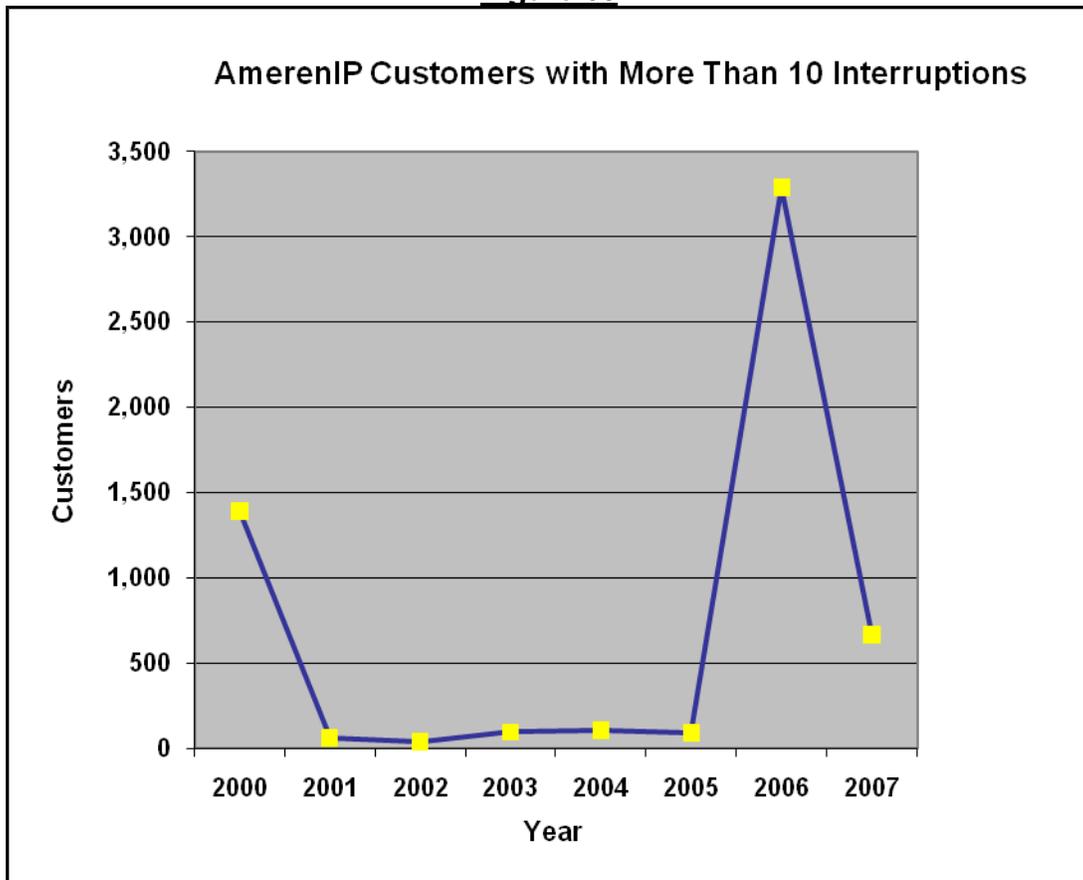


Figure 60



Overall, the statistics provided in AmerenIP's 2007 reliability report indicate a great improvement in the company-wide frequency of interruptions compared to similar data reported for year 2006 when widespread major storms were much more of a contributing factor. AmerenIP's overall SAIFI in 2007 was about average, however, when compared to the same statistic for seven of the past eight years. AmerenIP's reported duration of customer interruptions for 2007 was also much better than it reported for 2006. It was AmerenIP's second highest of the most recent ten-year period, however, exceeded only by the much larger major storm-impacted CAIDI value reported for 2006.

9. AmerenIP's Plan to Maintain or Improve Reliability

Specific plans described in AmerenIP's 2007 annual reliability report to maintain or improve reliability include the following:

- AmerenIP reported that it will continue to install additional tap fuses in 2008, prioritizing individual feeders based on the potential customer interruptions that might be saved by fusing unprotected taps originating from the three-phase backbone.

- Ameren will continue its efforts to better prepare for storms and other emergency events, including additional Storm Dispatcher, Field Checker, and Public Safety Advisors training; improvements in Dispatch Operations; proactive weather monitoring; on-going review and update of listings of critical infrastructure with appropriate emergency response protocols; and training and drills related to the Ameren-Illinois Emergency Response Plan.
- Beginning with 2007 data, a more refined, analytical process has been employed to determine when “weather” provides a truly accurate description of the cause of the outage. Outages will be attributed to weather only when an analysis concludes that weather conditions exceeded the facility design criteria specified by the NESC zoning requirements for Illinois.
- A comprehensive and consistent substation maintenance strategy was implemented in 2007 and will be continued in 2008. This strategy was developed using a reliability-centered maintenance concept to identify individual maintenance tasks that are geared toward preventing specific component failures.
- Several projects stemming from capacity planning will be implemented in 2008 to reduce the risk of equipment failure due to overload, to improve reserve capability and thereby reduce outage duration, and to upgrade facilities to address condition issues.
- Beginning in 2007, the Ameren Illinois Utilities had the technology infrastructure in place to begin implementation of the Circuit Inspection Program, intended to protect public and worker safety and to proactively address problems that might impact system reliability. Facilities included in this program include all subtransmission and distribution circuits having voltages in the range of 4 kV to 69 kV. Beginning in 2008, all distribution circuits in Illinois are inspected on a four-year cycle.

The previously independent program of Pole Inspection and Treatment was incorporated into the Circuit Inspection Program in 2007. Subtransmission and 3-phase distribution poles receive a full groundline inspection for strength assessment on a 12-year cyclical basis. During this 12-year cycle, other distribution poles that are tapped off the 3-phase poles are sounded and selectively bored for strength assessment. Poles failing either type inspection are replaced or reinforced with a C-truss.

- Forestry personnel continue to identify and report circuit deficiencies found while performing tree trimming activities.
- The Ameren Illinois Utilities have instituted a “comprehensive corrective process” to address the many NESC violations found in their electric systems. Electric Standards refresher training was developed and presented at 46 various locations throughout Illinois during 2007 and 2008. Staff and Ameren worked together to

develop Ameren's NESC Corrective Action Plan dated October 31, 2007, to address the timeliness of Ameren's correction of its NESC violations once they are discovered. Ameren issued Addendum 1 to the NESC Corrective Action Plan on April 11, 2008, agreeing to correct all guying violations that were found in 2007 by December 31, 2008. Ameren also agreed to correct all previously grandfathered AmerenIP interstate highway crossing NESC violations by December 31, 2008.

- Device inspections are now incorporated into the daily schedules of routine work. Capacitor banks are inspected annually, while circuit reclosers, voltage regulators, and sectionalizers are inspected twice a year.
- In addition to the four-year tree trimming schedule and mid-cycle patrol program, Ameren Illinois Utilities also implemented a prescriptive trim program in 2007. This program researches tree-related outage information at the circuit level. If the analysis shows poor performance due to tree-related outages, "a field patrol is scheduled to develop a prescriptive vegetation management plan in an effort to minimize tree-caused outages at the circuit level" In 2008, AmerenIP will trim 147 circuits totaling 3672 circuit miles, continuing the company's commitment to maintain a four-year trim cycle. 254 AmerenIP circuits will undergo a mid-cycle patrol and seven circuits will receive a prescriptive trim in 2008.

AmerenIP's tree trimming program has declined somewhat from what it was a few years ago, but Staff still rates it well above average in the state. In addition to maintaining a four-year trim cycle, as AmerenIP has committed to do, it also needs to assure compliance with 2002 NESC Rule 218 by assuring that all trees near its lines throughout its service territory are trimmed such that there will be no tree contacts with its energized primary conductors before it returns to trim them again.

- The Ameren Illinois Utilities take proactive steps to minimize damage to underground facilities. This damage control program provides internal and external education on underground facility damage prevention.
- All new overhead distribution transformers continue to be purchased and installed with animal protection. In-service transformers will be retrofitted with animal protection at the time an outage occurs. AmerenIP also plans to install animal fences at 25 substations in 2008.

Staff noted that additional animal guards are needed on some of the circuits it inspected this year. AmerenIP needs to take a more proactive approach to animal protection in its existing electric circuits, rather than waiting for animal-caused interruptions to occur before installing the needed animal guards.

- Lightning protection is included on all new transformers and is incorporated into the design specifications for lines and substations. The Circuit Inspection Program for all circuits incorporates the following steps:
 - Check for presence of lightning arresters

- Check the condition of lightning arresters on the circuit
- Check for broken grounds
- AmerenIP has planned several system automation projects at several locations in 2008 to improve reliability.
- AmerenIP will implement several projects in 2008 to improve the reliability of its 2007 worst performing circuits.

The actions AmerenIP has taken or reported that it plans to take on its worst performing circuits, including adding sectionalizing fuses on one circuit, seem to address the reported predominant causes of the service interruptions in 2007 reasonably well. Additional work will be required, however, to address circuit problems discovered during Staff's inspections and any subsequent AmerenIP inspections.

AmerenIP's reported annual expenditures for its distribution system, distribution tree trimming, and transmission system for years 2000 through 2007, and the 2008 through 2010 budgets for these categories, are provided in Table 10. This information for the distribution system and for distribution tree trimming is also represented graphically in Figures 61 and 62, respectively. *Note that beginning with the 2005 data (except tree trimming) in Table 10 and in Figure 61, Ameren included certain loadings not previously included in data reported by Illinois Power Company. The data for 2005 and later years are not comparable, therefore, to the data for earlier years.*

Table 10

Year	Distribution (x1,000)			Dist. Tree Trimming (x1,000)	Transmission (x1,000)		
	Capital	O & M	Total		Capital	O & M	Total
2000	\$81,747	\$50,311	\$132,058	\$10,441	\$6,095	\$18,077	\$24,172
2001	\$89,952	\$54,549	\$144,501	\$11,757	\$11,585	\$17,155	\$28,740
2002	\$89,083	\$51,542	\$140,625	\$13,371	\$8,687	\$16,235	\$24,922
2003	\$94,100	\$58,656	\$152,756	\$13,151	\$5,399	\$10,190	\$15,589
2004	\$84,816	\$57,613	\$142,429	\$12,030	\$4,655	\$4,644	\$9,299
2005	\$101,962	\$69,535	\$171,497	\$14,574	\$8,723	\$11,642	\$20,365
2006	\$149,836	\$91,498	\$241,334	\$19,989	\$9,835	\$5,347	\$15,182
2007	\$119,026	\$78,167	\$197,193	\$16,436	\$8,999	\$4,790	\$13,789
2008 Budget	\$141,041	\$93,893	\$234,934	\$16,255	\$10,643	\$6,501	\$17,144
2009 Budget	\$138,167	\$93,310	\$231,477	\$17,873	\$22,322	\$6,238	\$28,560
2010 Budget	\$121,223	\$95,092	\$216,315	\$18,409	\$21,465	\$6,254	\$27,719

Figure 61

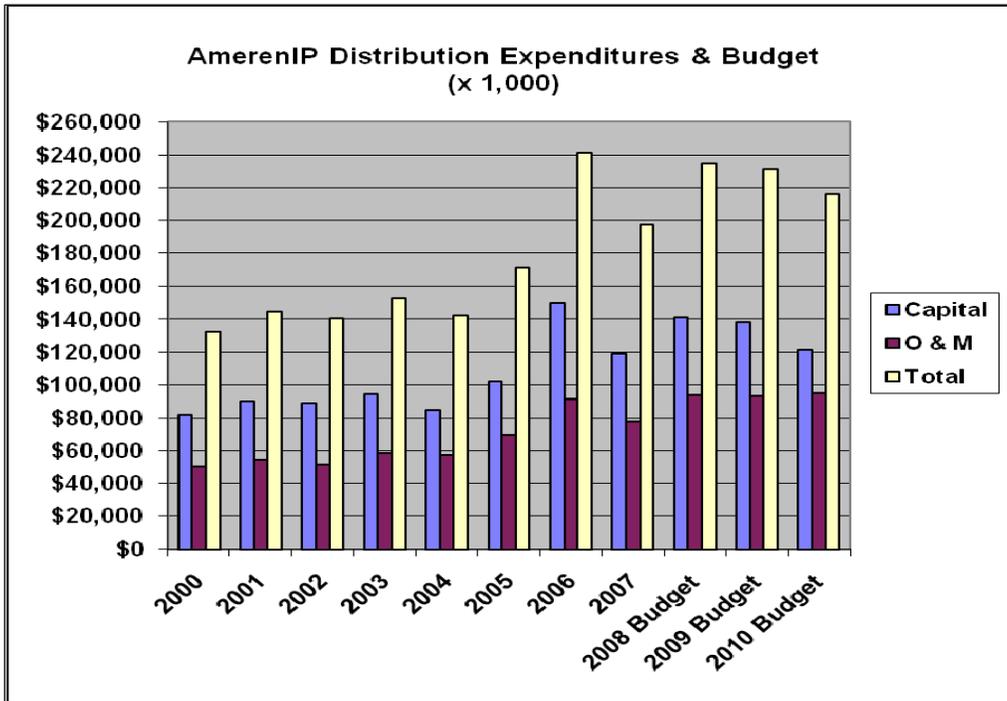
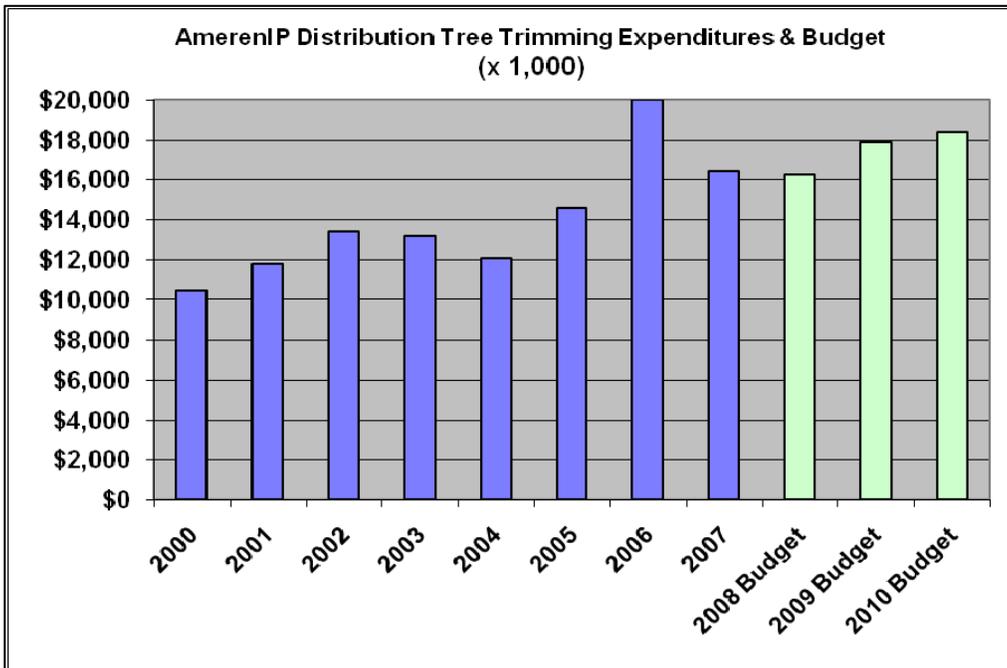


Figure 62



AmerenIP provided a description of actions taken or planned for each of the worst performing circuits listed in its 2007 reliability report. Each of the problems described in the outage history for each circuit was addressed in some way by the described actions taken

or planned. AmerenIP's reported actions taken or planned for each circuit seemed reasonable, but it should also address any additional problems revealed on each of the circuits during Staff's circuit inspections and any subsequent AmerenIP inspections.

10. Potential Reliability Problems and Risks

One of the more common problems Staff has noted during its inspections of AmerenIP circuits in prior years was the need for more lightning arresters in the rural areas of several of the circuits inspected. In many cases, structural lightning damage was evident in the areas of long rural exposure which had infrequent lightning arrester placement. Staff noted fewer cases of lightning damage during its inspections of AmerenIP circuits in 2007 and again this year, but three (possibly four) AmerenIP circuits that Staff inspected this year stood out as needing more lightning arresters in the rural areas. AmerenIP should continue to take a more active role in determining circuits or portions of circuits that are deficient in lightning protection and in correcting those deficiencies.

Animal guarding was generally well done on most of the AmerenIP circuits Staff inspected this year, but more animal guards are needed on five of the circuits Staff inspected. Animals were listed as the cause for 12.52% of AmerenIP's total service interruptions (events) in 2007, including both substation and circuit events. AmerenIP needs to take a more proactive approach to animal protection in its electric circuits, in addition to its substation protection program, rather than waiting for animal-caused interruptions to occur before installing the needed animal guards

AmerenIP listed trees as the cause for 8.40% of the events and 5.11% of the customer interruptions in 2007. Staff performed random tree trimming inspections during 2007 in twenty communities served by AmerenIP, observing that much of the tree trimming was very well done, with some inconsistencies and some particularly bad locations. Staff inspected tree trimming in Jacksonville again in 2008, finding trimming in much of the city to be okay, but many tree conflicts in the west half of town. Tree trimming was well done, overall, on most of the AmerenIP circuits Staff inspected this year, but there were a few exceptions on some of the circuits. AmerenIP needs to assure that adequate tree trimming is being done and properly maintained so that there will be no tree contacts with its energized primary conductors before it returns to trim them again in all parts of its service territory.

Staff noted violations of the National Electrical Safety Code at seventy-one (71) locations on AmerenIP electric circuits this year. This total includes a token number of guying violations, but Staff made no effort to look for many of this type of violation, of which thousands are known to exist on AmerenIP's electric system. (See Section 7E for more details). All of the safety code violations pose a threat to public safety and many of them threaten service reliability as well.

Staff and Ameren worked together to develop Ameren's NESC Corrective Action Plan dated October 31, 2007. In this action plan, Ameren has committed that its normal ongoing

process for resolution of all NESC violations will be for it to correct the violations that pose an imminent danger to public or employee safety within 24 hours and all others within 90 days of its becoming aware of them. The exception to Ameren's normal ongoing process, due to the huge volume of NESC violations known and estimated to already exist in Ameren's electric system, is that a one-time "catch up" program will be allowed for certain violations thought not to be as time critical as most others. This "catch up" program will apply only to downguys or overhead guys that are not properly grounded or insulated, but are fully intact, in good condition, and not expected to fail during the next 5 years. The "catch up" program will allow 12 months from time of discovery for Ameren to resolve these specific cases. This one-time "catch up" program will cease on December 31, 2011, after which time the resolution of all NESC violations will fall under Ameren's normal ongoing process described earlier. Ameren issued Addendum 1 to the October 31, 2007, NESC Corrective Action Plan on April 11, 2008. In that addendum, Ameren agreed to correct all guying violations that were found in 2007 by December 31, 2008, and to correct all other NESC violations found in 2007 by June 11, 2008. Ameren also agreed to correct all previously grandfathered AmerenIP interstate highway crossing NESC violations by December 31, 2008.

AmerenIP should investigate all of the problems noted during Staff's circuit inspections, as well as those discovered by its own inspections, and take appropriate remedial actions addressing any problems on those circuits, whether or not noted by Staff, which can significantly affect service reliability or public safety.

11. Review of AmerenIP's Implementation Plan for the Previous Reporting Period.

AmerenIP reported that all of the planned remedial actions for each of its year 2006 worst performing circuits, as described in its 2006 reliability report, were accomplished. Staff finds the corrective actions taken to be reasonable.

12. Summary of Recommendations

- First, AmerenIP should follow through with its commitment to find and resolve all National Electric Safety Code (NESC) violations throughout its electric system within the timeframes agreed to, and to prevent such occurrences in the first place. All of the safety code violations pose a threat to public safety and many of them threaten service reliability as well. AmerenIP should assure that watching for and noting NESC violations of these and other types are included in its circuit inspection program and that all violations found are resolved in a timely manner.
- Second, AmerenIP should do whatever is necessary to maintain a four-year (minimum) tree trimming cycle that is also in compliance with 2002 NESC Rule 218 throughout its service territory. Staff found much of AmerenIP's tree trimming to be very well done in the communities and on the circuits inspected in 2007 and 2008,

but there were several exceptions. Tree trimming in Jacksonville, for example, has been a perennial problem. AmerenIP needs to assure that all trees near its lines throughout its service territory are trimmed such that there will be no tree contacts with its energized primary⁸ conductors before it returns to trim them again.

- Third, AmerenIP should take a more active role in determining circuits or portions of circuits that are deficient in lightning protection and animal protection, and in correcting those deficiencies.
- Fourth, AmerenIP should investigate all of the problems noted during Staff's inspections of worst performing and other circuits (see Attachments "A" through "R") and take appropriate remedial actions addressing any problems on those circuits, whether or not noted by Staff, which can significantly affect service reliability or public safety.
- Fifth, AmerenIP should follow through with its action plans listed in its Supplemental Report (as a minimum) in an effort to prevent those customers who experienced interruptions in excess of the service reliability targets in each of the last three or more years from exceeding the targets again.
- Sixth, AmerenIP should perform field inspections of all circuits on a regular basis and correct the problems found which can significantly affect reliability or public safety.

⁸ The term "primary", as used in this report in relation to electrical facilities, refers to a circuit with a nominal voltage of 2,400 volts or more.

Attachment "A"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/13-14/08
Circuit:	P47123 (Monmouth, Cameron, Ormonde, Larchland, Berwick, & rural)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, serving a southern portion of Monmouth and a large rural area south and southeast of Monmouth, as well as the communities of Cameron, Ormonde, Larchland, and Berwick. There are many new poles and crossarms scattered throughout the circuit. About one mile of the circuit is scheduled for reconductoring in 2008 in a line section where Staff noted many conductor splices and patch rods (in 11 spans). Very few animal guards have been installed in Cameron, but animal guarding on the rest of the circuit looked okay. Staff noted lightning arrester problems at 14 locations, and 26 missing guy markers. Mapping errors were noted on 6 circuit maps. One NESC guying violation was noted, though Staff did not look for them.			
Map No.	Item Description	Photo(s)	Location
1 of 95	Missing guy marker		Corner of Rds. 400E & 1300N (Ponemah Rd., CH 18).
2	Lightning damaged pole top		3rd pole north of Sta. 12758 on Rd. 450E.
3	Missing guy marker		Corner of Rds. 450E & 1300N (Ponemah Rd., CH 18).
4	Tree very close to primary		Just west of Sta. 12752 on Rd. 1300N (Ponemah
4	Split pole top		1st pole west of Sta. 12753 on Rd. 1300N.
4	Lightning damaged pole top		4th pole east of Rd. 500E on Rd. 1300N.
6	Broken ground wire on pole		7th pole east of Rd. 500E on Rd. 1300N.
6	Wood pin through arm (field side primary)		10th pole east of Rd. 500E on Rd. 1300N.
6	Badly shell rotted pole, bad pole top, roadside pin through arm, & broken ground wire	118-1817	11th pole east of Rd. 500E on Rd. 1300N.
6	Badly lightning damaged pole top	1818	13th pole east of Rd. 500E on Rd. 1300N.
7	Lightning damaged pole top		2nd pole east of Sta. 12407 on Rd. 900N.
7	Windshake (lightning damaged?) pole		3rd pole east of Sta. 12407 on Rd. 900N.
7	Badly shell rotted pole		4th pole east of Sta. 12407 on Rd. 900N.
9	Broken neutral spool		3rd pole north of Rd. 1200N on Rd. 600E.
10	Split pole top, primary insulator coming off pin, & neutral falling off pole	1815, 1816	1 span west of Rd. 600E on Rd. 1300N (CH 18).
10	Wood pin through arm (road side primary)		3rd pole east of Sta. 12834 on Rd. 1300N.
11	Missing guy marker		1st pole north of Sta. 15714 (at the tap to Sta. 24560) on Rt. 67.
11	Missing primary downguy		At the south end of the primary along Rt. 67 (1st pole south of Sta. 12370).
12	Two missing guy markers		At both ends of the tap to Sta. 10207, going east from Rt. 67.
14	Missing primary downguy		On Rt. 67 at the tap to Sta. 10202.
16	Badly shell rotted pole		1st pole west of Sta. 12839 on Rd. 1200N.
16	Missing guy marker		On Rd. 1200N at the tap to Sta. 15760.
20	Broken 69 kV ground wire (above 12 kV underbuild)	1813, 1814	4 spans south of Rd. 1500N on Rt. 67.
20	Broken strand in single-phase 6A CWC primary	1812	3rd span west of Sta. 16404, just east of 69 kV ABS # AB1132 (Str. 2), on Rd. 1500N.
22	Two missing guy markers		On both sides of Rd. 1200N at Sta. 12841.
24	Missing guy marker		At the east end of the primary on Rd. 1300N (guy stub pole east of Sta. 18308).
26	Missing guy marker		Corner of Rt. 67 & Rd. 1600N at the tap going west (shown wrong on map).
26	Two missing guy markers		Corner of Rt. 67 & Rd. 1600N at the tap going east (shown wrong on map).
27	Missing road-side steel brace		1st pole south of Sta. 10219 on Rt. 67.
30	Missing primary downguy		At the west end of the primary on W. 8th Ave., Monmouth.
33	Missing guy marker		Corner of S. 6th St. & E. 11th Ave., Monmouth.
33	Trees very close to primary		Just east of S. 6th St. in the tap to Sta. 25864, Monmouth.
34	Missing guy marker		Corner of S. 4th St. & E. 10th Ave., Monmouth.
36	Badly shell rotted pole		Rd. 800E at Sta. 12798.
36	Two missing guy markers		Corner of Rds. 800E & 1500N (mapped incorrectly).
36	Shell rotted pole		1 span north of Rd. 1500N (mapped incorrectly) on Rd. 800E.

(continued)

Attachment "A" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/13-14/08
Circuit:	P47123 (Monmouth, Cameron, Ormonde, Larchland, Berwick, & rural)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Map No.	Item Description	Photo(s)	Location
36	Shell rotted pole with split top		4 spans north of Rd. 1500N (mapped incorrectly) on Rd. 800E.
36	Missing guy marker		East of Rd. 800E at the line corner on Rd. 1500N.
36	Badly shell rotted pole		1 span west of the tap to Sta. 12799 on Rd. 1500N.
37	Missing guy marker		At Sta. 12797 on Rd. 800E.
37	Lightning arrester blown apart & disconnected from primary (road side)	1832, 1833	6 spans east of Rd. 800E on Rd. 1600N.
38	Hanging steel brace (road side)		4 spans north of tap to Sta. 17952 on Rd. 800E.
40	Missing guy marker		At Sta. 12800 on Rd. 1500N.
40	Hanging steel brace (field side)		2nd pole east of Sta. 12800 on Rd. 1500N.
40	Split pole top		3rd pole east of Sta. 12800 on Rd. 1500N.
41	Broken jumper to top of center lightning arrester	1831	4th pole east of Sta. 12795 on Rd. 1600N.
45	Missing guy marker		1 span east of Rd. 900E at the east end of the tap 1 span north of Sta. 12794.
45	Badly deteriorated co-op 3-phase crossarm above AmerenIP 3-phase circuit	1829, 1830	3rd pole south of Sta. 12793 on Rd. 900E (CH 17).
45	Center lightning arrester disconnected from circuit		1 span east of Rd. 900E (CH 17) on Rd. 1600N.
50	Badly lightning damaged pole		3 spans north of Rd. 1400N on Rd. 1000E.
51	Neutral pin through crossarm (field side)		4th pole east of Sta. 12812 on Rd. 1500N.
52	Blown lightning arrester (road side)		8th pole west of Sta. 12791 on Rd. 1600N.
52	Blown lightning arrester (center)		3rd pole west of Sta. 12791 on Rd. 1600N.
55	Badly lightning damaged pole		1st pole south of Sta. ???01 (illegible at edge of map) on Rd. 1000E.
56	Neutral pin through crossarm		2nd pole east of Sta. 12820 on Rd. 1500N (CH 6).
57	Shell rotted pole		1st pole south of line fuse 123-24 on Rd. 1000E.
57	Two hanging wood braces	1811	1 span west of Rd. 1000E on Rd. 1600N.
61	Poletop pin coming off pole (bottom bolt missing & top bolt missing its nut & coming out of pole)-- primary conductor about to fall (advised AmerenIP 2/20/08 ~8:30 am).	1822, 1823	1st pole east of Sta. 12822 on Rd. 1400N.
61	Lightning damaged crossarm	1824	4th pole north of Rd. 1400N on Rd. 1100E (CH 6).
61	Center lightning arrester disconnected from circuit (hot tap connector off stirrup)	1825	4th pole south of Sta. 12824 on Rd. 1100E (CH 6).
61	Center lightning arrester disconnected from circuit & connected to neutral	1826	1st pole south of Sta. 12824 on Rd. 1100E (CH 6).
62	Blown lightning arrester (field side)		2nd pole south of Rd. 1500N on Rd. 1100E.
65	Blown lightning arrester (field side)		2nd pole west of Sta. 12826 on Rd. 1400N (CH 6).
67	Center lightning arrester disconnected from circuit (hot tap connector hanging down)		6th pole south of Sta. 12781 on Rd. 1100E.
67	Field side lightning arrester missing, center lightning arrester disconnected from circuit (hot tap hanging down), & road side lightning arrester blown	1827, 1828	3rd pole south of Sta. 12781 on Rd. 1100E.
69	Badly shell rotted pole	1820, 1821	2nd pole east of Sta. 12831 in the tap going west from Rd. 1200E.
70	Code guying violation (NESC 279.A.2): Ungrounded 69 kV downguy without strain insulator properly placed below energized 12 kV conductors (existing wooden guy strain insulator is too high).	118-1819	1st pole east of Rd. 1200E (69 kV Str. 293) on Rd. 1400N (CH 6), southwest of Cameron.
71	Roadside lightning arrester missing (blown apart)		2nd pole west of tap to Sta. 12779 on Rd. 1600N.
71	Missing guy marker		At Sta. 12779 just north of Rd. 1600N.
75	Missing guy marker		On Rd. 1400N (CH 6) at the tap to Sta. 12863.
77	Missing guy marker		At Sta. 24635 at the east end of the circuit on Berwick Rd., Berwick.

(continued)

Attachment "A" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/13-14/08
Circuit:	P47123 (Monmouth, Cameron, Ormonde, Larchland, Berwick, & rural)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Map No.	Item Description	Photo(s)	Location
77	Trees into primary		Just west of 131st St. on Berwick Rd., Berwick.
84	Lightning damaged pole top (& no crossarm braces)		3 spans west of Rd. 1400E (CH 15) on Rd. 1600N.
84	Four spans with many splices & patch rods in primary phase conductors (3 to 14 splices per span)--to be reconducted in 2008 because of rusted steel core.		Along Rd. 1400E (CH 15) south of the tap to Sta. 27845).
85	Six spans with many splices & patch rods in primary phase conductors (3 to 15 splices per span)--to be reconducted in 2008 because of rusted steel core.		Along Rd. 1400E (CH 15) in 1 span north & 5 spans south of Rd. 1675N.
86	Fifteen splices & patch rods in the primary phase conductors in 1 span of primary (no evidence of trees)		1st span north of Sta. 12851 on Rd. 1400E (CH 15).
86	Missing guy marker		1st pole west of Pearl St. on the north side of South St., Cameron.
86	Tree close to primary		In the 1st span west of Pearl on Vine St., Cameron.
87	Missing guy marker		At the corner of Quincy & Morris Sts., Cameron.
87	Soft maple tree into single-phase primary		Just north of Warren St. on Nutt St., Cameron.
89	Broken anchor rod for primary downguy (primary downguy & ~6 ft. of rusted anchor rod are strapped to the pole).	1808, 1809	At Sta. 19582 on Railroad St., Cameron.
95	Missing guy marker		1st pole north of CH 16 (Rd. 1750N) in the tap to Sta. 26442.

Attachment "B"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/14/08
Circuit:	P47169 (Monmouth)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, serving a central and eastern part of the City of Monmouth. Staff noted only a few tree problems, and animal guards were plentiful. Few structural problems were noted. Staff noted missing guy markers at 12 locations, a large number for a circuit this size.			
Map No.	Item Description	Photo(s)	Location
1 of 11	Missing guy marker		At Sta. 20389 on S. 5th St. south of E. 5th Ave.
1	Capacitor bank fuse open (field side)		Capacitor Bank 169-2 on the south side of E. 6th Ave. west of S. 5th St.
2	Deteriorated pole top		Pole between Stas. 19194 & 25772 on S. 7th St., south of E. 10th Ave.
2	Missing guy marker		At Sta. 11814 on S. 9th St. south of E. 10th Ave.
2	Missing guy marker		At Sta. 11810 on S. 10th St. at the alley south of E. 8th Ave.
3	Tree limb hanging on secondary conductor		S. 6th St. just north of Sta. 11805, north of E. 6th Ave.
3	Small broken tree limb on spacer cable primary		S. 6th St. just north of Sta. 11805, north of E. 6th Ave.
3	Trees close to primary		S. 7th St. just south of E. 2nd Ave.
3	Shell rotted pole		1 span south of E. 3rd Ave. on S. 9th St.
3	Tree very close to primary		In the 1st span west of S. 10th St. on E. 3rd Ave.
4	Missing guy marker		1st pole north of Sta. 19192 on S. 7th St.
5	Missing guy marker		On the guy stub pole on the east side of S. 11th St. north of Fairway Dr.
6	Missing guy marker		1st pole north of Sta. 19073 at the tap going west to Sta. 15380, north of Old US Rt. 34.
8	Missing guy marker		On 192 Ave. at the 2nd pole west of the tap to Sta. 19681.
8	Missing guy marker		On 192 Ave. at the tap to Sta. 19681.

(continued)

Attachment "B" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/14/08
Circuit:	P47169 (Monmouth)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Map No.	Item Description	Photo(s)	Location
8	Missing guy marker		On 192 Ave. at the 1st pole east of the tap to Sta. 19681.
9	Missing guy marker		At Sta. 11574 on the north side of Old US Rt. 34.
10	Broken neutral spool		On 192 Ave. at the 3rd pole west of the tap to Sta. 13449.
10	Split pole top		On 192 Ave. at the 2nd pole west of the tap to Sta. 13449.
10	Missing guy marker		On 192 Ave. at the tap to Sta. 13449.
10	Hanging steel brace (road side)		2nd pole north of 192 Ave. in the tap to Sta. 13449.
10	Missing guy marker		At Sta. 13449 at the north end of the tap, north of 192 Ave.
10	Badly shell rotted pole		On 192 Ave., 1 span west of the tap to Sta. 10148.

Attachment "C"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/20/08
Circuit:	R93351 (Wanda, Roxana--not Wood River as labeled by AmerenIP--, & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was a small AmerenIP worst performing CAIDI 12 kV circuit in 2006, serving Wanda, an eastern part of Roxana, and a small rural area near those communities. Staff noted no circuit problems during its inspection, but was only able to inspect the main overhead feeders. A considerable portion of the circuit is either underground, in back easements, or otherwise inaccessible. Staff noted many animal guards on the parts of the circuit it inspected, but more may be needed. There were mapping errors on page 6 of the circuit maps provided.			
Map No.	Item Description	Photo(s)	Location

Attachment "D"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/20/08
Circuit:	M78322 (Granite City)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was an AmerenIP next-worst performing 4 kV circuit in 2007, serving a portion of Granite City. This circuit was also an AmerenIP worst performing CAIDI circuit in 2000. Some of the circuit was not inspected in alleys that were not drivable. Some animal guards were noted, but more are needed. Staff noted no structural problems.			
Map No.	Item Description	Photo(s)	Location
1 of 3	Missing guy marker		At the end of the circuit just west of Moro Ave. on Pontoon Rd.
2	Pine tree close to primary		Just south of Garfield Ave. in the alley west of Franklin Blvd.

Attachment "E"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/20/08
Circuit:	M78324 (Granite City)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, serving a portion of Granite City and repeating as a worst performing circuit from 2006. Staff noted no circuit problems, but only inspected about half or less of this already small circuit due to much of it being in back easements or underground. Some animal guards were noted, but more are needed.			
Map No.	Item Description	Photo(s)	Location

Attachment "F"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/20/08
Circuit:	Q21293 (Fairview Heights, O'Fallon, & rural Collinsville)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was an AmerenIP next-worst performing 12 kV circuit in 2007, repeating in that category from 2006, and was a worst performing CAIDI circuit in 1999. The circuit serves portions of Fairview Heights, O'Fallon, and rural Collinsville. About half of the circuit is underground and several sections are cross-country and inaccessible. Staff noted several "extra" lightning arresters and several animal guards, but more animal guards are needed. Errors were noted on two of the circuit maps provided.			
Map No.	Item Description	Photo(s)	Location
1 of 28	Trees into primary		Along O'Fallon Ave. in the last span at the west end of the circuit.
3	Split (lightning damaged) wood brace (field side)	118-1834, 1835	At Sta. 27394 on O'Fallon Ave. west of Rt. 159.
6	Missing guy marker		At Sta. 18710 near the end of the spur feeding north from Milburn School Rd.
6	Blown lightning arrester (center phase)		On Milburn School Rd., 4 spans east of the tap to Sta. 30323.
10	Lightning damaged pole		2 spans north of Milburn School Rd. in the tap to Sta. 16724.
18	Trees close to primary		South of Milburn School Rd. in the 1st span of the tap to Sta. 10483.
19	Cedar trees very close to primary		3rd span northwest of Sta. 25017 on Pausch Rd.
20	Blown lightning arrester (at transformer)		Sta. 16720 at the south end of the tap feeding south from Bethel School Rd.

Attachment "G"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/28/08
Circuit:	M37191 (Galesburg & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, with the highest SAIFI (5.47) of all AmerenIP circuits in 2007. The circuit serves a northeastern portion of Galesburg and a rural area east and northeast of Galesburg. There are several inaccessible and cross-country sections, representing a small portion of the circuit. Animal guarding was very well done, especially in the part of the circuit in the City of Galesburg. Staff noted several "extra" lightning arresters in the rural areas. Errors were noted on three of the circuit maps provided. Missing guy markers were noted at 21 locations.			
Map No.	Item Description	Photo(s)	Location
1 of 40	Broken spacer cable spacer		Just west of N. Pearl St. on E. Losey St., Galesburg.
1	Deteriorated & split wood pin crossarm	118-1838, 1839	1st pole south of Sta. 18946 on Willard St., Galesburg.
1	Small tree limb on single-phase primary		Just east of Beecher St. on Greenleaf St., Galesburg.
1	Missing guy marker		At Sta. 25532 on Beecher St. south of Dudley St., Galesburg.
3	Missing guy marker		On the guy stub pole on the west side of Lincoln St. at North St., Galesburg.
3	Missing guy marker		At Sta. 10811 on Blaine Ave., Galesburg.
3	Low neutral clearance above ground. AmerenIP measured neutral clearances in this area on 3/19/08 to range from 12' 1" to 13' ½" (9.5 ft. minimum clearance allowed if area is subject to pedestrians & restricted traffic only; otherwise 15.5 ft. required).	118-1837	1st full span north of Greenleaf St. on Morton Ave. (platted street), Galesburg.
3	Shell rotted pole		At Sta. 20158 on Arnold St., 1 span north of E. Losey St., Galesburg.
4	Low neutral clearance above ground. AmerenIP measured neutral clearances in this area on 3/19/08 to range from 12' 1" to 13' ½" (9.5 ft. minimum clearance allowed if area is subject to pedestrians & restricted traffic only; otherwise 15.5 ft. required).		1st span north of Dudley St. on Morton Ave. (platted street), Galesburg.
5	Two broken spacer cable spacers		Just north of Grove St. on N. Farnham St. (north of Irwin St. substation), Galesburg.

(continued)

Attachment "G" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	2/28/08
Circuit:	M37191 (Galesburg & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Map No.	Item Description	Photo(s)	Location
7	Missing guy marker		1st pole south of E. Fremont St. in the tap to Sta. 25322 (west of I-74), Galesburg.
8	Missing guy marker		At Sta. 10558 east of Old Rt. 34 & northeast of I-74.
8	Missing guy marker		At Sta. 23636 east of Old Rt. 34.
8	Missing guy marker		At Sta. 27015 southwest of Knox Co. Hwy. 9.
12	Badly burned crossarm	1840	2 spans west of Fairway Rd. on CH 7.
13	Evergreen trees close to primary		1st span east of CH 9 in the tap to Sta. 22151.
15	Very large (approximately 5 ft. diameter) hollow tree endangering 3-phase primary. Void in tree is approximately 4 ft. deep.	1841, 1844, 1845	On CH 7 just east of the tap to Sta. 26137, east of Rd. 700E.
17	Missing guy marker		At Sta. 10091 just east of Rd. 700E on Rd. 1850N.
20	Missing guy marker		On Rd. 800E at the tap to Sta. 11031.
20	Missing guy marker		At Sta. 11031 east of Rd. 800E.
21	Missing guy marker		On Rd. 800E at the tap to Sta. 14388, north of Rd. 1800N.
21	Missing guy marker		At Sta. 14388 east of Rd. 800E.
22	Missing guy marker		5th pole west of Rd. 800E on Rd. 1850N.
22	Missing guy marker		6th pole west of Rd. 800E on Rd. 1850N.
25	Hanging steel brace (field side)		2nd pole east of Sta. 14390 on Rd. 1850N.
25	Evergreen trees close to primary		North of Rd. 1850N in the span serving Sta. 21525.
26	Missing guy marker		At the west end of the circuit on Rd. 1950N, west of Rd. 850 E (4 spans of primary not mapped).
29	Missing guy marker		4 spans south of Rd. 1800N on Rd. 875E.
30	Missing guy marker		At Sta. 14375 on the east side of Rd. 900E.
31	Missing guy marker		1st pole east of Rd. 900E on Rd. 2000N.
36	Missing guy marker		West of Timberview Ln. 1 span south of the tap to Sta. 23507.
36	Trees close to primary		Several places along Timberview Ln. from the tap to Sta. 14360 to the tap to Sta. 26436.
38	Two woodpecker holes in pole top & pole top extension leaning	1846	1st pole east of Sta. 14367 on Rd. 1950N.
39	Two missing guy markers		At Sta. 14930 on Rd. 2030N.

Attachment "H"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/10 & 3/11/08
Circuit:	Q32170 (Oquawka & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, serving Oquawka and a large rural area to the north and east. Many sections of the circuit are cross-country and inaccessible. Animal guarding was very well done in and near the City of Oquawka, and Staff noted many new poles and crossarms scattered throughout the circuit. Several scattered tree clearance issues were noted. More lightning arresters are needed in the rural areas. Staff noted seventy-two (72) missing guy markers, and there are probably many more. Errors were noted on fourteen of the circuit maps provided.			
Map No.	Item Description	Photo(s)	Location
1 of 107	Missing guy marker		1 span south of Lincoln St. on Rt. 164, Oquawka.
1	Trees close to primary		Calhoun & 6th Sts., Oquawka.
1	Missing guy marker		At Sta. 17497 east of 5th St. (south of Schuyler St.), Oquawka.
1	Missing guy marker		At Sta. 18277 on 4th St. south of Schuyler St., Oquawka.
1	Missing guy marker		At Sta. 11845 on 3rd St. south of Schuyler St., Oquawka.
1	Missing guy marker		1st pole north of Sta. 15396 along C B & Q railroad, Oquawka.
1	Missing guy marker		At Sta. 11843 just north of Pike St. on Front St., Oquawka.

(continued)

Attachment "H" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/10 & 3/11/08
Circuit:	Q32170 (Oquawka & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Map No.	Item Description	Photo(s)	Location
1	Missing guy marker		At Sta. 23053 just south of Schuyler St. on First St., Oquawka.
1	Trees close to primary		In the alley between 2nd & 3rd Sts., just north of Sta. 20203 (south of Warren St., Oquawka.
2	Trees close to primary		Just south of Sta. 19778 on 1st St. south of Edwards St., Oquawka.
2	White pine tree burned by primary		Just north of Sta. 11830 on 1st St. north of Edwards St., Oquawka.
4	Evergreen trees close to primary		Just north of Sta. 26361 in the spur going south from Lincoln St., Oquawka.
4	Broken primary downguy		1 span north of Sta. 26361 in the spur going south from Lincoln St., Oquawka.
4	Broken wood brace (roadside)	118-1855	Lincoln St. just west of 10th St., Oquawka.
4	Missing guy marker		At Sta. 10311 in the alley west of 10th St., south of Lincoln St., Oquawka.
4	Missing guy marker		At Sta. 25674 on 9th St. north of Lincoln St., Oquawka.
4	Missing primary downguy		At Sta. 20771 on 11th St. north of Calhoun St., Oquawka.
4	Missing guy marker		1 span south of Sta. 22025 on a street not labeled on map (south of Pike St.), Oquawka.
4	Trees close to primary		North of Sta. 11853 on 7th St. south of Warren St., Oquawka.
4	Missing guy marker		1st pole west of 9th St. on Knox St., Oquawka.
4	Tree into primary		North of Sta. 19590 on 9th St. south of Pike St., Oquawka.
4	Trees very close to primary		On 10th St. between Rt. 164 & Warren St., Oquawka.
4	Trees close to primary		2nd span east of Sta. 27309 on Warren St., Oquawka.
4	Missing guy marker		1 span north of Warren St. in the tap to Sta. 21241, Oquawka.
5	Missing guy marker		At Sta. 20576 east of 9th St., Oquawka.
5	Trees close to primary		East of 4th St. along Fulton St., Oquawka.
6	Missing guy marker		At Sta. 11828 north of Green St. (west of C B & Q railroad), Oquawka.
8	Broken primary downguy		On the guy stub pole on the north side of CH 3, 2 spans east of Rd. 1350E.
8	Two missing guy markers		Corner of CH 3 & Rd. 1350E.
8	Trees into primary		Just north of Lincoln St. in the tap to Sta. 26590.
9	Capacitor bank 170-4 disconnected from circuit		West of Rd. 1350E on Rt. 164.
13	Two missing guy markers		River Cabin Rd. at the tap to Sta. 15189, north of Rd. 2350N.
13	Woodpecker hole in pole top		2nd pole south of Sta. 15216 on River Cabin Rd.
13	Woodpecker hole in pole top		At Sta. 15216 on River Cabin Rd.
21	Woodpecker hole in pole		2nd span south of Rd. 2200N in the tap to Sta. 13054.
21	Missing guy marker		3rd span south of Rd. 2200N in the tap to Sta. 13054.
21	Two broken neutral spools		2nd & 3rd poles west of Rd. 1400E along Rd. 2225N.
22	Missing guy marker		On Rd. 2250N at the taps to Stas. 25036 & 25886.
22	Missing guy marker		Corner of Rds. 2250N & 1400E.
22	Missing guy marker		At Sta. 14517 north of Rd. 2250N on Rd. 1400E.
23	Woodpecker hole in pole top		2nd pole south of Sta. 13037 on Rd. 1400E.
29	Badly shell rotted pole		3rd pole north of Rt. 164 on Little Brick Yard Rd.
31	Lightning damaged pole top		On Rd. 2300N where the circuit turns north to Sta. 13036.
36	Missing guy marker		On Little Brick Yard Rd. at the tap going east to Sta. 22221.
41	Missing guy marker		On Rd. 2100N at the west end of the circuit.

(continued)

Attachment "H" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/10 & 3/11/08
Circuit:	Q32170 (Oquawka & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Map No.	Item Description	Photo(s)	Location
43	Missing guy marker		At the guy stub pole at the corner of Rd. 2100N going west & Rd. 2100N going north.
43	Missing guy marker		At the corner of Rd. 2100N going south & Rd. 2100N going east.
46	Missing guy marker		2nd pole north of Sta. 13878.
50	Missing guy marker		At Sta. 13093 on Rd. 2200N.
50	Broken primary downguy	1856	1st pole east of Sta. 13093 on Rd. 2200N.
50	Lightning damaged pole top & blown lightning arrester		3rd pole east of Sta. 13093 on Rd. 2200N.
51	Missing guy marker		1 span west of Rd. 1650E in the line spur going west.
52	Lightning damaged pole top		On Rd. 1650E at the 1st pole south of the line spur going east.
52	Missing guy marker		On the 3-way corner pole 1 span north of Sta. 13090.
53	Missing guy marker		3rd pole north of Sta. 13878.
54	Missing guy marker		At Sta. 13240.
54	De-energized primary & neutral conductors down and trees very close.	1853, 1854	In the last 4 spans of primary going south along Rt. 94.
55	Trees close to primary		In the 6th span south of Rt 164 along Rt. 94.
55	Missing guy marker		2 spans south of Rt. 164 along Rt 94.
55	Missing guy marker		1 span south of Rt. 164 along Rt 94.
56	Missing guy marker		1st pole south of relouser Sta. 170-7 on Rd. 1700E.
57	Missing guy marker		At Sta. 14528 on Rd. 1700E (Rt. 94) south of Rd. 2120N.
57	Missing guy marker		At Sta. 13122 on the east side of Rd. 1700E (Rt. 94) at Rd. 2120 N.
59	Missing guy marker		On Rt. 94 at the tap to Sta. 13094.
59	Missing guy marker		1st pole west of Rt. 94 in the tap to Sta. 13094.
59	Badly lightning damaged pole		2nd pole south of Sta. 13086 on Rt. 94.
61	Missing guy marker		3rd pole south of Sta. 13880 on a road not labeled on the map.
62	Lightning damaged pole top		1st pole south of Rd. 1900N on a road not labeled on the map.
62	Badly split (lightning damaged) pole top with several large woodpecker holes.	1851, 1852	1 span west of Rd. 1775E on Rd. 1900N.
62	Missing guy marker		On the south side of Rd. 1900N at Rd. 1775E.
62	Missing guy marker		On the east side of Rd. 1775E at Rd. 1900N.
62	Missing guy marker		At Sta. 13241.
63	Missing guy marker		At Sta. 13239.
63	Missing guy marker		1st pole east of Sta. 13239.
63	Broken primary downguy		On the guy stub pole east of the 1st pole east of Sta. 13239.
63	Trees into primary		Just south of Rt. 164 in the tap to Sta. 24391.
65	Missing guy marker		At Sta. 27220 south of Rd. 2125N, at Rd. 1775E.
67	4 large woodpecker holes in pole top	1858	4th pole south of Rd. 2300N (not labeled on map) on Rd. 1775E.
70	Missing guy marker		Corner of Rds. 1930N & 1800E.
71	Missing guy marker		South end of circuit on Rd. 1800E.
71	Missing guy marker		On Rd. 1800E at the tap to Sta. 13136.
72	Missing guy marker		On Rd. 1800E at the tap to Sta. 13134.
72	Broken neutral spool		3 spans east of Rd. 1800E in the tap to Sta. 13134.
72	Missing guy marker		4 spans east of Rd. 1800E in the tap to Sta. 13134.
72	Missing guy marker		At Sta. 13134 east of Rd. 1800E.
74	Broken downguy & missing guy marker		At Sta. 23358 north of CH13 (Rd. 2250N),
74	Missing guy marker		At Sta. 13089 on Rd. 2300N.
74	Missing guy marker		Corner of Rds. 2300N & 1800E.
77	Split pole top		1st pole north of Sta. 24518 in the tap going south from Rt. 164.

(continued)

Attachment "H" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/10 & 3/11/08
Circuit:	Q32170 (Oquawka & rural)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren)
Map No.	Item Description	Photo(s)	Location
77	Missing guy marker		2nd pole north of Sta. 24518 in the tap going south from Rt. 164.
78	Missing guy marker		2nd pole north of Rd. 2125N on Rd. 1850E.
79	Missing guy marker		At Sta. 13104 east of Rd. 1850E.
79	Missing guy marker		Along Rd. 1850E at the 1st pole north of the tap to Sta. 13104.
80	Missing guy marker		Corner of Rds. 2250N & 1850E.
80	Missing guy marker		1st pole south of Rd. 2300N on Rd. 1850E.
83	Missing guy marker		2nd pole west of the tap to Sta. 24925 on Rt. 164.
83	Large woodpecker hole in pole (about 10 ft. high)		Corner of Rt. 264 & Rd. 1900E.
83	Broken neutral spool		1 span north of Rt. 164 on Rd. 1900E.
84	Evergreen tree close to primary		Just west of Sta. 23542 in the tap going east from Rd. 1900E.
85	Missing guy marker		On the east side of Rd. 1900E across from Sta. 13133.
85	Hanging steel brace (field side)		3rd pole east of Rd. 1900E on Rd. 2100N.
85	Hanging steel brace (road side)		4th pole east of Rd. 1900E on Rd. 2100N.
87	Neutral conductor off the spool	1849	2nd pole east of Sta. 25058 on CH 1 (Rd. 1800N).
88	Badly shell rotted pole	1847, 1848	At Sta. 13260.
88	Badly shell rotted pole		1st pole east of Sta. 13260.
88	Badly shell rotted pole		2nd pole east of Sta. 13260.
91	Hanging steel brace (field side)		2nd pole west of the tap to Sta. 19422 on Rd. 2100N.
91	2 lightning arresters disconnected from the circuit (hot taps removed)	1857	1st pole east of the tap to Sta. 19422 on Rd. 2100N.
93	Broken ground wire at top of pole		1st pole west of the tap to Sta. 23936 on Rd. 2250N.
93	Missing guy marker		At Sta. 23561 in the tap going south from Rd. 2250N.
93	Missing guy marker		At the 1st pole on the south side of Rd. 2250N in the tap to Sta. 23561.
93	Minor lightning damage to crossarm		2nd pole east of Sta. 13107 on Rd. 2250N.
94	Missing guy marker		1st pole on the south side of Rd. 1800N in the tap to Sta. 23790.
94	Badly shell rotted pole	1850	2nd pole east of Sta. 13262 on Rd. 1800N.
94	Badly shell rotted pole		2nd pole north of Sta. 13251 on Rd. 2000E.
95	Split pole top		1st pole west of Rd. 2000E in the tap to Sta. 13260.
95	Lightning damaged pole top		2nd pole north of Sta. 24884 on Rd. 2000E.
100	Missing guy marker		On the guy stub pole at the southwest corner of Rds. 2000E & 2250N.
100	Missing guy marker		On Rd. 2250N at the tap to Sta. 25100.
100	Shell rotted pole & broken ground wire		3rd pole east of the tap to Sta. 25100 on Rd. 2250N.
104	Missing guy marker		Southeast corner of Rds. 2100E & 2200N.
105	Missing guy marker		On Rd. 2200N at the tap to Sta. 13287.
105	Missing guy marker		1st pole east of the tap to Sta. 13287 on Rd. 2200N.
107	Broken primary downguy		3rd pole south of Sta. 20802 on Rd. 100E.

Attachment "I"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/25/08
Circuit:	K39153 (Clinton, Lane, & rural)	Inspector:	J. D. Spencer, w/ Ron Pate (Ameren--am) & w/ Bev Hall (Ameren--pm)
Gen. Notes: This was not an AmerenIP worst performing circuit in 2007, but was a worst performing CAIDI circuit in 2006. The 12 kV circuit serves an eastern part of Clinton and a rural area east of Clinton, including the community of Lane. There are several inaccessible and cross-country sections, representing a small portion of the circuit. Animal guarding was very well done, and Staff noted many "extra" lightning arresters in the rural areas. Staff also noted several new poles and crossarms throughout the circuit. Errors were noted on several of the maps provided, and neither Clinton nor Lane were labeled on the circuit maps. NESC guying violations were noted at seven locations, though Staff did not try to find others. NESC railroad crossing violations were noted at one crossing.			
Map No.	Item Description	Photo(s)	Location
3 of 55	No primary downguy		At Sta. 53046 west of Grant Ave. in the alley north of South St., Clinton.
3	Trees close to primary		Just east of Madison St. on White St., Clinton.
6	Code railroad crossing violations (NESC 261.D.4.c): Single wood crossarms supporting a 3-phase crossing of a railroad, on both sides of the railroad crossing. (Double crossarms required).	118-1866, 1867	CH 1 (Rd. 1050E) just south of Rt. 10, at & 1 span south of the tap to Sta. 53085, Clinton (railroad mapped incorrectly on circuit map).
6	Broken primary downguy		1st pole north of Sta. 50948 on Rt. 10, Clinton.
10	Deteriorated & lightning damaged pole top	1868, 1869	2 spans south of Sta. 52236 on CH1 (Rd. 1100E).
11	Blown lightning arrester (field side)		1st pole east of the tap to Sta. 52177 on Jemima St.
12	Trees into primary		4th & 5th spans northeast of E. North St. on Rt. 54.
12	Missing guy marker		Corner pole on Rt. 54 just south of the circuit railroad crossing.
15	Badly split pole top	1870, 1871	3rd pole south of Sta. 53280 on CH 18.
16	Shell rotted pole		3rd pole west of the tap to Sta. 52100 on CH 18.
29	Badly shell rotted pole & broken ground wire		Corner of Rt. 10 & Rd. 525N.
36	Missing guy marker		Guy stub pole on the west side of Rd. 1550E at Rd 425N.
36	Field side primary phase conductor very slack & sagging low		Along 1st St. between Walnut & Greenwood Sts., Lane (not labeled on circuit map).
36	Broken jumper to field-side primary phase conductor		Corner of 1st & Greenwood Sts., Lane (not labeled on circuit map).
41	Code guying violations (NESC 279.A.2): Four ungrounded 12 kV downguys without strain insulators.	1863	On the west side of Rd. 1600E at Rd. 400N, southeast of Lane.
41	Code guying violations (NESC 279.A.2): Two ungrounded 12 kV overhead guys and one downguy without strain insulators.		Corner of Rds. 1600E & 425N, southeast of Lane.
41	Many splices in primary and neutral conductors		Several spans along Rd. 1600E, north of Rd. 425N.
42	Code guying violation (NESC 279.A.2): Insulator in 12 kV overhead guy not far enough away from pole.		At Sta. 52287 on Rd. 1600E, east of Lane.
44	Missing guy marker		1 short span north of Rd. 750N at Rd. 1600E.
50	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		On Rd. 400N at the tap to Sta. 52315, east of Lane.
52	Split pole top		On Rd. 1800E at the line corner feeding east to Sta. 52222.
53	Broken neutral spool		2 spans south of Rd. 400N on Rd. 1800E.
53	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		Corner of Rds. 400N & 1800E, east of Lane.
53	Missing guy marker		On the guy stub pole on the north side of Rd. 400N, 1 span east of Rd. 1800E.
53	Lightning damaged wood brace (field side)		3rd pole east of Rd. 1800E on Rd. 400N.
54	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.	1862	1st pole west of the tap to Sta. 52120 on Rd. 400N, east of Lane.

(continued)

Attachment "I" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	3/25/08
Circuit:	K39153 (Clinton, Lane, & rural)	Inspector:	J. D. Spencer, w/ Ron Pate (Ameren--am) & w/ Bev Hall (Ameren--pm)
Map No.	Item Description	Photo(s)	Location
54	Code guying violations (NESC 279.A.2): Ungrounded 12 kV overhead guy & downguy without strain insulator.	1860, 1861	Across & on the north side of Rd. 400N in the tap to Sta. 52120, east of Lane.
55	Broken ground wire on pole above the neutral (not connected to neutral)		2nd pole west of the circuit tie at the east end of the circuit on Rd. 400N (west of CH 14, Rd. 1900E).

Attachment "J"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/1 & 4/2/08
Circuit:	K62102 (Concord, Chapin, Arenzville, & rural)	Inspector:	J. D. Spencer, w/ Harry Stoller (4/1) & w/ Gordon Tingley (Ameren--4/2)
Gen. Notes: This was an AmerenIP next-worst SAIFI 12 kV circuit in 2007, serving Concord, Chapin, Arenzville, and a large rural area around those communities and northwest of Jacksonville. There are several inaccessible and cross-country sections, representing a small portion of the circuit. Staff inspected roughly 75% of this circuit, noting several new poles and crossarms, many "extra" lightning arresters in the rural areas, and that animal guarding was very well done. Staff noted trees into or very close to the primary at 15 locations, 12 cases of split or deteriorated pole tops, and 18 missing guy markers. Errors were noted on several of the maps provided. Staff noted NESC ground clearance violations at seven locations. Staff also noted NESC guying violations at seven locations, though it did not try to find others.			
Map No.	Item Description	Photo(s)	Location
3 of 139	Missing guy marker		4 spans west of Schone Ln. on Schone Rd.
4	Missing guy marker		South end of circuit on Harts Gravel Rd. where the tap goes east to Sta. 10982.
7	Broken secondary downguy		At Sta. 10905 on Vangundy Rd.
8	Broken ground wire		On the west side of Vangundy Rd. where the road jogs to the east.
8	Missing guy marker		At Sta. 10901 on Williams Ln.
12	Large woodpecker hole in pole		1st pole east of Sta. 13363.
17	Tree very close to primary		Just east of Sta. 10908 on Cylinder Head Rd.
18	Broken neutral spool		2 spans northwest of St. Pauls Church Rd. on Rt. 104/67.
26	Slack primary downguy, with anchor rod pulled mostly out of the ground, & missing guy marker		North side of Kleinschmidt Ln. at Bethel Ln. (not labeled on map).
27	Missing guy marker		At Sta. 12203 east of Bethel Ln.
27	Missing guy marker		1st pole east of Bethel Ln. in the tap to Sta. 11975.
29	Broken ground wire on 69 kV structure		4th pole south of Base Line Rd. on Bethel Ln.
29	Code guying violations (NESC 279.A.2): Four ungrounded 69 kV & one 12 kV overhead guys with strain insulators not properly positioned.	118-1875, 1876	Corner of Bethel Ln. & Base Line Rd., northwest of Chapin.
29	Missing guy marker		On Base Line Rd. at the tap to Sta. 11081.
37	Broken primary downguy		1st pole north of Schumacher Rd. in the tap to Sta. 10112.
39	Missing guy marker		On the west side of Cooper St., 1 span north of the creek.
41	Sycamore tree very close to primary		Congress St. just south of the alley south of Everett St., Chapin.
41	Tree very close to primary		Just west of Cooper St. in the alley south of Everett St., Chapin.
41	Deteriorated pole top		Corner of Ash & Railroad Sts., Chapin.
41	Deteriorated pole top		1 span south of Superior St. on Ash St., Chapin.
41	Trees into primary		1st span east of Elm St. in the alley south of Morgan St., Chapin.
41	Trees into primary	1874	Just east of Sta. 13418 (west of Ash St.) in the alley south of Morgan St., Chapin.
41	Split pole top		1st pole west of Poplar St. in the alley south of Morgan St., Chapin.

(continued)

Attachment "J" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/1 & 4/2/08
Circuit:	K62102 (Concord, Chapin, Arenzville, & rural)	Inspector:	J. D. Spencer, w/ Harry Stoller (4/1) & w/ Gordon Tingley (Ameren--4/2)
Map No.	Item Description	Photo(s)	Location
41	No primary downguy		At Sta. 11957 on Congress St. at the alley north of French St., Chapin.
42	Badly split pole top	1873	Corner of North & Ash Sts., Chapin.
42	Broken primary downguy		Rt. 67/104 at the tap to the riser feeding south to Sta. 12501, Chapin.
46	Missing guy marker		1st pole south of the intersection of Brockhouse & Staakes Rds.
46	Missing guy marker		1st pole east of the intersection of Brockhouse & Staakes Rds.
63	White pine trees close to primary		Just west of Sta. 11953 on Brockhouse Rd.
63	Trees close to primary		In the two spans west of Sta. 10627 on Brockhouse Rd.
70	Trees close to primary		In the tap going east to Sta. 12564 from CH 7 (Concord-Arenzville Rd.)
71	Code guying violation (NESC 279.A.2): Insulator in 12 kV downguy too high (at pole).		At Sta. 10759 west of CH 7 (Concord-Arenzville Rd.), south of Concord Substation.
74	Tree very close to primary		Main St. just east of Elm St., Concord.
82	Badly split pole top	1872	4th pole east of the tap to Sta. 11035 on Sunnyside Rd.
90	Split (lightning damaged) wood brace (road side)		2nd pole west of Joy Ln. on Base Line Rd.
90	Broken ground wire		1st pole west of Joy Ln. on Base Line Rd.
91	Shell rotted pole		Middle pole (of three) in the E-W section of Joy Ln.
91	Deteriorated crossarms		1st pole south of Reservoir Rd. on Joy Ln.
91	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. <i>AmerenIP measured neutral clearance 4/16/08 to be 13' 8" (15.5 ft. required).</i>	1888, 1889	In the E-W section of the circuit south of Reservoir Rd., in the first span east of the tap to Sta. 10994, southeast of Concord.
92	Blown lightning arrester		2nd pole east of Sta. 12129 on Concord Rd.
92	Several woodpecker holes in pole		On Concord Rd. at the tap to Sta. 11717.
96	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		On the east side of Apples Rd. at Sunnyside Rd., east of Chapin.
97	Broken wood brace (field side)		2nd pole west of Sta. 10864 on Base Line Rd.
98	Trees into primary		In N-S de-energized line section south of Reservoir Rd.
102	Split pole top		At the east end of the circuit on Apples Rd. (1 pole east of Sta. 11018).
103	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy with strain insulator not low enough-- ON NEW POLE (2007 brand).	1887	At Sta. 11573 on Apples Rd., east of Chapin.
103	Broken ground wire		1st pole south of Sta. 11827 on Apples Rd.
103	Lightning damaged crossarm		1 span east of Apples Rd. on Base Line Rd.
104	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. <i>AmerenIP measured neutral clearance 4/16/08 to be 13' 2" (15.5 ft. required).</i>		1st span south of the tap to Sta. 10991 on Concord Rd., east of Concord.
104	Missing guy marker		1st pole south of the tap to Sta. 10991 on Concord Rd.
104	Badly damaged pole top		2nd pole south & east of the tap to Sta. 10991 on Concord Rd.
105	Trees into primary		1st span west of Sta. 12543 on the east side of Concord Rd.
105	Missing guy marker		At the tap to Sta. 13510 on Concord Rd.

(continued)

Attachment "J" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/1 & 4/2/08
Circuit:	K62102 (Concord, Chapin, Arenzville, & rural)	Inspector:	J. D. Spencer, w/ Harry Stoller (4/1) & w/ Gordon Tingley (Ameren--4/2)
Map No.	Item Description	Photo(s)	Location
105	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. <i>AmerenIP measured neutral clearance 4/16/08 to be 13' 5" (15.5 ft. required).</i>		1st span south of the tap to Sta. 13510 on Concord Rd., east of Concord.
105	Damaged pole top		1st pole south of the tap to Sta. 13510 on Concord Rd.
109	Missing guy marker		Corner pole on Concord Rd. where the road turns to the north.
109	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. <i>AmerenIP measured neutral clearance 4/4/08 to be 13' 6" (15.5 ft. required).</i>		On Concord Rd. in the 2nd span east of where the road turns to the north, southeast of Concord.
110	Split pole top & windshake pole		Corner pole on Concord Rd. where the road turns to the south.
113	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without properly placed strain insulator (top downguy to east).		Base Line Rd. on the south side of the railroad crossing, southeast of Concord.
113	Code guying violations (NESC 279.A.2): Ungrounded 12 kV overhead guys without properly placed strain insulators (top overhead guys to north & to west).	1885, 1886	Base Line Rd. on the north side of the railroad crossing, southeast of Concord.
113	Deteriorated wood pin crossarms (bottom squared arms)		Base Line Rd. at Standley Ln.
113	Missing guy marker		Standley Ln. at the tap to Sta. 10732.
113	Missing guy marker		1st pole west of Standley Ln. in the tap to Sta. 10732.
117	Vines up pole to transformer		Sta. 10977 on Concord Rd.
117	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. <i>AmerenIP measured neutral clearance 4/16/08 to be 12' 3" (15.5 ft. required).</i>		1st span west of Sta. 10978 on Sugar Hollow Rd., southeast of Concord.
120	Lightning damaged pole top		1st pole south of the tap to Sta. 10948 on Concord Rd.
120	Missing guy marker		At Sta. 10980 on Concord Rd.
120	Trees very close to primary		North of Concord Rd. in the 1st span of the tap to Sta. 10948.
120	Trees very close to primary		North of Sugar Hollow Rd. in the tap to Sta. 10738.
120	Code clearance violation (NESC 232.B.1): Inadequate neutral & primary clearance above ground. <i>AmerenIP measured neutral clearance 4/16/08 to be 12' 2" & primary @ 15' 8" (15.5 ft. neutral height required).</i>		North of Sugar Hollow Rd. in the tap to Sta. 10738, southeast of Concord.
125	Badly damaged pole top	1879, 1880	On Poor Farm Rd. at the tap to Sta. 12560.
South of 126	Code clearance violation (NESC 232.B.1): Inadequate primary clearance above ground. <i>AmerenIP measured neutral clearance 4/4/08 to be 11' 2" & primary @ 14' 10" (15.5 ft. neutral height required).</i>	1881	On Poor Farm Rd. in the 4th span south of the line corner going west to Sta. 10618, east of Concord.
128	Several lightning damaged poles		Along Sugar Hollow Rd. west of the tap to Sta. 12870.
129	Split pole top & Code guying violation (NESC 279.A.2)		On Poor Farm Rd. at the tap to Sta. 10989, east of Concord.
135	Vines up pole to primary		3rd pole south of Substation Rd. on Ebenezer Church Rd.
135	Vines up pole to primary		2nd pole south of Substation Rd. on Ebenezer Church Rd.

(continued)

Attachment "J" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/1 & 4/2/08
Circuit:	K62102 (Concord, Chapin, Arenzville, & rural)	Inspector:	J. D. Spencer, w/ Harry Stoller (4/1) & w/ Gordon Tingley (Ameren--4/2)
Map No.	Item Description	Photo(s)	Location
138	Missing guy marker		On guy stub pole at Sta. 12040 on Arcadia Rd.
138	Missing guy marker		2nd pole south of Sta. 11027, east & north off of Arcadia Rd.
138	Trees close to primary (several spans)		Several spans along Arcadia Rd. on both sides of the tap to Sta. 11028.
139	Trees into primary (three spans)		Along Arcadia Rd. in the last three spans at the north end of the circuit.

Attachment "K"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/2/08
Circuit:	R06212 (Jacksonville, S. Jacksonville, & rural)	Inspector:	J. D. Spencer, w/ Gordon Tingley (Ameren)
Gen. Notes: This was an AmerenIP next-worst SAIFI 12 kV circuit in 2007, serving a very small part of southeastern Jacksonville, part of South Jacksonville, and a rural area south of those cities. Staff inspected roughly 75% of this circuit, noting that animal guarding was very well done. There were few trees on the circuit. There were some mapping errors. Staff noted NESC ground clearance violations at two locations and a railroad crossing violation at one location. Staff also noted one NESC guying violation, though it did not try to find others.			
Map No.	Item Description	Photo(s)	Location
1 of 28	Missing guy marker		At Sta. 12972 at the west end of Fricke Ln.
4	Broken primary downguy & missing guy marker		Northwest corner of Massey Ln. & South Finch Rd.
4	Broken ground wire		On the east side of Massey Lane at South Finch Rd.
5	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/14/08 to be 14' 10" in north span & 11' 11" in south span (15.5 ft. required).		Along Massey Lane in the spans on both sides of Sta. 11156, south of Jacksonville.
14	Badly shell rotted pole (only neutral is attached)		2nd pole east of S. Clay on Lake St.
14	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		At Sta. 10012 at the east end of Southview Dr., South Jacksonville.
18	Broken spacer cable spacer		Just north of N. Laurel Dr. on Hardin Ave.
18	Missing guy marker		1st pole east of Hardin Ave. on Laurel Dr.
18	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance over a residential driveway. AmerenIP measured neutral clearance 4/14/08 to be 12' 0" (15.5 ft. required).	118-1891	On Lakelawn Dr. just north of Laurel Dr., South Jacksonville.
18	Deteriorated crossarms	1890	At Sta. 10520 on Laurel Dr. just west of the railroad.
18	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the east side of the railroad crossing. (Double crossarms required).	1892, 1893	On E. Vandalia St. east of Lakeview Terrace at the entrance to Kiwanis Grove Park (at recloser Sta. 212-5), South Jacksonville.
27	Deteriorated pole top		Northwest corner of Woods Ln. & Vandalia St.
28	Deteriorated pole top		5 spans south of the circuit tie to Circuit 50333 on Woods Ln.
28	Missing guy marker		1 span south of the circuit tie to Circuit 50333 on Woods Ln.

Attachment "L"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/14/08
Circuit:	M49410 (Glen Carbon)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: This was an AmerenIP worst performing SAIFI circuit in 2006 (not in 2007), serving a portion of the City of Glen Carbon. About half of this 12 kV circuit is underground and there are some inaccessible areas. Animal guarding was very well done, and Staff noted only a few circuit problems. Errors were noted on some of the maps provided. NESC guying violations were noted at two locations, though Staff noticed more and did not try to find others.			
Map No.	Item Description	Photo(s)	Location
2 of 11	Code guying violations (NESC 279.A.2): Two ungrounded 12 kV downguys without strain insulators.		On the west side of Rt. 157 across from the entrance to Glenwood Estates subdivision (at fuse station 410-37), Glen Carbon.
2	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		On the east side of Rt. 157 north of the entrance to Glenwood Estates subdivision (at Sta. 15526), Glen Carbon.
5	Vines around transformer on pole	118-1894	At Sta. 20663 in the easement south of Hampton Dr., east of Lake Hillcrest Dr., Glen Carbon.
5	Deteriorated pole top		At Sta. 20310 on Hampton Dr., Glen Carbon.
5	Deteriorated pole top		1st pole east of Sta. 20310 (at the primary riser) on Hampton Dr., Glen Carbon.

Attachment "M"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/14/08
Circuit:	R04413 (Edwardsville)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: This was an AmerenIP next-worst performing SAIFI circuit in 2007, with a SAIFI of 3.11, and was a worst performing SAIFI circuit in 2006. This 12 kV circuit, much of which is underground, serves a small southern part of Edwardsville. Staff inspected the overhead portions of the circuit, except for inaccessible portions along a bike trail. No problems were noted.			
Map No.	Item Description	Photo(s)	Location

Attachment "N"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15/08
Circuit:	M31203 (Galva, Bishop Hill, Nekoma, & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren)
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, with a SAIFI of 4.65, and was an AmerenIP next-worst SAIFI circuit in 2003. It serves a rural area from Galva westward past Nekoma, including the communities of Bishop Hill & Nekoma. Staff noted many "extra" lightning arresters in the rural areas and that animal guarding was at least "okay". Tree problems were noted at only two locations, though there are relatively few trees on the circuit. There are many deteriorated crossarms with saddle pin repairs. Staff noted seventy-seven (77) missing guy markers. Staff noted an NESC ground clearance violation at one location and a railroad crossing violation at one location. Staff also noted NESC guying violations at sixteen (16) locations, noticed others, but made no effort to find more.			
Map No.	Item Description	Photo(s)	Location
1 of 63	Missing guy marker		At the west end of the circuit on Rd. 2900N (at Sta. 33892).
1	Missing guy marker		At Sta. 34083 on Rd. 2900N.
1	Missing guy marker		At Sta. 33893 on Rd. 2900N.
3	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without properly placed strain insulator (insulator too far from pole).		Overhead guy crossing Rt. 17 at Rd. 970E, west of Nekoma.
5	Neutral spool bolt coming out of pole		2 spans east of the tap to Sta. 35123 on Rd. 2900N.
7	Missing guy marker		At Sta. 33882 on Rt. 17.
8	Missing guy marker		1st pole east of Sta. 34978 on Rd. 200N.
10	Neutral spool bolt out of pole		5th pole east of CH 3 (Rd. 1100E) on Rd. 2900N.
10	Neutral spool bolt out of pole	119-1904	6th pole east of CH 3 (Rd. 1100E) on Rd. 2900N.
10	Missing guy marker		Corner of CH 3 (Rd. 1100E) & Rd. 2900N.
10	Missing guy marker		At Sta. 35030 on CH 3 (Rd. 1100E).
11	Broken neutral spool		1st pole north of Sta. 33885 on CH 27 (Rd. 1080E).
12	Missing guy marker		1st pole south of Sta. 34158 on Rd. 1080E.
13	Missing guy marker		Corner of Rds. 1080E & 200N.
15	Missing guy marker		At Sta. 34931 south of Rd. 2900N.

(continued)

Attachment "N" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15/08
Circuit:	M31203 (Galva, Bishop Hill, Nekoma, & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren)
Map No.	Item Description	Photo(s)	Location
16	Two missing guy markers		On both sides of Rd. 2900N at the east end of the circuit.
17	Bottom bolt backed out of pole top pin & bottom arms rotated		11 spans east of voltage regulator station 203-1 on Rt. 17.
19	Badly lightning damaged crossarm		8 spans north of Rd. 3000N (Knox Co.) on Rd. 1200E.
20	Deteriorated pole top		2nd pole north of Sta. 33945 on Rd. 1200E.
20	Badly split (lightning damaged) crossarm		4th pole north of Sta. 34385 on Rd. 1200E.
21	Missing guy marker		On the west side of Rd. 1200E at Rd. 200N.
21	Lightning damaged & split pole top		2 spans east of Rd. 1200E on Rd. 200N.
21	Missing guy marker		At Sta. 33907 east of Rd. 1200E.
21	Missing guy marker		At Sta. 34570 east of Rd. 1200E.
22	Missing guy marker		At Sta. 33944 on Rd. 3000N (Knox Co.).
22	Missing guy marker		At the south end of the circuit on Rd. 1280E.
23	Split pole top		4 spans south of Rt. 17 on Rd. 1280E.
23	Broken primary downguy & missing guy marker		Corner of Rt. 17 & Rd. 1280E.
23	Missing guy marker		2 spans east of Rd. 1280 on Rt. 17 (mapping error).
24	Missing guy marker		1 span east of 9th St. on Elm St., Nekoma.
24	Missing guy marker		Corner of 9th & Elm Sts., Nekoma.
24	Missing guy marker		9th St. at the tap to Sta. 24006, Nekoma.
24	Missing guy marker		At Sta. 24006 west of 9th St., Nekoma.
25	Badly deteriorated "A" crossarm with saddle pin & primary falling off the end of the arm	1903	2nd pole north of Maple St. on 7th St., Nekoma.
25	Missing guy marker		Corner of Maple & 7th Sts., Nekoma.
26	Code guying violation (NESC 279.A.2): Ungrounded 69 kV downguy without strain insulator (downguy passes through 12 kV underbuild).		69 kV Str. 320 on 7th St. between Elm & Beech Sts., Nekoma.
26	Code guying violation (NESC 279.A.2): Ungrounded 69 kV downguy without strain insulator (downguy passes through 12 kV underbuild) and missing guy marker.	119-1901, 1902	69 kV Str. 319 just west of 6th St. between Elm & Beech Sts., Nekoma.
27	Missing guy marker		2 spans south of Elm St. on 6th St., Nekoma.
27	Missing guy marker		Guy stub pole at the southeast corner of Elm & 6th Sts., Nekoma.
27	Missing guy marker		Guy stub pole at the northwest corner of Elm & 6th Sts., Nekoma.
27	Missing guy marker		On Elm St. at the alley west of 6th St., Nekoma.
27	Missing guy marker		Corner of Rt 82 & Rd. 200N.
29	Missing guy marker		At Sta. 34569 on the south side of Rd. 200N.
33	Missing guy marker		6 spans south of Sta. 33917 on Rd. 1470E.
34	Missing guy marker		On the north side of Rd. 100N (not labeled on map) in the tap to Sta. 34651.
35	Missing guy marker		At Sta. 33924 south of Rts. 34 & 17.
35	Missing guy marker		At Sta. 33619 north of Rts. 34 & 17.
36	Split pole top		2nd pole west of Sta. 33943 on Rts. 34 & 27.
36	Blown lightning arrester		At Sta. 33943 on Rts. 34 & 17.
37	Split pole top		Corner of Main & Olson Sts., Bishop Hill.
37	Two missing guy markers		Corner of Front & Olson Sts., Bishop Hill.
37	Missing guy marker		Front St. at Kronberg St., Bishop Hill.
37	Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured the neutral height on 4/24/08 to be 12' 2" above ground (15.5' required).		1st span going west from Kronberg St. feeding Sta. 17030, at the northwest corner of Bishop Hill.
37	Missing guy marker		At Sta. 17030 at the northwest corner of Bishop Hill.
38	Missing guy marker		On Rd. 2900N on the east side of the railroad.

(continued)

Attachment "N" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15/08
Circuit:	M31203 (Galva, Bishop Hill, Nekoma, & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren)
Map No.	Item Description	Photo(s)	Location
41	Missing guy marker		At Sta. 33926 on the north side of Rts. 34 & 17.
42	Missing guy marker		On Rd. 1670E at the tap to Sta. 33675.
42	Nut coming off the back of neutral spool bolt		2 spans east of Rd. 1670E on Rd. 200N.
44	Code guying violations (NESC 279.A.2): Two ungrounded overhead guys without strain insulators.		Crossing Johnson St. at Knox St., Bishop Hill.
44	Missing guy marker		Corner of Bishop Hill Rd. & "B" St., Bishop Hill.
44	Trees close to primary		Along Knox St. on both sides of Erickson St., Bishop Hill.
44	Four missing guy markers		Corner of Bishop Hill Rd. & Main St., Bishop Hill.
44	Code guying violation (NESC 279.A.2): Ungrounded overhead guy without strain insulator.		Crossing Bishop Hill Rd. at Bergland St., Bishop Hill.
44	Trees close to primary		Along the north side of Main St. just west of Sta. 17039, Bishop Hill.
45	Lightning arrester jumper broken at hot tap (center phase)		7th pole west of the tap to Sta. 33015 on Rd. 3300N (Knox Co.)
48	Blown lightning arrester		At Sta. 33533 on Rd. 350N.
48	Missing guy marker		1st pole east of Sta. 33533 on Rd. 350N.
48	Two missing guy markers		Corner pole north of Sta. 33397 at the east end of Rd. 350N.
48	Missing guy marker		At Sta. 33397 at the east end of the circuit east of Bishop Hill.
49	Missing guy marker		1st pole west of Rd. 1800E in the tap to Sta. 34011.
49	Code guying violation (NESC 279.A.2): Ungrounded overhead guy without strain insulator (ground connection is disconnected).		At Sta. 34011 west of Rd. 1800E, southwest of Galva.
49	Missing guy marker		On the guy stub pole west of Sta. 34011, west of Rd. 1800E.
50	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & split pole top & missing guy marker.		3rd pole south of the tap to Sta. 34010 on Rd. 1800E, southwest of Galva.
50	Code guying violation (NESC 279.A.2): Ungrounded downguy with strain insulator too low in downguy & missing guy marker.		On Rd. 1800E at the tap to Sta. 34010, southwest of Galva.
50	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator		At Sta 34010 east of Rd. 1800E, southwest of Galva.
50	Code guying violation (NESC 279.A.2): Ungrounded downguy with strain insulator too low in downguy & missing guy marker.		On the south side of Rd. 2900N at Sta. 34009, southwest of Galva.
51	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing (Double crossarms required) & blown lightning arrester.	118-1900	At the Burlington Northern railroad crossing on Rd. 1800E at Sta. 34930, southwest of Galva.
51	Missing guy marker		On Rd. 1800E on the north side of the Burlington Northern railroad.
51	Missing guy marker		At Sta. 34013 west of Rd. 1800E.
52	Missing guy marker		Southeast corner of Rd. 1800E & Rd. 3000N (Knox Co.)
52	Hanging steel brace		3 spans north of Rd. 3000N (Knox Co.) on Rd. 1770E.
53	Badly split (lightning damaged) crossarm	1898, 1899	7 spans south of Rts. 34 & 17 on Rd. 1770E.

(continued)

Attachment "N" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15/08
Circuit:	M31203 (Galva, Bishop Hill, Nekoma, & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren)
Map No.	Item Description	Photo(s)	Location
53	Code guying violations (NESC 279.A.2): Two ungrounded overhead guys without strain insulators.		Crossing Rts. 34 & 17 at Rd. 1770E, west of Galva.
54	Two missing guy markers		Northeast corner of Rds. 200N & 1770E.
54	Badly shell rotted pole		2 spans north of Rd. 200N on Rd. 1770E.
54	Missing guy marker		At Sta. 33400 on Rd. 1770E north of Rd. 200N.
57	Bottom pole top pin bolt coming out of pole		3 spans west of Rd. 1850E on Rd. 300N.
57	Broken neutral spool		5 spans west of Rd. 1850E on Rd. 300N.
57	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator (top downguy) & two missing guy markers.		On Rd. 300N, just north of Sta. 33933, northwest of Galva.
57	Missing guy marker		At Sta. 33933 south of Rd. 300N.
58	Missing guy marker		Southwest corner of Rt. 34 & Rd. 1850E.
58	Shell rotted pole		5 spans north of Rt. 34 on Rd. 1850E.
59	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & missing guy marker.		On the last pole on the east side of Rd. 1850E south of Rd. 200N, west of Galva.
59	Broken guy strain insulator & two missing guy markers.		On the first pole on the west side of Rd. 1850E south of Rd. 200N.
59	Missing guy marker		On the next to last pole on the east side of Rd. 1850E south of Rd. 200N.
59	Badly split crossarm		1st pole north of Sta. 33941 on Rd. 1850E.
59	Hanging steel brace		3rd pole north of Sta. 33941 on Rd. 1850E.
59	Hanging steel brace		5th pole north of Sta. 33941 on Rd. 1850E.
59	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & missing guy marker.		On the first pole west of Rd. 1850E in the tap to Sta. 33936, west of Galva.
59	Field side wood pin through arm (neutral)		On Rd. 1850E at the 3rd pole north of the tap to Sta. 33936.
59	Deteriorated crossarm with the field side wood pin through arm (neutral)		On Rd. 1850E at the 4th pole north of the tap to Sta. 33936.
60	Missing guy marker		On the guy stub pole at the northwest corner of Rds. 1850E & 300N.
60	Code guying violations (NESC 279.A.2): Two ungrounded overhead guys, 1 to north with strain insulator too far from pole, and 1 to east without strain insulator.		Corner of Rds. 1850E & 300N, northwest of Galva.
60	Missing guy marker		On the guy stub pole at the southeast corner of Rds. 1850E & 300N.
60	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & deteriorated crossarm with neutral pin through arm.	1897	1 span south of Rd. 300N on Rd. 1850E, northwest of Galva.
60	Missing guy marker		On Rd. 1850E at the tap to Sta. 33934.
60	Missing guy marker		At Sta. 33934 east of Rd. 1850E.
60	Neutral pin through arm		1st pole south of the tap to Sta. 33934 on Rd. 1850E.
60	Missing guy marker		2nd pole south of the tap to Sta. 33934 on Rd. 1850E.
60	Missing guy marker		At Sta. 33935 on Rd. 1850E.
60	Lightning damaged crossarm (wired together)	1895, 1896	5th pole south of Sta. 33935 on Rd. 1850E.

Attachment "O"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15-16/08
Circuit:	N70332 (Kewanee & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren--4/15) & w/ Dan Runyon (Ameren--4/16)
Gen. Notes: This was an AmerenIP next-worst SAIFI 12 kV circuit in 2007, with a SAIFI of 3.44. It serves the south edge of Kewanee and a rural area south of Kewanee. Staff noted several new poles in the circuit, but also noted eighteen (18) shell rotted poles and another pole badly burned at the ground line. There are many "extra" lightning arresters in the rural areas, and animal guarding is well done. Fourteen missing guy markers were noted. Staff noted NESC guying violations at seven (7) locations, but did not try to find others.			
Map No.	Item Description	Photo(s)	Location
2 of 45	Six shell rotted poles		1st, 2nd, 3rd, 7th, 10th & 11th poles north of the tap to Sta. 34198 on Rd. 2450E.
2	Badly shell rotted & lightning damaged pole with bad top	119-1905	9th pole north of the tap to Sta. 34198 on Rd. 2450E.
3	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator (on NEW POLE).		Crossing Rd. 2450E at Rd. 200N, southwest of Kewanee.
4	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator.		Crossing Midland Rd. (Rd. 350N) at Rd. 2450E, southwest of Kewanee.
9	Badly shell rotted pole		3rd pole north of the tap to Sta. 34748 on Rd. 2550E.
10	Pole badly burned at ground line (marked for replacement)	1906, 1907	5th pole south of Rd. 200N on Rd. 2550E.
12	Code guying violations (NESC 279.A.2): Four ungrounded 12 kV overhead guys, two without strain insulators & two with strain insulators too far from pole..		Corner of Midland Rd. (Rd. 350N) & Rd. 2550E, south of Kewanee.
19	Coiled jumpers to lightning arresters		2 spans east of Beach St. on W. South St., Kewanee.
20	Missing guy marker		On Rd. 100N at the tap to Sta. 34123 (1 span west of Sta. 33756).
23	Spacer cable off the messenger		South of Rd. 300N on Rt. 34.
23	Missing guy marker		4th pole south of Sta. 34620 on Rt. 34.
24	Missing guy marker		1st pole south of Sta. 34963 on Rt. 34.
24	Missing guy marker		1st pole north of recloser Sta. 332-1 on Rt. 34.
25	Two primary spacer cable phase conductors out of spacer		Just west of Rt. 34 in the tap to Sta. 10900, Kewanee.
25	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator (on NEW POLE).		Overhead guy going east from Sta. 10600 on the east side of Rt. 34 (Tenney St.), north of W. South St., Kewanee.
28	Missing guy marker		1st pole on the north side of Rd. 300N, 6 spans west of Rd. 2700E.
29	Blown lightning arrester (road side)		5 spans west of Rd. 2700E on Rd. 300N.
29	Broken neutral spool		2 spans west of Rd. 2700E on Rd. 300N.
32	Split pole top		1 span west of Rd. 2750E on Rt. 91.
32	Missing guy marker		On Rd. 2750E at the tap to Sta. 34634.
32	Missing guy marker		At Sta. 34634 west of Rd. 2750E, on guy stub pole.
32	Badly split (lightning damaged) crossarm	1908, 1909	2nd pole north of Sta. 34221 on Rd. 2750E.
35	Shell rotted pole		4th pole west of Sta. 34130 on Rd. 100N.
39	Blown lightning arrester (road side)		4th pole west of the tap to Sta. 34138 on Rd. 400N.
39	Missing guy marker		At Sta. 34138 south of Rd. 400N.
39	Code guying violations (NESC 279.A.2): Three ungrounded 12 kV downguys without strain insulators.		Southwest corner of Rds. 400N & 2800E, southeast of Kewanee.
39	Lightning arrester with broken jumper to hot tap		4 spans south of Rd. 400N on Rd. 2800E.
40	Missing guy marker		On Rd. 2850E at the tap to Sta. 34602.
40	Missing guy marker		At Sta. 34602 east of Rd. 2850E.
40	Five shell rotted poles		2nd, 3rd, 4th, 5th, & 6th poles north of Rd. 150N on Rd. 2850E.
40	Shell rotted pole & missing guy marker		1st pole east of Rd. 2850E on Rd. 150N.
40	Shell rotted pole		2nd pole east of Rd. 2850E on Rd. 150N (at the tap to Sta. 34855).

(continued)

Attachment "O" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/15-16/08
Circuit:	N70332 (Kewanee & rural)	Inspector:	J. D. Spencer, w/ Jason Simac (Ameren--4/15) & w/ Dan Runyon (Ameren--4/16)
Map No.	Item Description	Photo(s)	Location
41	Missing guy marker		On the north side of Rt. 91 at Rd. 2850E.
42	Missing guy marker		On Rd. 2850E at the tap to Sta. 34142.
42	Missing guy marker		On Rd. 300N at Rd. 2850E.
42	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator.		Crossing Rd. 300N one span east of Rd. 2850E, southeast of Kewanee.
43	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator.		Crossing N. 300 Ave. 3 spans northwest of Sta. 33873, southeast of Kewanee.
43	Two shell rotted poles		1st & 2nd poles west of Sta. 34146 on Rd. 250N.

Attachment "P"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/23/08
Circuit:	P26284 (Marseilles & rural)	Inspector:	J. D. Spencer, w/ Tim McTaggart (Ameren)
Gen. Notes: This was an AmerenIP next-worst SAIFI 12 kV circuit in 2007, with a SAIFI of 3.35. It serves a small southern part of Marseilles and a rural area southwest, south, and southeast of Marseilles. There are several inaccessible areas. Staff noted several new poles in the circuit, but also noted twelve (12) shell rotted poles and several other poles and crossarms with structural deterioration or damage. Animal guarding is "hit and miss", and more animal guards are needed. More lightning arresters are needed in the rural areas. Tree trimming was generally very well done (and in progress during the inspection), but four close locations were noted. Eleven missing guy markers were noted. Staff noted NESC guying violations at nine (9) locations, but made no effort to find others.			
Map No.	Item Description	Photo(s)	1 of 54
1 of 54	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & split pole top & broken ground wire.		At the west end of the circuit on N. 25th Rd. (Illini Beach Rd., CH 66), southwest of Marseilles.
2	Missing guy marker		On N. 27th Rd. (Beach Rd., CH 55) at the tap to Sta. 75361.
4	Lightning damaged pole top		2 spans east of E. 20th Rd. on N. 25th Rd.
8	Missing guy marker		1st pole south of Sta. 75368 on 2079th Rd.
8	No primary downguy		At the north end of the circuit on N. 2079th Rd.
9	Code guying violation (NESC 279.A.2): Ungrounded 12 kV overhead guy without strain insulator.		Crossing E. 21st Rd. at the tap to Sta. 75239, southwest of Marseilles.
9	Shell rotted guy stub pole		On the west side of E. 21st Rd. at the tap to Sta. 75239.
9	Shell rotted pole		1 span north of N. 24th Rd. on E. 21st Rd.
9	Shell rotted pole with bad top		Northeast corner of E. 21st & N. 24th Rds.
9	Shell rotted guy stub pole		Northwest corner of E. 21st & N. 24th Rds.
9	Shell rotted pole		1 span east of E. 21st Rd. on N. 24th Rd.
9	Shell rotted pole & broken ground wire		2 spans east of E. 21st Rd. on N. 24th Rd.
9	Code guying violation (NESC 279.A.2): Ungrounded downguy with strain insulator too low in downguy & shell rotted pole.		3 spans east of E. 21st Rd. on N. 24th Rd., southwest of Marseilles.
9	Shell rotted pole		4 spans east of E. 21st Rd. on N. 24th Rd.
10	Shell rotted pole		8 spans south of N. 25th Rd. on E. 21st St.
10	Lightning damaged pole top		2 spans east of E. 21st St. on N. 24th Rd.
13	Badly shell rotted pole		1st pole west of where the circuit changes sides of N. 24th Rd.
13	Two missing guy markers		One on each side of N. 24th Rd. where the circuit changes sides of the road.
13	Code guying violation (NESC 279.A.2): Ungrounded downguy with strain insulator too low in downguy & shell rotted pole & missing guy marker.		1 span west of the tap to Sta. 75242 on N. 24th Rd., southwest of Marseilles.

(continued)

Attachment "P" (continued)

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	4/23/08
Circuit:	P26284 (Marseilles & rural)	Inspector:	J. D. Spencer, w/ Tim McTaggart (Ameren)
Map No.	Item Description	Photo(s)	1 of 54
13	No primary downguy		At the tap to Sta. 75242 on N. 24th Rd.
13	Missing guy marker		1 span west of Sta. 75682 on N. 24th Rd.
17	Split pole top		2nd pole north of N. 24th Rd. on CH 15.
18	Badly split crossarm		1st pole west of Sta. 28575 on CH 15 (N. 25th Rd.)
22	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		1st pole west of 2453rd Rd. on N. 25th Rd. (at OCR station), south of Marseilles.
22	Split pole top & woodpecker hole in pole	119-1912	On Troll Rd. (not shown or labeled on map) on 3-way corner pole at the tap to Sta. 75660.
22	Blown lightning arrester		At Sta. 76054 on 2453rd Rd. just west of E. 23rd Rd.
25	Lightning damaged crossarm		2nd pole east of Sta. 75891 on N. 24th Rd.
26	Missing guy marker		At Sta. 75669 east of E. 23rd Rd. (north of 2453rd Rd.)
26	Missing guy marker		1st pole east of Sta. 75247 on 2453rd Rd.
26	Trees into primary		2nd span east of 2350th Rd. on 2453rd Rd.
30	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		Northeast corner of E. 2360th Rd. (not shown or labeled on map) & N. 24th Rd. (1st pole south of Sta. 75787), south of Marseilles.
30	Trees close to primary		Between Stas. 75693 & 75753 on E. 2360th Rd. (not shown or labeled on map).
30	Code guying violations (NESC 279.A.2): Ungrounded 12 kV overhead guy & ungrounded 12 kV downguy without strain insulators.		At Sta. 75251 at the south end of the circuit on E. 24th Rd., south of Marseilles.
31	Badly deteriorated pole top	1910, 1911	3-way corner pole at the tap to Sta. 75695 east of 2350th Rd. (not labeled on map).
31	Code guying violation (NESC 279.A.2): Ungrounded downguy without strain insulator & missing guy marker.		On the pole (not shown on map) east of Sta. 75249 on 2453rd Rd., south of Marseilles.
33	Split (lightning damaged) wood brace		8 spans west of 2425th Rd. on Dupont Rd. (CH 30).
34	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		At Sta. 76109 (on primary riser pole) east of CH 15 (Main St.), Marseilles.
35	Missing guy marker		At Sta. 75250 on N. 2375th Rd.
35	Shell rotted pole		2 spans west of Sta. 75937 on N. 2375th Rd. (pole not shown on map).
35	Missing guy marker		3 spans west of CH 30 (Brookfield Church Rd.) in the tap to Sta. 75254.
36	Broken neutral spool		2 spans north of the tap to Sta. 75254 on CH 30.
36	Broken neutral spool		Approximately 5 or 6 spans north of the tap to Sta. 75254 on CH 30.
38	Trees close to primary		1st span east of Sta. 76332 on 2350th Rd.
38	Trees into primary		2nd & 3rd spans east of Sta. 76332 on 2350th Rd.
38	Badly lightning damaged pole		4 spans south of Sta. 75221 on 2425th Rd.

Attachment "Q"

Summary of Distribution Circuit Field Inspection by ICC Staff			
Utility:	AmerenIP	Date:	5/12/08
Circuit:	N50331 (Jacksonville, Arcadia, & rural)	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: This was an AmerenIP worst performing 12 kV circuit in 2007, repeating in that category from 2004 and 1999. It serves a northern and eastern part of Jacksonville and a rural area east of and north of Jacksonville, including the community of Arcadia. Staff inspected the portion of the circuit feeding east and northeast from Jacksonville. Tree trimming was well done on the approximate half of the circuit Staff inspected, with a few exceptions noted. Animal guarding was well done. Several "extra" lightning arresters were noted, but more may be needed. Staff noted several new crossarms and some new poles. Staff noted an NESC ground clearance violation at one location and a railroad crossing violation at one location. Staff also noted an NESC guying violation at one location, but made no effort to find others.			
Map No.	Item Description	Photo(s)	Location
35 of 97	Code guying violation (NESC 279.A.2): Insulator in 12 kV downguy too high (at pole).		At the east end of the circuit on Spates St., Jacksonville.
46	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the north side of the railroad crossing (Double crossarms required)	119-1927	Just south of the corner of Routt & Johnson Sts. (south of Mauvaisterre Creek), Jacksonville.
59	Trees close to primary		In the span just west of Sta. 11114 on CH 3.
70	Broken primary pole, broken primary downguy, & Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground.	1929, 1930, 1931	1st pole east of Earl Rd. on Old Rt. 36 East (in de-energized section of circuit), east of Jacksonville.
75	Guy stub pole with badly split pole top		Northeast corner of Old Rt. 36 & Fox Ln.
77	Vines up pole to single-phase primary conductor	1932	On the west side of Wohlers Rd. 1 span north of where the circuit changes from the east side to the west side of the road.
86	Woodpecker hole in pole		On the south side of Trafton Rd. 1 span east of where the circuit changes from the north side to the south side of the road.
87	Badly shell rotted pole		1st pole west of the tap to Sta. 10880 on York Rd.
87	Split pole top	1928	1st pole north of the tap to Sta. 10849 on York Rd.
89	Trees into primary		2nd span west of Sta. 13295, west of Matson Rd.
90	Tree into primary		Just east of Sta. 10885 on Twyford Rd. (east of Matson Rd.)
96	Shell rotted pole		1st pole west of Sta. 10892 on Harris Rd.

Attachment "R"

Summary of Distribution Circuit Spot Checks by ICC Staff			
Utility:	AmerenIP	Dates:	1/13, 2/20, 3/11, 4/14, 4/17, 4/23, 4/24, 5/29, 6/15, & 7/8/08
Circuits:	L12127 (Decatur); P54828 (Harvel); P98193 (Normal); J67132 (Bloomington); K36251 (Clinton); M26164 (W. of Warrensburg); M18131 (W. of Decatur); M05360 (Edwardsville); J12166 (SW of Argenta); Q34366 (Ottawa); Q34360 (Ottawa); K91115 (Decatur); 34 kV Line 3416 (Decatur); L24122 (Mt. Zion); K65221 (E. of Ellsworth); L70125 (Danville); L68115 (Danville); L68114 (Danville); L73155 (Danville); L74191 (Danville); & R06212 (South Jacksonville)	Inspector:	J. D. Spencer, w/ Bev Hall (Ameren--2/20, 3/11), w/ Mary Bilyeu (4/14), w/ Tim McTaggart (Ameren--4/23)
Gen. Notes: These are 2008 spot-checks of AmerenIP circuits, consisting of either follow-ups on prior year circuit problems or of new problems found that are not associated with other circuit inspections performed by ICC Staff. Staff's notes resulting from its 2008 inspections are shown in the item descriptions below in blue and red font. New NESC violations are noted at four locations.			
Circuit--Date	Item Description	Photo(s)	Location
L12127--1/13/08	Downguy broken & hanging on pole.		On the east side of N. MacArthur Rd. across from Arthur Ct., Decatur.
P54828--2/20/08	Attempted to verify correction of a clearance issue cited as an NESC violation in 2007-- 12 kV primary crossing over a skip-span pole with approximately 2 to 3 ft. vertical clearance. AmerenIP stated that it would de-energize or cover the primary wire when working above the lower supporting structure and it verified that the required minimum NESC clearance for those circumstances (2.5 ft.) was met. It also later installed a taller pole, contacting both the primary and secondary conductors.	117-1747, 1748 (2007)	On the north side of Township Rd. just east of Bennett St. (southwest of Sta. 10935), Harvel (map 30--Harvel, Raymond, & rural).
P98193--3/11/08	Verified correction of prior year NESC clearance violation-- 12 kV primary crossing over a street light on a skip-span pole with approximately 24 in. or less vertical clearance. OK 3/11/08.	116-1672, 1673, 1674 (2007)	Across from 1005 Gregory St., just west of Grove St. & the ISU golf course, Normal.
J67132--3/11/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required). OK 3/11/08	116-1679 (2007)	Gridley St. at Oakland Ave., Bloomington.
K36251--3/11/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required-- NEW POLE). OK 3/11/08.	116-1640 (2007)	Alexander Ave. north of Washington St., Clinton.
M26164--3/11/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a single phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required). OK 3/11/08.	112-1273, 1274 (2007)	Rt. 121 at Flanagan Rd. (7300 Rd.), west of Warrensburg.
M18131--3/11/08	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a three phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required).	118-1859	Along Wyckles Road north of Rt. 36, west of Decatur.
	Disconnected wood brace (hanging down--roadside).		6th pole north of the railroad, north of Rt. 36 on Wyckles Road, west of Decatur.
	Lightning damaged, splintered wood brace		14th pole north of I-72 on Wyckles Road, west of Decatur.

(continued)

Attachment "R" (continued)

Summary of Distribution Circuit Spot Checks by ICC Staff			
Circuit-- Date	Item Description	Photo(s)	Location
M05360-- 4/14/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a three phase crossing of a railroad, on the west side of the railroad crossing. (Double crossarms required). OK 4/14/08.	113-1357 (2007)	South of Old Alton-Edwardsville Rd. at the Wabash railroad crossing (at 34 kV Str. 70), Edwardsville (map 20-- Edwardsville & rural).
	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a three phase crossing of a railroad, on the west side of the railroad crossing. (Double crossarms required). OK 4/14/08.	113-1373 (2007)	Main St. (Rt. 143) at the Wabash railroad crossing, Edwardsville (map 20-- Edwardsville & rural).
J12166-- 4/17/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a single-phase (on arms) crossing of a railroad, on the east side of the railroad crossing. (Double crossarms required). OK 4/17/08.	117-1725, 1726 (2007)	Wise Rd. just west of Rt. 48, southwest of Argenta (map 24-- Argenta, Oreana, & rural).
Q34366-- 4/23/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required). OK 4/23/08.	116-1633, 1634 (2007)	LaSalle St. north of Marquette St., Ottawa.
	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required). OK 4/23/08.	116-1635, 1636 (2007)	LaSalle St. just north of Fremont St., Ottawa.
Q34360-- 4/23/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required). OK 4/23/08.	116-1638 (2007)	Columbus St. north of Marquette St., Ottawa.
K91115-- 4/24/08	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required).	119-1913, 1914	East side of Brush College Road south of Reas Bridge Road adjacent to the AmerenIP ADM substation, Decatur.
	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a single-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required).	119-1915	West side of Brush College Road south of Reas Bridge Road across from the AmerenIP ADM substation, Decatur.
34 kV Line 3416-- 4/24/08	Code railroad crossing violations (NESC 261.D.4.c): Single wood crossarms supporting a 3-phase crossing of a railroad, on both sides of the railroad crossing. (Double crossarms required).		West side of Brush College Road south of Reas Bridge Road just south of the AmerenIP ADM substation, Decatur.
L24122-- 4/24/08	Verified correction of prior year NESC ground clearance violation-- Secondary approximately 10 to 12 ft. high at mid-span (16 ft. required). OK 4/24/08.	117-1771 (2007)	CH 30 just west of the entrance to PPG, in the span going east from Sta. 26950, Mt. Zion.
K65221-- 5/29/08	Verified correction of prior year NESC ground clearance violation-- Neutral approximately 10 ft. to 11 ft. high at mid-span (15.5 ft. required). OK 5/29/08.	112-1263 (2007)	CH 28 (1200N), 2nd span east of tap to Sta. 17495, east of Ellsworth (map 47-- Colfax, Ellsworth, Cooksville, & rural).
L70125-- 5/29/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required). OK 5/29/08.	117-1705 (2007)	Oregon Ave. between Fairchild & Daniel Sts., Danville.

(continued)

Attachment "R" (continued)

Summary of Distribution Circuit Spot Checks by ICC Staff			
Circuit-- Date	Item Description	Photo(s)	Location
L68115-- 5/29/08	Verified correction of prior year NESC ground clearance violations-- 12 kV primary (3 spans of Circuit L68115--bottom circuit on poles) along a city street with vertical clearances ranging from 14'-9" to 18'-7". (At least 20 ft. vertical clearance is required). OK 5/29/08.	117-1708 (2007) (3rd span)	1st three spans east of Griffin St. on Williams St., Danville.
L68114-- 5/29/08	Verified correction of prior year NESC ground clearance violation-- 12 kV primary (1 span of Circuit L68114--top circuit on poles) along a city street with a vertical clearance of 19'-10". (At least 20 ft. vertical clearance is required). OK 5/29/08.	117-1708 (2007) (3rd span)	3rd span east of Griffin St. on Williams St., Danville.
L73155-- 5/29/08	Verified correction of prior year NESC railroad crossing violation-- Single wood crossarm supporting a 3-phase crossing of a railroad, on the west side of the railroad crossing. (Double crossarms required). OK 5/29/08.	117-1706 (2007)	Corner of Williams & Robinson Sts., Danville.
L74191-- 5/29/08	Verified correction of prior year NESC interstate highway crossing violation-- Single wood crossarm supporting a 3-phase crossing of an interstate highway, on the north side of the crossing. (Double crossarms required). OK 5/29/08.		North side of I-74 at Catlin Rd., Danville.
L12127-- 6/15/08	Broken plastic secondary pedestal, with top split open & accessible to public.		On the west side of the cul-de-sac at the north end of Wisteria Ct., Decatur.
R06212-- 7/8/08	Several broken spacer cable spacers.		Along E. Vandalia St. between S. Main St. & Nichols Park, South Jacksonville.

Attachment "S"

Summary of Tree Conditions Field Inspections by ICC Staff			
Utility:	AmerenIP	Date:	5/12/08
Circuits:	Random	Inspector:	J. D. Spencer, w/ Mary Bilyeu
Gen. Notes: Mixed results, depending on the location inspected. See the general notes, below, for each town inspected. Staff noted an NESC violation at one location and four other circuit problems during these tree trimming inspections.			
Town	Item Description	Photo(s)	Location
Jacksonville (5/12/08) -- <i>Trimming was inconsistent--okay in much of the city, but there were many tree conflicts in the west half of town (as has historically been the case). Three broken spacer cable spacers were also noted.</i>			
	Catalpa tree very close to primary		Finley St. north of Maple St.
	Sycamore tree into primary	119-1924	Webster Ave. north of Maple St.
	Oak tree very close to primary		Webster Ave. north of Maple St.
	Cedar tree very close to primary		N. Sandusky St. between Freedman & Maple Sts.
	Ash tree close to primary		N. Sandusky St. just south of Freedman St.
	Soft maple tree very close to primary		N. Sandusky St. just north of Dayton St.
	Soft maple tree very close to primary	1923	N. Sandusky St. just north of Lafayette Ave.
	Broken spacer cable spacer		Westgate Ave. north of Mound Rd.
	Ash trees close to primary		State St. between Grand Ave. & Chestnut St.
	Oak trees into primary	1920	State St. east of Finley St. (across from Illinois School for the Deaf).
	Ash tree close to primary	1921	State St. between Finley St. & Webster Ave. (across from Illinois School for the Deaf).
	Oak tree very close to primary		State St. just west of Webster Ave.
	Oak tree very close to primary		N. Sandusky St. just south of Lafayette Ave.
	Silver maple tree into primary	1922	N. Sandusky St. north of Duncan Park (between State St. & Lafayette Ave.)
	Broken spacer cable spacer		Mound Ave. just east of City Place.
	Sycamore tree into & overhanging 3-phase primary	1918, 1919	Mound Ave. west of Woodland Place.
	Silver maple tree into 3-phase spacer cable	1925, 1926	Diamond St. just south of Beecher Ave.
	Broken spacer cable spacer		Brooklyn Ave. south of Henry St. (at Mauvaisterre Creek).
South Jacksonville (5/12/08) -- <i>Trimming was very well done, with no problems noted. One broken spacer cable spacer was noted. One NESC clearance violation was also noted.</i>			
	Broken spacer cable spacer		Hardin Ave. just south of Michigan Ave.
	Code clearance violation (NESC 234.B.2): 12 kV spacer cable crossing over a street light bracket on a skip-span pole with approximately 24 in. vertical clearance. (At least 4.5 ft. vertical clearance is required unless the primary is de-energized anytime employees work above the lower supporting structure.)	119-1916, 1917	Vandalia St. in the first full span west of Clay Ave., South Jacksonville (Circuit R06212).

Attachment "T"

Summary of 2008 NESC Violations Noted by ICC Staff -- AmerenIP

Loc. No.	Circuit-- Date Inspected	Item Description	Photo(s)	Location	Date Utility Notified	Date Resolved	Date Verified
1	P47123-- 2/13-14/08	Code guying violation (NESC 279.A.2): Ungrounded 69 kV downguy without strain insulator properly placed below energized 12 kV conductors (existing wooden guy strain insulator is too high).	118-1819	1st pole east of Rd. 1200E (69 kV Str. 293) on Rd. 1400N (CH 6), southwest of Cameron (map 70--Monmouth, Cameron, Ormonde, Larchland, Berwick, & rural)..	5/7/08		
2	M18131-- 3/11/08	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a three phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required).	118-1859	Along Wyckles Road north of Rt. 36, west of Decatur.	3/11/08		
3 to 9	K39153-- 3/25/08	Numerous code guying violations (NESC 279.A.2)-- at 7 locations: Ungrounded downguys or overhead guys without strain insulators properly placed below energized conductors.	118-1860 to 1863	7 Locations-- Refer to "Summary of Distribution Circuit Field Inspection by ICC Staff" for Circuit K39153 (Clinton, Lane, & rural) and to circuit maps 41, 42, 50, 53, and 54.	3/25/08		
10		Code railroad crossing violations (NESC 261.D.4.c): Single wood crossarms supporting a 3-phase crossing of a railroad, on both sides of the railroad crossing. (Double crossarms required).	118-1866, 1867	CH 1 (Rd. 1050E) just south of Rt. 10, at & 1 span south of the tap to Sta. 53085, Clinton (map 6--Clinton, Lane, & rural).	3/25/08		
11 to 17	K62102-- 4/1-2/08	Numerous code guying violations (NESC 279.A.2)-- at 7 locations: Ungrounded downguys or overhead guys without strain insulators properly placed below energized conductors.	118-1875, 1876, 1885 to 1887	7 Locations-- Refer to "Summary of Distribution Circuit Field Inspection by ICC Staff" for Circuit K62102 (Concord, Chapin, Arenzville, & rural) and to circuit maps 29, 71, 96, 103, 113, and 129.	(4/2/08) 4/8/08		
18		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/16/08 to be 13' 8" (15.5 ft. required).	1888, 1889	In the E-W section of the circuit south of Reservoir Rd., in the first span east of the tap to Sta. 10994, southeast of Concord (map 91--Concord, Chapin, Arenzville, & rural).	(4/2/08) 4/8/08		
19		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/16/08 to be 13' 2" (15.5 ft. required).		1st span south of the tap to Sta. 10991 on Concord Rd., east of Concord (map 104).	(4/2/08) 4/8/08		
20		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/16/08 to be 13' 5" (15.5 ft. required).		1st span south of the tap to Sta. 13510 on Concord Rd., east of Concord (map 105).	(4/2/08) 4/8/08		
21		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/4/08 to be 13' 6" (15.5 ft. required).		On Concord Rd. in the 2nd span east of where the road turns to the north, southeast of Concord (map 109).	(4/2/08) 4/8/08		
22		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/16/08 to be 12' 3" (15.5 ft. required).		1st span west of Sta. 10978 on Sugar Hollow Rd., southeast of Concord (map 117).	(4/2/08) 4/8/08		
23		Code clearance violation (NESC 232.B.1): Inadequate neutral & primary clearance above ground. AmerenIP measured neutral clearance 4/16/08 to be 12' 2" & primary @ 15' 8" (15.5 ft. neutral height required).		North of Sugar Hollow Rd. in the tap to Sta. 10738, southeast of Concord (map 120).	(4/2/08) 4/8/08		
24		Code clearance violation (NESC 232.B.1): Inadequate primary clearance above ground. AmerenIP measured neutral clearance 4/4/08 to be 11' 2" & primary @ 14' 10" (15.5 ft. neutral height required).	1881	On Poor Farm Rd. in the 4th span south of the line corner going west to Sta. 10618, east of Concord (south of map 126).	(4/2/08) 4/8/08		

(continued)

Attachment "T" (continued)

Summary of 2008 NESC Violations Noted by ICC Staff -- AmerenIP							
Loc. No.	Circuit-- Date Inspected	Item Description	Photo(s)	Location	Date Utility Notified	Date Resolved	Date Verified
25	R06212-- 4/2/08	Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		At Sta. 10012 at the east end of Southview Dr., South Jacksonville (map 14--Jacksonville, South Jacksonville, & rural).	(4/2/08) 4/8/08		
26		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured neutral clearance 4/14/08 to be 14' 10" in north span & 11' 11" in south span (15.5 ft. required).		Along Massey Lane in the spans on both sides of Sta. 11156, south of Jacksonville (map 5).	(4/2/08) 4/8/08		
27		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance over a residential driveway. AmerenIP measured neutral clearance 4/14/08 to be 12' 0" (15.5 ft. required).	118-1891	On Lakelawn Dr. just north of Laurel Dr., South Jacksonville (map 18).	(4/2/08) 4/8/08		
28		Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the east side of the railroad crossing. (Double crossarms required).	1892, 1893	On E. Vandalia St. east of Lakeview Terrace at the entrance to Kiwanis Grove Park (at recloser Sta. 212-5), South Jacksonville (map 18).	(4/2/08) 4/8/08	4/4/08	5/12/08
29	M49410-- 4/14/08	Code guying violations (NESC 279.A.2): Two ungrounded 12 kV downguys without strain insulators.		On the west side of Rt. 157 across from the entrance to Glenwood Estates subdivision (at fuse station 410-37), Glen Carbon (map 2--Glen Carbon).	5/7/08		
30		Code guying violation (NESC 279.A.2): Ungrounded 12 kV downguy without strain insulator.		On the east side of Rt. 157 north of the entrance to Glenwood Estates subdivision (at Sta. 15526), Glen Carbon (map 2).	5/7/08		
31 to 46	M31203-- 4/15/08	Numerous code guying violations (NESC 279.A.2)-- at 16 locations: Ungrounded downguys or overhead guys without strain insulators properly placed below energized conductors.	118-1897, 119-1901, 1902	16 Locations-- Refer to "Summary of Distribution Circuit Field Inspection by ICC Staff" for Circuit M31203 (Galva, Bishop Hill, Nekoma, & rural) and to circuit maps 3, 26, 44, 49, 50, 53, 57, 59, and 60.	4/15/08 4/22/08		
47		Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground. AmerenIP measured the neutral height on 4/24/08 to be 12' 2" above ground (15.5' required).		1st span going west from Kronberg St. feeding Sta. 17030, at the northwest corner of Bishop Hill (map 37--Galva, Bishop Hill, Nekoma, & rural).	4/15/08 4/22/08		
48		Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the south side of the railroad crossing (Double crossarms required).	118-1900	At the Burlington Northern railroad crossing on Rd. 1800E at Sta. 34930, southwest of Galva (map 51).	4/15/08 4/22/08		
49 to 55	N70332-- 4/15-16/08	Numerous code guying violations (NESC 279.A.2)-- at 7 locations: Ungrounded downguys or overhead guys without strain insulators properly placed below energized conductors.		7 Locations-- Refer to "Summary of Distribution Circuit Field Inspection by ICC Staff" for Circuit N70332 (Kewanee & rural) and to circuit maps 3, 4, 12, 25, 39, 42, and 43.	4/16/08 4/22/08		
56 to 64	P26284-- 4/23/08	Numerous code guying violations (NESC 279.A.2)-- at 9 locations: Ungrounded downguys or overhead guys without strain insulators properly placed below energized conductors.		9 Locations-- Refer to "Summary of Distribution Circuit Field Inspection by ICC Staff" for Circuit P26284 (Marseilles & rural) and to circuit maps 1, 9, 13, 22, 30, 31, and 34.	4/23/08		
65	K91115-- 4/24/08	Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the north side of the railroad crossing. (Double crossarms required).	119-1913, 1914	East side of Brush College Road south of Reas Bridge Road adjacent to the AmerenIP ADM substation, Decatur.	4/24/08		
66		Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a single-phase crossing of a railroad, on the south side of the railroad crossing. (Double crossarms required).	1915	West side of Brush College Road south of Reas Bridge Road across from the AmerenIP ADM substation, Decatur.	4/24/08		
67	34 kV Line 3416-- 4/24/08	Code railroad crossing violations (NESC 261.D.4.c): Single wood crossarms supporting a 3-phase crossing of a railroad, on both sides of the railroad crossing. (Double crossarms required).		West side of Brush College Road south of Reas Bridge Road just south of the AmerenIP ADM substation, Decatur.	4/24/08		

(continued)

Attachment "T" (continued)

Summary of 2008 NESC Violations Noted by ICC Staff -- AmerenIP

Loc. No.	Circuit-- Date Inspected	Item Description	Photo(s)	Location	Date Utility Notified	Date Resolved	Date Verified
68	R06212-- 5/12/08	Code clearance violation (NESC 234.B.2): 12 kV spacer cable crossing over a street light bracket on a skip-span pole with approximately 24 in. vertical clearance. (At least 4.5 ft. vertical clearance is required unless the primary is de-energized anytime employees work above the lower supporting structure.)	119-1916, 1917	Vandalia St. in the first full span west of Clay Ave., South Jacksonville.	5/13/08	5/13/08	
69	N50331-- 5/12/08	Code guying violation (NESC 279.A.2): Insulator in 12 kV downguy too high (at pole).		At the east end of the circuit on Spates St., Jacksonville (map 35-- Jacksonville, Arcadia, & rural).	5/13/08		
70		Code railroad crossing violation (NESC 261.D.4.c): Single wood crossarm supporting a 3-phase crossing of a railroad, on the north side of the railroad crossing (Double crossarms required)	119-1927	Just south of the corner of Routt & Johnson Sts. (south of Mauvaisterre Creek), Jacksonville (map 46).	5/13/08		
71		Broken primary pole, broken primary downguy, & Code clearance violation (NESC 232.B.1): Inadequate neutral clearance above ground.	1929, 1930, 1931	1st pole east of Earl Rd. on Old Rt. 36 East (in de-energized section of circuit), east of Jacksonville (map 70).	5/13/08	5/14/08	