

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission :
On Its Own Motion :
: 20-NOI-02
Notice of Inquiry regarding :
Electric and Natural Gas Service :
Safety and Reliability :

**AMEREN ILLINOIS COMPANY’S INITIAL COMMENTS
IN RESPONSE TO NOTICE OF INQUIRY**

COMES NOW Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois, AIC or the Company) and respectfully submits the following Initial Comments in response to the Illinois Commerce Commission (ICC or Commission) Notice of Inquiry 20-NOI-02 (NOI) regarding electric and natural gas safety and reliability.

The NOI solicits comments on the following questions set forth in the Commission's August 12, 2020 order.

I. INTRODUCTION

Ameren Illinois appreciates the opportunity to submit these Initial Comments in response to the questions posed by the Commission in its Notice of Inquiry regarding electric and natural gas safety and reliability. The Public Utility Act (the Act) gives the Commission the power to address issues of safety concerning public utility maintenance and operation of plant, equipment or other property. And, thus seeks to gather information to enable it to evaluate what information is available regarding the safety and reliability of utility services.

Ameren Illinois provides the following comments in response to the Commission's NOI. The comments are organized into sections applicable to electric only and then gas only for Questions A-E. Questions F-G are answered one time and apply to both electric and gas.

II. NOI QUESTIONS AND ISSUES - ELECTRIC SERVICE

A. Please explain the processes you use to inspect your utility plant, equipment, and property in order to ensure that utility service is provided in a safe and/or reliable manner. Please include detail on the types and quantities of plant, equipment and property inspected, and how and how frequently such plant, equipment, and property is examined.

Ameren Illinois employs a Circuit and Pole Inspection Process to ensure compliance with the National Electric Safety Code (NESC). Various inspection techniques are staggered and designed to recognize and address deficiencies that can occur over time.

Visual inspections: In-house linemen complete Short Cycle emergent issues visual inspections on all poles supporting sub-transmission (inspected annually) and distribution voltage (inspected every two years). Third-party inspection contractors complete detailed visual inspections, including infrared (IR), every 6 years.

Groundline Inspections: third-party inspection contractors complete groundline inspections (which also include IR and visual inspection) on all sub-transmission and distribution poles, as well as the associated guy stub poles, every 12 years. Groundline inspection includes diffusible rod, internal treatment and groundline wrap treatment on all sub-transmission and distribution poles.

By employing these rotating techniques, distribution poles are inspected every two years and sub-transmission poles are inspected every year.

Electric in-house personnel go through an Ameren Illinois 3-year apprenticeship program, which also requires 6,000 actual working hours. Both requirements must be completed before becoming a Journeyman Lineman. The line apprentice program is divided into six, 6-month phases. The program is designed to give apprentices an understanding of Ameren Illinois' and the industry's procedures and materials including but not limited to the following: safe working distances; driving and operation of equipment; knowledge and utilization of tools, materials, and rope (rigging); Ameren Corporation construction standards, procedures, and reference materials; the fundamentals of electricity, corresponding test equipment and principles of trouble shooting procedures; climbing proficiency and working from a pole; and general knowledge on safety, awareness and understanding all aspects of work.

Electric metering personnel may also identify potential concerns. When in-house metering personnel are in the field performing their routine work, they also report any safety or reliability issues they identify. On average this field work includes annually approximately 8,000 electric periodic meter tests associated with Part 410.170 and approximately 2,000 electric meter sample tests associated with Part 410.180. Any reported safety or reliability concerns discovered during electric meter testing work are addressed accordingly by the properly skilled personnel.

Part 410.155 requires that within 90 days after installation or exchange of any meter with associated instrument transformers and/or phase-shifting transformers, a post-installation inspection shall be made (under load) to determine that the meter is operating accurately. At a new or re-wired metering location where the installation includes potential transformers (PTs),

the inspection is required to be performed by someone other than the original installation. This Part therefore puts additional in-house metering personnel in the field to help identify and report any safety or reliability issues during the normal course of their work.

Substations are also inspected by in-house resources on a regular basis. All distribution and transmission substations located in the Ameren Illinois service territory are inspected on a monthly basis. The Ameren Illinois technicians use an iPad loaded with the Substation Mobile Solution (SMS) application. A series of questions are asked on each individual piece of equipment during the substation inspection. All applicable data is recorded: operation counter, temperature, pressure gauges, and any additional diagnostic readings. This information is then submitted, reviewed, and archived in the Maximo database. These substation inspections cover approximately 170,000 components that are inspected monthly.

B. Please explain how many workers currently perform such inspections, the average time spent in the field by each worker examining equipment and facilities, an estimate of the amount of utility plant, equipment, and property inspected annually by each worker, the qualifications of the workers performing such inspections, how workers are trained, how workers training is update to include changes in requirements, and how the work performed by the workers is supervised.

Outside of the Short Cycle inspections performed by in-house linemen and during other in-house work as discussed in response to Question A, Ameren Illinois uses third-party inspection contractors to perform circuit inspections. In support of the visual, groundline, and IR inspection programs, Ameren Illinois employs, on average, 66 full-

time third-party inspection contractors. The number of inspectors varies annually based on the number and types of inspections scheduled for the year.

For example, a Groundline crew (which typically consist of 4-5 people) can inspect approximately 225 distribution poles per week or approximately 146 sub-transmission poles, which require more time to excavate around the larger pole butts. The Groundline Inspection process includes excavating the poles, sounding and drilling holes to check for internal decay, installing internal chemical treatment in the pole, using a computer program to input real-time pole conditions, wrapping the pole with a treatment wrap, filling dirt back around the base of the pole, and tagging the pole. Additionally, a color coded ribbon is installed on poles that don't pass the inspection and require replacement rather than the aforementioned treatment. Groundline Inspections also include a full Visual Inspection and an IR scan by other inspectors.

Visual Inspection crews are estimated to inspect between 250 and 600 poles per week. Visual inspections include a trip to the pole by an inspector with a computer. Any deficiency that can be seen by the inspector is input into the inspection software. All non-emergency deficiencies noted in this matter are rolled into a work package for the circuit. The pole is also tagged as part of the Visual Inspection. Visual Inspections also include an IR scan by other inspectors.

IR inspectors perform an infrared inspection on every Groundline and Visual Inspection circuit. IR inspectors inspect poles and conductors with an infrared camera, only stopping to document and take images (both visual light and infrared) when equipment is operating above temperature guidelines. IR inspectors are often able to drive from spot to spot

and scan several poles from each location. Therefore, the ability to drive the route decreases the amount of time to inspect lines compared to a walking inspection.

Ameren Illinois requires inspection companies to perform their own quality control (QC) in the field. Additional third-party inspection company management and IT employees are involved in supervising field workers and processing data.

Ameren Illinois does not have specific qualification requirements for employees of inspection contractors. The inspection contractors hire their employees based upon their internal policies.

Ameren Illinois, however, requires that third-party inspection companies train their circuit inspectors. Inspector contractors administer and perform the training, which includes various internal training procedures, as well as training while working with experienced inspectors for a specified period. Training requirements are different for different positions. For instance, an IR inspector or Visual Inspector who typically works alone or relatively independently with a small group of inspectors requires more training and experience than a member of a Groundline crew whose main role is excavation.

Ameren Illinois requires third-party circuit inspection contractors go through an annual training at one of AIC's training centers before inspections start in January (Visual Inspection) or March (Groundline). During Ameren Illinois led training, Ameren Illinois supervisors review the inspection guidelines with the third-party inspection contractors. Any changes for the coming year are emphasized.

In addition to the robust QC audit that Ameren Illinois requires from the third-party inspection contractors, Ameren Illinois supervisors also perform QC of inspection work. This

additional QC on inspection results, is documented and used to evaluate and improve when necessary the performance of third-party inspection companies.

For substation inspections, there are approximately 30 in-house field workers that perform monthly substation inspections across Ameren Illinois. There are approximately 1,500 substations scheduled and inspected on a monthly schedule.

Substation Journeyman complete a 3-year apprenticeship training program that is done at an Ameren training facility. The apprenticeship training is divided into four 9-month steps. Apprentices are trained on construction standards of substations, equipment testing practices, troubleshooting, and repair of substation equipment. The majority of monthly substation inspections are performed by Substation Journeyman; however, there are some areas in the Ameren Illinois service territory where in-house linemen complete the monthly substation inspections. Training for substation inspections is usually on the job (OJT) from one Journeyman to another. If a need for updated training is identified for the monthly inspection process, a training document is created and communicated to field workers by their supervisors.

C. Please explain whether your utility uses third parties to verify that inspections are performed timely and accurately and, if so, how such verifications are conducted.

Ameren Illinois does not use third parties to verify that electric circuit inspections or substation inspections are performed timely and accurately. This is accomplished through the in-house Ameren Illinois management team.

D. Please explain whether your utility uses third parties to perform inspections and, if so, how your utility ensures that inspections are performed timely and accurately.

Ameren Illinois uses third-party inspection contractors to perform inspections. The Company takes great effort to ensure the timeliness and accuracy of these inspections. In addition to QC audits discussed in response to Question B, there are several methods utilized to grade and hold accountable the third-party inspection contractors.

Weekly calls are conducted and include both third-party inspection company, as well as Ameren Illinois, supervisors and leaders charged with managing the inspection programs. These calls focus on safety, progress, and schedule adjustments if necessary. Continuous communication also occurs during the course of the week.

Inspection contractors are graded using a key performance indicators (KPIs) that focus on financial, employee (i.e. safety), process efficiency (i.e. scheduling), and customer satisfaction (i.e. quality).

Scheduling is a key part of a robust inspection program. Third-party inspection contractors are required to utilize an annual three-pass inspection schedule across Ameren Illinois service territory. Ameren Illinois works with the inspection contractors to formulate the inspection annual pass schedule for the following year. Inspection contractors are held to this pass schedule with a tolerance of +/- 1 week. Schedule adjustments may be required for conditions such as flooding, and effective communications is also key to the success of the three-pass schedule. This pass system has also been extremely successful in not "swamping" the service territory with all the annual inspection work coming due at about the same time, as it helps spread corrective work over the course of the year.

E. Please explain how issues identified through inspections are addressed including how issues are prioritized and how potentially systematic issues are addressed.

Poles are prioritized in accordance with NESC pole strength standards. For example, pole replacement work is set into five categories with associated timelines based on pole integrity.

Pole Description	Days to Address
Emergency	1
Priority Pole Reject - <50% original strength	180
Priority Reinforceable Pole	180
Pole Reject - <66% original strength	730
Reinforceable Pole	730

Poles can be reinforced, rather than replaced, when the above ground strength is strong enough to allow for a pole band to be installed. This band installation is part of the C-truss, which restores the pole to original strength.

Emergency issues are routinely discovered by third-party inspection contractors during inspections. These emergency issues generate an order, which initiates a same day response for evaluation by a trained lineman and/or qualified engineering personnel. When the issue is a hazard to the public, the area is made safe and guarded until the issue is corrected. One example of an emergency order identified during a third-party inspection is when an inspector finds a substation gate malfunction.

Routine pole or circuit hardware deficiencies are to be replaced or repaired within 1 year.

For substation inspections, most issues are repaired when they are discovered at the time of the monthly inspection. If the repair work requires ordering materials or an outage, the repair is scheduled appropriately to minimize disruption of service.

Potential systemic issues that are identified by the inspection processes are evaluated by engineers and our construction standards group to determine if a change is needed in material or work practices.

III. NOI QUESTIONS AND ISSUES - NATURAL GAS SERVICE

A. Please explain the processes you use to inspect your utility plant, equipment, and property in order to ensure that utility service is provided in a safe and/or reliable manner. Please include detail on the types and quantities of plant, equipment and property inspected, and how and how frequently such plant, equipment, and property is examined.

To ensure safe and reliable natural gas services, Ameren Illinois conducts periodic inspections of its gas infrastructure in accordance with the Pipeline Safety Regulations found in the Federal Code of Regulations found in 49 CFR Parts 191, 192, and 199 as adopted by the Illinois Administrative Code in Title 83 Subpart 590.10 which define the safety standards for gas pipeline facilities. These safety inspections include, but are not limited to, the following processes to ensure pipeline safety and reliability:

- §192.459 External corrosion control: Examination of buried pipeline when exposed –
Whenever any portion of a buried pipeline is knowingly exposed, Ameren Illinois examines the exposed portion for evidence of external corrosion to determine if the pipe is bare, or if the coating is deteriorated. If any external corrosion requiring remedial action is found, an extended investigation is conducted circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

- §192.465 External corrosion control: Monitoring – Ameren Illinois inspects each non-metallic pipeline that is under cathodic protection to ensure that it remains under adequate cathodic protection at least once each calendar year, but with intervals not exceeding 15 months. Where this testing is impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines are surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period. Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2½ months, to ensure that it is operating. Each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection must be electrically checked for proper performance six times each calendar year, but with intervals not exceeding 2½ months. Each other interference bond must be checked at least once each calendar year, but with intervals not exceeding 15 months. Cathodically unprotected pipelines must be reevaluated at intervals no less than every 3 years not exceeding 39 months, and brought under cathodic protection in areas in which active corrosion is found. Any areas of active corrosion are identified by electrical survey. However, on distribution lines and where an electrical survey is impractical on transmission lines, areas of active corrosion may be determined by other means that include review and analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipeline environment.

- §192.467 External corrosion control: Electrical isolation – Ameren Illinois inspects each pipeline to ensure they are electrically isolated from metallic casings that are a part of the underground system. If isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing. These inspections and electrical tests are conducted each calendar year not to exceed 15 months for each casing that is not filled, to assure that electrical isolation is adequate.
- §192.477 Internal corrosion control: Monitoring – Where potentially corrosive gas may be transported, coupons or other suitable means are used to determine the effectiveness of the steps taken to minimize internal corrosion. Ameren Illinois performs such monitoring for internal corrosion two times each calendar year, but with interval not exceeding 7½ months.
- §192.481 Atmospheric corrosion control: Monitoring – Ameren Illinois inspects each segment of the gas pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion according to the following monitoring schedule:

Natural Gas Facilities	Inspection Frequency
Above grade transmission facilities	At least once every calendar year, but with intervals not exceeding 15 months
Farm taps connected to transmission	
Odorizers	
Above grade emergency valves	
Exposed facilities of a critical area patrol	
Commercial/Industrial gas meter sets that require annual calibration of electronic pressure devices	
Above grade Gas Storage Facilities	
Above grade distribution and high pressure distribution facilities	At least once every four calendar year, but with intervals not exceeding 51 months
Farm taps connected to high pressure distribution facilities	
Residential gas meter sets	
Commercial or industrial gas meter sets operating at standard metering pressure (7 inches water column)	

- §192.625 Odorization of gas – Ameren Illinois conducts monthly inspections of Odorizers to ensure the equipment introduces the odorant in the gas system without wide

variations in the level of odorant. To assure the proper concentration of odorant in each gas system, monthly periodic natural gas sampling is conducted in the systems using an instrument capable of determining that an adequate percentage of gas in air at which the odor becomes readily detectable is maintained.

- §192.705 Transmission lines: Patrolling – Ameren Illinois conducts periodic patrols of Gas Transmission pipelines to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation. Methods of patrolling include walking, driving, flying or other appropriate means of traversing the right-of-way. The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, according to the following minimum frequency:

Class Location	At highway and railroad crossings	At all other places
1	7 1/2 months; but at least twice each calendar year	15 months; but at least once each calendar year
2		
3	4 1/2 months; but at least four times each calendar year	7 1/2 months; but at least twice each calendar year
4	4 1/2 months; but at least four times each calendar year	4 1/2 months; but at least four times each calendar year

- §192.706 Transmission systems: Leakage surveys – Ameren Illinois conducts periodic leakage surveys with leak detection equipment on Transmission Mains and associated services. These surveys are conducted once each calendar year, at intervals not to exceed 15 months. Where these transmission facilities are located in a Class 3 location, these leak surveys are conducted at least twice each calendar year, at intervals not to exceed 7.5

months. Ameren Illinois does not currently have any gas transmission facilities in a Class 4 location which would require leak survey on a four times per calendar year basis.

- §192.723 Distribution systems: Leakage surveys – Ameren Illinois conducts periodic leakage surveys with leak detection equipment, testing the atmosphere for potential leaks in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks. In business districts, leak surveys are conducted at intervals not exceeding 15 months, but at least once each calendar year. Outside of business districts, leak surveys are conducted at least once every 4 calendar years at intervals not exceeding 51 months. For distribution lines that are cathodically unprotected, a leak survey is conducted at least once every 3 calendar years at intervals not exceeding 39 months.
- §192.731 Compressor stations: Inspection and testing of relief devices – Ameren Illinois inspects and tests each pressure relieving device in a compressor station, operating these devices to determine that it opens at the correct set pressure. Additionally, each remote control shutdown device for the compressor station is inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.
- §192.736 Compressor stations: Gas detection – Ameren Illinois inspects each gas detection and alarm system at its compressor stations to ensure proper functionality. These inspections are conducted four times each calendar year, not to exceed each quarter by more than 45 days.
- §192.739 Pressure limiting and regulating stations: Inspection and testing – Ameren Illinois inspects each pressure regulating station at intervals not exceeding 15 months, but

at least once each calendar year, to ensure the equipment is in good mechanical condition, that the equipment is properly sized for capacity, and that the equipment will adequately control or relieve excessive pressure where required.

- §192.745 Valve maintenance: Transmission lines – Ameren Illinois inspects each gas transmission line valve at intervals not exceeding 15 months, but at least once each calendar year.
- §192.747 Valve maintenance: Distribution systems – Ameren Illinois checks each distribution emergency valve which may be necessary for the safe operation of a distribution system at intervals not exceeding 15 months, but at least once each calendar year.
- §192.901 - 192.951 - Transmission Integrity Management Program - The Ameren Illinois Transmission Integrity Management Program (TIMP) specifies safety requirements to identify, prioritize, assess, evaluate, repair and validate the integrity of gas transmission pipelines that could, in the event of a leak or failure, affect High Consequence Areas (HCAs) along gas transmission pipelines. Additional details of a TIMP program requirements are described in 49 CFR 192.911.
- §192.1001 – 1015 – Distribution Integrity Management Program – The Ameren Illinois Distribution Integrity Management Program (DIMP) specifies safety requirements to understand the unique design, material characteristics, operating conditions, and maintenance & operating history of gas distribution pipeline facilities. The DIMP Program identifies existing and potential threats, evaluates and ranks risk, identifies and implements measures to address risk, and measures the effectiveness of the Program by

monitoring safety performance. Additional details of a DIMP program are described in 49 CFR 192.1007.

When in-house metering personnel are in the field performing routine work, they will also report any safety or reliability issues they identify. On average this field work includes annually approximately 2,300 gas periodic meter tests associated in accordance with Part 501.190 and approximately 14,000 gas meter sample tests associated with Part 501.250. 83 Ill. Admin. Code Parts 501.190 and 501.250. Any reported safety or reliability concerns discovered during gas meter testing work are addressed accordingly by the properly skilled personnel.

Ameren Illinois also conducts numerous other inspections to ensure the safety of gas facilities in the course of daily operations. These checks include a visual inspection of gas meter header installations when onsite for various activities and orders, continuing surveillance checks to observe any unusual activities which could impact the gas system, as well as a watch and protect program to observe excavators who dig around high-profile gas facilities, to ensure that damage does not occur.

B. Please explain how many workers currently perform such inspections, the average time spent in the field by each worker examining equipment and facilities, an estimate of the amount of utility plant, equipment, and property inspected annually by each worker, the qualifications of the workers performing such inspections, how workers are trained, how workers training is update to include changes in requirements, and how the work performed by the workers is supervised.

Ameren Illinois Gas Journeymen and Gas Apprentices.

Qualified Ameren Illinois employees perform safety inspections on the gas system through training and evaluation. As of August 31, 2020, the approximate number of current internal employees who are qualified to perform safety inspections are as follows:

Titles	Inspection Work	Number of Employees
Gas Journeymen and Gas Apprentices	Perform a variety of safety compliance inspections, gas leak response activities, and system construction activities.	371
Gas Meter Specialists	Perform gas meter exchanges, performing meter header safety inspections.	16
Gas Storage	Maintain and operate AIC's Gas Storage facilities.	50
Gas Regulator Technicians	Maintain and operate gas pressure control stations, large commercial and industrial metering, Odorization of gas, and the SCADA communication network for natural gas facilities.	58
CP Technicians	Perform cathodic protection inspections of AIC's gas facilities, maintaining proper protection to mitigate the risk of corrosion to steel gas facilities.	12
Damage Prevention Specialists	Work with excavators throughout the AIC service territory to ensure excavators are following the JULIE requirements for safe excavation. In addition, these individuals manage the Watch and Protect process which requires monitoring of high profile gas facilities when an excavator has a JULIE dig ticket in the direct vicinity.	8

AIC has Management Field Supervisors for employees who have oversight responsibilities to ensure that work is completed on time and that it is done correctly. When Gas Field employees work together, Crew Leader is assigned overall responsibility for the quality and completion of work to be performed. AIC also has a Quality Assurance Program that is used

to observe the work performed across Gas Operations to ensure it is done according to the requirements of the AIC operating procedures.

Ameren Illinois has a Gas Apprentice training program for its Gas Journeymen. This is a 27 month minimum duration training program which provides a mixture of classroom training instruction, classroom hands on training, study of operating procedures, and on the job training hours with other qualified Journeymen. Upon successful completion of the training program, these employees are tested to ensure they have the knowledge, skills, and ability to perform covered task work on the gas system. This Operator Qualification testing consists of a combination of written evaluations and practical skills evaluations and requires requalification on a periodic basis throughout their career.

All individuals who perform covered task work on the AIC gas system are trained and qualified for the covered tasks they perform in the course of their assigned duties. AIC also provides ongoing refresher training for gas employees on topics related to gas covered task work, and on any changes to the operating procedures.

Ameren Illinois Gas Contractor Employees

Ameren Illinois also uses Contractors to perform certain safety inspection activities including the Gas Transmission and Distribution leak surveys and pipeline patrols.

AIC's Leak Survey Contractor currently employs approximately 23 Contractor personnel to perform this leak survey work annually.

The Leak Survey contractors are trained annually by AIC Gas Training staff, and also are required to maintain Operator Qualification to perform this work. There are 2 Field Supervisors from the Contractor overseeing these Leak Surveyors. Additionally, AIC

has internal Management Personnel who have oversight of this work in the field and who perform quality assessments of the work performed.

Volume of Inspections Performed on the Gas System

Ameren Illinois maintains a list of the required safety compliance inspections to be performed in Maximo, an electronic Gas Compliance Asset Management System.

The approximate volume of inspections completed on an annual basis are as follows:

Inspection Type	Approximate Annual Volume
Emergency Valves	9,000
Regulator Stations	2,500
Odorization Inspections	1,900
Odorization Intensity Tests	7,000
Leak Surveys	1,300
Atmospheric Corrosion (w/leak surveys)	1,300
Pipeline Patrols	1,500
Compressor Station Relief Valves	15
Compressor Station Gas Detection System	55
Corrosion Control Inspection	41,000
Pipe Examinations	14,000

In addition, AIC responds to approximately 32,000 gas leak calls from the public on an annual basis.

C. Please explain whether your utility uses third parties to verify that inspections are performed timely and accurately and, if so, how such verifications are conducted.

Ameren Illinois does not use third parties to verify that gas inspections are performed timely and accurately. This is accomplished though the in-house Ameren Illinois management team.

D. Please explain whether your utility uses third parties to perform inspections and, if so, how your utility ensures that inspections are performed timely and accurately.

Ameren Illinois has an internal Gas Quality Assurance Program (QA Program) which reports to the Director of Pipeline Safety Compliance and Quality Management, and independent of Gas Operations. The Ameren Illinois Gas QA Program is currently comprised of 9 Management employees who observe safety inspection work performed in the field, as well as construction activities to ensure the work is done according to procedures.

For construction work performed on the gas system by Gas Contractors, AIC assigns independent Inspectors as quality oversight for each project to ensure construction work is completed according to procedures. Construction Inspectors are on the jobsites each day work is being performed and complete documentation of quality assessments through a mobile quality assessment inspection app.

AIC also uses a Contractor to perform field locates of buried gas facilities for excavators who will be digging in the vicinity of these facilities. The Locating Contractor has management employees who do quality inspections on the accuracy of the field line locate markings for gas facilities. In addition, AIC uses a third-party contractor to independently evaluate the quality of these gas facility locates, for a portion of the total JULIE locate facilities.

E. Please explain how issues identified through inspections are addressed including how issues are prioritized and how potentially systematic issues are addressed.

The Ameren Illinois Gas Quality Assurance program performs independent assessments of inspections performed on the gas system. Upon completion of each QA Assessment, a written report is created to document what inspection tasks were observed as well as any issues

identified requiring follow up activities. These reports are distributed to all stakeholders in Gas Operations. Where issues identified are not remediated during the assessment, corrective action is tracked to ensure the issue is remediated.

Gas Field Supervisors who observe quality issues take immediate action to correct the performance in the field. This can include informing the AIC Operator Qualification Program that a field employee or contractor needs to be retrained and requalified prior to resuming covered task work on the gas system.

Any issues identified during quality Inspections performed by Gas Construction Inspectors are also reported to Stakeholders for remediation and discussed with Contractors during Contractor Oversight meetings for any needed corrective action or continuous improvement.

AIC's Integrity Management programs are tasked with assessing threats to the gas system and their corresponding risk to the transmission and distribution gas systems. Both the TIMP and the DIMP have mechanisms that allow for issues to be investigated, validated, assessed for risk, and for evaluation to see if there are potentially systematic issues. The results of these reviews can identify any accelerated actions needed to address these risks.

AIC evaluates its Gas Operations and Maintenance Plan (O&M Plan) on an annual basis. Feedback from Gas Operations, from AIC Quality Assurance, and from other stakeholders is considered to strengthen procedures contained in the O&M Plan based on systematic issues, clarifications needed, or changes to Pipeline Safety regulations.

AIC is also implementing a Pipeline Safety Management System in accordance with the American Petroleum Institute (API) recommended practice RP 1173 standard. This system of

risk management and continuous improvement works to minimize risk for pipeline safety incidents at AIC and to strengthen a culture that emphasizes the importance of pipeline safety.

During monthly reviews of performance metrics related to the gas system, AIC Management review the monthly and annual results of safety inspections in comparison to established metrics. These reviews evaluate any trends for pipeline safety related inspections and allow for any corrective action or continuous improvement activities to be implemented to improve overall pipeline safety.

IV. THE FOLLOWING RESPONSES REFLECT BOTH ELECTRIC AND GAS

F. Please explain whether your utility provides safety awareness training or education to contractors and/or the public and, if so, please explain how this training or education is conducted.

Ameren Illinois provides safety awareness training in a wide variety of manners including but not limited to the following:

Weekly Calls

Weekly safety calls were previously discussed in response to Question D in the electric response section. Safety statistics are shared during these calls. With constant safety communication, third-party inspection companies sometimes take suggestions for their weekly topics from Ameren Illinois, and sometimes Ameren Illinois asks for specific topics to be covered regarding a recent safety incident, change, program, etc.

The second important part of the safety segment is an open discussion part of these meetings which allows and encourages anyone to bring up any safety issue. Safety tips are often disseminated during this opportunity and are sometimes quite important. They cover a very wide

range of topics from very technical safety issues to general safety issues such as driving carefully around children and school busses.

Shotgun Deer Season

Ameren Illinois sends an annual message to third-party inspection companies regarding Illinois shotgun deer season. The message also include a link to the Illinois Department of Natural Resources (IDNR) website for specific dates and more information.

<https://www.dnr.illinois.gov/hunting/deer/Pages/DeerSeasonsDeadlinesAvailablePermits.aspx>

The message encourages circuit inspection work in urban areas, as compared to rural areas, during shotgun deer season.

Joint Safety Meetings

Inspection contractors are required to participate in 2-3 Joint Safety meetings with Ameren Illinois and Ameren Missouri inspection program managers and field leadership as well as leadership from the third-party inspection companies. These are formal meetings with speakers and topics that have traditionally been face to face; due to COVID-19 protocols, these meetings are being held virtually in 2020. These meetings serve an important role in setting out safety expectations for inspection contractors.

Substation Entry Training

A small subset of experienced third-party inspectors are allowed to go into some distribution substations to perform visual inspections of poles inside substation fences. These inspectors must complete a substation entry course at one of Ameren Corporation's training centers. They are also taken inside a substation for further safety guidance before they are actually allowed inside a distribution substation fence.

Messages to Inspection Contractors When the Emergency Operations Center (EOC) is Activated/Deactivated.

Whenever the Ameren Illinois EOC is activated, inspection contractors are notified, and possibly given instructions about suspending inspection work across the state or perhaps in certain parts of the service territory as appropriate. These notifications are in the form of an e-mail, and include a notification when the EOC is activated, daily (or more) updates while the EOC remains activated, and a message when the EOC is deactivated with specific safety instructions regarding returning to work.

Safety Audits

As previously discussed in response to Question D under the electric section, Ameren Illinois performs safety audits on inspection contractors, and tracks their results in formal KPI meetings.

Monthly Safety Information Sharing

Information on safety is shared through routine monthly meetings and phone or email communications. Meetings occur at various levels from one Ameren Illinois group (i.e. distribution or substation) with a specific third-party prime contractor to between Ameren Illinois and Ameren Missouri work groups. Shared information may include near-misses, good catches, root cause of incident, contributing factors, corrective actions, etc. Safety concerns may also be reported anonymously.

Quarterly Safety Information Sharing

All prime alliance contractor safety meetings provide a platform to review previous incidents and actions taken. Best practices among the group are shared and expectations from Ameren Illinois leaders is enforced.

Emails are also sent routinely encouraging safe work practices and peer-to-peer safety performance. Property damage information is also shared during these quarterly emails as a means to help prevent recurrence.

Job Briefing documentation

Ameren Illinois works with all third-party contractor to establish job briefings are documented in accordance with OSHA compliance. Additionally, in-house personnel conduct documented job briefings that also comply with OSHA Standards.

Annual Refresher training

The Electric Distribution group conducts an annual refresher training once a year. Attendees are generally contractor foremen, safety professionals, and other management personnel. The style is "Train the Trainer" and focuses on safety expectations, any new Ameren Corporation policies that impact contractors, the Worker's Protection Assurance program, and any pertinent operational issues.

Contractor Safety Steering Committee

The steering committee consists of both Ameren Illinois and Contractor personnel. The committee works together to identify best practices and share those with all contractors.

Contractor Front Line Safety Seminar (CFLSS)

The CFLSS is training that is identified and conducted by Corporate Safety and the Contractor Safety Steering Committee. This training is focused at the General Foreman and Crew foreman level.

Community and Public Relations

The Ameren Illinois Community and Public Relations Team educates members of the general public about safe practices around natural gas and electrical equipment through a variety of channels. Several examples are provided as an Addendum to this NOI Initial Comments.

Earned Media – Radio, Television, Print, Web

Ameren Illinois has pre-packaged content that media members utilize to deliver important safety information to their audiences. These packages are routinely updated and refreshed. Electric proactive Public Relations (PR) programs focus on wires down near home protocols, wire on vehicle safety, substation safety, generator safety, farm safety, inspections being conducted in your neighborhood, and mylar balloon safety.

Gas PR programs include information such as detection of natural gas odor, reporting gas leaks, safety digging (call 811).

Stakeholder Validators

Messages are amplified by providing pre-packaged safety materials to partners with reach and influence over certain customer groups such as Chambers of Commerce, Farm Bureau, Township officials, and Fire Department Associations.

Social Media

Safety education messages are delivered to the general public through Ameren Illinois' social channels on Facebook and Twitter.

Direct to Customer

Each year, Ameren Illinois delivers important safety information directly to our 1.2 million electric, and 800,000+ natural gas customers through company-owned communication vehicles such as the customer newsletter, energy statement inserts, and on-bill messaging. General electric safety topics may include: overhead and underground electric

lines, safe digging/locating, JULIE 811, pad mount transformer safety, keep kites away from electric lines, tree climbing near electric lines, wire down safety and reporting, electricity and water hazards, boat dock safety, ground fault interrupters (GFIs), don't post messages on utility poles, vehicle accidents involving downed lines, and weather-head protocols. General **gas safety topics may** include: smell gas – leave fast, excess flow valves, reporting leaks, customer owned pipelines, safe digging/locating, JULIE 811, Hot water scalding hazards, Carbon Monoxide detection, pilot light safety, plug open gas lines, check fittings, and lightning damage. Direct communications and safe excavation practices are communicated to excavators during the Ameren Illinois Watch & Protect process.

Community Education

Ameren Illinois' Community Relations and Public Awareness delivers electric and natural gas safety education, including live action demonstrations to various community audiences: Schools, First Responders, County-based Emergency Management offices. Ameren Illinois has placed 811 banners throughout Ameren Illinois territory to help promote 811 and Safe excavation.

Website

The safety section of Ameren Illinois.com is routinely updated with fresh content on steps customers should take to be safer around natural gas and electricity. The Ameren Illinois website is also mobile optimized.

Municipal Awareness

During even numbered years, Ameren Illinois and Gas Public Awareness execute direct mail to Public officials with information on the location of natural gas pipeline infrastructure.

Contractors and Excavators

Ameren Illinois Damage Prevention, Public Awareness and Communications executes education programs to alert construction excavation companies about the location of electric and natural gas pipelines and reinforces best practices for working around this infrastructure. Tactics include direct mail to at-risk contractors with Business Reply mechanism allowing them to request additional safety materials. Additionally, Ameren Illinois executes communication to plumbers, sewer companies, and drain cleaners to educate them on what to do I case of boring through gas pipelines. Tactics include direct mail.

Ameren Illinois' Damage Prevention and Public Awareness provide safety awareness training to the general public, excavators, contractors, plumber, sewer contractors, and field tilers on safe excavation around Ameren Illinois' Gas and Electric facilities and the Illinois J.U.L.I.E. One Call laws. The training is conducted at an annual Excavators Safety Breakfast, the annual excavators Safety meetings and at job sites visits along with mailings and emails.

G. Please explain what processes you have in place to permit the public to report utility plant, equipment, and property that may pose a safety risk to the public, what formats are uses (e.g., phone calls, text messages, e-mails, website reports, etc.) what information is accepted through these processes (e.g., written reports, verbal reports, photographs, etc.) and the processes and procedures you have in place to act upon such reports.

Customers can report safety risks through a variety of published communication channels: Phone, website, e-mail, and social media. Information on how to report a safety concern is shared through newsletters, bill inserts, website, and various social media.

All Interested Persons Public utilities, interested persons and entities are requested to respond to the following questions and issues:

A. *Please explain any changes that can be made to the Commission's rules and regulations to better ensure that electric utility service is provided in a safe and/or reliable manner.*

Ameren Illinois offers no additional information for this question.

B. *Please explain any changes the public utilities could make in their practices or procedures to better ensure that electric gas utility service is provided in a safe and/or reliable manner.*

Ameren Illinois offers no additional information for this question.

V. CONCLUSION

Ameren Illinois appreciates the opportunity to provide these comments in response to the Commission's Notice of Inquiry and looks forward to continued progress and discussion on important issues regarding the safety and reliability of utility services.

Dated: September 15, 2020

Respectfully submitted,
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d/b/a Ameren Illinois



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ADDENDUM

GET UPDATES ON OUTAGES YOU REPORT.

When you report an outage, you can get text alerts to indicate the status of when power will be restored.

And keep informed about planned outages by making sure we have your current phone number on your account.

CALL  CLICK  CONNECT 

DON'T FALL FOR SCAMMERS 

PRETENDING TO BE UTILITIES

Ameren Illinois customers should be aware of telephone, mail, email, door-to-door, and other in-person scams in which criminals pose as Ameren representatives and demand immediate bill payment or personal information.

If you think you have been contacted by someone impersonating Ameren:

- Hang up the phone, or close the door, and call Ameren Illinois at **1.800.755.5000**.
- Never call a scammer back at the phone number they give you or use redial on your phone.
- Do NOT purchase a prepaid card, such as a Green Dot card, or provide any other form of payment that the caller or visitor is demanding.
- Never give out personal information such as bank account numbers, user names and passwords, credit card numbers, or Social Security numbers.
- If someone comes to your door and claims to be a utility worker, ask to see their employee ID and call us if you want to confirm the purpose of the visit.
- Delete all suspicious emails that require immediate action to verify or demand personal information.

For more information, visit AmerenIllinois.com.



Ameren Illinois
23 hrs · 🌐

It's not winter yet but the chill is on. If using a space heater, always place on a level, hard, non-flammable floor surface.



AMEREN.COM [About this website](#)

Keep your home warm and safe
Home safety tips

👍❤️👎 418 8 Comments 59 Shares

👍 Like Comment Share

Ameren Illinois - Facebook
Feb 25, 2020 · 🌐

Natural gas is odorless but we add a smell to help detect it. If you smell rotten eggs, leave fast and call us at 800.755.5000. We'll respond 24/7 at no charge.



DOWNED POWER LINE & VEHICLE SAFETY

Knowing what to do can save your life.
In crashes involving power lines, the vehicle and surrounding area may become energized, creating a dangerous situation for the driver and passengers.



IF YOUR VEHICLE COMES IN CONTACT WITH POWER LINES:

- 1 Assume all downed lines are live,** even if they aren't sparking or smoking.
- 2 Do NOT leave the vehicle** and warn others to stay far away. 
- 3 Call 911** and wait for the power company to arrive and de-energize the lines. 

ONLY IF YOU NOTICE SMOKE OR FIRE:

- 4 Jump out with both feet together** and without touching the car and ground at the same time.
- 5 Shuffle or bunny hop as far away as you can - both feet MUST stay together.** 

You don't have to physically touch power lines to be electrocuted.



SUSPECT GAS? ACT FAST.

SEE:
If you see an unusual area of dead vegetation, blowing dirt or bubbling water, it could be a natural gas leak.

HEAR:
If you hear a hissing or a roar sound, it could be a natural gas leak.

SMELL:
If you smell a distinct rotten egg odor, it could be a natural gas leak. We add the odor to keep you safe.




Scratch the blue flame to help you recognize what natural gas smells like.

Ameren Illinois
1.800.755.5000
AmerenIllinois.com
TTY Illinois Relay
711
JULIE Underground Locating
811
Illinois1Call.com



Are you safe around NATURAL GAS?

It heats our homes, our water and our drivers, too. For many of us natural gas is an important part of daily life. When used properly, natural gas is a safe and efficient source of energy. However, natural gas can be hazardous, too — with risks ranging from carbon monoxide poisoning to fire and explosion. Your safety is important to us. Please read this gas safety information and share it with your family. To learn more about energy safety, go to Ameren.com/Safety.

CUSTOMER-OWNED GAS LINES Ameren Illinois owns and maintains the natural gas pipelines that run to your gas meter. However, some customers also have buried gas piping to outdoor gas-burning appliances, such as a heater for a pool or detached garage, a permanently installed gas grill, or a natural gas light. You may also have buried piping if the gas fuel line from your meter goes underground before entering a basement or crawl space. This piping belongs to the property owner. Ameren Illinois does not maintain it and JULIE does not locate it. If you have buried gas piping, have a qualified plumbing or heating professional inspect it periodically for leaks and make any necessary repairs.

EASEMENTS FOR UNDERGROUND LINES Easements provide your utility company the access it needs to repair and maintain natural gas pipelines and electric lines that may be buried on or near your property. Adding a permanent structure on your property has the potential to infringe on utility easement rights. Before construction begins, ask your contractor to check for any utility easements affecting your property.



DON'T WAIT OR IT MIGHT BE TOO LATE!
Anytime you suspect a gas leak, call 1.800.755.5000 immediately. Don't assume someone else has already made the call. We will respond to emergencies at no cost to ensure your safety.



SMELL GAS? ACT FAST!

LEAVE THE AREA IMMEDIATELY — THEN CALL US. WE RESPOND AT NO COST.

24/7

TO ENSURE EVERYONE'S SAFETY.



Are you safe around ELECTRICITY?

Make a Splash With Safety
When summer begins to sizzle, many of us head for the nearest lake or swimming pool. But before you take that plunge, be aware of electrical dangers that could be lurking in the water. Electric shock drowning can occur when electricity leaks into the water from poorly installed and maintained electrical wiring. To minimize the risk, do not swim around docks with electrical equipment or boats plugged into shore power. If you are swimming and feel a tingle, swim away from the area and don't use metal ladders or objects. Exit the water when you no longer feel a tingle. Frequent inspections and maintenance of electrical equipment by a professional, as well as GFCI protection, can help prevent shock and electrocution around swimming pools and boat docks.

Ameren Illinois
1.800.755.5000
AmerenIllinois.com
TTY Illinois Relay
711
JULIE Underground Locating
811
Illinois1Call.com



BUYING A PHONE CHARGER?
The next time you lose or misplace your phone charger, think twice before purchasing a low-cost, generic replacement. Along with a potential burn and fire hazard, cheaply made charging components and devices can cause shock and electrocution. Using an authentic replacement charger made by your mobile phone's manufacturer is always a better choice.

Safe Electricity



May is National Electrical Safety Month, but make safety a year-round practice. Learn more at SafeElectricity.org



Ameren Illinois - Facebook
May 06, 2020 · 🌐

Nothing like fresh air and climbing a tree to get kids a little time off electronics. Always keep it safe and make sure the tree is away from power lines.

