

February 13, 2019

RE: Street Tree Ordinance

Mr. Tim Teddy,

In regard to the revised ordinance change regarding subdivision and zoning codes, specifically tree plantings within street Right of Way, Ameren Missouri would offer the following comments for consideration.

Our understanding is that the ordinance requires tree plantings that would be placed within street Right of Way between the curb and sidewalk. Ameren's installation of natural gas mains has traditionally been in this location. Our standard installation depth is 30-in of cover over our facility. Being in the area between the curb and sidewalk has allowed Ameren to maintain, repair, cut off or install new service lines with little or no conflict with trees, landscaping etc... Ameren's gas mains typically operate at 55psig; therefore it is desirable our facilities are within easy access in cases of emergency and also as far away from structures as possible.

Assuming that the usual scenario would be that Ameren's gas main would be installed prior to the plantings, there is concern that during the plantings damage could result during the excavation. Service lines coming off the gas main would also be a concern.

Also of concern is that after the plantings are complete we may be asked to provide service to a customer. At that time the planting could possibly cause a conflict with the routing of the service line. Ameren makes every attempt to install service lines by the most direct route. Plantings could cause us to install a service line with multiple directional turns which can lead to future confusion and more exposure. Along with this, if Ameren is asked by the customer to disconnect gas service we are required to cap the service at the main. If planting are over the service tap, the tree could suffer damage or potentially have to be removed to accomplish the work. Along with this, during an emergency we often have to squeeze off our polyethylene mains. Tree plantings could lead to delays in shutting off the gas due to being in the area that needs to be excavated for the shut off.

Moving our normal location to beneath the sidewalk poses some of the same issue as well as the planting could still be an issue since they would be in close proximity to the gas main. Relocating in to the utility easement is also undesirable as then you have multiple utilities in close proximity. Obviously since gas is hazardous, we do not want it close to electric facilities or even phone or fiber lines. Excavating in the utility easement would become extremely difficult for all utilities. If this ordinance stands as written Ameren would suggest that we have "rights" to the very back edge of the R/W and the first few feet of the utility easement. This would require that all utilities be in agreement with this layout so that we can all fit our facilities in the proper location.

It would appear that with the proposed changes, there would be increased costs in not only maintaining Ameren's gas system but serving our customers which could affect natural gas rates. Along with this is the issue of cost related to potential damage to trees while making repairs etc.. Although these are concerns, our ultimate goal is to protect life and property of the public and Ameren personnel. Anything that could compromise that would be strongly opposed.