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STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held at its office in
Jefferson City on the 14th day of
May, 2025.

In the Matter of the Establishment of a)
Working Case for the Development of Best) File No. OW-2025-0314
Practices for Wildfire Mitigation in Missouri)
)

**ORDER OPENING A WORKING CASE TO ASSIST IN THE
DEVELOPMENT OF BEST PRACTICES FOR UTILITY WILDFIRE
MITIGATION IN MISSOURI AND ASSESSMENT OF RISK**

Issue Date: May 14, 2025

Effective Date: May 14, 2025

The Commission is opening a working case to examine the wildfire mitigation preparedness of Commission-regulated utilities in the state of Missouri. The Commission will gather information from utility stakeholders regarding current wildfire mitigation preparedness and will use this information to assist in developing best practices.

The Commission will direct electrical and gas corporations, as defined in Section 386.020, RSMo, to provide certain information regarding current practices aimed at hardening their systems; technology and communication strategies for predicting, monitoring, and responding to wildfire risks; and a review of current insurance coverage. Municipally owned electrical suppliers, rural electric cooperatives, operators of municipal natural gas systems, operators of renewable natural gas systems, and operators of gas transmission and gathering lines are also invited to provide information and comments.

This file will serve as a repository for documents and comments. Using this file, anyone with an interest in this matter may view documents and may submit any pertinent responsive comments or documents. As this is not a contested case, anyone may file a comment without counsel and without *ex parte* constraints (arising from this matter). Intervention requests are not necessary to submit comments or view documents.

The public is welcome to submit comments by forwarding electronic communications through the Commission's electronic filing and information system (EFIS) or by mailing written comments. You may submit electronic comments or filings at the Commission's website at <http://www.psc.mo.gov>. (Click on the Access EFIS link on the right side of the page. Scroll down and click on the public comment link for instructions on how to register and submit comments or file a document in the official file. Please refer to File No. OW-2025-0314). Written comments in hard copy should be addressed to the Commission at P.O. Box 360, Jefferson City, Missouri 65102 and should also reference File No. OW-2025-0314. The public can view the contents of the file by following the same link at <http://www.psc.mo.gov>.

THE COMMISSION ORDERS THAT:

1. This case is established as a repository for documents and comments regarding the development of best practices for wildfire mitigation in Missouri.
2. Electrical corporations shall respond to the questions in Attachment A no later than June 30, 2025.
3. Gas corporations shall respond to the questions in Attachment B no later than June 30, 2025.

4. Information in responses may be designated as confidential, consistent with Commission rule 20 CSR 4240-2.135.

5. The Commission's Data Center shall provide a copy of this order to all electrical and gas corporations.

6. This order shall be effective when issued.



BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

Hahn, Ch., Coleman, Kolkmeier,
and Mitchell CC., concur.

Dippell, Chief Regulatory Law Judge

QUESTIONS FOR ELECTRICAL CORPORATIONS**A. Foundational Questions**

1. Describe and document how current policies, procedures, and plans consider the risks of wildfires. In your response, specifically consider the current vegetation management plan, policies and procedures regarding infrastructure inspection standards, and other emergency or restoration plans.
2. Describe your experience communicating with state and local governments regarding wildfires and/or wildfire risk in your service territory. *None*
3. Do you have insurance coverage for wildfire damage? If yes, does your ~~insurance~~ insurance coverage require you to have a wildfire mitigation plan (WMP) or make any special preparations regarding wildfires? Please explain.
4. Have you developed a Public Safety Power Shutoff (PSPS) policy with respect to wildfires? If a PSPS policy exists, please describe: *None*
 - a.) How customers are notified.
 - b.) Whether medically vulnerable or critical infrastructure customers are prioritized for communication or assistance.
 - c.) How commercial and industrial or other customer types are notified.
5. If you do not currently have a wildfire-specific policy or WMP, do you plan to develop one? What is the anticipated timeline? *None*

B. Risk Assessment & Mapping *none*

1. Please explain, for planning purposes, your ability to reliably model various climate and weather scenarios. Specifically, discuss your ability to understand how changing weather patterns impact wildfire risk across your grid.
2. If you have implemented a WMP, what types of climate and weather scenarios have been modeled?
3. Have you included sources of ignition from external causes when developing the WMP?
4. Are there any utility-owned models or partnerships (e.g., with universities or NOAA) for fire spread or risk prediction?

C. Situational Awareness & Forecasting *none*

1. Describe the types of weather variables collected for your situational awareness during weather or other unforeseen events, including wildfires.
2. Describe the types of weather variables collected for forecasting purposes.
3. Do you use third-party weather services or modeling software (e.g., IBM's Weather Company, NCAR tools) for predictive analytics related to wildfire conditions?
4. How is situational data integrated into operational systems (e.g., SCADA, ADMS)?

D. Grid Design & System Hardening *none*

1. Please describe how you prioritize WMP initiatives across your service territory.
2. Have any overlap with components of your vegetation management or major asset maintenance plans been identified? If so, please explain.
3. Please describe if you have deployed or plan to deploy:
 - a.) Covered conductors
 - b.) Fire-resistant poles or hardware
 - c.) Remote fault indicators
 - d.) Undergrounding of lines in high-risk areas

E. Asset Management & Inspections *inventory of assets only.*

1. Has an inventory of assets and a condition rating of those assets been conducted?
2. Describe how your inspection practices, including, but not limited to, inspections conducted pursuant to 20 CSR 4240-23.020, may be leveraged for development of a WMP.

F. Vegetation Management & Inspections *none*

1. What level of vegetation inventory and condition assessments have been made within your service area?

2. Do you use remote sensing (LiDAR, satellite, or drone imagery) to support vegetation assessments?

G. Grid Operations & Protocols *none*

1. Has an analysis been made of the various protective equipment and device settings that would be needed or used to implement a WMP?

H. Data Governance *none*

1. Have you considered what types of data it would be necessary to utilize for the implementation of a WMP, and how and where that data would be stored? If so, please explain.
2. Have you analyzed existing data, or collected new data to be used in developing and implementing a WMP?
3. Have you evaluated data aggregation and identified any sources of data that are siloed which need to be incorporated?

I. Resource Allocation Methodology *none*

1. Has an analysis been conducted that would designate how existing resources could be utilized in the implementation of a WMP?
2. Has any analysis been done of utilization of the existing resource allotment based on varying risk scenarios?
3. Have any additional needed resources required to implement a WMP been identified?
4. Are there internal or external constraints limiting the ability to fully implement a WMP?

J. Emergency Planning & Preparedness

1. If a WMP has been created, please describe if or how it has been integrated with any other overall disaster or emergency plans (prepared by any State or local entity).
2. Do you participate in annual tabletop or full-scale wildfire response exercises with state or local agencies?
3. Have you collaborated with investor owned utilities, rural electric cooperatives and/or municipally owned electrical suppliers for communication and integrating emergency plans? *yes -*

K. Stakeholder Cooperation & Community Engagement

1. Has a procedure been developed to share information and support other utilities your utility coordinates with, including rural electric cooperatives and/or municipally owned electrical suppliers?
2. Please describe if there has there been any education or involvement of the public about the various components of an existing (or proposed) WMP.
3. Are you willing to share your GIS system maps with the Missouri Public Service Commission and/or State Emergency Management Agency during emergencies? If no, please explain why. If you would be willing but there are constraints, please specifically explain them with citations if necessary.

only with appropriate agreements in place.

QUESTIONS FOR GAS CORPORATIONS

A. General*not applicable*

1. Please explain how the threat of wildfires is addressed in Emergency Plans (see 20 CSR 4240-40.030(12)(J) for emergency plan requirements). Does your Emergency Plan include wildfire-specific triggers, response timelines, or communications protocols? If so, please describe.
2. Have you met with local emergency responders (e.g. fire, police) to discuss coordinated responses to wildfires (see 20 CSR 4240-40.030(12)(J)1.B.)? If "yes", please describe the outcome of these meetings.
3. Have you provided any information or instructions to your customers regarding actions that should be taken with respect to natural gas service in the event of wildfire evacuations (e.g. closing valve at service riser)? If "yes", please explain what actions you have recommended, and also please explain how this information is disseminated (e.g., door tags, emergency preparedness mailers, website alerts)?
4. Have you evaluated the temperature ratings of your above ground natural gas or renewable natural gas assets (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the following:
 - a.) Ability of above ground pressure reduction equipment (e.g. regulator stations and farm taps) to control downstream pressure if involved in a fire? If "yes", please describe the outcome of that evaluation.
 - b.) Ability of service regulators to control downstream pressure if involved in a fire? If "yes", please describe the outcome of that evaluation.
 - c.) Potential disruptions in SCADA (supervisory control and data acquisition) communications between monitored and controlled physical assets and control room.
5. Have you evaluated the temperature ratings and burial depths of your plastic piping systems with respect to the potential for heat damage if ground surface above is involved in a wildfire? If "yes", please describe the outcome of that evaluation.
6. Have you evaluated the temperature ratings of your natural gas or renewable natural gas assets in vaults (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the ability of pressure

n/a

reduction equipment to control downstream pressure in the event of a wildfire at ground surface? If "yes", please describe the outcome of that evaluation.

7. Do you partner with fire departments or other agencies to communicate and respond to fires and wildfires? If yes, please explain.
8. Do you have insurance coverage for wildfire damage? If "yes", does your insurance coverage require you to have a wildfire mitigation plan or make any special preparations regarding wildfires? If not currently insured against wildfire risk, please explain why and whether coverage has been denied or deemed unavailable or uneconomical.

B. Natural Gas and Renewable Natural Gas Distribution Systems

1. Does your current Distribution Integrity Management Plan (DIMP) address the threat of wildfires? Please explain.

C. Natural Gas and Renewable Natural Gas Transmission Systems

1. How is the threat of wildfires addressed in your transmission integrity management program?

D. Infrastructure Resilience & Risk Assessment

1. What steps have you taken to assess wildfire risks near pipelines and critical infrastructure?
2. How do you protect gas transmission and distribution systems from wildfire damage?
3. Are there plans to upgrade or harden gas infrastructure in wildfire-prone areas?
4. Have you identified high-risk zones where wildfire-related damage to gas pipelines is most likely?

E. Emergency Response & Safety Protocols

1. What protocols are in place for shutting down gas service in areas threatened by wildfires?
2. Do your emergency procedures address isolating gas to specific locations by use of below-ground inlet valves at district regulator stations? If "no", please explain what alternative measures you could use to isolate the flow of gas to specific locations during a wildfire event.



3. How do you coordinate emergency response efforts with fire departments and local agencies?
4. Have you coordinated with emergency management to ensure that critical infrastructure is continuously supplied in the case of damage to gas supply infrastructure or the need for shutoff?
5. How quickly can you restore gas service after wildfire-related disruptions?
6. What measures are taken to prevent underground pipelines from being compromised by extreme heat?

F. Pipeline Integrity & Post-Wildfire Damage Assessments

1. What inspections are conducted to ensure gas pipeline integrity after a wildfire?
2. How do you monitor and prevent leaks or explosions caused by wildfire-damaged infrastructure?
3. Are there contingency plans for replacing pipelines in fire-damaged areas?

G. Customer Communication & Public Safety

1. How do you notify customers of wildfire-related service disruptions or potential safety hazards?
2. What public education efforts are in place to inform customers about wildfire-related gas safety measures?
3. Are customers provided with clear guidance on when and how to shut off their gas supply during a wildfire?
4. Are emergency contact procedures clearly communicated to residents in wildfire-prone regions?
5. Do you have a policy with regards to medically vulnerable or critical infrastructure customers and are they prioritized for communication or assistance?
6. Do you provide specific guidance to businesses and industrial users on wildfire-related gas safety? Please share specifics.

H. Mutual Aid Agreements & Industry Cooperation

1. Do you participate in mutual aid agreements with other gas providers for emergency response? Please provide a copy of a current agreement.

2. How do you coordinate with electric utilities to prevent infrastructure conflicts during wildfire mitigation efforts?
3. Are there standardized protocols for sharing wildfire risk data with other utilities and emergency responders?

A handwritten signature in black ink, appearing to be 'M. W.' or similar, is written in the center of the page.

