BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

INITIAL RESPONSE TO COMMISSION ORDER REGARDING QUESTIONS FOR ELECTRICAL CORPORATIONS

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("Evergy Missouri West") (collectively, "Evergy" or the "Company"),[1] and, pursuant to the Missouri Public Service Commission's ("Commission") ("Order") issued in the above-captioned docket responds as follows:

1. On May 14, 2025, the Commission issued its *Establishment of a Working Case for the Development of Best Practices for Wildfire Mitigation in Missouri.* The Commission directed each Missouri electrical and gas corporation to respond with 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. Electrical corporations shall respond to the questions in Attachment A of the Order no later than June 30, 2025.

2. Evergy appreciates the opportunity and respectfully submits the following comments in response to the Order:

[1] Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company ("KCP&L") and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company ("GMO").

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.

RESPONSE: Evergy is currently building a wildfire mitigation program. Step one was to obtain a risk assessment, and it was completed in January 2025. The risk assessment quantified Evergy's risk as 0.36, compared to the national average of 1.0. This relatively low risk points to strategically enhancing existing reliability programs for joint benefit of reliability and wildfire mitigation, with moderate additions to layer fire mitigations. Evergy has developed the following chart to describe the fire sequence and relevant mitigations appropriate for Evergy's risk profile.

Fire Sequence

The fire sequence chart below maps fire growth from cause to catastrophic damage. Each bullet point is an industry recognized mitigation (or interruption) Evergy is considering for that stage of the fire sequence.

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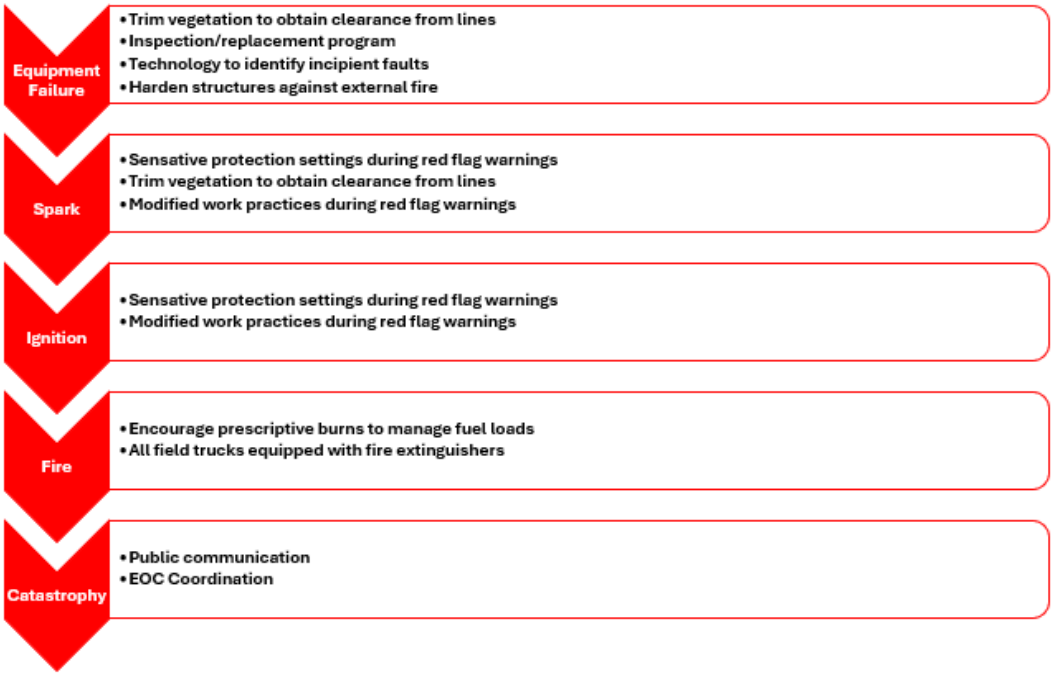
The fire sequence maps fire growth from cause to catastrophic damage. Each bullet point is an industry recognized mitigation (or interruption) for that stage of the fire sequence.



The fire sequence idea originated with Pacific Gas & Electric. This version is heavily modified to display Evergy's independent strategy.

Power Delivery Vegetation Management

A cornerstone of mitigation is vegetation management. Evergy also maintains its vegetation management program in accordance with relevant legal requirements applicable to the transmission and distribution systems. While Kansas does not mandate vegetation management like Missouri does, Evergy uses the same program in both states.

Evergy's vegetation management program is designed to achieve clearance, through trimming and/or elimination of woody vegetation, from energized facilities to reduce or eliminate vegetation/conductor contact until that circuit is to be worked again. It is also designed to provide clearance from energized facilities, through trimming and/or elimination of vegetation, on established transmission ROWs to improve access to facilities and prevent vegetation/conductor contact.

Another cornerstone of Evergy's mitigation strategy is inspections and replacements:

Distribution Inspections: Distribution performs cyclic pole inspections for structure integrity. Those inspections are accompanied by visual inspections of pole top equipment and hardware. Distribution also performs cyclic reliability inspections of both overhead and pad mounted equipment. More detail on these inspections can be found in section E below. Both inspection cycles are aimed at mitigating equipment failures in the name of reliability but also serve to mitigate fire risk by minimizing spark events.

Transmission Inspections: Transmission performs annual visual inspections to ensure facility integrity and vegetation clearance. Wood structures are on the same intrusive inspection cycle as distribution.

2. *Describe your experience communicating with state and local governments regarding wildfires and/or wildfire risk in your service territory.*

RESPONSE: Evergy has built strong working relationships with state and local government officials and emergency responders regarding emergency operations planning and communications including SEMA, local governments, public safety, fire districts, and fire departments. Although there has not been a specific focus regarding wildfires to date, Evergy regularly coordinates and communicates with these groups. Evergy will utilize these relationships in its upcoming wildfire mitigation plan and implementation program.

3. *Do you have insurance coverage for wildfire damage? If yes, does your insurance coverage require you to have a wildfire mitigation plan (WMP) or make any special preparations regarding wildfires? Please explain.*

RESPONSE: Evergy does have insurance coverage through an excess liability policy related to wildfires. Currently, our policies do not require a wildfire mitigation plan, but underwriters did ask if there is a plan in place and if so, what it entails. We anticipate the underwriting to continue to evolve.

4. *Have you developed a Public Safety Power Shutoff (PSPS) policy with respect to wildfires? If a PSPS policy exists, please describe:*

RESPONSE: The wildfire mitigation plan is a precursor to the necessary discussions around public safety power shutoff policies. Subsequent to Evergy completing its initial wildfire mitigation plan, the Company intends to engage with the Commission and stakeholders on a Public Safety Power Shutoff policy.

a. How customers are notified.

RESPONSE: We have not developed a PSPS policy to date.

b. Whether medically vulnerable or critical infrastructure customers are prioritized for communication or assistance.

RESPONSE: We have not developed a PSPS policy to date.

c. How commercial and industrial or other customer types are notified.

RESPONSE: We have not developed a PSPS policy to date.

5. *If you do not currently have a wildfire-specific policy or WMP, do you plan to develop one? What is the anticipated timeline?*

RESPONSE: Evergy is currently in the process of developing its WMP and plans to have an initial version drafted by December 31st, 2025. Evergy is working with the Kansas Commissioners on the same topic. Evergy is currently in the process of developing its wildfire mitigation plans and intends to present it to Kansas regulators contemporaneously with the Missouri Commission.

B. Risk Assessment & Mapping

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.*

RESPONSE: Evergy's ability to reliably model various climate and weather scenarios for wildfire risk is limited. Currently, Evergy accesses state resources for this type of work, and is therefore limited by available state resources. Evergy does review data from other sources and take

protective measures based upon that information. If there is a notification of an active fire burning, Evergy staff will use that information to follow up to protect system reliability. Our current practices will be integrated into the WMP. Evergy is also currently reviewing industry options to better assist us in evaluating the impact of changing weather patterns on wildfire risk.

2. *If you have implemented a WMP, what types of climate and weather scenarios have been modeled?*

RESPONSE: See response to question A.5. above.

3. *Have you included sources of ignition from external causes when developing the WMP?*

RESPONSE: Yes. Evergy is working toward installing steel poles or woods poles with fire retardant wraps in locations likely to experience prescriptive burns, to include those circuits identified as elevated risk by the static risk assessment. This work is being done as existing poles reach end-of-life.

4. *Are there any utility-owned models or partnerships (e.g., with universities or NOAA) for fire spread or risk prediction?*

RESPONSE: Evergy has been researching industry options and reviewing technological solutions with several companies and governmental entities.

C. Situational Awareness & Forecasting

1. *Describe the types of weather variables collected for your situational awareness during weather or other unforeseen events, including wildfires.*

RESPONSE: Evergy currently collects ambient temperature, relative humidity, sustained wind speed, dew point, growing season index, normalized difference vegetation index, energy release component, burn index, 1hr, 10hr, 100hr, 1000hr dead fuel moistures and the significant fire potential index from the Kansas Mesonet website. This data is currently not publicly available in Missouri. A meteorology vendor is researching their ability to provide similar information for Missouri.

2. *Describe the types of weather variables collected for forecasting purposes*.

RESPONSE: Evergy collects the following types of weather variables for forecasting purposes: weather forecast primarily revolving around wind and temperature.

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?

RESPONSE: Not at this time. Options are being researched

4. How is situational data integrated into operational systems (e.g., SCADA, ADMS)?

RESPONSE: Situational data is integrated into the following operational systems: supervisory control and data acquisition (SCADA), advanced distribution management system (ADMS), energy management system (EMS), and outage management system (OMS) at large scale, and is in the early stages of building a fault location, isolation, and service restoration (FLISR) system. The systems primarily monitor and report load, breaker position, and breaker operations.

D. Grid Design & System Hardening

1. Please describe how you prioritize WMP initiatives across your service territory.

RESPONSE: Evergy does vegetation and infrastructure inspections and analysis at the circuit level. The results of the analysis will shape how Evergy prioritizes mitigation strategies across the service territory. Evergy is also currently building a wildfire factor into existing distribution and transmission project prioritizing systems.

2. Have any overlap with components of your vegetation management or major asset maintenance plans been identified? If so, please explain.

RESPONSE: Vegetation planners make field visits to estimate labor for vegetation trimming. While on-site, they also perform basic facility inspections.

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.

RESPONSE:

a.) Covered conductors are not currently being considered due to high cost and significantly increased wind and ice loading on structures. As part of the WMP under development, Evergy intends to focus resources on replacing our oldest copper conductor with stronger aluminum conductor with steel reinforcement (ACSR).

b.) Transmission is leveraging steel poles and distribution may leverage flame retardant pole wraps where appropriate.

c.) Evergy is rolling out smart fault indicators, reclosers and breakers onto the distribution system.

d.) Undergrounding of lines has been cost prohibitive in most cases.

E. Asset Management & Inspections

1. Has an inventory of assets and a condition rating of those assets been conducted?

RESPONSE: Yes.

Transmission: An inventory of transmission assets (69kV and above) was conducted between 2021 and 2024 as part of a pilot program utilizing aerial imagery collected via Unmanned Aerial Systems (UAS) and helicopters. Each structure was captured and analyzed using a combination of inspector review and computer learning technology. A condition rating was applied selectively to structures exhibiting visible structural deficiencies, allowing us to prioritize maintenance and further inspection based on observed risk indicators.

Distribution: An inventory of distribution assets and the associated condition ratings have been completed over the initial detailed inspections started in 2008 and completed in 2020. Distribution equipment inventory records are stored and updated in Evergy's GIS software.

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.

RESPONSE: Our inspection practices, including those conducted pursuant to 20 CSR 4240-23.020, provide a foundation for the development of a WMP. We perform regular inspections of transmission infrastructure (69kV and above), including annual visual patrols and 12-year intrusive inspections of wood poles, in alignment with the requirements for inspection cycles. These inspections are documented and include condition ratings where structural deficiencies are observed. The data collected through these inspections—particularly in high-risk wildfire areas—can be leveraged to identify vulnerable assets, prioritize vegetation management, and schedule proactive maintenance or upgrades, such as structure replacements and grounding improvements, to reduce ignition risk. This systematic approach supports both compliance and wildfire risk mitigation.

F. Vegetation Management & Inspections

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

RESPONSE: Evergy complies with all the rules related to vegetation management inspections. For Transmission, Evergy manages and inspects vegetation pursuant to NERC requirements. For Distribution, Evergy manages and inspects vegetation as required in Missouri and those results are documented electronically at the time of inspection. Additionally, Evergy utilizes technology to identify and prioritize vegetation encroachment mitigation across our distribution network. While not mandated in Kansas, Evergy follows the same practices as in Missouri. Evergy reports to the Commission on the vegetation management annually.

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

RESPONSE: Evergy uses drone imagery and drone-based LiDAR on project specific requests. Evergy also has access to a software tool that includes tree canopy data.

G. Grid Operations & Protocols

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

RESPONSE: Although not specific to the implementation of a WMP, this analysis is ongoing. New *fast trip* technology was researched in-depth but determined to perform too inconsistently to justify the cost. Evergy engineers are now researching enhanced protection schemes implemented by other utilities.

H. Data Governance

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.*

RESPONSE: Yes, the data necessary for implementation of a WMP includes things such as:

- Meteorological data listed in the response to question C.1.
- Actual ignition events and the cause
- SAIDI/SAIFI consequences of enhanced powerline safety settings
- Asset location, type, and health
- Vegetation encroachment, species, and growth rates

Other data likely may be identified in the future. Depending upon the type of data, technology, and systems deployed, storage may be on either internal databases or hosted systems.

2. *Have you analyzed existing data, or collected new data to be used in developing and implementing a WMP?*

RESPONSE: Currently, Evergy collects and analyzes the following data that will be used in developing and implementing a WMP:

- Weather and fuel moisture data in locations where it is available.
- Failure cause data for outages
- Current wind speeds for every wind related outage.
- Asset location, type, and health
- Vegetation encroachment, species, and growth rates

3. *Have you evaluated data aggregation and identified any sources of data that are siloed which need to be incorporated?*

RESPONSE: Evergy has evaluated data aggregation and currently believes no data has been siloed. We will continue evaluating data aggregation as we develop and implement the WMP.

I. Resource Allocation Methodology

1. *Has an analysis been conducted that would designate how existing resources could be utilized in the implementation of a WMP?*

RESPONSE: Not at this time, but Evergy plans to leverage existing asset management and vegetation management programs as the cornerstone for building out our WMP. With enhancement, these existing programs will serve to further mitigate fire risk *and* customer outages.

2. *Has any analysis been done of utilization of the existing resource allotment based on varying risk scenarios?*

RESPONSE: We continually assess the utilization of existing resource allotments across the company.

3. *Have any additional needed resources required to implement a WMP been identified?*

RESPONSE: Yes. In order to implement a comprehensive wildfire mitigation program inclusive of industry common practices of forecasting and situational awareness, grid hardening,

and operations and emergency management, additional needed resources have been identified for the following areas:

- Meteorological data/information and expertise
- Fire spread, climate risk and wildfire modeling software
- A dedicated wildfire staff to assist with community engagement, fire department training, and documenting of data
- Other potential support staff for mitigation activities.
- Regulatory recovery that is tied to wildfire investments to enhance existing reliability and vegetation management programs, as well as additional grid hardening efforts like reconductoring and new sensor technologies.

4. Are there internal or external constraints limiting the ability to fully implement a WMP?

RESPONSE: As part of the WMP development, Evergy is considering additional financial and staffing needs. External constraints would include stakeholder recognition of this as a risk, customer cost sensitivities, time and technology limitations, general public sentiment, and legislative and statutory constraints. Additional constraints will continue to be evaluated as the plan develops.

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).

RESPONSE: A WMP is in process and will focus on mitigation strategy. Evergy will coordinate with state and local entities to help Evergy and the entities align their emergency operation and continuity of operations plans and emergency response.

2. *Do you participate in annual tabletop or full-scale wildfire response exercises with state or local agencies?*

RESPONSE: No, but we'd like to be involved. We encourage coordination between utilities and state and local agencies and have done tabletop exercises with these groups for other scenarios.

3. *Have you collaborated with investor-owned utilities, rural electric cooperatives and/or municipally owned electrical suppliers for communication and integrating emergency plans?*

RESPONSE: Evergy has engaged many other utilities to learn about their wildfire mitigation and response plans. Additionally, Evergy has joined working groups from Electric Power Research Institute (EPRI), and International Wildfire Risk Mitigation Consortium (IWRMC).

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?*

RESPONSE: While not specific to wildfires at this point, Evergy regularly communicates and coordinates with other utilities, including rural electric cooperatives and/or municipally owned electric suppliers regarding best practices, emergency response and mutual assistance plans. These relationships and existing mutual assistance plans provide an existing foundation for coordination of wildfire mitigation prevention and response.

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.*

RESPONSE: Not at this time; however, community education and involvement will be a component of the wildfire mitigation plan.

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.*

RESPONSE: During emergencies, Evergy will cooperate with the Commission, federal, state, and local emergency management, and response agencies, to the fullest extent possible. Currently, Evergy's GIS staff are activated during emergencies that may warrant the creation and sharing of GIS information with other emergency response agencies.

It is important to note that the GIS system maps may contain confidential or closed record information. *See for example,* Sections 589.663 RSMo and 610.021(14), (20) and (22) RSMo. Any confidential or closed record information contained within any such maps generated would be closed records. Agencies involved in emergency response would have access to the maps, including such closed records as are necessary for the purposes of emergency response. However, the agencies would need to keep the records confidential and protect the records as they would any closed records in their possession.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed, or mailed, postage prepaid, to the counsel for all parties this 30th day of June 2025.

/s/ Roger W. Steiner

Attorney for Evergy Missouri Metro and Evergy Missouri West