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	)))	Case No. OW-2025-0314

NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC'S
RESPONSES TO INFORMATION REQUESTS

Pursuant to the May 14, 2025 *Order Opening a Working Case to Assist in the Development of Best Practices for Utility Wildfire Mitigation in Missouri and Assessment of Risk*, NextEra Energy Transmission Southwest, LLC ("NEET Southwest") hereby submits its responses to the requests for information from the Missouri Public Service Commission ("Commission").

NEET Southwest looks forward to participating in any further activity ordered by the Commission in this proceeding and requests that the undersigned counsel be added to the service list in this proceeding.

Respectfully submitted,

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ATTORNEYS FOR NEXTERA ENERGY TRANSMISSION SOUTHWEST, LLC

NextEra Energy Transmission Southwest, LLC's
Responses to Requests for Information

Case No. OW-2025-0314

Question A.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

NextEra Energy Transmission Southwest, LLC ("NEETSW") is a transmission-only utility in Missouri that is currently in the process of constructing the Wolf Creek-Blackberry 345 kV Transmission Line ("WC-B"), which includes approximately 9 miles of 345 kV transmission line in Barton and Jasper counties, Missouri. The WC-B Line is scheduled to be completed by July 15, 2025. NEETSW is a wholly owned subsidiary of NextEra Energy Transmission, LLC ("NEET"), which is in turn, an indirect wholly owned subsidiary of NextEra Energy, Inc. ("NextEra"). When the WC-B line enters service, NEETSW will rely on certain of its affiliates throughout the NextEra organization for operations and maintenance support of its WC-B Line.

NEETSW takes wildfire risk mitigation seriously and has been proactively implementing wildfire mitigation processes, new technologies, and situational awareness modeling software to ensure public and employee safety as well as reliable operation of the bulk electric system and its assets. NEETSW currently is developing an Emergency Response Plan that will be in place upon the in-service date of its facilities, and NEETSW will utilize the Wildfire Response Plan of its affiliate Lone Star Transmission, LLC ("Lone Star"), which provides operations and monitoring support for the WC-B Line. These plans summarize the policies and procedures that the NEETSW system operators and employees who operate the Missouri assets will follow in the event of system and situational emergencies.

NEETSW currently monitors its transmission assets via an internal Firecaster Program, an automated wildfire forecasting and alerting product that incorporates real-time, short-term, and long-term wildfire risk displayed as a categorical index that describes relative wildfire risk on a daily basis. This index considers weather data, vegetation greenness and dryness, soil moisture, satellite imagery, wildfire modeling, and wildfire spread simulation, as well as provides active alerting should a fire come within 15 miles of NEETSW's assets.

NEETSW's Wildfire Response Plan determines how NEETSW will respond to a wildfire depending on the conditions presented. In addition, NEETSW's Firecaster model looks out seven days in advance to provide situational awareness to the system operator and NEETSW crews to ensure safe work practices are employed. During high fire threat days or red flag warnings, NEETSW may reschedule construction or maintenance activities to reduce the risk of an ignition.

NEETSW plans to implement the Technosylva wildfire risk modeling software platform in the fourth quarter of 2025 to further enhance situational awareness and oversight of the WC-B Line. Technosylva is the leader in wildfire science and technology, offering electric utilities state-of-the-art solutions in wildfire risk mitigation and wildfire risk planning and is employed by many of the major electric utilities in the country where wildfire risk is high. The Technosylva software platform provides predictive analytics, risk mapping, risk assessment, wildfire simulation, wildfire spread modeling and ignition notification if fires fall within 15 miles of the assigned NEETSW assets

NEETSW is actively engaged in benchmarking other utilities focusing on wildfire mitigation best practices, mitigation planning, and grid resiliency. NEETSW's recently built WC-B Line was constructed with concrete and steel structures and was designed to meet or exceed industry standard structural guidelines to ensure line resiliency during extreme weather events. NEETSW secured a 150-foot right-of-way and has a very robust vegetation management program in place that utilizes experienced NEETSW affiliate and third-party professional arborists who inspect, monitor, and execute vegetation clearing and maintenance of the ROW as inspection results dictate. NEETSW will inspect this line annually via ground inspections and drones and use LiDAR as needed. If off-ROW trees are deemed unhealthy or leaning toward the ROW, NEETSW will work with landowners to clear any danger timber. Vegetation health inventories on- and off-ROW will be monitored through annual visual and aerial monitored inspections to ensure no trees can become a threat to the operation of the line.

Question A.2

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

Response

As a new transmission-only utility that is currently constructing its first transmission line in the State of Missouri, NEETSW has not yet communicated with state and local governments concerning wildfire risk. NEETSW communicated with both the states of Kansas and Missouri and local governments in these states while siting, permitting, and constructing the WC-B Line.

NEETSW affiliates have experience in communicating with state and local governments regarding wildfires and/or wildfire risk. For example, NEETSW's California-based affiliates own or are developing transmission/substation assets in California and thus maintain mandatory wildfire mitigation plans that were submitted to and approved by the California Public Utilities Commission. Annual reporting updates are required to be submitted, vetted and approved by the Office of Energy Infrastructure Safety of the CPUC. These California affiliates work with local fire agencies to ensure an open line of communication in case of any fires.

Question A.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

Yes, wildfire liability coverage is currently provided through the corporate general liability insurance program maintained by NEETSW's corporate parent company. Coverage availability, terms and limits are reviewed annually at renewal. During annual renewal, insurers request, but do not require, copies of the covered utilities' wildfire-related plans for operational assets and additional information to assess potential wildfire exposure and mitigation measures.

Question A.4

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

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

Response

NEETSW does not have a specific Public Safety Power Shutoff ("PSPS") policy in place regarding the WC-B Line, which is a transmission-only facility that will not be directly connected to or directly serve end-use customers. In the future, NEETSW will coordinate with the interconnected transmission owners, Southwest Power Pool ("SPP"), local utilities, and other stakeholders to coordinate any events calling for public safety power shutoffs.

Question A.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

NEETSW currently follows its affiliate, Lone Star's, Wildfire Response Plan. NEETSW plans to create a specific wildfire mitigation plan ("WMP") for the NEETSW assets within the next six to nine months. NEETSW plans to initiate discussions regarding the WMP with Evergy (which owns the Wolf Creek substation in Kansas) and AECI (which owns the Blackberry substation in Missouri) on the interconnection elements of the WMP, and obtain consensus on the appropriate policies for the safe operation of the line.

Question B.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

NEETSW utilizes two key, patent-pending models developed by its affiliate, NextEra Energy Resources, LLC, that utilize weather forecast (and other) data as critical inputs to help assess wildfire risk across NEETSW's assets.

First, NEETSW produces a Wildfire Risk Index ("WRI") that incorporates hourly weather data, along with other critical information such as land use/cover, vegetation greenness, and soil/fuel moisture to forecast wildfire risk potential for each of the next seven days. WRI forecasts are produced twice daily as new weather data becomes available for assimilation.

Second, NEETSW produces a Wildfire Spread Model ("WSM") that also relies on hourly weather forecast data to predict the spread of wildfires. The WSM automatically kicks off when satellite observing systems identify high confidence hotspots and then is used in conjunction with hourly weather forecast data incorporate variables such as wind speed, wind direction, and land use/cover information to predict wildfire spread.

These two wildfire models have been trained on the historical relationship between weather conditions (among other factors) and historical wildfire spread rates.

Finally, NEETSW is currently planning to deploy a long-term wildfire risk model that will incorporate future climate trends into its long-term risk calculations.

Question B.2

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

Response

As described in the response to Question A.5, NEETSW does not currently have a WMP for its assets but is expecting to develop one within the next six to nine months. However, NEETSW currently forecasts wildfire risk potential out to seven days and forecasts wildfire spread in the event of observed or likely fires, to provide real-time situational awareness to internal stakeholders. NEETSW also analyzes historical wildfire occurrences in proximity to our asset locations pre-construction during the investment approval process.

In addition, and as described in the response to Section B, Question 1, NEETSW is in the process of developing a long-term wildfire risk model that incorporates future climate trends into long-term risk calculations.

Question B.3

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

Response

NEETSW does not currently have an WMP.

Question B.4

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

Response

NEETSW's affiliate has developed two patent-pending models to forecast wildfire risk and predict wildfire spread surrounding its assets, and these models are used by our operational teams daily. These models leverage data from NOAA and third-party produced numerical weather prediction models, NOAA and NASA-based satellites and other open-source data providers. NEETSW's affiliate HWT is a member of the International Wildfire Risk Mitigation Consortium (IWRMC) and the Wildfire Interdisciplinary Research Center (WIRC), which shares best practices, and wildfire research to provide new predictive tools and informed strategies to communities and industry stakeholders, including first responders, those interested in risk analysis, and policymakers in communities, companies, and utilities affected by wildfire.

In addition, as described in NEETSW's response to Question A.1, NEETSW plans to implement the wildfire risk modeling software platform developed by Technosylva, the leader in wildfire science and technology, which offers electric utilities state-of-the-art solutions in wildfire risk mitigation and wildfire risk planning. Working closely with state and federal fire agencies, this technology is validated and updated regularly to offer the latest technology in wildfire spread modeling. Using Technosylva's platform, NEETSW will incorporate dynamic risk analysis, integrating advanced high resolution weather forecasts to derive multi-day asset-risk forecasts quantifying consequence from potential asset-caused ignitions.

Question C.1

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

Response

Temperature, wind speed, wind direction, humidity, cloud cover, recent precipitation, forecasted precipitation, snow cover, and soil moisture are all used in our models to provide wildfire spread forecasts and wildfire risk forecasts.

Satellite-detected hot spots and wildfires, as well as corresponding information like wildfire confidence and fire radiative power, are also collected in real-time.

Question C.2

Describe the types of weather variables collected for forecasting purposes?

Response

Temperature, wind speed, wind direction, humidity, cloud cover, recent precipitation, forecasted precipitation, snow cover, vegetation greenness and soil moisture are all used in our models to provide wildfire risk and wildfire spread forecasts.

Question C.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

Yes, NEETSW downloads and ingests weather forecast data from Vaisala's XWeather API and the National Weather Service's National Blend of Models (NBM), soil moisture from the Climate Prediction Center, vegetation greenness (NDVI) from NASA, and satellite observed hotspots from NOAA/NASA weather satellites (GOES and VIIRS). This information is then utilized in the proprietary wildfire forecasting system that NEETSW is utilizing.

Question C.4

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

Response

Operational teams generally receive situational data through email and text message alerts, which are not automatically integrated into operational systems. However, NEET operations personnel have developed an internal application and user interface to display information regarding Day 1-7 wildfire risk potential, wildfire spread models, various weather observational data (*e.g.*, wind speed, wind direction, temperature, radar reflectivity, lightning, among others), current drought conditions, red flag watches and warnings, among others.

Question D.1

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

Response

NEETSW's WC-B Line does not currently have a WMP. Company assets were designed with consideration for wildfire mitigation. Prioritization is first based upon an understanding of the wildfire risk in the area of the asset, while also aiming to improve public safety, grid reliability, and operational resilience across the service territory. Having strong situational awareness and understanding of the constraints and possible visibility gaps within the area helps guide decisions on what technologies should be incorporated in order to minimize the risk. NEETSW will deploy the necessary hardware and software (Firecaster and Technosylva) oversight and monitor operations to determine if any future enhancements are required. The second step is to incorporate other factors in the decision-making process, including evaluating social vulnerability, the presence of critical facilities in proximity to circuits, and the reliability benefits of performing these mitigations. Potential factors to be considered in the future include facility access constraints, and fire suppression difficulty, among others.

Question D.2

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

Response

Yes. Annual ground/aerial asset and right-of-way (ROW) inspections are separated in time intentionally to get additional visual awareness of the condition of the assets within the ROW at different times of the year. NEETSW ensures Overlap by training its resources to complete asset condition assessments while noting any ROW concerns. Any notice of unusual conditions during these inspections is to be brought to the attention of the NEETSW Operations Lead who will further investigate.

Question D.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 – NEETSW does not plan to deploy covered conductors on its transmission assets at this time.

b.) Fire-resistant poles or hardware – The transmission line structures in Missouri are either monopole steel or concrete and therefore fire-resistant. The hardware is considered fire resistant to certain high temperatures depending on the fire source and length of time the assets remain within the fire.

c.) Remote fault indicators – NEETSW does not own either of the two substations to which the Wolf Creek-Blackberry Transmission Line interconnects, and thus NEETSW does not have information regarding the deployment of remote fault indicators at those stations.

d.) Undergrounding of lines in high-risk areas – NEETSW does not have and has no plans to deploy underground transmission lines at this time regarding its Missouri assets as this geographic area is in a low fire risk area with few historic fires per United States Forest Service maps.

Question E.1

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

Response

Yes, NEETSW has an electronic inventory, including a Geographic Inventory System, of assets for the WC-B Line. All structures and equipment for this line are new and in excellent condition.

Question E.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

The NEETSW maintenance philosophy involves continuous evaluation of equipment using predictive technologies such as thermographic cameras and LiDAR, beginning from the design and manufacturing phase. A formal inspection program will assess equipment conditions in-service, with predictive data aiding future maintenance decisions through statistical process control. Inspection data will be used for risk ranking components and adjusting maintenance schedules. The equipment maintenance and inspection plan addresses transmission lines, fiber optic communications, vegetation management for NERC FAC-003 compliance, ROW, landowner management, environmental compliance, and line protection systems. This philosophy will ensure comprehensive asset care and operational reliability in support of the WMP.

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

Response
NEETSW's assets are currently under construction and will be placed in service by July 15, 2025. The ROW was cleared and will be assessed as required by NERC and the corporate vegetation management plan. Routine inspections will occur via ground patrols, aerial patrols, LiDAR and/or imagery analysis. NERC applicable lines designated as critical to the reliability of the electrical system in the region shall be inspected 100%, at a minimum, annually with no more than 18 months between inspections.

The timing and number of inspections may be adjusted to respond to changing conditions such as fuel loading, heavy rain falls, high winds or icing conditions, wildfires, landowner intervention, and tree mortality.

NEETSW assets are new, and final inspections and equipment condition assessments with the contractor were recently completed and approved. Further condition assessments will be undertaken with the inspection process mentioned above.

Question F.2

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

Response

Yes, NEETSW has the capability to use and will use LiDAR, drones, and/or imagery analysis to support vegetation assessments.

Question G.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

No. At the present time, NEETSW has no substation assets in Missouri and therefore cannot comment upon the current protective equipment needs and device settings related to the protection of our assets. The protection and control of the NEETSW WC-B Line is dependent upon other utilities that own the line's endpoints – Evergy (which owns the Wolf Creek substation in Kansas) and AECI (which owns the Blackberry substation in Missouri). NEETSW's affiliates, however, have substation experience and are very familiar with the options needed or used to implement a WMP (e.g., turn reclosers off, refine trip settings during high fire threat days, PSPS).

Question H.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. NEETSW affiliates have WMPs in place in California and the NEET organization is very familiar with data gathering and retention to meet specific regulatory requirements. NEETSW Operations has a comprehensive data management process for the Missouri assets, which includes GIS data related to pole location, pole type, conductor, right-of-way boundaries and location, access roads, environmental constraints, hardware, insulator and optical groundwire type and location. In addition, wildfire risk area maps, historical fire burns, weather data and ongoing asset and vegetation management inspection information is collected and maintained. This data resides with our NEET Operations Group and will be stored on a password protected Sharepoint site where it can be monitored and updated as asset information changes throughout the project's life cycle.

From day-ahead to week-ahead wildfire risk potential and real-time wildfire spread modeling perspective, various weather, vegetation, and satellite data (described in Sections B and C above) are downloaded, ingested, and stored in cloud-based systems like Amazon Web Services (AWS).

Question H.2

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

Response

NEETSW will utilize an affiliate's existing comprehensive WMP as a template for the WMP for its WC-B Line, modifying the plan for the specific geographic, legal, and regulatory requirements in Missouri.

Question H.3

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

Response

Evaluating data aggregation has not identified any siloed data sources needing integration. All relevant data is effectively shared across departments, ensuring comprehensive decision-making and operational efficiency without isolated information hindering accessibility or analysis.

Question I.1

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

Response

No analysis is required as existing resources are already being utilized in the development and implementation of a NEETSW WMP.

Question I.2

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

Response

As described in the response to Question I.1, existing resources are already being utilized in the development and implementation of a NEETSW WMP. No specific analysis has been undertaken regarding the utilization of existing resource allotments based on varying risk scenarios.

Question I.3

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

Response

No additional resources required to implement a WMP.

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

Response
No. As described above, NEETSW's transmission line in Missouri is currently under construction, but once it is placed in service, NEETSW anticipates implementing and monitoring a WMP consistent with the approved requirements of the Missouri PSC.

Question J.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

NEETSW's WMP and emergency response plan will be tailored to meet the specific requirements of the project's assets and the approved requirements of the Missouri PSC.

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

Response
NEETSW has not participated in any tabletop or full-scale wildfire response exercises with Missouri state or local agencies but would expect to once its line is in service based on the experience of its affiliates. For example, NEETSW's affiliate in California has participated in exercises with CAL-Fire and a private fire brigade to ensure its WMP is compliant and that first responders are educated in the type of assets employed. NEETSW will work with local fire agencies in Missouri to ensure there is a good communication plan in place and an understanding of NEETSW's assets.

Question J.3

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

Response

Yes. NEETSW is currently collaborating with Evergy and AECI to ensure the WC-B line is properly interconnected into their respective substations. Thereafter, NEETSW will have procedures in place for the coordination of safe and reliable operations in accordance with NERC requirements.

Question K.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

NEETSW has not created a formal procedure to share information and support other utilities specifically in Missouri related to wildfires. However, more generally, NEETSW's parent company and affiliates support the nationwide mutual assistance program between utilities.

Question K.2

Please describe if there has been any education or involvement of the public about the various components of an existing (or proposed) WMP.

Response

No, to date there has not been any education or involvement of the public regarding a NEETSW WMP. However, as explained in response to Question A.2, NEETSW affiliates have experience in communicating with state and local governments regarding wildfires and/or wildfire risk.

Question K.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

Yes, NEETSW will share its GIS maps once it has a better understanding of the specific information the State of Missouri requires and how the data is intended to be used. NEETSW's GIS information must remain confidential to ensure compliance with NERC CIP requirements regarding transmission assets.

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 30th day of June, 2025, and electronically delivered to all counsel of record.

/s/ Andrew O. Schulte