

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of ITC Midwest LLC's	)	
Infrastructure Standards Compliance Plan	)	<u>File No. EO-2025-0343</u>
Pursuant to 20 CSR 4240-23.020	)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its *Recommendation* as follows:

1. On June 26, 2025, ITC Midwest LLC ("ITC") filed its 2024 annual Infrastructure Compliance Report in Case No. EO-2025-0343 pursuant to the State of Missouri's Electrical Corporation Infrastructure Standards, 20 CSR 4240-23.020.

2. On June 27, 2025, the Commission ordered Staff to file a recommendation advising approval or rejection of the agreement in this case by July 30, 2025.¹

3. As more fully explained in Staff's Memorandum, attached hereto as Appendix A and incorporated herein, Staff has performed a review of the submitted report and has not identified any deficiencies with respect to the reporting requirements of the rule, i.e., subpart (3)(C). Staff is of the opinion no further action is required by the Commission.

4. Staff also notes that, while Staff's analysis and recommendation are not typically ordered or filed in response to a Utility's Annual Infrastructure Compliance Report, Staff does complete a review of each report filed as required by 20 CSR 4240-23.020(3)(G). If Staff identifies concerns with a specific report, those concerns are addressed by Staff and their Counsel in an appropriate docket for the specific utility in

¹ *Order Directing Filing* filed on June 27, 2025.

question. Depending on other overlapping matters before the Commission, Staff may choose to reserve compliance report concerns to be addressed in other dockets for simplification and to aid the Commission in addressing all Staff's concerns in a single docket, when possible.

WHEREFORE, Staff recommends the Commission accept Staff's recommendation as compliant with the Order and grant such other and further relief, if the Commission deems it appropriate under the circumstances.

Respectfully submitted,

/s/ Tracy D. Johnson

Tracy D. Johnson
Deputy Staff Counsel
Missouri Bar No. 65991
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-5343 (Telephone)
(573) 751-9285 (Fax)
tracy.johnson@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, to all parties or their representatives pursuant to the Service List maintained by the Commission's Data Center for this file, on this 30th day of July, 2025.

/s/ Tracy D. Johnson

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. EO-2025-0343
ITC Midwest LLC's Infrastructure Standards Compliance Plan Pursuant to
20 CSR 4240-23.020

FROM: Claire M. Eubanks, P.E., Engineering Analysis

/s/ Claire M. Eubanks, P.E. / 07/30/2025
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on ITC Midwest's Annual Infrastructure
Compliance Plan

DATE: July 30, 2025

On June 26, 2025, ITC Midwest LLC ("ITC"), in accordance with the requirements of 20 CSR 4240-23.020, filed its annual Electrical Corporation Infrastructure Standards compliance report ("Infrastructure Compliance Report") for calendar year 2024 in EFIS as Case No. EO-2025-0343. Staff has performed a review of the submitted report and has not identified any deficiencies with respect to the reporting requirements of the rule, i.e., subpart (3)(C).

Per 20 CSR 4240-23.020 (3)(C), the following information shall be included in the annual reports, and be filed by no later than July 1st, covering the prior calendar year.

- 1. The report shall identify those facilities that were scheduled for inspection but that were not inspected according to schedule and shall explain why the inspections were not conducted, and provide the electrical corporation's recovery plan to perform the required inspections.*

ITC owns and operates one line in the state of Missouri¹, which ITC reports was inspected via ground patrol for vegetation and line conditions on September 27, 2024.

¹ The Commission granted a CCN for a 161 kV line located in Clark County, Missouri to ITC in case EO-2007-0485.

2. *The report shall also present the total number and percentage breakdown of equipment rated at each condition rating level, including that equipment determined to be in need of corrective action.*

ITC reported that it inspected the entire Carbide-Palmyra 161 kV line, approximately 10 miles, consisting of 97 steel monopole structures and “all equipment was found to be at the highest condition rating level”.

ITC’s report does not specify the total number of overhead equipment (i.e. conductors, insulators). However, other utilities, for transmission inspection programs, similarly report on a per-line basis noting only the equipment in need of correction.

3. *Where corrective action was scheduled during the reporting period, the report shall present the total number and percentage of equipment that was or was not corrected during the reporting period.*

Per ITC’s report, no equipment was in need of corrective action.

4. *For those instances in which equipment was scheduled to have corrective action but the equipment was not corrected during the reporting period, an explanation shall be provided, including a date certain by which required corrective action will occur.*

Not applicable per ITC’s report.

5. *The report shall also present totals and the percentage of equipment in need of corrective action, but with a scheduled date beyond the reporting period, classified by the amount of time remaining before the scheduled action.*

Not applicable per ITC’s report.

6. *All of the above information shall be presented for each type of facility identified in the table, titled “Electrical Corporation System Inspection Cycles (Maximum Intervals in Years).”*

According to the report, ITC has completed an inspection of the entire Carbide-Palmyra 161 kV line in 2024.

7. *If periodic reporting of infrastructure inspection results is required by another governmental entity, those reports shall also be filed at the commission.*

The report has not presented such information, if applicable.

In the Matter of ITC Midwest LLC's)
Infrastructure Standards Compliance Plan) **File No. EO-2025-0343**
Pursuant to 20 CSR 4240-23.020)

[illegible]

Claire M Eubanks
CLAIRE M. EUBANKS, PE

Dianne L. Vaughn
Notary Public

