

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

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

LIBERTY’S COMMENTS

COMES NOW The Empire District Electric Company d/b/a Liberty (“EDE”), The Empire District Gas Company d/b/a Liberty (“EDG”), and Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty (“Midstates”) (collectively “Liberty”), by and through counsel, and for its Comments on the set of best practices for wildfire response and recovery for electrical corporations and gas corporations, Liberty respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Liberty appreciates the opportunity to submit and respectfully submits the following comments in response to the Commission’s October 31, 2025 Order in the above-captioned working case.

Electric Utility Wildfire Emergency Response and Recovery Plans

Essential Elements to Include in Plans:

I. Wildfire Risk Assessment and Emergency Preparation

1. Evaluate whether publicly available fire weather modeling tools, or a combination of publicly available and utility specific modeling will be most useful in analyzing the risk of wildfire.

2. Evaluate the risk specific to the electric utility’s service area. At a minimum evaluate the following factors:

a. Equipment/Assets (e.g. type, age, inspection/maintenance procedures, etc.)

b. Topography

- c. Weather (include statistically extreme conditions and seasonal conditions)
- d. Vegetation
- e. Physical vulnerability (e.g. people, structures, critical facilities/infrastructure)
- f. Access

EDE's Response to Paragraphs 1 and 2:

EDE is committed to investigating fire weather modeling tools and utility-specific risk mapping. This process includes acquiring or developing geospatial data on vegetation density, historical fire events, equipment vulnerability, topography, and local weather patterns. While outside consultation for utility-specific modeling is preferred, EDE believes that, publicly available weather information will be sufficient for real-time risk analysis once models are established.

Coordination with academic institutions, state and local fire agencies, utility trade organizations, and national weather services are essential to adapt best-in-class practices for Missouri's landscape. After evaluating risk factors, EDE will evaluate changes in management strategies, particularly regarding equipment/assets and vegetation. Further clarification from the Commission on "physical vulnerability" and "access" is needed to determine the resources required to evaluate these criteria.

3. Determine what sources of information are needed for advance warning of wildfires, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)

4. Become familiar with functional cellular coverage in advance, to gauge whether additional means of public notification during a wildfire event will be required.

5. Establish internal chain of command prior to a wildfire event.

EDE's Response:

EDE's chain of command for emergency response is defined in the Power Outage Recovery Plan ("PORP"), including implementation procedures, storm categories, position descriptions, and recovery control. The Emergency Operations Center (EOC) structure and Responsible Accountable Consulted Informed (RACI) matrix ensure clear roles and escalation paths. EDE will integrate wildfire-specific protocols into the chain of command as needed.

6. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area.

7. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.

8. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).

EDE's Response to Paragraphs 6 through 8:

Local and state governmental agencies and emergency managers will lead public notification efforts, but in order to plan for coordination with such agencies and emergency managers, an inventory of a utility's service areas' corresponding agencies and emergency managers would be developed. That inventory would be periodically reviewed and updated as needed. Then, regular outreach and potentially coordinated training/simulations could be conducted to further develop the plan. EDE's PORP addresses EDE's internal communication and coordination protocols for emergency events, ensuring effective collaboration with government

representatives and emergency managers. Liberty welcomes opportunities to discuss action plans with state, county, and local emergency managers.

9. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.

EDE's Response:

Currently, EDE utilizes the PORP for emergency situations. The PORP defines trigger thresholds for action, operational escalation steps, and communication protocols to ensure all parties, from line workers to leadership, understand their roles. EDE recognizes the need to develop and incorporate a Wildfire Mitigation Plan into the PORP, tailored to wildfire-specific risks.

10. Evaluate what actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.

EDE's Response:

Outreach and education will be provided, with special attention to medically vulnerable and Access and Functional Need populations. Existing methods of customer communication, like new customer packets and bill onserts, and ONSolve text alerts could be used for such outreach efforts. Communicating both recommended and discouraged actions to customers as preventive actions, while recognizing that evacuation and other public safety measures are best managed by local authorities.

EDE respectfully requests Commission clarification on the extent of customer actions required and the boundary of utility responsibility.

11. Establish and maintain a prioritization matrix for restoration consistent with other applicable tariffs or procedures.

EDE's Response:

EDE maintains logs and records of communications, meetings, notifications, and cost tracking. Agency contact lists are maintained in the PORP. Quality Assurance gates and after-action reviews are conducted per the PORP.

12. Host or participate in annual tabletop training exercises between electric utility staff and responding agencies.

EDE's Response:

EDE supports annual tabletop exercises and suggests joint training with gas and/or water utilities as appropriate, sharing results and insights. More staff and training, including contractors and mutual aid partners, are needed to promote service continuity during wildfires. Liberty also recommends a standardized annual training program for utility workers and contractors to speed up mutual aid and lower ignition risks during restoration.

13. Identify personnel needed within the company and externally to implement each action.

a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.

b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.

c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.

EDE's Response:

EDE will form a cross-functional Wildfire Mitigation Team, including operations, engineering, vegetation management, communications, and emergency management experts. This team will oversee planning, development, training, and coordination with emergency services. Training for contract personnel and mutual assistance partners will need to be standardized across the state to reduce risk during restoration activities.

Inventory management is addressed in the PORP, with strategies for rapid deployment and replenishment of critical equipment. Liberty will assess wildfire-specific inventory needs and welcomes Commission dialogue on sufficiency criteria.

14. Evaluate and anticipate what components would most likely be damaged in a wildfire, in order to decide whether the utility's inventory of spare equipment is sufficient.

EDE's Response:

EDE respectfully requests Commission clarification on the criteria for inventory sufficiency and restoration prioritization.

II. Wildfire Response and Restoration

15. Coordinate with appropriate local public emergency agencies and officials in the immediate aftermath of wildfire.

16. Conduct a damage assessment in wildfire affected areas to determine which facilities will need to be inspected and/or tested prior to re-energizing.

17. Utilize pre-established prioritization matrix to guide restoration activities.

18. Prepare a schedule for testing/replacement of heat affected equipment, components and parts.

EDE's Response to Paragraphs 15 through 18:

All response and restoration procedures are mapped in the PORP. Coordination with local agencies, systematic damage assessment, use of the restoration matrix, and schedules for testing/replacement of heat-affected equipment are standard operating procedures.

Natural Gas Wildfire Emergency Response and Recovery Plans

Essential Elements to Include in Plans:

I. Wildfire Emergency Preparation and Response Procedures

19. Define system isolation zones to which the flow of gas can be isolated.

a. Identify priority customers (e.g. medically vulnerable or critical infrastructure) within each system isolation zone.

b. Determine which valves will need to be operated to isolate each zone, and develop and implement a procedure for inspecting and maintaining the operability and accessibility of these valves.

c. Establish manual shut-in sequence for each isolation area (consideration should be given to potential loss of cellular communication and electrical utilities in wildfire affected areas).

EDG & Midstates' Response:

a. EDG and Midstates does not have any priority customers mapped or specially identified in GIS but is amendable to exploring the additional resources and timeframe to complete such identification.

b. EDG and Midstates has installed critical valves to isolate each zone, which are mapped in GIS, and such valves are inspected annually. A manual process is used to determine which valves will need to be operated to isolate each zone.

c. Depending on the area at risk of the wildfire, would determine the sequence of valve isolation.

20. Determine what sources of information are needed for advance warning of wildfire, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)

EDG & Midstates' Response:

EDG and Midstates do not currently monitor wildfire risk, but agree it is appropriate to include in a Wildfire Mitigation Plan ("WMP") monitoring weather forecasts and fuel conditions to inform fire danger. Like EDE, EDG and Midstates support using publicly available meteorological information as much as possible to avoid additional costs to be passed on to customers. EDG and Midstates have an Emergency Management Plan that addresses natural disasters, including wildfires.

21. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area. Consideration should be given to loss of cellular and electrical services in wildfire affected areas.

EDG & Midstates' Response:

EDG and Midstates have an Emergency Management Plan that addresses communication during all emergencies, and it assumes cellular services is available. EDG and Midstates support exploring how to supplement the communication process to address loss of cellular and electrical services in wildfire affected areas.

22. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.

EDG & Midstates' Response:

EDG and Midstates agree this point should be addressed in a WMP and should be discussed in any coordinated trainings with emergency operation center/managers.

23. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).

EDG & Midstates' Response:

EDG and Midstates' Emergency Management Plan identifies five different threat levels with corresponding internal actions. However, EDG and Midstates support adding this point to a WMP and coordinating with local emergency managers/officials to confirm what should be included in the WMP.

24. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.

EDG & Midstates' Response:

To reiterate, EDG and Midstates supports adding this point to a WMP and coordinating with local emergency managers/officials to confirm what should be included in the WMP.

25. Evaluate what actions the Company would desire customers to take in response to each threat level and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.

EDG & Midstates' Response:

While emergency officials/agencies would be best equipped to communicate many actions to customers in emergency wildfire circumstances, EDG and Midstates acknowledges coordination with those emergency officials/agencies is very important. Education/outreach to customers about wildfire issues and actions could be cost-effectively communicated through new customer handbooks, bill inserts, and potentially ONSolve text alerts.

26. Identify personnel needed within the company and externally to implement each action.

a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.

b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.

c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.

EDG & Midstates' Response:

a & b. EDG and Midstates have an Emergency Management Plan that addresses communication during all emergencies, and it assumes cellular service is available. EDG and Midstates supports exploring how to supplement the communication process to address loss of cellular and electrical services in wildfire affected areas.

c. EDG and Midstates currently participate in mutual assistance arrangements, which cover all emergencies.

II. Wildfire Restoration Procedures

27. Coordinate with appropriate local public emergency agencies and officials prior to intentional purging, venting or flaring natural gas in the immediate aftermath of wildfire.

EDG & Midstates' Response:

When purging gas, EDG and Midstates will follow their O&M plan, Section 11-H.

28. Establish a prioritization matrix for restoration. Consideration should be given to priority customers.

EDG & Midstates' Response:

EDG and Midstates' Emergency Management Plan at Section H talks about the restoration of priority customers. EDG and Midstates does not have any priority customers mapped or specially identified in GIS but is amendable to exploring the additional resources and timeframe to complete such identification.

29. Conduct a damage assessment in wildfire-affected areas to determine which facilities will need to be inspected and/or tested prior to reintroducing gas, and which will need to be removed and replaced. At a minimum, consideration should be given to:

- a. Regulator station piping, internal components, supports, insulation, enclosures, monitoring, control, and communication equipment,
- b. Customer meters, service regulators, relief valves, and anodeless risers,
- c. Cathodic protection test stations, rectifiers, and electrical panels,
- d. Sensing, control and communications equipment, gauges, and pressure recording devices, and
- e. Shallow buried plastic pipelines, anodeless risers, and encased plastic pipelines on bridges or at aboveground terminations.

EDG & Midstates' Response:

EDG and Midstates will patrol all areas that were directly affected by wildfire and address any concerns before introducing gas back into the system.

30. Prepare a schedule for testing/replacement of heat-affected equipment, components and parts.

EDG & Midstates' Response:

The procedures for testing/replacing equipment, components, and parts are set out in EDG and Midstates' O&M (particularly Section 6) and construction procedures, measurement manual, and material specifications sheet.

In conclusion, Liberty is committed to building a comprehensive wildfire mitigation and monitoring program, delivering the highest standards of safety and transparency for our customers and the communities we serve. We look forward to working closely with the Commission and all stakeholders to build a resilient future together.

Respectfully submitted,

/s/Jermaine Grubbs

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 12th day of December, 2025, with notification of the same being sent to all counsel of record.

/s/ Jermaine Grubbs