

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

File No.

Respondent,

(PSC fills this in)

FORMAL COMPLAINT

(Zip Code)

(Zip Code)

PUBLIC

3. Respondent's address is:

One Kansas City Place, 1200 Main Street, P.O. Box 418679

(Address of respondent)

Kansas City

(City)

Missouri

(State)

64105

(Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. The amount at issue is: \$ **Unspecified**

(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

This new complaint is in regard to Evergy Missouri West's ("Evergy") Fayetteville Transmission Line Relocation project, and pursuant to the PSC's December 19, 2024 Order Dismissing Complaints (Case No. EC-2024-0015 / EFIS Docket #139), acknowledging PSC authority to determine whether a violation of CCN orders has been made.

I am requesting the PSC to:

--Open this new complaint case (involving the same violations as in Case No. EC-2024-0015)

--Order Evergy Missouri West to comply with, adhere to and not exceed NESC standards and CCN 9470 Orders. MoDOT is not forcing or otherwise requiring Evergy to depart from the MoDOT right-of-way/utility corridor with regard to Evergy's project.

--Order Evergy to immediately provide, via EFIS, detailed monthly status reports of its subject project until completion.

--Order and schedule an evidentiary hearing to consider all evidence and facts presented in all former and current complaints related to the subject project (EC-2024-0015, EC-2026-0350, this new case and all other subsequent cases filed).

--Without knowledge of its final engineered approvals, it is literally impossible for the PSC to evaluate and make orders involving ALL violations of Missouri statutes, regulations or Orders. Please order Evergy to provide a complete engineering plan, including the vertical line clearance at the largest vertical sag (vertical clearance should be measured at the lowest point of sag within the span to the surface directly below.)

--Please provide (or order Evergy to provide) any PSC-granted variances or exceptions for this project.

Despite Evergy's statements otherwise, its project has been active and remains active since its 2023 public presentation, and since 38 complaints from neighboring landowners were filed in July 2023.

https://web.archive.org/web/20260000000000*/https://www.evergy.com/partner-with-us/transmission-projects/fayetteville

7. The relief requested is appropriate because Respondent has violated a statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

Evergy Missouri West's ongoing Fayetteville project, initiated in 2023, is violating CCN 9470 as found in the PSC Staff's Investigation Recommendation, Schedules and Report (Case No. EC-2024-0015 / EFIS Docket #57) as well as ordered paragraph 2 in CCN 9470 as it relates to the National Electric Safety Code. The current rule is contained in 20 CSR 4240-18 Safety Standards. The PSC staff stated it is not aware of Evergy Missouri West receiving a Commission-ordered variance from any part of the NESC, nor is it aware of any exception granted to CCN Order 9470.

Pursuant to RSMo.386.570.1, if violation(s) of any order, decision, decree, rule, direction, demand or requirement, or any part or provision thereof, is found, the PSC is requested to order the appropriate penalties be paid.

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8. The Complainant has taken the following steps to present this matter to the Respondent:

(Please describe in detail what steps you have already taken to resolve this complaint.)

Please refer to the EFIS Docket in Case No. EC-2024-0015 and Case No. EC-2026-0350 for supporting documentation and evidence filed in support of complaints and with regard to Evergy's business conduct for its ongoing transmission line relocation project.

It may be expedient to consolidate this complaint with EC-2026-0350 where there are common questions of law and fact. Doing so would be administratively expedient in that it would simplify the filings to be made by all parties to these matters.

To date, despite repeated requests, Evergy has failed to provide the requested finalized engineering plan. Without this information, Evergy cannot establish an NESC-based requirement in proving a need for exceeding NESC clearances and leaving the MoDOT right-of-way/utility corridor.

August 23, 2026

Date

Denise Wray Allegri

E-Signature of Complainant

Complainant's Phone Number

Denise Wray Allegri

Complainant's Printed Full Name

Alternate Contact Number

Complainant's E-mail Address

*Attach additional pages, as necessary. Attach **copies** of any supporting documentation. Do **not** send **originals** of any supporting documentation.*

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