

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

FILED
August 31, 2026
Missouri Public
Service Commission

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

Stephen L. Robertson

(Your name here)

Complainant,

v.

Evergy Missouri West, Inc

(Utility's name here)

Respondent,

File No.

(PSC fills this in)

FORMAL COMPLAINT

1. Complainant resides at:

[REDACTED]

(Address of complainant)

[REDACTED]

(City)

[REDACTED]

(State)

[REDACTED]

(Zip Code)

2. The utility service complained of was received at:

a. Complainant's address listed in paragraph 1.

b. A different address:

[REDACTED]

(Address where service is provided, if different from Complainant's address)

[REDACTED]

(City)

[REDACTED]

(State)

[REDACTED]

(Zip Code)

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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 complaint is in regard to Evergy Missouri West's Fayetteville Transmission Line Relocation project. Despite Evergy's statements otherwise, its project has been active and remains active since its 2023 public presentation. https://web.archive.org/web/20260000000000*/https://www.evergy.com/partner-with-us/transmission-projects/fayetteville

I am requesting the PSC to:

1. 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.
2. Order Evergy to provide a complete engineering plan for this project, including for the full length of the project the vertical line clearances at the largest vertical sag. Vertical clearances should be measured at the lowest point of sag within the span to the surface directly below.
3. Please provide (or order Evergy to provide) any PSC-granted variances or exceptions for this project.

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 they are placing lines and poles in violation of CCN 9470. Specifically, the ordered paragraph 2 in CCN 9470 relates to the National Electric Safety Code. Since 1978, the MPSC has adopted parts of the National Electric Safety Code (NESC) in its rules. The current rule is contained in 20 CSR 4240-18 Safety Standards. The MPSC staff stated they are not aware of Evergy Missouri West receiving a Commission-ordered variance from any part of the NESC. Nor are they aware of any exception granted to CCN Order 9470. In certain areas of the Fayetteville Project, along MO-13, the Missouri Department of Transportation, through planning with all impacted utilities, secured an additional two feet of easement to accommodate Evergy line and pole placements. MoDOT has accommodated Evergy line and pole placements to remain within the MoDOT right-of-way.

The Evergy Fayetteville project has remained active since its 2023 public presentation per https://web.archive.org/web/20260000000000*/https://www.evergy.com/partner-with-us/transmission-projects/fayetteville

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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.)

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.

8-28-2026
Date

Stephen L. Robertson
E-Signature of Complainant

[REDACTED]
Complainant's Phone Number

Stephen L. Robertson
Complainant's Printed Full Name

Alternate Contact Number

[REDACTED]
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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