

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**

Betty L. Beyers

(Your name here)

Complainant,

v.

File No.

Evergy Missouri West, Inc

(Utility's name here)

Respondent,

(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)

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 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

PUBLIC

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.

Date 8/28/2026

[REDACTED]
Complainant's Phone Number

Alternate Contact Number

Betty L. Beyers
E-Signature of Complainant

Betty L. Beyers
Complainant's Printed Full Name

[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.*

PUBLIC

Addendum to complaint:

On August 29, 2026, at my [REDACTED]' residence, I met with Evergy attorney, Zachary Roeschlein and two of his land agents, Lisa White and Joe Culp. The purpose of the meeting was to negotiate acquisition of my land but they are not willing to provide details such as the clearance distance of the new power lines to the roadway below.

The only authority who governs over Evergy is the Missouri Public Service Commission. The circuit courts assume the MPSC oversees and approves the projects Evergy deems are needed and the courts assume the MPSC oversees Evergy and upholds the limits and requirements of the National Electrical Safety Code, Commission Orders specific to Evergy and CCN 9470.

I desperately need the Missouri Public Service Commission to investigate and clarify if Evergy is seeking excessive line clearances per the NESC. As stated previously, the courts presume, as they should, that the MPSC governs and oversees all aspects of Commission Policy, adherence to Commission orders and ensures the utility is acting properly.

The checks and balances for Evergy rest solely upon the MPSC and if needed, my attorney. Should Evergy maintain its refusal to provide the measurement clearances of their lines to the nearest roadways I'm unable to form a value of the land they may need based upon the NESC and CCN 9470.

For example if the NESC states that power lines must be no closer than 18 feet from the ground, and that is achieved through lines and or poles upon the MoDOT utility corridor, why would it be necessary for Evergy to place lines up to 20 feet away horizontally? The NESC standard is achieved without moving the lines outside the MoDOT right of way.

I know the National Electrical Safety Code establishes power line swing clearances at roughly 18 feet. My concern is that Evergy is seeking clearances beyond what the NESC requires.

The benefit to Evergy in placing poles outside the MoDOT right of way is that in placing poles upon their own acquired private easement, should MoDOT widen the road and require Evergy to move their lines the full cost of the pole movement is the responsibility of MoDOT.

Per MoDOT, in this case, Evergy lines outside of the MoDOT right of way will likely cost Missouri needless millions in the future.

Thank you for your time and consideration,

Betty L Beyers
[REDACTED]

PUBLIC