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June 26, 2025

Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102

Re: Ameresco Jefferson City LLC
PHMSA OPID No. 32435
File/Case No. OW-2025-0314

To whom it may concern,

In response to the Commission's May 14, 2025 order for utility stakeholders to provide information regarding wildfire mitigation preparedness, Ameresco has completed "Attachment B Questions for Gas Corporations", which is attached for your review and use in developing best practices.

If you have questions or need further information, please contact me at (508) 598-4382.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mr. Robert Meharg".

Mr. Robert Meharg
Vice President - Asset Operations
Authorized Representative
Ameresco Palmetto LLC

cc: H. Stewart, C. Bailey, J. Quarles, R. Peary, F. Terry, R. Tindall – Ameresco

QUESTIONS FOR GAS CORPORATIONS**A. General**

1. Please explain how the threat of wildfires is addressed in Emergency Plans (see 20 CSR 4240-40.030(12)(J) for emergency plan requirements). Does your Emergency Plan include wildfire-specific triggers, response timelines, or communications protocols? If so, please describe.

Ameresco's OM&E Manual does not address wildfire as a specific abnormal operation. Section 2- Abnormal Operations identifies emergency conditions that result in immediate action. Those include natural disasters and fire that is not related to the pipeline. Section 2.4 details procedures for abnormal conditions including recognition, initial response, communication & notifications, corrective actions, documentation, and investigation & review.

2. Have you met with local emergency responders (e.g. fire, police) to discuss coordinated responses to wildfires (see 20 CSR 4240-40.030(12)(J)1.B.)? If "yes", please describe the outcome of these meetings.

No, not specifically for wildfires.

Pursuant to 20 CFR 4240-40.030(12)(J)(1)(b), Ameresco conducts liaison efforts utilizing in-person meetings with Emergency Officials when possible.

Ameresco also utilizes Paradigm for Public Awareness efforts and participates in Paradigm's coordinated liaison meetings with Emergency and Public officials.

3. Have you provided any information or instructions to your customers regarding actions that should be taken with respect to natural gas service in the event of wildfire evacuations (e.g. closing valve at service riser)? If "yes", please explain what actions you have recommended, and also please explain how this information is disseminated (e.g., door tags, emergency preparedness mailers, website alerts)?

No. Ameresco does not have natural gas customers.

4. Have you evaluated the temperature ratings of your above ground natural gas or renewable natural gas assets (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the following:

a.) Ability of above ground pressure reduction equipment (e.g. regulator stations and farm taps) to control downstream pressure if involved in a fire? If "yes", please describe the outcome of that evaluation.

All above ground pipeline equipment is located in access controlled, maintained, gravel lots free from combustible materials that prevents damage from wildfires.

b.) Ability of service regulators to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.

All above ground pipeline equipment is located in access controlled, maintained, gravel lots free from combustible materials that prevents damage from wildfires.

c.) Potential disruptions in SCADA (supervisory control and data acquisition) communications between monitored and controlled physical assets and control room.

All above ground pipeline equipment is located in access controlled, maintained, gravel lots free from combustible materials that prevents damage from wildfires.

Ameresco pipelines are monitored from our plant, however in the event of an abnormal operation, the pipeline is controlled by manual valves.

5. Have you evaluated the temperature ratings and burial depths of your plastic piping systems with respect to the potential for heat damage if ground surface above is involved in a wildfire? If “yes”, please describe the outcome of that evaluation.

Ameresco pipelines are buried at depths prescribed by 49 CFR 192.327.

All above ground pipeline equipment is located in access controlled, maintained, gravel lots free from combustible materials that prevents damage from wildfires.

6. Have you evaluated the temperature ratings of your natural gas or renewable natural gas assets in vaults (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the ability of pressure

reduction equipment to control downstream pressure in the event of a wildfire at ground surface? If “yes”, please describe the outcome of that evaluation.

No. Ameresco does not have vaults.

7. Do you partner with fire departments or other agencies to communicate and respond to fires and wildfires? If yes, please explain.

No

8. Do you have insurance coverage for wildfire damage? If “yes”, does your insurance coverage require you to have a wildfire mitigation plan or make any special preparations regarding wildfires? If not currently insured against wildfire risk, please explain why and whether coverage has been denied or deemed unavailable or uneconomical.

Yes, Ameresco has insurance coverage for wildfire damage but wildfire mitigation or any other special preparation plans are not required.

B. Natural Gas and Renewable Natural Gas Distribution Systems

1. Does your current Distribution Integrity Management Plan (DIMP) address the threat of wildfires? Please explain.

Ameresco does not have distribution.

C. Natural Gas and Renewable Natural Gas Transmission Systems

1. How is the threat of wildfires addressed in your transmission integrity management program?

Pursuant to 49 CFR 192.917, Ameresco evaluates pipelines annually for potential threats. Wildfires have not been identified as a time-dependent threat based on historical fire data.

D. Infrastructure Resilience & Risk Assessment

1. What steps have you taken to assess wildfire risks near pipelines and critical infrastructure?

Pursuant to 49 CFR 192.917, Ameresco evaluates pipelines annually for potential threats. Wildfires have not been identified as a time-dependent threat based on historical fire data.

2. How do you protect gas transmission and distribution systems from wildfire damage?

Ameresco pipelines are buried at depths prescribed by 49 CFR 192.327.

All above ground pipeline equipment is located in access controlled, maintained, gravel lots free from combustible materials that prevents damage from wildfires.

3. Are there plans to upgrade or harden gas infrastructure in wildfire-prone areas?

No

4. Have you identified high-risk zones where wildfire-related damage to gas pipelines is most likely?

Ameresco has not identified any high-risk zones. Wildfires have not been identified as a time-dependent threat based on historical fire data.

E. Emergency Response & Safety Protocols

1. What protocols are in place for shutting down gas service in areas threatened by wildfires?

Wildfires have not been identified as a time-dependent threat based on historical fire data, however Ameresco will shut down the entire pipeline during any abnormal operation event that poses a threat to the persons or property.

2. Do your emergency procedures address isolating gas to specific locations by use of below-ground inlet valves at district regulator stations? If “no”, please explain what alternative measures you could use to isolate the flow of gas to specific locations during a wildfire event.

No, Ameresco will shut down the entire pipeline during any abnormal operation event that poses a threat to the persons or property.

3. How do you coordinate emergency response efforts with fire departments and local agencies?

Pursuant to 20 CFR 4240-40.030(12)(J)(1)(b), Ameresco conducts liaison efforts utilizing in-person meetings with Emergency Officials when possible.

Ameresco also utilizes Paradigm for Public Awareness efforts and participates in Paradigm's coordinated liaison meetings with Emergency and Public officials.

4. Have you coordinated with emergency management to ensure that critical infrastructure is continuously supplied in the case of damage to gas supply infrastructure or the need for shutoff?

Ameresco does not supply critical infrastructure.

5. How quickly can you restore gas service after wildfire-related disruptions?

Ameresco does not supply critical infrastructure or natural gas customers. In the event of unlikely damage to the Ameresco pipeline, the time of restoration is dependent upon the extent of damage.

6. What measures are taken to prevent underground pipelines from being compromised by extreme heat?

Ameresco pipelines are buried at depths prescribed by 49 CFR 192.327.

F. Pipeline Integrity & Post-Wildfire Damage Assessments

1. What inspections are conducted to ensure gas pipeline integrity after a wildfire?

As prescribed the OM & E Section 2.12, following an abnormal operations event, personnel must verify the abnormal conditions or issues have been resolved, and the pipeline can operate safely. This includes pipeline patrols, leakage surveys, inspecting safety valves and verifying pressure transmitters.

2. How do you monitor and prevent leaks or explosions caused by wildfire-damaged infrastructure

Ameresco will shut down the entire pipeline during any abnormal operation event that poses a threat to the persons or property. The pipeline will not return to service until any necessary repairs are completed.

3. Are there contingency plans for replacing pipelines in fire-damaged areas?

In the event that any portion of any Ameresco pipeline is found to be damaged, leaking, or compromised in any other way, personnel shall shut down and evacuate the pipeline. Management will coordinate for repair to be made as soon as possible as detailed in OM&E Section 2.3 Pipeline Repair Procedures.

G. Customer Communication & Public Safety

1. How do you notify customers of wildfire-related service disruptions or potential safety hazards?

Ameresco does not have natural gas customers.

2. What public education efforts are in place to inform customers about wildfire-related gas safety measures?

Ameresco does not have natural gas customers.

3. Are customers provided with clear guidance on when and how to shut off their gas supply during a wildfire?

Ameresco does not have natural gas customers.

4. Are emergency contact procedures clearly communicated to residents in wildfire-prone regions?

Ameresco provides contact information to all stakeholders along the pipeline as part of the Public Awareness Program as required by 49 CFR 192.616.

5. Do you have a policy with regards to medically vulnerable or critical infrastructure customers and are they prioritized for communication or assistance?

Ameresco does not provide service to medically vulnerable or critical infrastructure customers.

6. Do you provide specific guidance to businesses and industrial users on wildfire-related gas safety? Please share specifics.

No

H. Mutual Aid Agreements & Industry Cooperation

1. Do you participate in mutual aid agreements with other gas providers for emergency response? Please provide a copy of a current agreement.

No

2. How do you coordinate with electric utilities to prevent infrastructure conflicts during wildfire mitigation efforts?

No

3. Are there standardized protocols for sharing wildfire risk data with other utilities and emergency responders?

No