



CITY OF LEBANON, MISSOURI • INCORPORATED 1877

June 24, 2025

Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101

To Whom It May Concern,

I am writing to submit the completed Wildlife Mitigation Questionnaire in connection with File No. OW-2025-0314.

We appreciate the opportunity to contribute to the development of best practices for utility wildfire mitigation in Missouri.

Should you have any questions or require further information, please do not hesitate to reach out. I will provide additional details or clarification as needed.

Sincerely,

Travis W. Long  
Electric Superintendent

## A. Foundational Questions

1. Describe and document how current policies, procedures, and plans consider the risks of wildfires. In your response, specifically consider the current vegetation management plan, policies and procedures regarding infrastructure inspection standards, and other emergency or restoration plans. **There are currently no policies or procedures in place for the risks of wildfire as it pertains to the City of Lebanon Electric Department.**
2. Describe your experience communicating with state and local governments regarding wildfires and/or wildfire risk in your service territory. **There has been no communication regarding wildfires.**
3. Do you have insurance coverage for wildfire damage? **Yes** If yes, does your insurance coverage require you to have a wildfire mitigation plan (WMP) or make any special preparations regarding wildfires? **No** Please explain.
4. Have you developed a Public Safety Power Shutoff (PSPS) policy with respect to wildfires? If a PSPS policy exists, please describe: **City of Lebanon does not have a PSPS policy for wildfires.**
  - a. How customers are notified.
  - b. Whether medically vulnerable or critical infrastructure customers are prioritized for communication or assistance.
  - c. How commercial and industrial or other customer types are notified.
5. If you do not currently have a wildfire-specific policy or WMP, do you plan to develop one? What is the anticipated timeline? **No**

## B. Risk Assessment & Mapping

1. Please explain, for planning purposes, your ability to reliably model various climate and weather scenarios. Specifically, discuss your ability to understand how changing weather patterns impact wildfire risk across your grid. **I do not try to model any weather patterns that would impact wildfire risks. I use the information from The National Weather Service.**
2. If you have implemented a WMP, what types of climate and weather scenarios have been modeled? **We do not have a WMP.**
3. Have you included sources of ignition from external causes when developing the WMP? **No**
4. Are there any utility-owned models or partnerships (e.g., with universities or

NOAA) for fire spread or risk prediction? **Not that I am aware of.**

### **C. Situational Awareness & Forecasting**

1. Describe the types of weather variables collected for your situational awareness during weather or other unforeseen events, including wildfires. **Barometric Pressure, Humidity, Wind shear, and Dew point for storm situations.**
2. Describe the types of weather variables collected for forecasting purposes. **Barometric Pressure, Humidity, Wind shear, and Dew point for storm situations.**
3. Do you use third-party weather services or modeling software (e.g., IBM's Weather Company, NCAR tools) for predictive analytics related to wildfire conditions? **No**
4. How is situational data integrated into operational systems (e.g., SCADA, ADMS)? **Meter data – Sensus shows air temperature that relates to KWH usage.**

### **D. Grid Design & System Hardening**

1. Please describe how you prioritize WMP initiatives across your service territory. **We do not prioritize WMP in our service territory at this time.**
2. Have any overlap with components of your vegetation management or major asset maintenance plans been identified? If so, please explain. **No.**
3. Please describe if you have deployed or plan to deploy:
  - a.) Covered conductors. **Yes we have deployed and plan to deploy more.**
  - b.) Fire-resistant poles or hardware. **Yes, we have Fire-resistant poles and hardware and plan to deploy more.**
  - c.) Remote fault indicators. **Yes, we have underground and overhead fault indicators on our distribution system with the intent to deploy more.**
  - d.) Undergrounding of lines in high-risk areas. **No**

### **E. Asset Management & Inspections**

1. Has an inventory of assets and a condition rating of those assets been conducted? **Yes**
2. Describe how your inspection practices, including, but not limited to, inspections conducted pursuant to 20 CSR 4240-23.020, may be leveraged

for development of a WMP. A system inspection is completed on a five-year cycle by a contracted third-party engineering firm.

## **F. Vegetation Management & Inspections**

1. What level of vegetation inventory and condition assessments have been made within your service area? We have internally inspected all of our transmission and distribution lines in the past 5 years. The data we receive from those inspections is passed along for our feeder clearing program.
2. Do you use remote sensing (LiDAR, satellite, or drone imagery) to support vegetation assessments? Yes

## **G. Grid Operations & Protocols**

1. Has an analysis been made of the various protective equipment and device settings that would be needed or used to implement a WMP? No

## **H. Data Governance**

1. Have you considered what types of data it would be necessary to utilize for the implementation of a WMP, and how and where that data would be stored? If so, please explain. No
2. Have you analyzed existing data, or collected new data to be used in developing and implementing a WMP? No
3. Have you evaluated data aggregation and identified any sources of data that are siloed which need to be incorporated? No

## **I. Resource Allocation Methodology**

1. Has an analysis been conducted that would designate how existing resources could be utilized in the implementation of a WMP? No
2. Has any analysis been done of utilization of the existing resource allotment based on varying risk scenarios? No
3. Have any additional needed resources required to implement a WMP been identified? No
4. Are there internal or external constraints limiting the ability to fully implement a WMP? No

## **J. Emergency Planning & Preparedness**

1. If a WMP has been created, please describe if or how it has been integrated with any other overall disaster or emergency plans (prepared by any State or local entity). **A WMP has not been created**
2. Do you participate in annual tabletop or full-scale wildfire response exercises with state or local agencies? **No**
3. Have you collaborated with investor owned utilities, rural electric cooperatives and/or municipally owned electrical suppliers for communication and integrating emergency plans? **No**

## **K. Stakeholder Cooperation & Community Engagement**

1. Has a procedure been developed to share information and support other utilities your utility coordinates with, including rural electric cooperatives and/or municipally owned electrical suppliers? **No**
2. Please describe if there has been any education or involvement of the public about the various components of an existing (or proposed) WMP. **No**
3. Are you willing to share your GIS system maps with the Missouri Public Service Commission and/or State Emergency Management Agency during emergencies? If no, please explain why. If you would be willing but there are constraints, please specifically explain them with citations if necessary. **Yes, we would share our GIS maps with both of the agencies mentioned above.**