

In the Matter of the Establishment of a)	
Working Case for the Development of Best)	File No. OW-2025-0314
Practices for Wildlife Mitigation in Missouri)	

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.**

Answer: Liberty Utilities (Midstates Natural Gas) Corp. ("Midstates") and The Empire District Gas Company ("EDG") do not specifically discuss wildfires in their emergency plans. However, Midstates and EDG's emergency plans do address fires directly involving pipeline facilities.

- 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.**

Answer: As part of Midstates and EDG's public awareness programs, the Companies correspond with local emergency responders generally regarding the properties of natural gas, combustibility, etc., but have not met with emergency responders to discuss wildfires specifically.

- 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 please explain how this information is disseminated (e.g. door tags, emergency preparedness mailers, website alerts)?**

Answer: As part of Midstates and EDG's public awareness programs, the Companies correspond with customers generally regarding the properties of natural gas, combustibility, what to do if the odorant for natural gas is smelled, etc. The Companies do not provide anything specifically related to wildfires to 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.
 - b. Ability of service regulators to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.
 - c. Potential disruptions in SCADA (supervisory control and data acquisition) communications between monitored and controlled physical assets and control room.

Answer: The specifications of assets are reviewed for compliance with applicable codes, but the Companies are not aware of a temperature rating requirement under applicable codes. The Companies’ above-ground assets (regulator stations, farm taps, etc.) are not in woodland or brush areas where wildfires may be more likely to occur.

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.

Answer: The specifications of assets are reviewed for compliance with applicable codes and the depth of cover for installation of facilities are confirmed for compliance with applicable codes. The Companies are not aware of a temperature rating or depth of cover other than initial installation requirements under applicable codes.

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.

Answer: Not applicable. The Companies do 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.

Answer: As part of Midstates and EDG’s public awareness programs, the Companies correspond with local emergency responders generally regarding the properties of natural gas, combustibility, etc. The Companies are usually called when a structure fire occurs, and natural gas facilities are found on the property. However, there have been rare instances when the fire department did not contact the Company on a structure

fire. The Companies are not aware of any wildfires in their service areas in the last 13 years.

The Companies' website presents information and videos for "First Responders Safety" at <https://missouri.libertyutilities.com/butler/residential/safety/natural-gas/first-responders.html>.

- 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.**

Answer: Midstates and EDG do not have WMPs and have not been required to have a WMP or special preparation regarding wildfires.

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.**

Answer: Currently, Midstates and EDG's DIMP plans do not address wildfires as wildfires have not been considered a significant threat to the Missouri systems.

C. Natural Gas and Renewable Natural Gas Transmission Systems

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

Answer: Currently, Midstates and EDG's TIMP plans do not address wildfires as wildfires have not been considered a significant threat to the Missouri systems.

D. Infrastructure Resilience & Risk Assessment

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

Answer: Wildfires have not been identified as a significant risk for our natural gas systems, but natural forces generally are included in the Companies' risk matrix.

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

Answer: Wildfires have not been identified as a significant risk for our natural gas systems.

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

Answer: Wildfires have not been identified as a significant risk to the Companies' natural gas systems and there are no plans currently to upgrade the gas infrastructure for wildfires.

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

Answer: No, wildfires have not been identified as a significant risk to the Companies' natural gas systems.

E. Emergency Response & Safety Protocols

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

Answer: Midstates and EDG do not specifically discuss wildfires in their emergency plans. However, Midstates and EDG's emergency plans do address fires directly involving pipeline facilities which describe the isolation or shut down of systems using system maps.

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.

Answer: Yes.

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

Answer: As part of Midstates and EDG's public awareness programs, the Companies correspond with local emergency responders generally regarding the properties of natural gas, combustibility, etc. The Companies hold annual public awareness liaison meetings through a third party.

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?

Answer: As part of Midstates and EDG's public awareness programs, the Companies correspond with local emergency responders generally regarding the properties of natural gas, combustibility, etc. the Companies hold annual public awareness liaison meetings through a third party.

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

Answer: Restoration timeframes depend on multiple factors, including the size of the outage.

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

Answer: The Companies' underground pipelines are installed to a depth in accordance with applicable codes, and extreme heat from wildfires has not been identified as a significant risk to the Companies' gas systems.

F. Pipeline Integrity & Post-Wildfire Damage Assessment

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

Answer: Midstates and EDG are not aware of any wildfires occurring in the last 13 years in their service areas so have not considered any of their areas at risk of wildfire. The Companies perform regular leak surveys and patrols.

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

Answer: Wildfires have not been identified as a significant risk for the Companies' natural gas systems, but natural forces generally are included in the Companies' risk matrix. The Companies perform regular leak surveys and patrols.

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

Answer: The Companies' underground pipelines are installed to a depth in accordance with applicable codes, and extreme heat from wildfires has not been identified as a significant risk to the Companies' gas systems. Midstates and EDG are not aware of any wildfires occurring in the last 13 years.

G. Customer Communication & Public Safety

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

Answer: As part of Midstates and EDG's public awareness programs, the Companies generally correspond with customers regarding the properties of natural gas, combustibility, what to do if the odorant for natural gas is smelled, etc. The Companies do not provide customer notifications specifically related to wildfires to natural gas customers.

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

Answer: As part of Midstates and EDG's public awareness programs, the Companies generally correspond with customers regarding the properties of natural gas, combustibility, what to do if the odorant for natural gas is smelled, etc. The Companies do not provide customer notifications specifically related to wildfires to natural gas customers.

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

Answer: As part of Midstates and EDG's public awareness programs, the Companies generally correspond with customers regarding the properties of natural gas, combustibility, what to do if the odorant for natural gas is smelled, etc. The Companies do not provide customer notifications specifically related to wildfires to natural gas customers. However, if gas supply does need to be shut off within the respective Companies service area the Company has directed their customers to notify Midstates or EDG of such need and a field crew from the respective Company is dispatched for such work.

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

Answer: A special emergency phone number is available and communicated to customers in accordance with the Companies' public awareness programs.

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

Answer: Customer accounts that are identified as critical infrastructure are prioritized for communication and assistance.

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

Answer: As part of Midstates and EDG's public awareness programs, the Companies generally correspond with customers regarding the properties of natural gas, combustibility, what to do if the odorant for natural gas is smelled, etc. The Companies do not provide customer notifications specifically related to wildfires to natural gas customers.

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.**

Answer: Yes. Attached is a copy of the current agreement, which is confidential pursuant to Commission Rule 20 CSR 4240-2.135(2)(A)6.

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

Answer: The Companies are not aware of any wildfires in their service areas in the last 13 years.

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

Answer: Midstates and EDG are not aware of any such sharing protocols.

















































