

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

IN THE MATTER OF THE )  
ESTABLISHMENT OF A WORKING CASE )  
FOR THE DEVELOPMENT OF BEST ) **Case No. OW-2025-0314**  
PRACTICES FOR WILDFIRE MITIGATION )  
IN MISSOURI )

**RESPONSE TO COMMISSION ORDER**

**COMES NOW** Summit Natural Gas of Missouri, Inc. (“SNGMO” or “Company”), and, as its *Response to Commission’s Order Opening a Working Case to Assist in the Development of Best Practices for Utility Wildfire Mitigation in Missouri and Assessment of Risk*, states as follows to the Missouri Public Service Commission (“Commission”):

On May 14, 2025, the Commission issued its *Order* regarding Missouri’s utility wildfire mitigation development plan and assessment wherein it directed gas corporations to respond to questions set forth in Attachment B to the Order by June 30, 2025. SNGMO has reviewed the questions in Attachment B raised by the Commission and responds to each as follows:

**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.**

A. Summit’s Emergency Response Program (ERP) outlines the steps that should be taken during and after a wildfire event within its service territories. The threat of wildfires is addressed on pages 65-67 of the ERP. The ERP includes sections for wildfire preparedness, personal protective equipment (PPE), response, and procedures. A copy of the wildfire section of the Company’s ERP, dated June 2, 2025, is included with this response as Confidential Attachment A.

**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.**

A. SNGMO participates in annual PAM (Pipeline Association of Missouri) meetings along with emergency responders from many of our operating areas to discuss responses to multiple types of emergencies. These liaison meetings facilitate focused compliance efforts, and each meeting enables pipeline operators and emergency officials to exchange information regarding systems and capabilities, allowing them to plan accordingly in the event of a hazardous incident. The outcome of the meeting is to educate the attendees on the proper response in case of an event, to include, but not limited to, making the area safe for people and property, calling 911 and the gas company, and setting up command sites, etc. These liaison meetings are held to cover proper response in the event of natural gas incidents, including those related to natural disasters.

**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)?**

A. The Company has not provided any information or instructions to customers regarding actions to take with respect to natural gas service that is specific to wildfire evacuations. However, efforts are underway to evaluate wildfire specific information that the Company may share with customers in the future.

**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.**

A. 4.a) & 4 b) While no fire-specific testing has been performed by SNGMO, the Company utilizes well established natural gas materials and equipment that meet or exceed PHMSA and ANSI standards for the industry, and Summit’s Emergency Response Program outlines the steps that would be taken during and after a wildfire event within its service territory.

4.c) In the event of power loss, communication failure, or transfer to local control, field equipment retains its last command state. Gas Controllers contact field personnel to switch to manual control and monitor pipeline operations. If manual control is impossible, field personnel notify the Control Room and shut down the pipeline manually. Field personnel must report completion of all manual operations to the Control Room, including meter readings, pressures, and any abnormal operating conditions (AOC) or emergency operations conditions (EOC). Once communication issues are resolved, remote operations resume, and manual shutdown pipelines can be restarted with verification from Gas Control Management.

All events during manual operations are recorded in the Company's Control Room Management Software.

**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.**

A. See the Company's response to 4.a).

**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.**

A. See the Company's response to 4.a)

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

A. As outlined in the Company's Public Awareness Program section 1.7 Stakeholder Audience, SNGMO partners with local, state, and regional emergency and public officials, affected members of the public, and contract excavators. In addition, the Company has a mutual aid agreement with other utilities as a means to coordinate and obtain emergency assistance when the Company is unable to timely restore natural gas service on its own. Please see Confidential Attachment B for a copy of this agreement.

## **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.**

A. Yes, SNGMO's DIMP addresses Natural Force Damage, which is inclusive of wildfires. Lightning is one of the identified natural forces, which includes both damage and/or fire caused by a direct lightning strike and damage and/or fire as a secondary effect from a lightning strike in the area. An example of such a secondary effect would be a forest fire started by lightning that results in damage to a gas distribution system asset, which results in an incident. Furthermore, SNGMO's DIMP addresses the threat of wildfires through APA's, or additional preventative actions (i.e. ROW Clearing, Pipeline Patrolling). Lastly, risks associated with wildfires are implicitly calculated within Summit's probabilistic risk model.

## **C. Natural Gas and Renewable Natural Gas Transmission Systems**

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

A. The primary function of the Company's Transmission Integrity Management Program (TIMP) is to assess applicable consequence areas and provide data driven insight into integrity related programs and operational activities. Should wildfires be identified as part of the TIMP evaluation, a response would be developed as with other identified risks, as follows: the results of these assessments and data analysis are communicated to the personnel with responsibility for the various programs and operational activities with the potential to affect asset risk and reliability of the transmission pipeline. The results of such assessment and risk data are shared with stakeholders at a cadence defined by the SUI TIMP Charter documents. This communication will solicit organizational feedback targeted

to threats, data collection, and/or programs and activities that may require preventive and mitigative measures based on the analysis of the various datasets and assessment activities managed by the TIMP team.

#### **D. Infrastructure Resilience & Risk Assessment**

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

A. The threat of wildfires and risk assessment is addressed in the Company Emergency Response Plan. SNGMO routinely maintains its above-ground facilities in an effort to eliminate any flammable dead vegetation and prevent excessive growth of potentially flammable vegetation near our facilities.

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

A. Summit Natural Gas of Missouri routinely maintains its above ground facilities in an effort to eliminate any flammable dead vegetation and prevent excessive growth of potentially flammable vegetation near our facilities.

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

A. There are currently no plans to upgrade or harden infrastructure.

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

A. No, due to the unpredictable nature of wildfires, our focus has been on having a process in place to respond to natural disaster events such as wildfires as opposed to identifying higher risk zones.

#### **E. Emergency Response & Safety Protocols**

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

A. The Company maintains and annually reviews critical valve isolation plans designed to shut down

sections of the gas system in emergency situations. In the event of a wildfire, the Company would assess the risk and make decisions to isolate sections of the system if necessary.

**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.**

A. Yes. The critical valve isolation plans contain below-ground inlet valves at district regulator stations. In the event that some isolation valves are not accessible during a wildfire, operations would work with engineering to determine alternative valves to be used.

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

A. Communications are outlined in the Emergency Response Program.

**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?**

A. The Company works with emergency management to ensure that critical infrastructure is protected in the case of a large wildfire – we do not add gas supply to these sites but work with local authorities to ensure safety and security is maintained for safe operations. This includes the shut-off of gas supply where warranted.

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

A. The Company’s isolation plan is designed around an 8-hour relight period for each section of the system to be isolated. If multiple sections or entire distribution systems were to be closed off, it would take an undetermined amount of time to relight. This would be determined on a case-by-case basis by Engineering.

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

A. The Company utilizes well established natural gas materials and equipment that meet or exceed PHMSA and ANSI standards for the industry and follows specific pipe installation practices that includes a standard depth for underground facilities. The use of standard depth mitigates heat risk to underground pipelines.

**F. Pipeline Integrity & Post-Wildfire Damage Assessments**

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

A. Leak surveys would be completed on all assets following any wildfire. This could be done with internal or external crews, depending on the severity of the fire.

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

A. The Company has developed Event Specific Response Guidelines and Preparedness Checklists for natural disasters.

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

A. No, but the Company will act expeditiously to ensure the safety and reliability of the system in the event of any system damage.

**G. Customer Communication & Public Safety**

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

A. In the event we need to notify customers of wildfire-related service disruptions or safety hazards, our team will use a variety of channels to ensure effective communication. These include text messages, emails, automated calls, website banner updates, and collaboration with local law



enforcement and community leaders. When necessary, we also utilize local news outlets and inform them of Summit's plans for wildfire-related service disruptions and potential safety hazards, so they can share accurate and timely information with their readers or viewers. This multi-channel approach helps us deliver timely and organized information to keep everyone informed and safe.

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

A. We are currently developing language to create a dedicated page on our company website. Additionally, we plan to include information about wildfire-related gas safety measures in the Customer Rights and Responsibilities Handbook. We'll also incorporate educational content and "Did You Know" facts into customer-facing materials like safety information shared through e-newsletters, blog posts, and social media.

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

A. The Company does not ask customers to adjust or shut off its gas equipment for safety reasons. Furthermore, customer turn on and off of appliances has the potential to damage the regulator and downstream appliances.

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

A. The Company currently provides a general emergency contact phone number in its Customer Rights and Responsibilities Handbook. The Company intends to include additional information on its website and the Company's Customer Rights and Responsibilities Handbook in the future.

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

A. Yes, the Company's ERP includes the identification of critical customers and the establishment of communications and restoration plans.

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

A. No, however, the Company would follow its curtailment plan in these types of situations. The Company is currently assessing its guidance for wildfire-related gas safety as it pertains to business and industrial users.

**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.**

A. Yes, we participate in a National Mutual Assistance Agreement. A copy of the agreement is included with this response as Confidential Attachment B.

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

A. Coordination with electric utilities occurs via the Unified Command System described in our ERP.

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

A. There are not.

**WHEREFORE**, Summit Natural Gas of Missouri, Inc. respectfully requests that the Commission consider this response to the *Commission Order*, as set forth in this response, and issue such orders as it believes to be reasonable and just.

Respectfully Submitted,

/s/ Goldie Bockstruck

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 30 day of June, 2025, to:

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