

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

ORDER SETTING TIME FOR RESPONSES

Issue Date: October 31, 2025

Effective Date: October 31, 2025

The Commission opened this working case to examine the wildfire mitigation preparedness of Commission-regulated utilities in the state of Missouri; to gather information from utility stakeholders regarding current wildfire mitigation preparedness; and to develop best practices.

Staff at the Commission reviewed the information filed by the utility stakeholders, asked for follow-up information via data requests and informal outreach, and developed a set of best practices for wildfire response and recovery for electrical corporations (Attachment A) and gas corporations (Attachment B). The intent of these plans is not for the utilities to incur significant costs, but to ensure that each Commission-regulated electrical and gas corporation has a base-level plan in place to prepare for, prevent and mitigate damages from, respond to, and recover from wildfire emergencies.

The Commission requests electrical and gas corporations to provide comments on the feasibility of adopting the draft wildfire preparedness, prevention and mitigation, emergency, response and recovery plans in Attachments A and B. Municipally owned electrical suppliers, rural electric cooperatives, operators of municipal natural gas

systems, operators of renewable natural gas systems, and operators of gas transmission and gathering lines are also invited to provide comments.

The public is welcome to submit comments by forwarding electronic communications through the Commission's electronic filing and information system (EFIS) or by mailing written comments. You may submit electronic comments or filings at the Commission's website at <http://www.psc.mo.gov>. (Click on the Access EFIS link on the right side of the page. Scroll down and click on the public comment link for instructions on how to register and submit comments or file a document in the official file. Please refer to File No. OW-2025-0314). Written comments in hard copy should be addressed to the Commission at P.O. Box 360, Jefferson City, Missouri 65102 and should also reference File No. OW-2025-0314. The public can view the contents of the file by following the same link at <http://www.psc.mo.gov>.

THE COMMISSION ORDERS THAT:

1. Electrical corporations shall file any comments on Attachment A no later than December 1, 2025.
2. Gas corporations shall file any comments on Attachment B no later than December 1, 2025.
3. Other stakeholders who wish to file comments on Attachments A or B may do so no later than December 1, 2025.
4. The Commission's Data Center shall provide a copy of this order to all electrical and gas corporations.

5. This order shall be effective when issued.



BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

Dippell, Chief Regulatory Law Judge
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 31st day of October, 2025.

Electric Utility Wildfire Emergency Response and Recovery Plans

Objectives:

1. Identify and mitigate potential wildfire ignition sources from electric utility infrastructure
2. Determine what balance of System Hardening; Technology Integration and Operational Practices is most economically feasible for wildfire prevention, response and recovery
3. Evaluate and analyze the burn potential of vegetation on and near electric utility easements and what impact its ignition during wildfire conditions would have on infrastructure
4. Restore electric service to areas impacted by wildfires safely and efficiently

Essential Elements to Include in Plans:

I. Wildfire Risk Assessment and Emergency Preparation

1. Evaluate whether publicly available fire weather modeling tools, or a combination of publicly available and utility specific modeling will be most useful in analyzing the risk of wildfire.
2. Evaluate the risk specific to the electric utility's service area. At a minimum evaluate the following factors:
 - a. Equipment/Assets (e.g. type, age, inspection/maintenance procedures, etc.)
 - b. Topography
 - c. Weather (include statistically extreme conditions and seasonal conditions)
 - d. Vegetation
 - e. Physical vulnerability (e.g. people, structures, critical facilities/infrastructure)
 - f. Access
3. Determine what sources of information are needed for advance warning of wildfires, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)
4. Become familiar with functional cellular coverage in advance, to gauge whether additional means of public notification during a wildfire event will be required.
5. Establish internal chain of command prior to a wildfire event.
6. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area.
7. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.
8. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).
9. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.

10. Evaluate what actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.
11. Establish and maintain a prioritization matrix for restoration consistent with other applicable tariffs or procedures.
12. Host or participate in annual tabletop training exercises between electric utility staff and responding agencies.
13. Identify personnel needed within the company and externally to implement each action.
 - a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.
 - b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.
 - c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.
14. Evaluate and anticipate what components would most likely be damaged in a wildfire, in order to decide whether the utility's inventory of spare equipment is sufficient.

II. Wildfire Response and Restoration

1. Coordinate with appropriate local public emergency agencies and officials in the immediate aftermath of wildfire.
2. Conduct a damage assessment in wildfire affected areas to determine which facilities will need to be inspected and/or tested prior to re-energizing.
3. Utilize pre-established prioritization matrix to guide restoration activities.
4. Prepare a schedule for testing/replacement of heat affected equipment, components and parts.

Natural Gas Wildfire Emergency Response and Recovery Plans

Objectives:

1. Minimize or eliminate releases of natural gas in areas impacted by wildfires
2. Protect natural gas infrastructure from wildfire damages
3. Analyze and evaluate the safety and integrity of gas infrastructure in areas impacted by wildfires
4. Restore natural gas service to areas impacted by wildfires safely and efficiently

Essential Elements to Include in Plans:

I. Wildfire Emergency Preparation and Response Procedures

1. Define system isolation zones to which the flow of gas can be isolated.
 - a. Identify priority customers (e.g. medically vulnerable or critical infrastructure) within each system isolation zone.
 - b. Determine which valves will need to be operated to isolate each zone, and develop and implement a procedure for inspecting and maintaining the operability and accessibility of these valves.
 - c. Establish manual shut-in sequence for each isolation area (consideration should be given to potential loss of cellular communication and electrical utilities in wildfire affected areas).
2. Determine what sources of information are needed for advance warning of wildfire, and develop and implement a procedure for obtaining and monitoring that information (e.g. through routine monitoring of source data, signing up for alerts, or establishing direct communication.)
3. Establish and maintain adequate means of communications with the appropriate company personnel, local public emergency agencies and local officials and critical infrastructure customers in each service area. Consideration should be given to loss of cellular and electrical services in wildfire affected areas.
4. Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.
5. Determine the levels of wildfire threat that will trigger specific actions (e.g. National Weather Service warnings, official public announcements, direct communication from local officials or emergency responders, evacuation orders).
6. Identify specific actions that your company will take in response to each threat level, and the equipment and resources needed to implement these actions.
7. Evaluate what actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers. If there are actions that should not be taken, this should be communicated to customers as well.
8. Identify personnel needed within the company and externally to implement each action.
 - a. Identify which company personnel or departments will be assigned the responsibility for each action, and provide required equipment and training to these personnel.
 - b. Determine how communications will be maintained with these individuals during a wildfire event. Consideration should be given to potential loss of cellular service in wildfire affected areas.

- c. Establish and maintain mutual assistance agreements with similar utilities for assistance during and following a wildfire event.

II. Wildfire Restoration Procedures

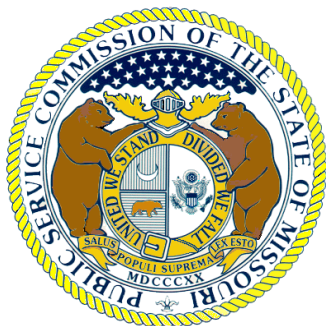
1. Coordinate with appropriate local public emergency agencies and officials prior to intentional purging, venting or flaring natural gas in the immediate aftermath of wildfire.
2. Establish a prioritization matrix for restoration. Consideration should be given to priority customers.
3. Conduct a damage assessment in wildfire affected areas to determine which facilities will need to be inspected and/or tested prior to reintroducing gas, and which will need to be removed and replaced. At a minimum, consideration should be given to:
 - a. Regulator station piping, internal components, supports, insulation, enclosures, monitoring, control, and communication equipment,
 - b. Customer meters, service regulators, relief valves, and anodeless risers,
 - c. Cathodic protection test stations, rectifiers, and electrical panels,
 - d. Sensing, control and communications equipment, gauges, and pressure recording devices, and
 - e. Shallow buried plastic pipelines, anodeless risers, and encased plastic pipelines on bridges or at aboveground terminations.
4. Prepare a schedule for testing/replacement of heat affected equipment, components and parts.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 2nd day of December 2025.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

December 2, 2025

File/Case No. OW-2025-0314

MO PSC Staff

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

**Office of the Public Counsel
(OPC)**

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@psc.mo.gov

**Altenburg-Frohna Municipal
Gas System**

Legal Department
7453 Main St.
Frohna, MO 63732

Ameresco Jefferson City LLC

Legal Department
111 Speen St
Farmington, MA 01701

MO PSC Staff

Carolyn Kerr
200 Madison Street
Jefferson City, MO 65101
carolyn.kerr@psc.mo.gov

Summit Utilities, Inc.

Legal Department
10825 E. Geddes Ave.
Ste. 410
Centennial, CO 80112

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Nancy Dippell
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.