

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

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

## SPIRE MISSOURI COMMENTS

**COMES NOW** Spire Missouri Inc. (“Spire Missouri” or the “Company”), by and through its undersigned counsel, and submits its comments in response to the Missouri Public Service Commission’s (“Commission”) October 31, 2025 Order in the above-captioned docket, stating the following:

1. On May 12, 2025, the Commission opened a working docket to assist in the development of best practices for utility wildfire mitigation in Missouri. The Commission also directed utilities to respond to a series of questions current practices aimed at hardening their systems; technology and communication strategies for predicting, monitoring, and responding to wildfire risks; and a review of current insurance coverage.

2. On June 30, 2025, Spire Missouri provided its responses to the Commission's questions.

3. On October 31, 2025, the Commission filed draft wildfire preparedness, prevention and mitigation, emergency, response and recovery plans developed by Staff of the Commission (“Staff”). Staff developed specific and robust plans for both electric and gas utilities. The Commission noted that the intent of the plans is to ensure that regulated utilities within the state have a base-level plan in place to prepare for, prevent, and mitigate damages from, respond to, and recover from wildfire emergencies. The Commission is now requesting comments on the feasibility of adopting the draft plans.

4. Spire Missouri appreciates the opportunity to comment on the draft plans. The

Company is focused on delivering safe and reliable service to our customers, and natural disasters, like wildfires, can pose a risk to utility service and customer safety. The Company will first provide general comments regarding having wildfire specific emergency plans, before providing its comments on the draft plan for natural gas utilities.

5. The State of Missouri is no stranger to natural disasters and experiences flooding and tornadoes annually that put natural gas facilities at risk. As noted in the Company's June 30, 2025, responses, Spire Missouri has an Emergency Plan Standard Operating Procedure ("SOP") in place that would be followed in the event of a natural disaster, like a wildfire. This SOP contains many of the same items included in the draft plan, including but not limited to identifying isolation zones, monitoring potential natural disasters, assigning tasks within the Company, establishing communications with local agencies, communicating with customers, and coordinating with other utilities. The Company also has similar processes and procedures already in place for restoring service following emergencies. The Company will continue to evaluate throughout this docket the feasibility of adopting additional wildfire-specific items into its emergency procedures, but the Company believes it is important to have a cohesive process for responding to natural gas disasters, which ensures an effective and efficient emergency response.

6. Further, as discussed in the Company's June 30, 2025 responses, according to the Federal Emergency Management Agency ("FEMA") National Risk Index for Wildfire Risk, the Company does not operate in any high-risk areas, and the system is overwhelmingly located in no- to low-risk areas. The Company understands the importance of being able to respond to emergencies and will evaluate how it may add to its existing emergency response plan, but, for the above reasons, does not believe adopting a wildfire specific plan is necessary at this time.

7. In assessing the draft plan itself, the Company believes additional guidance is

required to fully assess the feasibility of adding the specific essential elements for preparation and response procedures into existing emergency procedures. First, defining “wildfires” is necessary, specifically whether it is intended to cover urban fires as well. Spire Missouri primarily operates in the two largest urban areas of the state, and urban areas have very different characteristics than rural areas, especially in Missouri. Also required would be whether the emergency plan would vary depending on the varying level of risk of wildfire across the state. As noted above, Spire Missouri does not operate in high-risk areas, primarily operating in areas of no- to low-risk, according to FEMA. Further, there are references to levels of wildfire threat, however, there is no guidance on how those threat levels are to be determined. This should be consistent across the state, so that utilities, which will likely be coordinating emergency responses, are responding in kind. Clarity on the above items will allow Spire Missouri and other utilities to identify the areas and the facilities that may be considered at risk by the Commission and Staff and allow utilities to focus any additional preparation and mitigation efforts.

8. Finally, one of the essential elements in the preparation and response procedures discusses the “actions the Company would desire customers to take in response to each threat level, and communicate these actions to customers.” While unclear what type of actions are intended to be captured here, the Company never recommends that customers take any action that would involve interacting with the Company’s natural gas system on the utility side of the meter. The Company also does not make any recommendations for customer action or inaction in instances of any natural disaster, tornado, flooding, etc.

9. The Company appreciates the efforts of the Commission and Staff to protect customers, utilities and their employees, and the general public. The Company believes that additional discussions are needed between utility operators, Staff, the Commission, and other

stakeholders to ensure appropriate wildfire preparation, mitigation, and restoration is in place across the state and looks forward to those discussions.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission accept the Company's comments.

Respectfully submitted,

*/s/ J. Antonio Arias*

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J. Antonio Arias, MoBar #74475  
Director, Associate General Counsel - Regulatory  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0655  
antonio.arias@spireenergy.com

**ATTORNEY FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 12th day of December, 2025.

*/s/ J. Antonio Arias*

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J. Antonio Arias