



December 12, 2025

Nancy Dippell, Secretary
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102-0360

Re: *In the Matter of the Establishment of a Working Case for the Development of Best Practices for Wildfire Mitigation in Missouri*
File No. OW-2026-0085

Dear Secretary Dippell:

Summit Natural Gas of Missouri appreciates the opportunity to comment on the proposed wildfire preparedness, prevention, mitigation, emergency response, and recovery plans as outlined in Attachment B of the Commission's Order Setting Time for Responses (File No. OW-2025-0314).

We recognize the imperative to assess the risk posed by wildfires and the necessity for emergency preparedness and response mechanisms. However, we respectfully submit that imposing additional requirements specific to wildfire threats may result in excessive burdens and potential conflicts with already established regulations, particularly those delineated in 20 CSR 4240-40.030.

Summit Natural Gas of Missouri remains committed to public safety and regulatory compliance. We believe the current regulatory framework under 20 CSR 4240-40.030 sufficiently addresses wildfire-related risks without the need for additional, wildfire-specific requirements.

20 CSR 4240-40.030 Section 17 (P) – Gas Distribution Pipeline Integrity Management

This regulation requires operators to systematically assess all potential threats to pipeline integrity, including natural disasters such as wildfires. The process is risk-based, ensuring that the most significant threats—regardless of their nature—are identified and addressed. This approach inherently includes wildfire risks, ensuring they are evaluated and managed alongside other hazards. The DIMP is designed to be adaptable and inclusive of all relevant threats, making additional wildfire-specific mandates unnecessary.

20 CSR 4240-40.030 Section 13 (V) – Valve Maintenance – Distribution Systems

This regulation mandates the establishment and maintenance of emergency valve isolation zones, which are critical for responding to any emergency, including wildfires. These zones are already defined and maintained as part of operators' critical valve plans. Introducing separate requirements for wildfire zones would duplicate existing protocols, adding unnecessary complexity without improving safety outcomes.



20 CSR 4240-40.030 Section 12 (J) – Emergency Plans

The Emergency Plan segment of the natural gas safety regulations details specific requirements for planning and responding to all natural gas emergencies, including those arising from natural disasters. The proposed recommendations would be redundant.

Customer Safety

Summit Natural Gas welcomes a shared approach with its customers in staying vigilant against wildfire metrics and is currently working on a public awareness message to incorporate into our new customer handbook and our website.

Best regards,

/s/ Mitch Pebley

Mitch Pebley

Director of Operations

Summit Natural Gas of Missouri

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 12 day of December, 2025.

/s/ Goldie Bockstruck
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