

**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)

**INITIAL RESPONSE TO COMMISSION ORDER
REGARDING WILDFIRE MITIGATION PLAN ELEMENTS**

COMES NOW, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“Evergy Missouri Metro”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, “Evergy” or the “Company”),¹ and, pursuant to the Missouri Public Service Commission’s (“Commission”) *Order Setting Time for Responses* (“Order”) issued on October 31, 2025, in the above-captioned docket responds as follows.

1. On May 14, 2025, the Commission issued its *Establishment of a Working Case for the Development of Best Practices for Wildfire Mitigation in Missouri*. The Commission directed each Missouri electrical and gas corporation to respond with certain information regarding 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. Evergy filed its responsive comments on June 30, 2025.

2. On October 31, 2025, the Commission issued its Order directing each Missouri electrical and gas corporation to provide comments on the feasibility of adopting draft wildfire preparedness, prevention and mitigation, emergency, response and recovery plans in Attachments

¹ Effective October 7, 2019, Evergy Metro Inc. d/b/a Evergy Missouri Metro adopted the service territory and tariffs of Kansas City Power & Light Company (“KCP&L”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West adopted the service territory and tariffs of KCP&L Greater Missouri Operations Company (“GMO”).

A and B to the Order. The Commission ordered electrical corporations to file comments no later than December 1, 2025, which was later extended to December 12, 2025.

3. Evergy appreciates the opportunity and respectfully submits the following comments in response to the Order.

I. Background and Status of Evergy’s Wildfire Mitigation Planning Efforts

Evergy’s service is supplied by 7,400+ miles of transmission line, 2,500+ miles of sub transmission line, and 34,600+ miles of distribution line. Safely operating our extensive system is an Evergy core value, balanced with the foundational tenets of reliable, affordable, and sustainable service. Operating a utility safely and reliably requires adapting to changing conditions and meeting new challenges. Recent changes to climate norms are driving extreme weather events, while expanding and increasing wildfire risk nationally. Changing weather patterns have also extended the fire season in much of the continental United States, while population trends have more communities and people expanding into previously undeveloped land.

In light of recent national trends of increased wildfire activity and risk across the United States, Evergy assembled a wildfire task force among company leadership in 2024. The goal of this task force was to assess and understand Evergy’s wildfire risk profile, identify steps to design an appropriate wildfire risk mitigation and management strategy, and then implement that strategy. Evergy has since taken steps to advance this approach, including hiring a wildfire risk manager and promoting action at the state and regulatory levels to help facilitate engagement on utility wildfire risk management.

Since assembling our task force, Evergy has taken steps to learn from industry experts and utility peers on how best to manage wildfire risk, including reviewing and evaluating other utility wildfire mitigation plans (“WMP”), attending industry conferences, and tapping into the

knowledge and experience of utility wildfire risk mitigation experts. As part of these efforts, Evergy began work on a WMP in January 2025 with intent on having an initial version drafted by December 31st, 2025. Evergy is working with the Kansas Commission on the same topic and intends to present it to Kansas regulators contemporaneously with the Missouri Commission at some point next year. We anticipate, however, that our WMP will be a living document that can be adapted to take into account evolving risk, operational, and regulatory considerations. Below, we respond to the specific topics the Commission seeks information on, identifying specific actions and considerations the Company has integrated or considered as part of its draft WMP to date.

II. 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.*

RESPONSE: Evergy agrees this item is feasible and appropriate to include in a WMP as monitoring weather forecasts and fuel conditions informs fire danger. For context, Evergy uses publicly available meteorological information from the National Weather Service (“NWS”), United States Geological Survey (“USGS”), National Oceanic and Atmospheric Administration (“NOAA”), National Interagency Fire Center (“NIFC”), and Kansas State University Mesonet to inform its own wildfire risk monitoring. Moreover, we have contracted with a vendor to obtain the Wildland Fire Potential Index and Fire Weather Index for all zip codes across Evergy’s service territory. We also rely on publicly available Normalized Difference Vegetation Index (“NDVI”),² temperature, humidity, and wind modeling. Live and dead fuel moisture values may be useful, but are not currently available for Evergy’s Missouri territory.

² The NDVI is a widely used indicator that measures vegetation health, density, and greenness from satellite or aerial imagery.

2. *Evaluate the risk specific to the electric utility's service area. At a minimum evaluate the following factors:*

RESPONSE: Evergy agrees this is appropriate to include in a WMP. A risk analysis is the foundational first step to identify and quantify wildfire risk on a utility's system. Our wildfire risk analysis is based on a static wildfire risk assessment from an industry-recognized consultant. Notably, our risk assessment uses the industry standard calculation of *Wildfire Risk = Ignition Risk x Fuel Risk*. As noted in our *Initial Response to Commission Order Regarding Questions for Electrical Corporations*, the risk assessment quantifies Evergy's wildfire exposure as 0.36 compared to the national average of 1.0. Below, Evergy explains which elements listed in the Order we have incorporated or plan to incorporate into our draft WMP.

- a. Equipment/Assets (e.g., type, age, inspection/maintenance procedures, etc.)*

RESPONSE: Evergy agrees this information is appropriate for inclusion in a WMP, and we have in fact included equipment/asset data in our wildfire risk assessment. Among other things, our assessment considers historical exposure to fire, vegetation encroachment, and asset condition as it relates to probability of failure. Our assessment also considers the last five years of actual power outages and age of facilities.

- b. Topography*

RESPONSE: Evergy agrees this information is appropriate for inclusion in a WMP, and we have incorporated topology into our own wildfire risk assessment. Specifically, we have incorporated topography into the fuel risk element of our risk assessment calculation, along with other data points from actual wildfire perimeters from wildfires between 2016 and 2024, (such as month of the year, fuel moistures, and atmospheric conditions) to build an environmental profile for each major fire event. We then used this information to define localized high fire risk

conditions, and historical meteorological data to identify the expected months of the year these conditions may exist, along with actual data from those most recent months to establish fuel scores.

c. Weather

RESPONSE: Evergy agrees that weather is an appropriate factor to consider as part of a WMP. Specifically, we have incorporated weather into the risk assessment by recording the conditions during each large fire experienced over the past nine years, regardless of origin. This was then used to understand the conditions most likely to support a large wildfire and the time of year these conditions are most prominent, as noted above.

d. Vegetation

RESPONSE: Evergy agrees that vegetation is an appropriate factor to consider as part of a WMP. Specifically, we have incorporated vegetation into our risk assessment by recording NDVI information about fuels and fuel types during each large fire experienced over the past nine years, regardless of origin. For purposes of our draft WMP, we then used this information to understand the conditions most likely to support a large wildfire and the times of year vegetation is in higher risk conditions. We also measured vegetation within 50 feet each direction of every powerline companywide. The NDVI of vegetation during the most fire-prone months, March/April, was used to generate a fuels risk score for Evergy.

e. Physical Vulnerability (e.g., people, structures, critical facilities/infrastructure)

RESPONSE: Evergy is unclear of the intended meaning of “physical vulnerability,” and how this would or could be incorporated into a WMP or risk assessment. To the extent the Commission means risk of injury and damage to people, structures, and infrastructure, we have not explicitly incorporated this into our risk assessment. Rather, our risk assessment analyzes purely the risk of a fire occurring on the Company’s system. Without further clarification on the

intended meaning, physical vulnerability may be addressed by the various overlays Evergy is using or evaluating for its risk assessment, including Federal Emergency Management Agency (“FEMA”) Risk Assessment, the Kansas Forest Service Data, and 1898 & Co. Asset Management Database and Internal Outage Data. These overlays may provide a more comprehensive view of risk specific to Evergy’s service territory and its assets, and may address the “physical vulnerability” aspect of a risk assessment. For example, FEMA’s Risk Assessment formula includes a “social vulnerability” element, which is a measure of how susceptible a given community is to wildfire in relation to all other communities across the United States. The formula also includes a “community resilience” element, which refers to a community’s ability to prepare and recover from a wildfire, and is also relative to all other communities nationally.

Evergy notes that if it were required to further assess the risk of injury and damage to people, structures, or infrastructure, Evergy would need to engage in further study with the support of a third-party consultant. Although we do not have a cost estimate for such work at this time, this contrasts with the Order’s statement that “[t]he intent of these plans is not for the utilities to incur significant costs.” Order at 1. Accordingly, Evergy does not agree at this time that including this factor in a WMP is reasonable or practicable. Notwithstanding, further Commission clarification of the “physical vulnerability” factor would be beneficial.

f. Access

RESPONSE: Evergy is unclear of the intended meaning of “access.” At the outset, “access” is not an item we have explicitly incorporated into our risk assessment, as our risk assessment purely analyzed the risk of a fire occurring. Without further clarification on the intended meaning of this factor, however, Evergy maintains that “access” could be addressed by the various overlays the Company is using or evaluating for its risk assessment, including FEMA

Risk Assessment, the Kansas Forest Service Data, and 1898 & Co. Asset Management Database and Internal Outage Data. These overlays may provide a more comprehensive view of risk specific to Evergy's service territory and its assets and may address the "access" aspect of a risk assessment.

Additionally, assessing the "access" portion of a risk assessment would likely require Evergy to seek further consultation, likely with the support of a third-party consultant. Although we do not have a cost estimate for such work at this time, this contrasts with the Order's statement that "[t]he intent of these plans is not for the utilities to incur significant costs." Order at 1. Accordingly, Evergy does not agree that including this factor into its WMP is reasonable or appropriate. Notwithstanding, further Commission clarification of the "access" factor would be beneficial.

3. *Determine what sources of information are needed for advance warnings 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.)*

RESPONSE: Evergy has not incorporated sources of specific information needed for advance warnings of wildfires or a procedure for obtaining and monitoring within our draft WMP. Notably, Evergy is unclear what type of "advance warning" the Order contemplates or what type of advance warnings are available. While Evergy personnel plan to conduct further research on this topic, wildfire personnel are, however, registered with WatchDuty. As explained above, WatchDuty is a real-time wildfire tracking and alert platform that enables us to receive wildfire alerts and status updates. Evergy's draft WMP includes operational procedures for Red Flag Warning days, including protocols for monitoring wildfire occurrences and response to a fire near powerlines, as well as engagement with fire response agencies and public safety partners in the

event of a fire. However, further clarification surrounding the advance warnings contemplated in the Order would be beneficial.

4. *Become familiar with functioning cellular coverage in advance, to gauge whether additional means of public notification during a wildfire event will be required.*

RESPONSE: Public notification of a wildfire is typically a local government and emergency manager's duty, thus Evergy does not agree that incorporating this element in a utility WMP is reasonable or appropriate. Evergy has built strong working relationships with state and local government officials and emergency responders regarding emergency operations planning and communications, including local governments and public safety partners. Evergy regularly coordinates and communicates with these groups and is actively developing protocols for coordination with county emergency managers in the event of a wildfire. Evergy's WMP could include additional information on how it communicates internally and with public safety partners during an event should there be a loss of cellular coverage. Notwithstanding, Evergy maintains this is an area that would benefit from further Commission clarification to better understand the Commission's goals and objectives.

5. *Establish internal chain of command prior to a wildfire event.*

RESPONSE: This element is not directly addressed in Evergy's draft WMP, but Evergy agrees this element would be feasible to include in its WMP. Evergy's response to wildfire events will typically align with its response to major storm events, specifically protocols outlined in Evergy's Storm Emergency Response Plan ("SERP"). If utility equipment experiences, or is anticipated to experience, significant damage, the emergency operations center will open and Evergy will enter storm mode, following SERP protocols. Evergy could, for example, integrate the relevant SERP protocols into its WMP to more explicitly address this element should the Commission desire.

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.*

RESPONSE: As noted above, Evergy’s response to wildfire events will generally align with its response to major storm events, specifically protocols outlined in Evergy’s SERP. If utility equipment experiences, or is anticipated to experience, significant damage, the emergency operations center will open and Evergy will enter storm mode, following SERP protocols. Evergy has integrated the relevant SERP protocols into its WMP to address this element.

7. *Understand how the local emergency operations center and utility will be activated and what your utility may be called on to do.*

RESPONSE: This element is not directly addressed in Evergy’s draft WMP, but it would be reasonable to incorporate this element into our WMP. For context, Evergy’s distribution operations centers routinely de-energize lines on behalf of emergency services during incidents like car accidents and structure fires. This practice will be the same for wildfires.

8. *Determine the levels of wildfire threat that will trigger specific actions (e.g., National Weather Service warning, official public announcements, direct communication from local officials or emergency responders, evacuation orders).*

RESPONSE: Evergy is unclear on what “levels of wildfire threat” and “specific actions” the Order is contemplating with this element. For purposes of these comments, Evergy interprets “specific actions” as de-energization events and/or Public Safety Power Shutoff (“PSPS”) events. These actions are partially addressed in Evergy’s draft WMP; therefore, Evergy believes this element would be feasible to incorporate into our WMP. Evergy’s draft WMP provides that NWS Red Flag Warning days are a triggering event for operational protocols. When Red Flag Warnings are issued by the NWS, Evergy’s Transmission System Operations (“TSO”) and Distribution System Operations (“DSO”) implement wildfire operations as described in their relevant operating procedures. These procedures include protocols for monitoring wildfire occurrences, response to

fires near powerline corridors, and post-wildfire restoration. Evergy could assess additional triggering events or wildfire risk levels consistent with current industry practice.

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.*

RESPONSE: Evergy agrees this action is reasonable for inclusion in a WMP. Notably, our draft WMP currently addresses, at least in part, actions the Company typically takes in response to certain threat levels. For context, during NWS Red Flag Warnings, DSO and TSO will proactively review circuits within affected counties and refresh their awareness of remote operational control versus manual control (requiring a truck roll). Evergy is currently evaluating the deployment of more sensitive settings on its breakers/reclosers, though some operational challenges remain – for example, substations that lack remote operational control make it challenging to respond to changing weather conditions in quick fashion. Nevertheless, the Company continues to explore specific response actions that may be appropriate.

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.*

RESPONSE: Evergy is unclear what the Order means by actions the Company would desire customers to take “in response to” wildfire threats. Fire restrictions and evacuations, for example, are typically within the purview of local governments and it is not apparent to Evergy what action an electric customer could take in terms of their energy use that would affect fire risk. To the extent this element is intended to address customer evacuations or similar actions, Evergy finds this to be more aligned with a public preparedness issue that is more appropriately addressed by local governments and/or agencies. Evergy also has concerns with the potential scope of costs to support widespread communications as suggested by the Order. While Evergy does not agree this element is feasible or reasonable to include in a WMP, Evergy remains open to further

exploring ways it can more effectively and more broadly communicate with local governments and stakeholders. For example, Evergy's draft WMP provides information on Evergy's community outreach regarding controlled burns and maintaining a defensible space, which could be expanded to address our emergency communications engagement strategy with local governments and stakeholders. Further clarification on this element would likely be beneficial.

11. Establish and maintain a prioritization matrix for restoration consistent with other applicable tariffs or procedures.

RESPONSE: Currently, Evergy's wildfire service restoration priorities will follow its existing SERP protocols, and Evergy has integrated the SERP restoration protocols into its WMP.

12. Host or participate in annual tabletop training exercises between electric utility staff and responding agencies.

RESPONSE: This element is not directly addressed in Evergy's draft WMP, but Evergy agrees this item is reasonable for inclusion in a WMP. Notably, Evergy attended its first tabletop exercise with county level emergency management in October 2025. While these exercises have not yet been standardized, Evergy is amendable to integrating these training exercises into its WMP on a more routine basis. Evergy would note, however, that coordinating these exercises could require fairly extensive planning and resource commitments given the Company's footprint, accordingly, additional dialogue on this topic would be beneficial.

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.

RESPONSE: Evergy agrees this element is reasonable for inclusion in a WMP. Specifically, Evergy has hired a manager of wildfire mitigation, and continues to explore whether and to what extent additional dedicated wildfire personnel may be needed. Evergy currently plans

to leverage its storm response plan for wildfire response, therefore, we view most of the necessary personnel for this as already being in place. Evergy's WMP references the SERP for incident command structure.

- 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.*

RESPONSE: Communications will be maintained with these individuals during a wildfire event in accordance with the SERP, which is referenced in the WMP.

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

RESPONSE: In the event of a wildfire event, Evergy will leverage its existing storm mutual assistance agreements. In preparing our response, we reviewed our existing mutual aid agreements and believe the agreements are broad enough to cover wildfire situations. In the event of a wildfire event, Evergy plans to leverage its existing storm mutual aid agreements to the extent it can.

- 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.*

RESPONSE: Evergy is unclear what the Order means by "what components would most likely be damaged in a wildfire," and "whether the utility's inventory of spare equipment is sufficient." What specific parts of the utility's system, facilities, and equipment would most likely be damaged would be highly variable depending on the intensity and location of a wildfire, as would Evergy's inventory of spare parts depending on what other repair or replacement work is being done at the time. Accordingly, Evergy believes that additional dialogue and clarification from the Commission on this item would be beneficial.

III. Wildfire Response and Restoration

1. *Coordinate with appropriate local public emergency agencies and officials in the immediate aftermath of a wildfire.*

RESPONSE: Evergy agrees this element is reasonable for inclusion in a WMP. Evergy's

WMP references the SERP for aftermath coordination with local emergency agencies and officials.

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.*

RESPONSE: Evergy agrees this element is reasonable for inclusion in its WMP. Evergy's

WMP references the SERP for damage assessment protocols.

3. *Utilize a pre-established prioritization matrix to guide restoration activities.*

RESPONSE: Evergy agrees this element is reasonable for inclusion in a WMP. Evergy's

WMP references the SERP for restoration priority guidelines.

4. *Prepare a schedule for testing/replacement of heat affected equipment, components, and parts.*

RESPONSE: Evergy agrees it would be reasonable to include this element in its WMP,

however, we anticipate that testing/replacing heat affected equipment would not likely differ from

Evergy's standard recovery and service restoration process.

Respectfully submitted,

/s/ Roger W. Steiner

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed, or mailed, postage prepaid, to the counsel for all parties this 12th Day of December 2025.

/s/ Roger W. Steiner

Attorney for Evergy Missouri Metro and Evergy
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