

**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 Practices for ) File No. OW-2025-0314  
Wildfire Mitigation in Missouri. )

**COMMENTS IN RESPONSE TO THE COMMISSION’S OCTOBER 31, 2025 ORDER  
REGARDING WILDFIRE PREPAREDNESS, PREVENTION, AND MITIGATION  
BEST PRACTICES**

Pursuant to the Commission’s October 31, 2025 *Order Setting Time for Responses*, Grain Belt Express LLC hereby submits its responses to the best practices for wildfire response and recovery for electrical corporations developed by the Commission Staff and attached as **Attachment A** to the October 31, 2025 Order (the “Proposed Plan” or “Plan”).

**I. INTRODUCTION**

1. Grain Belt Express is a public utility as defined by Section 386.020(43) RSMo.<sup>1</sup> Grain Belt Express is an electrical corporation and public utility regulated by the Commission.<sup>2</sup> In the Commission’s *Report and Order on Remand* (the “Original CCN Order”) in File No. EA-2016-0358, Grain Belt Express was granted authority to construct, own, operate, control, manage and maintain HVDC electric transmission facilities (the “Grain Belt Express Project” or the “Project”) within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls Counties, Missouri, as well as an associated converter station in Ralls County, pursuant to Section 393.170.1 RSMo.

2. In the Commission’s October 12, 2023 *Report and Order* (“New CCN Order”) in File No. EA-2023-0017, Grain Belt Express’ Original CCN was modified to (1) relocate the Missouri converter station of the Project from Ralls County to Monroe County and to increase the

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<sup>1</sup> File No. EA-2016-0358, Report and Order on Remand (Mar. 20, 2019).

<sup>2</sup> File No. EA-2016-0358, Report and Order on Remand, pages 37 and 38.

capacity of the Missouri converter station from 500 MW to 2,500 MW in order to deliver 2,500 MW into Missouri, including 1,500 MW into MISO and an additional 1,000 into AECI; (2) relocate the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties; and (3) allow for construction of the Project in two phases.

3. As the Commission is aware, Grain Belt Express is still in the engineering and design phase of the Project, with construction anticipated to begin sometime in 2026. Once constructed, and unlike other public utilities in Missouri that are load serving entities (“LSE”), the Grain Belt Express Project will have no certificated service territory and will have no retail ratepayers. Grain Belt Express appreciates the comprehensiveness of the Proposed Plan and is supportive of the Commission’s intent to standardize, to the extent possible, the wildfire preparedness, mitigation, prevention, and emergency response of public utilities in the State of Missouri.

## **II. COMMENTS ON PROPOSED PLAN**

4. As a transmission utility, Grain Belt Express offers the following comments on the Proposed Plan and notes that the Commission will need to distinguish between LSE’s and transmission owning utilities in implementing certain portions of the Plan. Many aspects of the Plan’s “Essential Elements” may not apply to transmission operators like Grain Belt Express, yet the term “Essential Elements” implies that every electric utility is required to include each element in its wildfire preparedness and prevention plan. Grain Belt Express requests that the Plan be revised to recognize that not every Essential Element is applicable to every electric utility and flexibility is necessary so that each responding utility can tailor its plan to reflect the unique aspects of its own business model and business plan.

5. For example, the Proposed Plan suggests that utilities (i) become familiar with functional cellular coverage in advance to gauge whether additional means of public notification

during a wildfire event will be required (Essential Element I.4); (ii) understand how the local emergency operations center and utility will be activated and what the utility will be called upon to do (Essential Element I.7); (iii) evaluate what actions the Company would desire customers to take in response to each threat level and communicate those actions to customers (Essential Element I.10); and establish and maintain a prioritization matrix for restoration (Essential Element I. 11).

6. As a transmission operator with no retail customers, Grain Belt Express does not believe that its Wildfire Plan, when developed, will require such robust customer notification and outreach procedures. Further, Essential Element I.12, which requires electric utilities to host or participate in annual tabletop training exercises between electric utility staff and responding agencies, may similarly not be applicable to Grain Belt Express. In contrast, a large, vertically-integrated electric utility serving multiple communities over a large geographic service territory in Missouri may however require such procedures.

7. Given the differences between electric public utilities in Missouri in terms of size of service area, types of services provided, and number of retail customers served, Grain Belt Express requests that the Commission reframe what have been termed “Essential Elements” into potential options for each utility to consider and explore as they craft their individual wildfire preparedness and mitigation plans. While Grain Belt Express agrees with the objectives the Commission is pursuing with the wildfire preparedness and mitigation plan, and believes that each utility must assess its own wildfire risk in accordance with Essential Element I.2 and develop a wildfire plan to address those risks, a one-size-fits-all approach in terms of what an individual utility’s plan must contain is not practicable.

8. Further, Grain Belt Express is unclear from a review of the Proposed Plan what specific regulatory timing and reporting obligations are expected from the Commission. For

example, will responding utilities be anticipated to file their Wildfire Plan with the Commission for review and comment by the Commission Staff and subsequent approval by the Commission or will the submission be simply a notice filing. Similarly, it is not clear whether the information gleaned from this proceeding will progress further towards a formal rulemaking in which interested stakeholders participate that ultimately codifies regulations with which all jurisdictional utilities must comply.

9. Grain Belt Express will of course follow all directives from the North American Electric Reliability Corporation (“NERC”) and is familiar with the Wildfire Mitigation Reference Guide distributed by NERC in the summer of 2025, which is subject to ongoing technical conferences and workshop reviews at FERC. Grain Belt Express anticipates that the reliability coordinator and FERC will continue to refine its documents regarding wildfire risk mitigation and that such efforts will inform this proceeding and potentially any subsequent rulemaking.

WHEREFORE, Grain Belt Express respectfully requests that the Commission accept these comments.

Respectfully submitted,

POLSINELLI PC

/s/ Anne E. Callenbach

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**ATTORNEYS FOR RESPONDENT**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 12th day of December, 2025.

/s/ Anne E. Callenbach

Attorney for Respondents