

September 3, 2026

Addendum to complaint EC-2027-0058 and Evergy's Non-response to Data Request

I'm unaware of the progress in this case. I've submitted a Data Request and have not received any response from Evergy.

The only authority who governs over Evergy is the Missouri Public Service Commission. The circuit courts assume the MPSC actively oversees and approves the projects Evergy deems are needed and the courts assume the MPSC oversees Evergy and upholds the limits and requirements of the National Electrical Safety Code, Commission Orders specific to Evergy and CCN 9470.

I desperately need the Missouri Public Service Commission to investigate and clarify if Evergy is seeking excessive line clearances per the NESC. As stated previously, the courts presume, as they should, that the MPSC governs and oversees all aspects of Commission Policy, adherence to Commission orders and ensures the utility is acting properly.

Should Evergy maintain its refusal to provide the measurement clearances of their lines to the nearest roadways, the checks and balances for Evergy rest solely upon the MPSC and if needed, my attorney. Due to Evergy's inaction and nondisclosure of these critically specific measurements I'm unable to form a value of the land they may need based upon the NESC and CCN 9470. See attached Data Request submitted in this case # EC-2026-0350.

Without MPSC issued policy determinations of CCN and NESC restrictions, it is not possible to negotiate the 'publicly needed' land's value.

For example if the NESC states that power lines must be no closer than 18 feet from the ground, and that is achieved through lines and or poles upon the MoDOT utility corridor, why would it be necessary for Evergy to place lines up to 20 feet away horizontally? The NESC standard is achieved without moving the lines outside the MoDOT right of way.

I know the National Electrical Safety Code establishes power line swing clearances at roughly 18 feet. My concern is that Evergy is seeking clearances beyond what the NESC requires.

The benefit to Evergy in placing poles outside the MoDOT right of way is that in placing poles upon their own acquired private easement, should MoDOT widen the road and require Evergy to move their lines the full cost of the pole movement is the responsibility of Missouri taxpayers through MoDOT. Evergy passes all future line movement costs to the state when Evergy has poles outside of the MoDOT right-of-way. Fact.

Per MoDOT, in this case, Evergy lines outside of the MoDOT right of way will likely cost Missouri needless millions in the future. If the lines and poles remain within the MoDOT right of way Evergy and its investors are fully responsible for the line/pole movement ... NOT Missouri taxpayers.

Thank you,

Timothy P Allegri