Basin Electric Power Cooperative
Wildfire Mitigation Plan



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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ANSI	American National Standards Institute
Basin Electric	Basin Electric Power Cooperative
CCP	Crisis Communications Plan
DLR	Dynamic Line Rating
DTN	Data Transmission Network
EAP	Emergency Action Plan
G&T	Generation and Transmission
GIS	Geographic Information System
HFA	Hazardous Fire Area
ERT	Emergency Response Team
KPI	Key Performance Indicator
kV	Kilovolt
LiDAR	Light Detection and Ranging
NATF	North American Transmission Forum
NERC	North American Electric Reliability Corporation
NESC	National Electrical Safety Code
NWS	National Weather Service
OES	Offices of Emergency Services
PSC	Public Service Commission
PSOAR	Protective System Operation Analysis Report
PSPS	Public Safety Power Shutoff
RC	Reliability Coordinator
RFW	Red Flag Warning
ROW	Right-of-Way
TADS	Transmission Availability Data System
TOP	Transmission Operator
TSM	Transmission System Maintenance
TVMP	Transmission Vegetation Management Program
UAS	Uncrewed Aircraft Systems
USFS	U.S. Forest Service
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan
WRC	Wildfire Risk to Communities
WUI	Wildland-Urban Interface

1 INTRODUCTION

Basin Electric Power Cooperative (Basin Electric) recognizes that wildfire poses a threat to public safety and the reliable delivery of electricity across its vast service territory in the Northern Great Plains and Upper Midwest. Although the region has historically experienced fewer catastrophic wildfires than other areas of the country, risk does still exist in our service territory prompting evolving expectations from regulators, insurers, and member-owners to underscore the importance of a proactive approach to wildfire management.

This Wildfire Mitigation Plan (WMP) represents Basin Electric's commitment to reducing the risk of potential utility-related ignitions, protecting cooperative assets from external wildfire damage, and ensuring the safety of employees, members, and the public. The WMP formalizes many of Basin Electric's existing practices while introducing new strategies to address identified opportunities and meet the most rigorous state requirements across Wyoming, Montana, and North Dakota, all of which passed utility WMP-related legislation in 2025.

As a living document, the WMP establishes a framework for prevention, preparedness, response, and continuous improvement. It emphasizes cross-functional accountability, communication with emergency response partners, and transparent engagement with member cooperatives and stakeholders. Through annual progress reporting, ongoing training, and periodic review of this Plan, Basin Electric will adapt its practices to evolving wildfire conditions, emerging industry best practices, and statutory requirements.

1.1 Risk Overview

The vegetation across the majority of Basin Electric's service territory consists of a predominantly vast grassland ecosystem, transitioning from wetter, more lush prairies in the east to drier, shorter grasslands in the west. Pockets of forests exist in areas like higher elevations (foothills), river valleys, and badlands. Additionally, a large portion of the Basin Electric service territory is used for agricultural purposes, either cropland or range / pasture.

Wildfire history in the upper Great Plains has been relatively moderate compared to the West Coast or Rocky Mountain Southwest, but significant fires have occurred. For example, large grassfires have at times swept across western North Dakota and eastern Montana during drought years, and major wildfires such as the 2012 Oil Creek Fire in northeastern Wyoming have burned tens of thousands of acres of grass, shrubland, and timber in the region. As development expands (for oil/gas infrastructure, agriculture, ex-urban housing, etc.), the wildland urban interface (WUI) is also growing in parts of Basin Electric's territory, meaning more people and structures are at risk and could be impacted by any potential powerline-related fire incident. The WMP considers both historical fire data and the potential for more severe fires.

Basin Electric's leadership and staff have become increasingly conscious of wildfire risk in recent years, prompted by events across the industry and inquiries from insurers, lenders, and regulators about Basin Electric's wildfire mitigation efforts. This WMP is a direct outcome of that increased focus. It formalizes many of Basin Electric's existing good practices and introduces new measures to address any gaps, ensuring that Basin Electric's culture evolves to include wildfire safety as a core element.

As a living document, this WMP will be revisited and refined as Basin Electric gains experience and as wildfire risks evolve. Basin Electric's leadership (up to and including the board of directors) is committed to reviewing progress on the WMP at least annually and ensuring cross-functional accountability for implementation. Basin Electric will also remain engaged with peer utilities and industry groups to share lessons learned and adopt best practices. For example, Basin Electric's team members will continue to participate in various best practices industry groups, such as the North American Transmission Forum's Wildfire Mitigation practices group. This collaborative, iterative approach will help keep the WMP effective and current with prevalent and emerging electric utility wildfire mitigation practices.

1.2 Mission, Vision, Values

Basin Electric's mission is *to be a safe, environmentally responsible cooperative that provides reliable, affordable power, products, and services to sustain the quality of life for our member-owners across rural America*. This WMP supports that mission by ensuring that safety, reliability, and environmental stewardship remain at the forefront of Basin Electric's operations.

The WMP is also firmly grounded in Basin Electric's six core values, which guide the cooperative's approach to wildfire risk reduction.

Community: The WMP is designed not only to protect Basin Electric's infrastructure, but also to safeguard the people, homes, and natural resources within its service territory. By engaging stakeholders and supporting member cooperatives in wildfire preparedness, Basin Electric advances its principle of serving neighbors and strengthening the communities it powers.

Integrity: The WMP formalizes transparent, accountable practices in vegetation management, inspections, emergency response, and stakeholder communication. By documenting clear commitments and reporting annually on progress, Basin Electric demonstrates that wildfire mitigation is not an ad hoc activity, but a responsibility carried out with honesty and diligence.

Reliability: Reliable service depends on resilient infrastructure and proactive risk management. The WMP outlines strategies for preventing equipment-related ignitions, hardening facilities against external fire threats, and restoring power safely and quickly after wildfire events.

Teamwork: The cooperative nature of Basin Electric is reflected in the WMP's emphasis on coordination with member distribution cooperatives, transmission operators, first responders, and regulators. Wildfire mitigation is a shared responsibility, and Basin Electric will work collaboratively to keep its system and communities safe.

Safety: Safety is at the center of Basin Electric's culture, and wildfire mitigation enhances that commitment by protecting employees, contractors, and the public from wildfire hazards. Through training, situational awareness programs, and strict operating protocols during high-fire-risk conditions, the WMP makes safety an operational priority.

Adaptability: Basin Electric recognizes that wildfire risk is evolving. The WMP is structured as a living document that will be updated regularly, allowing Basin Electric to incorporate new technologies, lessons learned, and industry best practices to meet both current and future challenges.

By aligning with Basin Electric's mission and values, this WMP advances Basin Electric's long-standing commitment to safety, reliability, environmental responsibility, and community well-being. It ensures that wildfire prevention, protection, and response are embedded in Basin Electric's culture and operations, supporting Basin Electric's vision of providing resilient, sustainable energy delivery service for generations to come.

1.3 Goals and Objectives

The primary purpose of the WMP is to protect public safety, property, and the electric grid from the threat of wildfires potentially ignited by or impacting Basin Electric's electric facilities. The WMP establishes a proactive framework to identify wildfire-related risks and implement preventative and responsive measures, thereby reducing both the likelihood of utility-caused ignition and the potential damage to Basin Electric's infrastructure from external fires. The Plan focuses on minimizing the risk of Basin Electric's transmission and substation equipment serving as potential ignition sources, while reducing the exposure and vulnerability of cooperative facilities to external wildfire threats. Additionally, it strengthens operational preparedness and response by ensuring Basin Electric personnel are equipped to effectively support wildfire emergencies, including providing timely information on electrical infrastructure, de-energizing lines when necessary for firefighter safety, and restoring service as soon as conditions allow. Finally, the Plan establishes a framework for continuous improvement and accountability, enabling ongoing evaluation and enhancement of wildfire mitigation practices. The WMP is designed to satisfy all applicable state regulatory requirements by incorporating every mandated element and adhering to the strictest provisions, supported by annual compliance reports that document progress and demonstrate adherence.

1.4 Main Plan Components

Safety and reliability are core cooperative principles for Basin Electric. Key elements of the Basin Electric WMP are described below.

Table 1: Main plan components.

Mitigation Element	Description	Section
Situational Awareness	Basin Electric partners with its Transmission Operators (TOPs) to monitor fire weather conditions and to take a proactive approach in balancing reliability and fire danger risk for Basin Electric owned assets. The WMP identifies areas with elevated wildfire threat (e.g., portions of forested or grassland terrain in Basin Electric's operating area, WUI zones, and critical facilities) and evaluates system assets at risk. This includes mapping of Hazardous Fire Areas (HFAs) based on wildfire hazard potential data, historical fire occurrence, and the presence of homes or other	4

	structures located in the vicinity of Basin Electric assets.	
Ignition Risk Mitigation Strategies and Programs	The WMP provides a comprehensive vegetation management program, system hardening measures, inspection and maintenance programs, and the analysis of outage data. The WMP highlights Basin Electric's deployment of new technologies to improve wildfire mitigation. The WMP formalizes Basin Electric's emergency response actions for wildfire events. If wildfire threatens or involves Basin Electric facilities, Basin Electric will activate its Incident Response Team, ensuring clear roles and a coordinated approach. Field personnel will interface with transmission operators and local emergency responders.	5
Wildfire Response	Basin Electric's emergency response builds on its existing EAP by adding wildfire-specific roles and strengthening coordination with TOPs, member cooperatives, and operations centers. The WMP further integrates wildfire-focused communication, recovery, and restoration practices, supported by an updated Crisis Communications Plan that will provide clear, consistent messaging to stakeholders and enhance Basin Electric's ability to manage and communicate during wildfire events.	6
Stakeholder Engagement	Basin Electric recognizes the importance of timely, transparent communication with its members, regulators, and the public regarding wildfire mitigation and events. Basin Electric will engage in public outreach as part of WMP implementation.	7
Plan Performance and Monitoring	Basin Electric embeds wildfire risk management into its core safety and reliability framework by aligning WMP implementation with cooperative-wide KPIs, senior leadership oversight, and a cross-departmental Wildfire Committee responsible for strategy, monitoring, and communication.	8

1.5 Five-Year Retrospective Summary of Wildfire Mitigation Activities

Over the past five years, Basin Electric has continued to strengthen and modernize its wildfire mitigation strategies through targeted program enhancements, technology integration, and policy refinement. Since 2019, Basin Electric has implemented a series of improvements designed to increase situational awareness, enhance vegetation

management effectiveness, and reduce the potential for wildfire ignition associated with its transmission assets.

Notable advancements include the introduction of LiDAR-based vegetation and line clearance assessments in 2020, expanded use of Computerized Maintenance Management Systems (CMMS), and comprehensive updates to the Transmission Vegetation Management Program (TVMP) to align with ANSI A300 Part 7 and NERC FAC-003 requirements. These actions, combined with refinements to operational procedures, training programs, and interdepartmental coordination, demonstrate Basin Electric's commitment to continuous improvement and proactive wildfire risk management across its multi-state service territory.

2 COMPANY PROFILE

2.1 The Service Territory

Basin Electric is a member-owned generation and transmission cooperative headquartered in Bismarck, North Dakota, serving a vast region across the Upper Midwest and Northern Great Plains. Founded in 1961, Basin Electric today supplies wholesale electricity to 138-member cooperative systems in nine states (North Dakota, South Dakota, Montana, Wyoming, Minnesota, Colorado, Iowa, Nebraska, and New Mexico). Basin Electric's members, in turn, distribute power to approximately three million members. Basin Electric owns a diverse portfolio of generation resources (including coal, natural gas, wind, and other renewables) and has ownership in a high-voltage transmission system that connects these resources to member systems in seven states. Figure 1 depicts Basin Electric's operating territory and electric transmission system.

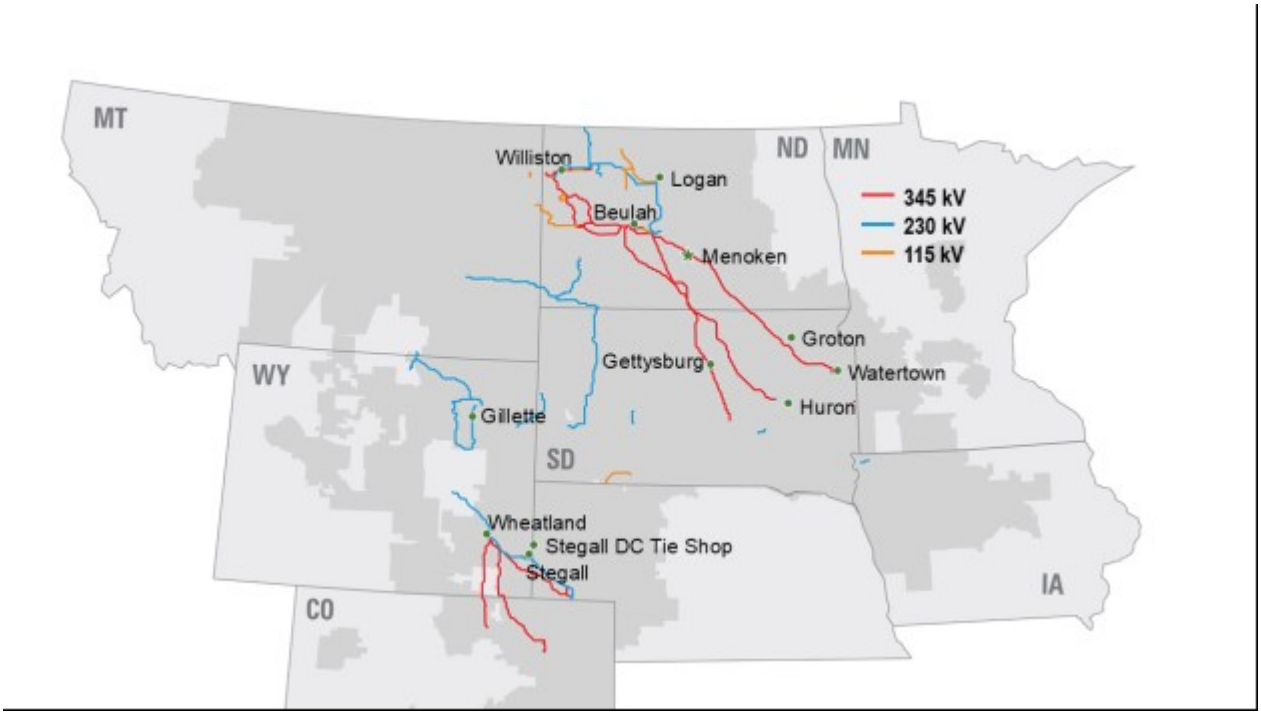


Figure 1: Basin Electric's Transmission System.

2.2 The Electrical System

Basin Electric's transmission system spans portions of Wyoming, Montana, Nebraska, North Dakota, South Dakota, Colorado, and Iowa, operating at voltage levels primarily between 115 and 345 kilovolts (kV). The system includes approximately 2,600 miles of transmission lines and about one hundred substations and switchyards. Basin Electric's transmission is largely a backbone system delivering power from central generation stations to local distribution cooperatives. It does not include lower-voltage distribution lines in neighborhoods or dense forests, which means its wildfire profile differs somewhat from that of a distribution utility. Basin Electric's lines primarily traverse open rangeland, agricultural areas, and some forested regions (e.g., in the Black Hills area of South

Dakota). Basin Electric's asset base includes both steel tower and wood pole structures. In recent years, all new Basin Electric transmission lines have been constructed with steel poles adding increased fire resistance. Existing lines originally built with wood poles are gradually being upgraded with equivalent strength steel replacements, especially when they reach end-of-life or are located in higher-fire-risk zones. **Table 2: Transmission lines in areas of** Table 2 outlines the percentage of Basin Electric's electric assets located in High or Very High fire risk areas as described in section 3.2.2. Wyoming-specific transmission asset data, including total circuit miles and the percentage of existing transmission assets located within High and Very High wildfire risk areas, is provided in Appendix D.

Table 2: Transmission lines in areas of elevated wildfire risk.

Asset Type	Total Circuit-Miles	Circuit-Miles in "High" and "Very High" Hazardous Fire Areas	Percentage of Total Miles
Transmission (all overhead)[1]	3,971	210	5.2%
Distribution	0	0	0%
	3,971	**210**	**5.2%**

[1] Values include future transmission and lines where BEPC is joint owner.

Basin Electric also partners with other utilities on ownership of transmission. For instance, in Colorado the high voltage transmission system that Basin Electric has partial ownership of is maintained and operated by Tri-State Generation and Transmission (G&T). Basin Electric also has partial ownership in a Montana transmission project that traverses parts of Montana, North Dakota, and South Dakota, but Basin Electric does not operate or maintain any section of this transmission. Basin Electric also participates in lease agreements where we lease facilities from others but do not operate or maintain the line section such as the Martin – Shannon 115-kV line in southern South Dakota. Basin Electric coordinates directly with all owners of jointly-owned assets using multiple methods of communication such as operating and management committees and direct correspondence with other owner counterparts.

Basin Electric is not a Transmission Operator (TOP). Basin Electric does not have a system control or operations center. Basin Electric relies on other industry partners to operate the transmission system on our behalf. There are three external TOPs that perform this function on our behalf, Western Area Power Administration – Upper Great Plains (WAPA-UGP), Western Area Power Administration – Rocky Mountain Region (WAPA-RMR), and Black Hills Energy (BHE). Each of these entities operates Basin Electric's portion of the transmission system in the same manner as they operate their own system. Basin Electric Transmission System Maintenance (TSM) staff act as a standalone maintenance group that each TOP calls when issues arise on the transmission system. Basin Electric relies on its experienced and professional TSM team for system-

wide maintenance needs and to work with the applicable TOP to operate the transmission system.

3 RISK ASSESSMENT

Basin Electric's approach to wildfire mitigation begins with a clear understanding of the evolving factors that contribute to ignition risks within its electric service territory. The section describes the risk drivers and mapping that shape Basin Electric's wildfire risk profile and form the foundation for its mitigation strategies.

3.1 Risk Drivers

Wildfire risk within Basin Electric's service territory arises from a combination of environmental, population, and infrastructure-related factors. While the Northern Great Plains and Upper Midwest have historically experienced fewer catastrophic wildfires than the western United States, the interplay of drought, vegetation, wind, human development, and utility infrastructure creates conditions where ignitions and resulting wildfires can occur. Identifying these risk drivers allows Basin Electric to align its mitigation strategies with the unique characteristics of its system and service area and anticipate how evolving conditions may alter future wildfire exposure.

3.1.1 Environmental and Climate

Environmental conditions are primary drivers of wildfire risk across Basin Electric's system. The region is subject to periodic droughts. These conditions dry out grasses and shrubs, making them combustible sources of fuel, particularly in spring before vegetation greens or in late summer and fall when fuels cure. Winds, which are common across the Plains and foothill areas, can accelerate fire spread and carry embers. Historical fire data show that grass fires in drought years in the Dakotas and Eastern Montana have burned tens of thousands of acres and threatened both infrastructure and communities.

Figure 2 depicts the average annual fire weather days from 1973 to 2024 on which the three fire weather conditions met or exceeded their corresponding thresholds in each climate division. On average, there are over 21 annual fire weather days in the 18 climate divisions where Basin Electric assets are located and for which researchers have available data. For all of Basin Electric's active locations, the average days with wildfire weather increased by 2 days per year over the past 50 years.

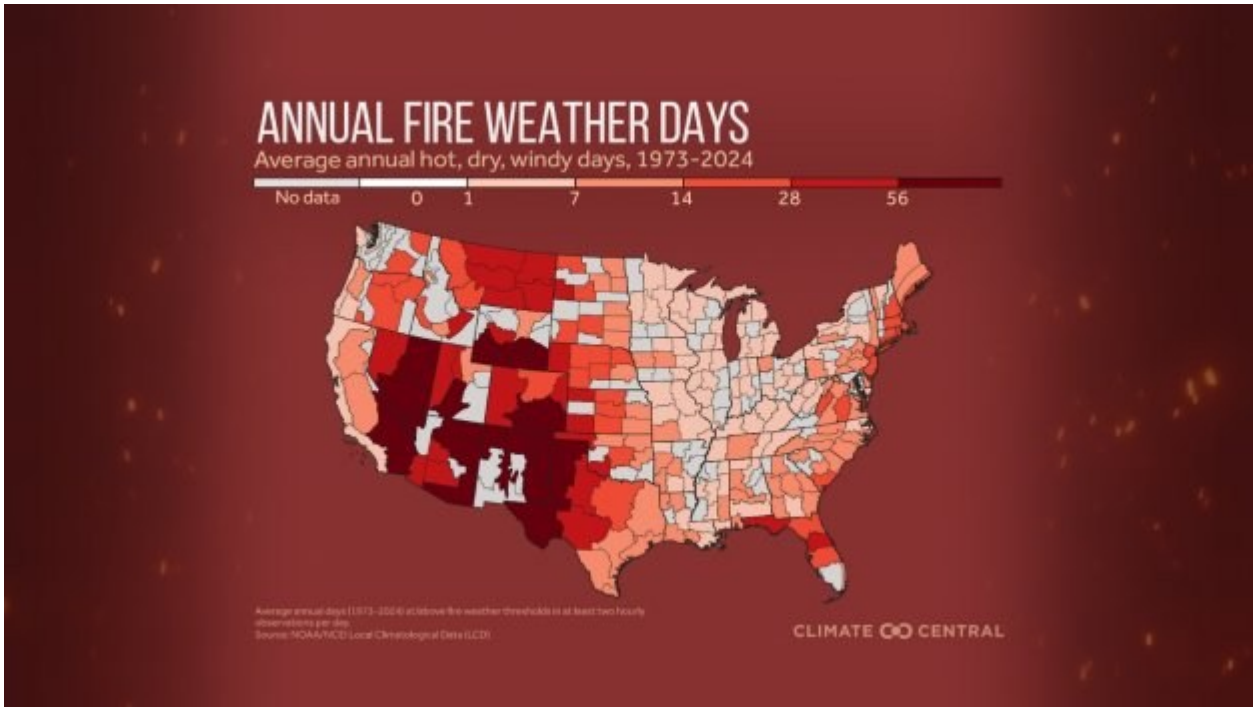


Figure 2. Average annual fire weather days from 1973 to 2024.

3.1.2 Human Population Growth and Development in Wildfire Transmissibility Zones

The steady growth of human activity in areas where infrastructure and natural fuels intersect influences wildfire risk. Expansion of agriculture, oil and gas development, rural housing, and recreational use of public lands has increased the extent of the WUI in Basin Electric's territory. As populations increase, human-caused ignitions increase. Wildfire risk becomes more complex and costly to manage as development progresses, especially in fire-prone landscapes such as the Black Hills of South Dakota.

3.1.3 Infrastructure

Basin Electric's transmission system consists of relatively newer facilities. Basin Electric has and continues to invest in system hardening and modernization; however, aging infrastructure remains a contributing risk driver. Older wood-pole transmission lines, legacy breakers, and outdated arresters are more susceptible to mechanical failure, arcing, and collapse under stress. These attributes could become ignition sources under dry and windy conditions. Weather extremes stress infrastructure and accelerate wear, which heightens the probability of equipment-related failures. Addressing aging assets is both a reliability and a wildfire mitigation imperative.

3.1.4 Enterprise Safety and Wildfire Risk

Wildfire risk is influenced by Basin Electric's enterprise-wide safety culture and operational practices. Utilities can unintentionally contribute to wildfire ignition through field activities such as hot work, vehicle operations in dry vegetation, or insufficient vegetation clearance around lines. Basin Electric has historically emphasized safety in all aspects of its operations. The WMP reinforces that commitment by formalizing fire-safe work practices,

situational awareness protocols, and operational restrictions during periods of heightened fire danger. Employee training, proactive vegetation management, and structured operational response under Red Flag conditions all reduce the likelihood of utility-caused ignitions.

3.2 Wildfire Risk Map

Understanding where wildfire risk exists and how it varies across the landscape is fundamental to effective mitigation planning. A geographic information system (GIS) provides a strong suite of tools for geospatial analysis and can be used to help model wildfire risk and prioritize work. In support of its wildfire prevention and infrastructure protection goals, Basin Electric has developed a GIS-based risk mapping framework that is data-driven and tailored to its unique service territory. This geospatial framework enables Basin Electric to assess fire hazard potential with high resolution and accuracy and identify areas where wildfire could threaten electric infrastructure or nearby communities. It is fundamental to help prioritize mitigation activities.

The Wildfire Risk Map forms the analytical foundation for Basin Electric's broader WMP. It synthesizes fire behavior science, land cover data, and community exposure metrics into a comprehensive, scalable tool that informs everything from vegetation management schedules to infrastructure hardening investments. Central to this framework is the identification and classification of Hazardous Fire Areas (HFAs). Higher-risk HFAs are regions where the potential for wildfire ignition, spread, and impact is elevated. The HFAs delineate and rank areas within Basin Electric's service territory based on their susceptibility to high-intensity wildfire behavior and the potential for significant damage should wildfire originate or burn in the vicinity.

The following section outlines the methodology used to model landscape-level wildfire risk and describes the key characteristics of the HFAs within Basin Electric's service territory. Together, these elements provide a detailed, spatial understanding of where Basin Electric faces wildfire-related challenges, enabling more informed, risk-based operational decisions.

3.2.1 Fuel and Risk Landscape Modeling

To assess and manage wildfire hazards within its electric service territory, Basin Electric has developed a detailed geospatial wildfire risk map in partnership with EDM International, Inc. This model builds on nationally recognized science and datasets curated by the U.S. Forest Service (USFS) through the Wildfire Risk to Communities (WRC) platform. WRC evaluates four risk factors: wildfire likelihood, intensity, exposure, and susceptibility as depicted and defined in Figure 3.



Figure 3: Components of wildfire risk evaluation.

Wildfire Likelihood refers to the statistical probability that a particular location—often represented as a pixel on a landscape—could experience a wildfire in any given year. This measure is derived from extensive fire behavior modeling simulations and is not intended to be predictive of future weather or fire danger conditions. Instead, it reflects historic patterns and variability in key factors such as weather, topography, and ignition sources, based on observed data from recent decades.

Wildfire Intensity describes the amount of energy released during a wildfire event. It is primarily influenced by the characteristics of the landscape, including terrain and the type and availability of vegetative fuels. For example, fires burning through dense forest canopies on sloped terrain typically produce higher intensities than fires in grassy flatlands.

Exposure is the intersection of wildfire likelihood and wildfire intensity with human communities. A community is considered exposed to wildfire if it is in an area with a non-zero chance of fire occurrence. This includes direct exposure from nearby wildland vegetation and indirect exposure from ember travel or home-to-home ignition. For instance, a residence situated in a flammable forested area is inherently exposed to wildfire risk.

Susceptibility refers to the vulnerability of a home or community to damage when exposed to wildfire. In the WRC framework, susceptibility is considered uniformly across residential structures, assuming that any home encountering wildfire is subject to damage. The extent of damage is closely tied to the intensity of the fire.

The HFA modeling approach incorporates an array of high-resolution data, including vegetation cover, topography, historical weather patterns, and large-scale fire behavior simulations. These datasets are provided by authoritative sources such as the USFS, U.S. Geological Survey, and National Weather Service (NWS), and further enriched with demographic and infrastructure data from the U.S. Census Bureau and the Department of Energy.

Five key wildfire risk indicators inform the analysis: Wildfire Hazard Potential (WHP), Burn Probability, Conditional Flame Length, Risk to Potential Structures, and Housing Unit Risk. These indicators collectively describe how likely a fire is to occur, how intensely it might burn, and the consequences if it does.

The wildfire risk analysis and modeling encompass a 10-mile-wide corridor centered on Basin Electric's transmission and distribution lines and a 5-mile radius around Basin Electric's substations and generation sites. The analysis is structured on a fine-scale hexagonal grid with half-acre resolution, allowing for precise localization of fire risk conditions around utility infrastructure.

3.2.2 Description of Hazardous Fire Areas

Basin Electric's HFAs are the output of this advanced risk modeling and represent defined geographic zones where wildfire hazard and potential consequences are highest. These HFAs form the backbone of Basin Electric's wildfire mitigation prioritization framework, guiding decisions across vegetation management, infrastructure inspections, Emergency Action Plan (EAP), and operational planning.

To translate raw data into actionable insights, Basin Electric classifies the landscape into six normalized risk categories: Fire Resistant, Very Low, Low, Moderate, High, and Very High. These adjective risk classes are derived using a weighted natural-breaks methodology to distinguish areas of relatively higher hazard from those of lower concern. The HFAs are characterized by varying levels of fire risk based on fuel continuity, terrain, population/structure density, and proximity to Basin Electric assets. The higher the rating, the greater the potential for fire to spread and cause damage.

Fire Resistant areas include urban cores, large bodies of water, and paved or barren surfaces that are unlikely to ignite or sustain wildfire. Areas rated Very Low or Low typically feature fragmented vegetation and lower fuel loads, offering reduced fire spread potential, though catastrophic fires may still occur under extreme weather conditions. Moderate areas reflect zones where fire could still inflict substantial damage, particularly in places with terrain features or intermediate fuel continuity. High and Very High HFAs, by contrast, are those where fuel density and community exposure overlap most critically, creating conditions that can lead to fast-spreading, destructive, and even catastrophic wildfire behavior. The map is calibrated specifically to Basin Electric's service territory and infrastructure profile, providing a tailored view of where wildfire threats are most likely and potentially damaging.

Additionally, Basin Electric's analysis considers the fire risks presented by agricultural lands in the Northern Plains. Though often overlooked in traditional wildfire planning, corn and soybean fields, especially post-harvest, can serve as highly flammable fuel under dry and windy conditions. These areas, which are prevalent in the Dakotas' rural landscape, can burn rapidly and send embers across long distances. The transient and seasonal nature of this risk requires a nuanced approach that adapts to crop cycles and fire weather conditions.

Finally, the HFAs are visualized on a layered wildfire risk map, showing how transmission and distribution assets intersect with different risk levels. This map is dynamic and is updated routinely to incorporate new data and reflect ongoing changes in land use, infrastructure, and environmental conditions. Basin Electric uses this map to track and

refine its wildfire mitigation actions over time, ensuring alignment with emerging risks and operational realities.

Figure 4 depicts the HFAs relative to Basin Electric's service territory and assets using a 10-mile-wide corridor (five miles on each side of the transmission line centerline) and a five-mile radius around individual assets (e.g., substations). A five-mile buffer around Basin Electric assets provides a wider view of the surrounding areas that could be impacted by fire on the landscape and is consistent with other utility landscape wildfire risk assessments. More detailed maps of the HFAs by state in which Basin Electric operates are provided in Appendix B.

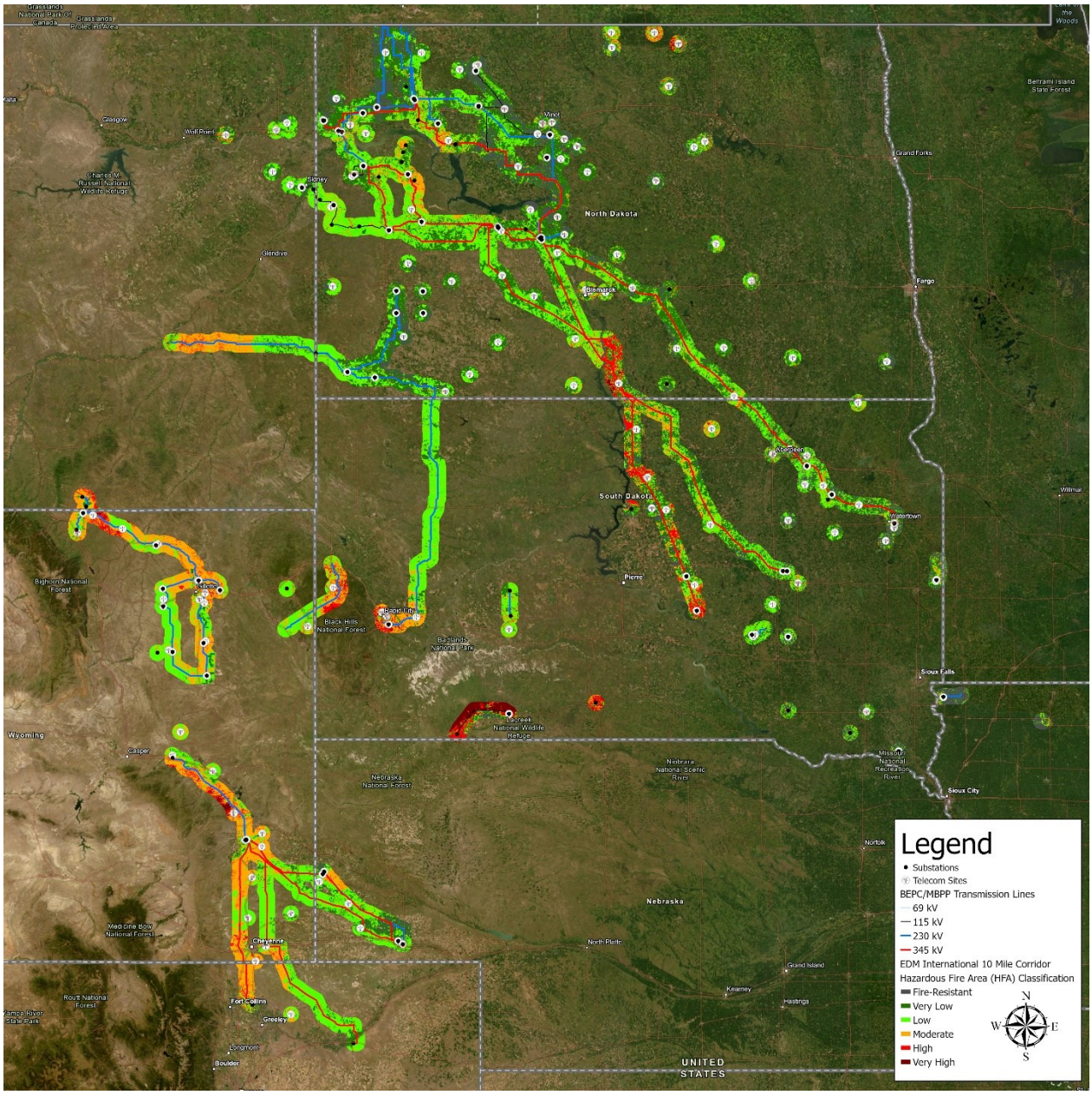


Figure 4: Map depicting HFAs for Basin Electric system.

4 SITUATIONAL AWARENESS

Basin Electric's situational awareness program monitors wildfire risks and enhances operational readiness. This includes real-time and forecasted weather services, advanced remote-sensing technologies, aerial surveys, and monitoring tools to assess asset health and identify vegetation clearances, conductor sag, and other potential wildfire hazards. Key initiatives include annual Light Detection and Ranging (LiDAR) surveys, leveraging satellite data for monitoring active fires, use of dynamic line rating (DLR) sensors, and a growing Unmanned Aircraft System (UAS) program that deploys drones with high-resolution cameras for detailed line inspections.

4.1 Meteorology (Fire Weather Focus)

Weather conditions are a primary driver of wildfire risk, with wind speed, relative humidity, and temperature representing some of the most critical variables influencing both ignition potential and wildfire spread. Effective wildfire risk management requires situational awareness of these factors. To support this objective, Basin Electric subscribes to Data Transmission Network (DTN) weather services and other external resources and tools to actively monitor weather patterns, short- and long-range forecasts, lightning strikes, and real-time or near real-time meteorological data. This situational awareness framework enables proactive operational decision-making and supports the utility's overarching goal of reducing the likelihood and impact of potential utility-related wildfire ignitions.

4.2 Wildfire Detecting and Tracking

Basin Electric's GIS system integrates Esri ArcGIS wildfire layers, which include the following:

- MODIS/VIIRS thermal anomaly data (updated multiple times daily)
- Active wildfire perimeters from sources like NIFC and InciWeb
- Historic fire data and Wildfire Hazard Potential layers

4.3 Remote Sensing

Combined with the identification of the HFAs, remotely sensed data from Basin Electric's system can be applied to support a range of operational and risk-reduction activities. Remote sensing provides a valuable means of identifying asset and vegetation conditions and other potential ignition hazards, thereby enhancing Basin Electric's capability to proactively mitigate wildfire risk.

4.3.1 Fault Detection and Asset Health Sensing

Basin Electric employs a suite of remote sensing technologies to detect faults and monitor asset health:

- Traveling-wave fault locators are installed on seven major transmission lines, accurately identifying fault locations within a few hundred feet on lines up to 200 miles long.
- DLR sensors are deployed on four transmission lines where conductor limits are critical to monitor conductor performance and increase capacity in real time.

- Impedance-based fault location is available on most lines. Impedance-based fault location is less precise than traveling wave but is effective.
- Software retrieves non-operational relay targets every 15 minutes and issues email alerts to Transmission System Maintenance (TSM) supervisors, enabling rapid fault response and early fire detection.
- Dissolved gas analysis sensors are installed on 40 of 126 transformers across Basin Electric's fleet, enhancing internal fault detection between annual oil tests. Dissolved gas analysis sensors are installed on all new transmission transformer purchases.

4.3.2 LiDAR and Aerial Imaging

Basin Electric conducts periodic LiDAR surveys on existing transmission lines and acquires high-resolution (6-inch) aerial imagery for plant sites. For transmission corridors, National Agricultural Imagery Program imagery (60-centimeter resolution) is used. Basin Electric's UAS program, led by the chief pilot, includes drones with both optical and LiDAR sensors. Additional LiDAR data is collected via fixed-wing or helicopter platforms. See section 5.4.2 for further details on Basin Electric's current remote sensing activities related to inspection and maintenance.

5 IGNITION RISK MITIGATION STRATEGIES AND PROGRAMS

This section summarizes Basin Electric's prevention-focused programs and outlines the measures designed to minimize ignition risk across its transmission system and substations. This section also describes how Basin Electric manages field operations under elevated fire danger and integrates ignition prevention into its safety culture. Basin Electric transmission line construction contractors are required to submit a construction work plan that includes all safety procedures. Basin Electric will require applicable contractors to comply with wildfire prevention, and mitigation requirements appropriate to the work being performed. Contractor wildfire prevention measures may include compliance with Basin Electric operational requirements, implementation of contractor-specific wildfire prevention procedures, or other wildfire mitigation measures as determined by Basin Electric.

5.1 Current Practices and Existing Programs

Basin Electric recognizes the importance of maintaining a safe and reliable transmission system. Many of Basin Electric's established practices, though not originally developed under a wildfire-specific framework, already provide meaningful benefits in reducing ignition risk. Over the past decade, Basin Electric has steadily advanced its construction standards, equipment specifications, and maintenance procedures in ways that limit the potential for electrical faults or failures to serve as fire ignition sources.

One example is Basin Electric's proactive approach to mitigating phase to phase conductor faults, a known ignition hazard. Basin Electric has installed air flow spoilers in areas of observed conductor galloping. Similarly, Basin Electric has updated its structure designs for new construction such as increased conductor spacing to further reduce the risk of wire contact under extreme conditions. Basin Electric has also adopted the use of carbon fiber core conductors on select new lines, which exhibit less sag variability under temperature and load changes, thereby lowering the risk of vegetation contact during periods of peak stress.

In addition to conductor and structure improvements, Basin Electric has implemented a range of infrastructure replacement initiatives aimed at addressing aging assets that could contribute to ignition risk. Basin Electric maintains a long-range engineering plan that prioritizes the replacement of aging transmission and substation equipment. This effort has already resulted in significant upgrades over the last decade, with completed projects reducing the probability of equipment-related failures. The Substation Aging Infrastructure Replacement Program delivers wildfire mitigation benefits by phasing out older circuit breakers, surge arresters, and transformers that are more prone to catastrophic failure. New equipment is engineered to modern standards, with improved fault containment and reduced risk of violent failure modes that could spark fires.

5.2 Design and Construction Practices

Basin Electric has been incrementally hardening its system by using stronger materials, incorporating new devices, and researching best practices. Basin Electric's standard design and construction practices already contribute to wildfire mitigation. Key points are described below:

5.2.1 Use of Steel and Non-Combustible Structures: All new transmission lines built by Basin Electric in recent years use steel poles or lattice structures as standard. Steel structures are non-flammable and much more likely to survive wildfire. Even for storm replacements or minor rebuilds, Basin Electric often opts for steel poles, if feasible. This policy significantly reduces the fire vulnerability of Basin Electric's lines over time. In identified High Risk Areas (forested or high-fire zones), Basin Electric will prioritize those lines for earlier conversion to steel during rebuilds. Newly constructed lines are verified with field surveys during construction and inspected post-construction. Basin Electric uses post-construction LiDAR for a second verification on new lines.

5.2.2 Advanced Conductors and Components: Basin Electric has deployed carbon core (composite core) conductors on some new lines. These conductors have less sag variability with temperature. From a wildfire mitigation perspective, they reduce the chance of sagging into vegetation under high conductor temperatures.

5.2.3 Infrastructure Upgrades and Asset Replacement: In addition to the wood-to-steel pole transitions, Basin Electric's Substation Aging Infrastructure Replacement Program carries multiple wildfire mitigation benefits. New circuit breakers, for example, are less likely to fail violently and emit sparks than 40-year-old breakers. Basin Electric also replaces old arresters with new polymer ones and older transformers with modern ones that have better tank rupture prevention and other safety features.

5.2.4 Loading Requirements: As shown in Table 3, Basin Electric uses consistent criteria for structure design and evaluation, ensuring alignment with industry standards such as the National Electrical Safety Code (NESC) and American Society of Civil Engineers. By doing so, the utility strengthens grid reliability, reduces wildfire ignition risk, and enhances system performance under challenging operating conditions.

Table 3: Structure loading requirements.

Structure Loading Requirements							
	Overload Factor						
Load Case	**Vertical**	**Transverse**	**Tension**	**Ice**	**Wind**	**Temp**	**Wire Condition**
NESC Heavy	1.5	2.5	1.65	0.5	4 PSF	0°	Initial
Extreme Wind	1.1	1.1	1.1	0	31 PSF	60°	Initial
Extreme Ice	1.1	1.1	1.1	1.25	0 PSF	0°	Initial
Ice & Wind	1.1	1.1	1.1	0.5	9.2 PSF	15°	Initial
Camber	1.0	1.0	1.0	0.0	2 PSF	40°	Initial
Broken Wire	1.0	1.0	1.0	0.0	4 PSF	60°	Initial
Stringing	1.5	1.5	1.5	0.0	4 PSF	0°	Initial

5.2.5 Line Design Clearances: Line design clearances are essential for ensuring the safe and reliable operation of transmission facilities, particularly in wildfire-prone regions. As shown in Table **4**, Basin Electric clearances are evaluated under all load cases, including normal operation, extreme weather, and emergency conditions, and to account for conductor sag and galloping.

Table 4: Line design clearances (in feet).

Line Design Clearances (ft.)			
Object (Under)	**345kV**	**230kV**	**115kV**
345-kV Conductor	19.0	17.0	
230-kV Conductor	18.0	16.0	
115-kV Conductor	16.0	13.0	9.0
69-kV Conductor	15.0	12.0	8.0
Distribution (<69kV Conductor)	15.0	12.0	8.0
OHGW	15.0	12.0	8.0
Communication Line	15.0	12.0	12.0
Paved Road	30.0	31.0	31.0
Rural Gravel Road	30.0	28.0	26.0
Railroad	38.0	38.0	36.0
Waterways, Lakes, Ponds, Rivers	34.0	34.0	28.0
Ground	30.0	26.0	24.0

5.3 Operational Programs

Basin Electric is establishing a structured approach to fire weather situational awareness and tiered operational response. This ensures that when wildfire weather conditions escalate, Basin Electric's maintenance activities do not inadvertently spark an ignition, and that Basin Electric is prepared to respond if a fire threatens the electrical system and surrounding area.

Basin Electric's approach in this WMP draws on common industry practices such as operational protocols, work mitigation and restriction matrices, and situational monitoring. This section summarizes these mitigations.

5.3.1 Daily Field Operating Practices

Basin Electric utilizes a Work Restriction Matrix to establish wildfire mitigation requirements for field activities conducted during Red Flag Warning (RFW) conditions. The matrix identifies specific work activities and the corresponding precautions, approvals, and fire suppression resources required when elevated fire weather conditions are present. The objective of the matrix is to reduce ignition potential while allowing necessary work to be completed safely when conditions permit.

The Work Restriction Matrix applies a risk-based approach by recognizing that certain field activities present a greater potential for ignition than others. Depending on the work being performed, requirements during RFW conditions may include management approval prior to beginning work, activity-specific operating restrictions, additional fire

prevention measures, and supplemental firefighting and suppression equipment. Certain activities may also be postponed until conditions improve when appropriate.

Examples of requirements contained within the matrix include restrictions on off-road driving, vegetation management activities, use of combustion-powered equipment, hot line work, and cutting, welding, or grinding operations. Depending on the activity being performed, personnel may be required to implement additional fire prevention measures, carry supplemental suppression equipment, modify work practices, maintain adequate clearance from combustible vegetation, and/or obtain management approval before proceeding.

To support implementation of these requirements, Basin Electric maintains crew service territories within its GIS platform and integrates DTN weather data to monitor fire weather conditions. When a Red Flag Warning is issued affecting a service territory, automated notifications are distributed to applicable personnel and management. These notifications provide situational awareness and communicate the work restrictions and mitigation requirements applicable to current conditions.

5.3.2 Powerline Safety Settings

Basin Electric has extensive knowledge and a successful history of clearing transmission system faults using protective relays. Minimizing the fault energy during faults reduces the likelihood of igniting fires. At the transmission level, faults are normally cleared in 3 cycles (0.05 seconds) or less. Most transmission line protection schemes have high speed schemes in place and use communications between them to clear faults quickly. Older schemes that do not have communications, mainly at 115-kV, clear faults quickly, using stepped distance elements which normally clear in 20 cycles (0.3 seconds) or less. Basin Electric achieves these very fast clearing times by specifying high-quality circuit breakers and protective devices that can meet these stringent specifications.

Basin Electric has a strict set of protection and control standards to which all new protection schemes must adhere, ensuring the high standards are continually met. Basin Electric has transmission only and does not have distribution, so Basin Electric attempts and automatically recloses one time before the system drives to lockout. Basin Electric works closely with our TOPs to re-energize after a failed reclose attempt.

Basin Electric works closely with TOPs to ensure the transmission system is operated in a safe, reliable manner. Basin Electric relies on TOPs to monitor conditions where automatic reclosing would need to be manually turned off.

5.3.3 Public Safety Power Shutoff

Purpose and Decision Authority: Proactive de-energization, commonly known as public safety power shutoff or PSPS, is a wildfire mitigation measure that may be used to reduce the risk of utility-caused wildfire ignitions by intentionally de-energizing transmission facilities. Because Basin Electric is not a Transmission Operator (TOP) and does not operate a system control center, PSPS decisions are not based on a predetermined automatic trigger or standalone decision matrix. Rather, Basin Electric coordinates closely with the applicable TOP and works collaboratively to evaluate existing conditions, assess potential impacts, and determine whether de-energization is warranted. Any decision to de-energize facilities is made on a case-by-case basis using available operational, meteorological, and situational awareness information.

Evaluation Factors: Factors considered may include wildfire danger indices, Red Flag Warnings, forecasted and observed weather conditions, active wildfire activity, proximity of fire to transmission facilities, expected impacts to system reliability, availability of alternate transmission paths, impacts to critical infrastructure and public safety, and recommendations from emergency management or firefighting agencies.

While PSPS reduces the risks of wildfire ignition caused by transmission lines, it can also cause significant hardships to members who lose vital electrical power. Even temporary power outages carry risks to communities by disrupting electric service that supports emergency services and may impact public health, including the loss of ventilation and air conditioning during extreme heat. Knowing that the communities Basin Electric serves rely on electric power for essential services, Basin Electric recognizes that balancing the risks of igniting a wildfire with sustaining public well-being makes the use of PSPS a final recourse.

Operational and Reliability Considerations: An active wildfire in proximity to Basin Electric transmission facilities may require heightened operational awareness and coordination but does not by itself indicate that de-energization is warranted.

Historical operating experience throughout Basin Electric's service territory has demonstrated that wildfires occurring near transmission facilities do not necessarily require de-energization. Basin Electric has monitored numerous wildfires, including fast-moving grassland fires that have crossed transmission rights-of-way or burned beneath transmission facilities without impacting the safe operation of the transmission system. While each event is evaluated individually, this experience reinforces the importance of a risk-based assessment that considers actual fire conditions, facility exposure, system reliability impacts, and available mitigation measures before implementing a PSPS.

Basin Electric's TOPs employ highly trained and NERC-certified power system dispatchers in 24/7/365 regional power system Control Centers, actively monitoring and taking appropriate actions to maintain the highest level of electric reliability while coordinating with emergency management agencies, including when confronted with active wildfires.

Basin Electric's TOPs make risk-aware, data-driven decisions for all transmission operations, whether routine or during periods of stress. They use advanced energy management systems (EMS) for remote monitoring and control of the transmission lines and substations that make up the backbone of the national power grid. Armed with GIS and meteorological data, Basin Electric's TOPs maintain operational and situational awareness during elevated wildfire conditions.

In addition to public impacts, Basin Electric and its TOPs evaluate the potential effects that de-energization may have on the reliability and resilience of the remaining transmission system. The removal of transmission facilities from service can alter power flows, reduce system redundancy, increase loading on adjacent facilities, and limit operational flexibility during emergency conditions. De-energization may also reduce available transmission capacity, increase reliance on alternate transmission paths, and reduce the ability of the transmission system to withstand additional contingencies. These potential impacts are considered as part of the overall risk assessment when evaluating whether de-energization is warranted.

Communications and Documentation: Prior to any planned de-energization event, Basin Electric and its TOPs will coordinate with affected utilities and emergency

management agencies to communicate potential public safety impacts. Recognizing that transmission-level de-energization may affect essential community services, Basin Electric will coordinate timely notification and information sharing through affected distribution utilities and other appropriate stakeholders. Public outreach and communications related to de-energization events will be coordinated in accordance with Basin Electric's Crisis Communications Plan and applicable emergency response procedures.

If Basin Electric and its TOPs jointly decide to de-energize equipment, they will work together to ensure all notifications are made to other affected distribution owners, other TOPs, and reliability coordinators (RC). Basin Electric will document PSPS evaluations, recommendations, coordination activities, operational decisions, and stakeholder notifications associated with any PSPS event or formal PSPS consideration. Basin Electric is a generation and transmission cooperative and does not provide electricity to end users. Distribution utilities will notify the public as applicable.

5.3.4 Wildfire Safety Training

To ensure all designated employees and maintenance contractors are aware of wildfire risks and their role in mitigating them, Basin Electric conducts annual fire training.

5.4 Ignition Management

Accurately understanding the causes of outages and near-misses is vital to preventing potential ignitions. Basin Electric has systems in place for capturing and analyzing data from protective device operations, outages, and equipment failures. These data-driven practices enable Basin Electric to identify patterns that might indicate higher ignition risk and to take corrective actions. This subsection details how Basin Electric leverages such data and how it will integrate ignition risk considerations into its analytics.

Protective System Operation Analysis Report (PSOAR): For each applicable transmission line protection system operation, Basin Electric produces a Protection System Operation Analysis Report (PSOAR). These reports document the transmission line protection system operation, identify the root cause (if known), and indicate whether the protection systems operated correctly. Basin Electric maintains PSOAR records dating back to 2016. Each applicable PSOAR also includes a Corrective Action Plan (CAP), which detail the mitigating activities required to correct protection system operation issues.

Outage Cause Coding: Basin Electric patrols all faults and has an Outage Cause Code Procedure and tracks all outage causes in its Incident/Outage Application. Every outage is assigned a cause category. Reviewing this data helps pinpoint if certain lines have recurrent issues. For example, if a line segment shows multiple “conductor galloping” or “equipment failure – hot clamp” incidents, the segment is identified as a candidate for targeted prevention such as adding line dampers. Basin Electric also trends outages in the NERC Transmission Availability Data System (TADS) database, which is an industry-wide requirement.

Equipment Failure Analysis: Basin Electric investigates all equipment failures. Basin Electric uses industry peers, manufacturers, and hired consultants to assist with failure analysis.

5.4.1 Inspection and Maintenance Programs

Basin Electric has a rigorous inspection and maintenance program for its transmission lines and substation equipment, which will continue to leverage and refine with a wildfire prevention lens.

Basin Electric performs routine inspections of transmission lines and substations in accordance with established maintenance procedures and asset management programs. Transmission line inspection activities include vegetation aerial patrols conducted at least annually to support compliance with NERC FAC-003 requirements and up to three times annually depending on operational needs. These patrols also evaluate transmission structures and conductor spans visible from the air. Ground patrol inspections are completed on an approximate two-year cycle and include a comprehensive assessment of transmission structures, conductors, and associated equipment. Substation inspection and maintenance activities generally include electrician inspections conducted on a typical two- to four-month cycle, supervisor inspections conducted on a typical six-month cycle, annual transformer oil testing, and comprehensive preventive maintenance inspections performed on an approximate five-year cycle. Inspection findings are documented, evaluated, and prioritized for corrective action based on asset condition, reliability impacts, and potential ignition risk. Inspection schedules may be adjusted as appropriate based on operational needs, weather, and system conditions.

Basin Electric uses state-of-the-art, handheld field devices to input information into the Computerized Maintenance Management System (CMMS). This system allows field personnel to record defects in the field directly in a digital environment. This data is then automatically synchronized to the CMMS, which generates work orders for repair. Basin Electric uses a ranking system to ensure the highest priority defects are fixed first. Basin Electric will also mobilize immediately to repair any emergency defect that could potentially cause an ignition.

Basin Electric maintains access to its transmission lines and associated facilities for routine inspections, maintenance, emergency response, and restoration activities through established rights-of-way, easements, and coordination with landowners and applicable land management agencies. Existing access roads, trails, and other approved access routes support safe and effective access to facilities throughout Basin Electric's service territory.

This same approach is used for Basin Electric’s entire system including transmission lines, substations, communication sites, mobile equipment/vehicles, and field shops.

5.4.2 Vegetation Management

Proper vegetation management is widely recognized as one of the most critical wildfire mitigation strategies for utilities. Vegetation in contact with or near power lines can ignite from electrical arcing or conductor heat, and tall or falling trees can bring down lines, potentially sparking fires. Basin Electric’s vegetation management line clearance program is handled entirely with internal crews and resources. This ensures a high level of training, quality control, voluntary compliance with American National Standards Institute (ANSI) A-300 Part 7, and familiarity with the system on the part of the crews performing inspections and clearance activities and includes high-frequency inspections, timely clearance work, and enhanced fire safety protocols. Basin Electric contracts herbicide application services to control vegetative fuels, particularly to remove noxious and

invasive weeds. Basin Electric does not have distribution, and the vast majority of its facilities are subject to NERC FAC-003 Vegetation Management standards.

Basin Electric maintains vegetation for approximately 2,600 miles of transmission lines across its service area. The program's objective is to maintain safe clearances between vegetation and conductors and to minimize the amount of flammable vegetation within the ROW that could serve as fuel. Key elements of the program are detailed below.

Routine Inspection Patrols: Basin Electric conducts vegetation inspections both by air and on the ground. Specifically, aerial vegetation patrols are conducted at least annually, allowing visual observation of the ROW conditions quickly over large distances. Ground-based vegetation patrols are conducted on an approximate two-year cycle and are used to assess vegetation conditions and identify locations where vegetation management activities may be necessary.

Remotely Sensed LiDAR Data: Basin Electric initiated a LiDAR program in 2020 to enhance both vegetation clearance monitoring and transmission line design validation. The program was launched with a focus on 345 kV transmission lines, given their criticality, and has since expanded to include older 115 kV and 230 kV lines. Through these inspections, LiDAR data is used to identify vegetation clearance issues, structural encroachments, and ROW conditions that could contribute to wildfire ignition risk or impact system reliability. The data collected provides a detailed, high-resolution baseline that informs ongoing vegetation management efforts, ROW maintenance, and engineering assessments. Identified clearance issues are prioritized for corrective action, with attention given to high-voltage and higher-risk corridors. LiDAR technology also supports Basin Electric's line design review process by validating conductor sag, clearance profiles, and structural integrity, ensuring compliance with clearance requirements and reducing the potential for vegetation contact. While the initial deployment was intended as a single-pass effort, Basin Electric continues to evaluate opportunities to integrate remote sensing technologies into future vegetation management cycles, with the long-term goal of establishing a more systematic approach to wildfire risk reduction and system reliability.

Vegetation Clearing Methods: Basin Electric maintains compliance with ANSI A300 Part 7 standards for integrated vegetation management and pruning practices within its TVMP. Basin Electric's vegetation maintenance philosophy is explicitly aligned with ANSI A300. Basin Electric uses a combination of manual (e.g., chain saws, pruning), mechanical (e.g., mowing, mulching machines), and chemical (herbicide) methods. All substations, telecom sites, shops, laydown yards, and switchyards are treated with a soil sterilant herbicide annually to prevent any vegetative growth inside and approximately 6 feet beyond substation fencing. Coordination with land agencies is conducted when herbicides are applied on public lands. Basin Electric ensures all such activities comply with agency requirements and will communicate with federal land managers to maintain transparency and compliance.

Danger Tree Removal (Off-ROW): Vegetation patrols include inspections beyond the edge of the cleared ROW for any tall, dying or dead trees that could strike Basin Electric facilities. If identified as a potential risk, a tree work order is created in Basin Electric's asset management system and the Land Rights department is engaged to attempt to obtain permission from the property owner to remove or prune the tree to mitigate an outage, avoid potential ignition, and protect Basin Electric facilities.

Utility Collaboration and Best Practices: Basin Electric participates in multiple industry peer groups where collaboration and ideas are shared between utilities about vegetation management.

6 WILDFIRE EVENT RESPONSE

6.1 Emergency Actions Plan (EAP)

Basin Electric's emergency response approach is guided by the EAP, which outlines procedures, responsibilities, and response actions for a variety of emergency scenarios, including wildfire events. The WMP builds upon that foundation by incorporating wildfire-specific mitigation, preparedness, response, and recovery considerations.

During wildfire incidents, Basin Electric closely coordinates with its applicable Transmission Operators (TOPs), member cooperatives, utilities, dispatch centers, and operations personnel to support situational awareness, emergency response, public safety communications, and restoration activities.

6.1.1 Public Information

Wildfire events present unique challenges that require clear, consistent, and proactive communication with both internal and external stakeholders. Recognizing this, Basin Electric has incorporated wildfire-specific protocols into its Crisis Communication Plan (CCP). This inclusion ensures that wildfire events are addressed with the same rigor as other emergency situations while accounting for the unique characteristics and potential impacts associated with wildfire.

The CCP establishes communication processes, notification procedures, stakeholder coordination protocols, and messaging considerations intended to support effective communication before, during, and after wildfire incidents. The plan is integrated with Basin Electric's emergency response organization to help ensure communications remain timely, accurate, and consistent across affected stakeholders.

Distribution cooperatives will generally serve as the primary source of outage and public safety information for retail members within their service territories. Basin Electric supports these efforts by providing technical information, operational updates, restoration status information, and coordination necessary to promote accurate and consistent messaging during wildfire events and other emergencies.

6.2 Restoration

After a wildfire has passed and it is safe to work in the affected area, Basin Electric’s focus shifts to recovering its system and restoring normal operations. An overview of recovery activities is outlined below.

Damage Assessment: Basin Electric crews will patrol affected lines and inspect each impacted substation as soon as conditions allow (often with a drone, fixed wing aircraft, or helicopter if ground access is limited). Basin Electric will catalog all damage including burned poles, fallen structures, melted insulators or conductors, heat-exposed equipment in substations, etc. This assessment is typically completed within 24 to 48 hours for major incidents. In the case of a large event, Basin Electric may split territory into zones with different teams for more efficient assessment.

Prioritize Restoration: Not all facilities can be repaired simultaneously, so Basin Electric will prioritize restoration efforts based on system criticality and operational needs. Transmission lines feeding large substations or key interconnections will receive higher

priority lines with redundancy or minimal impact. Similarly, lines that serve critical loads, such as pumping stations or hospitals (via cooperatives), would be ranked higher. This prioritization approach aligns with required plan elements that call for considering impacts on the broader system and public safety during de-energization and restoration.

Repair Crews and Materials: Basin Electric maintains a stockpile of critical restoration materials–such as poles, crossarms, and transformers—warehoused at multiple locations throughout its service area. Basin Electric crews will start repairs; however, if damage is extensive, contractors will be deployed. Basin Electric has mutual assistance agreements, allowing crews from other utilities to assist during large-scale restoration.

Restoration Work Practices: Safety remains paramount in restoration. Crews treat all downed lines as energized until they are confirmed to be de-energized and grounded. In wildfire-affected areas, additional hazards such as ash pits or falling trees may be present. Accordingly, crews proceed with caution and, when possible, wait for confirmation from fire suppression personnel that the fire is extinguished and the area is safe to access.

Public and Member Updates: Throughout the restoration process the Crisis Communication Team will provide regular updates—communicated through its member cooperatives—on the status of restoration activities, areas still without power, and estimated times of restoration. Transparent communication helps manage expectations and maintain trust.

Post-Fire System Checks: After restoration, Basin Electric will analyze whether equipment exposed to heat but not obviously damaged may need to be replaced (for example, if heat compromised facility integrity). Basin Electric may perform infrared scans on insulators that were near fires or test line strength. If a fire burned the ground under lines, Basin Electric may inspect footing or guy anchor integrity as well.

Cost and Claims Management: Basin Electric will track costs of firefighting support and repairs with trackable work orders. Basin Electric will cooperate with any investigations by fire authorities to determine the cause.

Learnings and Plan Updates: After the incident, Basin Electric will conduct an internal After-Action Review to compile lessons learned. These lessons will be used to update this WMP and internal procedures.

7 STAKEHOLDER ENGAGEMENT

Basin Electric recognizes that supporting its member cooperatives, the end-use members, and other stakeholders (such as regulators, communities, and employees) is a critical part of wildfire mitigation and response. Wildfires can cause anxiety and disruption for the public; a transparent, member-focused approach helps maintain trust and ensures that safety messages are heard. By engaging stakeholder support, Basin Electric ensures that wildfire mitigation is not just an internal technical exercise, but a community-oriented one. It leverages the cooperative principles of Education, Training, and Information (one of the seven cooperative principles) to educate its members and the public about wildfire safety and Basin Electric's role. It also embodies Concern for Community, showing that Basin Electric's goals extend beyond power delivery to the well-being of the communities it serves.

This section outlines how Basin Electric addresses member and stakeholder needs in the context of wildfire mitigation. It encompasses outreach and education efforts, engagement with the public on wildfire safety, and assistance provided during and after wildfire events.

7.1 Stakeholders

7.1.1 State Government and Emergency Agencies

Basin Electric will maintain proactive engagement with state governments across its service territory to ensure alignment on wildfire preparedness, response, and recovery. This includes communicating periodically with emergency managers and planning officials to share information about Basin Electric's wildfire mitigation strategies, de-energization protocols, and restoration priorities. Upon request, Basin Electric will also participate in county-level emergency planning meetings and full-scale disaster exercises, ensuring that energy infrastructure considerations are incorporated into community response plans. Further, Basin Electric will actively engage first responders, local fire agencies, and county Offices of Emergency Services (OES) on Basin Electric's WMP, and participate with state or local wildfire protection or mitigation plans as required to meet individual state legislation.

Basin Electric maintains communication pathways and current contact information for county emergency management agencies, emergency response organizations, member cooperatives, transmission operators, state emergency management agencies, state forestry and wildland fire agencies, federal land management agencies, and other utility stakeholders serving areas where Basin Electric owns, operates, or maintains transmission facilities. These relationships support emergency coordination, wildfire response, situational awareness, de-energization decision-making, public safety communications, and restoration activities. Contact information, communication protocols, and notification procedures are maintained and periodically updated through Basin Electric's Crisis Communications Plan, Emergency Action Plans, and associated emergency response procedures.

7.1.2 PUC or Board Members

Basin Electric will keep regulators and its board members apprised of its wildfire mitigation progress. Basin Electric will file the following:

- **Annual WMP Progress Reports:** State legislation requires yearly reports on WMP compliance. Basin Electric will compile these, highlighting work, as well as any incidents and how they were handled. These reports can be published, which further informs stakeholders.
- **Plan Updates and Public Versions:** Basin Electric will periodically review and update this WMP to incorporate new technologies, results from risk modeling, lessons learned, regulatory requirements, and stakeholder feedback. Formal submissions to regulatory agencies will be made in accordance with applicable state requirements.
- **Continuous Communication with Board and Members:** Internally, Basin Electric's Board of Directors (comprised of representatives from member cooperatives) will receive regular updates on WMP implementation.

7.1.3 Coordination Regarding Shared Facilities

Basin Electric owns interests in certain jointly owned and leased transmission facilities across its service territory. For facilities that are jointly owned, leased, or otherwise shared with other electric utilities, Basin Electric coordinates with co-owners, operators, and Transmission Operators (TOPs) through routine operational communications, operating and management committees, maintenance planning activities, and direct correspondence.

Coordination activities may include the exchange of information related to wildfire risk assessments, inspection and maintenance activities, vegetation management, operational restrictions during elevated fire weather conditions, emergency response actions, and system restoration activities. Basin Electric will continue to work collaboratively with other utilities and facility operators to support consistent wildfire mitigation practices and effective communication regarding shared facilities.

7.2 Members

Basin Electric, in coordination with its member distribution cooperatives, will engage in proactive outreach to raise awareness about wildfire prevention and how Basin Electric is working to keep communities safe. Basin Electric will utilize existing communication tools to inform member cooperatives, local stakeholders, and the public about wildfire preparedness and mitigation initiatives. Outreach will be coordinated with cooperative communications to ensure consistent messaging across newsletters, social media, and public updates. This effort will enhance situational awareness and reinforce Basin Electric's commitment to safety, reliability, and environmental stewardship. Key initiatives include the following:

Website and Educational Materials: Basin Electric will maintain a section on its public website dedicated to wildfire mitigation. Here, the WMP will be published for transparency.

Collaboration with Member Cooperatives for Public Messaging: Member cooperatives are the ones directly interacting with members. Basin Electric will support them by providing content and expertise for their newsletters, social media, and annual meetings about wildfire mitigation. Resources will be further outlined in the Communications Strategy

Engagement with Agriculture and Landowners: Basin Electric lines cross private ranchlands and farms. Basin Electric field and ROW personnel strive to maintain favorable landowner relations. These normally occur with face-to-face conversations and other forms of communication that are administered periodically.

8 PLAN PERFORMANCE AND MONITORING

Basin Electric recognizes that the effectiveness of its WMP is not determined solely by its content, but by the discipline with which it is implemented, evaluated, and continuously improved.

The foundation of this framework is the integration of wildfire ignition risk into Basin Electric's broader safety, reliability, and operational performance metrics. By aligning wildfire mitigation activities with key performance indicators (KPIs) and cooperative-wide safety initiatives, Basin Electric ensures that wildfire risk management remains a strategic priority at the highest levels of leadership. Oversight is anchored by a dedicated Wildfire Committee with cross-departmental representation charged with monitoring implementation, evaluating outcomes, and coordinating communication across internal and external stakeholders.

8.1 Accountability and Metrics

Establishing metrics and reporting mechanisms that integrate wildfire mitigation data and contributing program performance into the broader safety and reliability metrics reviewed by senior leadership improve visibility and accountability for data-driven decision-making and ensure that wildfire risk reduction efforts remain a key focus area within corporate safety initiatives.

Basin Electric will monitor and evaluate the effectiveness of its wildfire mitigation activities through a combination of safety, reliability, vegetation management, inspection, response, and compliance performance metrics. These metrics are intended to support continuous improvement, identify emerging trends, and help prioritize future mitigation activities.

Metrics monitored by Basin Electric may include:

- Completion of scheduled transmission line and substation inspections.
- Completion of vegetation management activities, including ROW maintenance, danger tree mitigation, herbicide treatments, and LiDAR vegetation reviews.
- Number and severity of identified deficiencies, defects, and corrective actions generated through inspection and maintenance programs.
- Wildfire-related outage trends, outage causes, and recurring equipment issues identified through outage cause coding, PSOAR reviews, and NERC TADS reporting.
- Wildfire ignition events, near-miss events, equipment failures, and associated corrective actions.
- Red Flag Warning activity, wildfire occurrence, and wildfire proximity to Basin Electric assets.
- Implementation of system hardening projects, infrastructure replacement activities, and other wildfire risk reduction measures.
- Completion of employee and contractor wildfire training and preparedness activities.
- Compliance with WMP commitments, implementation schedules, reporting requirements, and internal audit findings.

Program performance metrics and trends will be reviewed periodically by the Wildfire Committee and executive leadership to evaluate program effectiveness, identify opportunities for improvement, and support updates to future WMPs.

8.1.1 Plan Responsibility

Implementation and oversight of the WMP is led by the Basin Electric CEO, who retains ultimate accountability for the WMP's execution and compliance performance. The CEO delegates operational responsibilities to a designated Wildfire Committee, which functions as the central coordinating body for all wildfire mitigation activities.

The Wildfire Committee includes representatives from the following:

- CEO
- Transmission
- Transmission Systems Maintenance
- Engineering & Construction
- Safety
- Security and Compliance
- Environmental Services
- Government Relations
- Risk & Insurance
- Legal
- Member and External Relations

The Committee meets at least quarterly, with additional meetings scheduled as needed. Responsibilities of the Committee include the following:

- Setting the strategy for wildfire risk situational awareness and monitoring the progress of implementation
- Monitoring the status of mitigation activities relative to the approved implementation plan
- Evaluating metric performance and identifying corrective actions or resource reallocations
- Setting the strategy for internal and external communications related to wildfire risk and mitigation
- Reviewing recorded ignitions, ignition trends, and mitigation activities

Wildfire Committee meeting minutes are retained.

8.1.2 Program Audit

Basin Electric will perform an annual audit of its wildfire mitigation activities. The objective of the audit is to evaluate the degree to which the WMP implementation aligns with approved strategies, timelines, and risk-reduction objectives.

8.2 Continuous Improvement

As a cooperative, Basin Electric benefits from the collective knowledge of the utility industry and actively participates in forums, research, and innovation efforts that inform wildfire mitigation strategies.

Through its membership in the NATF Vegetation Management practice group and participation in regional utility exchanges, Basin Electric stays current on best practices and monitors wildfire mitigation innovations and prevalent industry best practices. Basin Electric

Basin Electric is also exploring expanded use of weather analytics, remote sensing, and advanced LiDAR modeling to improve fire risk forecasting and vegetation clearance management. While many of these efforts are in the initial stages, this WMP encourages Basin Electric to pursue pilot projects, partnerships with universities or agencies, and resource planning strategies that support long-term resilience, including the potential for microgrids or sectionalizing approaches with member co-ops.

Internally, Basin Electric is embedding wildfire awareness into its safety culture, staff training, and project planning—incorporating wildfire risk into line design decisions and developing a dedicated Fire Prevention and Response Procedure to complement its Emergency Operating Plan. In this way, Basin Electric's hardening and research and development efforts are designed not as one-time initiatives but as a continuous cycle of improvement, ensuring that its wildfire mitigation practices evolve alongside industry knowledge and emerging threats.

9 APPENDICES / EXHIBITS

9.1 Appendix A: Definitions

After Action Review: A structured evaluation conducted after a wildfire event to capture lessons learned, identify improvements, and update mitigation strategies for future events.

Asset Management: Practices for tracking, maintaining, and upgrading equipment to reduce wildfire ignition risk and improve reliability.

De-energization: Proactively shutting off power to lines during extreme wildfire conditions to prevent ignitions (including PSPS).

Defensible Space: A buffer zone around substations and other critical facilities where vegetation and combustible materials are removed or reduced to slow the spread of wildfire and protect infrastructure.

Dynamic Line Rating: A technology that monitors conductor performance in real time, allowing operators to adjust transmission capacity and detect conditions that could increase fire risk (such as excessive conductor sag).

Emergency Action Plan (EAP): A utility's structured plan for responding to emergencies, including wildfires.

Hazardous Fire Area (HFA): A geographic zone where the potential for wildfire ignition, spread, and impact is highest, based on vegetation, topography, fuel loads, and proximity to utility assets. HFAs are used to prioritize inspection, vegetation management, and operational controls.

Ignition Risk: The probability that utility equipment, vegetation, or human activity could initiate a wildfire under prevailing conditions. Basin Electric manages ignition risk through inspections, vegetation management, equipment upgrades, and operational protocols.

Ignition Risk Mitigation: Programs and measures that reduce the likelihood of utility equipment starting wildfires.

Light Detection and Ranging: A remote sensing technology used to map vegetation clearances and utility infrastructure in high detail.

Mutual Aid: Agreements where neighboring utilities provide crews and equipment during large-scale emergencies, including wildfires.

Outage Cause Coding: A structured process of categorizing outage events (e.g., vegetation, lightning, equipment failure) to identify ignition risks.

Protective Relay: A device that detects electrical faults and triggers circuit breakers to prevent fires or equipment damage.

Public Safety Power Shutoff (PSPS): A last-resort operational measure where electric lines are intentionally de-energized during extreme fire danger to reduce the risk of ignition. PSPS events are rare in Basin Electric's service territory but remain part of the wildfire safety tool kit.

Recloser: A protective device that automatically restores power after a fault; in wildfire contexts, settings may be adjusted to minimize ignition risk.

Red Flag Warning (RFW): An alert issued by the NWS when a combination of strong winds, low humidity, and warm temperatures can create extreme fire danger. Basin Electric uses RFWs to activate enhanced fire safety protocols.

Remote Sensing: Use of aerial, satellite, or drone-based technologies to monitor vegetation, asset conditions, and fire hazards.

Right-of-Way (ROW): The cleared corridor around transmission lines maintained by Basin Electric through vegetation management and inspection. ROW maintenance reduces fuel for potential fires and ensures compliance with safety codes.

Situational Awareness: The continuous monitoring of weather, fire conditions, and system status to guide Basin Electric's operational decisions. This includes the use of meteorological data, GIS fire mapping, remote sensing, and satellite detection tools.

System Hardening: Infrastructure upgrades (steel poles, advanced conductors, modern breakers) to make the grid more resilient to wildfires.

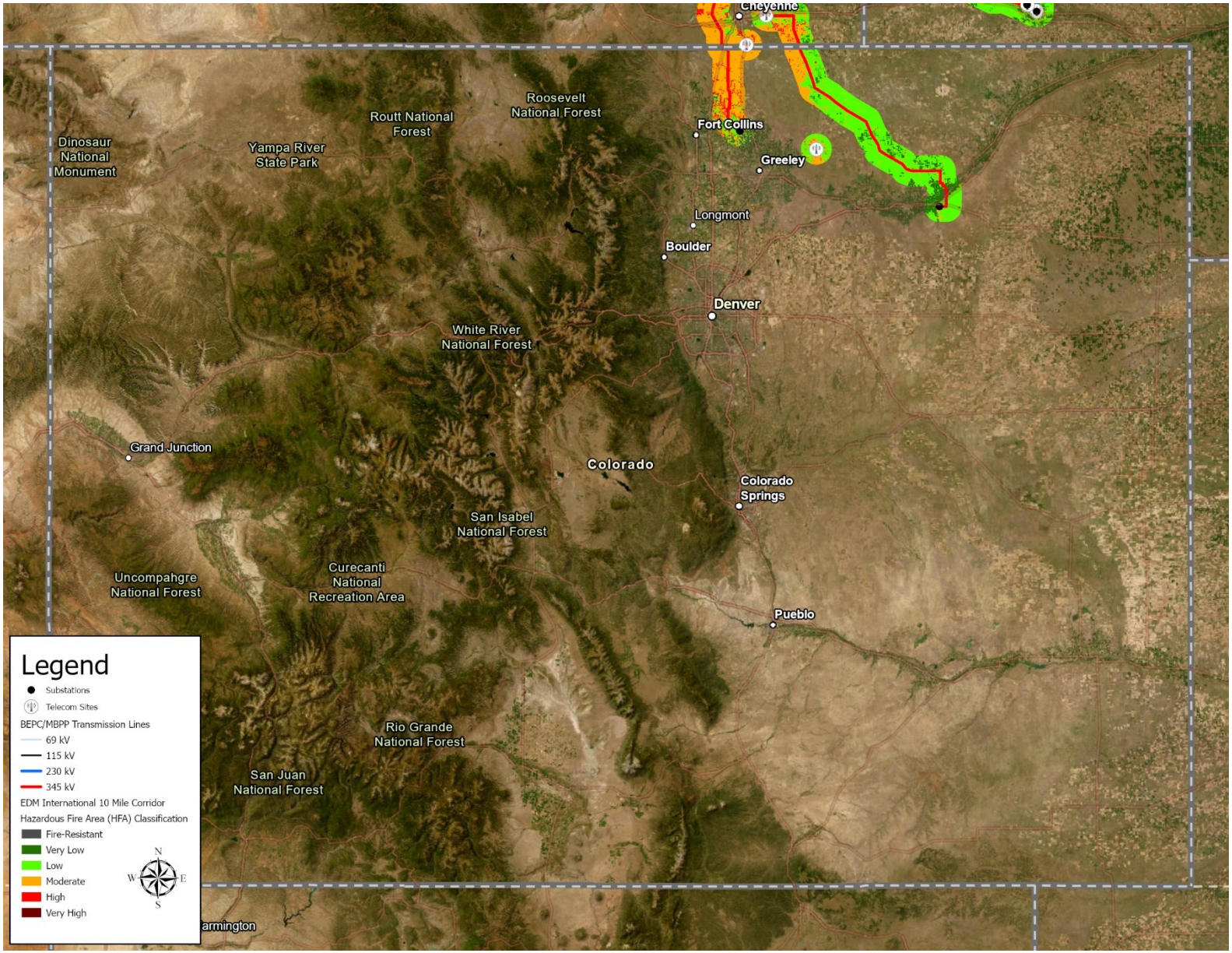
Transmission System Maintenance: Division responsible for inspection, maintenance, and field operations of transmission lines and substations.

Vegetation Management: Systematic clearance and control of vegetation around powerlines and substations to prevent wildfire ignition and maintain safe clearances.

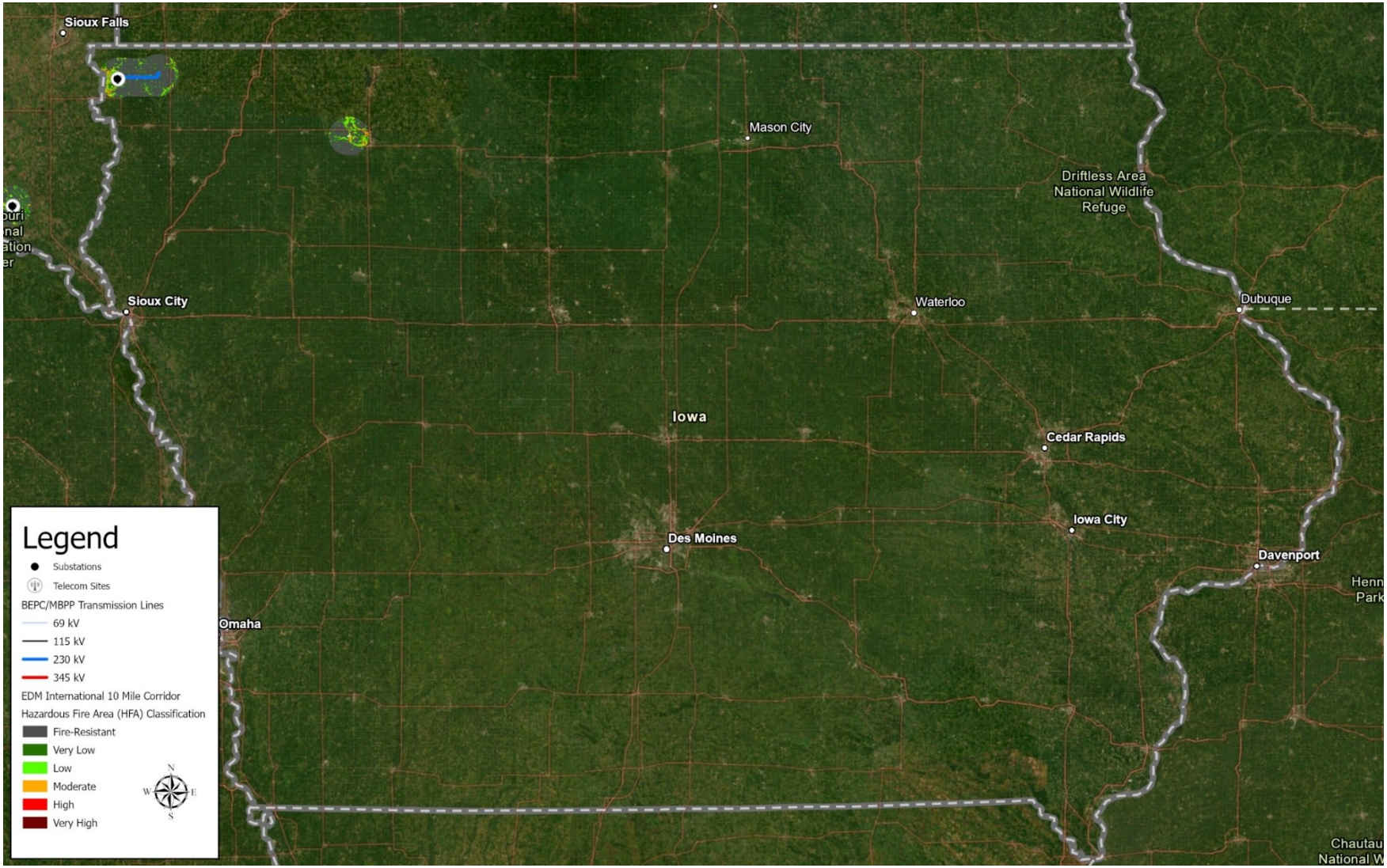
Wildland-Urban Interface: The area where human development (homes, businesses, and infrastructure) meets or intermingles with flammable wildland vegetation, creating elevated wildfire risk to people and structures.

9.2 Appendix B: Hazardous Fire Area Maps by State

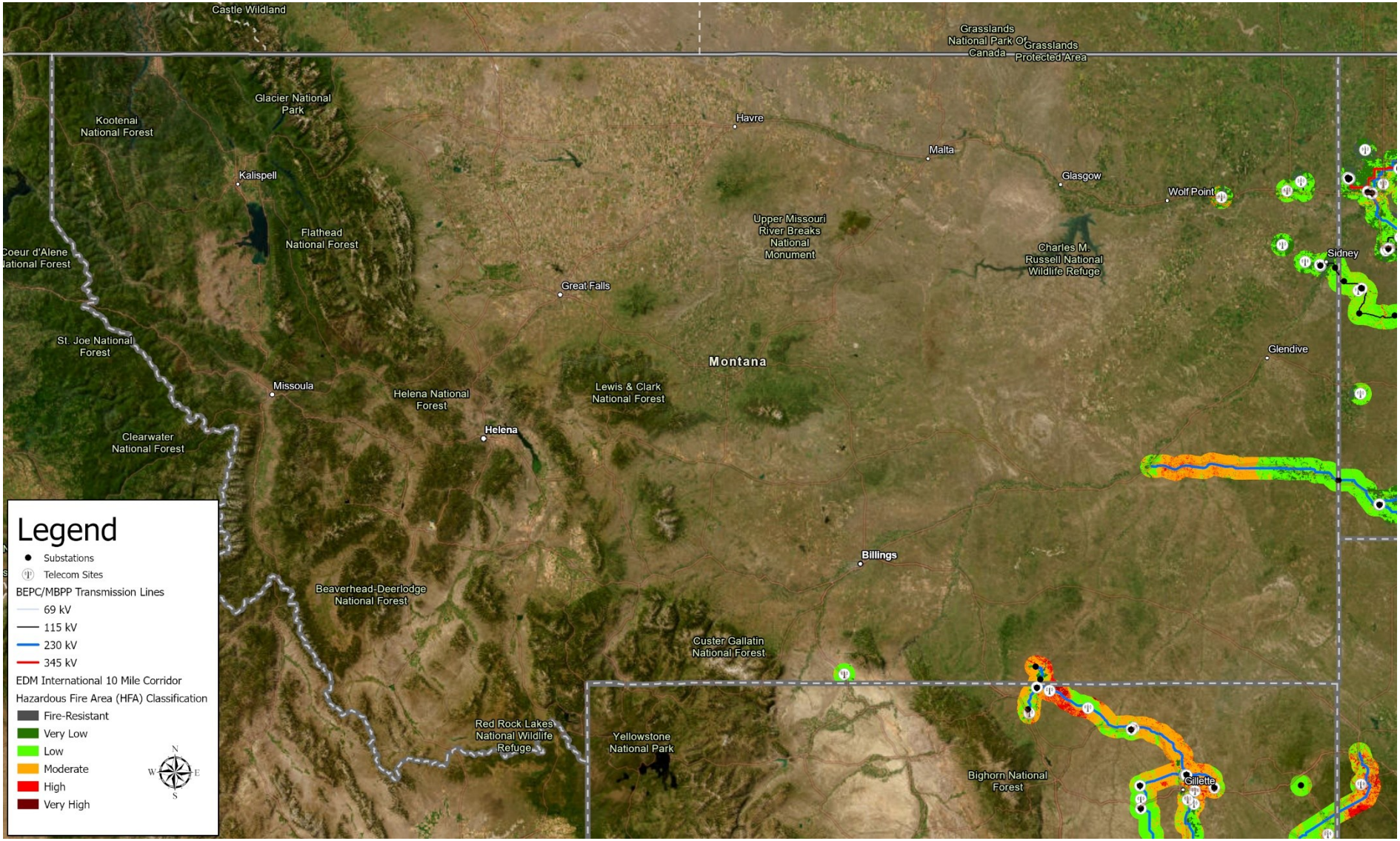
Colorado



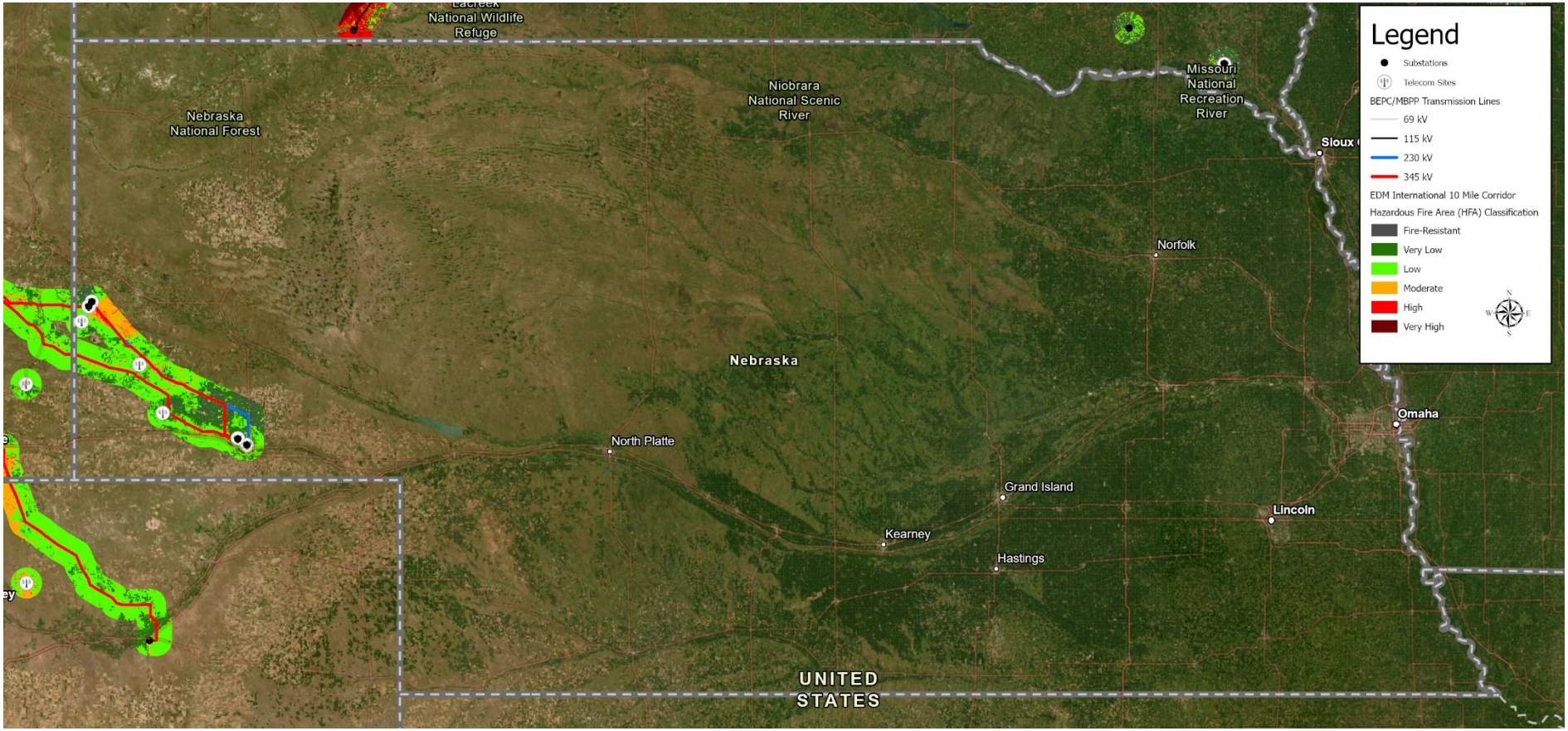
Iowa


Sioux Falls
Mason City
Driftless Area
National Wildlife
Refuge
Sioux City
Waterloo
Dubuque
Iowa
Cedar Rapids
Iowa City
Des Moines
Davenport
Omaha
Legend
Substations
Telecom Sites
BEPC/MBPP Transmission Lines
69 kV
115 kV
230 kV
345 kV
EDM International 10 Mile Corridor
Hazardous Fire Area (HFA) Classification
Fire-Resistant
Very Low
Low
Moderate
High
Very High
N
W
E
S

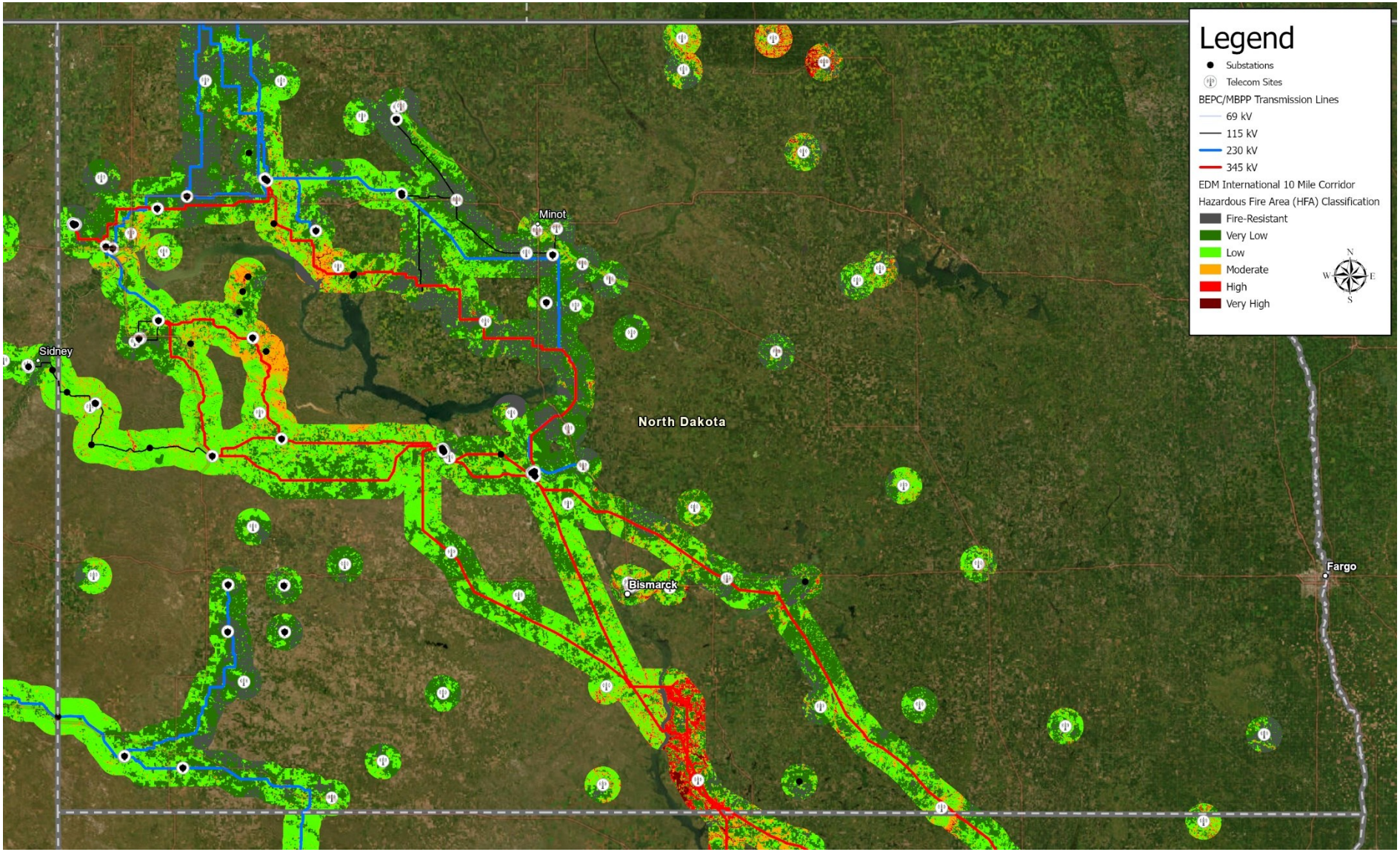
Montana


Castle Wildland
Grasslands National Park Of Canada
Grasslands Protected Area
Glacier National Park
Kootenai National Forest
Havre
Malta
Kalispell
Glasgow
Wolf Point
Flathead National Forest
Upper Missouri River Breaks National Monument
Charles M. Russell National Wildlife Refuge
Sidney
Coeur d'Alene National Forest
Great Falls
St. Joe National Forest
Montana
Glendive
Missoula
Helena National Forest
Lewis & Clark National Forest
Helena
Clearwater National Forest
Billings
Beaverhead-Deerlodge National Forest
Custer Gallatin National Forest
Red Rock Lakes National Wildlife Refuge
Yellowstone National Park
Bighorn National Forest
Gillette
Legend
Substations
Telecom Sites
BEPC/MBPP Transmission Lines
69 kV
115 kV
230 kV
345 kV
EDM International 10 Mile Corridor
Hazardous Fire Area (HFA) Classification
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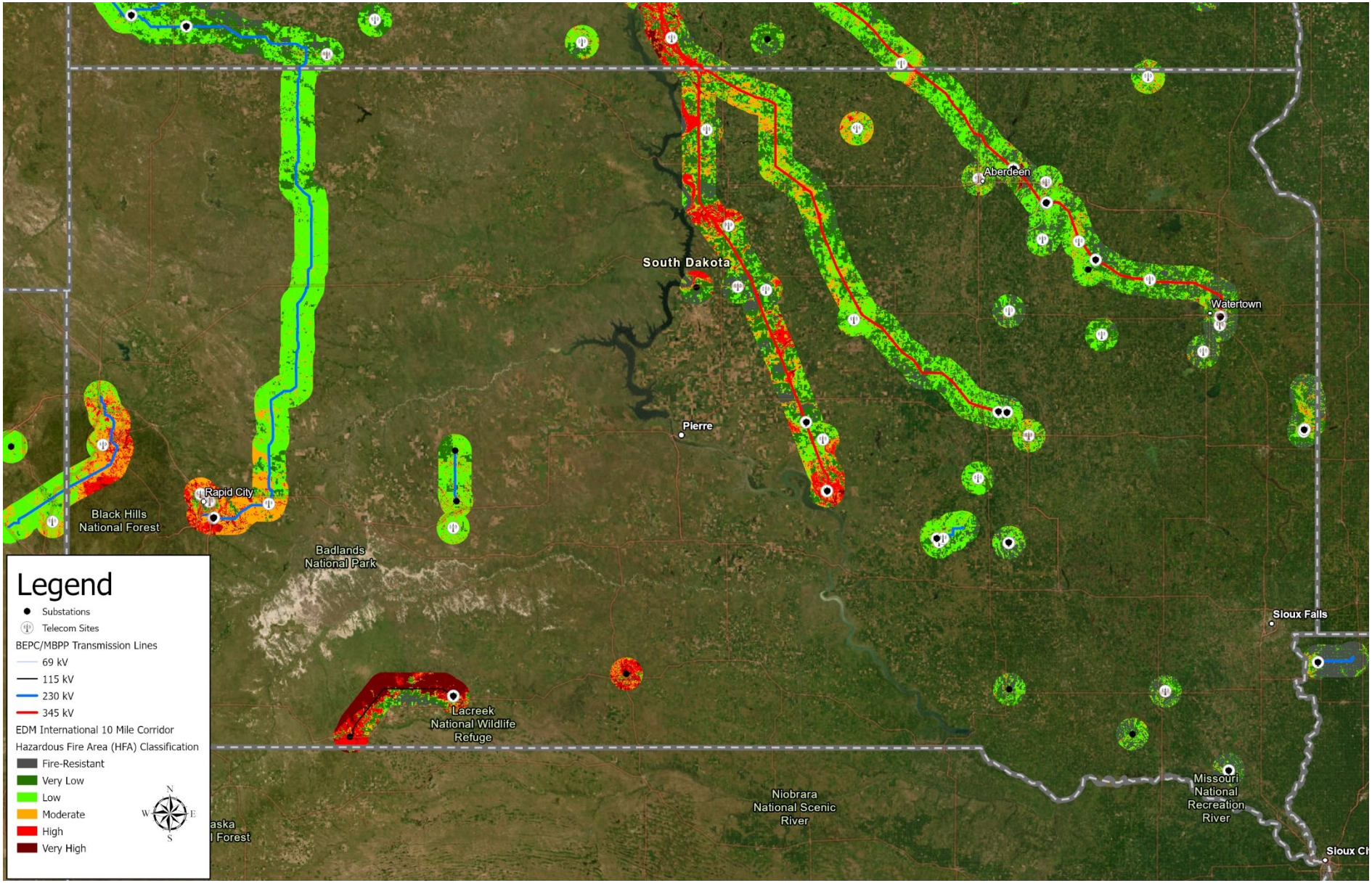
Nebraska


National Wildlife Refuge
Nebraska National Forest
Niobrara National Scenic River
Missouri National Recreation River
Sioux
Norfolk
Nebraska
Omaha
North Platte
Grand Island
Lincoln
Kearney
Hastings
UNITED STATES
Legend
Substations
Telecom Sites
BEPC/MBPP Transmission Lines
69 kV
115 kV
230 kV
345 kV
EDM International 10 Mile Corridor
Hazardous Fire Area (HFA) Classification
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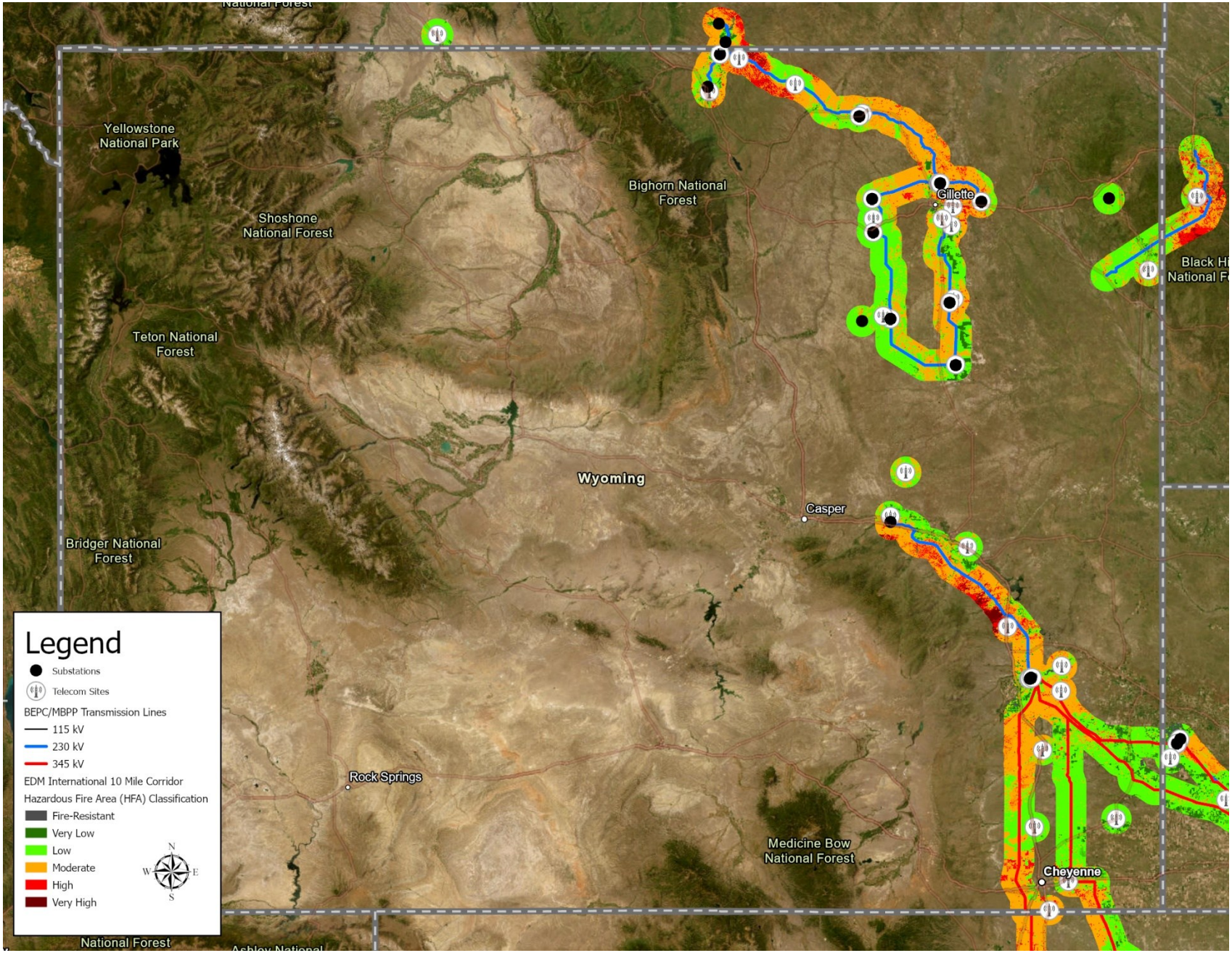
North Dakota



South Dakota



Wyoming


Yellowstone National Park
Shoshone National Forest
Bighorn National Forest
Gillette
Teton National Forest
Wyoming
Casper
Bridger National Forest
Rock Springs
Medicine Bow National Forest
Cheyenne
Legend
Substations
Telecom Sites
BEPC/MBPP Transmission Lines
115 kV
230 kV
345 kV
EDM International 10 Mile Corridor
Hazardous Fire Area (HFA) Classification
Fire-Resistant
Very Low
Low
Moderate
High
Very High
N
W
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S

9.3 Appendix C: Estimated Incremental Costs to Implement the WMP

Implementation Costs (Excluding Montana)

- Decrease in efficiency –$178,000 per year in lost productivity.
- Additional Staff Time – $102,000 per year.
- Total - $280,000 total in annual costs

9.4 Appendix D: Wyoming-Specific Legislation and Regulatory Requirements

Figure D-1. Wyoming overhead transmission facilities and associated wildfire risk classification using Basin Electric's EDM 10-mile buffer methodology.

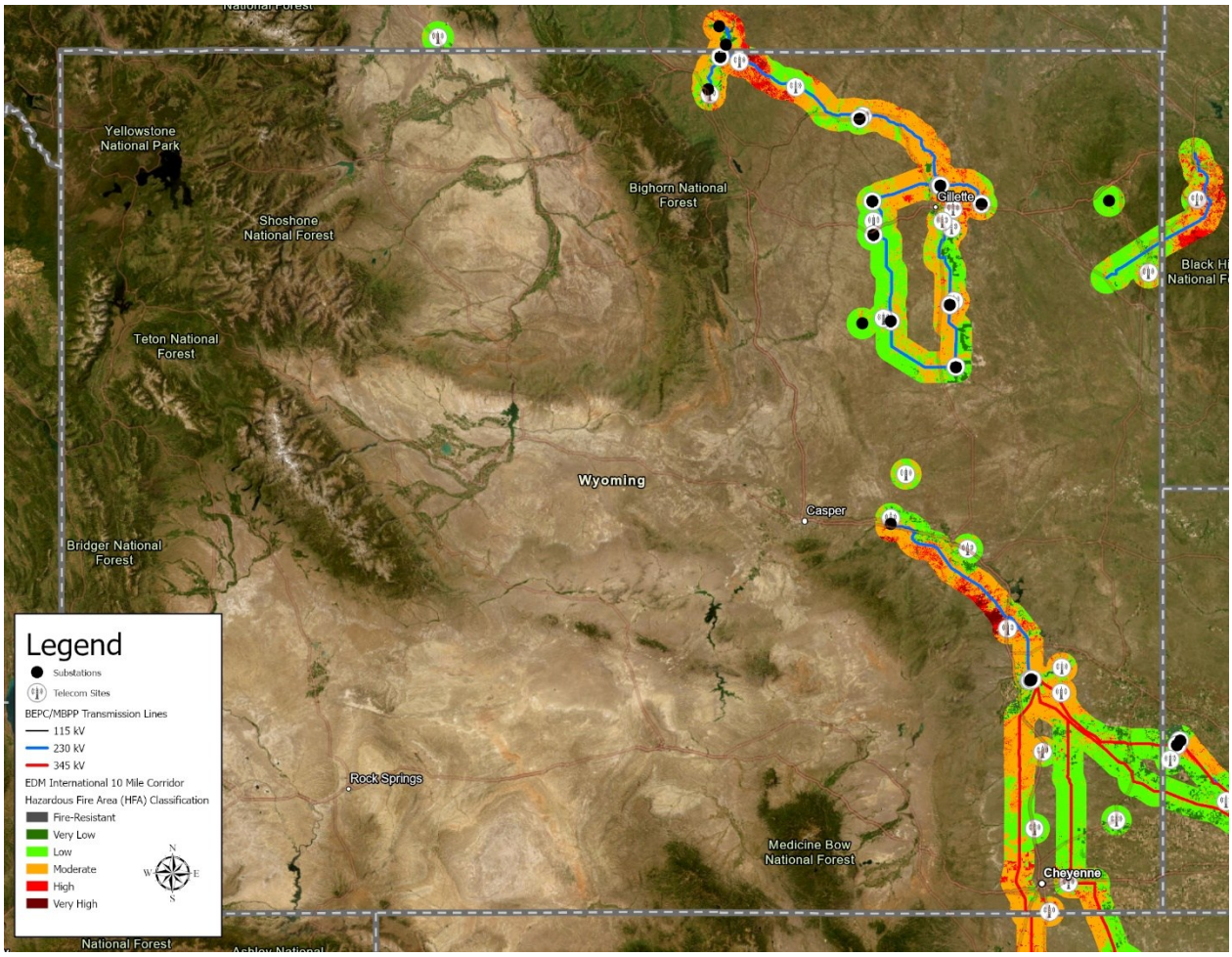


Figure D-2. Wyoming overhead transmission facilities and associated wildfire hazard classification using the U.S. Forest Service Wildfire Hazard Potential (WHP) 10-mile buffer methodology.

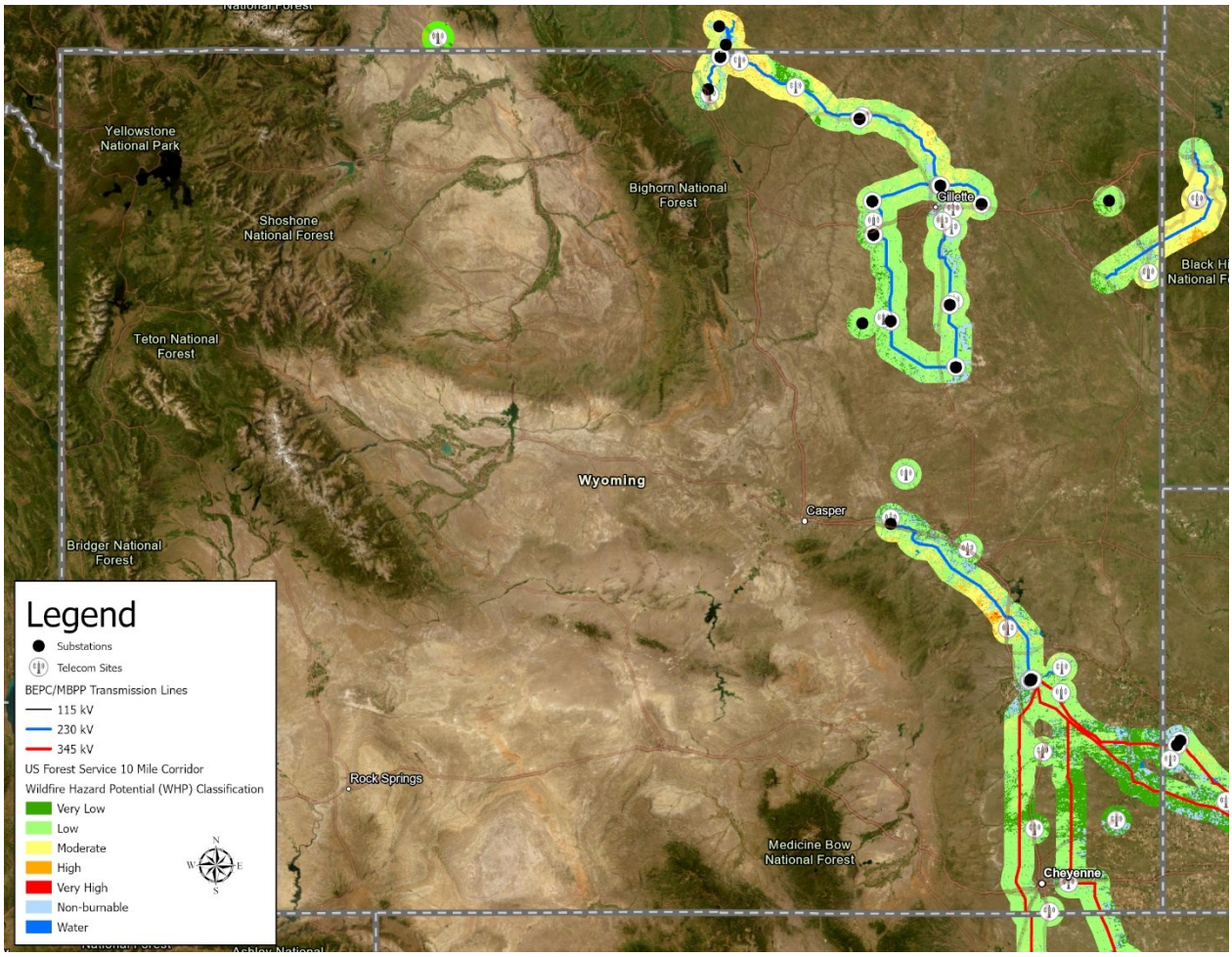


Table D-1. Comparison of Wyoming transmission asset exposure within High and Very High Wildfire Hazard Areas using the EDM methodology (Figure D-1) and the U.S. Forest Service Wildfire Hazard Potential (WHP) model (Figure D-2).

Asset Type	Total Circuit-Miles (WY)	EDM High & Very High-Risk Circuit Miles	EDM % of Total	WHP High & Very High-Risk Circuit Miles	WHP % of Total
Transmission (all overhead)[1]	889.4	30.6	3.4%	5.2	0.6%
Distribution	0	0	0%	0	0%
Total	889.4	30.6	3.4%	5.2	0.6%

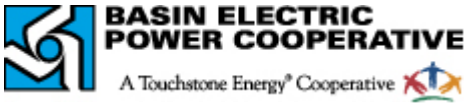
[1] Values include lines where BEPC is joint owner.

Table D-2. Basin Electric Power Cooperative's shared Wyoming transmission facilities and associated ownership and maintenance responsibilities.

Facility or Line Name	County	Ownership	Maintenance Entity
WYODAK to Reno 230 kV	Campbell	PRECORP	BEPC
Reno to Teckla 230 kV	Campbell	PRECORP	BEPC
Teckla to Antelope Mine 230 kV	Campbell	PRECORP	BEPC
LRS 230 West to Dave Johnston 230 kV	Converse, Platte	MBPP	Tri-State
LRS 345 West to Ault 345 kV	Laramie, Platte	MBPP	Tri-State
LRS 345 West to Keota 345 kV	Goshen, Laramie, Platte	MBPP	Tri-State
LRS 345 East to Sidney 345 kV	Goshen, Platte	MBPP	BEPC
LRS 345 East to Stegall 345 kV	Goshen, Platte	MBPP	BEPC
LRS 230 West to Stegall 230 KV	Goshen, Platte	MBPP	BEPC

[1] **Abbreviations:** MBPP = Missouri Basin Power Project; PRECORP = Powder River Energy Corporation; BEPC = Basin Electric Power Cooperative; Tri-State = Tri-State Generation & Transmission Association, Inc. Missouri Basin Power Project facilities are jointly owned by BEPC and Tri-State. Basin Electric coordinates with applicable co-owners regarding operations, maintenance, wildfire mitigation activities, emergency response actions, and restoration activities associated with shared transmission facilities. Facility and line names reflect Basin Electric's asset management and transmission system naming conventions.

Figure D-3. Basin Electric Wildfire Mitigation Plan Submittal Letter to the Wyoming Public Service Commission.



November 19, 2026

Wyoming Public Service Commission
Hansen Building
2515 Warren Avenue, Suite 300
Cheyenne, WY 82002

Dear Commissioners:

Basin Electric Power Cooperative (BEPC) respectfully submits its Wildfire Mitigation Plan (WMP) for review and approval pursuant to Wyoming Statute 37-3-403 and 37-3-404.

BEPC is a generation and transmission cooperative serving a large, multi-state service territory across the Northern Great Plains and Upper Midwest. While much of BEPC's service territory is characterized by grassland, agricultural landscapes, and comparatively lower wildfire risk than some regions of the western United States, BEPC recognizes that wildfire risk remains present and requires a proactive approach to mitigation, preparedness, response, and continuous improvement.

The WMP submitted to the Commission represents BEPC's first comprehensive wildfire mitigation plan. The Plan builds upon longstanding practices related to system maintenance, vegetation management, weather monitoring, emergency response, and stakeholder coordination while establishing a formal framework for wildfire risk evaluation and mitigation across BEPC's transmission system.

During development and review of the Plan, BEPC sought input from stakeholders consistent with the requirements of Wyoming Statute 37-3-403(a)(xii). Stakeholder comments received from the Wyoming State Forestry Division, Guernsey Rural Fire District, and Campbell County Fire Department were reviewed and considered during the WMP development process. The stakeholder comments and BEPC's responses are included in Appendix D of the Plan.

In addition, BEPC worked closely with Commission Staff during the review process and incorporated numerous enhancements to the WMP. Significant revisions made during the review process include:

- Development of Wyoming-specific appendices, including transmission asset exposure, wildfire risk mapping, and shared facility information.

- Expansion of inspection, patrol, maintenance, and asset condition assessment program descriptions.
- Development of a structured Public Safety Power Shutoff (PSPS) decision-making framework, including operational, reliability, public safety, communication, and documentation considerations.
- Expansion of emergency communications, stakeholder coordination, community outreach, and emergency management provisions.
- Addition of Wyoming-specific comparisons of transmission asset exposure within High and Very High Fire Threat Areas (HFAs) utilizing both the EDM methodology and the U.S. Forest Service Wildfire Hazard Potential (WHP) model.
- Expansion of wildfire program governance, performance metrics, and continuous improvement processes.

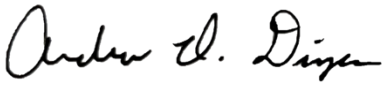
BEPC also provided supplemental items for confidential review, including Wyoming transmission asset GIS data, an updated Crisis Communication Plan, and a representative example illustrating the application of EDM's proprietary wildfire risk modeling methodology.

BEPC appreciates the time, effort, and constructive feedback provided by Commission Staff and participating stakeholders throughout the review process. The resulting Plan reflects both BEPC's existing wildfire mitigation practices and enhancements developed through collaboration with stakeholders and the Commission.

BEPC respectfully submits this Wildfire Mitigation Plan for the Commission's consideration and approval and remains committed to continuous improvement and ongoing collaboration with regulators, stakeholders, member cooperatives, and emergency response agencies.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,



Andrew Dinges
Transmission Risk & Compliance Program Coordinator
Basin Electric Power Cooperative
Transmission System Maintenance
2501 158th Street NE
Menoken, ND 58558

Figure D-4. The following comments were received during stakeholder outreach conducted pursuant to W.S. 37-3-403(a)(xii). Basin Electric reviewed and considered the input received from the Wyoming State Forestry Division, local fire agencies, and county stakeholders during development of the Wildfire Mitigation Plan. The comments received and Basin Electric's responses are provided below.

Wildfire Mitigation Plan stakeholder comments and Basin Electric responses

Questions and responses from the Wyoming State Forestry Division

A. Are the power poles replaced after a certain number of years in service?

BEPC does not use a fixed, time-based replacement schedule for wooden poles. Instead, poles are evaluated on a regular rotational basis using External testing company, along with routine inspections. Any poles that fail testing or show signs of deterioration are replaced promptly.

Over time, BEPC has also been upgrading existing lines originally constructed with wood poles to equivalent-strength steel structures. This transition is prioritized as assets reach end-of-life or are located in higher fire risk areas. All new BEPC transmission line construction uses steel poles, which provide improved durability and fire resistance.

B. During vegetation management work, is the vegetative material removed off site or left?

BEPC's preferred approach is to remove vegetation from the right-of-way. In most cases, woody vegetation is chipped on-site and then removed for off-site disposal.

BEPC also works with landowners to accommodate reasonable preferences. Some landowners choose to have chipped material spread on-site, which can provide soil benefits. Others may request trimming to meet minimum clearance requirements rather than full removal, although this is less common. This approach allows BEPC to maintain required clearances while also respecting landowner preferences where practical.

C. Have detection cameras been mentioned as a preventive method to detecting wildfires that may impact the power corridor?

BEPC has evaluated the use of detection cameras for wildfire monitoring. However, given the size of its transmission system and the fact that much of the system is located in areas of relatively low wildfire risk, implementation is not considered practical or cost-effective at this time.

Instead, BEPC relies on a combination of established tools to monitor wildfire risk and environmental conditions. This includes subscription-based weather services through the Data Transmission Network (DTN), along with other external data sources that provide information on weather patterns, forecasts, lightning activity, and near real-time conditions.

In addition, BEPC uses GIS-based tools that integrate wildfire data layers, including satellite-detected thermal activity, active fire perimeters, and historical wildfire information. These tools support ongoing situational awareness across BEPC's system.

Questions and responses from Guernsey Rural Fire District

A. I could find nothing in the plan that addressed, mentioned or pertained to fire suppression on BEPC property or facilities, nor did I find any reference to any formal coordination between BEPC and any fire suppression agency or entity in the Draft Plan or in its creation. While the Laramie River Station has developed a strong professional relationship with the Wheatland Fire District and effective protocols for response, that sort of cooperative activity is not addressed by the Wildfire Mitigation Plan.

BEPC recognizes the importance of coordinating with fire suppression agencies and supporting response activities when wildfire events occur. While the Wildfire Mitigation Plan (WMP) does not include a section dedicated solely to fire suppression activities, coordination with fire agencies and emergency responders is addressed throughout the Plan, particularly within the Emergency Action Plan (EAP) and stakeholder engagement sections. BEPC's role during wildfire events is to support responding agencies by providing system information, coordinating safe operation of electrical infrastructure, and taking appropriate actions such as de-energization or restoration when needed.

BEPC works with local fire departments, emergency management organizations, and other response partners as situations require. These relationships may vary across BEPC's large, multi-state service territory, but the approach remains consistent by supporting local authorities who have primary responsibility for fire suppression while ensuring electrical system safety.

BEPC maintains coordination with fire response agencies across its system, including site-specific relationships such as the coordination in place at Laramie River Station. These partnerships reflect BEPC's broader approach of working with local responders to ensure safe and effective response around electrical infrastructure. As part of the WMP review process, additional language was added to Sections 6.1, 6.1.1, and 7.1.1 regarding emergency communications, stakeholder coordination, communication pathways, and response activities to provide greater clarity regarding coordination with emergency management agencies, fire response organizations, and other stakeholders.

B. The second point is that at least one local fire suppression district has received a verbal caution against using water from the Grayrocks Reservoir in fire suppression activities in the area surrounding the reservoir - including Laramie River Station and other nearby properties. It seems likely that the individual expressing the warning was either misinformed regarding BEPC policy or expressing personal views that may not be in keeping with actual policies. It could be beneficial if a statement supporting unimpeded use of surface water

resources under BEPC control, for fire suppression, were included in the Wildfire Mitigation Plan to avoid any such mistakes in the future.

BEPC appreciates this comment and the importance of clear communication regarding the use of available resources during fire suppression activities. Based on the information provided, this appears to be a site-specific matter that is not representative of BEPC's overall wildfire mitigation program or policies as outlined in the Wildfire Mitigation Plan (WMP). As such, BEPC believes this topic is more appropriately addressed outside of the WMP itself.

BEPC will review this matter internally and work directly with the appropriate local agencies and stakeholders to clarify expectations regarding the use of surface water resources for fire suppression, including at and around facilities such as Laramie River Station. BEPC is committed to supporting safe and effective wildfire response efforts and will ensure that any misunderstandings are addressed through direct coordination with local fire response partners.

Questions and responses from Campbell County Fire Department

A. Add measurable fire weather thresholds and operational trigger points (wind speed, RH, ERC, Red Flag criteria, etc.).

BEPC utilizes National Weather Service Red Flag Warnings (RFWs) as the primary threshold for implementing work activity restrictions. Upon issuance of a new RFW, field personnel and supervisory staff are immediately notified via email. These notifications include detailed information regarding the geographic areas affected and the duration of the warning. The information is continuously updated based on real-time alerts from the National Weather Service to ensure situational awareness remains current.

Each RFW notification also contains an embedded link to BEPC's GIS-based RFW mapping tool, which is accessible on both desktop and mobile devices, enabling field personnel to readily assess conditions and applicable restrictions in their immediate work areas.

As part of the WMP review process, Section 5.3.1 was expanded to provide additional language regarding BEPC's Work Restriction Matrix and its role in implementing wildfire mitigation measures during Red Flag Warning conditions. The revised section describes how activity-specific operational restrictions and mitigation requirements are applied based on the ignition potential of field activities during elevated fire weather conditions.

B. Expand local coordination procedures with AHJs, county emergency management, dispatch centers, and fire agencies. This includes possibly adding an appendix with contact information for the different regions.

BEPC recognizes the importance of coordinating effectively with local authorities having jurisdiction (AHJs), county emergency management agencies, dispatch centers, and fire response organizations. As outlined in the Wildfire Mitigation Plan (WMP), BEPC works

with these organizations through its Emergency Action Plan (EAP), established communication pathways with Transmission Operators (TOPs), member cooperatives, and ongoing coordination with state and local emergency management organizations. BEPC also maintains communication with emergency responders and other stakeholders as needed to support wildfire preparedness, response, and restoration activities.

As a generation and transmission cooperative operating across a large, multi-state footprint, BEPC relies on a consistent coordination approach that can be applied across multiple states and jurisdictions. This includes coordination with Transmission Operators (TOPs), member cooperatives, county emergency management agencies, state emergency management organizations, fire response agencies, and other stakeholders associated with areas where BEPC owns, operates, or maintains transmission facilities.

As part of the WMP review process, Sections 6.1, 6.1.1, and 7.1.1 were expanded to provide additional information regarding emergency communications, stakeholder coordination, communication pathways, and maintenance of emergency contact information. The updated Crisis Communication Plan (CCP) also includes emergency contact information and communication protocols used to support coordination during wildfire events and other emergencies. The CCP has been provided to the Wyoming Public Service Commission on a confidential basis for review.

C. Formalize wildfire operational restrictions during elevated fire weather conditions, including work stoppage criteria and field operational matrices.

See response to Question A. BEPC's approach, as described above, establishes the use of National Weather Service Red Flag Warnings (RFWs) as the trigger for implementing wildfire-related operational restrictions, including work stoppage criteria and associated field-level controls.

These restrictions are communicated through established processes, including real-time notifications to field personnel and the use of a Work Restriction Matrix. Together, these elements provide a clear and repeatable framework for managing operations during elevated fire weather conditions.

As part of the WMP review process, additional language was added to Section 5.3.1 describing BEPC's Work Restriction Matrix and its role in implementing wildfire mitigation measures during Red Flag Warning conditions. The revised section describes how activity-specific operational restrictions and mitigation requirements are applied based on the ignition potential of field activities during elevated fire weather conditions.

D. Strengthen Public Safety Power Shutoff (PSPS) procedures with clearer operational guidance, notification timelines, and restoration criteria. The key will be ensuring the public knows what to expect.

BEPC recognizes the importance of having clear PSPS procedures, including how decisions are made and how information is communicated. As described in the WMP,

PSPS may be used as a wildfire mitigation measure to reduce the risk of utility-caused ignitions by intentionally de-energizing transmission facilities when warranted by existing conditions.

BEPC's approach is based on informed, situation-specific decision-making in coordination with its Transmission Operators (TOPs), who are responsible for real-time system operations. These decisions consider fire weather conditions, system conditions, and overall impacts to public safety and reliability. Communication during these events is supported through BEPC's Emergency Action Plan (EAP), Crisis Communication Plan (CCP), and coordination with member distribution cooperatives. As a G&T cooperative, BEPC works through these member systems, which serve as the primary point of contact with end-use customers.

As part of the WMP review process, BEPC revised the PSPS section to provide a structured decision-making framework for evaluating potential transmission de-energization events. The revised section identifies decision authority, evaluation factors, operational and reliability considerations, public safety impacts, communication requirements, and documentation expectations associated with potential PSPS actions. Additional language was also added regarding coordination and communication efforts related to de-energization events, including coordination with affected utilities, Transmission Operators, and emergency management agencies.

E. Add utility-fire unified command concepts and stronger ICS/NIMS integration during wildfire incidents. Clearly outlining how we can work together to mitigate hazards as quickly as possible.

BEPC recognizes the importance of coordinating effectively with emergency responders, emergency management agencies, and other stakeholders during wildfire events. As outlined in the WMP, BEPC supports wildfire response efforts through its Emergency Action Plan (EAP) and by coordinating closely with its Transmission Operators (TOPs), first responders, and local emergency management agencies. During an incident, BEPC's role is to provide system information, support safe operations around electrical infrastructure, and coordinate actions such as de-energization or restoration when needed.

BEPC does not serve as the incident command authority during wildfire incidents. Instead, BEPC personnel support and coordinate with the agencies having jurisdiction to ensure utility operations are aligned with response activities and public safety objectives. Coordination is further supported through member cooperatives, Transmission Operators, and other operating partners.

F. Include formal ignition investigation procedures, evidence preservation expectations, and coordination with fire investigators/AHJs. This can be especially important when competing priorities of power restoration and the investigation are up against each other.

BEPC recognizes the importance of supporting ignition investigations, including coordination with fire investigators and preservation of relevant information. As outlined in the WMP, BEPC already collects and reviews system event data through its outage tracking, inspection programs, and internal reporting processes. These activities support identifying causes and ensuring appropriate follow-up when issues occur.

Given the very low frequency of utility-related wildfire events on BEPC's high-voltage transmission system, formal ignition investigations have been limited. However, BEPC is prepared to support investigations if they do occur. In the event of a potential ignition, BEPC will coordinate with the appropriate agencies, provide available system data, and support safe access to facilities. BEPC will also work with responding agencies to appropriately balance restoration efforts with the need to preserve evidence.

G. Define enhanced vegetation clearance criteria and hazard tree standards in higher-risk wildfire areas. Are there specific standards you are trying to meet when doing this? If so, where does that recommendation come from?

BEPC recognizes the importance of applying effective vegetation management practices, including maintaining adequate clearances and addressing hazard trees, particularly in areas of elevated wildfire risk. As outlined in the Wildfire Mitigation Plan (WMP), BEPC maintains a comprehensive vegetation management program that includes routine inspections, clearance work within the right-of-way, and identification and removal of off right-of-way hazard trees that could impact transmission facilities.

BEPC's program is aligned with applicable industry standards, including ANSI A300 and NERC FAC-003 requirements, which establish minimum vegetation clearance distances for transmission lines. While these standards provide the baseline for vegetation management, BEPC typically maintains clearances that exceed these minimum requirements. For example, for all 345 kV transmission lines, BEPC maintains approximately 25 feet of clearance, which is significantly greater than applicable minimum requirements.

BEPC believes this approach provides an effective and practical balance between maintaining system reliability, managing wildfire risk, and operating across a large and diverse service territory.

H. Add county coordination annexes and formal interagency communication procedures. If an incident happens “here” then we communicate with a, b, and c.

BEPC recognizes the value of clear coordination procedures with local agencies, including counties, emergency management organizations, dispatch centers, and fire response agencies. As outlined in the WMP, BEPC supports coordination through its Emergency Action Plan (EAP), established communication pathways, and ongoing engagement with Transmission Operators (TOPs), member cooperatives, emergency management agencies, and local responders.

Given BEPC's large footprint and the number of jurisdictions involved, BEPC utilizes a consistent coordination framework that can be applied across multiple states and service territories rather than maintaining location-specific response annexes. This approach allows coordination processes to remain practical, scalable, and adaptable to the circumstances of individual events.

As part of the WMP review process, additional language was added to Sections 6.1, 6.1.1, and 7.1.1 regarding emergency communications, stakeholder coordination, communication pathways, and maintenance of emergency contact information. The updated CCP also includes emergency contact information and communication protocols that support coordination with emergency management agencies, fire response organizations, Transmission Operators, member cooperatives, and other stakeholders during wildfire events and other emergencies.

I. Add restoration prioritization protocols and critical infrastructure coordination procedures during wildfire events. How do we as the locals know?

BEPC recognizes the importance of a clear and consistent approach to restoration following wildfire events, including coordination with critical infrastructure and stakeholders. As described in the WMP, BEPC prioritizes restoration efforts based on system needs and operational importance. This includes giving priority to key transmission lines, substations, and facilities that support critical loads and overall system reliability.

As a generation and transmission cooperative, BEPC works closely with its Transmission Operators (TOPs) and member distribution cooperatives during restoration. Member cooperatives play an important role in identifying local needs and communicating with end-use customers and critical services. Given the structure of BEPC's system and the relatively limited history of wildfire-related outages, restoration would be managed based on the specific circumstances of each event rather than through highly detailed procedures.

Restoration activities are coordinated through BEPC's Emergency Action Plan (EAP), Crisis Communication Plan (CCP), Transmission Operators (TOPs), member cooperatives, and other stakeholders as appropriate for the event. The WMP also includes additional information regarding restoration priorities, emergency communications, stakeholder coordination, and communication pathways associated with wildfire events. BEPC believes this approach provides an effective and flexible framework for restoration while supporting coordination with local need