2025 WILDFIRE MITIGATION PLAN

WMP

IDAHO POWER®

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Executive Summary

Idaho Power is dedicated to the safety of its customers and communities, and to safely delivering reliable, affordable energy. The company's Wildfire Mitigation Plan (WMP) constantly evolves in pursuit of that mission.

Idaho Power's WMP provides holistic and prudent strategies to improve safety, reliability, and affordability for our customers and the communities we serve. Its purpose is to guide mitigation strategies and reduce risk.

The 2025 WMP is Idaho Power's fifth annual edition of this document. It includes:

- Descriptions of Idaho Power's efforts to protect, or "harden," the grid against wildfires and other natural emergencies
- Maps of wildfire risk zones across our service area
- An explanation of our Fire Potential Index (FPI), including how it was developed and is being implemented
- Descriptions of work being done to protect our power lines from trees and other vegetation
- A description of our Public Safety Power Shutoff (PSPS) plan

Throughout 2024, Idaho Power worked to reduce wildfire risk by hardening our electrical system, expanding situational awareness capabilities, further enhancing our vegetation management programs, and upgrading our risk modeling practices. The company also spent significant resources responding to damage caused by dozens of wildfires across our service area.

In this Executive Summary, we provide a comprehensive overview of the 2024 wildfire season, lessons learned from it, and a snapshot of our progress toward system-wide wildfire mitigation objectives.

WMP Approach and Progress

Idaho Power's WMP prioritizes the safety of the customers and communities we serve and supports the resiliency of Idaho Power's transmission and distribution (T&D) system.

The WMP's fundamental goals are to:

- Reduce wildfire risk associated with the company's T&D equipment and related field operations.
- Improve the resiliency of Idaho Power's T&D system in a wildfire event, independent of the ignition source.

Mitigating Wildfire Risk

Idaho Power deploys a variety of wildfire risk mitigation activities through its WMP. As displayed in Figure 1, the company's strategy to reduce wildfire risk is multi-pronged and involves activities and actions to: 1) reduce the likelihood of wildfire, 2) reduce the intensity of wildfire, and 3) reduce susceptibility to wildfire.

Reducing the likelihood of wildfire primarily involves efforts like overhead circuit hardening, undergrounding, enhanced vegetation management and situational awareness through deployment of fire weather station networks, and advanced risk modeling. These are identified and adopted based on a variety of factors, including industry best practices for reducing wildland fire risk, evaluation of inherent risk across the service area, and with consideration of alternatives.

To reduce susceptibility to wildfires, Idaho Power focuses on education and communication, specifically engagement with government agencies, industry entities, expert forums, public safety partners, and electric utility peers to build our understanding of wildfire risk and commonality of wildfire mitigation plans. Simultaneously, the company uses historical climatology and climate projections to identify current and potential changes in future fire risk. In addition, Idaho Power adds protective mesh to wood transmission poles to protect the poles from wildfire—specifically in wildfire risk zones or areas prone to wildfire.

Finally, to reduce the intensity of wildfire, Idaho Power works to reduce the amount of available fuel that can burn. These efforts include fuel reduction partnerships and pole clearing. Idaho Power is also piloting a program for deploying wildfire detection cameras that can improve the speed and effectiveness of response to wildfires.

Figure 1
Approach to Wildfire Mitigation

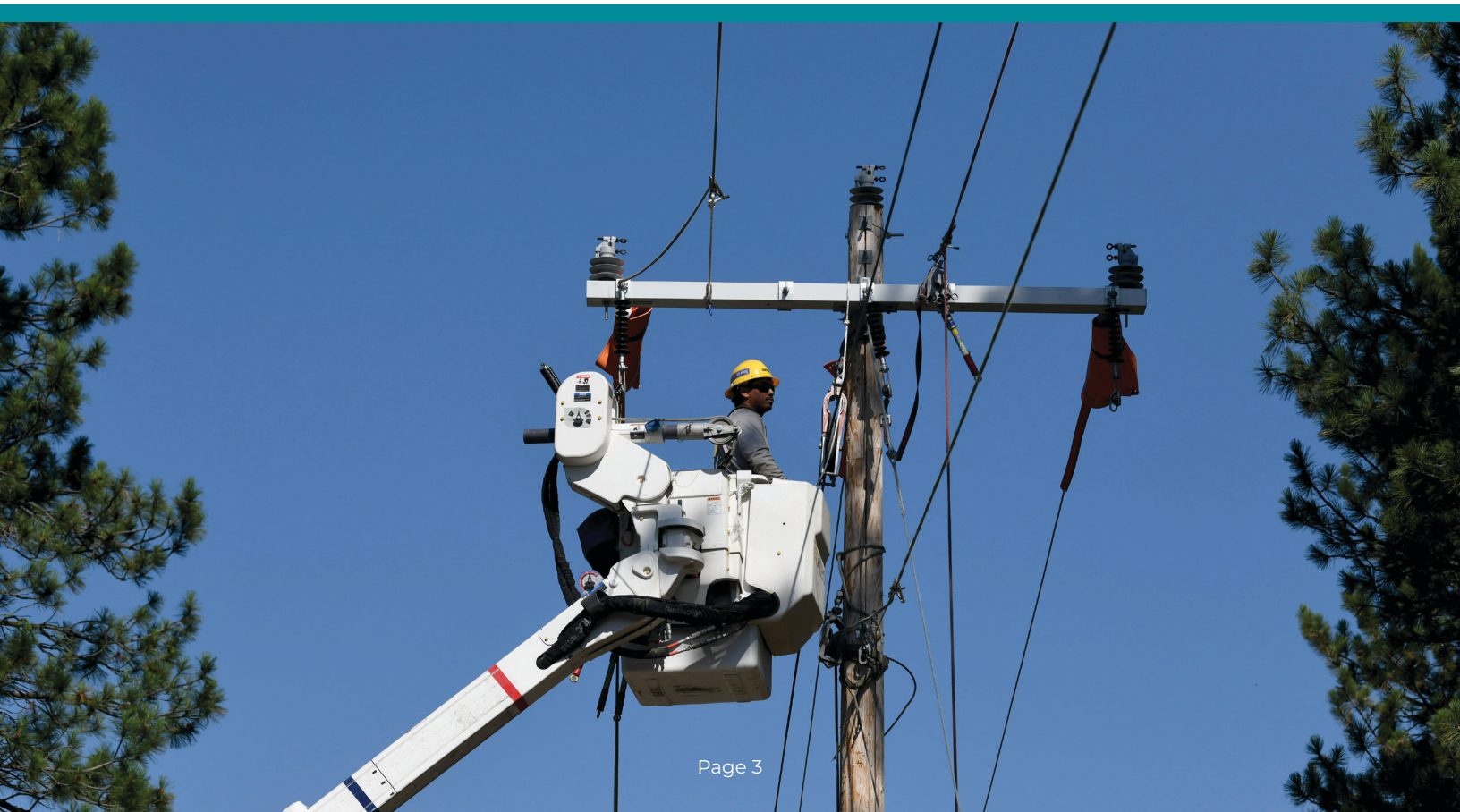
2024 Wildfire Mitigation Goals and Accomplishments

Each year, Idaho Power develops high-level goals associated with its WMP. Idaho Power met or exceeded the established goals for 2024.

Table 1
Grid hardening and situational awareness

Initiative	Wildfire Mitigation Plan Activities	2024 System Goal	2024 Completed (ID)	2024 Completed (OR)	Total % Complete	2025 Planned (ID)	2025 Planned (OR)
	Distribution System Hardening						
System Hardening*	System Hardening (miles)	75	80	4	112%	85	5
	Overhead Line Miles Converted to Underground	—	—	—	100%	2	—
	Segmentation Devices						
Feeder Segmentation	Installation or Relocation of Automatic Reclosing Devices	25	33	9	168%	41	3
	Transmission Fire Mesh Installation						
Fire Resistant Mesh	Number of Poles Protected	700	701	90	113%	648	56
	Situational Awareness						
Situational Awareness	Weather Station Installation	5	4	1	100%	80	5
	Wildfire Detection Camera Site Establishment**	6	6	—	100%	2	1

*Excludes hardening work outside of wildfire risk zones
**Idaho Power collaborates with federal, state, and local agencies to identify and establish wildfire detection camera sites. The Bureau of Land Management (BLM) Idaho established one of the sites Idaho Power planned to establish in 2024.



Grid Hardening

Idaho Power's grid hardening program includes systematic replacement of hardware, equipment, and materials to improve safety and reliability and provide for additional wildfire protections. The 2024 grid hardening program resulted in the hardening of 84 line miles in Tier 3 wildfire risk zones across the company's service area. Idaho Power plans to harden an additional 90 line miles in 2025.

Feeder Segmentation

Segmentation is a strategy that isolates portions of feeders in areas of higher wildfire risk from areas of lower risk, improving reliability for customers outside wildfire risk zones and, in the event of an outage, expediting restoration. Segmentation is most efficiently accomplished through remote-controlled devices instead of manual adjustments performed in the field.

In 2024, as part of our work to isolate circuit segments, Idaho Power installed 42 automatic reclosing (AR) devices (reclosers), upgraded 10 controllers, and upgraded remote communication capabilities for 74 AR devices in wildfire risk zones. This work, along with communication upgrades to existing reclosers, decreased PSPS impacts for approximately 70,000 customers.

In 2025, Idaho Power plans to complete approximately 44 automatic recloser installations or upgrades throughout its service area to improve remote communication capabilities to distant segmentation devices.

Strategic Undergrounding

Idaho Power uses strategic undergrounding as a wildfire mitigation strategy in Tier 3 Zones. Strategic undergrounding enhances the distribution system's resiliency by burying targeted powerlines. This reduces the risk of wildfires.

In 2024, the company identified seven miles of overhead powerlines for underground conversion through 2026 and began developing designs. Underground conversion projects require extensive planning for trenching, boring, and route optimization. The design phase also considers geological permitting challenges, such as securing permits and coordinating with local agencies, which can significantly lengthen timelines. The company prioritizes candidate circuits or portions of circuits for underground conversion by considering the following:

- Wildfire risk modeling and quantification, showing areas with elevated risk of wildfire spread and impacts to people and property
- Fire history where overhead powerlines may be susceptible to repeated wildfire events over their lifetime
- Areas with minimal egress or evacuation routes
- Areas with limited ingress or fire suppression resources
- Circuits with a higher likelihood of experiencing a fault due to external conditions, such as lightning or contact from a tree that falls into the powerline
- Areas with historic weather patterns that increase the potential of repeated PSPS events
- Areas in wildfire risk zones that have limited access or present difficulties in performing inspections or maintenance
- Feedback from local officials or fire agencies on topography and fuels in areas conducive to rapid fire spread that may impact highly valued resources, watersheds, or critical facilities

Fire-Resistant Mesh Installation

To improve the resiliency of Idaho Power's transmission system, the company wraps wood transmission poles in wildfire risk zones with a fire-resistant mesh. The mesh wrap helps protect the integrity of the pole if it is exposed to wildfire. In 2024, 791 poles were wrapped with fire-resistant mesh across Idaho Power's service area. An additional 704 poles are scheduled to be wrapped in 2025.

Situational Awareness

Fire Weather Stations: Idaho Power's Atmospheric Sciences department uses high-resolution modeling and forecasting capabilities, combined with existing fire weather stations and publicly available weather and fuel data, to develop and circulate daily FPI forecasts. This information informs field personnel practices and operational settings during days with increased fire potential. FPI forecasts are also used in conjunction with Idaho Power's weather forecasting efforts to detect extreme weather events that may trigger a PSPS. Idaho Power installed five fire weather stations in Tier 3 wildfire risk zones in 2024 and plans to install approximately 85 additional fire weather stations in or near tier 2 and 3 zones in 2025.

Wildfire Detection Cameras: Idaho Power works with ALERTWest to install wildfire detection cameras. Firefighting agencies and Idaho Power can use the camera feeds to quickly detect wildfire, track real-time weather and fuel conditions, and allow first responders to better allocate the appropriate assets in the event of a fire.

In 2024, Idaho Power collaborated with ALERTWest to install five wildfire detection cameras in Idaho. The Bureau of Land Management (BLM) Idaho brought a sixth site online in Idaho Power's service area. Through coordination with the Idaho Department of Lands, BLM Idaho, and Oregon Wildfire Detection Camera Interoperability Committee, Idaho Power secured access to an additional nine ALERTWest wildfire detection camera sites across its Idaho and Oregon service areas. This network will provide critical data on how wildfire detection technology can mitigate risks, reduce wildfire impact, and enhance safety for Idaho Power's customers.

By working closely with federal, state, and local public safety partners, Idaho Power achieved significant cost savings for its installed sites. In some cases, local partners provided tower space at no cost, or installations were designed to eliminate the need for towers. Idaho Power will continue to collaborate with these agencies to identify future camera locations, focusing on opportunities that deliver mutual benefits and cost efficiencies.

Table 2 provides a snapshot of Idaho Power's asset inspection and vegetation management activity in 2024 and goals for 2025. Idaho Power met or exceeded its 2024 goals as established in the WMP.

Table 2
Inspection and vegetation management program summary

Initiative	Wildfire Mitigation Plan Asset Inspection and Vegetation Management Initiatives	2024 Goal (OR and ID)	2024 Completed (ID)	2024 Completed (OR)	Total % Complete	2025 Goal (ID)	2025 Goal (OR)
Asset Inspections	**Transmission Inspections**						
	Wildfire Pre-Season Patrol—Tier 3 Zones (Structures)	1,455	1,114	341	100%	1,114	341
	Ignition Prevention Inspections (OR Division 24) (structures)	341	n/a	341	100%	n/a	341
	Infrared Thermography Patrol (Structures)	1,455	1,114	341	100%	1,114	341
	Distribution Inspections						
	Wildfire Pre-Season Patrol—Tier 3 Zones (Poles)	21,162	19,382	1,780	100%	19,382	1,780
	Ignition Prevention Inspections (OR Division 24) (Poles)	1,780	n/a	1,780	100%	n/a	1,780
	Infrared Thermography Patrol—Tier 3 Zones (Poles)	5,000	4,948	921	117%	4,000	1,000
Vegetation Management	**Pruning Cycle**						
	Transition to a 3-Year Pruning Cycle (Circuits)	291	320**	9	110%**	150	37
	Enhanced Vegetation Management						
	Annual Patrol—Tier 2 & 3 Zones (Circuits)	149	139	13	102%	139	13
	Annual Mitigation—Tier 2 & 3 Zones (Circuits)	149	139	13	100%	139	13
	Mid-Cycle Patrols—Tier 2 & 3 Zones (Circuits)	26	•	•	100%	7	—
	Mid-Cycle Pruning—Tier 2 & 3 Zones (Circuits)	26	+	+	100%	7	—
	Hazard Trees Identified and Pruned	100% of All Identified	32	—	100%	100% of All Identified	100% of All Identified
	Hazard Trees Identified and Removed	100% of All Identified	50	—	100%	100% of All Identified	100% of All Identified
	Audits of Pruning Activities—Tier 2 & 3 Zones (Worksites)	100% of All Identified	3,035	169	100%	100% of All Identified	100% of All Identified

** Value is a 2024-year end projection based on progress experienced through the first three quarters of the year.
• Accomplished with Annual Patrol in 2024 (reported above)
+ Accomplished with Annual Mitigation in 2024 (reported above)

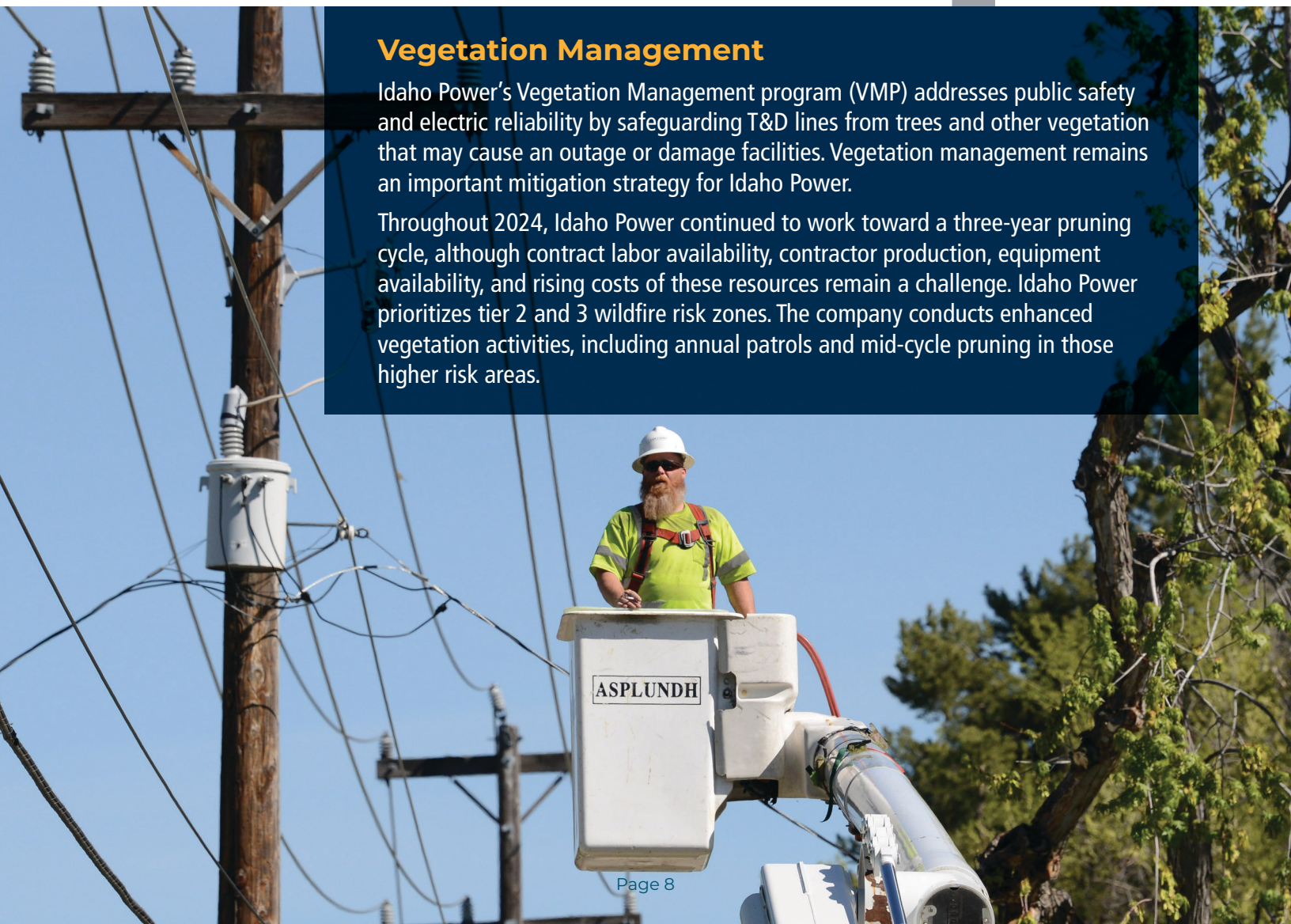
Transmission and Distribution Asset Inspections

To reduce wildfire risk and safely operate the grid, Idaho Power implements and continuously evaluates a set of asset inspection initiatives, including condition-based aerial visual inspections, ground visual inspections, detailed visual inspections (generally using high-resolution photography), thermography inspections, and wood pole inspection and treatment. Fundamental to these efforts is ongoing evaluation and research into industry practices and strategic piloting of emerging technologies and approaches that may enhance existing inspections. In 2024, Idaho Power met or exceeded asset inspection goals established in the WMP.

Vegetation Management

Idaho Power's Vegetation Management program (VMP) addresses public safety and electric reliability by safeguarding T&D lines from trees and other vegetation that may cause an outage or damage facilities. Vegetation management remains an important mitigation strategy for Idaho Power.

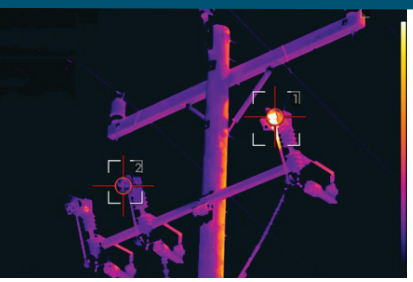
Throughout 2024, Idaho Power continued to work toward a three-year pruning cycle, although contract labor availability, contractor production, equipment availability, and rising costs of these resources remain a challenge. Idaho Power prioritizes tier 2 and 3 wildfire risk zones. The company conducts enhanced vegetation activities, including annual patrols and mid-cycle pruning in those higher risk areas.



WMP Technology and Innovation

Idaho Power identifies and implements new wildfire mitigation technology based on continual evaluation of industry learnings and practices, and technological advancements. The company approaches pilot projects with the goal of learning about implementation complexities, efficacy for risk reduction, and cost analysis of new technologies prior to full integration into the WMP.

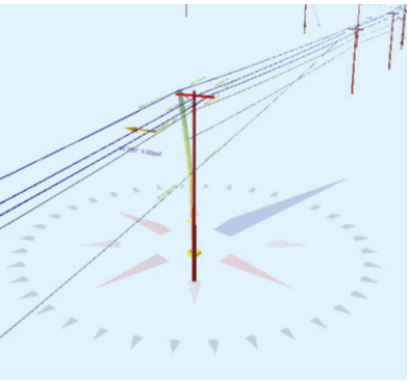
Engagement in industry forums and workgroups like the International Wildfire Risk Mitigation Consortium continue to provide a valuable venue for informal peer-to-peer sharing of emerging technology and lessons learned. In 2024, Idaho Power initiated or continued its evaluation process of several pilot projects due in part to these interactions. Key learnings and results achieved during the pilot periods will determine if the projects become part of Idaho Power's ongoing mitigation strategy.



Thermal Inspections: In certain locations, Idaho Power uses specialized thermal imaging (infrared) equipment that can identify compromised electrical connections and overloaded equipment that may not be apparent through other inspection processes. Over the past two wildfire seasons, this work has detected several anomalies, including four issues in Tier 3 zones that were subsequently repaired. In 2025, Idaho Power plans to continue thermal inspections in strategic locations.

Covered Conductor: As a field trial in 2024, Idaho Power installed approximately one mile of covered conductor, including single-phase and three-phase distribution, in a Tier 3 wildfire risk zone near Pocatello, Idaho. The objective of the trial was to understand the feasibility of construction and maintenance, as well as prepare construction standards, identify required material and equipment, and establish safe and efficient work practices. Throughout 2025, the company will continue to analyze the feasibility of integrating covered conductor more broadly.

Cross-Boundary Fuels Reduction Collaboration: In 2024, Idaho Power participated in the Southern Idaho All Lands Partnership, an effort that focuses on the planning and implementation of hazardous fuel reduction efforts for wildfire-exposed communities in Idaho, including in Ada, Boise, Adams, Valley, and Idaho counties. Through the partnership, Idaho Power worked closely with the United States Forest Service; BLM; Idaho Department of Lands; National Forest Foundation; and other federal, state, and local governments and fire agencies to identify and prioritize projects that protect critical utility infrastructure. This partner-driven work leverages and secures new funding sources to complete fuels reduction projects. The partnership secured a five-year, $20.7M grant award in 2024 from the Natural Resource Conservation Service to support forest and fuels treatments on private lands.



Pole Loading: As part of an ongoing pilot effort, Idaho Power is using modeling software that creates 3-D representations of Idaho Power structures and surroundings in Tier 3 wildfire risk zones to improve our understanding of potential loading constraints on equipment that could lead to a failure. These assessments help identify structural deficiencies based on pole class and the amount of equipment and Joint Use attachments installed. The pilot project is anticipated to run through 2025.

Operations

Field Personnel Practices

Idaho Power's wildfire mitigation strategy includes procedural personnel measures to reduce potential ignition and the spread of wildfires. Idaho Power developed a Wildland Fire Preparedness and Prevention Plan (included as Appendix A to this WMP) to provide guidance to Idaho Power employees and contractors. The plan includes information on fire season tools and equipment required on the job site; daily situational awareness relative to areas where there is a heightened risk of wildfire; expected actions and mechanisms for reducing on-the-job wildfire risk, as well as reporting requirements in the event of an ignition; and training and compliance requirements.

Enhanced Protection Settings (EPS)

Sometimes called sensitive powerline settings, EPS are used to reduce the probability of ignition during fault events on Idaho Power's distribution system. Starting in 2024, the company implemented a two-mode distribution protection strategy during wildfire season:

EPS Mode 1: Auto-reclose turned off. This allows only a single trip, which eliminates traditional re-energizations to test the line, reducing chances of arcing or sparking.

EPS Mode 1 is generally operated as a seasonal setting and is activated when fuel conditions reach a cured state, resulting in increased fire potential. Mode 1 remains in effect until fuel conditions change and there is decreased fire potential as established by the company's Atmospheric Science team.

EPS Mode 2: Auto-recloser turned off and trip settings set to instantaneous lockout. This is a much more sensitive setting that will cause the AR device to lockout prior to most fuses. Mode 2 is designed to minimize the fault energy, further reducing the risk of arcing and sparking.

EPS Mode 2 is enabled in a wildfire risk zone based on zone-specific wind and fire-weather criteria to reduce risk when fire-weather conditions are particularly elevated.

Wildfire Monitoring

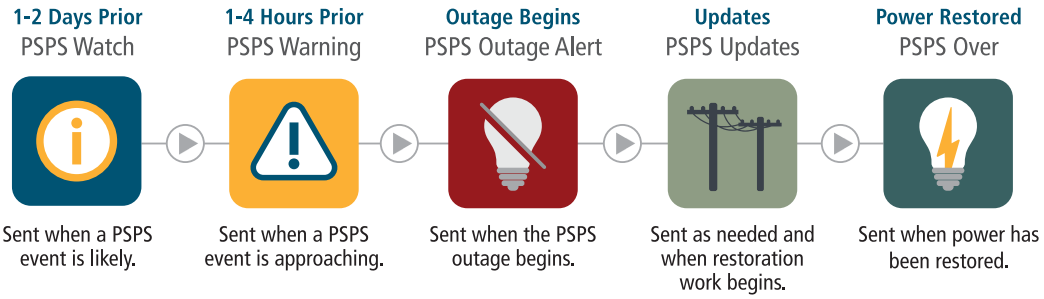
Throughout the summer months, Idaho Power monitors active wildfires and tracks events as they progress. Wildfire tracking informs operational planning and provides insight into areas or infrastructure that could be threatened throughout the fire season. During active wildfire events, Idaho Power coordinates with fire incident command to ensure safety of fire responders, protection of utility infrastructure, and timely power restoration for customers in the event of an outage.

Public Safety Power Shutoff (PSPS)

A PSPS, as used in this WMP, is defined as the proactive de-energization of electric transmission or distribution lines during extreme weather events to reduce the risk of wildfire.

The decision regarding PSPS is based on several dynamic factors, and each weather event is unique. While PSPS remains a last resort tool for Idaho Power, 78% of respondents to an Idaho Power customer survey in October 2024 said they would support the use of PSPS in extreme weather conditions to reduce wildfire risk. **This approval rate is up seven percentage points from 71% the year before.**

Idaho Power understands the complexity of PSPS, including potential impacts on vulnerable populations; the ability for public safety partners to send and receive notifications across power-reliant platforms; and fire suppression efforts that may be reliant on electricity to power wells and water pumps. Idaho Power remains focused on limiting the impact and frequency of future PSPS events and continuously evaluates initiatives under the WMP that could decrease the need for PSPS in the future.



Customer Communications and Outreach

Safety is one of Idaho Power's core values, and it guides our strategy for wildfire-related communication to our customers and the communities we serve. Idaho Power communicates with customers and the public prior to and throughout wildfire season to inform them of steps the company is taking to reduce wildfire risk and ways they can help prevent wildfires and prepare for outages.

Core approaches to communication include social media, radio, customer newsletters, postcards, and voice and text messaging. In 2024, the company conducted over 80 in-person and virtual meetings to engage with customers, counties, fire protection agencies, and other public organizations to discuss and seek feedback on the WMP and the company's PSPS plan. Communication methods and metrics are detailed in Section 10 of the WMP.

80 IN-PERSON MEETINGS AND VIRTUAL

KEY TAKEAWAYS and LESSONS LEARNED from 2024

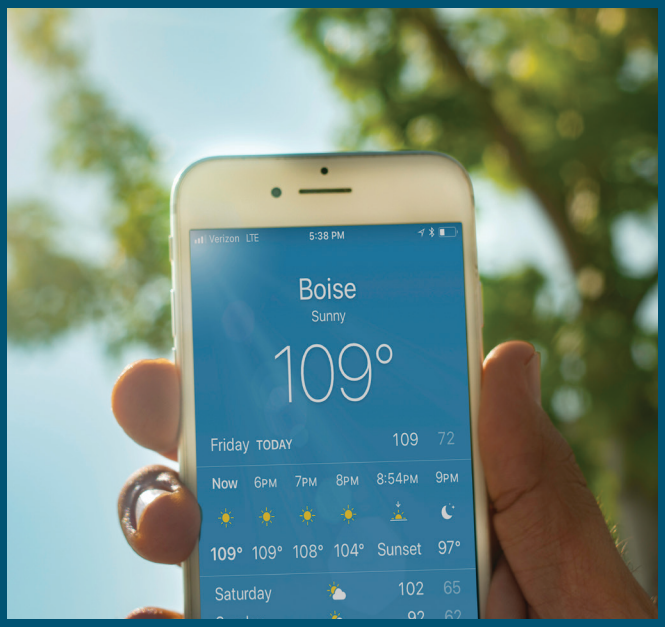
2024 Weather Review

Winter 2023–24 saw above-normal precipitation in the southern half of Idaho Power's service area and below-normal in northern areas. Overall, wet-season (October–May) precipitation was 70 to 90% of normal in the Central Mountains and 110 to 150% of normal in southern Idaho and eastern Oregon. This precipitation distribution resulted in moderate drought conditions near Salmon and robust fine fuel growth across the southern half of the service area going into late spring and early summer.

Slightly below normal temperatures during May quickly transitioned to above normal in June and well above normal in July, August, and September across the service area. The Pacific Northwest saw near-record heat, with the Boise area seeing its second hottest summer (June–August) on record since 1877[1]. Precipitation from May through August was well below normal across the service area, except for near-normal precipitation in southeast Idaho during August.

In September, precipitation was near normal region-wide. These conditions led to rapid drying and curing of fine fuels across the lower elevations by late June and increased fire danger in all areas from July through September. During this period of elevated fire danger, several dry lightning events occurred across the service area, with each event bringing gusty winds and lightning ignitions.

Idaho Power atmospheric scientists performed frequent forecasts to determine a daily FPI value across the company's service area. The warm and dry conditions led to an increase in FPI levels throughout the summer of 2024, with distinct increases in mid-late July, mid-late August, early September, and early-mid October. The 2024 wildfire season saw 38 days in which a red FPI occurred in a wildfire risk zone, compared to 12 days in 2023 and 33 days in 2022.



[1] NOAA National Weather Service. Boise Area Climate - Seasonal Totals. Updated online October 2024. Retrieved on October 21, 2024, from https://www.weather.gov/boi/seasonaltotals?station=BOIThr&season=summer&type=avgt

2024 Wildfire Activity

The National Interagency Fire Center (NIFC) recorded 252 wildfire starts and 1,509,455 acres burned in or near Idaho Power's service area during the 2024 fire season. The number of fire starts was slightly above the 30-year average of 235. The number of acres burned almost doubled the 30-year average of 860,725 acres. The season included several major wildfire events, with nine fires in or near Idaho Power's service area exceeding 50,000 acres and four exceeding 100,000 acres. The largest wildfires occurred in eastern Oregon, western Idaho, and the Central Mountains, with most started by lightning during late July, early August, and early September.

NIFC has developed a National Preparedness Level (PL) system ranging from 1 (lowest) to 5 (highest). The level reflects fuel and weather conditions, fire activity, and resource availability across the country. During 2024, NIFC reached PL 5 for a total of 59 days. This marked the third-highest number of PL 5 days since records began in 1990[2], highlighting the unusually active and persistent fire season.

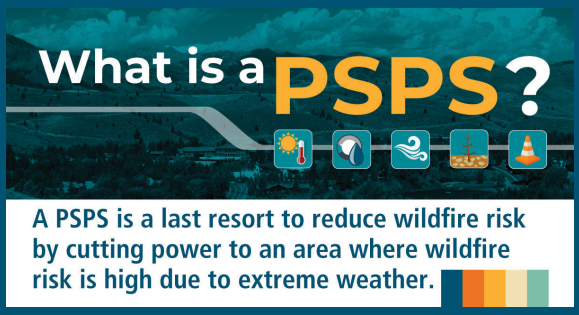
[2] USDA Forest Service Northern Research Station-Understanding the Wildland Urban Interface (1990–2020) (arcgis.com).

Key Learnings

The active wildfire season led to challenging, round-the-clock emergency operations as Idaho Power managed incoming weather systems and active wildfire encroachment on powerline infrastructure. While the number of wildfire starts across Idaho Power's service area was not statistically significant compared to past years, the number of acres burned within five miles of Idaho Power's T&D system due to wildfire was 260% of the 30-year average. In addition to wildfire encroachment monitoring, the Idaho Power team was busy monitoring and assessing fire weather conditions to guide powerline operations. The 2024 fire season saw 12 days with critical fire weather conditions during which the company activated EPS Mode 2 on powerlines in wildfire risk zones.

PSPS — July 24, 2024

Throughout 2024, the PSPS assessment team assembled three times to monitor potential extreme weather events. One event resulted in the company's first-ever PSPS event. In the days leading up to July 24, Idaho Power's Atmospheric Sciences team identified a large-scale weather event that corresponded with very high temperatures, low humidity, and extremely high wind across eastern Oregon and southwestern Idaho.



On Tuesday, July 23, the National Weather Service began issuing a series of weather warnings for the following day, including excessive heat warnings, red flag warnings, and fire weather watches. By Wednesday morning, the weather service issued Severe Thunderstorm warnings that included the possibility of widespread wind gusts of 50 to 70 miles per hour (mph).

Idaho Power activated EPS Mode 2 in 53 wildfire risk zones and continuously tracked the incoming event. At the same time, multiple wildfires were threatening Idaho Power infrastructure, including the Durkee Fire in Oregon[3], which at the time was the largest fire in the country.

After seeing wind speeds and other data points that indicated a need for a PSPS, Idaho Power de-energized lines in two wildfire risk zones in the greater Boise area around 5:40 p.m., affecting approximately 8,845 customers. An additional 33,000 customers experienced unplanned outages from the weather event. Approximately 18,000 of those customers were in areas where EPS Mode 2 was enabled. Once a weather all-clear was issued by Idaho Power's Atmospheric Sciences team, safety patrols and storm damage repairs began. Service was restored for most customers affected by the PSPS event by 3 a.m. the following morning.

The 2024 wildfire season and PSPS event highlighted key learnings and opportunities for future improvement, including the need for:

- **An expanded network of fire-weather stations** that have the capability of near real time data return. Idaho Power's planned efforts for 2025 include the installation of 85 weather stations that will refine forecasts and reduce reliance on field observers to monitor weather and wind conditions.
- **Continued installation of sectionalizing devices capable of remote operations.** The widespread nature of the July 24 weather event emphasized the importance of having remote operation capabilities for devices protecting wildfire risk zones. Sectionalizing devices also limit outage impacts on customers outside wildfire risk zones and speed up the re-energization process during a PSPS event for those impacted by an outage.
- **Evaluating an event management platform capable of supporting high-volume, complex customer communications.** While Idaho Power was successful in communicating with customers before, during, and after the PSPS event, the complexity of the simultaneous events led to the need for detailed and customized messaging. Idaho Power is exploring new tools and capabilities for coordinating, customizing, and tracking pre- and post-outage messages, including strategies to improve the process for establishing an estimated time of restoration (ETR).
- **Wildfire Program Staffing and Capacity.** Idaho Power has historically relied on existing staff to come together for the planning and implementation of the WMP, including support of emergency fire-season operations. In 2024, Idaho Power added dedicated positions to support the WMP with plans to expand team capacity in 2025, including situational awareness, operations, technology advancements, communications and outreach, project management, and regulatory engagement.

[3] What to know: A map of Oregon's Durkee Fire, the largest in the U.S.

2024 Messaging Approach and Community Feedback

Building from learnings in 2023, Idaho Power focused wildfire-related outreach primarily before and during wildfire season. Focusing key communications during a time of year where wildfire is more prominent on people's minds helped to increase the likelihood people would attend meetings and other engagement opportunities. Early communications encourage customers to think about wildfire season, how to prepare for it, their role in preventing wildfires, and steps Idaho Power is taking to keep the grid safe and reduce wildfire risk.

As wildfire season neared, Idaho Power put more emphasis on asking customers to update their contact information, prepare for wildfire or a potential PSPS event, and help prevent wildfires while recreating. In November 2024, Idaho Power sent a customer survey to its Empowered Community seeking feedback on attitudes about utilities and wildfire, including perceptions of risk and support for mitigation measures. The company compared this survey to the October 2023 survey, which the company used to establish a baseline for the effectiveness of our wildfire communication. The following are high-level takeaways from the survey:

78%
would support the use of PSPS in extreme weather conditions to reduce the risk of wildfire.
(Up from 71% in 2023)

63%
recalled hearing or receiving information about PSPS from Idaho Power or through the media.
(Up from 9% in 2023)

43%
recalled getting information about how Idaho Power is working to reduce wildfire risk.
(Up from 27% in 2023)

61%
recalled receiving information about how to prepare for outages
(Up from 34% in 2023)

Regulatory Context

As part of Idaho Power's commitment to deliver safe, reliable, and affordable energy, the company developed the WMP to evaluate and reduce wildfire risk associated with its facilities.

The company's WMP is a living document that will continue to evolve. Idaho Power will continue to review, modify, and expand the WMP to reflect shifts in industry best practices and to ensure the company is following procedures and requirements established by its regulators. As a two-state utility, Idaho Power's regulators in Idaho and Oregon provide meaningful input and recommendations on ways to improve the WMP. A recent history of wildfire-related regulatory activities is provided below by state.

Idaho

Per Idaho Public Utilities Commission (IPUC) Order No. 35717, the company will submit each new WMP to the IPUC and also provide pre- and post-wildfire season briefings.

Oregon

Oregon-specific wildfire requirements are memorialized in Oregon Administrative Rules, Division 300, which specify elements of a utility's WMP.

Additionally, Idaho Power will continue to participate in shaping new WMP guidelines through the Public Utility Commission of Oregon (OPUC) Docket No. UM 2340 and adhere to the new data submissions requirements as specified in OPUC Order No. 24-326.

Idaho Power's Appendix D to the WMP provides Oregon-specific information related to wildfire requirements and recommendations.

1. Introduction

1.1. Background

In recent years, the Western United States has experienced an increase in the frequency and intensity of wildland fires (wildfires). A variety of factors have contributed in varying degrees to this trend, including climate change, increased human encroachment in wildland areas, historical land management practices, and changes in wildland and forest health. Although Idaho has not experienced consequential fires to the same magnitude as some other western states [4], Idaho's wildfire season has grown longer and more intense. Warmer temperatures, reduced snowpack, and earlier snowmelt contribute to drier conditions, extending the period of heightened fire risk. [5]

Idaho's wildfire season is defined by Idaho Code § 38-115 as extending from May 10 through Oct. 20 each year, or as otherwise extended by the Director of the Idaho Department of Lands (IDL). In 2024, the Director issued an extension of the fire season statewide [6] which remained in effect until Nov. 1, 2024[7]. Oregon's wildfire season is designated by the State Forester each year pursuant to Oregon Revised Statute § 477.505 and typically begins in June. Idaho Power's operational practices account for the differences between Idaho and Oregon's wildfire seasons and requirements.

1.2. Idaho Power Profile and Service Area

Idaho Power, headquartered in Boise, Idaho, is an investor-owned utility engaged in the generation, transmission, and distribution of electricity. Idaho Power is regulated by the Federal Energy Regulatory Commission (FERC) and the state regulatory commissions of Idaho and Oregon. Idaho Power serves more than 640,000 customers with a culture of safety first, integrity always, and respect for all.

Idaho Power's 24,000 square mile service area includes approximately 4,745 square miles in Oregon and 19,255 in Idaho (Figure 2). The company serves approximately 20,000 customers in Oregon and 620,000 in Idaho.

[4] Wildland Fire Summaries 2019-2023. Statistics | National Interagency Fire Center (nifc.gov) October 8, 2024

[5] Western Fire Chiefs Association. *Idaho Fire Season: In-Depth Guide | WFCA* Accessed October 8, 2024

[6] Idaho Department of Lands Extends Closed Fire Season - Department of Lands

[7] Idaho Department of Lands Rescinds Extended Closed Fire Season Order - Department of Lands

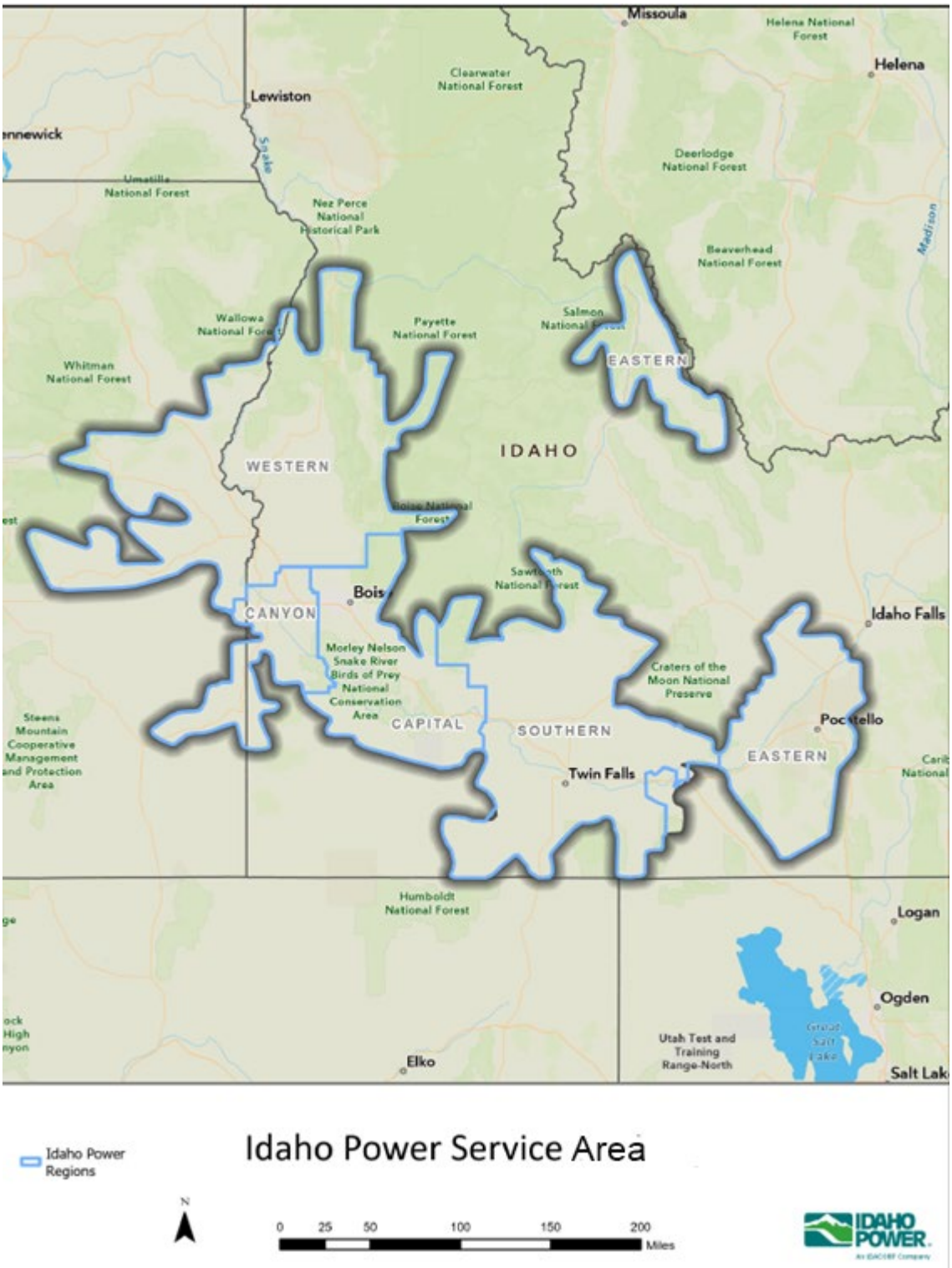


Figure 2
Idaho Power service area

1.3. Asset Overview

Idaho Power delivers electricity to its customers via 310 substations, approximately 4,727 miles of overhead transmission lines, and approximately 19,446 miles of overhead distribution lines. Table 3 summarizes the overhead powerline asset information by state. Additional detailed information on Idaho Power's assets is included in Section 8.

Table 3
Overhead transmission voltage level and approximate line mileage by state*

Asset	TOTAL	IDAHO		OREGON		MONTANA		NEVADA		WYOMING	
	Pole Miles	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%	Pole Miles	%
46 kV Transmission Lines	380	380	100.0%		0.0%						
69 kV Transmission Lines	1077	683	63.0%	344	32.0%	50	5.0%				
115 kV Transmission Lines	3			3	100.0%						
138 kV Transmission Lines	1456	1249	85.0%	141	10.0%			66	5.0%		
161 kV Transmission Lines	84	84	100.0%		0.0%						
230 kV Transmission Lines	1149	930	81.0%	219	19.0%						
345 kV Transmission Lines	475	365	77.0%		0.0%					110	23.0%
500 kV Transmission Lines	103	53	51.0%	50	49.0%						
Total OH Transmission Lines	4727	3744	79.2%	757	16.0%	50	1.1%	66	1.4%	110	2.3%
Total OH Distribution Lines	19,446	17338	89.2%	2108	10.8%						
Total OH Pole Miles	**24,173**	**21,082**	**87.2%**	**2865**	**11.9%**	**50**	**0.2%**	**66**	**0.3%**	**110**	**0.5%**

*Current as of as of Dec. 31, 2023. Line mileage reported includes co-owned assets.

1.4. Objectives of this Wildfire Mitigation Plan

The primary objectives of this WMP are to identify and implement strategies to accomplish the following:

1. 1. Reduce wildfire risk associated with Idaho Power's transmission and distribution (T&D) facilities and associated field operations to protect public safety and reduce risk to utility customers.

2. 2. Improve the resiliency of Idaho Power's T&D system in a wildfire event, independent of the ignition source.

3. 3. Comply with all wildfire mitigation requirements established by its regulators.

Idaho Power's approach to achieving these objectives includes some of the following actions:

- Engage with government and industry entities, the public, and electric utility peers to ensure understanding and commonality of wildfire mitigation plans.
- Utilize a risk-based approach to quantify wildland fire risk that considers wildfire probability and consequence to identify areas of elevated wildfire risk within Idaho Power's service area.
- Create specific and targeted operations and maintenance practices, system hardening programs, vegetation management, and field personnel practices to mitigate wildfire risk.
- Incorporate information regarding current and forecasted weather and field conditions into operational practices to increase situational awareness.
- Employ public safety power shutoff (PSPS) protocols for Idaho Power's service area and transmission corridors.
- Evaluate the performance and effectiveness of strategies identified in this WMP through metrics and monitoring.

1.5. Wildfire Mitigation Plan Maturity

WMP "maturity" is an evolving topic of discussion across the utility industry and academia. The purpose of so-called "maturity models" is to understand the evolution of a utility's WMP based on established standard(s) of progress—most often specific to an individual state regulator's objective. Maturity models and research-based studies on WMP maturity are in various states of evolution.

In 2024, Stanford's Climate and Energy Policy Program published a white paper intended to spotlight the evolution of utility WMP development, including identifying utilities leading the way to reduce risk exposure. Idaho Power's WMP was classified under this study as Tier 1,

corresponding to the study's highest threshold in maturity analysis[8] relative to Federal Emergency Management Agency (FEMA)-established wildfire risk ratings.

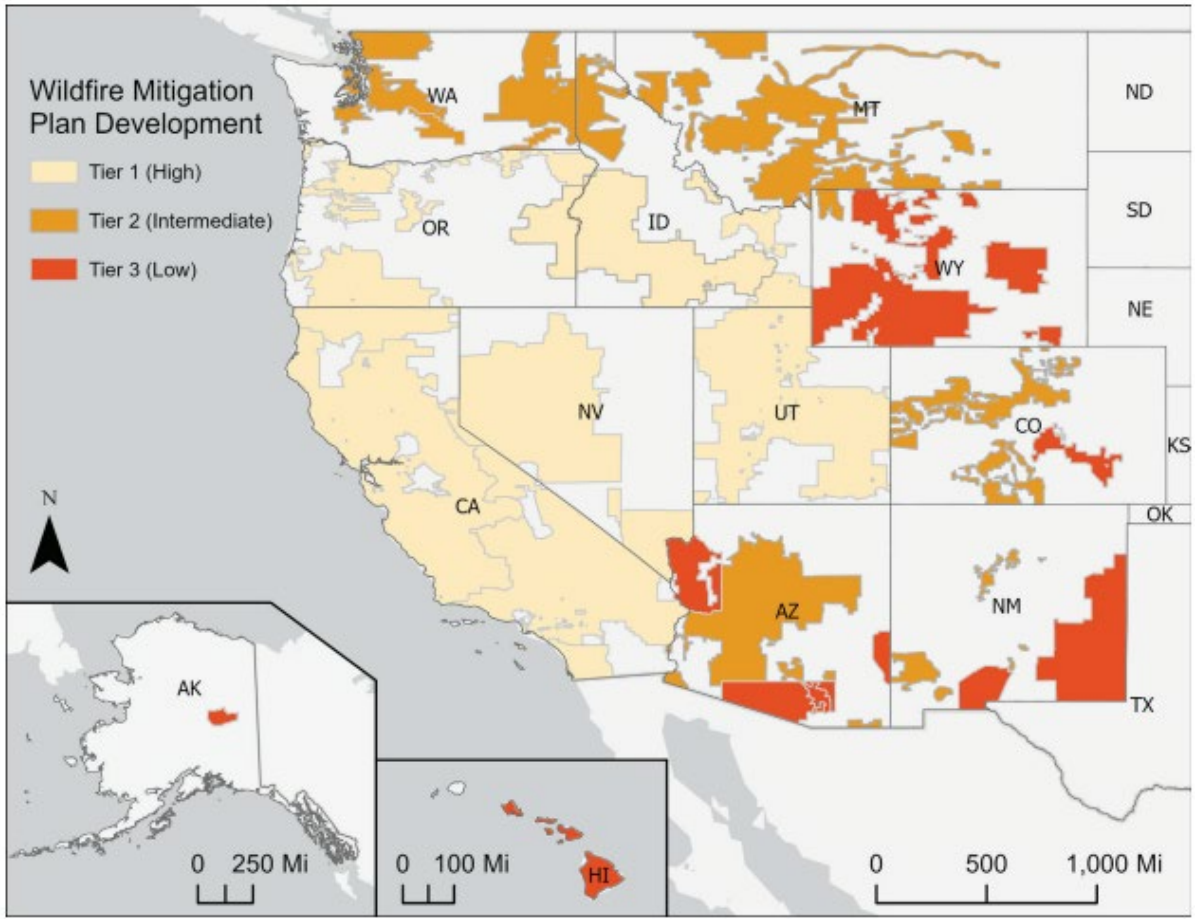


Figure 3
WMP development in western investor-owned electric utilities[9]

Annually, Idaho Power reviews its practices, outcomes, and benchmarks against the practices of other utilities' WMPs. For the past two years, Idaho Power has referenced an established maturity model to aid in its evaluation.

To date, two wildfire risk maturity models exist: the California Public Utilities Commission Wildfire Safety Division (WSD) maturity model and the International Wildfire Risk Mitigation Consortium (IWRMC) Wildfire Risk Mitigation Maturity Model. The WSD model was first

[8] Woods_CEPP_Wildire_White_Paper_FINAL.pdf

[9] Image derived from the Stanford Climate and Energy Policy Program whitepaper Wildfire: Assessing and Quantifying Risk Exposure and Mitigation Across Western Utilities

deployed in 2020, and, in 2022, significantly expanded to beyond 1,000 survey questions that encompass additional areas of focus, such as carbon reduction. The IWRMC Wildfire Risk Mitigation Maturity Model was developed collaboratively among IWRMC member utilities as an enhancement to the WSD maturity model and focuses on 50 key capabilities organized into 10 broad categories (see Figure 4, IWRMC Maturity Model Matrix). The IWRMC model has been, and continues to be, tested among the Consortium's membership to validate findings and identify opportunities for collective and individual utility improvement. As such, Idaho Power considers the IWRMC Maturity Model to be a more appropriate assessment tool over the WSD model for informing the company's approach for assessing programmatic maturity and capabilities.

International Wildfire Risk Mitigation Consortium (IWRMC)
Wildfire Risk Mitigation Maturity Model

Overview of Key Capabilities

Maturity Category	Key Capabilities					
A. Risk assessment and mapping	**1.** Estimation of ignition probability	**2.** Estimation of wildfire consequences	**3.** Estimation of wildfire and pre-emptive power shutoff risk-reduction impact	**4.** Climate/Weather scenario modeling and sensitivities	**5.** Risk maps and simulation algorithms	
B. Situational awareness and forecasting	**6.** Weather variables utilized	**7.** Weather data resolution	**8.** Weather forecasting	**9.** Weather vulnerability and damage prediction	**10.** Wildfire detection	
C. Grid design and system hardening	**11.** Prioritization and justification of wildfire risk mitigation grid design/ system hardening initiatives	**12.** Grid design for minimizing ignition risk	**13.** Grid design for resiliency and minimizing pre-emptive power shutoffs (if applicable)	**14.** Risk-based grid hardening and cost efficiency	**15.** Evaluation and Deployment of Technology & Innovations	
D. Asset management and inspections	**16.** Asset inventory and condition assessments	**17.** Asset inspection cycle	**18.** Asset inspections & diagnostic effectiveness	**19.** Asset maintenance and repair efficiency, effectiveness, and compliance	**20.** QA / QC for asset management	
E. Vegetation management and inspections	**21.** Vegetation inventory and condition assessment data	**22.** Vegetation analytics & diagnostic effectiveness	**23.** Vegetation grow-in inspection and trimming / treatment process & cycle times	**24.** Vegetation fall-in / hazard inspection and mitigation process & cycle times	**25.** Fuel Load Management	**26.** QA / QC for vegetation management
F. Grid operations and protocols	**27.** Protective equipment and device settings	**28.** Incorporating ignition risk factors in grid control	**29.** Pre-emptive power shutoff operating model and consequence mitigation (if applicable)	**30.** Pre-emptive power shutoff initiation protocols (if applicable)	**31.** Pre-emptive power shutoff re-energization protocols (if applicable)	**32.** Ignition prevention and suppression
G. Data governance	**33.** Data quality and comprehensiveness	**34.** Data management	**35.** Data democratization & literacy	**36.** Data & cyber security	**37.** Analytic solutions	
H. Resource allocation methodology	**38.** Benefit-cost assessment and scenario analysis	**39.** Portfolio-wide initiative allocation methodology	**40.** Portfolio-wide innovation in new wildfire initiatives	**41.** Wildfire Organization design, resourcing, and skills		
I. Emergency planning and preparedness	**42.** Wildfire plan consistency with overall disaster / emergency plan	**43.** Plan to restore service after wildfire related outage	**44.** Emergency community engagement during and after wildfire	**45.** Protocols in place to learn from wildfire events	**46.** Processes for continuous improvement after wildfire and pre-emptive power shutoffs (if applicable)	
J. Stakeholder cooperation and community engagement	**47.** Data and practices sharing, and cooperation with external stakeholders	**48.** Engagement with communities and stakeholders on wildfire mitigation planning and mitigation initiatives	**49.** Engagement and communication with disadvantaged populations	**50.** Collaboration with emergency response agencies		

Figure 4
IWRMC Maturity Model Matrix

In 2024, Idaho Power completed the IWRMC maturity model, and analyzed and benchmarked data to inform maturation focus. Idaho Power identified four categories for maturation over the next three years. Categories, capabilities, approach for maturation, and associated implementation timelines are included in Table 4 below.

Table 4
Idaho Power IWRMC maturation approach

IMRMC Category	Capability	High-Level Approach	Timeline
Risk Mapping and Simulation	Estimation of Ignition Probability (1) Estimation of wildfire and pre-emptive power shutoff risk-reduction (3)	Incorporation of Technosylva Wildfire Analyst software, including Fire Risk and Fire Sim	2024–2026
Grid Design and System Hardening	Prioritization and justification of wildfire risk mitigation grid design/system hardening (11) Risk based grid hardening and cost efficiency (14) Evaluation & deployment of technology and innovations (15)	Incorporation of Technosylva Fire Sight Data Analysis and Weather Research and Forecast model to aid in programmatic decision making	2024–2026
Grid Operations and Protocols	PSPS protocols, including for re-energization (31)	Cross-departmental Initiative to review and assess all PSPS protocols	2024–2025
Resource Allocation and Methodology	Wildfire organization design, resourcing, and skills (41)	Benchmarking of utility wildfire organizational structures and skill sets. Expand the Idaho Power wildfire team as needed.	2024–2025

2. Government, Industry, and Peer Utility Engagement

2.1. Objective

Idaho Power recognizes the importance of engaging with various levels of government—federal, Idaho and Oregon State governments, and local governments—as an integral part of mitigating wildfire risk. Idaho Power also recognizes the importance of engagement and outreach with respect to potential future public safety power shutoff (PSPS) events to minimize customer impact.

Idaho Power's WMP and outage preparedness strategy includes specific activities to engage with key stakeholders to share information, gain feedback, and incorporate lessons learned. Peer utility engagement ensures the company's efforts are informed by the best practices of its peers in Idaho and Oregon.

2.2. Government Engagement

Much of Idaho Power's service area extends over forest and rangeland managed by the Bureau of Land Management (BLM), U.S. Forest Service, and state agencies such as Idaho Department of Lands and Oregon Department of Forestry. Prior to the start of fire season, Idaho Power offers to meet with state and federal land-management agencies in Idaho and Oregon to review the company's approach for wildfire mitigation and discuss wildfire season operations. Throughout the year, Idaho Power continues to engage with state and federal agencies to share information and to identify and work toward activities that are mutually beneficial.

For example, in 2024 Idaho Power participated in a wildfire roundtable hosted by Idaho Governor Brad Little and Lt. Governor Scott Bedke. From this effort, the Governor's Office produced a report outlining 10 Idaho-specific priorities to reduce the impacts of wildfire.[10] The report includes recommendations and directives intended for state agency directors on issues such as liability reform for utilities and insurers, wildfire mitigation strategies, and statewide communications. The report includes a directive for the Idaho Department of Lands, Idaho Office of Energy and Mineral Resources, Office of Emergency Management, and Idaho Transportation Department to lead an effort to establish a state-wide interoperability system for coordinating wildland fire detection cameras. The directive is intended to engage federal partners, including the BLM and U.S. Forest Service, to utilize lookout stations that could be prime locations to install and monitor additional cameras. For the past two years, Idaho Power has facilitated an effort with Idaho Department of Lands, the BLM, and the U.S. Forest Service on the establishment of a wildfire detection camera network. These early coordination efforts

[10] Idaho Wildfire Report Recommendations August 2024

are laying the groundwork for what is intended to become a broader, state-facilitated coordination effort moving forward.

Additionally, Idaho Power continues to be a member of the Southwest Idaho All-Lands Partnership. The Partnership consists of representatives from federal and state agencies, counties, fire protection districts, and non-profits. The group's mission is to reduce catastrophic wildfire risk by pooling expertise and funding and creating a shared prioritization process for targeting fuel reduction treatments across federal, state, and private forestlands in southern Idaho.

Year-round, Idaho Power actively engages with both the Idaho Public Utilities Commission (IPUC) and the Public Utility Commission of Oregon (OPUC) with respect to wildfire mitigation activities. Idaho Power files its WMP annually with IPUC. In Oregon, the company is required to submit an updated WMP by the end of each calendar year, which is then subject to a 180-day review and approval process by the OPUC. Idaho Power continues to participate in the OPUC's Oregon Wildfire and Electric Collaborative (OWEC) and ongoing rulemaking efforts.

2.3. Industry and Peer Utility Engagement

The first iterations of Idaho Power's WMP relied on learnings and processes developed by several California utilities, with Idaho-specific modifications that account for the unique qualities of Idaho Power's service area and risk profile. Idaho Power continues to engage with utilities, including San Diego Gas and Electric (SDG&E), Southern California Edison, Pacific Gas and Electric (PG&E), Sacramento Municipal Utility District, Liberty Electric, and PacifiCorp to advance Idaho Power's WMP and stay up-to-date on evolving practices.

For example, in April of 2024, Idaho Power's wildfire team and members of executive leadership traveled to San Diego to attend SDG&E's 2024 PSPS tabletop exercise with public safety partners. This provided an opportunity to observe SDG&E's approach to PSPS training and engagement. Learnings from this event were and continue to be incorporated into Idaho Power's PSPS program. In May of 2024, members of Idaho Power's Wildfire Mitigation team attended an inaugural convening of PG&E's Near-Term, Risk-Informed Wildfire Mitigation Strategies for Utilities conference. More than 150 attendees from utilities

Figure 5
Discussion of Enhanced Protection Settings (EPS) with peer utilities at PG&E

across the U.S. came together in California for two days of panel-style discussions on topics ranging from wildfire mitigation technology, customer engagement, PSPS protocols, and fire-weather forecasting. During this conference, Idaho Power was introduced to Watch Duty, an app-based platform that consolidates real-time, fire-weather information with wildfire detection. Following the conference, Idaho Power integrated this technology into the company's processes for detecting new wildfire starts.

Idaho Power also regularly collaborates with peer utilities from the Pacific Northwest and Rocky Mountain Region, including but not limited to Avista Utilities, Portland General Electric (PGE), Rocky Mountain Power, Pacific Power, Chelan County Public Utility District, Puget Sound Energy, Excel Energy, NV Energy, Bonneville Power Administration (BPA), and Northwestern Energy. Prior to the start of the 2024 Wildfire Season, Idaho Power hosted a Pacific Northwest utility forum in Boise that centered on the sharing of WMP best practices, common challenges, and innovative solutions for minimizing wildfire risk.

Additionally, Idaho Power is an active member of trade-based organizations that offer wildfire-specific forums and discussions, including the International Wildfire Risk Mitigation Consortium (IWRMC), Edison Electric Institute (EEI), and Western Energy Institute (WEI). These forums are integral for sharing of information and best practices. For example, the IWRMC was designed specifically as an industry-sponsored collaborative forum that facilitates the sharing of wildfire risk mitigation insights and innovations from across the globe. The program is led by a Utility Executive Steering Group, whose members work specifically on wildfire/bushfire issues in Australia and the western U.S. Idaho Power's engagements with IWRMC are focused on operations and protocols, asset management, vegetation management, and risk management with additional participation from Idaho Power's vice president (VP) of Planning, Engineering, and Construction in IWRMC's Executive Strategy Forums.

Throughout 2024, the wildfire mitigation team also participated in multiple workshops and conferences with EEI and WEI that provided insights into emerging technologies and advancements for WMPs. Additionally, Idaho Power's CEO and president is an active member of the EEI Electricity Subsector Coordinating Council Wildfire Working Group. This working group has been partnering with the U.S. Department of Energy (DOE) and other government agencies to collectively minimize wildfire threats and potential impacts. In 2025, Idaho Power is hosting WEI's annual Wildfire Mitigation Workshop in Boise.

Idaho Power views its ongoing collaboration with its peer utilities as critical for understanding and ensuring commonality of wildfire mitigation plans, while accounting for the variation in each utility's unique service area.

2024 Industry, Fire Expert, and Peer Utility Engagement

Idaho Power continues to engage with academia, industry groups, wildfire experts and peers, and peer utilities to gain knowledge of new mitigation activities, industry best practices, and technology to reduce wildfire risk. The following provides an overview of Idaho Power's 2024 activities:

Academia

Boise State Hazard and Climate Resilience Institute (HCRI)—Participant in two HCRI-sponsored networking events at Boise State University.

Stanford Climate and Energy Policy Program (CEPP) —Participated in CEPP's Wildfire Risk and Mitigation Across Western Utilities Project and e-attended presentation for the CEPP on assessing and quantifying risk exposure and mitigation across western utilities.

USDA Forest Service Northern Research Station (NRS), the Community Wildfire Planning Center (CWPC), Portland State University (PSU) and the University of Colorado Denver—Participated in the interviews for the "Fueling Adaptation" study, which is examining how communities in areas of high wildfire risk are adapting to mitigate that risk, and how increased federal investments made by the U.S. Department of Agriculture (USDA) Forest Service's Wildfire Crisis Strategy may contribute to such efforts.

Industry Advancement and Technology

ANSI C119 Connector Committee 2024—Attended the C119.8 Meeting about Standards Development on MV Piercing connector for Covered Conductor.

California Utility Forecaster Meeting (CUFM) – Held at San Diego Gas & Electric, a meeting of western U.S. utilities and government weather and fire agencies to share strategies, technologies, and lessons learned in forecasting fire weather and risk. Idaho Power gave a presentation on our FPI forecasting process and met with other utility meteorologists about how they forecast and communicate fire risk.

Clarion Webinar on Covered Conductor—Attended a virtual webinar on covered conductor systems as a wildfire mitigation tool.

Distributech 2024—Attended conference and specific educational sessions on wildfire mitigation including PG&E's Reliability Intervention Analytics and Portland General's journey to an ADMS.

International Wildfire Risk Mitigation Consortium (IWRMC)—Idaho Power actively participates in monthly workgroup forums for operations and protocols, asset management, vegetation management, and risk management.

IEEE Expo, 2024—Attended the Institute of Electrical and Electronic Engineers (IEEE) Expo to research material and technology related to wildfire mitigation strategies, including line monitors, covered conductor stripping tools, covered conductor splicing covers (heat shrink/cold shrink), and down conductor sensing technology.

2024 Industry, Fire Expert, and Peer Utility Engagement (Continued)

Madison Underground Distribution System Training (University of Wisconsin) 2024— Attended training that covered high-level cost comparisons for overhead to underground line conversions, and applicable codes and standards that govern underground distribution installations, cable, connector and equipment manufacturing considerations, and overvoltage and current protections.

SKYDIO Ascend24 Conference—Idaho Power's UAS (drone) team lead participated in a panel presentation highlighting how Idaho Power is using drones as part of the company's wildfire mitigation plan.

Trees & Utilities Conference—Attended presentations specifically on technologies that could be used to identify specific areas of potential Tree-to-Powerline contact.

Western Energy Institute (WEI)

- WEI Operations Conference, Oakland, CA—attended conference on distribution operations including operations in wildfire risk areas.
- WEI Wildfire Planning and Mitigation, Oakland, CA —Attended a two-day conference focused on wildfire-specific mitigation activities and strategies.
- Overhead and Underground Electric Distribution Conference 2024—Attended the Forum, Information, and Best Practices Sharing discussions on WMP, and Pole Fire Mitigation Strategy presentation.

Western Undergrounding Committee—Attended forum and participated in information sharing sessions on WMP approaches by Southern Cal Edison, Pacific Gas and Electric, Idaho Power, and San Diego Gas and Electric.

Technology—Idaho Power maintains and regularly updates our five-year WMP technology roadmap. This roadmap provides a framework for ongoing evaluation of existing and new technologies and informs the process for the incorporation of new innovations into our WMP pilot project cycle. As part of our technology roadmap process, Idaho Power frequently meets with a variety of wildfire technology vendors. Non-exhaustive examples are included below:

Eaton: Ongoing work with Eaton to pilot the Form7 recloser control HiZ module.

ENSTO: Discussed covered conductor dead-end and piercing connectors.

Fire Dawg: Hosted an on-site demonstration of mobile community resource centers and additional services offered by the vendor.

Gridware: Met with Gridware to discuss their fault detection system that measures a variety of mechanical forces on primary distribution lines, which can detect fault conditions or other hazards.

2024 Industry, Fire Expert, and Peer Utility Engagement (Continued)

Kaddas: In a series of meetings throughout 2024 to discuss covered conductor.

Logic 20/20: Met with Logic 20/20 to discuss their risk modeling system and how it could apply to our WMP.

Sentient Line Monitors: On-site meeting to discuss wildfire mitigation use cases using MM3ai line sensors and ample analytics.

Siemens: Discussed Fuse Saver and other protection technology.

Watch Duty: Discussion of fire tracking, notification capabilities, and use cases relative to the utility sector.

Peer-to-Peer Utility Engagements

Avista—Idaho Power's wildfire team met multiple times with the Avista wildfire team throughout 2024 for focused discussions on PSPS operations and protocols.

CPUC 2024 Post-Season/Pre-Season Public Briefings on Utility Public Safety Power Shutoffs—Attended a recap of PSPS activities in the California as presented by the investor-owned utilities (IOU) to the PUC.

Northwestern—Idaho Power's wildfire team collaborated with Northwestern multiple times throughout 2024 including for wildfire detection cameras and PSPS protocols.

PacifiCorp

- One-on-one meeting to discuss PacifiCorp's EPS and technologies used for wildfire risk mitigation.
- Idaho Power's wildfire team engages monthly with PacifiCorp's wildfire team to discuss WMP approach and alignment across Idaho Power's Oregon and Idaho service area.

Pacific NW Utility Wildfire Group—Idaho Power hosted a spring meeting in Boise with attendance from utilities across the Pacific Northwest and Rocky Mountain regions. Topics shared included details of Idaho Power's WMP and PSPS plan and collective discussion on technology and innovative approaches to mitigation.

Portland General Electric—Idaho Power's wildfire team engages monthly with Portland General's wildfire team to discuss WMP approaches and alignment across Idaho Power's Oregon service area.

Pacific Gas and Electric (PG&E)

- Members of the PG&E team came to IPC headquarters in Boise to discuss wildfire mitigation specific topics, including ignition tracking, enhanced vegetation management, metrics, enhanced protection safety settings (EPSS) programs, and situational awareness strategies.

2024 Industry, Fire Expert, and Peer Utility Engagement (Continued)

- **PG&E + Palantir**: AIP Now for Public Safety Power Shutoffs. Online virtual meeting hosted by PG&E to highlight work that Palantir has done for them, showing many of the displays and actions that Palantir could employee for IPC if engaged.

- **Maui Fire Meteorology** –Idaho Power participated in a presentation on meteorologic and fuel conditions leading up to and during the Maui Fire.

- PG&E and IPC Wildfire and Meteorology teams met to discuss weather research and forecast modeling, including operations and incorporation of Technosylva in their processes.

- One-on-one meeting to discuss PG&E's EPSS and technologies used for wildfire risk mitigation.

Public Service of New Mexico—Meeting with leadership to discuss and provide details on Idaho Power's WMP and learnings.

Rocky Mountain Power (RMP) —Idaho Power's leadership met with RMP to discuss approaches managing wildfire encroachment.

San Diego Gas and Electric (SDG&E):

- **2024 Public Safety Power Shutoff Tabletop Exercise with Public Safety Partners**—Idaho Power attended a hybrid event held at SDG&E that went through the PSPS process discussing processes and actions during a PSPS as well as presentations from vendors.
- **SRP**—One-on-one meeting with SDG&E's Electric System Protection engineers to discuss sensitive relay profile (SRP) settings, and technologies used for wildfire risk mitigation.

Xcel Energy Public Safety Power Shutoff Criteria Workshop—Participated in a PSPS Criteria workshop that allowed participants (subject-matter experts [SME]) to discuss threshold criteria and refinement for PSPS decisions. The workshop was led by the Xcel wildfire mitigation team designed to improve the resilience of Xcel Energy and booster their PSPS program.

2024 Industry, Fire Expert, and Peer Utility Engagement (Continued)

Wildfire Mitigation Engagements and Learning

- **Ada County Fire Adapted Communities (ADAFAC) Workgroup**—Idaho Power is an active partner of ADAFAC, which supports wildfire education and community preparedness.
- **Bermuda Captive Insurance Companies**— Presentations on Idaho Power's approach for wildfire mitigation.
- **Boise County Fire Chiefs**—Presentation on Idaho Power's WMP and PSPS program.
- **Bureau of Land Management**—WMP discussion and pre-fire season preparedness conversations with Oregon and Idaho BLM fire leadership.
- **Environmental Idaho Series—**Attended an in-person panel presentation on the 100-year trend wildfire has taken in Idaho. Panelists included experts from the National Interagency Fire Center (NIFC) and Idaho Climate Literacy Education Engagement and Research Group (i-CLEER) at Boise State University.
- **Firewise Events**—Participated in two Firewise events in Boise including Firewise Day at the Botanical Garden and the Exploring Wildly Series hosted by the City of Boise that included a Firewise Garden tour and panel discussion.
- **FEMA Incident Command System Training**—IPC staff participated in both the ICS-100 and ICS-200 online courses from FEMA and received certificates of completion.
- **Idaho Power Energy Academy**—WMP discussion with community leaders and businesses in Ada County.
- **Idaho Department of Health**—Presentation on Idaho Power's WMP and PSPS program.
- **Idaho Society of Healthcare Engineering**—Presentation on Idaho Power's WMP and PSPS program.
- **7th International Fire Behavior and Fuels Conference—**Held in Boise, a forum where past fire management experience and lessons learned are documented; current work showcased; and emerging research, innovation, and techniques on fire management shared, towards developing integrated solutions to these challenges. Idaho Power presented on partnership-based fuels reduction efforts.
- **LANDFIRE office hour sessions—**Attended several webinar sessions focused on the methodology used throughout the LANDFIRE 2023 update processing, including efforts to improve vegetation classification accuracy and better understand the relationship between fire simulation modeling and agricultural–urban interface environments.

2024 Industry, Fire Expert, and Peer Utility Engagement (Continued)

- **Moody's Insurance**—Presentation on Idaho Power's approach for wildfire mitigation.
- **National Interagency Fire Center (NIFC)**—Continue to work with NIFC staff to learn more about the Quantitative Wildfire Risk Assessment (QWRA) and Interagency Fuel Treatment Decision Support System (IFTDSS) and assess the use of this tool in the in the utility setting.
- **Oregon Wildfire Detection Camera Interoperability Committee**—Evaluating the siting/logistics, technology, governance, and financial needs associated with the growing network of wildfire detection camera systems in Oregon.
- **S&P Global**—Presentation on Idaho Power's approach for wildfire mitigation.
- **U..S. Forest Service (USFS) Leadership Engagement**—Met with USFS leadership, including the Forest Service chief and regional forester for R4 to provide an overview of the company's WMP and initiate conversation on collective opportunities for wildfire risk mitigation work within and adjacent to Idaho Power's utility rights of way.

3. Quantifying Wildland Fire Risk

3.1. Objective

Idaho Power's approach to quantifying wildland fire risk includes qualitative and quantitative strategies to identify geographic areas of elevated wildfire risk if a wildfire ignites near a power line. Mitigation actions and programs are prioritized in those areas identified as elevated wildfire risk areas.

3.2. Identifying Areas of Elevated Wildfire Risk

Idaho Power works with an external consultant that specializes in assessing and quantifying the threat of wildfire through a risk-based methodology that leverages weather modeling, wildfire spread modeling, and Monte Carlo simulation. This methodology is commonly used across the industry with other utilities in California, Oregon, Idaho, Nevada, and Utah utilizing a similar approach to identify and quantify wildfire risk. The California Public Utilities Commission (CPUC) utilized the same consultant as Idaho Power did in the original development of the CPUC Fire Threat Map.

This wildfire risk-based methodology is consistent with conventional definitions of risk, which is taken as an event's probability multiplied by its potential negative consequences or impacts should that event occur. For Idaho Power's wildfire risk assessment, this formula is shown in Figure 6.

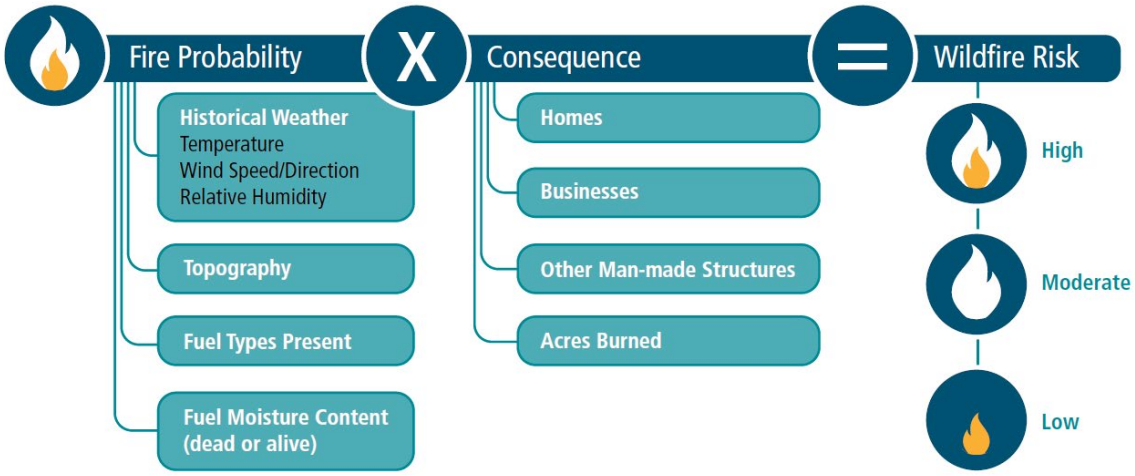


Figure 6
Wildfire risk-based methodology

Each component is defined as follows:

- **Fire Probability**. Fire volume (i.e., spatial integral of fire area and flame length) is used as Fire Probability because rapidly spreading fires are more likely to escape initial containment efforts and become extended fires than slowly developing fires. Data inputs used in the fire spread model to determine the fire volume (Fire Probability) include historical weather, topography, fuel type, and fuel moisture content.

- **Consequence**. Estimation of the fire's impact on structures (i.e., homes, businesses, other man-made structures) and acres burned.

- **Wildfire Risk**. Fire Probability multiplied by the Consequence. The highest Wildfire Risk areas are those where both the Fire Probability and Consequence are elevated. Conversely, combinations of low Fire Probability and elevated Consequence, or elevated Fire Probability and low Consequence typically indicate lower Wildfire Risk.

3.2.1. Wildfire Risk Modeling Process

The wildfire risk modeling process incorporated the following major steps:

1. A 12-year (2011–2022) fire weather climatology was developed utilizing the Weather Research and Forecasting (WRF) model to recreate historical days of fire weather significance across Idaho Power's service area. This analysis generated high-resolution hourly gridded fields of relative humidity, temperature, dead fuel moisture, and wind speed/direction that was used as input to a Monte Carlo-based fire modeling analysis.

2. Estimates of seasonal variation in live fuel moisture across Idaho Power's service area were developed. This was accomplished by analyzing historical fuel measurements and/or weather station observations. This step was necessary because live fuel moisture data is needed for fire spread modeling, but the WRF weather model does not provide live fuel moistures.

3. The federal LANDFIRE program was utilized to provide high-resolution (approximately 100 feet) fuel rasters for use in fire spread modeling.[11]

4. The data developed above (WRF climatology, live fuel moisture, and LANDFIRE data) was used to drive a Monte Carlo[12] fire spread modeling analysis. This Monte Carlo

[11] Lautenberger, C.W., "Mapping areas at elevated risk of large-scale structure loss using Monte Carlo simulation and wildland fire modeling," *Fire Safety Journal* **91**: 768-775 (2017).

[12] Ibid.

simulation was accomplished by randomly selecting an ignition location and a randomly selected day from the fire weather climatology developed in step 1 above. Ignition locations were limited in the model to be within a 240-meter buffer surrounding Idaho Power's overhead transmission and distribution (T&D) lines (i.e., 120 meters on either side). The model used equal ignition probability for all overhead distribution and transmission asset types.[13] Urbanized areas having underground circuitry were not included in the model due to a low probability of wildfire associated with underground electrical equipment. For each combination of ignition location and time of ignition, fire progression was then modeled for 12 hours. For each modeled fire, potential fire impacts to structures were quantified using structural location data. This was repeated across Idaho Power's service area for millions of combinations of ignition location and time of ignition.

5. The Monte Carlo results were processed, and GIS-based data depicting fine grained wildfire risk was developed. This risk was then visually depicted on GIS-based wildfire risk maps.

3.2.2. Establishing Wildfire Risk Zones

Based on the previously described modeling, draft risk tiers are generated algorithmically[14] by an automated process. Tiers are established which, if exceeded, would classify an area as Tier 2 (elevated risk) or Tier 3 (higher risk). This was accomplished by manually setting threshold values at naturally occurring breaks and is a similar approach to that taken by the CPUC in developing a state wildfire risk map. Consequently, the resulting risk tiers reflect risk relative to Idaho Power's service area only and not absolute risk. Idaho Power color-codes the tiers—yellow for Tier 2 and red for Tier 3 wildfire risk zones.

Iterative review of wildfire risk across the service area remains integral to the maturity of Idaho Power's risk modeling methodology and is consistent with the ISO 31000 risk management process that informs Idaho Power's WMP. Annual risk area adjustments are used to account for unique factors that may increase or decrease risk due to changes that have occurred overtime, such as increased development in a wildland urban interface or recent large-scale fires that alter vegetation composition. In addition to the quantitative assessment provided by the wildfire risk model, Idaho Power simultaneously utilizes a qualitative assessment process to account for factors not incorporated into the wildfire risk modeling, detailed below in Figure 7.

[13] Transmission lines jointly owned by Idaho Power and PacifiCorp were included in the analysis. Furthermore, the proposed Boardman to Hemingway (B2H) 500 kilovolt (kV) line route was also included in this analysis.

[14] Ibid.

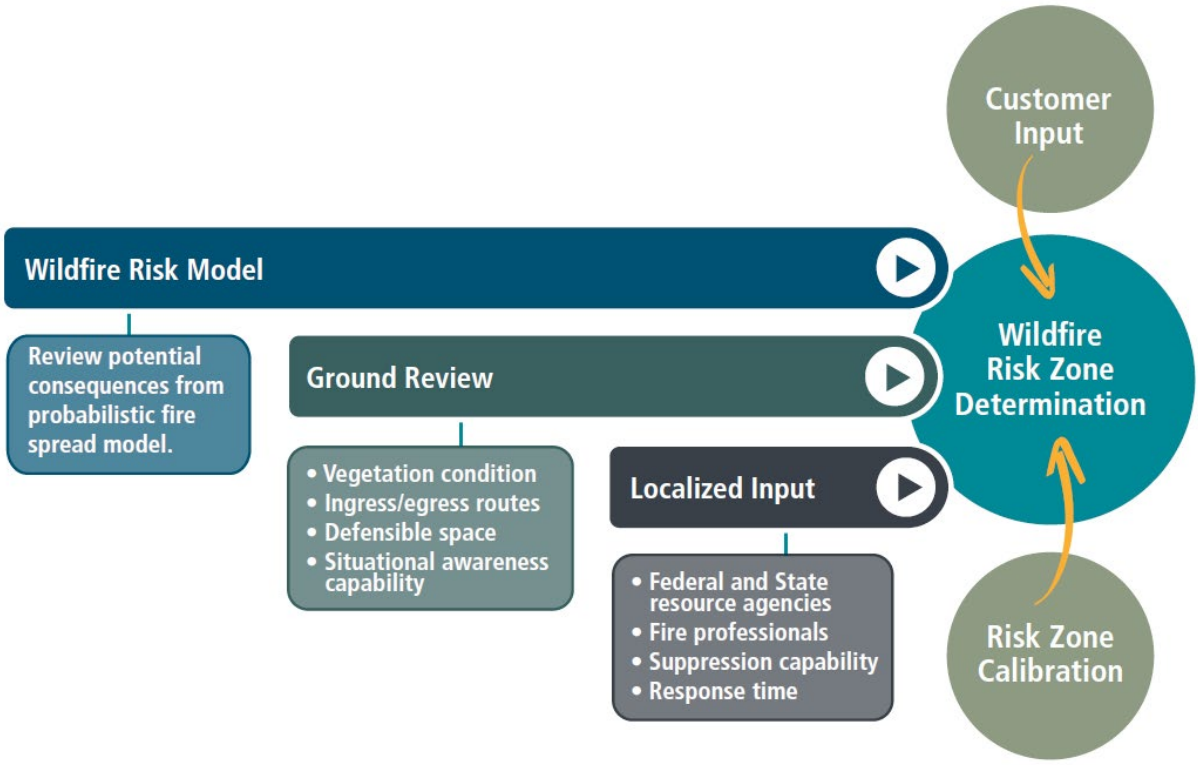


Figure 7
Risk zone evaluation and determination process

Incorporating Local Feedback into Risk Zone Establishment

Throughout the year, Idaho Power routinely attends Local Emergency Planning Committees (LEPC). Among other topics, this forum provides a platform to receive valuable feedback from county-level public safety partners on the WMP, including risk areas, mitigation approaches, outage preparedness, and emergency planning. Idaho Power also periodically meets one-on-one with local fire departments and rural fire protection districts in Oregon and Idaho, and state and federal resource managers, including Idaho Department of Lands, Oregon Department of Forestry, Bureau of Land Management (BLM) district-level leadership in Oregon and Idaho, and U.S. Forest Service (USFS) forest-level leadership in Idaho to review Idaho Power's risk modeling process and gain feedback on localized areas relative to wildfire risk. The feedback gained from these one-on-one meetings supports the understanding of suppression capabilities, ingress/egress routes, and localized factors that may influence fire regime.

Idaho Power's process for incorporating customer feedback into the WMP utilizes a variety of approaches, including public workshops. Section 10 details Idaho Power's approach to customer outreach and feedback relative to the WMP.

Wildfire Risk Zone Calibration with Peer Utilities

Idaho Power routinely engages with peer utilities and forums to benchmark and continually evaluate the company's WMP activities and initiatives, including with the approach to risk modeling. In 2024, Idaho Power participated in conversations with Rocky Mountain Power, Portland General Electric, PacifiCorp, Bonneville Power Administration (BPA), and Avista to better understand each utility's approach to risk assessment and risk zone designation. Since joining the International Wildfire Risk Management Consortium (IWRMC) in 2023, Idaho Power has also participated in a subgroup within the forum focused on risk-based topics, including risk assessments, mapping, and modeling. Idaho Power defines consequence as a fire's impact on structures and acres burned, thus the relative importance of these two factors is primary to the company's determination of risk zones. Highly valued resources and assets may be defined or weighted differently depending on the goals associated with wildfire modeling and as such risk profiles can vary.[15] Idaho Power will continue to work with peer utilities to inform collective understanding and decision making around wildfire risk modeling with the goal of continually improving Idaho Power's approach.

3.3. Wildfire Risk Zones

As detailed above, Idaho Power's wildfire risk zones reflect risk relative to Idaho Power's service area only and not absolute risk. These zones guide our wildfire season operations and help inform our approach to wildfire mitigation.

To aid in customer and public understanding, Idaho Power color-codes the tiers—yellow for Tier 2 and red for Tier 3. The full risk zone map can be viewed in detail on Idaho Power's website, and individual addresses can be entered on the map to determine proximity to identified risk zones. For 2025, Idaho Power made four zone changes within the Idaho portion of the service area (Table 5 and figures 8–9). Table 6 provides a breakdown of pole miles in risk zones system-side and by state.

Table 5
2025 risk zone changes

State	New Tier 2	New Tier 3
Idaho	4	-
Oregon	-	-
Total	**4**	**-**

[15] Scott, Joe H., et al. (2013). *A wildfire risk assessment framework for land and resource management.* United States Department of Agriculture, Forest Service, Rocky Mountain Research Station.

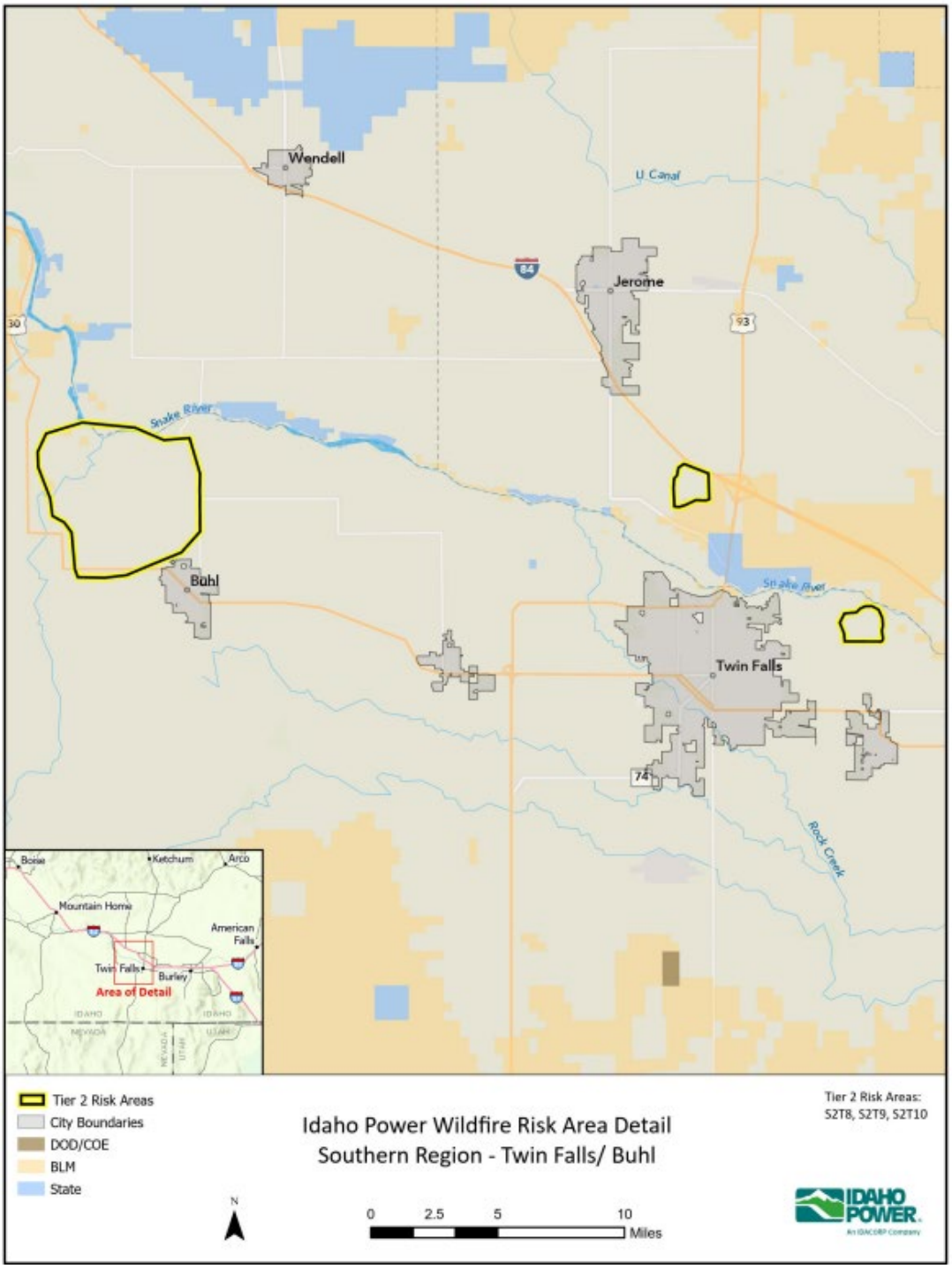


Figure 8
Southern Region – 2025 wildfire risk zone additions

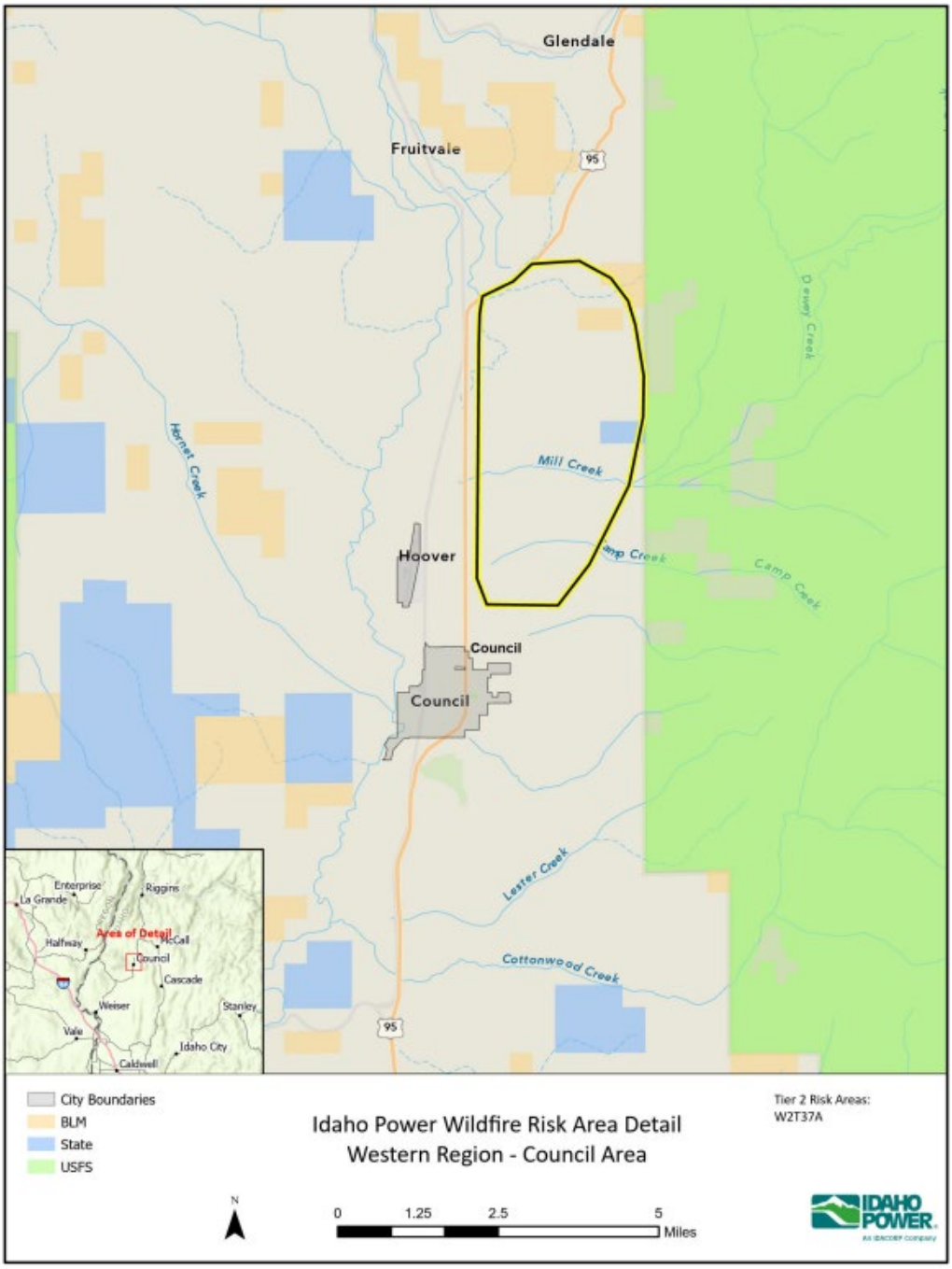


Figure 9
Western Region – 2025 wildfire risk zone additions

Table 6

Idaho Power's overhead transmission and distribution lines by risk zone in Idaho and Oregon*

Asset	All Idaho Power Lines	Lines in Wildfire Risk Zones		Wildfire Risk Zones by State											
				T2-Idaho		T3-Idaho		T2-Oregon		T3-Oregon		T2-Nevada		T3-Nevada	
	Total Pole	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines	Total Pole Miles	% All Lines
Transmission Lines	4604	421	9%	277	6%	115.85	2.5%	16.3	.4%	0	0.0%	11	0.2%	0	0%
Distribution Lines	20995	1899	9%	984	4.7%	718	3.4%	40	0.2%	40	0.2%	0	0.0%	0	0%
Total Pole Miles	25600	2320	9%	1262	4.9%	833	3.3%	56.3	0.2%	40	0.2%	11	0.0%	0	0%

*Total mileage current as of Dec. 31, 2023. Risk zone mileage current as of July 16, 2024. Line mileage reported includes 100% Idaho Power-owned assets and does not include assets in co-ownership.

3.3.1. Maps

The following two-tier wildfire risk map in Figure 10, is illustrative of Tier 2 and Tier 3 throughout Idaho Power's service area. Additionally, figures 11 through 21 reflect Tier 3 zones by region and service area. An illustrative map book of all zones is included in Appendix C. A full and up-to-date risk zone map can be viewed in detail on Idaho Power's website.

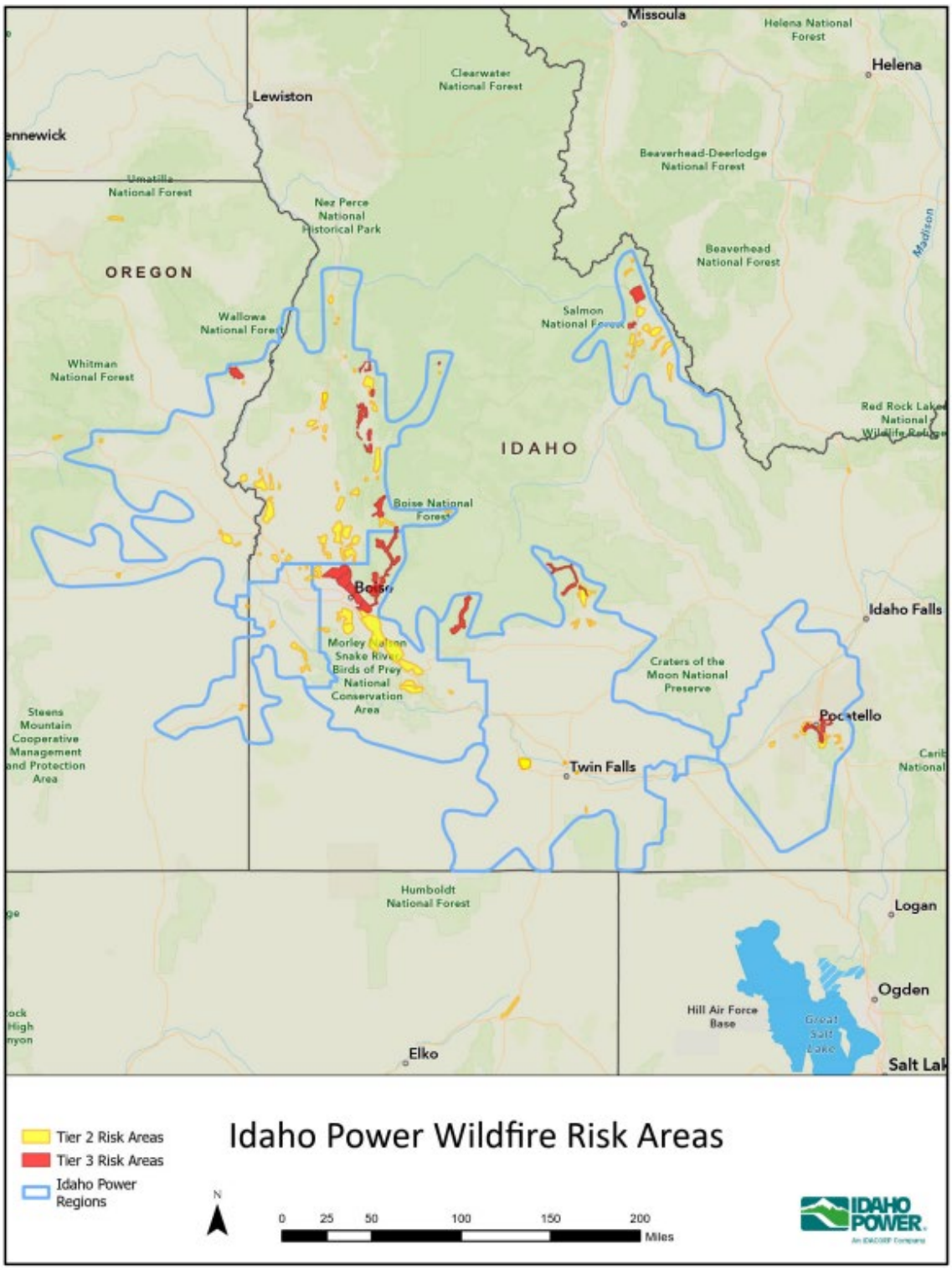


Figure 10
Idaho Power wildfire risk zones

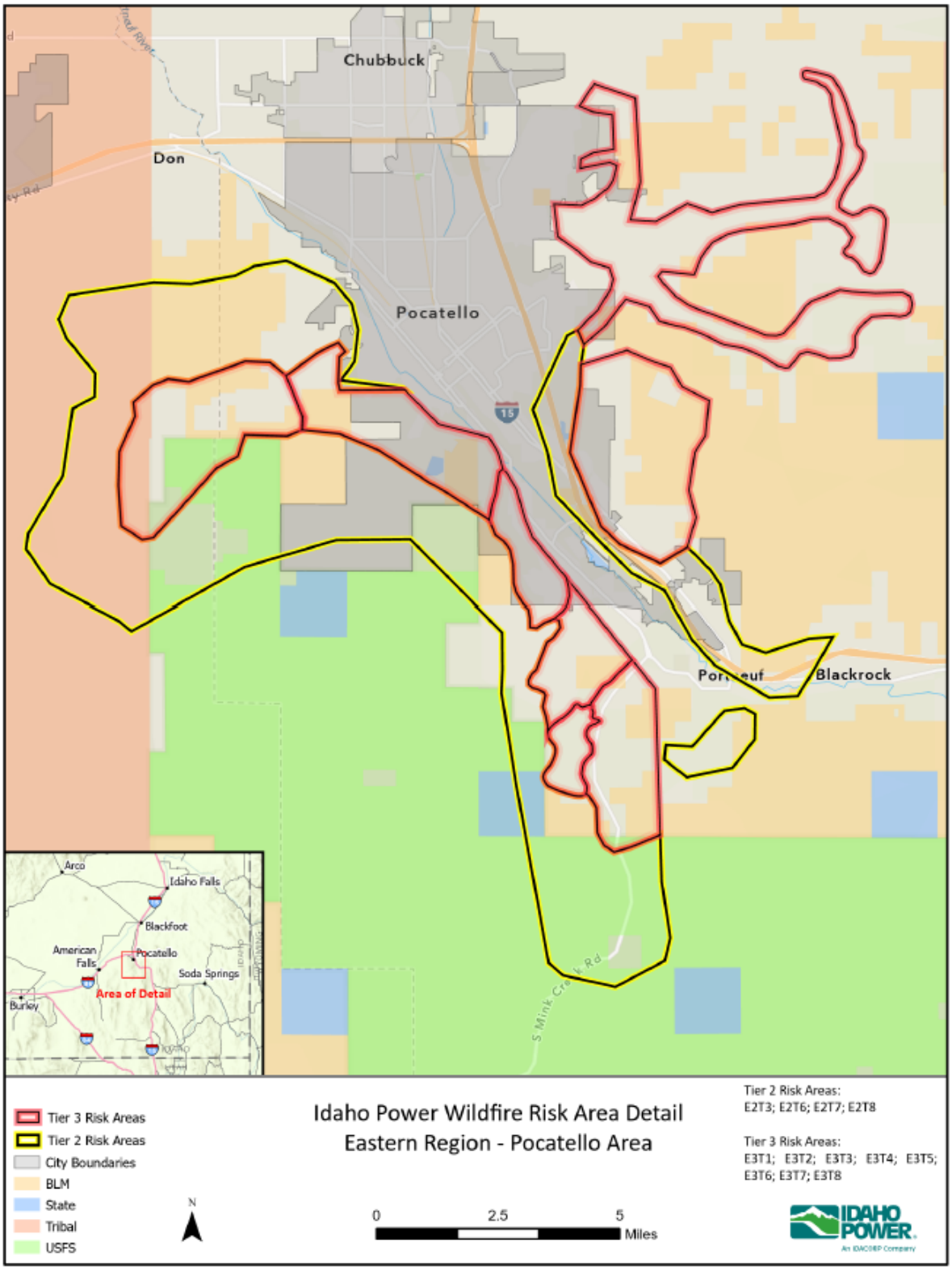


Figure 11
Eastern Idaho–Pocatello area

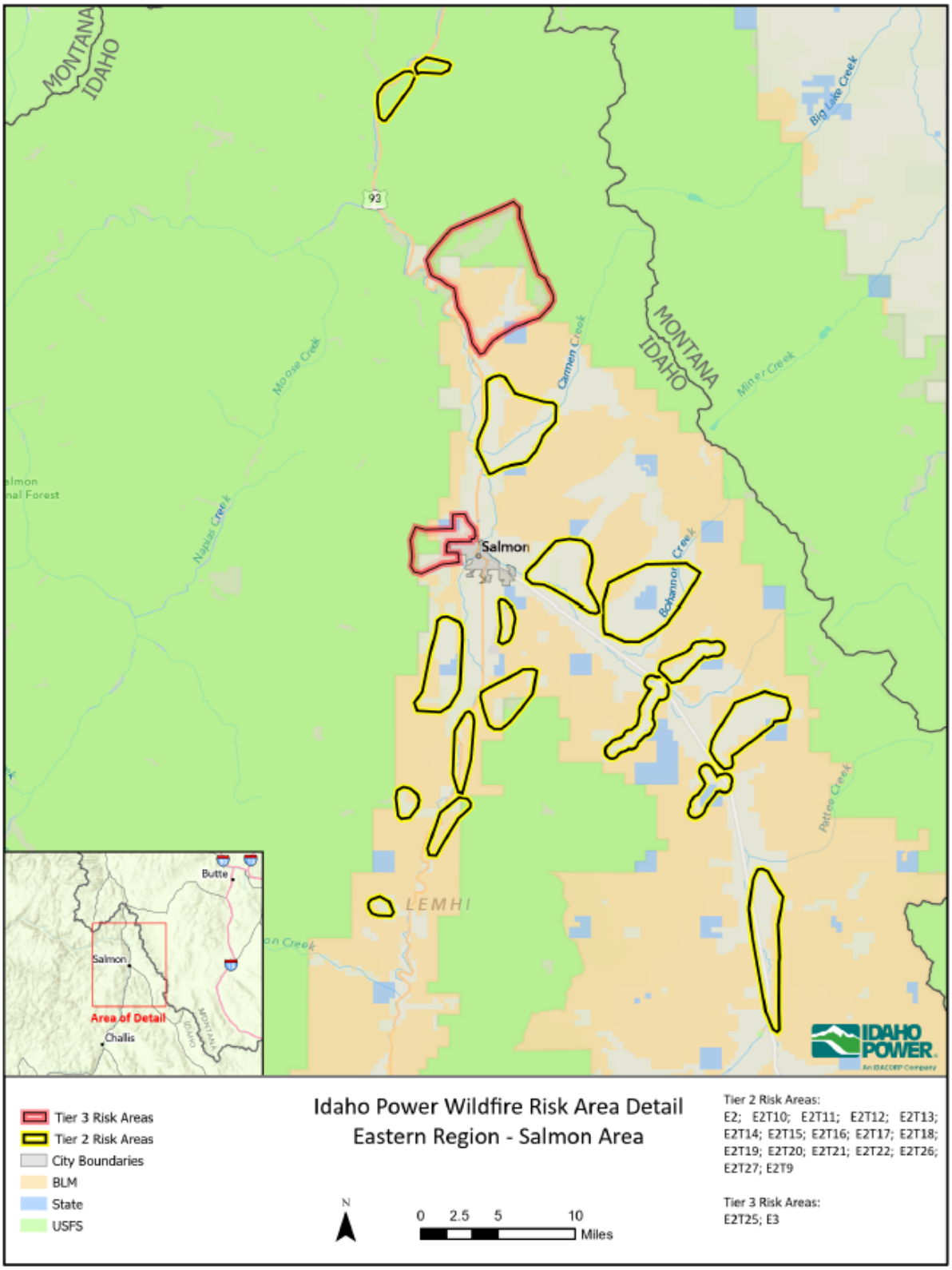


Figure 12
Eastern Region–Salmon area

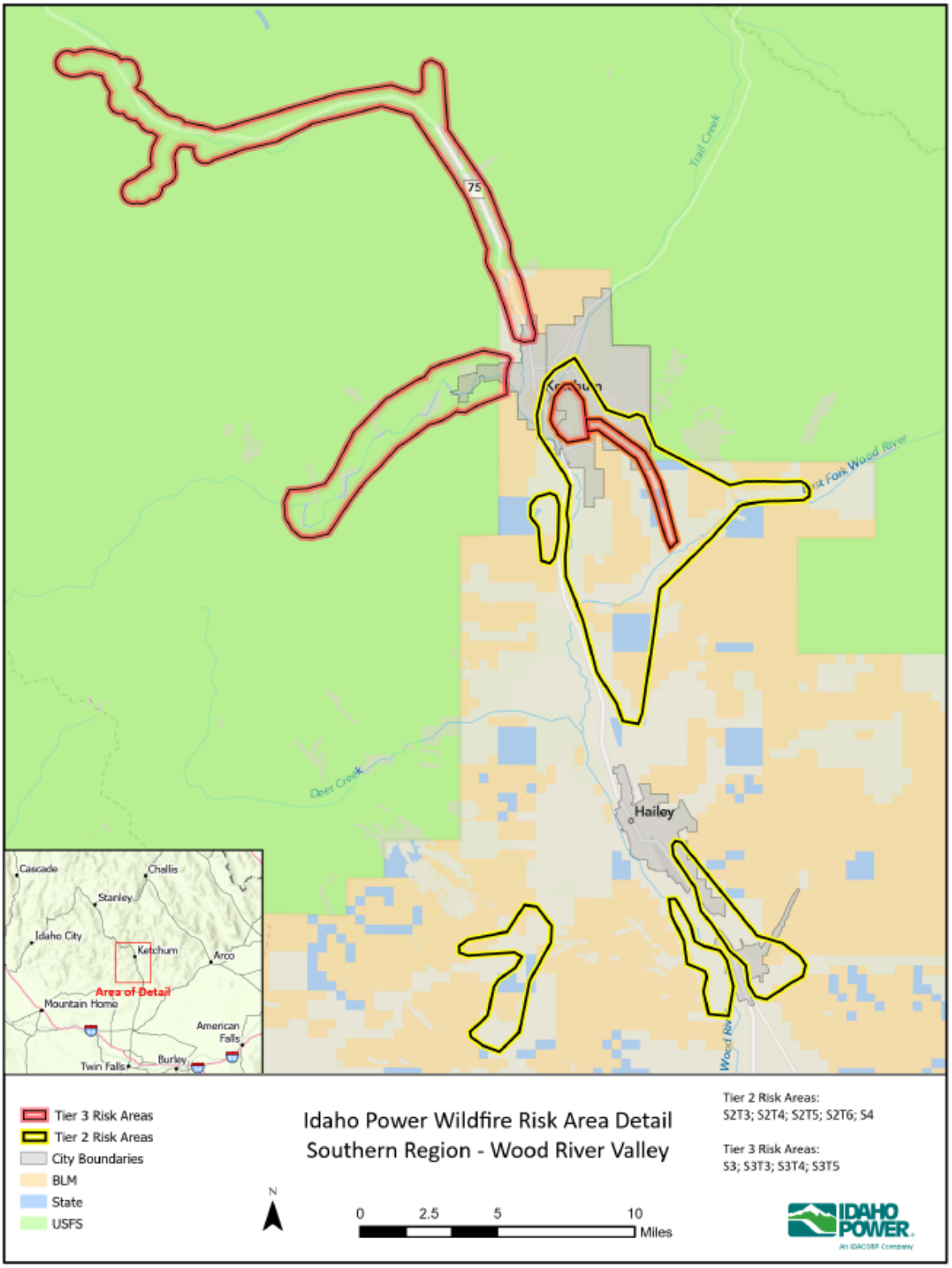


Figure 13
Southern Region–Wood River Valley

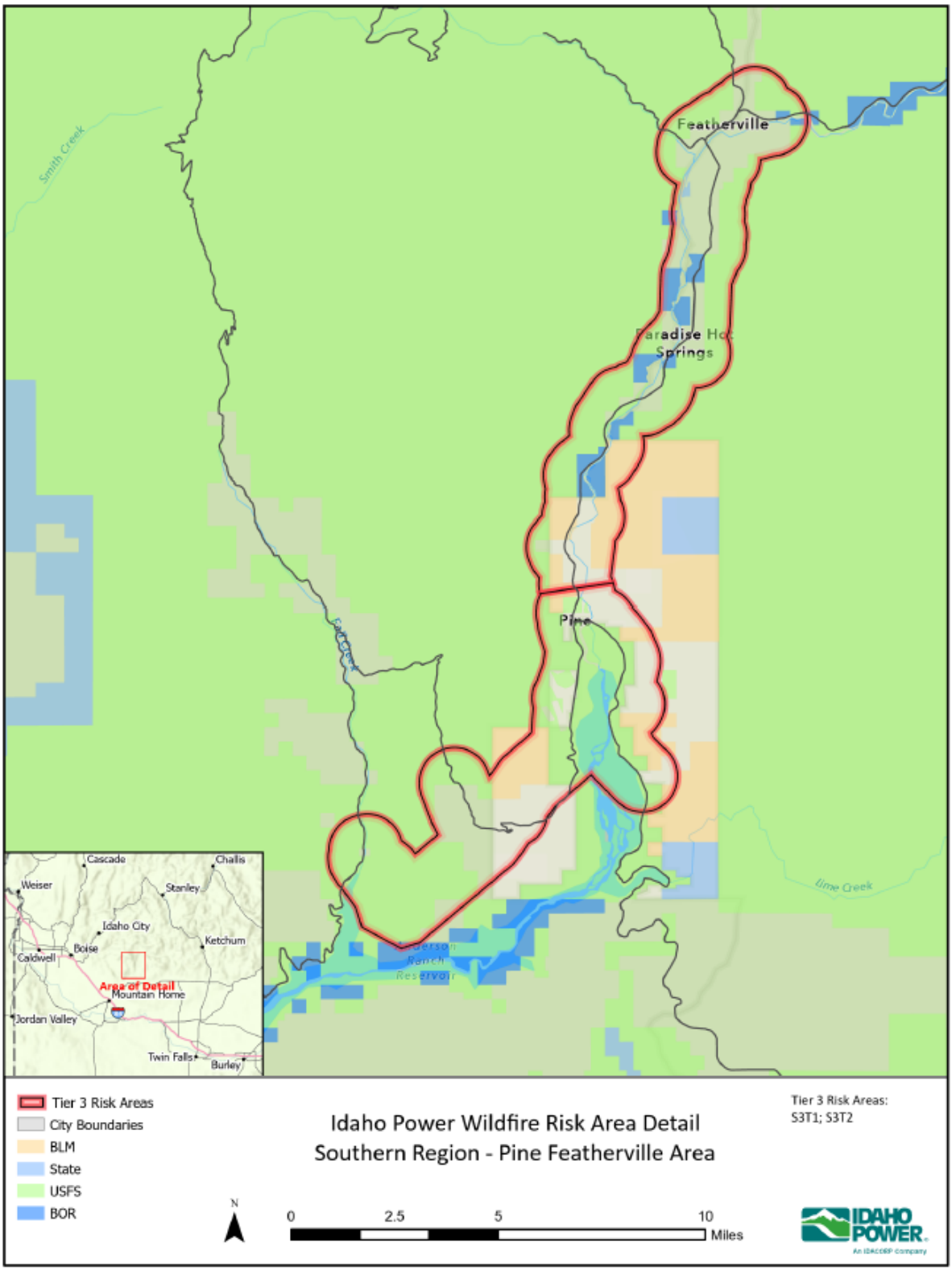


Figure 14
Southern Region–Pine-Featherville

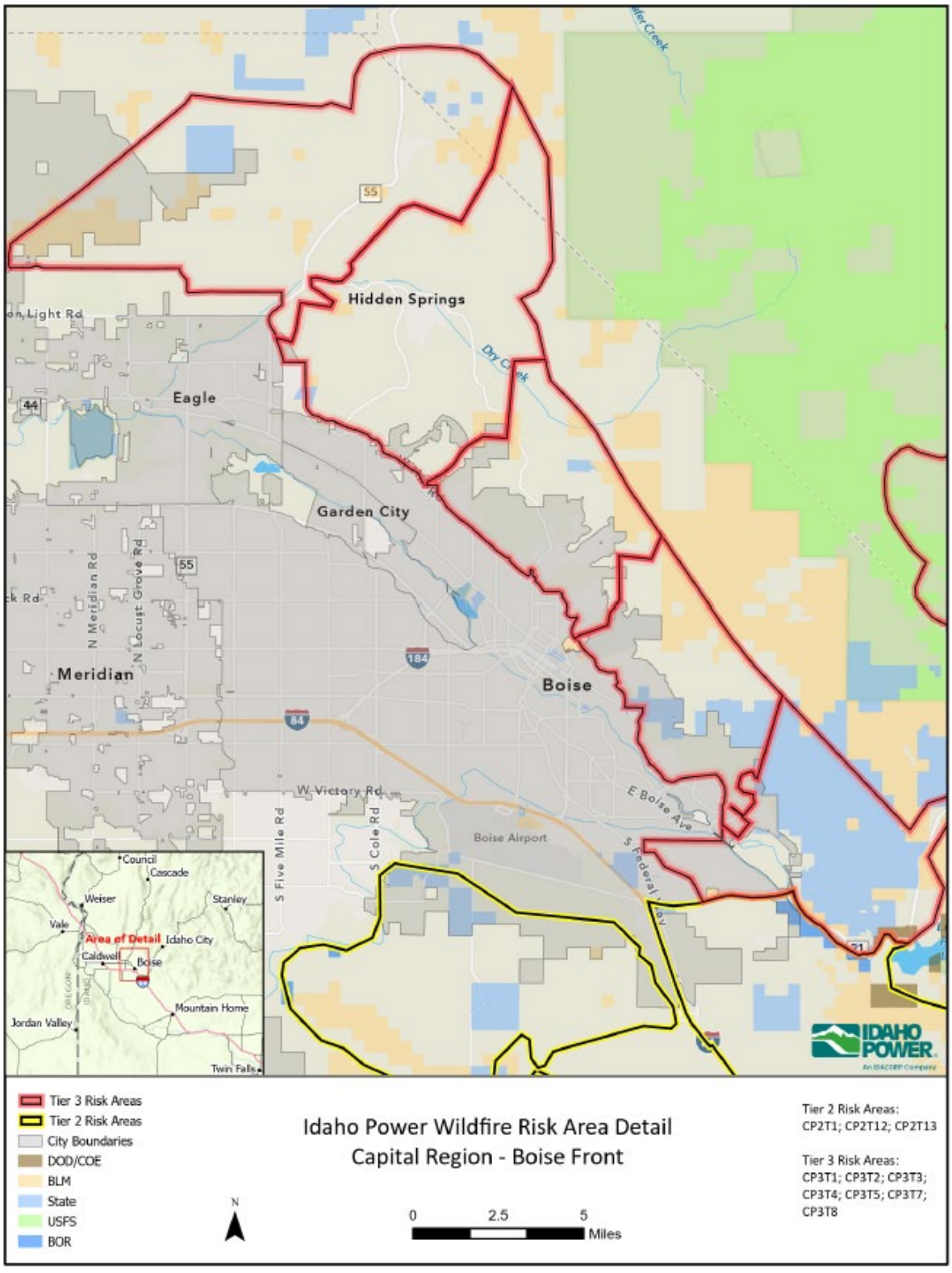


Figure 15
Capital Region–Boise Front

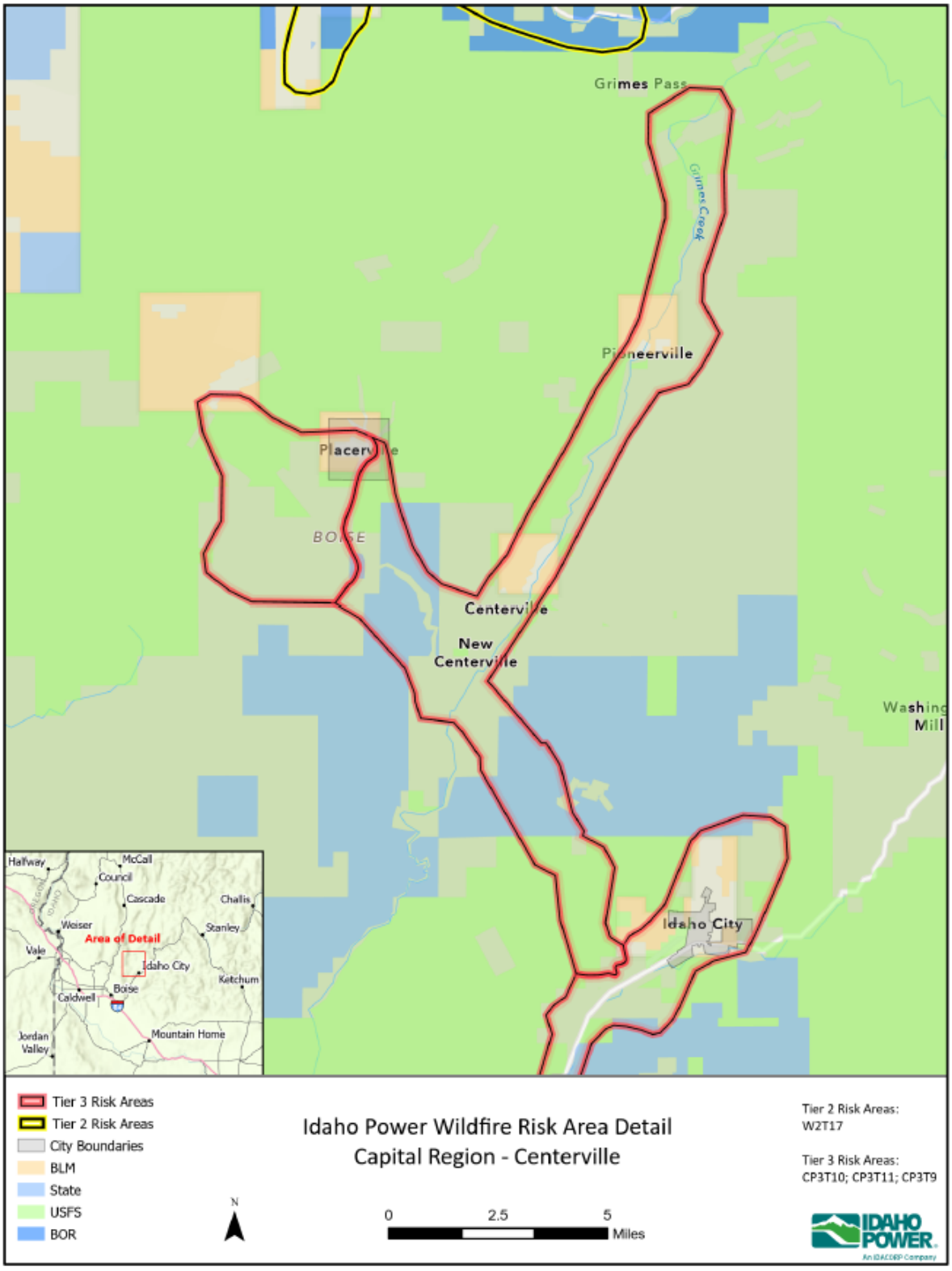


Figure 16
Centerville

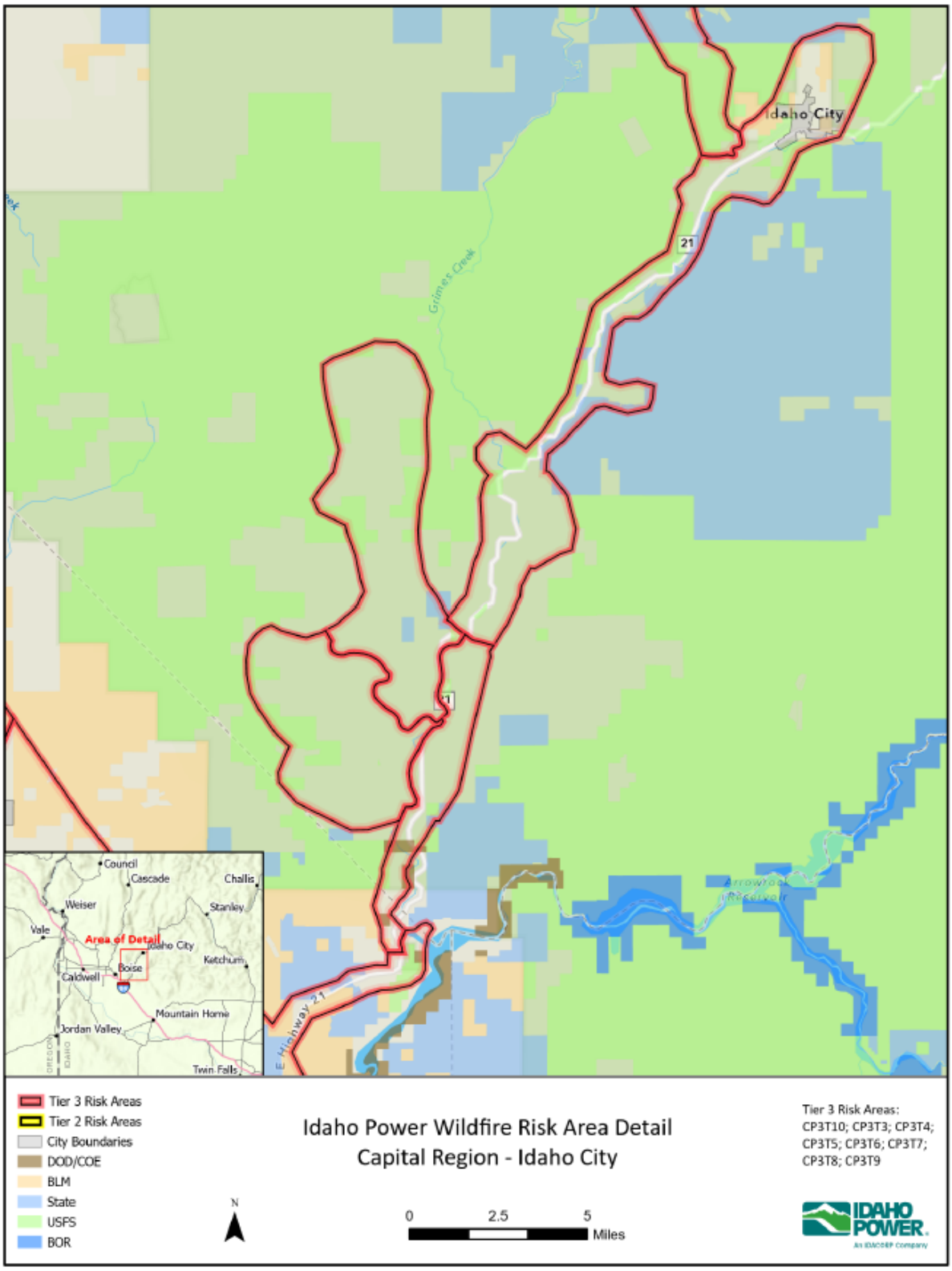


Figure 17
Idaho City area

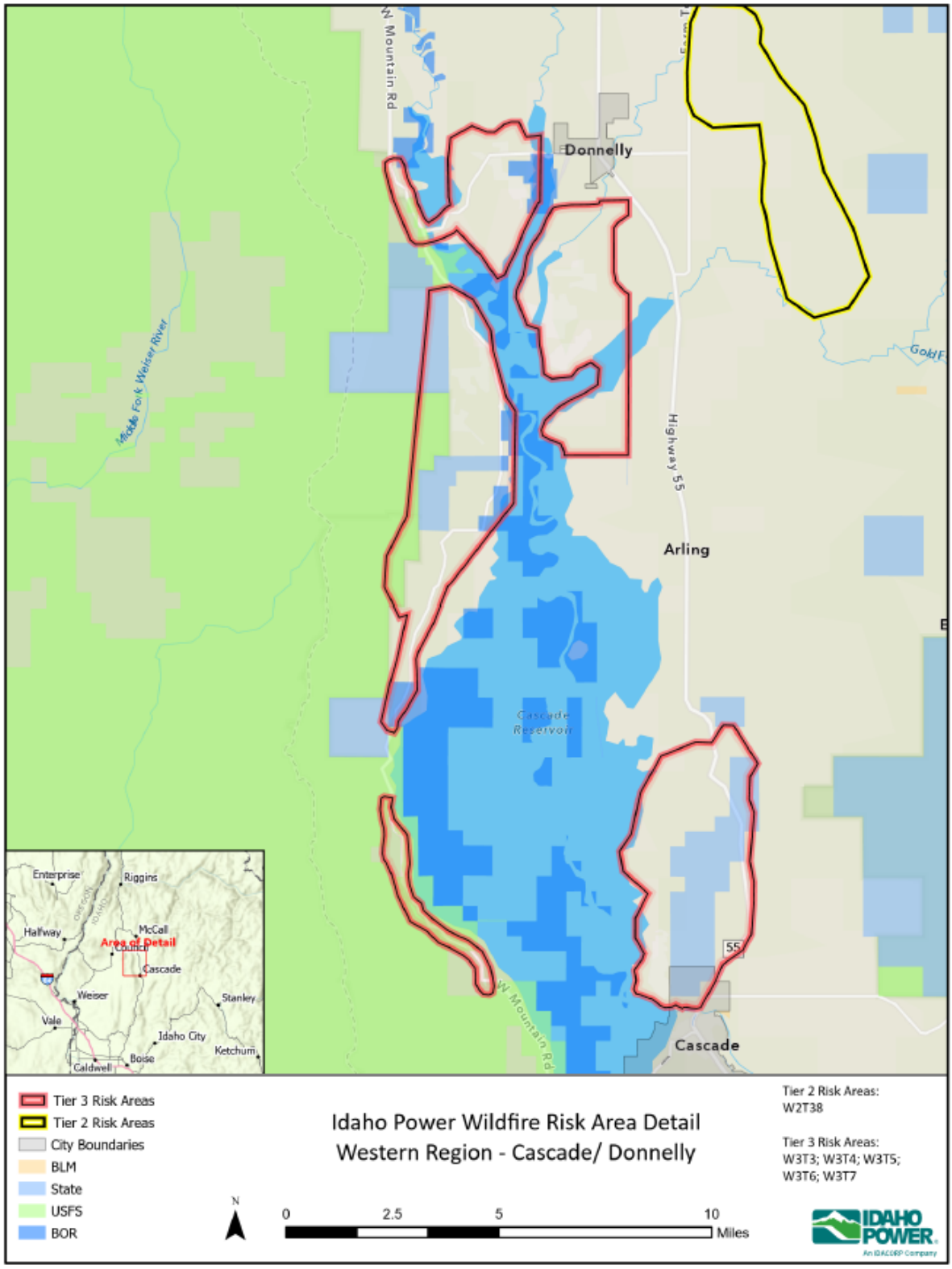


Figure 18
Cascade/Donnelly area

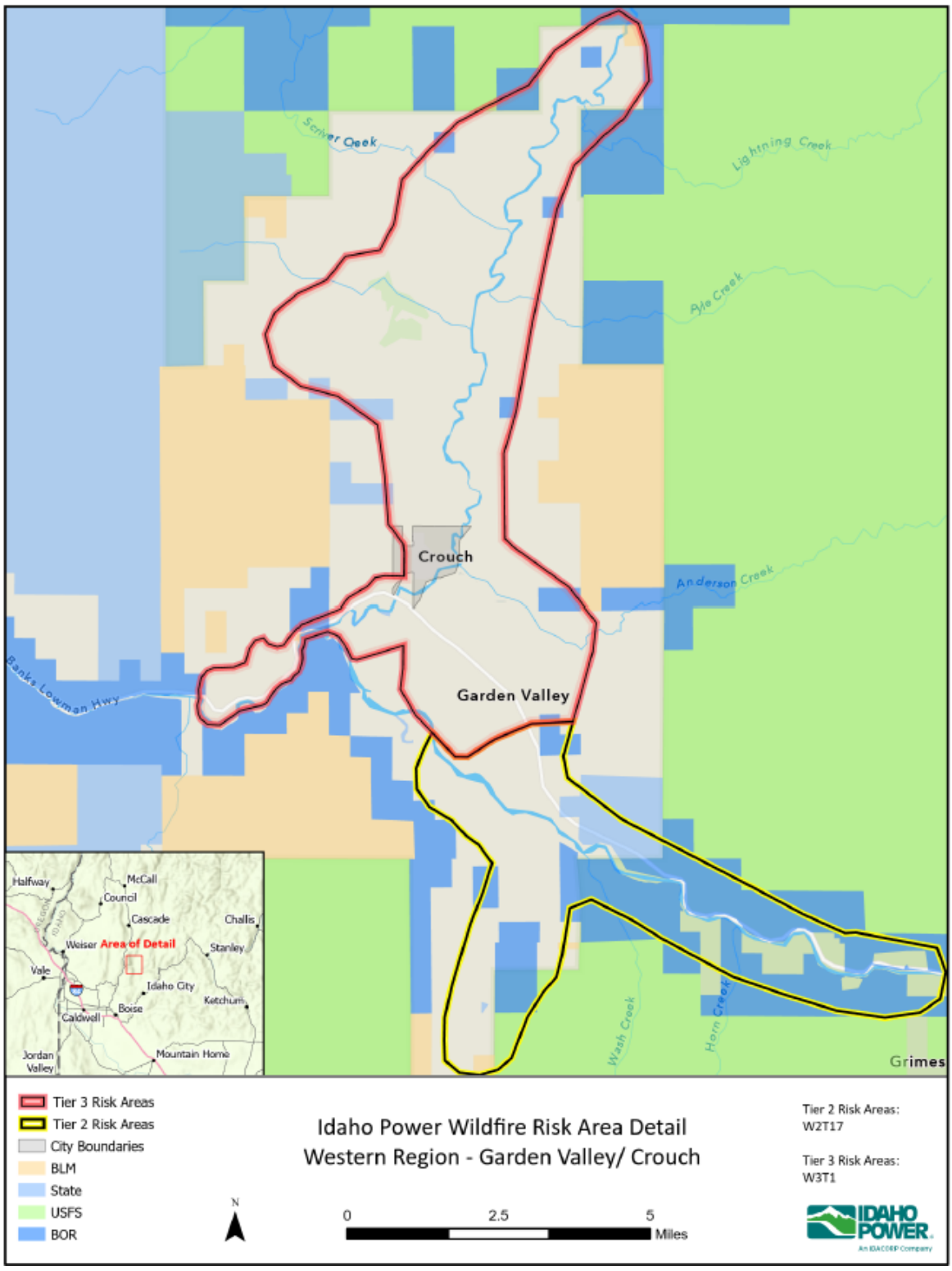


Figure 19
Garden Valley/Crouch area

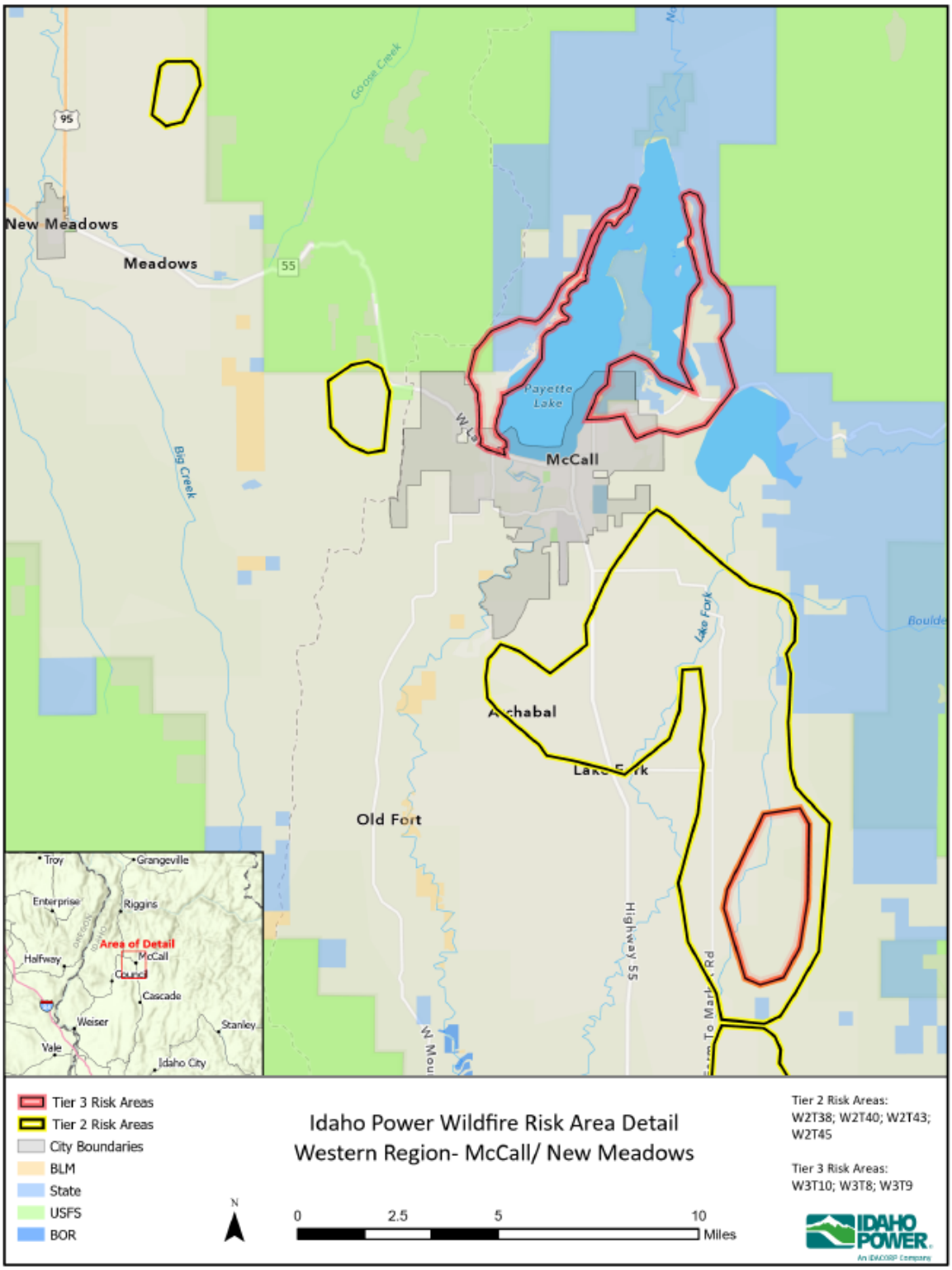


Figure 20
McCall/New Meadows area

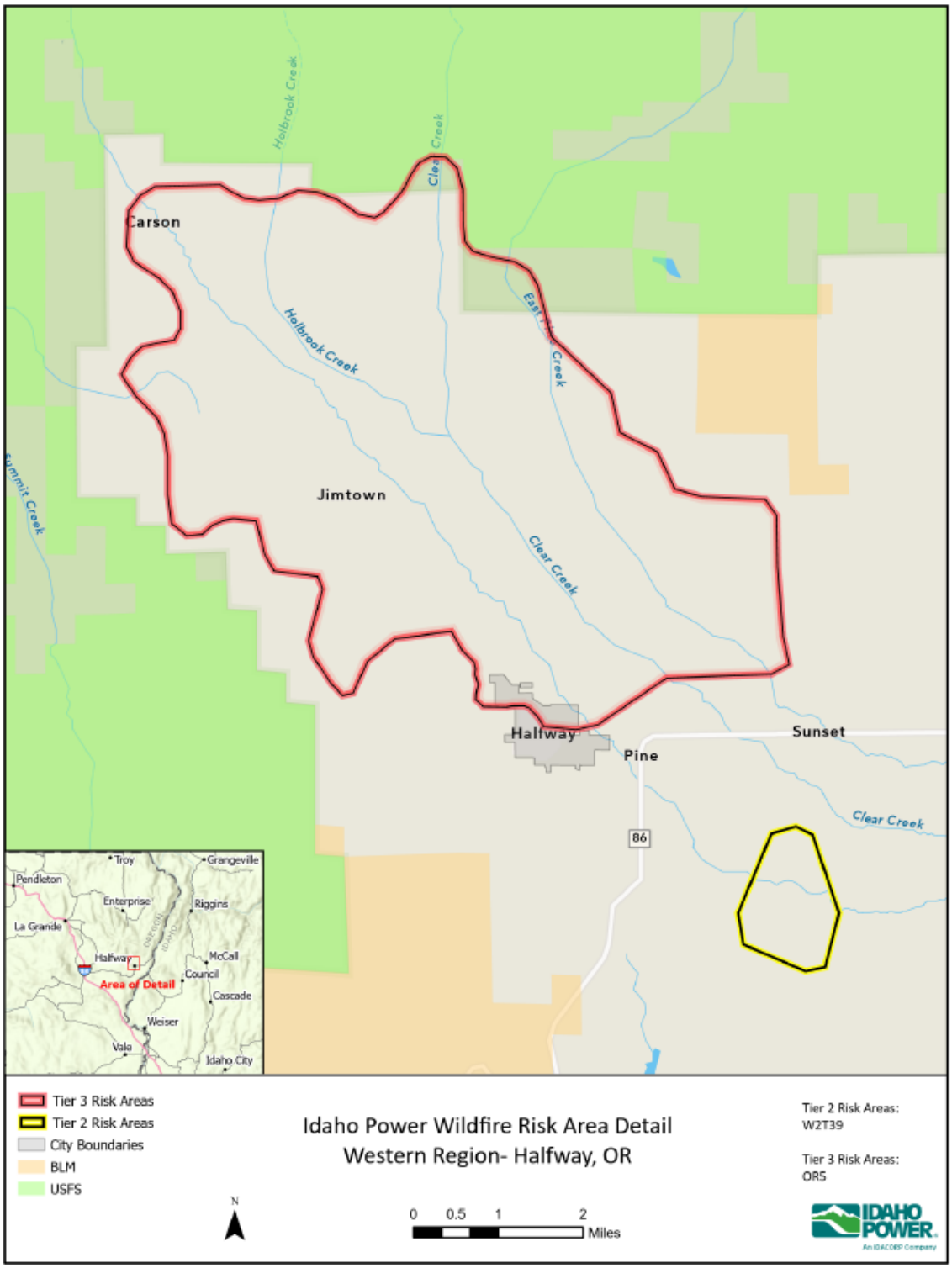


Figure 21
Halfway Oregon

3.3.2. Boardman to Hemingway Proposed Transmission Line

Idaho Power specifically considered the proposed route of the B2H 500-kV transmission line as part of the WMP. The proposed B2H route was included in the wildfire risk assessment and associated map analysis (see Figure 22). Two locations are identified along the route as having elevated wildfire risk (Tier 2 zones), and there are no areas of higher risk (Tier 3 zones). Although the B2H transmission line has not been constructed as of the publication of this 2025 WMP, Idaho Power intends this WMP (as it will be reviewed annually) will apply to B2H once constructed. Additionally, Idaho Power will continue to update its fire risk mapping periodically and address the locations with elevated risk consistent with the mitigation strategy for transmission lines as described in sections 5 through 9 of this WMP.

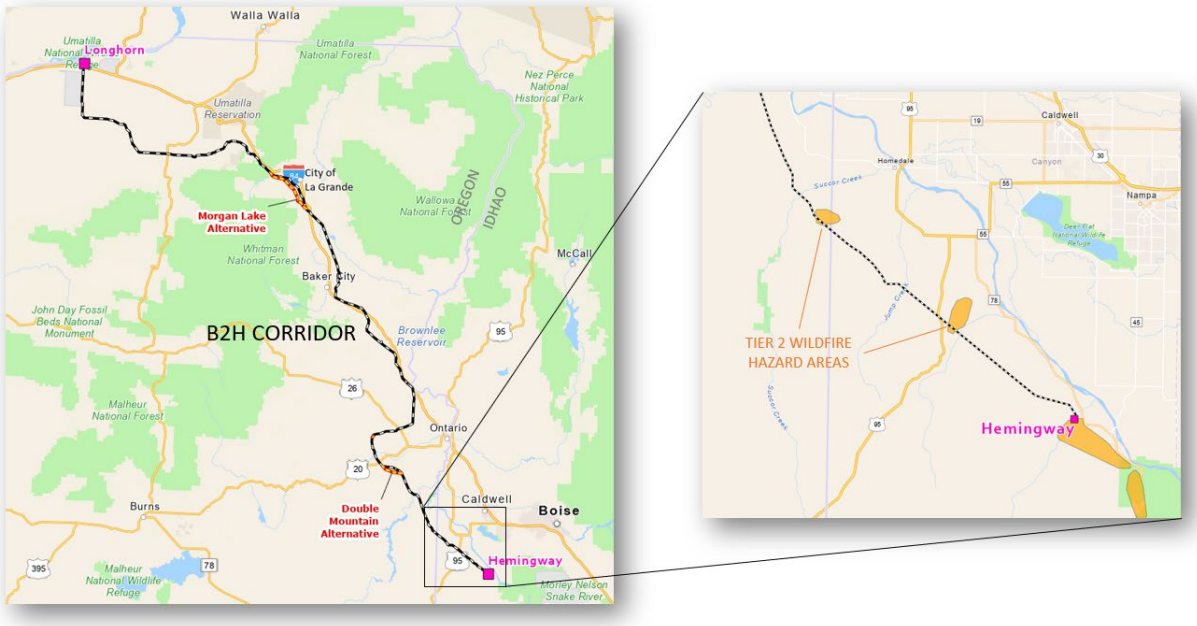


Figure 22
Proposed B2H route

4. Mitigation Approach

4.1. Objective

This section details Idaho Power's assessment of general risk with respect to undertaking wildfire mitigation activities. This assessment provides a framework for understanding the potential consequences of wildfire damage and the possibility of diminishing those consequences through targeted mitigation activities.

To that end, Section 4.4 identifies selected mitigation activities and the estimated costs of those activities on a system level. In Section 4.5, each mitigation activity is discussed in detail, with an assessment of why it was selected, what alternatives (if any) may be available, and any additional benefits (referred to as "co-benefits") the company believes may result from pursuing it.

4.2. Risk-Based Cost and Benefit Analysis of Wildfire Mitigation

Idaho Power understands that wildfires have impacts beyond monetary costs, and it is committed to taking the actions detailed in this WMP to reduce the risk of wildfire based on its core values of safety, reliability, integrity, and affordability. That said, Idaho Power also understands that its regulators and customers are interested in the monetary costs of wildfire and wildfire mitigation. Idaho Power therefore provides a cost-benefit based analysis as part of its WMP.

In assessing the probability and consequence of wildfire risk, and to identify benefits of various wildfire mitigation efforts, Idaho Power engaged with an external consultant and considered several sources of empirical data on the costs of major wildfires—both in terms of fires that burn into Idaho Power's facilities or that originate from electric infrastructure. These costs can include replacement costs of the company's property; the cost of fire suppression and environmental damage; third-party claims for property damage; employee and public injuries and fatalities; and other economic losses.

Through its research, Idaho Power found that obtaining a precise calculation of the potential costs of future wildfires is not possible. The damage that any fire may cause depends on factors such as wind and weather, vegetation, fire risk levels, location, and population and structure density.

Idaho Power's assessment of the potential costs of wildfires—used in developing the WMP and the scope of proposed updates to practices—involved a review of prior major fires in other states, as well as calculations by other western utilities. While this assessment did not yield a precise quantification of potential benefits specific to Idaho Power, it provides a helpful illustration of the potential costs of not taking actions aimed at reducing wildfire risk.

For example the Maui wildfires in 2023 are expected to exceed $12 billion[16] and in California, costs and damages associated with wildfires in recent years have exceeded $10 billion per year, with those associated with the 2020 fires alone potentially set to exceed $20 billion.[17] This increase[18] is consistent with the fact that, with few exceptions, the prevalence, intensity, and impact of wildfires continues to escalate year after year as evidenced by information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) and detailed in Table 7.

Table 7
CAL FIRE wildfire data by year

Year	Estimated Acres Burned	No. of Wildfires	No. of Confirmed Fatalities	No. of Structures Damaged or Destroyed
2024*	1,040,146	7,668	1	2,077
2023	332,822	7,386	4	157
2022	331,358	7,477	9	946
2021	2,569,386	7,396	3	3,560
2020	4,197,628	9,279	31	11,116
2019	259,823	7,860	3	703
2018	1,975,086	7,948	100	22,868
2017	1,548,429	9,270	47	10,868
2016	669,534	6,954	6	1,274

*As of November 15, 2024

The data compiled by peer utilities, historic fire costs, and known damage from prior fires are instructive and reasonably conclude that the incremental costs of wildfire mitigation efforts are prudent. Considering the available historical information and data regarding wildfire risks and losses, Idaho Power is working with PacifiCorp and Portland General Electric as a joint utility working group on a strategy for the future creation of a common framework evaluating risk reduction benefits relative to cost.

Risk spend efficiency (RSE) is a tool that can be used to better understand how a proposed mitigation approach may incrementally reduce wildfire risk. At a basic level, RSE is calculated as

[16] Kevin Knodell, *Overall costs for the Maui wildfires are expected to top $12 billion*, The Star Advertiser, November 21, 2024, at https://www.staradvertiser.com/2024/08/10/hawaii-news/overall-costs-for-maui-wildfires-are-expected-to-top-12-billion.

[17] Jill Cowan, *How Much Will the Wildfires Cost?*, The New York Times, Sept. 16, 2020, at nytimes.com/2020/09/16/us/california-fires-cost.html.

[18] Idaho Power believes its system is in notably better condition than some utilities in California. Nevertheless, these figures illustrate the destruction that can occur from vegetation contact if vegetation is not actively managed.

a ratio between overall cost and risk reduction achieved. RSE includes analyzing risk mitigation alternatives, the expected risk reduction, and considers the lifecycle costs and other constraints of the mitigation. RSE metrics can be compared to one another, ultimately allowing for the ability to assess one mitigation approach against another to evaluate the effectiveness of an investment relative to reducing wildfire risk while minimizing ratepayer impact.

With RSE being a ratio, it is important to note that mitigations with high costs and high associated risk reduction may have the same RSE as mitigation with low cost and small associated risk reduction. RSE is not a measure that can indicate if a risk reduction threshold is being achieved and, accordingly, desired risk levels may warrant greater spend to achieve the objectives of an independent utility's WMP. Idaho Power will continue to expand RSE efforts with a specific focus on trying to accurately quantify risk reduction and to determine how RSE may be used as one of many inputs in the overall decision-making processes for mitigation approaches and alternatives.

4.3. Risk Analysis and Drivers

Idaho Power's risk management framework is modeled after the internationally recognized risk management standard, ISO 31000. ISO 31000 provides a comprehensive framework for effective risk management with six distinct steps summarized in the graphic below.

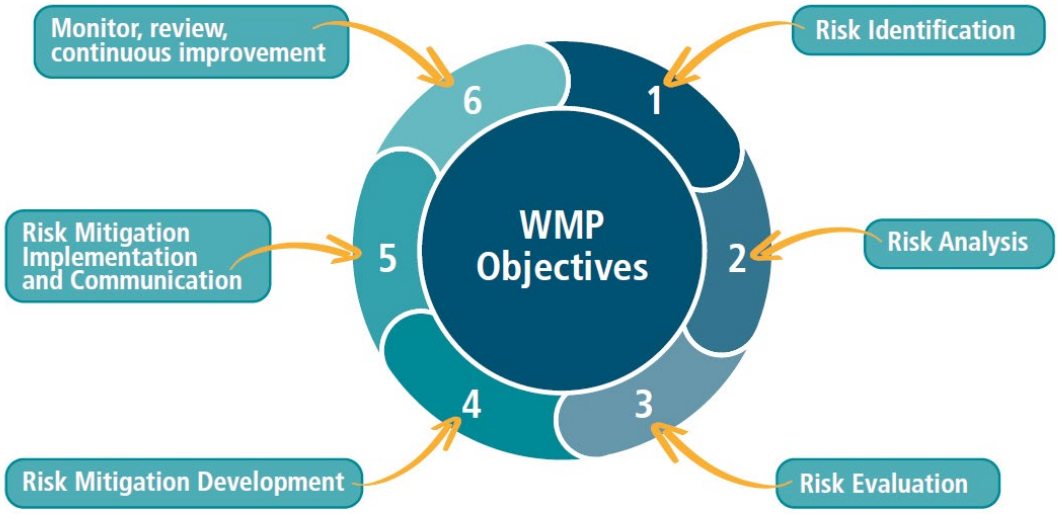


Figure 23
Idaho Power WMP risk management framework

The framework provides Idaho Power with a structured approach to wildfire mitigation planning by enabling systematic identification, assessment, and management of wildfire risk.

Idaho Power faces evolving wildfire risk and continues to advance its risk management processes to better understand sources of risk and to identify the best solutions to further reduce risk in the future. Managing risk is an evolving process and while not all risk can be eliminated, Idaho Power's goal is to proactively prepare and enhance its infrastructure and operational practices to deliver safe and reliable energy today and in the future. The company continues to work to systematically identify, analyze, evaluate, mitigate, and monitor risks associated with wildfire.

In 2023, Idaho Power partnered with a consulting firm to reassess ignition risks from overhead transmission and distribution facilities and gain a deeper understanding of how wildfire risk can be quantified. A project team was formed and held three workshops throughout the year with subject-matter experts (SME) from various departments within the company. The team used the ISO 31000 standard as a guide for identifying and evaluating equipment-specific risks in the context of wildfire ignition. Risk drivers and scenarios were analyzed to determine the likelihood and impact of wildfire, which led to the creation of the risk bow-tie diagram, shown in Figure 24, and used as a visual representation of risk. The company plans to re-evaluate risk drivers in 2025 and incorporate information from ignition tracking efforts into the review process, providing insights from past incidents and near-miss events.

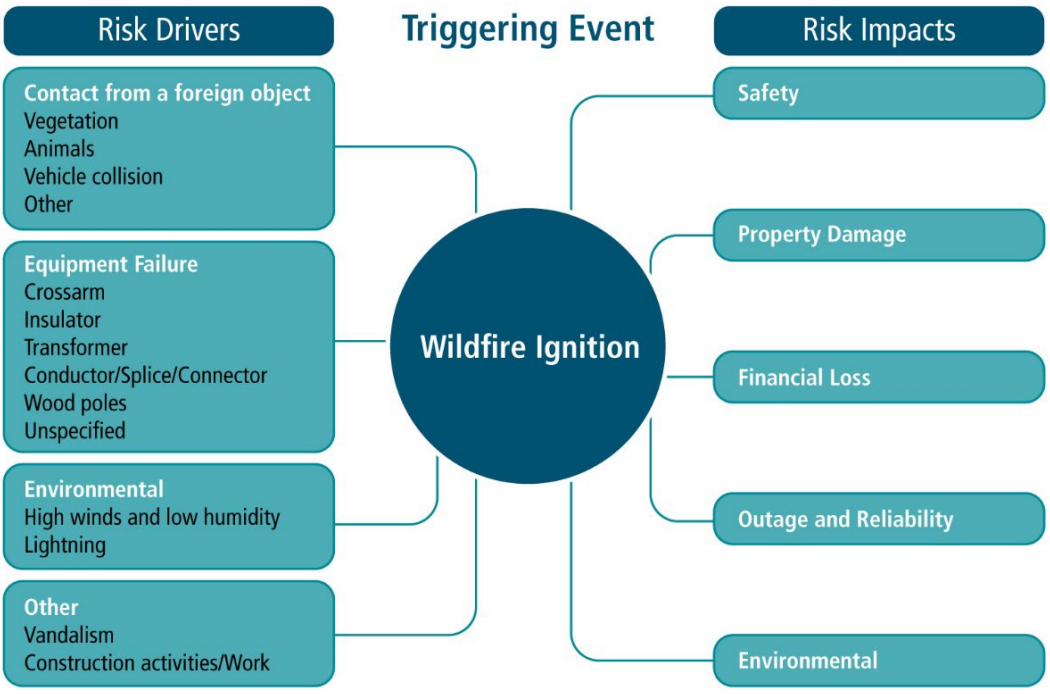


Figure 24
Risk bow-tie diagram

The bow-tie analysis considers the risk exposure throughout Idaho Power's 24,000 square mile service area and locations having overhead transmission and distribution facilities. The bow-tie is constructed using three components described below.

- **The Triggering Event**: The event Idaho Power aims to avoid that could impact the company's ability to meet its objectives of providing safe, reliable, and affordable energy.

- **Risk Drivers**: Factors that may potentially lead to an ignition are listed on the left side of the bow tie. Actual conditions play a key role in whether a wildfire occurs as a result of an ignition, and it is important to note the risk drivers shown are only an indication that a risk event may occur.

    - *Contact from a foreign object*—Contact with foreign objects, including vegetation, animals, balloons, and other wind-blown objects.

    - *Equipment failure*—The unexpected failure of line equipment due to discrete (internal) or destructive (external) conditional changes.

    - *Environmental*—Extreme weather conditions that include high wind, low humidity, and drought contribute to increase the risk of wildfire and can lead to tree failure, vegetation contact, and failure of electrical equipment.

    - *Other*—Overhead powerlines may be at risk of vehicle collisions, vandalism, or physical attack. Construction activities, including activities performed by sub-contractors, near overhead powerlines may be a risk driver if proper safety precautions are not taken to eliminate inadvertent equipment contact.

- **Risk Impacts**: While most fires are extinguished quickly, the right side of the bow-tie describes the range of possible outcomes associated with the risk event. Impacts vary largely based on where the event occurs and actual conditions. The impacts shown are worst-case scenarios.

Idaho Power has identified and implemented mitigations for each of the top risk drivers shown in the risk bow-tie with details provided throughout the WMP. Each type of mitigation is designed to reduce one or more of the risk driver frequencies or modify the potential impacts or outcomes. Primary mitigation programs and activities include overhead circuit hardening, underground conversions, expanded vegetation management and asset inspections, and public safety power shutoff (PSPS).

4.3.1. Probabilistic Risk Modeling

Idaho Power's approach to performing wildfire risk assessments includes the identification of hazards and estimating their relative likelihood of occurrence and potential consequences

through feedback from SMEs and utilizing data when available. In 2024, the company began to integrate data science into wildfire risk assessments by combining analytics with new and existing data sources to provide greater insight into predicting asset failure and vegetation risk. This work will enable the company to leverage large volumes of data for predictive insights and help inform decision-making. The company expects that implementing a data-driven approach will take several years to mature and will provide insights to help prioritize infrastructure upgrades and identify which risk-management strategies are most appropriate given practical constraints, such as limited resources and time.

As part of this effort, in 2024, Idaho Power began work to enhance existing risk quantification methods by integrating asset parameters, such as age, conductor type, phasing, and outage history into the company's existing risk data. The team will continue this work in parallel with the implementation of new wildfire risk modeling software, Technosylva, to ultimately lead to a detailed distribution circuit-specific ranking (or circuit segment ranking). The enhanced risk scores will also establish a baseline that will enable calculation of the risk reduction benefit (RSE) from specific mitigation practices.

In 2024, the company began work combining analytics with vegetation management activities by developing a probabilistic model called Vegetation Risk Index (VRI). The VRI is intended to help Idaho Power quantify the likelihood of vegetation contact under specific conditions, such as extreme weather events. The model considers variables such as tree density, species, outage history, and meteorology data, which helps provide insight into how atmospheric conditions may impact growth rates of certain species and where certain high-risk vegetation areas may exist as conditions change. The model is anticipated to provide a co-benefit of informing where Idaho Power may want to focus additional tree inspection activities in advance of wildfire season or on certain high-risk days that include PSPS events. Work performed thus far has demonstrated the potential benefits of combining innovative analytics with traditional mitigation practices to enhance reliability, reduce risks, and ensure public safety. Idaho Power anticipates completing an initial version of the VRI in 2025 and will begin utilizing it once it is finalized. .

4.4. Wildfire Mitigation Cost Summary

From 2025 through 2029, Idaho Power estimates investing $275 million in operations and maintenance (O&M) expenses to further wildfire mitigation measures. Table 8 summarizes the company's planned expenditures associated with executing its WMP through 2029. Estimated amounts reflect the company's best estimates and plans as of the 2024 WMP. These estimates will likely change in the future as the company reviews and refines its WMP and associated mitigation activities. For the 2025 WMP, each wildfire mitigation category—and associated estimated expenditures in Oregon and Idaho—is discussed in Section 4.5.

Table 8

Estimated system-wide O&M expenses for wildfire mitigation, $000s (2024–2029)*

*As of December 29, 2024.

	2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	5-Year Forecast Total	5-Year Forecast Total Idaho	5-Year Forecast Total Oregon
A. Quantifying Wildland Fire Risk								
Dynamic Risk Modeling - Risk Maps, Fire Simulation, Risk Spend Efficiency, Probabilistic Model Development and Support	$2,040	$2,385	$2,385	$2,502	$2,502	$11,814	$11,223	$591
B. Situational Awareness								
Weather Forecasting - System development and support, data services, climatology	$302	$33	$8	$8	$8	$359	$341	$18
Weather Forecasting Personnel - Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS)	$171	$176	$181	$187	$192	$908	$862	$45
Weather Forecasting - Weather Station Maintenance	$41	$212	$306	$327	$348	$1,234	$1,172	$62
Pole Loading Modeling & Assessment (Contract service)	$75	$75	$75	$75	$75	$375	$356	$19
Wildfire Detection Cameras	$190	$255	$315	$375	$435	$1,570	$1,492	$79
C. Mitigation - Field Personnel Practices								
Tools/Equipment	$5	$5	$5	$5	$5	$25	$24	$1
Mobile Weather Kits for Field Observers	$2	$2	$2	$2	$2	$10	$10	$1
International Wildfire Risk Mitigation Consortium	$40	$40	$42	$42	$42	$206	$196	$10
D. Mitigation - Transmission & Distribution Programs								
O&M Component of Capital Work	$130	$156	$183	$201	$210	$879	$835	$44
Annual O&M T&D Patrol Maintenance Repairs	$100	$300	$300	$300	$300	$1,300	$1,235	$65
Environmental Management Practices	$25	$25	$25	$25	$25	$125	$ -	$125
Transmission Thermography Inspection Mitigation	$50	$50	$50	$50	$50	$250	$85	$165

		2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	5-Year Forecast Total	5-Year Forecast Total Idaho	5-Year Forecast Total Oregon
	Distribution Thermography Inspection Mitigation	$30	$30	$30	$30	$30	$150	$143	$8
	Thermography Technician Personnel	$159	$164	$169	$174	$179	$844	$802	$42
	Transmission Wood Pole Fire Resistant Wraps	$250	$250	$250	$250	$250	$1,250	$1,188	$63
	Wildfire Mitigation Program Labor	$1,338	$1,378	$1,419	$1,462	$1,506	$7,104	$6,748	$355
	Patrolmen for Wildfire Safety Inspections in Wildfire Risk Zones	$253	$358	$369	$380	$391	$1,751	$1,663	$88
	Covered Wire Evaluation - Pilot Program in PSPS Zones	$20	$ -	$ -	$ -	$ -	$20	$19	$1
	Drone Beyond Visual Line of Sight Waiver for PSPS Patrols	$120	$120	$ -	$ -	$ -	$240	$228	$12
	Aerial Drone Inspection Pilot	$214	$380	$390	$399	$409	$1,792	$1,702	$90
E. Vegetation Management									
	Transition to/Maintain 3-year Vegetation Management Cycle	$42,200	$45,576	$43,297	$45,462	$49,099	$225,634	$210,946	$14,688
	Enhanced Practices for Distribution Red & Yellow Risk Zones (Pre-Fire Season Patrols/Mitigation, Pole Clearing, Removals, Work QA)	$1,486	$1,709	$1,760	$1,813	$1,839	$8,607	$7,689	$918
	Line Clearing Personnel	$173	$178	$184	$189	$195	$919	$873	$46
	Fuel Reduction Program	$75	$75	$75	75	75	$375	$356	$19
	Vegetation Mgmt. Satellite/Aerial/LiDAR	$100	$100	$100	$100	$100	$500	$475	$25
F. Communications									
	Wildfire/Wildfire Mitigation Education/Communication - Advertisements, Bill Inserts, Meetings, Other & PSPS Customer Education/Communication - Advertisements, Bill Inserts, Other	$171	$171	$171	$171	$171	$855	$812	$43
	Public meetings/event fees for PSPS engagement, maps, flyers	$10	$10	$10	$10	$10	$50	$40	$10
	PSPS and Wildfire Event Management Support	$188	$194	$200	$206	$212	$1,001	$951	$50

		2025 Forecast	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	5-Year Forecast Total	5-Year Forecast Total Idaho	5-Year Forecast Total Oregon
	Community and Customer Engagement and Outreach	$161	$166	$171	$176	$181	$187	$177	$9
G. PSPS/Emergency Preparedness and Technology									
	Communication/Alert Tool development (System set up, outage maps, critical facilities identification)	$ -	5	5	5	5	$20	$19	$1
	Communication/Alert Tool for PSPS Customer Alerts/Extended Use	200	200	200	200	200	$1,000	$950	$50
	PSPS and Wildfire Encroachment Event Management Software	$ -	50	53	55	58	$216	$205	$11
	Fire Suppression Resources	105	110	116	121	127	$579	$550	$29
	Standby Helicopter Service	560	577	594	612	630	$2,973	$2,824	$149
	Community Resource Centers	5	5	5	5	5	$25	$24	$1
	Mobile Generators	30	30	30	30	30	$150	$143	$8
Total		**$51,019**	**$55,550**	**$53,474**	**$56,023**	**$59,897**	**$275,295**	**$257,358**	**$17,937**

4.5. Wildfire Mitigation Activities

Idaho Power utilizes individual wildfire risk mitigation activities based on a variety of factors, including assessment of industry best practices in wildfire mitigation; discussions with peer utilities; consultation with government entities and agencies; and with consideration of alternatives that could be pursued. While these initiatives are primarily intended to mitigate the risk and impacts associated with wildfire, additional co-benefits such as increased safety, reliability, and resiliency of the system are also achieved (see Table 9). As such, Idaho Power considers co-benefits a part of the evaluation process. Below is a narrative of each mitigation activity, its purpose, estimated near-term cost, additional potential co-benefits of the activity to Idaho Power and its customers, and possible alternatives.

With respect to Idaho and Oregon cost estimates, the estimated costs identified below are grounded in cost assignment between the company's Idaho and Oregon service areas and further informed by anticipated work in the two service areas.

Table 9
Safety, reliability, and resilience co-benefits of wildfire mitigation initiatives

Mitigation Initiative	Safety *Defined as the potential to pose a danger, risk, or injury to life or property*	Reliability *Defined as the ability of the power system to withstand instability, uncontrolled events, cascading failures, or unanticipated loss of system components*	Resiliency *Defined as the ability for the grid system to adapt to, withstand, and quickly recover from disruptive events or changes within the surrounding environment*
Enhanced Vegetation Management	X	X	
Asset Inspections and Corrections	X	X	
Grid Hardening	X	X	X
Undergrounding	X	X	X
Quantifying Wildfire Risk	X		
Situational Awareness–Weather Forecasting, FPI, Weather Stations	X	X	X
R&D	X	X	
Advanced Technologies–Wildfire Detection Cameras	X	X	
Advanced Technologies–Pole Loading	X	X	
Covered Conductor Pilot	X	X	X
Community Programs	X		

4.5.1. Quantifying Wildland Fire Risk

Idaho Power's process for establishing wildfire risk zones is discussed in Section 3 of this WMP.

The first step in developing Idaho Power's WMP was to conduct a comprehensive assessment of the company's service area and transmission corridors. The company worked with a consulting firm that specializes in wildfire risk modeling and fire science to conduct Idaho Power's wildfire risk analysis. The company determined that hiring an external consultant was beneficial for two reasons: 1) an external consultant was more cost effective than hiring additional resources within Idaho Power to perform the modeling, and 2) an outside consultant helped ensure Idaho Power's risk analysis approach aligned with other utilities' practices thus creating a basis for comparison of risk including standard terminology and methodology.

Idaho Power deemed Reax Engineering a qualified consultant to perform wildfire risk analysis based on the work it performed for the California Public Utilities Commission (CPUC) in developing the CPUC Fire Threat Map. Other utilities in Oregon, Idaho, Nevada, and Utah have utilized similar modeling approaches to identify and quantify wildfire risk.

In 2024, Idaho Power began the process of integrating Technosylva Wildfire Analyst Enterprise (WFA-E) software into the company's approach for wildfire risk identification and quantification. WFA-E integration is anticipated to continue throughout the first two quarters of calendar year 2025, with operational capability targeted prior to the start of the 2025 wildfire season.

WFA-E is a cloud-based SaaS platform that provides on-demand wildfire spread prediction capabilities to support operational response, what-if scenario analysis, and wildfire risk forecasting. WFA-E is comprised of a Daily Operational Risk Package, which includes Fire Risk and FireSim Software and Forecast Data, and a Mitigation Planning Package which includes FireSight Analysis and Software.

- **FireSim** provides an on-demand capability within WFA-E to create spread predictions and obtain detailed information on potential impacts within seconds of an incident notification. Impact analysis, including at-risk populations, structures and buildings, critical facilities, and company assets, is automatically undertaken with each prediction—all within less than a minute. This information is critical for infrastructure protection, response, and resource prioritization.

- **FireRisk** integrates advanced weather forecasts with FireSim modeling to perform hundreds of millions of fire simulations daily to derive both current and near-term risk forecasts for customer service territories and critical assets. New forecasts are derived daily intended to provide accurate and timely analysis of possible wildfire events. Baseline risk and consequence metrics are derived by identifying at-risk populations, buildings, and critical facilities that may be impacted. Risk metrics are calculated hourly for infrastructure assets to support possible PSPS de-energization analysis, as well as

emergency operations center activation, stakeholder and public notification, and resource allocation and deployment.

- **FireSight** generates millions of simulations to estimate potential wildfire spread scenarios under varying fire weather conditions across the 600 most significant wildfire days within a 20-year historical weather database. These simulations can then be used to estimate the potential consequences of failure and ignition at the feeder and sub-feeder level, helping to determine the risk associated with assets, and improving the understanding associated with asset hardening decisions that can be prioritized through an RSE analysis and other developed metrics.

The company is also developing a probabilistic model to enhance its wildfire mitigation strategies. With the help of a contractor that specializes in data science and machine learning, Idaho Power plans to incorporate analytics with new and existing data sources to provide greater insight into predicting vegetation hazards. See Section 4.3.1 for more information. Ongoing costs include development and support from the contractor and access to available data sources. Hiring a contractor to develop the model offers several advantages over attempting to create the models in-house. The advantages include specialized expertise, cost-efficiency, time savings, and ability to leverage experience in a tailored approach for wildfire risk analysis. The company expects the development of the model will provide a co-benefit of being able to apply the principles learned to other areas of risk mitigation.

5-Year Cost Estimate for Quantifying Wildland Fire Risk (2025–2029)

Starting in 2025, Idaho Power will utilize the Technosylva WFA-E software to support re-evaluation of wildland fire risk across the Idaho Power service area. The company will also utilize a consultant to develop a VRI for assessing vegetation risk on a real-time basis. Idaho Power estimates system-wide expenditure for these services to be approximately $11.8 million between 2025 and 2029.

4.5.2. Situational Awareness—Weather Forecasting Activities and Personnel

Idaho Power discusses specific situational awareness practices in Section 5 of this WMP.

In 2020, Idaho Power created an FPI tool to support operational decision-making to reduce wildfire threats and risks. The tool takes data on weather, prevalence of fuel (i.e., trees, shrubs, grasses), and topography, and converts that data into an easily understood forecast of the short-term fire threat for different geographic regions in Idaho Power's service area. Since the original development of the FPI, Idaho Power has continued to enhance its meteorological and weather forecasting capabilities to enhance FPI accuracy.

The benefit of developing the FPI and enhancing the company's meteorological forecasting capabilities includes greater situational awareness of Idaho Power's system during critical peak summer months. To continue to generate useful information and system benefits, Idaho Power's situational awareness activities are evaluated and updated annually as necessary to support the company's wildfire preparedness.

The company considers the FPI and related efforts, such as the deployment of fire-weather stations, an essential part of reducing the risk of ignition from work activities. This provides Idaho Power field personnel a tool to assess the fire potential on a consistent basis and across the service area. Given the distinct benefits that result from the FPI and enhanced forecasting capabilities, Idaho Power did not consider alternatives to the development of these critical tools.

In conjunction with the FPI, the incorporation of Technosylva WFA-E will improve situational awareness capability by informing real-time wildfire forecasting and Idaho Power's wildfire simulation capabilities. In 2025, the company will focus on enhancing its weather forecasting capabilities in the context of decision-making for Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS) events. These efforts will consist of three different activities. First, collaborating with the National Center for Atmospheric Research (NCAR) to evaluate and validate ensemble weather forecast data. This process will identify outliers and refine the machine learning methodology used to produce more accurate and reliable forecasts.

Second, the company will expand the number of fire weather stations across its service area. A centralized data platform will be implemented to manage, store, and provide access to weather station data in real time. This platform will allow for real-time visualization of observed weather conditions and offer data download capabilities to support PSPS operations and wildfire mitigation strategies.

Third, all quality-controlled fire weather station data will be integrated into the company's fire risk modeling system to enhance its ability to anticipate and respond to wildfire risks. These advancements in 2025 will build a foundation for future efforts, including the planned adoption of a full ensemble forecasting system in 2026.

5-Year Cost Estimate for Situational Awareness—Weather Forecasting Activities and Personnel (2025–2029)

The estimated expenditure for weather forecasting activities (weather forecasting tools, system development, weather station data services, maintenance, and personnel) is approximately $2.5 million between 2025 and 2029.

4.5.3. Situational Awareness—Advanced Technologies

Technology-based practices incorporated into Idaho Power's Wildfire Mitigation Plan approach include—among others—strategic use of AI-enabled wildfire detection cameras, satellite and aerial imagery to detect vegetation hazards, and pole loading modeling (to assess the structural integrity of poles).

Regarding cameras, the company initiated a pilot project in 2023 to evaluate the use and placement of cameras in strategic locations to enhance situational awareness. With input from state and federal fire responders, Idaho Power developed rigorous evaluation criteria, which includes learning related to AI capabilities in wildfire ignition detection. Multiple camera vendors were considered and evaluated based on potential cost-effective solutions. In 2024,

Idaho Power worked with ALERTWest to install five camera sites in Idaho. Idaho Power is and will continue to work with federal, state, and local agencies to explore the possibility of partnering on the installation and ongoing use of cameras, which may lead to cost sharing and interoperability.

5-Year Cost Estimate for Situational Awareness—Cameras (2025–2029)

The estimated expenditure for the pilot evaluation installation of cameras is $190,000 in 2025. Idaho Power estimates the use of cameras will continue beyond the pilot period and estimates a total system-wide expenditure of $1.6 million from 2025 through 2029. Idaho Power has deployed initial camera installations in Idaho and is currently assessing the need, feasibility, and potential partnership opportunities associated with camera installation in Oregon.

Idaho Power is continuing its pole-loading initiative as part of a pilot project set to run through 2025. This effort involves analyzing the structural integrity of utility poles to ensure they can withstand various forces, such as wind, weight of equipment, and other environmental factors. The lessons learned throughout the pilot have benefitted understanding of loading constraints for poles.

5-Year Cost Estimate for Situational Awareness—Pole Loading Modeling and Aerial Imagery Assessment (2025–2029)

The estimated system-wide expenditure to conduct pole loading modeling and aerial imagery assessment, which includes LIDAR assessment, is $875,000 for 2025 through 2029.

4.5.4. Field Personnel Practices

Idaho Power discusses its field personnel practices in Section 6 of this WMP.

Idaho Power's wildfire mitigation strategy includes procedural measures to reduce potential ignition and spread of wildfires. Idaho Power developed a *Wildland Fire Preparedness and Prevention Plan* (included as Appendix A to this WMP) to provide guidance to Idaho Power employees and contractors. The plan includes information regarding fire season tools and equipment available on the job site; daily situational awareness relative to areas where there is a heightened risk of wildfire; expected actions and mechanisms for reducing on-the-job wildfire risk, as well as reporting requirements in the event of an ignition; and training and compliance requirements.

All Idaho Power crews and certain field personnel and contractors performing work on or near Idaho Power's facilities are required to operate in accordance with the provisions of the *Wildland Fire Preparedness and Prevention Plan* and are expected to conduct themselves in a fire-safe manner. They should be prepared for wildfire by carrying specific tools, including but not limited to, shovels, Pulaskis, and water for initial suppression. Additionally, Idaho Power's PSPS program (included as Appendix B to this WMP) includes employees acting as field observers to report on site conditions as part of the de-energization process. Field observers are equipped with mobile weather kits that include wind meters, compasses, and satellite communication devices to report real-time conditions.

The preparedness of Idaho Power crews and contractors is a vital component of comprehensive wildfire risk reduction practices. The incremental investment in field personnel equipment is focused on additional tools carried by employees working in elevated risk zones. In 2023, Idaho Power joined the International Wildfire Risk Mitigation Consortium (IWRMC), a group whose mission is to share lessons learned, best practices, and innovation in wildfire mitigation. Idaho Power actively participates in monthly workgroup forums for operations and protocols, asset management, vegetation management, and risk management. These workgroup forums inform operational preparedness for wildfire season as well as provide insight into global thinking and advancements in wildfire mitigation.

5-Year Cost Estimate for Situational Awareness—Field Personnel Equipment (2025–2029)

The estimated system-wide expenditure for field personnel equipment (tools, mobile weather kits, and participation in the IWRMC) is $241,000 between 2025 and 2029.

4.5.5. Transmission and Distribution (T&D) Programs for Wildfire Mitigation

Idaho Power's T&D-related wildfire mitigation activities include expanded asset management programs and system hardening efforts, discussed in detail in Section 8 of this WMP. The narratives below provide insight into Idaho Power's consideration and selection of mitigation, technology, and hardening practices.

4.5.5.1. Annual T&D Patrol, Maintenance, and Repairs

Visual inspections are a critical component of T&D line-related wildfire mitigation efforts. On an annual basis, Idaho Power uses helicopters for visual aerial inspection of Western Electricity Coordinating Council (WECC) path transmission lines. Under the WMP, Idaho Power will continue to use this method of line inspection for all transmission lines located in Tier 3 zones. Idaho Power strives to complete these inspections prior to the start of the wildfire season; however, spring weather and snow levels may create access issues and delay the completion until July in some areas.

Distribution lines located within Tier 3 zones are visually inspected on an annual basis to identify defects or conditions that may result in an outage or potential ignition. The patrols are completed by personnel trained in distribution line inspection procedures and with experience in distribution line construction. Targeted defects include those that could pose an immediate threat to the continued operation of the line, including, but not limited to, cracked/broken crossarms, avian nesting hazards, damaged equipment and hardware, floating conductors, and NESC violations. Like visual inspections for transmission lines, Idaho Power strives to complete distribution inspections prior to the start of each wildfire season; however, access issues may delay the completion until July in some areas. Helicopters may not be practical for carrying out distribution patrols due to greater population, and structural and vegetation density. However, there are instances where the company may utilize helicopters on a case-by-case basis to conduct patrols.

In some areas, Idaho Power utilizes unmanned aerial vehicles (UAV) with high-definition cameras to aid in inspections. UAV inspections can complement ground-level inspections. Priority 1 defects are immediately reported and repaired as soon as possible. In 2025, Idaho Power plans to expand the use of UAV inspections and will work to obtain necessary waivers or approvals from the Federal Aviation Administration (FAA), including a Beyond Visual Line of Sight (BVLOS) waiver to allow pilots to operate beyond the direct line of sight. During this time, the company plans to also evaluate the use of UAVs for PSPS patrols.

Idaho Power has expanded the use of overcurrent protection devices (i.e., reclosers) to isolate areas of higher wildfire risk from areas with lower risk. This may include installation of new devices, relocation of existing devices, and/or upgrading remote communication capabilities (i.e., Supervisory Control and Data Acquisition [SCADA]). Circuit segmentation improves reliability for customers outside wildfire risk zones during PSPS or Enhanced Protection Settings (EPS) outage events and improves the capability for Idaho Power to make device changes remotely in real-time when needed.

5-Year Cost Estimate for Situational Awareness—Annual T&D Patrol, Maintenance, Repairs, and Segmentation (2025–2029)

The estimated system-wide incremental expenditure for annual T&D patrols, aerial inspections using drones, maintenance, repairs, and recloser segmentation and advanced relay settings is $6.1 million from 2025 to 2029.

4.5.5.2. Thermography Inspections

While Idaho Power periodically conducts infrared thermography inspections as part of reliability and maintenance programs, the company has expanded these inspections in Tier 3 zones on an annual basis. These inspections are conducted using hand-held and drone-mounted cameras with thermal-sensing technology and can help identify defects associated with the overheating of equipment, connections, splices, or conductors.

As part of the thermography inspections, temperature gradients are analyzed to detect potential problems, and repairs of issues found are prioritized based on their severity. A combination of Idaho Power personnel and contracted resources are used to perform thermography inspections. Idaho Power's thermography technician conducts inspections and coordinates repair activities found by internal and contracted resources. Idaho Power is in the process of training additional Idaho Power staff to perform this function.

Thermography inspections can uncover problems undetectable to the naked eye. From the company's perspective, there is not a viable alternative to this practice. The technology enables more proactive identification of potential issues than would otherwise be possible.

5-Year Cost Estimate for Thermography Inspections (2025–2029)

The estimated expenditure for thermography inspections is $1.2 million from 2025 to 2029. Idaho Power will prioritize the use of this mitigation practice in Tier 3 zones.

4.5.5.3. Wood Pole Fire-Resistant Wraps

To help improve the resiliency of Idaho Power's transmission system, the company wraps wood transmission poles with a fire-resistant mesh in wildfire risk zones. The mesh wrap helps protect the integrity of the pole if it is exposed to fire.

Idaho Power periodically evaluates different products to determine the most cost-effective approach for protecting existing wood poles from fire. Several products have been considered and trialed, including short-term, spray-on and paint-on fire retardants, long-term retardants, and steel wraps. In 2020, the company evaluated a protective mesh wrap and compared the cost and performance to the alternatives. The evaluation found that the mesh wrap was approximately 53% less costly than the alternatives and offered the same level of risk reduction. The decision to use a mesh wrap product was not based solely on cost; other criteria were considered, including availability of the product, ease of installation, expected protective life span, and performance when exposed to fire. By all these measures, fire-resistant mesh was the best solution.

5-Year Cost Estimate for Wood Pole Fire-Resistant Wraps (2025–2029)

The estimated system-wide expenditure for applying fire-resistant mesh wraps to transmission poles in Tier 2 and Tier 3 wildfire risk zones is $1.3 million between 2025 and 2029.

4.5.5.4. Covered Conductor

In 2024, Idaho Power executed a field trial that consisted of the installation of approximately one mile of covered conductor, including both single-phase and three-phase distribution, in a Tier 3 wildfire risk zone near Pocatello, Idaho. The objective of the trial was to understand the feasibility of construction and maintenance, as well as prepare construction standards, identify required material and equipment, and establish safe and efficient work practices for potential future implementation. As part of the 2024 field trial, Idaho Power completed written construction standards for the company and developed and executed a covered conductor installer training program.

This field trial followed successful completion of a trial in Idaho Power's Skills Training Center in 2023, where field employees got hands-on exposure with installing various covered conductor materials and installation tools on an isolated low-voltage system.

Idaho Power is in the process of compiling lessons learned during the field installation. The covered conductor team is additionally analyzing potential co-benefits, including the potential for improved reliability outside of wildfire season and the potential for reduced outage restoration costs. Information gathered during this phase will be used to help inform future implementation approach of covered conductor within Idaho Power's service area.

5-Year Cost Estimate for the Covered Conductor Pilot (2025–2029)

The estimated cost of continuing the pilot in 2025 is $20,000. While this pilot will take place in Idaho, the lessons from it will extend across the company's service area.

4.5.5.5. Fuels Reduction Shared Stewardship Projects

Throughout 2024, Idaho Power participated in multiple, strategic-partner-initiated fuels reduction projects that exhibit potential for reducing wildfire risk adjacent to Idaho Power rights of way (ROW) and wildfire risk zones. The purpose of this effort is to enhance forest resilience to wildfire, decrease hazardous fuel accumulations near Idaho Power infrastructure, and increase powerline resiliency while minimizing the risk of ignitions. Established project partners include Idaho Department of Lands, the U.S. Forest Service (USFS), the U.S. Bureau of Land Management (BLM), the National Forest Foundation, and local counties. Idaho Power serves on a cross-utility shared stewardship committee focused on sharing lessons learned from other western utilities that participate in similar programs and fostering innovation in the wildfire risk reduction space.

5-Year Cost Estimate for Fuels Reduction Shared Stewardship Projects (2025–2029)

The estimated cost of participation in this effort is estimated at $375,000. Idaho Power's monetary investment in fuels reduction is leveraged significantly with state and federal funding.

4.5.5.6. Satellite and Aerial Imagery

Idaho Power's inspection and vegetation management programs include efforts to maintain clearance from vegetation and objects in relation to transmission and distribution lines. To find efficiencies and inspect lines from an aerial perspective, Idaho Power is testing satellite and aerial imagery inspection technologies.

In a pilot project, Idaho Power contracted with a consultant to test the viability of satellite imagery and Geiger-mode LiDAR for finding potential vegetation encroachments along distribution and transmission lines. The resulting analysis and field verification showed the technology still includes random inaccuracies in clearance distances. As a result, the technology was deemed not yet mature enough for Idaho Power's purposes. Idaho Power will continue monitoring satellite and similar technologies for future efficiencies, but currently is not implementing this technology as a program.

Idaho Power also began collecting LiDAR and aerial imagery to analyze all transmission line clearances on lines that had not been previously analyzed in wildfire prone areas. Data was collected and classified through 2024. Idaho Power engineers will be modeling the data and analyzing the imagery for clearances through the summer of 2025. Expenses for this initiative are summarized under section 4.5.3, Situational Awareness – Advanced Technologies.

4.5.6. Enhanced Vegetation Management

Idaho Power's enhanced vegetation management practices are discussed in detail in Section 8.7 of this WMP.

In the initial stage of developing its WMP, Idaho Power conducted an analysis to determine the potential sources of ignition across the company's service area. Reliability data revealed vegetation contact as one of the most common causes of outages on Idaho Power's system. With the goal of eliminating potential ignition sources and to reduce risk, enhanced vegetation management was recognized as an important part of Idaho Power's WMP.

To prioritize risk reduction from vegetation contact, Idaho Power began to work toward a three-year pruning cycle along with enhanced vegetation management practices in Tier 3 and Tier 2 zones. These enhanced practices include pre-fire season vegetation patrols, more targeted pole clearing and vegetation removal, and additional quality assurance for vegetation management practices.

The company considered other vegetation management alternatives, including shorter trimming cycles, longer trimming cycles, and strategies that evaluate each tree individually and only trim it once it has nearly grown back to the power line (known as "just-in-time trimming"). Each alternative presented challenges or resulted in negative impacts that undermined potential benefits.

While shorter trimming cycles result in less vegetation being removed during each trimming cycle, this practice costs more due to the need for more resources and more frequent trimming of trees near the power lines. In contrast, longer cycles result in less frequent trimming of each tree but larger amounts of vegetation that must be removed to maintain larger clearance envelopes around the power lines to accommodate additional years of vegetative growth. Further, longer trimming cycles create logistical challenges exacerbated by tree biology. Some trees simply grow faster than a given trimming cycle will accommodate, and the longer the trimming cycle, the more pervasive this issue may become. Longer cycles that call for heavy pruning may also lead to hormonal imbalances between a tree's canopy and its root system. To correct this imbalance, the tree aggressively re-grows new sprouts to quickly replace its lost canopy. In this regard, heavier pruning results in a faster rate of tree regrowth than normal, making it even more difficult to consistently maintain longer trimming cycles. Finally, "just-in-time trimming" is primarily a reactive strategy that ultimately leads to challenges associated with securing qualified tree-trimming crews, as this ad hoc approach involves hiring crews on an as-needed basis rather than on a consistent schedule. After evaluating these alternative approaches, Idaho Power concluded that the goal of striving to maintain a consistent three-year trimming cycle is the most cost-effective and sustainable strategy to keep vegetation away from the power lines in a proactive manner.

Alternatives to Idaho Power's vegetation management program include conversion of overhead distribution circuits to underground and/or the use of covered conductor in densely treed areas. While undergrounding is used in certain circumstances, widespread undergrounding has

historically not been found to be a cost-effective expense relative to enhanced vegetation management. Similarly, while covered conductor may be appropriate in certain circumstances, widespread deployment is not considered to be a feasible alternative to the enhanced vegetation management program. That said, the company continues to evaluate and implement underground solutions and advance its learnings in covered conductor applications, as appropriate, and as part of its WMP circuit hardening efforts.

Although vegetation management is a sizeable increased wildfire mitigation expense, performing this work has notable long-term co-benefits, including reduced vegetation-caused outages in Tier 3 and Tier 2 risk zones. For example, during the 2023 wildfire season Idaho Power's service area experienced above average number of storm events, high winds, and lightning compared to previous years. While storm activity was higher, outages associated with vegetation fell by 27% compared to previous years—indicating that the company's vegetation management practices are reducing risk. Idaho Power continues to monitor performance and outage metrics to confirm the success of the enhanced program.

5-Year Cost Estimate for Vegetation Management (2025–2029)

The estimated system-wide expenditure for vegetation management is at least $234 million from 2025 to 2029. However, given recent escalations in vegetation management costs across the U.S., this figure could increase as Idaho Power continues to strive to meet its cycle and Enhanced Vegetation Management Program targets.

4.5.7. Communications and Information Technology Customer Notification Enhancements

Idaho Power's efforts to communicate with customers and the public about wildfire and mitigation are discussed in detail in Section 10 of this WMP.

Idaho Power considers communication a vital part of its wildfire mitigation efforts. Communication expenses related to customer and community educational outreach include advertisements, print media, social media, and public meetings. The purpose of these communications is to keep customers aware of mitigation and fire-related activities before, during, and after fire season.

Each year, the company conducts several education campaigns around wildfire including promoting the company's wildfire mitigation activities and work within communities, providing awareness and education on preparing for wildfire season, and publicizing ways customers can reduce fire-ignition potential. The communication is necessary to ensure all customers, whether they reside wildfire risk zones or not, are aware and educated about PSPS, how the company will make such decisions, and how customers will be alerted and impacted in such events.

Each year, public meetings are held through various formats, including formal presentations, open-house-like events, community-based organization collaborations, and virtual town halls throughout the company's service area. Topics include review of the WMP,

communication during a PSPS, wildfire prevention, and emergency outage preparedness. The open-house-like events generally provide the best opportunities to engage with customers.

During PSPS and wildfire events, Idaho Power utilizes communication and event management tools, including dedicated Idaho Power employees focused on ensuring consistent and accurate communication, to effectively manage the events and communicate with customers. The 2024 wildfire season, and related PSPS activity, highlighted the need for the company to evaluate fresh solutions for customer communication and streamline event workflows. The review resulted in a plan to implement an application to provide situational awareness, event tracking from initiation through restoration, and automated notifications through integration with the company's Outage Management System and Communication Tool. This application will consolidate disparate data sets (fire potential, weather, asset, and other data) in a geographic display to provide visibility into our forecasted fire risk, allowing timely and accurate decision making. It will also provide a way to track the status of wildfire zones and devices as it relates to PSPS events, providing visibility to internal resources that need to take corresponding action, triggering timely communication to impacted customers, and storing that information for future reporting and analysis. The company anticipates this application will require ongoing maintenance and support as included in the associated O&M estimates.

5-Year Cost Estimate for Communication and Customer Notification Enhancements (2025–2029)

The estimated system-wide expenditure for communication expenses is $3.1 million from 2025 to 2029.

4.5.8. PSPS Emergency Preparedness and Technology

Idaho Power carries out emergency operations during PSPS events or when wildfires threaten infrastructure to ensure public safety, protect critical assets, and minimize disruptions. The operations are crucial for proactive risk management and coordinated response with public safety partners and fire agencies. During these events, the company works to minimize the impacts of PSPS and wildfire-related outages on customers as appropriate, including by opening community resource centers (CRC) when the company deems them necessary. The company may partner with county and local emergency managers to coordinate CRCs at accessible locations, helping to enhance community resilience and potentially decrease the hardships associated with outages.

When warranted during PSPS and wildfire events, Idaho Power has begun to utilize a dedicated wildland fire engine and firefighting personnel in certain situations to support on-the-ground safety and infrastructure protection. The personnel protect critical infrastructure and provide situational awareness and coordination within the incident command structure during an event and help to safeguard utility crews working on restoration activities.

The company also utilizes a standby helicopter service to quickly perform pre-storm patrols and survey de-energized or damaged powerlines following a PSPS or wildfire. The use of a helicopter enhances Idaho Power's ability to assess risks, ensure safety, and expedite power restoration, aligning with our goal to continuously strive to decrease impacts of PSPS and

wildfire for customers. A standby contract structure is needed because Idaho Power has experienced challenges with helicopter availability during the summer months as local helicopter resources may be consumed as part of fire response efforts throughout the region. Idaho Power tested a 6-week standby contract structure in 2024 and intends to evaluate a longer standby service structure in 2025.

5-Year Cost Estimate for PSPS Emergency Preparedness and Technology (2025–2029)

The estimated system-wide expenditure for PSPS emergency preparedness and technology is $3.9 million from 2025 to 2029.

4.5.9. Incremental Capital Investments

Idaho Power's wildfire mitigation efforts include capital investments in system hardening practices, many of which also provide co-benefits to the company. Capital investment programs and five-year forecasts are summarized in Table 10. Section 8.4.7.3 additionally summarizes transmission line rebuild projects planned over the next five years. These projects improve reliability for customers and increase resiliency of the transmission system from wildfire.

Idaho Power's capital investments for wildfire mitigation are discussed in detail in Section 8 (T&D Asset Management Programs) of this WMP.

Table 10
WMP forecasted capital investments

Wildfire Mitigation Forecasted Capital Investments, $000s*										
Mitigation Program	Description of the Program	Risk Reduction Benefit	2025 Planned In Service	2026 Planned In Service	2027 Planned In Service	2028 Planned In Service	2029 Planned In Service	5-Year Planned In Service Total	5-Year Total Idaho	5-Year Total Oregon
Overhead Primary Hardening Program	Systematic replacement and upgrades of hardware and equipment	Reduced potential of equipment failure, utilizing material and equipment with less energy release and potential of ignition, increased resiliency	$11,970	$15,004	$17,951	$20,201	$23,656	$88,782	$82,128	$6,654
Strategic Undergrounding	Select conversion of overhead to underground conversion in Red Risk Zones	Reduce exposure and potential of ignition by locating power lines underground	$2,200	$5,693	$7,070	$12,195	$12,622	$39,780	$38,518	$1,262
Recloser Segmentation and Communication Upgrades	Installation, relocation, and expanded communication for Automatic Reclosing overcurrent protection devices	Isolate circuit segments and improve reliability for enhanced protection settings and PSPS	$2,000	$1,000	$1,000	$1,000	$1,000	$6,000	$5,480	$520
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	Provides early fire detection, faster response time for suppression activities	$95	$95	$-	$-	$-	$190	$120	$70
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	Provides ability to model and forecast fire potential and severe weather conditions for FPI and PSPS	$1,602	$1,004	$82	$85	$87	$2,860	$2,622	$238

*These are estimates only. The costs may increase or decrease due to such factors as inflation or scope changes.

4.5.9.1. Circuit Hardening

Idaho Power estimates spending approximately $89 million from 2025 through 2029 on circuit hardening and infrastructure upgrades across its system.

Idaho Power's WMP includes an overhead distribution hardening program for Tier 3 zones. The program includes systematic replacement of hardware, equipment, and materials to improve safety and reliability and reduce ignition risk. The first five years of the program have and continue to be focused on circuits in Tier 3 zones. The company reviews hardening outcome metrics annually relative to risk reduction and reliability and will assess outcomes to assist in the determination on whether to expand the program into additional areas.

Prior to developing its WMP, Idaho Power successfully implemented many of the same hardening measures detailed below as part of the company's reliability program. On average, outage data and analytics showed customer outages were reduced by approximately 38% in areas where hardening projects were carried out. With the success of reducing outages, many of these same activities used to increase reliability were chosen to be part of the WMP to reduce ignition potential in Tier 3 zones.

Hardening activities and equipment identified in the WMP were evaluated by patrolmen, troublemen, reliability engineers, and the company's Methods and Materials department to determine cost-effective solutions that balance overall costs with expected risk reduction.

As an alternative to conducting circuit hardening upgrades, the company considered converting overhead distribution circuits to underground. While underground conversions of the distribution system are used in certain circumstances, the upfront cost is estimated to be 2 to 10 times higher than the cost of carrying out hardening work. In general, overhead hardening efforts provide the benefit of being able to impact a greater number of circuit miles and customers in a shorter time horizon with less upfront investment than undergrounding. Additionally, the company is piloting covered conductor as another alternative to traditional overhead hardening. This pilot program is helping Idaho Power identify technical challenges, such as compatibility with existing infrastructure and installation and maintenance requirements. The insights gained are refining the company's designs, construction standards, and processes for broader implementation. Through this pilot, Idaho Power plans to assess how each mitigation strategy reduces wildfire risk relative to its cost, labor, and time requirements, helping inform risk-based decisions when comparing, selecting, and prioritizing mitigation strategies for the future.

The following summarizes the incremental capital investments the company is making to harden its system and further reduce wildfire risk. These hardening activities are implemented on a rolling basis over the course of multiple years consistent with internal prioritization analysis and scheduling. Overhead distribution infrastructure located in Tier 3 zones is analyzed, inspected, and hardened as appropriate utilizing the strategies below depending on inspection

findings, proximity to fuels that may be conductive to wildfires, and risk model data. Idaho Power plans to complete 90 miles of distribution system hardening in 2025.

- **Spark Prevention Units—**Porcelain arresters used for overvoltage protection are changed out with arresters utilizing spark prevention units (SPU). The SPU eliminates the potential of failure during arrester operation. All distribution arresters on primary distribution lines in Tier 3 zones are scheduled for replacement by 2027.

- **Fiberglass Crossarms—**Idaho Power's hardening program includes replacement of wood crossarms with fiberglass, including the installation of both tangent and dead-end fiberglass crossarms in Tier 3 zones.

- **Small Conductor**—Idaho Power has analyzed the possible risk associated with small conductor relative to the potential for breakage. As a result of this exercise, Idaho Power has targeted overhead distribution conductor smaller than #4 ACSR (copper and 3SS conductor), which includes approximately 60 miles or more in Tier 3 zones. Conductor losses were analyzed and showed replacing the conductor will result in an approximately 50% reduction of line losses, resulting in co-benefits for the company and customers in terms of greater reliability and line loss improvements.

- **Porcelain Switches**—Idaho Power's Outage Management System (OMS) and feedback from field personnel revealed potential benefits of switches made from material other than porcelain. Therefore, porcelain switches installed in Tier 3 zones will be changed out with cutouts featuring Ethylene Propylene Diene Monomer Rubber (EPDM). Idaho Power's Methods and Materials department trialed different cutout switches made of different material, including silicone and polymer, to find the most cost-effective and reliable solution. The results of the trial highlighted the potential for avian issues with silicone (i.e., ravens tended to eat the silicone), and the cost of EPDM versus polymer was nearly equivalent. The financial analysis determined EPDM would preserve the integrity of the insulator body, prevent outages, and provide an estimated savings of $10,798 per year over silicone.

- **Avian Protection**—Idaho Power employs several different protection measures the protect wildlife including, but not limited to, covers, insulated conductor, diverters, perches, nesting platforms, and structural modifications, as appropriate. The company has an extensive history working with manufacturers of animal guards/covers and regularly seeks new solutions for avian issues to prevent mortalities, increase reliability, and eliminate other risks. The company's Avian Protection Plan (APP) was developed in the mid-2000s, and many of the practices identified in the APP are used for wildfire mitigation in Tier 3 and Tier 2 zones. For example, new wildlife guards were recently developed and installed in conjunction with the installation of new power fuses and SPUs. Idaho Power consulted with different manufacturers to develop new products to accomplish the dual goals of avian protection and wildfire mitigation. Solutions are

determined on a case-by-case basis depending on the specific location, the type and extent of avian presence, and other relevant factors.

4.5.9.2. Overhead to Underground Conversions

An aspect of Idaho Power's system hardening program is the select conversion of overhead to underground distribution lines in wildfire risk zones. Areas selected for underground conversion are based on the results of risk quantification and modeling work, feedback from local fire officials, fire history, PSPS likelihood based on historic weather conditions, and consideration of infrastructure access and public egress. In 2024, the company identified seven miles of overhead powerlines for underground conversion through 2026 and began developing designs.

5-Year Cost Estimate Overhead to Underground Conversions (2025–2029)

Idaho Power estimates spending approximately $40 million from 2025 through 2029 on converting overhead distribution circuits to underground construction.

4.5.9.3. New Underground Construction

Customer growth and new developments in wildland urban interface (WUI) areas present challenges for Idaho Power when working to decrease wildfire risk. As people increasingly move into areas with more wildfire risk, the company faces the dual challenge of expanding infrastructure to serve customers while remaining mindful of wildfire risk. Additionally, underground systems are less affected by extreme weather conditions, such as strong winds, falling trees, and lighting, and provide a greater level of resiliency and risk reduction. As a result, Idaho Power will evaluate new developments to determine if near-term risk levels warrant underground construction at the onset of a project; specifically, the company may consider a new development's location, wildland fuels, suppression and response capabilities, and egress/ingress routes when determining if underground construction is warranted. The risk reduction benefits, and cost of underground construction will be explored in each instance, and the company may choose to pay the difference between new overhead construction and underground at its discretion.

5-Year Cost Estimate for Underground Construction (2025–2029)

Idaho Power estimates spending approximately $15 million from 2025 through 2029 on new underground construction in wildfire risk zones. This amount will ultimately be dictated by new development activity in wildland urban interface or wildfire prone areas.

4.5.9.4. Recloser Segmentation

Segmentation is a strategy involving the placement of overcurrent protection devices, called reclosers, to isolate or segment areas of higher wildfire risk from areas with lower risk. The goal of segmentation is to improve the reliability for customers outside wildfire risk zones by limiting their exposure to PSPS and EPS events. Reclosers provide a point of de-energization for PSPS and are also used to implement EPS on days having higher fire potential to limit the

risk of ignition. Segmentation work includes installing new SCADA-operated reclosers, upgrading existing reclosers with communications and SCADA control, or relocating existing reclosers.

5-Year Cost Estimate for recloser segmentation (2025–2029)

Idaho Power estimates spending approximately $6 million from 2025 through 2029 on the installation, relocation, and communication upgrade of reclosers.

4.5.9.5. Transmission Steel Poles

Idaho Power's transmission construction standards utilize steel poles and structures for new line construction at voltages of 138-kV and above. This approach is designed to enhance wildfire mitigation, improve transmission line resiliency, reduce future rebuilding costs after fire events, and ensure greater reliability for customers. While steel poles are the preferred choice, IPC may exercise its discretion to utilize wood poles when the use of wood poles is more feasible than steel poles, including based on factors such as limited supply or availability of steel poles, engineering specifications, right-of-way constraints, permitting requirements, and project timelines.

4.5.9.6. Line Monitoring Technology (Pilot)

As part of Idaho Power's ongoing commitment to enhancing wildfire mitigation strategies, the company will begin a pilot project incorporating line monitors into its distribution system in wildfire prone areas. This innovative initiative underscores Idaho Power's dedication to enhancing grid reliability, safety, and operational efficiency, particularly in areas with elevated wildfire risk.

Line monitors are devices installed on overhead powerlines that use advanced sensing technologies to provide real-time data about the condition and performance of the electrical grid. The integration of line monitors into wildfire mitigation efforts may provide multiple benefits including fault detection, historical perspective on fault locations, and transient capture capabilities. As part of the pilot, Idaho Power will begin leveraging their advanced capabilities, to help address potential risks proactively.

2-Year Cost Estimate for the Line Monitor Pilot Project (2025-2026))

Idaho Power estimates spending approximately $385,000 from 2025 through 2026 on the installation of line monitors.

5. Situational Awareness

5.1. Overview

Visibility and readily available access to current and forecasted meteorological conditions and fuel conditions is a key aspect of Idaho Power's wildfire mitigation strategy. Meteorological and fuel conditions can vary significantly across Idaho Power's service area. Idaho Power leverages its internal Atmospheric Science department's modeling/forecasting capabilities, its existing fire weather stations, and publicly available weather/fuel data to develop projections of current and future wildfire potential across Idaho Power's service area. This wildfire potential information is then available to operations personnel to factor into operational decision-making.

5.2. Fire Potential Index

Idaho Power has developed a Fire Potential Index (FPI) tool based on original work completed by San Diego Gas and Electric (SDG&E), the National Forest Service, and the National Interagency Fire Center (NIFC) and modified for Idaho Power's Idaho and Oregon service area. This tool is designed to support operational decision-making to reduce fire threats and risks. This tool converts environmental, statistical, and scientific data into an easily understood forecast of the short-term fire potential, which could exist for different geographical areas in the Idaho Power service area. The FPI is issued for a seven-day period to provide for planning of upcoming events by Idaho Power personnel.

The FPI reflects key variables, such as the state of native vegetation across the service area ("green-up"), fuels (ratio of dead fuel moisture component to live fuel moisture component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned a numeric value, and those individual numeric values are summed to generate a Fire Potential value from 0 to 16, each of which expresses the degree of fire potential expected for each of the 7 days included in the forecast. The FPI scores are grouped into the following index levels:

- **Green**: FPI score of 0 through 11 indicates lower potential for a large fire to develop and spread, as there is normal vegetation and fuel moisture content as well as weak winds and high relative humidity.

- **Yellow**: FPI score of 12 through 14 indicates an elevated potential for a large fire to develop and spread, as vegetation and fuel moisture content are below normal, along with moderate winds and lower than normal relative humidity.

- **Red**: FPI score of 15 through 16 indicates a higher potential for a large fire to develop and spread, as vegetation and fuel moisture content are well below normal, along with strong winds and low relative humidity.

Fire Potential Index (FPI) Category			
	Normal	Elevated	Higher
FPI Range	0 to 11	12 to 14	15 to 16

The state of native grasses and shrubs, or the **Green-Up Component**, of the FPI is determined using satellite data for locations throughout Idaho Power's areas of interest. This component is rated on a 0-to-5 scale ranging from very wet (or "lush") to very dry (or "cured"). The scale is tied to the Normalized Difference Vegetation Index (NDVI), which ranges from 0 to 1, as follows:

Green-Up Component						
NDVI	Very Wet/Lush: 1.00 to 0.65	0.64 to 0.60	0.59 to 0.55	0.54 to 0.50	0.49 to 0.40	Very Dry/Cured 0.39 to 0.00
Score	0	1	2	3	4	5

The **Fuels Component (FC)** of the FPI measures the overall state of potential fuels that could support a wildfire. Values are assigned based on the overall state of available fuels (dead or live) for a fire using the following equation:

FC = FD / LFM

Where FC represents Fuels Component in the scale below, FD represents 100-hour Dead Fuel Moisture (using a 1-to-3 scale), and LFM represents Live Fuel Moisture (percentage). This data will be collected from satellite sources and regional databases supported by state and federal agencies.

The product of this equation represents the fuels component reflected in the FPI as follows:

Very Wet					Very Dry
0	1	2	3	4	5

The **weather component** of the FPI represents a combination of sustained wind speeds and dew-point depression as determined using the following scale. This data is sourced from the

WRF products produced by Idaho Power using its High-Performance Computing system. In addition to the HPC-system-produced WRF data, several national level meteorological products are used. These products include regional weather observations used to validate model information.

Dewpoint Depression/Wind	≤5 mph	6 to 11 mph	12 to 18 mph	19 to 25 mph	26 to 32 mph	≥33 mph
≥50ºF	4	4	4	5	5	6
40ºF to 49ºF	3	3	4	4	5	5
30ºF to 39ºF	3	3	3	4	4	5
20ºF to 29ºF	3	3	3	3	3	4
10ºF to 19ºF	2	2	2	2	2	3
<10ºF	0	1	1	1	1	2

5.3. FPI Review and Evaluation

The FPI process is reviewed annually after completion of the fire season with consultation of interested parties (e.g., Load Serving operator, line crews, and others). Evaluation of the FPI process is used to assess and validate Idaho Power's wildfire preparedness approach.

5.4. Forecast Ensemble

In 2024 Idaho worked with the National Center of Atmospheric Research (NCAR) to begin development of a multi-model ensemble of atmospheric models focused upon providing a higher level of accuracy and precision of forecasts (both spatial and temporal) while also allowing for the development of probabilities for when, where, and what magnitude of events may occur by being able to better account for the variability between model realizations and other atmospheric and environmental complexities. Additionally in 2025 Idaho Power upgraded its High Performance Computing system's computing capabilities to run the multi-model ensemble. In 2025 IPC will continue working with NCAR to complete calibration and verification of the ensemble forecasting system with full implementation in Idaho Power's fire weather forecasting process expected to occur in 2026.

6. Mitigation—Field Personnel Practices

6.1. Overview

A component of Idaho Power's wildfire mitigation strategy is to prevent the ignition and spread of wildfires due to employee work activities. Idaho Power developed the *Wildland Fire Preparedness and Prevention Plan* (Appendix A) to provide guidance to Idaho Power employees and contractors working in locations and under conditions where there is a heightened risk of wildfire. All Idaho Power crews and certain field personnel performing work on or near Idaho Power's facilities are expected to operate in accordance with the Plan and continue to conduct themselves in a fire-safe manner.

6.2. Wildland Fire Preparedness and Prevention Plan

The *Wildland Fire Preparedness and Prevention Plan* informs Idaho Power personnel and its line construction contractors about the following factors:

- Annual fire season tools and equipment to be available when on the job site
- Daily situational awareness, including weather conditions, regarding locations where there is a heightened risk of wildfire
- Expected wildfire ignition prevention actions while working, and reporting instructions in the event of fire ignition
- Training and compliance requirements

7. Mitigation—Operations

7.1. Overview

A component of Idaho Power's wildfire mitigation strategy is to continue safe and reliable operation of its transmission and distribution (T&D) lines while also reducing wildfire risk. These operational practices primarily center around the following:

- Temporary operating procedures for transmission lines during the fire season.
- Temporary operating procedures for distribution lines in wildfire risk zones during the fire season.
- An operational strategy for T&D lines during periods of elevated wildfire risk during the fire season
- A public safety power shutoff (PSPS) strategy for Idaho Power's service area and transmission corridors

7.2. Operational Protection Strategy Definitions

Operational protection strategies were developed to reduce the probability of ignition during fault events on Idaho Power's distribution system. Starting in 2024, the company implemented a pilot distribution protection strategy during the wildfire season consists of two modes:

1) Enhanced Protection Settings (EPS) Mode 1
2) Enhanced Protection Settings (EPS) Mode 2

Enhanced Protection Settings (EPS) are enabled in automatic reclosing (AR) protective devices on feeders protecting high-risk fire zones. AR protective devices include feeder relays (at head end of feeder) and reclosers. The definitions of the various protection modes are as follows:

EPS Mode 1: Auto-reclose turned off. This allows only a single trip, which eliminates traditional re-energizations to test the line, reducing chances of fire ignitions.

EPS Mode 2: Auto-recloser turned off and trip settings set to instantaneous lockout. This is a much more sensitive setting that will cause the AR device to lockout prior to most fuses. Mode 2 is designed to minimize the fault energy, further reducing the risk of fire ignition.

See section 7.4 and 7.5 for information on how and when EPS is applied.

The company plans to continue to evaluate and evolve protections schemes and strategies. Lessons learned from benchmarking and data analysis will continue to be used to inform Idaho Power's system protection strategies.

7.3. Transmission Line Operational Strategy

7.3.1. Fire Season Temporary Operating Procedure for Transmission Lines 115 kilovolt (kV) & Above

Each year, typically in May, leadership within Idaho Power's Load Serving Operations (LSO) department updates and issues its Fire Season Temporary Operating Procedure. The purpose of this temporary operating procedure is to provide LSO employees with guidelines for operating transmission lines during the summer fire season. The procedure aims to reduce wildfire risk through practices relating to information collection, notification, and procedures for testing/closing in on locked-out transmission lines.

7.3.2. Tier 3 Zone Transmission Operational Strategy 69 kV & Below

During wildfire season, Idaho Power determines a daily FPI as described in Section 5 of this WMP. The FPI informs the transmission line operational strategy for those lines owned, operated, and located in Tier 3 zones. These lines will be operated in normal settings mode but with no "testing"[19] of a line that may have "locked out" during the time of a red FPI. In the event of a fault on the specified transmission line(s) during a red FPI, the line will operate as normal and may "lock out," at which time the line(s) will either need to be patrolled before "testing" or wait until the FPI level drops out of the red category prior to being re-energized.

7.4. Distribution Operational Strategy and EPS

During wildfire season, Idaho Power determines a daily FPI as described in Section 5 of this WMP. The FPI informs the distribution line operational strategy for those lines located in and adjacent to wildfire risk zones. EPS settings are activated remotely from our Distribution Control Center when remote control is available through Supervisory Control and Data Acquisition (SCADA). When SCADA control is not available on an AR device, qualified company personnel must enable the EPS modes manually at the AR device. EPS settings—both Mode 1 and Mode 2—are activated by wildfire risk zone at each of the AR devices protecting the zone.

[19] Transmission line "testing" refers to the human act of re-energizing a line without completing a physical field patrol or observation of a line.

EPS Mode 1 turns off auto reclosing. This allows only a single trip, which eliminates traditional re-energizations to test the line, reducing chances of arcing and sparking. EPS Mode 1 is generally operated as a seasonal setting. It is activated when fuel conditions reach a reach a cured state resulting in increased fire potential. Mode 1 remains in effect until fuel conditions change and there is decreased fire potential as established by the company's Atmospheric Science team.

EPS Mode 2 involves auto-reclosing turned off and trip settings set to instantaneous lockout. This is a much more sensitive setting that will cause the automatic reclosing device to lockout prior to most fuses. Mode 2 is designed to minimize the fault energy, further reducing the risk of arcing and sparking. Mode 2 is enabled on SCADA and non-SCADA AR devices protecting wildfire risk zones during days of higher fire potential. The criteria to activate Mode 2 generally includes a forecasted FPI of 15 or higher (red) and meeting or exceeding zone-specific wind criteria established for each zone based on historic climatology. Mode 2 may be enabled on a case-by-case basis for other factors, including, but not limited to, if the National Weather Service issues a Red Flag Warning that covers a wildfire risk zone(s).

Mode 2 applies only to AR devices that have fast trip or instantaneous trip capability. Not all AR devices protecting wildfire risk zones currently have this capability. The company has initiated a multi-year project to upgrade all AR devices impacting wildfire risk zones with EPS Mode 2 capability and SCADA controls. Table 1, located in the Executive Summary, details 2025 goals for upgrades.

7.5. PSPS

7.5.1. PSPS Definition

PSPS, as used in this WMP, is defined as the proactive de-energization of electric transmission and/or distribution facilities during extreme weather events to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. The concept is as follows—if extreme weather events can be predicted far enough in advance, the resulting proactive line de-energization before the forecasted weather conditions materialize could mitigate the risk of a wildfire caused by Idaho Power's electric transmission and/or distribution facilities. A PSPS event can result in customer impact and generates extensive planning and strategy leading up to, during, and after a PSPS event.

PSPS is not the practice of de-energizing lines in the following types of situations:

- Unplanned de-energization of lines required for emergencies and during outage restoration situations.
- Planned line or station work activities that require a planned outage (Idaho Power currently has a planned outage customer notification process in place for this).

- Reactive de-energization of electric transmission and/or distribution facilities, which may be either at Idaho Power's determination or at the request of fire managers (e.g., Bureau of Land Management [BLM], U.S. Forest Service, or other fire-fighting managers) in response to existing/encroaching wildfire threatening to burn into such facilities.

- Automated de-energization of electric transmission and/or distribution facilities due to smoke/fire from an existing fire causing a fault on the line.

Idaho Power will continue its current de-energization practices in the above referenced, and comparable situations. Such outage situations are not defined as PSPS events in the context used here and, as a result, would not trigger PSPS protocols.

7.5.2. PSPS Plan

Idaho Power developed a PSPS Plan (see Appendix B) that operates in parallel with its wildfire mitigation strategy. Although the wind patterns in Idaho Power's service area are generally of a much lower sustained velocity and often less predictable (i.e., micro-bursts) than other utilities' service areas where PSPS has most frequently been utilized (i.e., California), the company's PSPS Plan generally follows industry best practices by considering other utilities' PSPS plans and incorporating wildfire risk and other considerations specific to Idaho Power's service area. While a PSPS event is more probable in wildfire risk zones, Idaho Power retains the ability to utilize PSPS anywhere throughout the service area. The decision regarding PSPS is based on several dynamic factors, and each weather event is unique.

8. Asset Management and Inspection Initiatives

8.1. Overview

Idaho Power's wildfire mitigation strategy relies in part on its various asset management programs, including asset inspections, to maintain safe and reliable operation of its transmission and distribution (T&D) facilities in reducing wildfire risk.

8.2. T&D Asset Management and Inspections

Idaho Power implements and continuously evaluates a set of asset management and inspection initiatives. Fundamental to these efforts is the continual research into industry best practice and strategic piloting of emerging technologies and approaches to complement and improve Idaho Power's core asset management strategy. Idaho Power's approach for supporting wildfire prevention and mitigation through asset management and inspection initiatives is summarized in Table 11 and subsequently detailed throughout this section. Table 12 provides detail on Idaho Power's assets relative to wildfire risk zones.

Table 11
Asset management and inspection initiatives

Wildfire Mitigation Asset Management Inspection Initiatives	
Transmission	**Distribution**
Aerial Visual Inspection Program	Ground Detail Inspection Program (enhanced)
Ground Visual Inspection Program	Wood Pole Inspection and Treatment
Detailed Visual Inspection Program	Wood Pole Fire Protection Program
Wood Pole Inspection and Treatment Program	Line Equipment Inspection Program
Cathodic Protection and Inspection Program	Thermal Imaging Inspections
Thermal Imaging Inspections	Overhead Primary Hardening Program
Wood Pole Wildfire Protection Program	
Steel Pole Program	

Table 12
Service area asset overview[20]

Type of Equipment	Total Idaho	Tier 3 Idaho	Tier 2 Idaho	Total Oregon	Tier 3 Oregon	Tier 2 Oregon
Substations	294	9	11	44	-	2
Power Generation Facilities	19	-	-	3	-	-
Overhead Transformers	120365	6722	5588	10209	295	322
Reclosers	1078	60	35	138	2	2
Voltage Regulators	1226	70	45	128	3	0
Capacitor Banks	1707	22	30	79	1	-
Wood Poles (transmission)	31,390	530	1,850	7,222	-	200
Steel Poles (transmission)	9697	197	814	646	-	1
Transmission Towers	2,369	144	227	166	-	1
Overhead Expulsion Prevention Line Fuses*	49283	2139	1925	2268	45	62
Overhead Standard Line Fuses*	3449	117	130	181	2	2

**Counted as individual fuses*

8.3. Inspection and Correction Timeframes

Asset management inspections allow personnel to look for potential defects, which, if found, are documented, categorized, and scheduled for repair based on priority designation.

Quality assurance inspections for new construction are performed annually across the service area to enhance the safety of the public and verify the quality of new construction is consistent with the National Electrical Safety Code (NESC). Work orders are randomly selected for inspection, and deficiencies are recorded and corrected based on the priority level. The results of the inspections are shared with regional field workers to help foster learning and ensure construction meets current standards. In addition to randomly selected inspections, thermography technicians also perform annual inspections in Tier 3 zones, providing a degree of quality assurance for previous inspections.

Idaho Power continues to evaluate the use and efficiency of emerging and alternative technologies to supplement detailed ground inspection. In 2025 Idaho Power plans to expand

[20] - See Table 5 for overhead conductor line miles.

the use of unmanned aerial vehicle (UAV) inspections and will work to obtain necessary waivers or approvals from the Federal Aviation Administration (FAA), including a Beyond Visual Line of Sight (BVLOS) waiver to allow pilots to operate beyond the direct line of sight, possibly enhancing the efficiency of inspections.

Table 13 summarizes Idaho Power's inspection initiatives and frequency with respect to wildfire risk zones.

Table 13
Summary of asset inspections and schedules by state and zone

Asset Inspection Type	Inspection Interval					
	Idaho Non- Risk Zone	Oregon Non- Risk Zone	Idaho Tier 2	Oregon Tier 2	Idaho Tier 3	Oregon Tier 3
Transmission Defect Inspections						
Visual*	Annually	Annually	Annually	Annually	Annually	Annually
Detailed	10 Years	10 Years	10 Years	10 Years	10 Years	10 Years
Groundline (Wood Pole Test and Treat)	10 Years	10 Years	10 Years	10 Years	10 Years	10 Years
Infrared Patrol	None	None	None	None	Annually	Annually
Distribution OH Defect Inspections						
Visual/Detailed*	3 Years	2 Years	3 Years	2 Years	3 Years	2 Years
Groundline (Wood Pole Test and Treat)	10 Years	10 Years	10 Years	10 Years	10 Years	10 Years
Wildfire Mitigation/Potential Ignition Source Patrol*	None	None	None	Annually	Annually	Annually
Infrared Inspections	None	None	None	Annually	Annually	Annually

*Includes Ignition Prevention Inspection consistent with Oregon Administrative Rules in Chapter 860, Division 24.

8.4. Transmission Asset Management and Inspection Initiatives

Idaho Power's transmission asset management inspections programs include condition-based aerial visual inspections, ground visual inspections, detailed visual (generally using high-resolution photography) inspections, transmission wood pole inspection and treatment, and cathodic protection.

8.4.1. Aerial Visual Inspection Program

Annually, Idaho Power uses helicopters to assist qualified Idaho Power personnel in the aerial visual inspection of transmission lines identified as Western Electricity Coordination Council (WECC) Path Lines. This method of line inspection is also part of Idaho Power's Wildfire Mitigation patrols and is used on an annual basis pre-wildfire season for non-WECC transmission lines located in Tier 3 zones. UAVs with high-definition cameras are also being used in certain situations to inspect facilities on these lines.

8.4.2. Ground Visual Inspection Program

Annually, qualified Idaho Power personnel (i.e., trained in transmission line inspection procedures and experienced in transmission line construction) complete ground visual inspections of all transmission lines. Ground patrols are completed using four-wheel-drive vehicles, all-terrain vehicles (ATV), utility terrain vehicles (UTV), and/or on foot. These inspections support the identification of potential line defects that are documented and scheduled for repair based on defect classification.

8.4.3. Detailed Visual (High-resolution Photography) Inspection Program

In addition to the annual inspections and associated maintenance, Idaho Power also completes detailed visual inspections generally utilizing high resolution photography. This inspection is typically completed using helicopters, UAVs, and contracted professionals operating high-definition cameras. If potential line defects are noted, they are scheduled for repair consistent with defect classification. The detailed visual inspections are completed on a 10-year cycle in conjunction with the 10-year cycle of wood pole ground line inspection and treatment.

8.4.4. Thermal Imaging (Infrared) Inspections

Idaho Power annually inspects transmission lines and equipment within Tier 3 zones using thermal imaging (infrared) cameras. Compromised electrical connections and overloaded equipment may be identified using thermal imagery. Identified risks will be prioritized and mitigated consistent with defect classification.

8.4.5. Wood Pole Inspection and Treatment Program

All wood poles are visually inspected, sounded, and bored for defects and decay on a 10-year cycle. Poles are categorized according to the following:

- **Reported**: Any wood pole inspected and found to be installed within 10 years of the manufactured date or last inspection date.
- **Treated**: Any wood pole inspected and found to be installed 11 years or more prior to the inspection date and determined to be in sound enough condition to warrant treatment.
- **Rejected**: Any wood pole determined to fit the following criteria:
    - Has less than 4 inches of shell at 48 inches above the ground line; or
    - Less than 2 inches of shell at 15 inches above the ground line; or

- Less than 2 inches of shell at the ground line; or
- Is deteriorated and does not meet minimum strength criteria; or
- Fails a visual inspection.

  Rejected poles are categorized as either reinforceable with steel or non-reinforceable and are to be replaced.

- **Visually Rejected**: Any wood pole that has been damaged (i.e., burned, split, broken, hit by a vehicle, damaged by animals, etc.) above the ground line to such an extent as to warrant rejection and that cannot be further tested to determine priority status.
- **Sounded, Bored, and Treated**: Any wood pole set in concrete, asphalt, or solid rock 10 years or more prior to the inspection date is internally treated. Internal treatment involves fumigating the good wood and flooding the voids with fumigant.

8.4.6. Cathodic Protection and Inspection Program

Cathodic protection systems are employed on select steel transmission towers. These systems use either an impressed current corrosion protection system (ICCP) or direct-buried sacrificial magnesium anodes. Included in Idaho Power's tower maintenance plan, every 10 years, structure-to-soil potential testing is performed on select towers with direct-buried anodes. For ICCP systems, rectifiers and ground-beds are tested to ensure they are functioning properly. Based on test results, repairs and adjustments are completed. Each year all rectifiers are inspected, and direct current (DC) voltage and DC current readings noted.

8.4.7. Transmission Asset Protection

8.4.7.1. Wood Pole Wildfire Protection Program

To help improve the resiliency of Idaho Power's transmission system and the company's wood transmission poles, Idaho Power seeks to wrap certain wood transmission poles with a fire-resistant mesh. The mesh wrap helps protect the integrity of the pole if it is exposed to fire. Idaho Power is in the process of installing mesh wrapping on transmission wood poles located in the Tier 3 and Tier 2 zones and plans to install mesh on approximately 704 transmission poles in 2025. The company retains the option to utilize mesh in additional areas outside wildfire risk zones, including areas that may exhibit frequent fire return intervals.

8.4.7.2. Transmission Steel Poles

Idaho Power uses steel poles or structures for new transmission line construction projects built to 138-kV standards and above to minimize wildfire damage and improve transmission line resilience. Wood poles may be used on 138-kV structures for emergency and maintenance replacements based on the specific engineering, right-of-way (ROW), permitting, and scheduling requirements for each project.

8.4.7.3. Transmission Line Rebuild Projects

Idaho Power takes proactive steps to repair or replace transmission line components on an ongoing basis as part of asset management and aging infrastructure assessments. Annually, inspection activities inform maintenance needs with short- and long-term plans developed to manage line assets. In some cases, lines are selected to be rebuilt in the future to increase capacity, reliability, or improve safety. Wildfire risk and the location of transmission lines are considered as part of the prioritization of transmission line rebuild projects. Table 14 summarizes transmission line rebuild projects planned over the next five years. These projects will improve reliability for customers and increase resiliency of the transmission system from wildfire. Construction schedules and material lead times may change and adjust the in-service dates shown.

Table 14
Transmission line rebuild projects, estimated planned investment ($000s) and timeline

Transmission Line	Description	2025 Planned Cost	2026 Planned Cost	2027 Planned Cost	2028 Planned Cost	2029 Planned Cost	5-Year Planned Cost Idaho	5-Year Planned Cost Oregon
Line 412—Rebuild of existing Boise Bench to Emmett 138-kV transmission line, Idaho	Rebuild the Boise Bench to Emmett 138-kV line using steel structures instead of wood as identified in WMP.	$10,393					$10,393	
Line 433—Rebuild existing Wood River to Ketchum 138-kV transmission line, Idaho	Rebuild the existing 138-kV transmission line from Wood River to Ketchum Substation, Idaho, using steel structures instead of wood as identified in WMP.	$246	$626	$8,022			$8,894	
Line 204—Rebuild Boise to Emmett Junction, the Cairo to Fruitland tap to 138-kV specifications, Idaho	Rebuild existing 69-kV line structures to 138-kV capabilities, using steel structures instead of wood as identified in WMP.		$39	$103	$14,726	$2,112	$16,980	
Line 328—Rebuild Existing Emmett to Warm Lake 69-kV line to 138-kV specifications, Idaho	Rebuild existing 69-kV line structures to 138-kV capabilities using steel structures instead of wood as identified in WMP.	$139	$127	$25,482	$25,811	$1	$51,560	
Line 423—Rebuild the Ontario to Huntington 138-kV transmission line, Oregon	Rebuild the Ontario Substation to Huntington Substation, Oregon, with tubular steel 138-KV H-frame structures.	$157	$159	$11,734	$13,417	$0		$25,467
Line 701—Rebuild from Quartz Substation to La Grande 230 kV	Replace wood structures with tubular steel 230-kV H-frame structures.	$65	$621	$354	$201	$26,015		$27,256
Line 906 Boise Bench to Midpoint substation 230 kV, Idaho	Replace poles, cross arms, and insulators identified during the Pole Inspection and Groundline Treatment Program and the annual routine Line Patrols.	$1,676					$1676	

Transmission Line	Description	2025 Planned Cost	2026 Planned Cost	2027 Planned Cost	2028 Planned Cost	2029 Planned Cost	5-Year Planned Cost Idaho	5-Year Planned Cost Oregon
Line 906—Boise Bench to Midpoint Substation, 230 kV #2, Idaho	Rebuild line from Boise Bench Substation to Midpoint Substation, Idaho. Wood structures will be replaced with tubular steel 230-kV H-frame structures.		$16	$37	$0	$6,945	$6,998	
Line 908—Rebuild the Pallette to Imnaha 230-kV transmission line, Oregon, currently in preliminary scoping	Rebuild the Pallette to Imnaha 230-kV line, Oregon, with tubular steel H-frame structures.	$7,737	$8,491	$3,559				$19,787
T902—Rebuild the Boise Bench to DRAM Substation segment on the Boise Bench to DRAM to Midpoint #1 230-kV line (Phase 2), Idaho	Phase two of four phases of the transmission line rebuild. The line is to be constructed using steel H-frame structures.	$1,791					$1,791	
Line 902—Rebuild the Mountain Air Wind Park to Rattle Snake Station segment on the Boise Bench to DRAM to Midpoint #1 230-kV line (Phase 3), Idaho	Phase three of four phases of the transmission line rebuild. The line is to be constructed using steel H-frame structures.			$2,300	$6,745		$9,045	
Line 902—Rebuild the Midpoint to Mountain Air Wind Park Station segment on the Boise Bench to DRAM to Midpoint #1 230-kV line (Phase 4), Idaho	Phase four of four phases of the transmission line rebuild. The line is to be constructed using steel H-frame structures.	$1,600	$19,988	$15,788	$6,944		$44,320	
Line 410—Rebuild Lucky Peak Junction to Mountain Home Junction segment of Lucky Peak to King Line 138-kV line rebuild, Idaho	Rebuild with steel poles instead of wood.	$7,730	$17,868				$25,598	
Line 410—Rebuild the Black Mesa Substation to Cassia Wind Park segment of Lucky Peak to King 138-kV line rebuild, Idaho	Rebuild with steel poles instead of wood.			$7,568			$7,568	

Transmission Line	Description	2025 Planned Cost	2026 Planned Cost	2027 Planned Cost	2028 Planned Cost	2029 Planned Cost	5-Year Planned Cost Idaho	5-Year Planned Cost Oregon
Line 410—Rebuild DRAM to Lucky Peak of the 138-kV line rebuild, Idaho	Rebuild with steel poles instead of wood.				$3,193	$10	$3,203	
Line 410—Rebuild Mountain Home Junction to Black Mesa segment of Lucky Peak to King 138-kV line rebuild, Idaho	Rebuild with steel poles instead of wood.				$25		$25	
Line 925—Rebuild Lucky Peak Junction to segment of the Lucky Peak to King 138-kV line rebuild, Idaho	Rebuild with steel poles instead of wood.		$5,473	$2			$5,475	
Line 401—Relocate line terminal from CLIF to RMVW, Idaho	Remove 2,880' of 138-kV line and rebuild new section using steel structures instead of wood as identified in WMP and WMP IPUC application.	$43	$444	$15			$502	
Line 403—Minidoka Loop 138 kV. Replace Structures 1–4 with steel , Idaho	Replace structures 1–4 with steel. There are currently 16 wood poles in these 4 structures.				$9	$9	$18	
Line 407—Relocate line terminal from CLIF to RMVW, Idaho	Remove 3,582' of 138-kV line and rebuild new section using steel structures instead of wood as identified in WMP and WMP IPUC application.	$35	$110	$213			$358	
Line 702—Midpoint–Hunt 230 kV. Rebuild 3 structures with steel structures, Idaho	This work is proposed to be completed during the 10-year maintenance in 2028.		$10	$20	$150		$180	

Transmission Line	Description	2025 Planned Cost	2026 Planned Cost	2027 Planned Cost	2028 Planned Cost	2029 Planned Cost	5-Year Planned Cost Idaho	5-Year Planned Cost Oregon
Line 731—Reconstruct the BOMT–HBRD 138-kV line (T708) line to become new double-circuit 230/138-kV line (T731/T, Idaho	Reconstruct the BOMT-HBRD 138-kV line (T708) line to become new double-circuit 230/138-kV line (T731/T482). Construction will be single-pole steel structures on foundations.	$17,979	$3,179				$21,158	
Line 920—New line for new Greenleaf Substation (GNLF), Idaho	2027 project for Greenleaf Substation will require rebuild of portion of CDWL–WDJN section of line 251 to a double-circuit 138/69-kV configuration.	$23	$241	$1,423			$1,687	

8.5. Distribution Asset Management and Inspection Initiatives

Idaho Power's distribution asset management programs include condition-based, detailed, and ground visual inspection; distribution wood pole inspection and treatment; and line equipment inspections. Line patrol personnel meet on a quarterly basis to review and maintain alignment on the types of defects they look for as well as the proper priority categorization placed on defect identification. These exercises help to create and maintain consistency in inspection and reporting practices among inspectors and across the regions in Idaho Power's service area.

Annual inspections performed in Oregon Tier 2 and Tier 3 zones comply with the requirements of Oregon Administrative Rules in Chapter 860, Division 24: frequency of inspections and identification of defects and potential ignition sources.

Idaho Power implements an enhanced overhead distribution "hardening" program, detailed in section 8.5.5.

8.5.1. Ground Visual Inspection

Annually, qualified line patrol personnel (trained in distribution line inspection procedures and experienced in distribution line construction) complete visual wildfire mitigation inspections of the distribution lines located in Tier 3 zones to identify Priority 1 defects. The ground patrols are completed using four-wheel-drive vehicles, ATVs, UTVs, or on foot. They involve inspection at each individual pole and incorporate the use of visual observation, binoculars, and/or UAVs, as appropriate. These inspections identify potential line defects, which are then documented, prioritized, and scheduled for repair consistent with defect classification. Detailed distribution inspections are completed on a predetermined schedule and may be performed in conjunction with annual visual inspections.

8.5.2. Line Equipment Inspection Program

Line equipment in wildfire risk zones, including capacitor banks, automatic reclosing devices, and regulators, are inspected annually prior to wildfire season by line operations technicians. The inspection includes a visual inspection and, when electronic controls are present, control data is also analyzed.

8.5.3. Thermal Imaging (Infrared) Inspections

Idaho Power annually inspects targeted distribution lines and equipment within Tier 3 zones using thermal imaging (infrared) cameras. Compromised electrical connections and overloaded

equipment may be identified using thermal imagery. Identified risks will be prioritized and mitigated consistent with defect classification.

8.5.4. Wood Pole Inspection and Treatment Program

On a 10-year inspection cycle, wood poles are visually inspected, sounded, and bored for defects and decay. The procedure for the Distribution Wood Pole Inspection and Treatment Program is consistent with and elaborated on earlier in this section under the Transmission Wood Pole Inspection and Treatment Program.

8.5.5. Overhead Primary Hardening Program

Overhead distribution infrastructure located in Tier 3 zones is analyzed, inspected, and may be hardened depending on inspection findings, proximity to fuels that may be conductive to wildfires, and risk model data. The Overhead Primary Hardening Program is intended to upgrade or repair certain overhead distribution infrastructure to reduce potential risk of ignition. The following outlines the core strategies Idaho Power utilizes as part of the Overhead Primary Hardening Program. However, Idaho Power's team is continually researching and evaluating industry practices and emerging technologies relative to primary hardening. Notable hardening criteria is expanded on below.

Idaho Power Overhead Distribution Primary Hardening Program Strategies*

- Replace "small conductor" with new 4 ACSR or larger conductor.
- Replace or repair damaged conductor.
- Re-tension loose conductors including "flying taps" and slack spans as required.
- Replace wood-stubbed poles with new wood poles.
- Replace white and yellow square tagged poles with new wood poles.
- Replace wood crossarms with new fiberglass crossarms.
- Replace steel insulator brackets with new steel pins/fiberglass crossarms.
- Replace wedge deadends on primary taps with new polymer deadend strain insulators.
- Replace aluminum deadend strain insulators with new polymer deadend strain insulators.
- Replace porcelain switches with new polymer switches.
- Install bird/animal guarding.
- Replace hot line clamps:
  - Replace aluminum stirrups.
  - Install avian cover.
  - Relocate arresters.
- Update capacitor banks :
  - Replace swelling capacitors.
  - Replace oil-filled switches with vacuum style.
  - Replace porcelain switches with polymer switches.
- Install disconnect switches on CSP transformers.
  - Install avian cover.
- Update down guys.
  - Replace/Install down-guy insulators with fiberglass insulators.
- Tighten down guys.
  - Tighten hardware.
- Correct third-party pole attachment clearances (report to Joint Use department).
- Replace all arresters with non-expulsion arresters.
- Replace all expulsion fuses with ELF or SMU Power fuses.

* Overhead distribution infrastructure located in Tier 3 zones is analyzed, inspected, and hardened as appropriate utilizing the strategies indicated above depending on inspection findings, proximity to fuels that may be conductive to wildfires, and risk model data.

Conductor "Small" Replacement

Idaho Power is implementing replacement of small conductors in Tier 3 zones as part of the Overhead Primary Hardening Program. Small conductors are those in sizes less than that of 4ACSR conductor. Examples of small wires include 6Cu, 6-3SS, 8A, 8A CW, 9IR, etc. These small conductors are targeted to be replaced with standard larger conductors, primarily with 4ACSR conductor.

Wood Crossarm Replacement

Wooden crossarms will continue to be replaced with fiberglass crossarms and steel pins as part of the Overhead Primary Hardening Program. And, whenever work is being completed on a structure that requires replacement of existing wooden crossarms, Idaho Power may install fiberglass crossarms.

Porcelain Switch Replacement

Porcelain switches located in Tier 3 zones will continue to be replaced with polymer switches. Additionally, associated hot clamps and stirrups will be replaced. This work will be coordinated and included in the overhead primary hardening program.

Fuse Options

Idaho Power replaces expulsion fuses with non-expulsion fuses in Tier 3 zones as a part of its distribution overhead primary wildfire hardening program.

8.6. Ignition Tracking and Analysis

The WMP is founded on the goal of minimizing the probability that the company's equipment causes a wildfire. The company has evaluated and implemented mitigation strategies to reduce the likelihood of ignition and tracks outage events to gauge performance.

The company maintains an Outage Management System (OMS) database for reliability and performance reporting. This database may be utilized to monitor outage events and evaluate whether equipment is more susceptible to performance issues or has the potential to act as an ignition source. Analysis may include factors such as outage location, timing, and wildfire season, particularly in wildfire risk zones. Environmental factors like vegetation, fuel moisture, weather, and seasonal conditions may also be considered.

Most outage events do not result in ignitions, and outcomes are often influenced by external factors beyond the company's control. Outages may be reviewed on a case-by-case basis, and insights from this process may also be used to inform Idaho Power's asset inspection programs, helping to identify and prioritize equipment that may require maintenance. If outages are associated with equipment failure, additional analysis may be conducted to determine whether equipment issues align with reported ignition events.

The company may also use tools linked to the OMS database to support analysis. For example, dashboards can provide details on outage events involving primary line fuses, transformer fuses, and automatic reclosing devices. These tools may help analyze wildfire risk for distribution circuits, track performance trends, and inform inspection and maintenance schedules.

Ignition Tracking Database

Idaho Power is making steady progress toward developing an ignition tracking database. In 2025, workflows and processes will be completed to begin systematically tracking and analyzing ignition events related to utility infrastructure, enabling data-driven decisions and continuous improvement of wildfire mitigation efforts.

Idaho Power plans to begin incorporating information from its ignition tracking processes into root cause analysis efforts. This integration will allow the company to focus on enhancing its understanding of the causes of ignition events to implement more measures to prevent reoccurrence.

8.6.1. Root Cause Analysis

Idaho Power exercises its discretion to conduct investigations and root cause analysis (RCA) where appropriate for repetitive equipment or material failure, significant incidents, and near misses. RCA is a systematic process of investigating adverse events and includes gathering evidence and details of the failure to determine the cause and prevent future occurrences.

8.7. Vegetation Management

8.7.1. Overview

Idaho Power's Transmission and Distribution (T&D) Vegetation Management Program (VMP) addresses public safety, regulatory compliance, electric reliability, and helps to safeguard T&D lines from trees and other vegetation that may cause an outage or damage to facilities. Specifically, the lines are inspected periodically, and trees and vegetation are cleared away from the line while certain trees are removed entirely. In addition, the VMP addresses the clearing of vegetation near the base of certain poles and line structures. The responsibilities of the VMP include the planning, scheduling, and quality control of VMP-associated work. The VMP is active year-round and complies with applicable NESC, federal, and state requirements.

Idaho Power faces challenges that can impede its ability to complete all aspects of its vegetation management goals. These include, but are not limited to, landowners who refuse pruning or removal of trees, shortage of qualified labor resources in the vegetation line clearing industry, inclement weather and terrain limiting access to overhead electric facilities during some seasons, urban growth that increases the number of trees near overhead electric facilities and cycle-buster trees that grow back after pruning more rapidly than other trees in the inventory. Given these obstacles, Idaho Power adheres to the vegetation management program outlined below to the extent practicable.

Additional vegetation monitoring tools are in various stages of development, and Idaho Power will evaluate such tools for potential future implementation.

8.7.2. Program Components

Idaho Power's key components of its VMP, relative to the WMP, are summarized in Table 15.

Table 15
Vegetation Management Program summary

Vegetation Management
Transmission
Pre-Fire Season Inspection and Mitigation
Line Clearing Cycle Goal: 3-year cycle for valley areas and 6-year cycle for mountain areas
Tree Removals—Hazard Trees
Targeted Pole Clearing
100% Quality Assurance/Quality Control Auditing in Tier 3 and Tier 2 Zones
Distribution
Pre-Fire Season Inspection and Mitigation
Line Clearing Cycle Goal: 3-year cycle in all areas with mid-cycle pruning occurring in second year in Tier 3 and Tier 2 Zones*
Tree Removals—Cycle Busters/Hazard Trees
Targeted Pole Clearing
100% Quality Assurance/Quality Control Auditing in Tier 3 and Tier 2 Zones

*Distribution line clearing cycles vary by utility. Idaho Power has set a goal of achieving a 3-year cycle of distribution line clearing.

Reliability data has shown that vegetation contact is one of the most likely sources of faults and possible ignition on the system. As noted in section 4.5.6., customers' electric interruptions related to vegetation interference reduced significantly in years where enhanced vegetation management took place compared to years before these activities were performed. As a result, Idaho Power employs enhanced vegetation management practices in both Tier 2 and Tier 3 zones. These practices include mid-cycle patrols and pruning in the second year of the cycle to address "cycle buster" trees, along with annual "hotspot" patrols to address any new hazard trees or unexpected vegetative growth that poses an imminent threat of contact with energized facilities. In addition, Idaho Power strives to complete audits for all pruning work performed in Tier 2 and Tier 3 zones. The audits confirm that pruning cuts meet the specification and proper clearance was obtained. Table 16 summarizes vegetation management activities with respect to wildfire risk zones.

8.7.3. Vegetation Management Definitions

Applicable Transmission Lines—Each overhead transmission line operated within WMP Tier 3 zones at 46 kilovolts (kV) or higher.

Cycle Buster—Trees that grow at a rapid rate, requiring a more frequent trimming schedule than the normal trim cycle.

Hazard Tree—Any vegetation issue that poses a threat of causing a line outage but has either a low or medium risk of failure in the next month. Hazard trees will be further defined as posing either a medium hazard or low hazard.

High-Priority Tree—Any vegetation condition likely to cause a line outage with a high risk of failure in the next few days or weeks. High-priority trees could also be vegetation that is in good condition but has grown so close to the lines that it could be brought into contact with the line through a combination of conductor sag and/or wind-induced movement in the conductor or the vegetation.

Line Clearing Cycles—T&D clearing of lines defined on a periodic basis.

Table 16
Summary of vegetation management activities and schedules

Vegetation Management	Inspection Interval					
Inspections and Activity Schedule	**Idaho Non-Risk Zone**	**Oregon Non-Risk Zone**	**Idaho Tier 2 Zone**	**Oregon Tier 2 Zone**	**Idaho Tier 3 Zone**	**Oregon Tier 3 Zone**
Transmission						
Hazard Tree Patrol on NERC/WECC Lines	Annually	Annually	Annually	Annually	Annually	Annually
Cycle Patrol/Pruning—Valley Locations	3 Years	3 Years	3 Years	3 Years	3 Years	3 Years
Cycle Patrol/Pruning—Mountain Locations	6 Years	6 Years	6 Years	6 Years	6 Years	6 Years
Wildfire Mitigation Patrol/Pruning	None	None	None	None	Annually	Annually
Cycle Buster Patrol/Pruning (Documented Cycle Buster Trees)	18 Months	18 Months	18 Months	18 Months	18 Months	18 Months
Distribution						
Wildfire Mitigation Patrol/Pruning	None	None	Annually	Annually	Annually	Annually
Cycle Patrol/Pruning	3 Years	3 Years	3 Years	3 Years	3 Years	3 Years
Mid-Cycle Patrol/Pruning	None	None	2 Years after Cycle Prune	2 Years after Cycle Prune	2 Years after Cycle Prune	2 Years after Cycle Prune
Cycle Buster Patrol/Pruning	None	18 Months	Covered by Mid-Cycle	Covered by Mid-Cycle	Covered by Mid-Cycle	Covered by Mid-Cycle
Quality Assurance (Transmission and Distribution)						
Post-Pruning Audit Inspections	Sampling	Sampling	100%	100%	100%	100%

8.7.4. Transmission Vegetation Inspection and Management

Maintaining a vegetation-free clearance zone near transmission lines has long been a priority for Idaho Power. The clearance zone is voltage-level dependent and defined by federal and state regulations.

8.7.4.1. Transmission Vegetation Inspections

Utility arborists annually conduct aerial and/or ground patrols on each applicable transmission line to identify and mitigate vegetation hazards. In addition, transmission patrol personnel inspect all applicable transmission lines once a year to identify any transmission defects and vegetation hazards. During these inspections, the patrol personnel identify hazardous vegetation, within or adjacent to the ROW, which could fall in or onto the transmission lines or associated facilities. The patrol personnel also evaluate the hazardous vegetation based on the level of potential threat posed, categorizing the vegetation as a *higher priority*, *medium hazard*, or *lower hazard*. Any hazardous vegetation found is reported to the utility arborist and documented. Any hazardous vegetation categorized as *higher priority* and that presents a risk to cause an outage at any moment is expected to be reported without any intentional time delay to the grid operator. The utility arborist conducts a follow-up inspection if potential hazard trees or grow-ins are identified. The utility arborist prioritizes and schedules remedial action for all reported vegetation issues.

8.7.4.2. Transmission Line Clearing Cycles

Transmission lines are cleared on long-term cycles based on three years for urban and rural valley areas and six years for mountain areas. However, shorter clearing cycles may occur if conditions dictate out-of-cycle trimming. In most cases, vegetation is cleared primarily through manual cutting of targeted trees and tall shrubs. When appropriate, tree-growth regulators and spot herbicide treatments are applied in compliance with federal or state requirements. These treatments are effective for reducing re-growth of sprouting deciduous shrubs and trees and extending maintenance cycles.

Online, cloud-based vegetation management software is utilized to plan tree pruning and removal work, to assign this work to crews, and to document the dates work is planned, assigned, completed, and audited.

8.7.4.3. Transmission Line Clearing Quality Control and Assurance

In non-wildfire risk zones, audits are performed on a random sample of pruning worksites. These audits are performed through a combination of the contracted arborists that planned the work and Idaho Power's utility arborists. In Tier 2 and Tier 3 zones, audits are performed on 100% of pruning work regardless of the reason for the patrols and pruning. The audits are performed by a combination of contracted arborists and Idaho Power's

utility arborists to check whether pruning cuts meet specification and proper clearance was achieved. This quality control and assurance program has proven valuable. These audits have discovered trees that were either improperly pruned or not pruned at all. As a result, Idaho Power requested the pruning contractor re-prune these circuits to achieve satisfactory results.

8.7.5. Distribution Vegetation Management

Idaho Power is actively working to clear distribution lines throughout the company's service area on a three-year cycle. Additionally, in Tier 2 and Tier 3 zones, Idaho Power completes annual vegetation line inspections and mid-cycle clearing of the lines in the second year. The sections below describe Idaho Power's line clearing cycle and inspection processes.

8.7.5.1. Distribution Line Clearing Cycles

Idaho Power is actively working to clear distribution lines on a three-year cycle. In Tier 2 and Tier 3 zones, Idaho Power's strives to perform mid-cycle pruning in the second year to remove faster growing vegetation to ensure the lines are clear of vegetation for the full pruning cycle. In addition, Idaho Power clears lines on an "as-needed basis" in the situations where fast growing, unexpected growth occurs and is reported by any employee or customer.

8.7.5.2. Distribution Vegetation Inspections

In addition to regular cycle pruning activities, utility arborists are annually conducting ground patrols to identify potential vegetation hazards of each distribution line in Tier 2 and Tier 3 zones. In addition, distribution patrol personnel also inspect the lines in the Tier 3 zones annually. During these inspections, patrol personnel identify infrastructure defects and hazardous vegetation, within or adjacent to the ROWs, that could fall onto the distribution lines or associated facilities. The patrol personnel then evaluate the level of threat posed by the hazardous vegetation by categorizing the vegetation as a *higher priority*, *medium hazard*, or *lower hazard*. Any hazardous vegetation found is reported to the utility arborist and documented. Any hazardous vegetation categorized as a *higher priority* that presents a risk to cause an outage at any moment is expected also be reported to the grid operator without any intentional time delay. The utility arborist conducts a follow-up inspection if potential hazard trees or grow-ins are identified. The utility arborist prioritizes and schedules any remedial action for all reported vegetation issues.

Online, cloud-based vegetation management software is utilized to plan tree pruning and removal work, to assign this work to crews, and to document the dates work is planned, assigned, completed, and audited.

8.7.5.3. Distribution Line Clearing Procedures

In most cases, vegetation is cleared as scheduled work and includes, but is not limited to, the removal of dead branches overhanging power lines, weak branch attachments, damaged root base, or dead or dying trees leaning toward Idaho Power facilities. Vegetation clearing methods include crews using chain saws or specialized pruning machines. Trees are cleared using a pruning procedure called directional or natural pruning, a method recommended by the International Society of Arboriculture, and the ANSI A300 standards.

When appropriate, tree-growth regulators and spot herbicide treatments are applied in compliance with federal or state requirements. These treatments are effective for reducing re-growth of sprouting deciduous shrubs and trees and extending maintenance cycles.

Through its VMP, Idaho Power has a target to maintain clearance distance between vegetation and conductors as follows:

- Five feet for conductors energized at 600 through 50,000 volts.
- Clearances may be reduced to three feet if the vegetation is not considered to be readily climbable because the lowest branch is greater than eight feet above ground level.
- New tree growth no larger than ½ inch in diameter may intrude into this minimum clearance area provided it does not come closer than six inches to the conductor. This new growth is identified during line patrols and removed.
- For conductors energized below 600 volts, vegetation is pruned to prevent the vegetation from causing unreasonable strain on electric conductors.

8.7.5.4. Distribution Line Clearing Quality Control and Assurance

Similar to Idaho Power's vegetation audit process for transmission, in non-wildfire risk zones, audits are performed on a random sample of pruning worksites. Audits are performed through a combination of contracted arborists and Idaho Power's utility arborists. In Tier 2 and Tier 3 zones, audits are performed on all pruning work. If an audit indicates unsatisfactory results, such as improper pruning, Idaho Power requests the pruning contractor re-prune circuits to achieve satisfactory results.

8.7.6. Pole Clearing of Vegetation

Idaho Power has historically cleared vegetation from the base of certain transmission wood poles and a limited number of distribution wood poles in Idaho. These vegetation clearing practices are an effective method of minimizing wildfire damage to existing wood poles. Where acceptable and permissible, Idaho Power removes or clears vegetation in a 20-foot radius surrounding wood poles and applies a 10-year weed-control herbicide that remains

effective for several years (SpraKil SK-26 Granular). In 2023, Idaho Power submitted an SF-299 application with the Oregon Bureau of Land Management (BLM) Vale District Office to prepare an environmental assessment to use the same ground sterilant on transmission and distribution facilities in Oregon. This application is still being reviewed by the BLM.

9. Wildfire Response

9.1. Overview

Idaho Power responds to wildfires involving or impacting its facilities and/or resulting in a system outage. Depending on the specific circumstances, Idaho Power may also respond to wildfires with the potential to result in an outage. Idaho Power's response includes the following without limitation. These actions are taken on a 24-hour basis:

- Taking appropriate steps, where safe to do so, to protect Idaho Power-owned facilities from fire damage. This may include emergency de-energization for any of the reasons described below.
    - Restoring electrical service following an outages; and,
    - Communicating with and informing customers.

9.2 Emergency De-energization

With exposure to environmental conditions, overhead transmission and distribution lines are subject to a variety of effects that may influence reliability and overall performance. When a wildfire is near or approaching, Idaho Power may conduct an emergency de-energization of overhead lines for the following reasons:

- To ensure the safety of firefighters and firefighting activities, such as aircraft dropping fire retardant or water on or near overhead lines;
- To avoid arcing or the conduction of electricity through the air when wildfires and/or concentrated smoke is in vicinity;
- To prevent a wildfire from burning through an energized line that may be at risk of fire damage or arcing.

9.3 Response to Active Wildfires

Idaho Power field crews are trained to respond to active wildfires to monitor the situation regarding Idaho Power's facilities. Although they carry certain fire suppression equipment for use on very small fires in limited situations, Idaho Power's crews are not professionally trained firefighters and are instructed not to place themselves in a hazardous position when responding to wildfires. When responding to an active wildfire, Idaho Power personnel immediately report to, and take appropriate direction from, the Incident Commander (IC) or other fire response entity official with jurisdiction over the incident.

In 2024, Idaho Power began using a dedicated wildland fire engine and firefighting personnel in certain situations to support on-the-ground safety and infrastructure protection. Idaho Power intends to continue to utilize contracted firefighting personnel in 2025 on an as-needed, case-by-case basis. The personnel protect critical infrastructure and provide situational awareness and coordination within the incident command structure during an event and safeguard utility crews working on restoration activities.

9.4. Restoration of Electrical Service

Idaho Power personnel restore electrical service when it is safe to do so following a wildfire.

At certain times, emergency or unplanned de-energization of lines requires qualified line personnel to conduct “emergency” patrols (inspections) of the de-energized lines. These patrols identify outage causes, damaged facilities, ingress/egress routes, and restoration requirements (number of crews, crew sizes, and necessary materials).

If damage is detected, trained field crews report to the site where damage has occurred with equipment and new materials and develop a plan to remove and rebuild damaged facilities. Depending on the situation, contracted field crews—such as line crews and vegetation management crews—are also deployed to assist in restoration efforts. Restoration work may take hours or, in some cases, days to complete. Depending on the extent of damage, customers may need to perform repairs on their facilities and pass inspections by local agencies prior to having full electric service restored.

9.4.1. Mutual Assistance

Idaho Power is a member of the Western Region Mutual Assistance Group (WRMAG), of which most western United States electric utilities are also members. Member utilities provide emergency repair and restoration assistance to other member utilities requesting assistance when dealing with damaged electric facilities following a significant wildfire or weather event. In the event of a wildfire that causes widespread damage to Idaho Power’s system, Idaho Power may request restoration assistance via the WRMAG as a last resort option after utilizing available internal personnel and contracted entities.

9.5. Public Outreach and Communications

Idaho Power follows its relevant internal processes to guide wildfire-related communication protocols. External communication includes customers, public safety partners, and operators of critical facilities.

10. Communicating About Wildfire

10.1. Objective

Idaho Power communicates information about this Wildfire Mitigation Plan (WMP) — including public safety power shutoff (PSPS) and wildfire issues in general — to employees, customers, government officials, the public, and other stakeholders. The following objectives guide all wildfire-related communications:

- Educate customers about how to prepare for wildfire-related outages, including where to find outage and PSPS information, and how to update contact information.
- Explain how customers can reduce wildfire risk.
- Raise awareness about Idaho Power's work to protect the grid from wildfire and reduce wildfire risk.

10.2. Community Engagement

Idaho Power presents and distributes information on its WMP to a wide variety of stakeholders including public safety partners, critical facilities, and the community.

Each year, prior to wildfire season, communications begin with public safety partners, including the Idaho and Oregon state offices of emergency management, county emergency managers, local governments, and social service and welfare agencies. These communications are held both individually and in larger groups during Local Emergency Planning Committee meetings, where the company provides an overview of the WMP and discusses the PSPS plan and outage preparation. Feedback from these partners is captured each year to inform future versions of the WMP, along with collaboration to identify opportunities for public outreach.

Idaho Power additionally focuses engagement efforts with operators of critical facilities. These operators include, but are not limited to, hospitals, police and fire stations, wastewater treatment facilities, and telecommunication providers. During these interactions, Idaho Power ensures contact information and communication preferences are current, provides an overview of the communication process during a PSPS, and shares outage preparedness tips.

Public meetings are held through various formats, including formal presentations, open-house events, community-based organization collaborations, and virtual town halls throughout the company's service area. Topics include review of the WMP, communication during a PSPS, wildfire prevention, and emergency outage preparedness.

Additionally, to ensure messaging reaches access and functional needs customers, the company collaborates with the Living Independent Network Corporation, the Southwest Idaho Area Agency on Aging, and Norco to present on outage preparedness. The information provided includes considerations for older adults and individuals with disabilities, and information about medical equipment considerations during an outage, emphasizing the importance of battery backups.

Idaho Power's 2024 targeted outreach efforts included customers more likely to experience a PSPS due to proximity to or within a wildfire risk zone. Attendance at outreach engagements significantly varied, with some meetings having no participants and others attracting many attendees reaching levels near 100. The company's 2024 outreach efforts are summarized in Table 17.

Table 17
Idaho Power community engagement, 2024

Type	Details	Date	Type	Details	Date
Public Meetings	Boise, ID—BSU Hazard and Resilience Institute	Feb. 1	Public Meetings	Emmett, ID—Community	May 17
Public Safety Partners	ID Military Division—FEMA West Collective Cohort Training	Feb. 13	Public Meetings	Ola, ID, High Valley—Community	May 20
Public Safety Partners	Baker County, OR—Emergency Management Coordinator	Feb. 27	Public Meetings	Bannock County, ID, Northern Pocatello—Community	May 20
Public Safety Partners	ID—Living Independent Network	Feb. 29	Public Meetings	Bannock County, ID, Southern Pocatello—Community	May 21
Public Safety Partners	Halfway, OR—Outage Preparedness Fair	March 4	Public Meetings	Oneida County, ID—Community	May 21
Public Safety Partners	Canyon County, ID—Emergency Management Coordinator	March 4	Public Meetings	Horseshoe Bend, ID—Community	May 21
Public Safety Partners	Power County, ID— Local Emergency Planning Committee	March 7	Public Meetings	Homedale, ID, Adrian, OR—Community	May 22
Public Safety Partners	Lemhi County, ID—Emergency Management Coordinator	March 11	Public Meetings	Eagle, ID—Community	May 22
Public Safety Partners	Ada County, ID— Local Emergency Planning Committee	March 14	Public Meetings	Twin Falls County, ID, Rock Creek—Community	May 22
Public Safety Partners	Bannock County, ID—Emergency Management Coordinator	Mar 15	Public Meetings	Unity, OR—Community	May 23
Public Safety Partners	Ontario, OR—Chamber of Commerce	March 18	Public Meetings	Mountain Home, ID—Community	May 23
Public Safety Partners	Elmore County, ID—Emergency Management Coordinator	March 18	Public Safety Partners	Elmore County, ID—Local Emergency Planning Committee	May 23

Type	Details	Date	Type	Details	Date
Public Safety Partners	Gem County, ID— Local Emergency Planning Committee	March 19	Public Meetings	Weiser, ID—Community	May 28
Public Safety Partners	Payette County, ID—Emergency Management Coordinator	March 20	Public Safety Partners	Boise, ID—Mayor's Office	May 29
Public Safety Partners	Owyhee County, ID—Emergency Management Coordinator	March 20	Public Meetings	Halfway, OR—Community	May 29
Public Safety Partners	Adams County. ID	*	Public Meetings	Cambridge, ID—Community	May 30
Public Safety Partners	Washington County, ID	*	Public Meetings	New Meadows, ID—Community	June 3
Public Safety Partners	Valley County, ID—Emergency Management Coordinator	March 28	Public Meetings	Power County, ID—Community	June 3
Public Safety Partners	Power County, ID— Local Emergency Planning Committee	March 28	Public Meetings	Yellow Pine, ID—Community	June 4
Public Safety Partners	Ada County, ID—Dispatch/Fire Chiefs	April 3	Public Meetings	Virtual Offering—All Customers	June 4, 5, 6
Public Safety Partners	Blaine County, ID—Emergency Management Coordinator	April 4	Public Meetings	Valley County, ID—Community	June 4
Public Safety Partners	Oneida County, ID—Emergency Management Coordinator	April 4	Public Meetings	Cascade, ID—Community	June 4
Public Safety Partners	Idaho County, ID—Emergency Management Coordinator	April 8	Public Meetings	Star, ID—Community	June 4
Public Safety Partners	Bannock County, ID— Local Emergency Planning Committee	April 8	Public Meetings	Elmore County, ID, Boise River Senior Center—Community	June 4
Public Safety Partners	Twin Falls County, ID—Local Emergency Planning Committee	April 9	Public Meetings	McCall, ID—Community	June 5
Public Safety Partners	Power County, ID— Local Emergency Planning Committee	April 25	Public Meetings	Idaho County, ID—Community	June 5
Public Safety Partners	Boise County, ID—Emergency Response, Boise National Fire Leadership, Idaho Department of Lands Leadership	April 29	Public Meetings	Donnelly, ID—Community	June 7
Public Meetings	Canyon County, ID—Community	April 30	Public Meetings	Council, ID—Community	June 7
Public Safety Partners	Boise County, ID—Emergency Management Coordinator	April 30	Public Meetings	Boise, ID, City Council—Community	June 10
Public Meetings	Murphy, ID—Community	May 1	Public Safety Partners	Idaho Department of Health and Welfare	June 13
Public Meetings	Idaho City, ID—Community	May 1	Public Meetings	Kuna, ID—Community	June 13

Type	Details	Date	Type	Details	Date
Public Meetings	Vale, OR—Community	May 2	Public Meetings	Blaine County, ID, Hailey—Community	June 18
Public Meetings	Boise, ID—Firewise Wildfire Preparedness Day	May 4	Public Meetings	Blaine County, ID, Ketchum—Community	June 19
Public Safety Partners	Ada County, ID—Emergency Management Coordinator	May 7	Public Meetings	Payette County, ID—Community	June 24
Public Safety Partners	Blaine County, ID— Local Emergency Planning Committee	May 9	Public Safety Partners	Boise, ID—Ada County Emergency Management Executive Council	June 24
Public Meetings	Crouch, Garden Valley, ID—Community	May 13	Public Meetings	New Plymouth, ID—Community	June 25
Public Meetings	Lemhi County, ID, Salmon Region—Community	May 13	Public Meetings	Juntura, OR—Community	June 26
Public Meetings	Lemhi County, ID, Elk Bend Region—Community	May 13	Public Meetings	Boise, ID, Micron Environmental Health & Safety Fair—Community	June 26
Public Meetings	Lowman, ID—Community	May 14	Public Meetings	Boise, ID, Avimor—Community	June 27
Public Meetings	Lemhi County, ID, Leadore—Community	May 14	Public Meetings	Living Independent Network, Norco, Southwest Idaho Area Agency on Aging—Virtual Offering	June 27
Public Meetings	Lemhi County, ID, North Fork—Community	May 14	Public Meetings	Placerville, ID—Community	July 6
Public Meetings	Malheur County, OR—Community	May 15	Public Safety Partners	Boise, ID, Ada County Extreme Heat Emergency Operations Coordination	July 8
Public Meetings	Nyssa, OR—Community	May 16	Public Safety Partners	Boise, ID—Ada County Severe Storm System	July 24
			Public Safety Partners	Boise, ID—Idaho Department of Corrections	Aug. 24

*Attempts to hold the indicated meeting type were unsuccessful.

As the company prepares for the 2025 wildfire season, efforts will continue to provide community and customer outage preparation education with a minimum of one public meeting in each county with a wildfire risk zone.

10.3 Community Resource Centers

Each county in Idaho Power's service area has unique needs during outage events and requires a customized, flexible approach. During annual meetings with county emergency managers, Idaho Power refines county-specific strategies in preparation for potential large-scale, extended outages. These strategies include working with emergency managers to identify Community Resource Center (CRC) locations to be used, if appropriate, in a PSPS event.

If a PSPS event is forecasted, Idaho Power strives to work directly with local public safety partners to identify and meet the needs of the local community. Services provided in collaboration with emergency managers could include, as appropriate:

- Stand-up of CRC
- CRC location(s) and logistics included in community outreach/outage notifications
- CRC resources
    - Food, water, and other basic needs
    - Charging stations
    - Auxiliary service coordination, such as medical services, housing assistance, family reunification, etc.
    - Mobile generators and/or battery packs to serve essential community resources

10.4. Customer Communications

Idaho Power's dedication to safety guides our strategy for wildfire-related communication to our customers. Communication methods and timing vary based on the audience we are trying to reach and the goal of the communication.

Idaho Power's goal in 2024 was to provide outreach and communications on our wildfire mitigation efforts for all customers, with focused awareness on the PSPS program for customers living in or near a wildfire risk zone who could potentially be impacted by a PSPS event. To achieve this goal, Idaho Power broke its approach into two categories:

1. Broad outreach to all customers.
2. Additional outreach to customers in areas where PSPS events are more likely.

The company uses a variety of outreach methods, described below, to reach a broad customer base with messages about wildfire safety, summer outage preparedness, and grid hardening efforts. Outreach to customers in areas more likely to have a PSPS in 2024 was focused on urging customers to update or confirm accurate contact information and how to find community-specific information related to PSPS and wildfire mitigation work.

10.4.1. Key Communication Methods

Idaho Power communicates with customers and the public before and throughout wildfire season to inform them of steps the company is taking to reduce wildfire risk and ways they can

help prevent wildfires and prepare for outages. Various communication mediums used to accomplish this include:

- *Connections* (monthly newsletter sent by Idaho Power to customers.) (Figure 25).
- Videos on topics like vegetation management and PSPS (Figure 26).
- Email messages telling customers how to prepare for wildfires, encouraging them to update their contact information, and providing information about grid hardening efforts (Figure 27).
- In 2024, the company notified all customers in PSPS zones by text message or phone call and postcard (Figure 28) with additional information about PSPS and how to prepare. This was the first year Idaho Power deployed a targeted PSPS messaging effort at this scale. Moving forward, Idaho Power plans to continue to work with public safety partners to determine community-specific needs for messaging as well as internally evaluate the benefit of targeted messaging vs. more general customer-wide communication approach.
- News media (news releases, appearances on broadcast TV and radio shows, interviews, etc.).
- Social media (posts on Facebook, Instagram, and X are an efficient way to reach large numbers of customers and the public quickly). Social media continues to be a critical tool for engaging with customers and communicating wildfire safety (Figure 29). The company's social media campaign for wildfire season focuses on three main themes:
    - Wildfire prevention: What Idaho Power is doing and what customers can do to reduce wildfire risk.
    - Outage preparation: How customers—especially those who live or have businesses in wildfire risk zones—should prepare for wildfire-related outages.
    - Grid maintenance: How Idaho Power protects the grid, keeping energy safe, reliable, and affordable, even during wildfire season.
- Postcards (Figure 30).
- Bill insert (Figure 31)
- Idaho Power's website (wildfire safety information, such as videos, safety tips, and the latest version of the WMP) can be found at www.idahopower.com/wildfire. As shown in Figure 32 on this webpage, the company introduces wildfire and its relationship to delivering power, information on PSPS, and the following links:

- *What is a PSPS?*: Explanation of PSPS events, including a map customers can use to determine if their homes or businesses are in a PSPS zone.
- *Be Prepared for Wildfire Season*: Preparation tips like building an outage kit and making a plan for feeding livestock, etc.
- *Protecting the Grid*: Idaho Power measures to enhance grid resiliency and reduce wildfire risk; an interactive map showing Tier 3 and Tier 2 zones and a link to the WMP.
- *How You Can Reduce Wildfire Risk*: Tips for preventing wildfires when camping, using fireworks, hauling trailers, etc.
- *PSPS Event Information*: Real-time information on active PSPS events, estimated shutoff time, outage duration, and customers impacted.

- Paid advertising (radio, digital [Figure 33] , and print advertisements).
- Flyers (Figure 34).

Figure 25
May 2024 issue of *Connections*

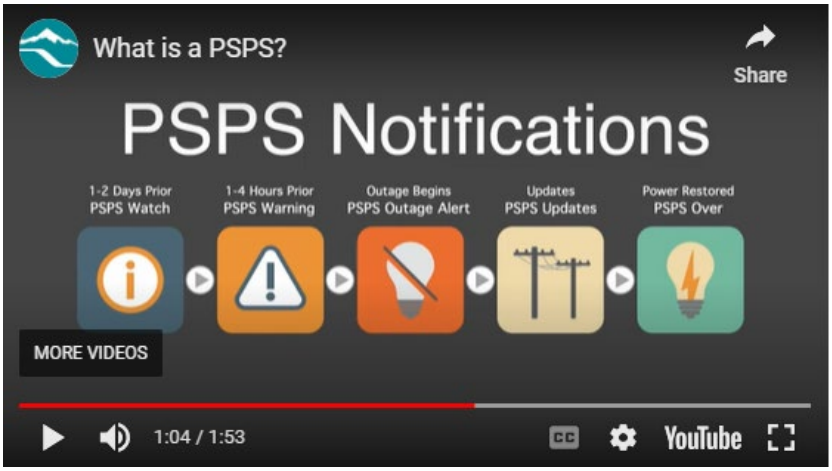


Figure 26
Idaho Power developed an educational video on PSPS events.

Join Our Virtual Meetings on Wildfire and PSPS

Idaho Power will host three virtual meetings in early June to explain the company's wildfire mitigation efforts and how customers can be prepared for outages, including a Public Safety Power Shutoff (PSPS). A PSPS is when an electrical company proactively cuts power to an area where wildfire risk is high due to extreme weather. It is a last resort for the safety of our customers, employees, and communities.

Interested customers can join any of the following virtual meetings:
Date: June 4 **Time:** 6–7 p.m.
Date: June 5 **Time:** 6–7 p.m.
Date: June 6 **Time:** 6–7 p.m.

For meeting links and more information on Idaho Power's PSPS plan, our work to protect the grid and reduce wildfire risk, and tips for preparing for wildfire season, visit idahopower.com/wildfire.

Figure 27
Customer email, May 2024

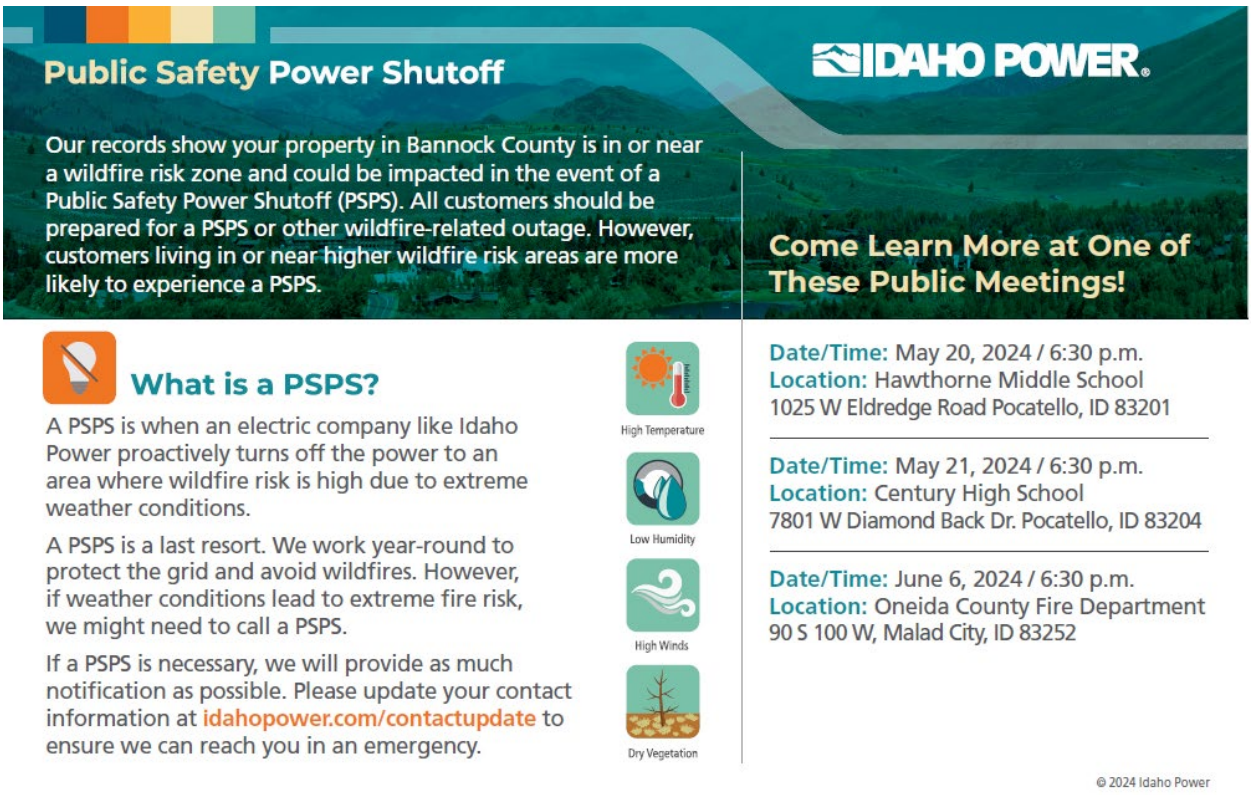
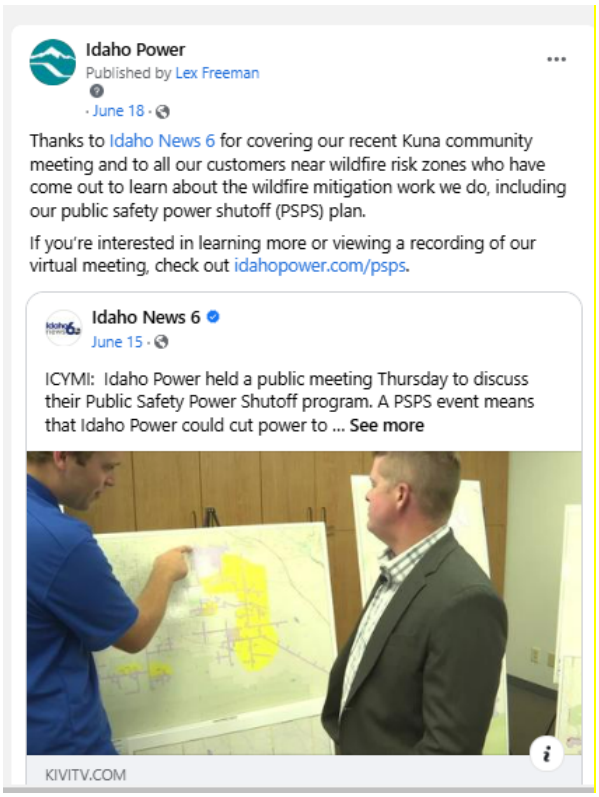


Figure 28
Postcard to customer living in a WRZ



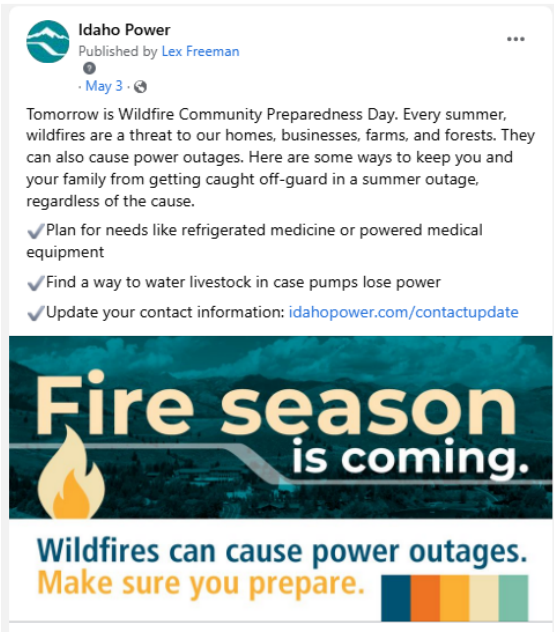
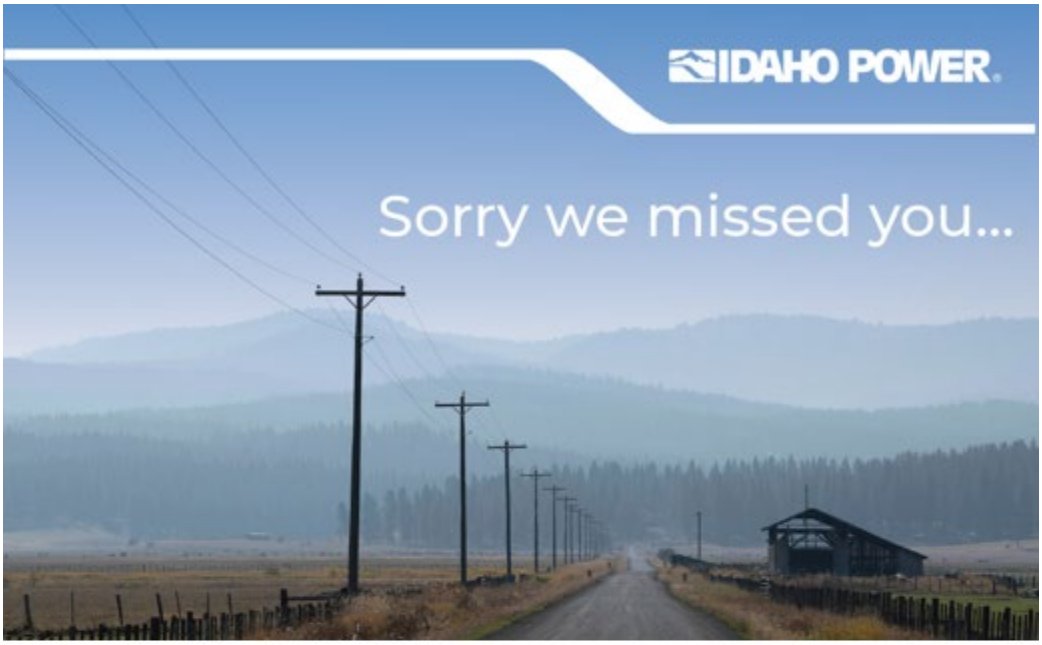


Figure 29
Example social media posts



Our records show you live or own property in an area with higher than normal wildfire risk. It appears the phone number or email address we have for your account is out of date.

Public Safety Power Shutoffs (PSPS) are more likely in your area than others. It's important that we can reach you in case of an emergency, like an unplanned outage. Please take a minute to update your contact information at **idahopower.com/contactupdate** or call us at **208-388-2323**.

Thank you for making sure we can stay in touch!

IDAHO POWER

P.O. Box 70
Boise, ID 83707-0070

Figure 30
Postcard to customer Idaho Power could not reach with contact information on file

Figure 31
July bill insert

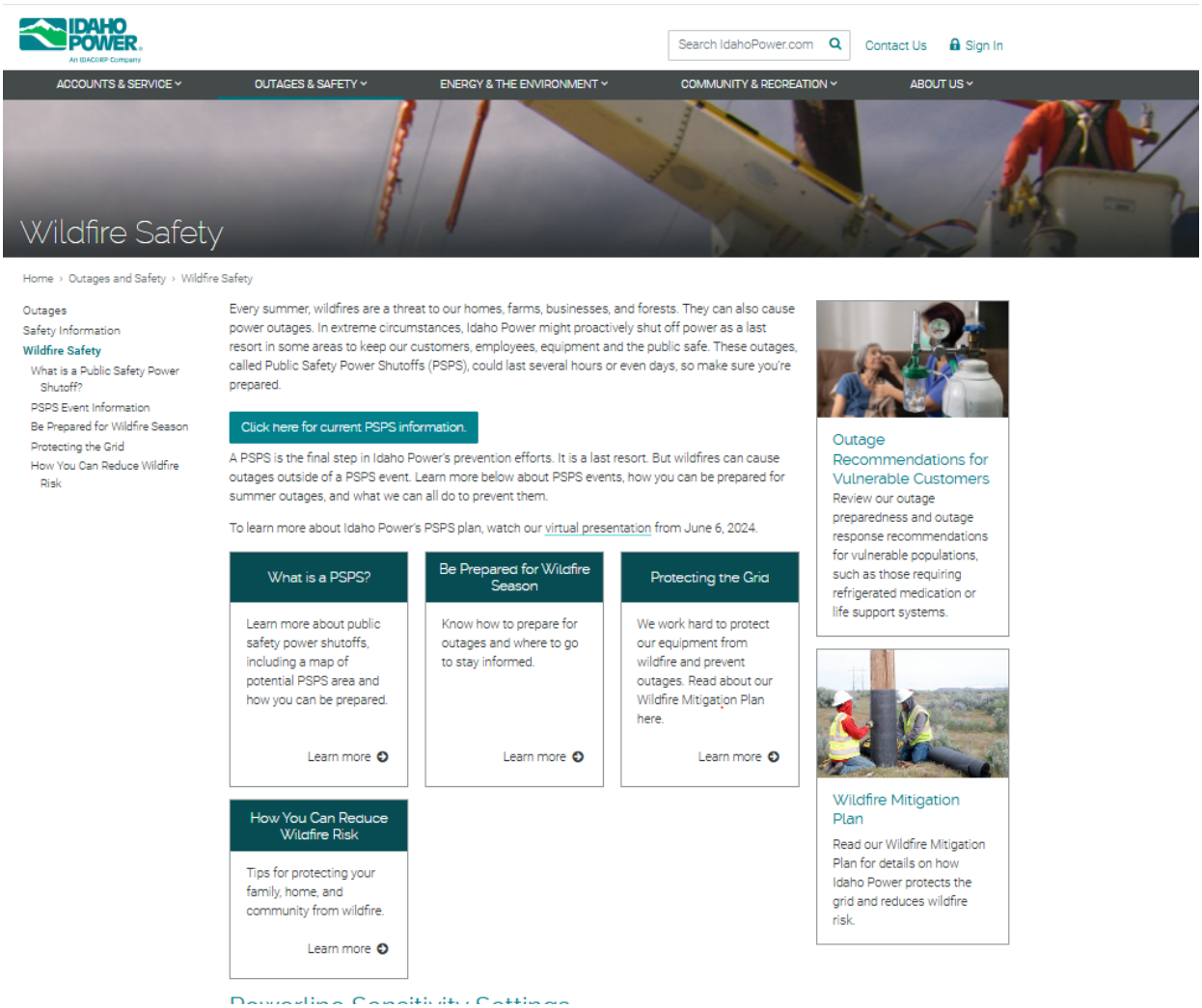


Figure 32
Idaho Power's wildfire safety landing webpage

Figure 33
Idaho Power digital ad, summer 2024

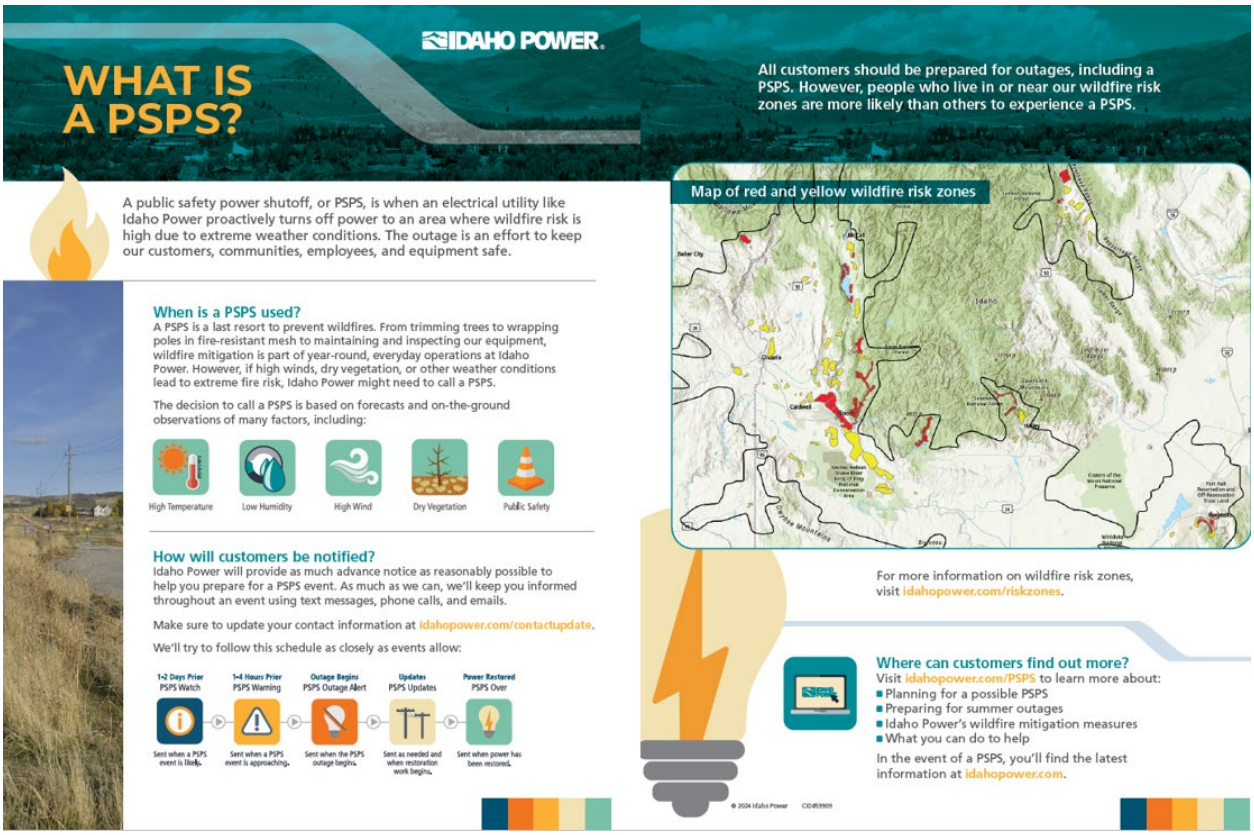


Figure 34
Idaho Power PSPS flyer

10.4.2. Timing of Outreach

Wildfire-related outreach occurs primarily before and during wildfire season. The timing of preseason wildfire outreach timing depends on weather conditions. Holding key communications until wildfire is more prominently on people's minds helps increase the likelihood people will hear and retain the messages. Early communications encourage customers to think about wildfire season, how they could prepare for it, their role in preventing wildfires, and steps Idaho Power is taking to keep the grid safe and reduce wildfire risk. When the potential for wildfire increases, communications shift in tone. Messaging puts more emphasis on asking customers to update their contact information, prepare for wildfire, and help prevent wildfires while recreating.

10.4.3. Communication Metrics

Idaho Power monitors communication activities and uses metrics to evaluate the effectiveness of our outreach efforts and adjust them as needed.

Table 18 summarizes key metrics from Idaho Power's 2024 communication campaign. Idaho Power will continue looking at metrics that help us improve our communications.

Table 18
Key communication metrics

Metric	Definition	Success Criteria	Reason for Metric	Results/Discussion	Considerations for Future
Digital Display Ads—Outage Preparation (May–June) and Wildfire Prevention (July–Sept.)					
Click-through Rate	Number of people who clicked/total number served the ad, expressed as a percentage.	Industry average	Identifies how well customers engage with messaging	These ads on regional website resulted in 2,727 total clicks in Idaho and Oregon to our wildfire landing webpage and a click-through rate of 0.09%, surpassing the click-through rate benchmark of 0.05%. Well above industry average.	The click-through rate was much higher in July (0.13%), suggesting that focusing the messaging during the hot portion of pre-fire season might be beneficial. Recommend looking into responsive display ads—could expand the range of placements, increase overall reach, and provide a more organic appearance, further boosting the click-through rate.
Impressions	Number of times an ad has been served.	Growth in impressions	Helps gauge total reach	These ads on regional websites resulted in 2.9 million impressions.	
Radio—Wildfire Preparedness (May–June) and Prevention (July–Sept.)					
Number of Spots	Total number of spots run, including add-on public safety announcements (PSA)	Count increasing/ leveraging additional free spots as PSAs	Identifies number of customers exposed to messaging	Wildfire-safety radio ad campaign ran in Idaho Falls, Twin Falls, and Boise markets. The Boise market includes eastern Oregon, reaching to Baker City. Campaign included a total of 4,265 paid and PSA match spots—1,204 were in Spanish and played on Spanish language stations.	Consider keeping a radio presence but focusing more of the budget on digital tactics that can reach more people.
Streaming Audio—Wildfire Preparedness (May–June) and Prevention (July–Sept.)					
Impressions	Number of times an ad has been served.	Growth in impressions	Helps gauge total reach	English and Spanish ads ran on services such as Pandora, Amazon Podcast Marketplace, and Spotify, resulting in 349,292 impressions.	Consider shifting some of the traditional radio budget here, where we're seeing lots of reach.
Listen-through Rate	Percentage of ad plays listened to in their entirety	Industry average	Identifies how well customers engage with messaging	Listen-through rate of 99.03% for English ads and 97.50% for Spanish. Well above the industry average.	
Customer Email—Wildfire Season Preparedness (May 2024)					
Number Sent	Total number of emails sent	Customer feedback/count increasing as we have more email addresses	Identifies number of customers receiving the message on widely preferred channel	Delivered to 334,449 customers.	We send this email in May, at the beginning of fire season and Wildfire Preparedness Month. We included other outage preparedness messaging in additional emails. Consider another focused email in July, when the audience seems most engaged with this message.
Open Rate	Percentage of recipients who opened the email	Industry average	Identifies how well customers engage with messaging	Open rate of over 50.4%—well above industry average.	

10.4.4. Customer Feedback

In November 2024, Idaho Power sent a customer survey to its Empowered Community seeking feedback on attitudes about utilities and wildfire, including perceptions of risk and support for mitigation measures. We compared this survey to the October 2023 survey, which the company used to establish a baseline for the effectiveness of our wildfire communication. These surveys help inform outreach efforts in subsequent years. The following are high-level takeaways from the survey:

- **78%** would support the use of PSPS in extreme weather conditions to reduce the risk of wildfire (*up from 71% in 2023*).
- **63%** recalled hearing or receiving information about PSPS from Idaho Power or through the media (*up from 9% in 2023*).
- **43%** recalled getting information about how Idaho Power is working to reduce wildfire risk (*up from 27% in 2023*).
- **61%** recalled receiving information about how to prepare for outages (*up from 34% in 2023*).

2024 WMP Communication Recap

Idaho Power used many tactics in 2024 to inform customers about the company's WMP, efforts to protect the grid from wildfire, how customers can reduce wildfire risk, how to prepare for wildfire-related outages, and PSPS. Outlets included:

- Newspapers—print ads and news coverage
- Radio—paid ads in English and Spanish and news coverage; wildfire-themed interviews on Spanish-language shows
- TV news coverage
- Printed flyers
- Social media
- Bill inserts
- Digital display ads
- Postcards—Used to inform customers of the PSPS program and invitations for public meetings
- Spotify—paid ads
- News releases—Includes news releases with other Oregon utilities
- Customer emails
- Customer newsletters
- Text messages—customers in wildfire risk zones
- Phone calls—customers in PSPS zones
- Emails—customers in PSPS zones

The Idaho Power website continued to provide information related to wildfire safety in 2024:

- Searchable map of PSPS zones by customer address
- Summer outage preparation
- How Idaho Power protects the grid, including mitigation efforts

2024 WMP Communication Recap

- How customers can help prevent wildfires
- An active PSPS event page that provides details of active PSPS areas and outage duration information

Additionally:

- Postcards to all customers in PSPS zones to inform them of program details
- Wildfire themed customer newsletter (*Connections*) to all customers in May
- Wildfire-themed customer email to all customers with email addresses on file (approx. 350,000) in May
- A "pop-up" on the My Account webpage encouraging customers to update contact information
- Post fire-season postcards to all Oregon customers in November for invitation to public meetings
- Customer survey to learn more about customer perception, support, and knowledge of fire-mitigation efforts, including PSPS.

10.5. Idaho Power Internal Communications—Employees

Idaho Power communicated wildfire messages to its employees in a variety of ways:

- *News Scans* for all employees
- Emails
- Leader communications
- GIS-based visual communication of risk zones and affected overhead lines
- Online training for employees influenced by the WMP
- In-person, hands-on, training for certain field employees
- *Say What?*—Short explanations of high-interest topics that may be in the news or circulating on social media

11. Performance Monitoring and Metrics

11.1. Wildfire Mitigation Plan Compliance

The chief operating officer (COO) is the designated oversight officer for the Idaho Power Wildfire Mitigation Plan (WMP). The vice president (VP) of Planning, Engineering and Construction is responsible for compliance monitoring, necessary training, and annual review of this WMP.

11.2. Internal Audit

Idaho Power's internal audit department, Audit Services, periodically conducts an independent and objective evaluation of the WMP to assess compliance with policies and procedures and evaluate achievement of the Plan's objectives. Idaho Power's Compliance department also periodically reviews Idaho Power's compliance with federal reliability standards regarding vegetation management practices.

11.3. Annual Review

Idaho Power conducts an annual review of its WMP and incorporates necessary updates prior to wildfire season.

11.4. Wildfire Risk Map

The Wildfire Risk Map was originally established in 2020 by an external consultant. As noted in Section 3, Idaho Power reconducted risk modeling in 2023 and included updated information on population, vegetation, and climatic conditions. In 2024, Idaho Power began the process of integrating Technosylva Wildfire Analyst Enterprise (WFA-E) software into the company's approach for wildfire risk identification and quantification. WFA-E integration is anticipated to continue throughout the first two quarters of calendar year 2025, with operational capability targeted prior to the start of the 2025 wildfire season. WFA-E is a cloud-based SaaS platform that provides on-demand wildfire spread prediction capabilities to support operational response, consequence-based scenario analysis, and wildfire risk forecasting. WFA-E will be used moving forward to continue to refine Idaho Power's risk mapping process.

11.5. Situational Awareness

Idaho Power will share its Fire Potential Index (FPI) regularly and broadly with Idaho Power personnel and contractors during wildfire season to ensure condition-specific operating

requirements are met. WFA-E, explained in section 11.4 above, will be used in concert with the FPI for situational awareness purposes.

11.6. Wildfire Mitigation—Field Personnel Practices

Idaho Power crews and certain personnel are required to follow the *Field Personnel Practices* when working on lines in Tier 2 and Tier 3 zones during a red FPI. Specific requirements are found in Idaho Power's *Regional WMP Operational Plans* and *Field Wildfire Risk Procedures* documents, which are consulted by such crews working in these areas.

11.7. Wildfire Mitigation—Operations

Each year in preparation for the fire season, Idaho Power reviews and implements:

- Temporary operating procedures for transmission lines during the fire season
- An operational strategy for distribution lines during time periods of elevated wildfire risk during the fire season
- Use of public safety power shutoff (PSPS) as a tool of last resort to prevent Idaho Power transmission and distribution (T&D) facilities from becoming a wildfire ignition source or contributing to the spread of wildfires

11.8. Wildfire Mitigation—T&D Programs

This section lists metrics used to evaluate Idaho Power's asset management and vegetation management programs. The metrics in Table 19 are based on progress made toward completing mitigation activities, such as quantities of inspected units. Work is identified and prioritized each year and approved by executive management. Idaho Power's goal is to complete 100% of the work plan each year; however, emergencies or other unplanned events can occur and disrupt the annual work plan. All work is completed in accordance with safety and applicable requirements and industry standards.

Table 19
T&D programs metrics

Transmission	
Transmission Asset Management Programs	**Description**
Aerial Visual Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition.
Ground Visual Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition.
Detailed Visual (High Resolution Photography) Inspection Program	Perform 10-year cycle patrols and document identified defects according to priority. Complete repairs according to priority definition.
Wood Pole Inspection and Treatment Program	Perform 10-year cycle inspection and treatment and document identified rejects according to priority. Complete replacement according to priority definition.
Cathodic Protection and Inspection Program	Perform 10-year structure-to-soil potential testing on select towers with direct-buried anodes. Perform 10-year rectifier and ground-bed testing on impressed current corrosion protection (ICCP) systems. Annually inspect and record DC voltage and current readings of rectifiers. Complete repairs and adjustments.
Wood Pole Wildfire Protection Program	Install fire mesh wraps on selected poles.
Distribution	
Distribution Asset Management Programs	**Description**
Wood Pole Inspection and Treatment Program	Perform 10-year cycle inspection and treatment and document identified rejects according to priority. Complete replacement according to priority definition.
Line Equipment Inspection Program	Complete annual inspections and data analysis and mitigate defects
Ground Detailed Inspection Program	Perform annual patrols and document identified defects according to priority. Complete repairs according to priority definition.
Thermography (Infra-Red) Inspections	Complete inspections of targeted lines and equipment using thermal imaging (infrared) cameras.
Distribution Infrastructure Hardening Program	Complete annual work plan. Replace "small conductor" with new 4ACSR or larger conductor. Replace or repair damaged conductor. Re-tension loose conductors, including "flying taps" and slack spans as required. Replace wood-stubbed poles with new wood poles. Replace white and yellow square tagged poles with new wood poles. Replace wood crossarm with new fiberglass crossarms. Replace steel insulator brackets with new steel pins/fiberglass crossarms. Replace wedge deadends on primary taps with new polymer deadend strain insulators.

	Replace aluminum deadend strain insulators with new polymer deadend strain insulators. Replace porcelain switches with new polymer switches. Replace hot line clamps. Replace aluminum stirrups. Install avian cover. Relocate arresters. Install bird/animal guarding. Update capacitor banks. Replace swelling capacitors. Replace oil-filled switches with vacuum style. Replace porcelain switches with polymer switches. Replace expulsion arrestors. Install disconnect switches on CSP transformers. Install avian cover. Update down guys Replace/Install down-guy insulators with fiberglass insulators. Tighten down guy. Tighten hardware. Correct third- party pole attachment violations (report to Joint Use department). Replace expulsion fuses.

Vegetation Management

Transmission	**Description**
Pre-Fire Season Inspection and Mitigation	Perform annual pre-fire season inspections no later than June 15 of each year and mitigate noted "hot spots."
Line Clearing Cycles: Strive to maintain 3-year cycle for valley areas & 6-year cycle for mountain areas	Complete annual cycle pruning work plan.
Tree Removals—Hazard Trees	Remove targeted hazard trees.
Targeted Pole Clearing	Complete annually targeted structures.
100% QA/QC Audits in Tier 3 and Tier 2 zones	Complete annually QA/QC audits.
Distribution	**Description**
Pre-Fire Season Inspection and Mitigation	Perform annual pre-fire season inspections no later than June 15 of each year in Tier 3 and Tier 2 zones and mitigate noted "hot spots."
Line Clearing Cycle: Strive to maintain 3-year cycle	Complete annual cycle pruning work plan.
Mid-Cycle Pruning in Tier 3 and Tier 2 zones	Complete annual mid-cycle pruning work plan in Tier 3 and Tier 2 zones.
Tree Removals–Cycle Busters/Hazard Trees	Complete annual cycle pruning work plan.
Targeted Pole Clearing	Complete annually targeted structures.
100% QA/QC Audits in Tier 3 and Tier 2 zones	Complete annually QA/QC audits.

11.9. Long-term Metrics

Idaho Power measures the performance of the WMP and its effectiveness over time in part by tracking outage counts in wildfire risk zones during wildfire season and the progress made toward completing mitigation programs and activities. Vegetation management and grid hardening work is expected to reduce outages and improve reliability in wildfire risk zones.

The following outage causes were established as baseline potential drivers of ignition and are tracked annually for each wildfire risk zone:

- Tree/Vegetation Contact
- Equipment Failure
- Loose Hardware
- Corrosion
- Animal Contact

The use of outage data to gauge overall WMP performance is expected to be a long-term metric and take several years to develop trendlines and averages to draw definitive conclusions and a causal relationship to wildfire mitigation activities. Table 20 summarizes outage counts in wildfire risk zones during the 2024 wildfire season (May 10 through October 20) and provides the percent change compared to a baseline that includes the average annual wildfire season outage counts for the 2019 through 2021 wildfire seasons. It should be noted that Idaho Power implemented Enhanced Protection Settings for the first time during the 2024 fire season, which increased the total number of outages.

Table 20
Outage metrics

Wildfire Risk Zone Outage Metrics–by Cause Code		
Cause Code	**2024 Outage Count***	**% Change Compared to Baseline**
Tree/Vegetation	156	17%
Equipment Failure	65	17%
Small Animal or Bird	116	27%
Corrosion	16	0%
Foreign Object Contact	4	-8%
Loose Hardware	5	7%

* The total number of outage counts during the 2024 wildfire season was 18% higher than the baseline. This is primarily due to the more sensitive Enhanced Protection Settings implemented for the first time during the 2024 fire season.

In 2023, Idaho Power began analyzing and evaluating the effectiveness of overhead circuit "hardening" practices by calculating reliability performance indices and outage rates per

100 line-miles for hardened feeders before and after the hardening work was complete. The reliability performance indices assessed include the System Average Interruption Frequency Index (SAIFI), System Average Interruption Duration Index (SAIDI), and the outage rate for circuits that have had WMP hardening.

Hardened circuits, or "feeders," were compared to baseline feeders, which are defined as all other distribution feeders that do not have completed WMP hardening projects. This analysis is most informative, with several years of actual before and after data to calculate valid comparisons and identify system hardening benefits. There are now approximately two years of history since initial WMP hardening projects were completed in late 2021. Results of the analysis to date indicates improvement by hardening as shown in Table 21. Idaho Power will re-evaluate and calculate specific results over the coming years as more "post-hardening" time has passed.

Table 21
Overhead circuit hardening reliability improvements

Overhead Circuit Hardening Reliability Improvements	
SAIFI % improvement with WMP hardening	25%
SAIDI % improvement with WMP hardening	26%
Outage rate % improvement with WMP hardening	13%

Appendix A
Wildland Fire Preparedness and Prevention Plan

Wildland Fire Preparedness and Prevention Plan

Table of Contents

1. Plan Overview

A. Intent of Plan

The purpose of this Wildland Fire Preparedness and Prevention Plan (Plan) is to provide guidance to Idaho Power Company (IPC) employees to help prevent the accidental ignition and spread of wildland fires (wildfires) associated with employee work activities in locations and under conditions where there is a heightened risk of wildfire. It is expected that all applicable IPC employees be aware of the provisions of this Plan, operate in accordance with the Plan, and conduct themselves in a fire-safe manner.

B. Scope of Plan

The scope of this Plan includes tools, equipment, and field behaviors IPC employees incorporate when working in locations and under conditions where there is a heightened risk of wildfire.

Operations of Transmission and Distribution (T&D) lines facilities, vegetation management, and T&D lines programs that mitigate wildfire risks are not included in this Plan; they are referenced in the separate Wildfire Mitigation Plan.

2. Situational Overview and Applicability

A. Wildfire Season

The provisions of this Plan shall be applicable during wildfire season. Idaho's wildfire season is defined by Idaho Code § 38-115 as extending from May 10 through October 20 each year, or as otherwise extended by the director of the Idaho Department of Lands (IDL). Oregon's wildfire season is designated by the State Forester each year pursuant to Oregon Revised Statute § 477.505 and typically begins in June.

Should any local, state, or federal government land management agency (i.e., the Bureau of Land Management [BLM], U.S. Forest Service, Oregon Department of Forestry, Idaho Department of Lands, etc.) issue any wildfire related order that extends wildfire season beyond that specified above, that agency's order shall govern.

Many variables—such as drought conditions, weather, and fuel moisture—can impact fire potential. Flexibility, judgment, attention to current and forecasted field conditions, and attention to governmental agency issued wildfire orders are necessary such that operational practices can be adjusted accordingly.

B. Wildfire Risk Zones

IPC's Wildfire Mitigation Plan includes a Wildfire Risk Map of IPC's service area. This Wildfire Risk Map may be accessed through geographic information system (GIS) applications. All lands in the vicinity of IPC facilities are mapped as Tier 2 (colored yellow on maps), Tier 3 (colored red on maps) or areas of minimal wildfire risk (i.e., not within a Tier 2 or Tier 3 zone). Tier 2 and Tier 3 zones are designated as wildfire risk zones (WRZ). The provisions of this Plan shall apply to work activities taking place during wildfire season in these WRZs.

C. Fire Potential Index

IPC's Atmospheric Sciences department has developed a Fire Potential Index (FPI) rating system that forecasts wildfire potential across IPC's service area. The FPI considers many current and forecasted elements such as meteorological (winds—surface and aloft, temperatures, relative humidity, precipitation, etc.) and fuel state (both live and dead). The FPI is designed and calibrated for IPC's service area; specifically, those areas in proximity to IPC transmission, distribution, and generation facilities.

The FPI consists of a numerical score ranging from 1 (very green, wet fuels with low to no wind and high humidity) to 16 (very brown and dry, both live and dead dry fuels with low humidity and high temperatures). The FPI scores are grouped into the following three index levels:

- **Green:** FPI score of 1 through 11
- **Yellow:** FPI score of 12 through 14
- **Red:** FPI score of 15 through 16

During wildfire season, IPC will determine a daily FPI as described in Section 5 of the WMP. This weather forecast and FPI dashboard is contained within IPC GIS viewers available to all IPC employees.

D. Decision Making for Field Work Activities

Employees working in the field shall be aware of current and forecasted weather and field conditions. Awareness of these conditions, and exercising appropriate judgment, is essential when considering whether to undertake work activities when combinations of high temperatures, low humidity, dry fuels, and/or wind are present or forecasted to be present.

The following process steps shall apply to employees and crews contemplating field work during wildfire season.

Planned or Scheduled Work Activities

1. Fire Potential Indices:

    1.1. Employees working in the field—NOT working on transmission or primary distribution lines should:

1.1.1. Be aware of the current and forecasted weather and the FPI level for the area where the work will be performed, through the FPI dashboard.

1.1.2. Once the FPI level for the work zone is identified, proceed with work but consider using Prevention—Practices of Field Personnel (see Section 6 of this Plan).

1.2. Employees working in the field—working on transmission or primary distribution lines should:

i. Be aware of the current and forecasted weather and the FPI level for the area where the work will be performed.

1.2.1. Once the FPI level for the work zone is identified, proceed as follows for each FPI level:

1. **Green FPI in All Zones:** Proceed with the work. Evaluate need for utilizing Prevention—Practices of Field Personnel (see section 4 of this Plan).

2. **Yellow FPI in All Zones:** Proceed with the work. Evaluate need for utilizing Prevention—Practices of Field Personnel (see section 4 of this plan).

3. **Red FPI**

   a. **In Normal Zone:** Proceed with the work. Consider and evaluate need for utilizing Prevention—Practices of Field Personnel (see Section 4 of this plan).
   b. **In Tier 2 Zone:** Proceed with the work. However, it is a requirement to follow Prevention—Practices of Field Personnel (see Section 4 of this plan).
   c. **In Tier 3 Zone: STOP.** No planned work activities shall take place unless approved by operations level manager. Work consideration will be restoration of electric service or work deemed critical to providing safe, reliable electric service. If work is approved to proceed it is a requirement to follow Prevention—Practices of Field Personnel (see Section 4 of this plan).

Fire Potential Index (FPI)	**Higher**	15 to 16 (Red)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)	Proceed with Work Utilize Prevention/Practices of Field Personnel **REQUIRED**	**STOP/NO WORK**
	Elevated	12 to 14 (Yellow)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)
	Normal	1 to 11 (Green)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)	Proceed with Work Utilize Prevention/Practices of Field Personnel (Evaluate Conditions and Utilize as Needed)
			None	Tier 2	Tier 3

2. Land Management Agency Restrictions: Follow the requirements and restrictions of any wildfire restrictions related order issued by local, state, or federal land management agencies.

    a) As soon as reasonably practicable, upon receiving knowledge of an order, the Environmental Services department will notify, via email, operations leadership within Power Supply, Customer Operations and Business Development, and T&D Engineering and Construction of wildfire-related requirements and restrictions orders issued by local, state, or federal land management agencies.

Emergency Response and Outage Restoration Work Activities:

Follow the same steps as identified above for planned work activities. However, it is recognized that the nature of emergency response and outage restoration situations will often require exceptions to the above. In these situations, leadership should be consulted, and appropriate judgment should be used given the nature of the emergency or outage at hand.

3. Preparedness—Tools and Equipment

A. Required Personal Protective Equipment

Standard IPC personal protective equipment (PPE) shall be worn in accordance with the IPC *Safety Standard*.

When entering a designated fire area being managed by the BLM or the U.S. Forest Service, additional PPE requirements may be required by those agencies. These typically include:

- Hardhat with chinstrap
- Long sleeve flame-resistant (FR) shirt and FR pants
- Leather gloves
- Exterior leather work boots, 8" high, lace-type with Vibram type soles
- Fire shelter

B. Required Tools and Equipment

Employees NOT working on transmission or distribution lines: Standard tools and equipment in accordance with the IPC *Safety Standard* and Fleet Services.

Employees working on transmission or distribution lines: IPC and the State of Idaho BLM entered into a March 2019 Master Agreement that governs various IPC and BLM interactions, including wildfire prevention related provisions. IPC has elected to also apply these requirements to all work activities taking place on all WRZ in Idaho, Nevada, Montana, and Oregon. These requirements include the following:

- During the wildfire season (May 10–October 20) or during any other wildfire season ordered by a local, state, or federal jurisdiction, IPC, including those working on IPC's behalf, will equip at least one on-site vehicle with firefighting equipment, including, but not limited to:
    - Fire suppression hand tools (i.e., shovels, rakes, Pulaskis, etc.).
    - A 16- to 20-pound fire extinguisher.
    - A supply of water, sufficient for initial attack, with a mechanism to effectively spray the water (i.e., backpack pumps, water sprayer, etc.). This requirement to carry water is dependent on the vehicle type and weight restrictions. For example, a mini-excavator would not be required to carry water since there is no safe way to do so, or a loaded bucket truck may not be required to carry water because of weight limitations.
- At a minimum, equip each truck that will be driven in the WRZs during wildfire season with at least:
    - One round, pointed shovel at least 8 inches wide, with a handle at least 26 inches long
    - One axe or Pulaski with a 26-inch handle or longer
    - A combination of shovels, axes, or Pulaskis available to each person on the crew
    - One fire extinguisher rated no less than 2A:10BV (5 pounds)

- 30 to 200 gallons of water in a fire pumper and 5-gallon back packs

IPC personnel will be trained to use the above tools and equipment to aid in extinguishing a fire ignition before it gets out of control. In the event of a fire ignition, IPC personnel present at the time of the ignition will take action that a reasonably prudent person with that person's training and experience would take to control the fire ignition while still accounting for their own personal safety.

C. Land Management Agency Restrictions and Waivers

The Environmental Services department will notify operations leadership within Power Supply, Customer Operations and Business Development, and T&D Engineering and Construction of any wildfire-related requirements and restrictions orders issued by local, state, or federal land management agencies. Typical orders issued each fire season include the following:

- **BLM**. During BLM's Stage II Fire Restrictions, IPC's Environmental Services department will obtain an appropriate waiver. Field personnel shall take appropriate precautions when conducting work activities that involve an internal combustion engine, generating a flame, driving over or parking on dry grass, the possibility of dropping a line to the ground, or explosives. Precautions include a Fire Prevention Watch person who will remain in the area for 1 hour following the cessation of that activity. Also, IPC personnel will not smoke unless within an enclosed vehicle, building, or designated recreation site or while stopped in an area at least 3 feet in diameter that is barren or cleared of all flammable materials. All smoking materials will be removed from work sites. No smoking materials are to be discarded.

- **State of Oregon Department of Forestry (ODF)**. Prior to each summer fire season, the ODF issues a "Fire Season Requirements" document that specifies required tools, equipment, and work practices. In addition to State of Oregon lands, IPC has elected to apply these requirements to all work activities taking place on all WRZ, BLM lands, and Forest Service lands within the State of Oregon. Go to oregon.gov/ODF/Fire/Pages/Restrictions.aspx for ODF's Fire Season Requirements order.

- Other sites for reference that contain fire restriction orders include the following. This is not an exclusive list. The Environmental Services department is expected to be familiar with sites where land management agencies post relevant orders:

  - Oregon— Blue Mountain Interagency Fire Center at bmidc.org/index.shtml

  - Nevada—Fire Information at nevadafireinfo.org/restrictions-and-closures

4. Prevention—Practices of Field Personnel

A. General Employee Practices

The below listing includes, but is not limited to, practices and behaviors employees shall incorporate depending on the FPI and level of WRZs during fire season.

1. Daily tailboards must include discussion around fire mitigation planning. Discussion topics include, but are not limited to, the following:

    - Items 2 through 7 below
    - Water suppression
    - Hand tools
    - Welding blankets
    - Mowing high brush areas (weed wacker)
    - Watering down the worksite before setting up equipment

2. Weather conditions and terrain to be worked shall be considered and evaluated. Items to be considered include, but are not limited to, the following:

    a) Identify the FPI for the area being worked (see Section 5.2 of the WMP).

    2.1. Monitor weather forecasts, and wind and humidity conditions.

    2.2. Identify surroundings (i.e., wildland-urban interface, BLM lands, Forest Service lands, proximity to any homes and structures, etc.).

    2.3. Identify local fire departments and locations.

    2.4. Evaluate the terrain you are working in (steep or flat).

    2.5. Consider whether the work will occur during the day or at night.

3. Work procedures and tools that have potential to cause a spark or flash shall be considered and evaluated. Items to be considered include, but are not limited to, the following:

    - Performing energized work
    - Grinding or welding
    - Trees contacting electrical conductors

- Hot saws
- Chainsaws
- Weed wackers
- Sawzalls

4. Monitoring the worksite throughout the project.

   It is imperative that all crews and equipment working in the WRZs areas are continuously monitoring and thoroughly inspecting the worksite throughout the project. This includes prior to leaving the work area for the night or before moving on to the next structure.

5. Employee cooking stoves.

- When working in remote locations, often employees bring food that needs to be cooked. Open flames are not allowed. Cook stoves may be permitted by leadership but special precautions must be followed to use them:
  - The stove or grill must be in good repair and of sturdy construction.
  - Stoves must be kept clean; grease build up is not allowed.
  - Fueling of the stove must follow the fueling procedures when liquid fuels are used.
  - Cooking must be in areas free of combustible materials.

6. Smoking on the job site.

- Carelessly discarded smoking materials can result in wildfire ignition. The following practices shall be followed:
  - Do not discard any tobacco products from a moving vehicle.
  - Smoking while standing in or walking through forests or other outdoor areas when IPC's FPI rating is above a Green level is prohibited.
  - All employees must smoke **only in designated areas**, and smoking materials must be disposed of in half-filled water bottles or coffee containers half-filled with sand. Smoking materials shall not be discarded on any site.

7. Post job site inspection.

Final inspection or post-checking the work site for any ignition hazards that may remain is important. Post-checking the work will help ensure the hazards were mitigated and provide a final chance to see if any new hazards or hot spots exist before leaving the work site.

B. Behaviors Relating to Vehicles and Combustion Engine Power Tools

It is important to consider work procedures, equipment conditions, employee actions, potential causes, and other sources that could lead to fire ignition. Some work practices may be performed on roadways that have little to no risk of fire ignition. Leadership should consider scheduling off-road equipment use during times of Green level FPI. Employees should also consider alternative tools, work methods, or enhanced suppression tools to reduce the risk or spread of fire.

1. Additional heat may bring vegetative materials to an easier point of ignition. This includes, but is not limited to, the following vehicles:

    - Pickups
    - Crew cabs
    - Line-beds
    - Bucket trucks (large and small)
    - Backhoes
    - Excavators and rope trucks
    - Any other motorized equipment

2. Vehicle Procedures:

    a) Inspect all engine exhaust, spark arresters, and electrical systems of vehicles used off road daily for debris, holes, or exposed hot components and ensure heat shields and protective components are in place.

    2.1. Conduct inspections of the vehicle undercarriage before entering or exiting the project area to clear vegetation that may have accumulated near the vehicle's exhaust system.

    2.2. Vehicles shall be parked overnight in areas free from flammable vegetation at a minimum distance of 10 feet.

    2.3. Vehicles and equipment will not be stationary or in use in areas where grass, weeds, or other flammable vegetation will be in contact with the exhaust system.

    2.4. If there is no other workable option for the location that doesn't include weeds, grass, or other flammable vegetation, the vegetation and debris will need to be removed.

2.5. Consider using a fire-resistant material, such as a welding blanket to cover flammable material to act as a heat shield; fire blankets may be a suitable option to avoid removal of vegetation.

3. Hot brakes on vehicles and equipment:

a) Park vehicles in areas free of combustible materials.

3.1. Hot brake emergency parking during times of Yellow or Red FPI shall be cleared of combustible materials for a distance of at least 10 feet from the heat source.

4. Fueling procedures:

a) Tools or equipment should NOT be fueled while running.

4.1. A cool-down period must be given to allow equipment time to no longer be considered a fire risk.

4.2. Allow for a 10-foot radius from all ignition sources.

4.3. Clear any combustible debris from the immediate area.

4.4. Never smoke while fueling.

4.5. Designate fueling areas for all gas-powered tools.

5. Combustion engine power tools:

Poorly maintained or missing spark arrester screens may allow sparks to escape and cause ignition of vegetation. Ensure proper spark arrester screens are in place for the following tools:

- Generators
- Pony motors
- Pumps
- Chainsaws
- Hot saws
- Weed wacker
- Brush hog

Inspect spark arresters daily; clean or replace when clogged, damaged, or missing or remove from service until repaired.

5. Reporting

A. Fire Ignition

All fire ignitions shall be immediately reported to regional or system dispatch. Dispatch will notify local fire authorities. All work shall immediately stop, and reasonably prudent steps taken to extinguish the fire with available tools, water, and equipment in light of the individual's training and experience. If the fire gets too large to safely contain or extinguish, ensure all employees are accounted for and get to a safe location.

B. Fire Reporting

When reporting a fire ignition to regional or system dispatch provide the following information:

- Your name
- Location—Reference points, including an address, road or street name, cross streets, mountain range, GPS coordinates, as applicable.
- Fire information
- Size and behavior of the fire
- Weather conditions

6. Training

Each employee who performs work in WRZ shall be trained on the content of this document and be required to complete annual refresher courses through the Workday system. Employees are required to complete fire extinguisher and fire shelter training annually as part of lineman safety compliance. Documentation of all training shall be retained in Workday.

7. Roles and Responsibilities

Employee	1. Be familiar with the requirements specified in this Plan and operate in accordance with this Plan. 2. Be aware of daily weather forecast and FPI level. 3. Be aware of whether field work will be performed in a WRZ.
Crew Foreman and Front-Line Leaders	1. Ensure direct report employees are familiar with and follow Plan requirements. 2. Ensure the crew or team conducts field operations in accordance with this Plan. 3. Be aware of daily weather forecast and FPI level (by viewing the FPI dashboard or by calling into dispatch or a leader): a) Ensure employees are aware of the FPI level. b) Ensure work practices comply with this Wildland Fire Preparedness and Prevention Plan when the FPI is "Red" and the WRZ is Tier 2. c) Ensure no work takes place when FPI is "Red" and the WRZ is Tier 3. Discuss any exceptions with manager. 4. Ensure annual training of employees is completed prior to wildfire season. 5. Ensure required tools and equipment are in place prior to wildfire season.
Manager (Regional Operations Manager, Area Manager, T&D Construction Manager)	1. Ensure crew foremen and front-line leaders understand they are to operate in accordance with Plan requirements. 2. Support crew foremen and front-line leaders in scheduling training and making required tools and equipment available. 3. View daily weather forecast and FPI dashboard: a) Authorize any exceptions to working when FPI is "Red" and the WRZ is Tier 3. b) Ensure specified audits are completed in a timely manner.
Atmospheric Sciences Department	1. Provide daily weather forecast and update the FPI dashboard contained within the IPC Enviro Viewer.
Environmental Services Department	1. Monitor local, state, and federal land management agencies for any wildfire restriction orders issued. 2. Communicate content of any orders issued to Power Supply, Customer Operations and Safety, and Planning Engineering and Construction leadership.
Operations Procurement Department	1. Ensure contractors have a copy of this Plan and contractual requirements are in place to ensure adherence to the Plan.
Vice-President of Planning, Engineering and Construction (VP of PEC)	1. Ensure annual review/update of this Plan is conducted following the completion of each wildfire season.

8. Audit

Prior to the start of wildfire season (May 10), all vehicles associated with work on transmission and distribution lines will be audited by leadership to ensure those working in WRZs are properly equipped with firefighting equipment. The following checklist must be completed, dated, and signed by a member of leadership (front-line supervisor or above) and kept with the crew or individual until fire season has ended (Oct 20). A copy of each audit checklist shall be sent to the respective manager and senior manager.

Wildland Fire Preparedness Audit Checklist
Inspector: _____
Signature: _____
Date: _____
Crew: _____

Line Crew:
At least one vehicle will be equipped with the following:

- ✓ Fire suppression hand tools (shovels, Pulaski, axes, etc.) for each member of the crew
- ✓ A 16- to 20-pound fire extinguisher (or two, 10-pound fire extinguishers)
- ✓ A supply of water, sufficient for initial attack, with an effective spraying mechanism (i.e., backpack pumps, water sprayer, etc.)
- ✓ A 30- to 75-gallon mechanical fire pumper

Individual Truck:

- ✓ One round, pointed shovel at least 8 inches wide, with a handle at least 26 inches long.
- ✓ One axe or Pulaski with a 26-inch handle or longer.
- ✓ A combination of shovels, axes, or Pulaskis to each person on the crew.
- ✓ One fire extinguisher rated no less than 2A:10BV (5 pounds).
- ✓ A supply of water, sufficient for initial attack, with an effective spraying mechanism (i.e., backpack pumps, water sprayer, etc.). This requirement to carry water is dependent on the vehicle type and weight restrictions. For example, a mini-excavator would not be required to carry water since there is no safe way to do so, or a loaded bucket truck may not be required to carry water because of weight limitations.

PPE: IPC and BLM standards. Each employee performing construction or maintenance activities will be required to have the following PPE:

- ✓ Hard hat
- ✓ Safety glasses
- ✓ Hearing protection
- ✓ Long sleeve FR shirt FR pants
- ✓ Leather gloves
- ✓ Exterior leather work boots 8” high lace type with Vibram type soles
- ✓ Fire shelter

Appendix B
Public Safety Power Shutoff (PSPS) Plan

Idaho Power Company's Wildfire Public Safety Power Shutoff Plan

December 2024

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List of Figures

1. Introduction

To keep Idaho Power's customers and the communities it serves safe and continue improving the resiliency of Idaho Power's transmission and distribution facilities, Idaho Power developed and implemented a Wildfire Mitigation Plan (WMP) in 2021. The fundamental goals of Idaho Power's WMP are to reduce wildfire risk associated with the company's transmission and distribution (T&D) facilities and associated field operations as well as to improve the resiliency of Idaho Power's T&D system in a wildfire event, independent of the ignition source. The WMP is reviewed and updated annually.

As part of its operational mitigation practices, Idaho Power developed a Public Safety Power Shutoff Plan (PSPS Plan or Plan) to proactively de-energize electrical facilities when appropriate to reduce wildfire risk. This Plan identifies the relevant considerations, process flow, and implementation protocol before, during, and after a PSPS event. The Plan is active during wildfire season and is reviewed and updated as needed on an annual basis.

2. List of Acronyms

AAR—After Action Review

BLM—Bureau of Land Management

COO—Chief operations officer

ECMWF—European Centre for Medium-Range Forecasts

EMT—Emergency Management Team

ERC—Energy Release Component

F100—100-Hour Fuel Moisture

FPI—Fire Potential Index

FWW—Fire Weather Watch

GBCC—Great Basin Coordination Center

GIS—Geographic Information System

IPUC—Idaho Public Utility Commission

IRWIN—Integrated Reporting of Wildland-Fire Information

LSO—Load Serving Operations

NIFC—National Interagency Fire Center

NOAA—National Oceanic and Atmospheric Administration

NWS—National Weather Service

OPUC—Oregon Public Utility Commission

PEC—Planning, Engineering and Construction

PSPS—Public Safety Power Shutoff

RFW—National Weather Service issued Red Flag Warning

SME—Subject-matter expert

T&D—Transmission & Distribution

TDER—Transmission & Distribution Engineering and Reliability

UKMET—United Kingdom Meteorological Office

VMP—Vegetation Management Program

WMP—Wildfire Mitigation Plan

WRF—Weather Research and Forecasting

3. Definitions

(1) Critical Facilities—Refers to the facilities identified by Idaho Power that, because of their function or importance, have the potential to threaten life, safety, or disrupt essential socioeconomic activities if their services are interrupted.

(2) ESF-12—Refers to Emergency Support Function-12 and is the Idaho Power liaison from the State Office of Emergency Management for energy utilities issues during an emergency for both Idaho and Oregon.[1]

(3) Exercise—Refers to planned activities and assessments that ensure continuity of operations, provide and direct resources and capabilities, and gather lessons-learned to develop core capabilities needed to respond to incidents.

(4) Community—Refers to a group of people that share goals, values, and institutions.[2]

(5) Local Emergency Manager—Refers to a jurisdiction's role that oversees the day-to-day emergency management programs and activities.[3]

(6) Public Safety Partners—As defined by Idaho Power refers to ESF-12, Local Emergency Management, and other agencies as applicable.

(7) Public Safety Power Shutoff or PSPS—A proactive de-energization of a portion of an electric utility's electrical network, based on the forecasting and measurement of wildfire weather conditions.

[1] Federal Emergency Management Institute (FEMA) National Response Framework (NRF) Emergency Support Functions (ESF) National Response Framework | FEMA.gov.

[2] FEMA definition under "Communities" (pg. 26) National Response Framework (fema.gov).

[3] FEMA definition under "Local Government" (pg. 29) National Response Framework (fema.gov).

4. Public Safety Power Shutoff Overview

In recent years, the western United States (U.S.) has experienced an increase in the frequency and intensity of wildland fires (wildfires). A variety of factors contribute to this trend, including climate change, increased human encroachment in wildland areas, historical land management practices, and changes in wildland and forest health. Recent events in western states have increased awareness of electric utilities' role in wildfire prevention and mitigation.

To keep Idaho Power's customers and the communities it serves safe and continue improving the resiliency of Idaho Power's T&D facilities, Idaho Power implemented a WMP in 2021 focused on situational awareness, field personnel safety practices, and operational wildfire mitigation strategies.

As part of its operational mitigation practices, Idaho Power developed a PSPS Plan (or Plan) to proactively de-energize electric transmission and/or distribution facilities during extreme weather events to reduce the risk of wildfire. Based on the inherently disruptive nature of power outages, PSPS events must be carefully evaluated under this Plan to balance wildfire risk with potential PSPS impacts on Idaho Power customers and the communities it serves.

The unpredictable nature of wildfire and weather patterns can create challenges with forecasting when a PSPS event should be implemented. Real-time evaluations and decision-making are therefore important in making PSPS determinations and, depending on the associated wildfire conditions, those determinations may result in a decision not to de-energize or even a proactive de-energization in areas not originally anticipated to be included in a PSPS event.

5. Scope

This PSPS Plan identifies the relevant considerations, process flow, and implementation protocol before, during, and after a PSPS event. The Plan will be active during wildfire season and reviewed and updated as necessary on an annual basis. Wildfire season is defined by Idaho Code § 38-115 as extending from May 10 through October 20 each year, or as otherwise extended by the director of the Idaho Department of Lands (IDL). Oregon's wildfire season generally aligns with Idaho's wildfire season and is designated by the State Forester each year pursuant to Oregon Revised Statute 477.505.

6. Key Tenets

- Advancing the safety of Idaho Power employees, customers, and the general public
- Collaborating with key external stakeholders (agencies, counties, local governments, public safety partners, and first responders)
- Minimizing both potential wildfire risk and power outage impacts on communities and customers
- Maintaining reliable electric service

7. Wildfire Zones

Idaho Power's WMP identifies areas of elevated wildfire risk within its service area using a process explained in the company's WMP. Idaho Power's risk tiers reflect Idaho Power's informed assessment of risk relative to Idaho Power's service area only and not absolute risk. Idaho Power color-codes the tiers—yellow for Tier 2 and red for Tier 3.

In its WMP, Idaho Power identifies operational practices specific to these zones for purposes of reducing wildfire risk associated with the company's T&D facilities and associated field operations and improving the resiliency of Idaho Power's T&D system in a wildfire event, independent of the ignition source. This PSPS Plan sets forth Idaho Power's PSPS evaluation criteria and processes, including operational and communication protocol, for implementing a PSPS.

8. PSPS Implementation Considerations

Idaho Power will initiate a PSPS if the company determines a combination of critical conditions exist that indicate a potential significant wildfire risk associated with Idaho Power's T&D facilities under those known conditions. Idaho Power will evaluate as a whole (not relying on one single factor but a combination of all factors), without limitation, the criteria set forth in sections 8.1 through 8.15 of this Plan. The following subsections list the varying data sources Idaho Power may consider in deciding whether to initiate a PSPS.

8.1. Fire Potential Index

In addition to the risk tier designations in its WMP, Idaho Power developed an FPI to forecast wildfire potential across Idaho Power's service area as described in Section 5.2 of the WMP. This tool is designed to support operational decision-making during fire season. The FPI

converts environmental, statistical, and scientific data into an easily understood forecast of the short-term fire threat, which could exist for different geographical areas in the Idaho Power service area. The FPI is issued for a seven-day period to provide foresight into potential upcoming changes in the FPI, which may trigger operational mitigation efforts, as detailed in the WMP.

The FPI reflects key variables, such as the state of native vegetation across the service area ("green-up"), fuels (ratio of dead fuel moisture component to live fuel moisture component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned a numeric value and those individual numeric values are summed to generate a Fire Potential value from zero to 16, each of which expresses the degree of fire threat expected for each 6-hour period of the seven days included in the forecast. The FPI scores are grouped into the following index levels:

- **Green**: An FPI score of 1 through 11 indicates lower potential for a large fire to develop and spread, as there is normal vegetation and fuel moisture content as well as weak winds and high relative humidity.

- **Yellow**: An FPI score of 12 through 14 indicates an elevated potential for a large fire to develop and spread, as there are lower than normal vegetation and fuel moisture content as well as moderate winds and lower than normal relative humidity.

- **Red**: An FPI score of 15 through 16 indicates a higher potential for a large fire to develop and spread, as there are well below normal vegetation and fuel moisture content as well as strong winds and low relative humidity.

FPI information is provided internally via email, certain Geographic Information System (GIS) viewers, and an FPI dashboard accessible to both Idaho Power employees and contractors from Idaho Power's website. The WMP details operational mitigation efforts when the FPI score is red, including stopping planned work and changing distribution protection operations in certain locations. A Red FPI score is a consideration in Idaho Power's determination of whether to initiate a PSPS.

8.2. National Weather Service Red Flag Warning

A Red Flag Warning (RFW) is a forecast warning issued by the National Weather Service (NWS) to inform the public, firefighters, and land management agencies that conditions are ideal for wildland fire combustion and rapid spread. RFWs are often preceded by a Fire Weather Watch (FWW), which indicates weather conditions that could occur in the next 12 to 72 hours.
The NWS has developed different zones across the nation for providing weather alerts (such as RFWs) to more discrete areas. These zones are shown on this NWS webpage: Fire Weather.
RFWs for Idaho Power's service area include Idaho zones (IDZ) 401, 402, 403, 413, 420 and 422; and Oregon zones (OR) 636, 637, 642, 634, 644, 645 and 646; and are monitored and factored into Idaho Power's determination of whether to initiate a PSPS. Boise and Pocatello NWS

offices will not issue RFWs if fuels are moist and fire risk is low. The following thresholds are used by most NWS offices:

Daytime:

- Relative humidity of 25% or less
- Sustained winds greater than or equal to 10 miles per hour (mph) with gusts greater than or equal to 20 mph over a four-hour period

Nighttime:

- Relative humidity of 35% or less
- Sustained winds greater than or equal to 15 mph with gusts greater than or equal to 25 mph over a three-hour period

Lightning:

- The NWS rarely issues RFWs for lightning in the western U.S. For this to occur, the Lightning Activity Level—a measure of lightning potential specifically as it relates to wildfire risk—needs to be at 3 or higher.

8.3. NWS Fire Weather Forecasts

The NWS provides detailed forecasts for the different weather zones with an emphasis on fire weather indicators (wind speed, relative humidity, lightning potential). A discussion summarizing the weather patterns and highlighting fire threats is included in their extended forecast.

8.4. Publicly Available Weather Models

Idaho Power's Atmospheric Science department uses the following weather models to predict weather timing, duration, and intensity:

- Pivotal Weather Link (pivotalweather.com/model.php): Provides numerical weather data, including a NWS blend of models, European Centre for Medium-Range Weather Forecasts (ECMWF), United Kingdom Meteorological Office weather service information, and GOES-16 satellite information.
- Graphical Weather Link (graphical.weather.gov/sectors/conusFireWeek.php): An NWS website providing weather, water and climate data, forecasts, and warnings for the United States for the protection of life and property. The Fire Weather page provides a

daily and weekly view of multiple weather and environmental conditions influencing wildfire activity.

8.5. Idaho Power Weather Model

Idaho Power maintains its own Weather Research and Forecasting (WRF) model using high-resolution data from Idaho Power's weather stations across its service area. This model, along with publicly available weather models, helps develop weather forecasts that include timing, duration, and intensity of weather systems. An Idaho regional WRF low-resolution map view is available to the public at atmo.boisestate.edu/view/.

8.6. Storm Prediction Center Fire Weather Outlooks

The Storm Prediction Center's Fire Weather Outlook provides a current, one-day-ahead and three- to eight-day forecast for wildfires over the contiguous U.S. This forecast accounts for pre-existing fuel conditions combined with predicted weather conditions that result in a significant risk of wildfire ignition or spread.

8.7. Current Weather Observations

Monitoring real-time weather conditions is important for determining whether the associated risks warrant the need for a PSPS event. Resources available for observing current weather conditions include direct, real-time data from Idaho Power's network of weather stations as well as Remote Automatic Weather Stations, Windy: Wind Map and Weather Forecast, and the National Weather Service National Oceanic and Atmospheric Administration's (NOAA) Weather and Hazards Viewer.

Additionally, Idaho Power's PSPS program includes employees acting as field observers to report on site conditions, detailed in section 8.14.

8.8. National Significant Wildland Fire Potential Forecast Outlook

The National Significant Wildland Fire Potential Forecast Outlook provides wildland fire expectations for the current month, the following month, and a seasonal look at the two months beyond that. The main objective of this tool is to provide information to fire management decision-makers for proactive wildland fire management, reducing firefighting costs, and improving firefighting efficiency.

8.9. GBCC Morning Briefing

The Great Basin Coordination Center (GBCC) is the focal point for coordinating the mobilization of resources for wildland fire and other incidents throughout the Great Basin geographic area, which encompasses Utah, Nevada, Idaho south of the Salmon River, the western Wyoming mountains, and the Arizona Strip. The GBCC hosts a morning briefing during fire season that provides situational awareness for Idaho Power's service area.

8.10. GBCC Current and Predicted ERC and F100

The GBCC as described above also provides day-ahead Energy Release Component (ERC), 100-Hour Fuel Moisture (F100) and other fuel conditions information that helps Idaho Power understand wildfire potential in the service area.

8.11. Fire Agency Input

Idaho Power works with Boise NWS fire forecasters through daily briefings and National Interagency Fire Center (NIFC) Predictive Service forecasters on an as-needed basis, generally regarding data clarification, to streamline the transfer of data, information, and communications about wildland fires that may impact Idaho Power's service area.

Idaho Power works with other agencies, including the U.S. Bureau of Land Management (BLM) and U.S. Forest Service, as wildland fires approach and impact Idaho Power T&D facilities.

8.12. De-Energization Windspeed Considerations

Idaho Power's service area covers 24,000 square miles across southern Idaho and eastern Oregon. The environmental factors across this area vary drastically from high desert landscape to mountainous terrain. Weather and environmental conditions also vary greatly within this area. Regional vegetation becomes "conditioned" to withstand different environmental conditions, which also influences de-energization thresholds. To account for the impact these variations have on fire risk generated by weather conditions, Idaho Power has developed regional windspeed considerations, which it will continue to refine with additional data and weather technology.

8.13. Alternative Protective Measures

Considering the significant potential impact of a PSPS to customers, prior to implementing a PSPS, Idaho Power thoroughly evaluates other potential alternative protective measures for operating its T&D system both during fire season and in the context of a potential PSPS event.

8.14. Real-time Field Observations

Idaho Power may deploy trained field observers to certain potential PSPS locations prior to de-energization to evaluate and report on weather and circuit conditions on-site. Field observers are equipped with mobile weather kits that include wind meters, compasses, and communication devices to report real-time conditions. Information is communicated to the PSPS Assessment Team for consideration during a PSPS event.

8.15. Other

As further described in the WMP, Idaho Power continues to evaluate expansion of its weather forecasting tools and enhance the company's capability to detect and respond to fires with wildfire detection camera systems.

9. Responsibilities

Implementation of the PSPS Plan involves various groups throughout the company. Below is a non-exhaustive list of responsibilities by department, representatives of which will work together to promote organized, consistent, and safe implementation of PSPS events. Idaho Power reserves the right, at its discretion, to adjust roles, personnel, and responsibilities as circumstances warrant.

9.1. Load Serving Operations

- Develop and implement safe and reliable power shutoff protocols and procedures.
- Ensure System and Regional Dispatch employees are appropriately trained to perform relevant responsibilities under this PSPS Plan, and that such employees receive timely information regarding wildfire risk and weather conditions for purposes of performing those responsibilities during a PSPS event.
- Assist with PSPS evaluation and decision-making.
- Safely restore service to PSPS areas when notified by the acting incident commander.
- Participate in After-Action Reviews (AAR) (further discussed in Section 13) and ensure modifications to PSPS protocol are implemented, as necessary.

9.2. Atmospheric Science

- Monitor daily, weekly, and long-term weather forecasts.
- Monitor fuels conditions and trends.
- Monitor FWWs, RFWs, and High Wind Watches and Warnings.
- Communicate with external agencies for increased situational and conditional awareness. Increase communications as conditions or circumstances require.
- Communicate internally to Idaho Power's Transmission & Distribution Engineering and Reliability (TDER) department when conditions or circumstances indicate a PSPS may be necessary.
- Support PSPS activities such as planning, training, and exercises prior to and during fire season.
- Assist in PSPS information-gathering, evaluation, and decision-making during a PSPS event.
- Participate in AARs and ensure modifications to PSPS protocol are implemented, as necessary.

9.3. Transmission and Distribution Engineering and Reliability

- Oversee wildfire mitigation program and support cross-departmental collaboration.
- Develop and implement safe and reliable power shutoff protocols and procedures.
- Act as incident command (IC) for PSPS events.
- Activate PSPS Assessment Team as needed.
- Ensure PSPS activities, such as operations planning, training, and exercises occur annually.
- Coordinate with Atmospheric Science to continue evaluating enhancements to situational awareness capabilities.
- Support Dispatch and Customer Operations in developing de-energization and re-energization plans for PSPS events.
- Support rapid repairs of damaged infrastructure as needed.
- Support Load Serving Operations in planning improvements to PSPS operational capabilities.

- Following de-energization, and when it is safe to do so, coordinate with the Vegetation Management Program (VMP) to begin removal of vegetation debris necessary for re-energization.
- Use reasonable efforts to ensure contract resources are available and prepared for PSPS events.
- Participate in AARs and ensure modifications to PSPS protocol are implemented, as necessary.

9.4. Customer Operations Support and Regional Operations

- Ensure field personnel are appropriately trained to perform all relevant responsibilities under this PSPS Plan.
- Develop and lead training modules for PSPS implementation *(Customer Operations only).*
- Communicate with Oregon and Idaho ESF-12.
- Assist with incident command *(Customer Operations only).*
- Assist in PSPS information-gathering, evaluation, and decision-making.
- Ensure crews and equipment are available to support PSPS events.
- Perform field observations, line patrols, and other PSPS tasks, as necessary.
- Perform required repairs to safely re-energize the system after a PSPS event.
- Request/obtain air patrol contractors for line inspections as required following a PSPS event.
- Participate, with assistance from Corporate Communications, in Idaho Power's general external education campaign.
- Ensure a coordinated and cohesive external and internal communication and notification plan is in place and reviewed annually.
- During PSPS phases, collect and maintain Regional Dispatch Operations logs and other incident information for reporting purposes.
- Develop, with assistance from Corporate Communications, a cohesive notification framework with public safety partners, and consistently evaluate ways to increase communication and outreach effectiveness.

- Engage with public safety partners and critical facilities before, during, and after a PSPS event.
- Coordinate with emergency managers to deploy community resource centers, as necessary.
- Lead AARs and ensure modifications to PSPS protocol are implemented, as necessary.

9.5. Substation Operations

- Monitor substations and perform actions to support PSPS operations as required.
- Coordinate activities with Dispatch and Customer Operations.
- Participate in AARs and ensure modifications to PSPS protocol are implemented, as necessary.

9.6. Corporate Communications

Corporate Communications develops and executes PSPS communications to Idaho Power customers and employees and supports other business units in their communication efforts with regulators, critical facility operators, public safety partners, and other stakeholders.

Corporate Communications will:

- Work with public safety partners, critical facilities, regulators, and other stakeholders (in coordination with Customer Operations and Regulatory Affairs) to develop a comprehensive, coordinated, and cohesive customer notification framework.
- Develop and implement—with input from public safety partners—a wildfire education and awareness campaign focused on wildfire prevention and mitigation, PSPS awareness, and outage preparedness for customers.
- In the event of a PSPS:
    - To the extent possible and in coordination with Customer Service and Information Technology (IT), notify customers before, during, and after a PSPS event with the following information:
        - Expected timing and duration of the PSPS event
        - 24-hour contact information and website resources
    - Provide up-to-date information on a dedicated Idaho Power PSPS webpage prominently linked on the Idaho Power homepage.

- Distribute information via media and social media channels.

- Participate in AARs and modify communication practices, as necessary.

9.7. Safety

- Ensure safety professionals are appropriately trained to perform all relevant responsibilities as needed under the PSPS Plan.
- Provide training on the PSPS Plan requirements for field personnel.
- Participate in AARs and modify communication practices, as necessary.

9.8. Customer Service

- Respond to customer calls and questions about a PSPS event with information provided by Corporate Communications or the IC.
- Ensure customer service representatives are trained to manage customer interactions during a PSPS event.

10. PSPS Operations

10.1. Preparedness

PSPS preparedness is a continuous effort involving Idaho Power, public safety partners, state and local governments, communities, and customers. The TDER department coordinates and facilitates activities of Idaho Power business units for wildfire prevention and mitigation activities, while Customer Operations and Corporate Communications facilitate public outreach and coordination efforts with external stakeholders. Figure 1 shows the PSPS preparedness cycle.

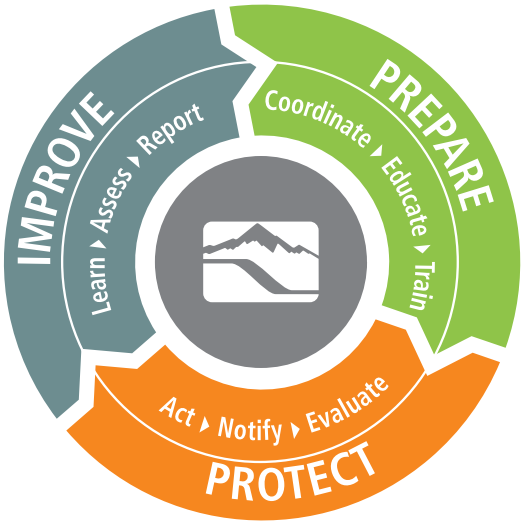

Figure 1
PSPS preparedness cycle

Idaho Power's goal is to take a community approach to wildfire preparedness by educating and encouraging individual preparedness and relying on existing protocols and procedures currently available through local governments and emergency response professionals. Idaho Power uses metrics and monitoring of certain communication activities to evaluate the effectiveness of outreach efforts and adjusts as needed based on feedback from customers and public safety partners.

10.1.1. Community Preparedness

Idaho Power communicates with customers and public safety partners before and throughout wildfire season through a variety of platforms to inform them of steps the company is taking to reduce wildfire risk and ways they can help prevent wildfires and prepare for outages. Communication themes include the following:

- *What is a PSPS?*: Explanation of PSPS events, including a map customers can use to determine if their homes or businesses are in either a Tier 3 or Tier 2 risk zone.
- *Be Prepared for Wildfire Season and PSPS events*: Preparation tips like building an outage kit and planning for feeding livestock, etc.
- *Protecting the Grid*: Measures Idaho Power is taking to enhance grid resiliency and reduce wildfire risk.

- *How You Can Reduce Wildfire Risk*: Tips for preventing wildfires when camping, using fireworks, hauling trailers, etc.
- *PSPS Event Information*: Real-time information on active PSPS events, estimated shutoff time, outage duration, and customers impacted.

10.1.2. Training and Exercises

Idaho Power coordinates and participates in tabletop exercises with public safety partners at reasonable intervals to enhance knowledge of each other's emergency operations and ensure smooth interactions during PSPS events.

10.2. Wildfire Season Operations

As described here and in Idaho Power's WMP, normal operations during wildfire season differ from normal operations during the rest of the year based on heightened requirements specifically targeted at forecasting and reducing wildfire risk.

10.2.1. Situational Awareness Activities

During wildfire season, Idaho Power closely monitors fire conditions and weather patterns. Idaho Power's Atmospheric Science team prepares a monthly "Seasonal Wildfire Outlook" report beginning in April and continuing through wildfire season containing information on regional drought conditions obtained from the National Drought Monitor, weather and climate outlook, seasonal precipitation, and temperature outlooks from NOAA, the NWS, and a regional wildfire outlook.

During wildfire season, the Atmospheric Science team will determine a daily FPI as described in Section 5.2 of the WMP describing shorter-term weather and fire conditions specific to wildfire risk zones across Idaho Power's service area.

10.2.2. Key Grid Interdependent Utilities and Agencies

Idaho Power exchanges dispatch information with key grid interdependent utilities and energy providers to expedite communication and coordination during wildfire events. These contacts include Avista, Bonneville Power Administration, Northwestern Energy, NVEnergy, Oregon Trail Electric Cooperative, PacifiCorp, Raft River Electric, Seattle City Light, and the U.S. Bureau of Reclamation. Idaho Power also exchanges dispatch information with NIFC, BLM Fire Dispatch, and various National Forest Service district offices—including Idaho Power dispatch receiving BLM and U.S. Forest Service incident command information during wildfire events—to improve communication and coordinate fire-related activities.

10.3. Proactive Communications

Although the size of Idaho Power's service area, geographic and environmental diversity, and unpredictable nature of Idaho and Oregon weather make it challenging, Idaho Power is committed to providing as much advance notice as reasonably possible in preparation for a PSPS event. Figure 2 provides the communication timeline Idaho Power utilizes, to the extent possible, for PSPS events, including notifications to public safety partners, circumstances permitting.

10.3.1. Notifications and Emergency Alerts

Consistent with Oregon Division 300 Administrative Rules and Emergency Support Function-12, Idaho Power coordinates with public safety partners in advance of a PSPS event to prepare information needed by these partners and establish communication protocols for critical decision-making before and during a PSPS event, including restoration activities.

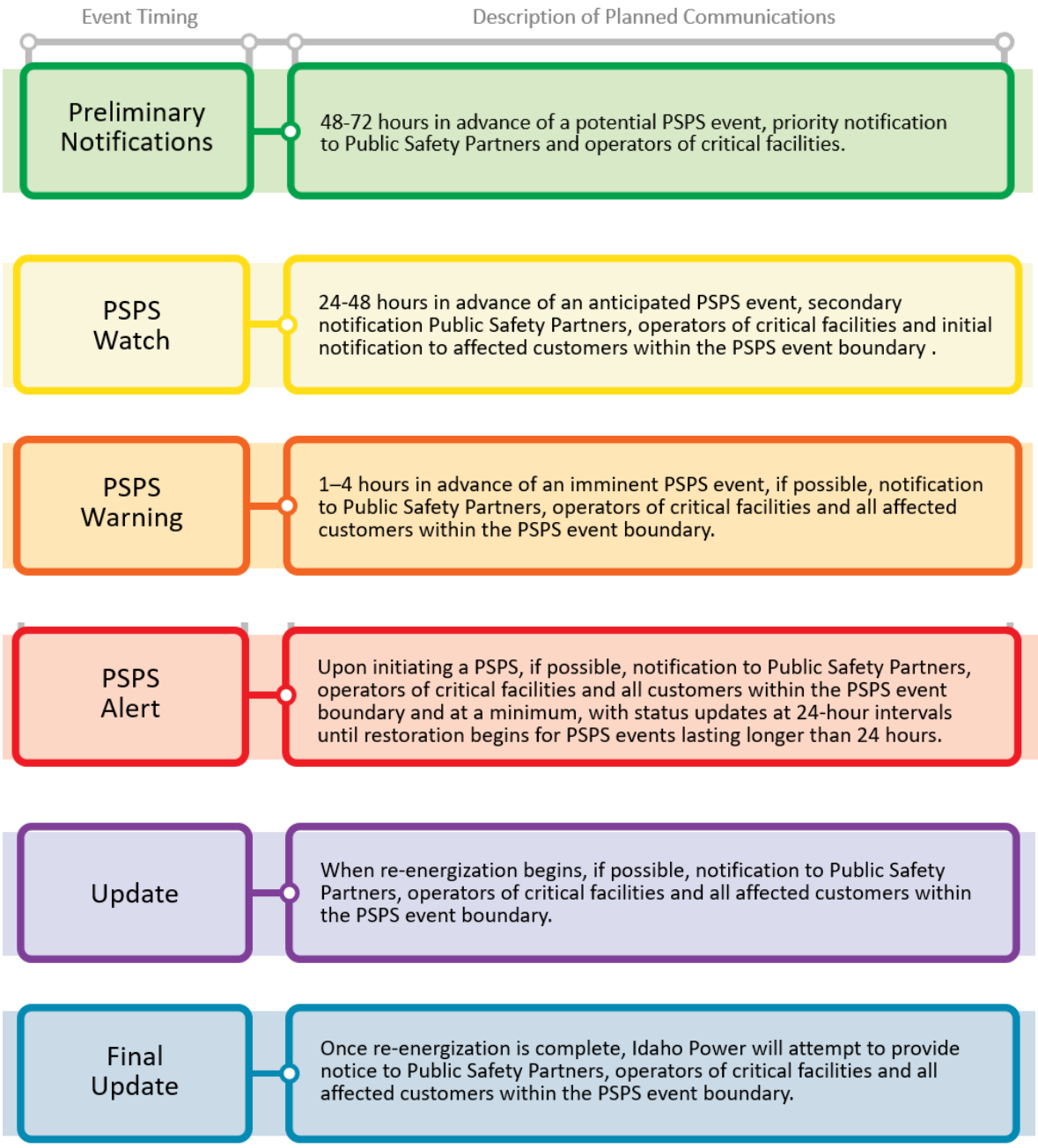

Figure 2
Possible PSPS event communication timeline

10.4. PSPS Phases

10.4.1. Phase 1 & PSPS Assessment Team Activation

The decision to implement a PSPS event will be based on the best available data for weather and other fire-related conditions as detailed above in Section 8—PSPS Implementation Considerations. Multiple events may require simultaneous management of other storm-related outages or other PSPS events.

Idaho Power will transition from normal wildfire season operations to Phase 1 of a PSPS event at the direction of the Wildfire Mitigation and T&D Engineering director or designee. During Phase 1, Idaho Power will activate the PSPS Assessment Team, which includes representation from a minimum of the departments identified in Section 9. The Wildfire Mitigation and T&D Engineering director or designee will establish an incident commander for the event to lead the PSPS Assessment Team during the phases of the PSPS event. The PSPS Assessment Team will hold meetings and/or conference calls (collectively referred to as meetings) as needed to discuss current and forecasted weather conditions and other information regarding a potential PSPS event. The IC will facilitate PSPS Assessment Team meetings and the PSPS Assessment Team will be responsible for recommending maintaining Phase 1, escalating to Phase 2, or de-escalating to normal operations. The PSPS Assessment Team will also recommend issuance of preliminary notifications of a potential PSPS event to customers, public safety partners, critical facilities operators, and ESF-12 leads consistent with Oregon Division 300 Administrative Rules and Emergency Support Function-12.

During Phase 1, the PSPS Assessment Team will review the PSPS Plan and supporting documents. The team will perform an operational risk assessment to develop a recommendation for PSPS escalation. The ultimate determination on whether to escalate to Phase 2 is made by the IC. As soon as reasonably practicable following a Phase 2 notification, the full PSPS Assessment Team will be placed on standby, and team member availability will be determined. In addition, the vice president (VP) of Planning, Engineering, and Construction (PEC), the Customer Operations VP, and chief operations officer (COO) or their designees will be placed on standby for decision making purposes.

10.4.1.1. Phase 1 Notifications

Depending on the timing and specific circumstances of the PSPS event, public safety partners and critical facility operators may be notified during this phase. These notifications may include emails, text messages, and/or phone calls as determined by the PSPS Assessment Team in coordination with Corporate Communications.

10.4.2. Phase 2

Phase 2 actions are determined by additional situational awareness activities and timing of forecasted weather events. Upon transitioning to Phase 2, Idaho Power will provide external notifications as detailed in Figure 2, as determined by the PSPS Assessment Team in coordination with Corporate Communications.

10.4.2.1. Regional Event Operations and Coordination

In collaboration with the PSPS Assessment Team, Idaho Power regional leadership will establish a regional event coordinator. The event coordinator's main role is to coordinate activities across the region associated with the PSPS event and restoration of electric service, as needed, following a PSPS event.

Regional Operations personnel have developed action plans and switching orders as part of their preparedness activities. These plans and switching orders will be reviewed and refined as necessary based on the current and forecasted conditions and will include situation-specific tactics and detailed instructions.

10.4.2.2. Conduct Operational Risk Analysis

The PSPS Assessment Team will present its operational risk analysis recommendation to the VP of Planning, Engineering and Construction (PEC), VP of Customer Operations, and/or the COO or their designees, who will then evaluate the PSPS Assessment Team's recommendation for final determination. However, all three positions may not be available during an event. In this case, any one of the three positions (i.e., the VP of PEC, VP of Customer Operations, or COO) have the authority to make a final determination of whether to proceed to Phase 3 implementation of a PSPS event based on the PSPS Assessment Team recommendation.

10.4.2.3. Request to Delay a PSPS Event

There may be requests to delay proactive de-energization from the public safety partners or ESF-12. This may occur for several reasons, with the most anticipated being an impact to a customer's or fire response agency's ability to pump water for fire suppression during the outage. Delay requests may be routed through dispatch and will be sent to the PSPS Assessment Team for evaluation. The PSPS Assessment Team will provide the VP of PEC, VP of Customer Operations, and/or the COO (or designee) a recommendation on whether to approve the proactive de-energization delay. The decision will be made by the VP of PEC, VP of Customer Operations, and/or the COO (or designee). As soon as practicable after receiving the request, Idaho Power will notify the ESF-12 liaison of the delay request and basis of such request, as well as the final determination and the underlying justification.

10.4.2.4. Field Observations and Response Teams

TDER and Regional Operations will coordinate field personnel to be mobilized and dispatched to strategic locations, including areas with limited weather and system condition visibility, to perform field observations for on-the-ground, real-time information critical to inform decisions on proactive de-energization. Field observations include—without limitation—conditional assessments of system impacts from wind and vegetation, flying debris, and slapping conductors.

10.4.2.5. Customer and Community Notifications

Depending on the timing and specific circumstances of the PSPS event, Idaho Power may use various forms of communication (including media outreach) to provide information and updates to public safety partners, critical facility operators, and customers—particularly those impacted by the PSPS event. Information and updates will include the reason for the potential de-energization, where to find real-time updates on outage status, and other relevant safety and resources.

10.4.3. Phase 3

Upon determination to proactively de-energize, the Load Serving Operations (LSO) representative of the PSPS Assessment Team will inform System and Regional Dispatch Operations and request coordination of the estimated time to begin the PSPS. The regional manager, or their assigned representative in the region where the PSPS will take place, will coordinate with the event coordinator to pre-position field personnel where manual de-energization is required and to stand by for orders to de-energize. System and Regional Dispatch Operations will implement the PSPS according to their established processes.

10.4.3.1. Customer and Community Notification

Idaho Power will use various forms of communication (including media outreach) to provide information and updates to customers and other stakeholders, particularly those impacted by the PSPS event. Information and updates will include the reason for the de-energization, where to find real-time updates on outage status, and other relevant safety and resource information regarding the PSPS.

10.4.4. Phase 4

10.4.4.1. System Inspections

When it is safe to do so, Idaho Power will begin line patrolling activities to inspect T&D circuits and other potentially impacted Idaho Power facilities prior to re-energization. Patrol personnel

will report system conditions back to System and Regional Dispatch Operations for coordination with field crews. Patrols will be performed to ensure conditions and equipment are safe to re-energize.

10.4.4.2. Repair and Recovery

Line crews will repair T&D facilities as coordinated with System and Regional Dispatch Operations, replacing damaged equipment and performing other actions to support safe re-energization of the T&D system.

10.4.4.3. Incident Management Support

The PSPS Assessment Team will continue to monitor fire and weather conditions throughout the event. Logistics and mutual assistance requirements will be determined and acted upon per existing internal plans and processes. If re-energization will be delayed longer than anticipated due to the magnitude of the event, the Emergency Management Team (EMT) will be utilized for additional support.

10.4.4.4. Communicate PSPS Event Conclusion

Idaho Power will use various forms of communication (including media outreach) to inform customers and other stakeholders, particularly those impacted by the PSPS event, when repairs are complete, and it is safe to re-energize the system. This may occur in stages as different feeders or feeder sections are repaired and safe to re-energize. The outage map on Idaho Power's website will be updated during the event. Idaho Power will also leverage existing public agency outreach and notification systems as done at other points in the PSPS process.

10.4.4.5. Re-energization

Once re-energization activities are completed and service is restored, crews and support staff will demobilize and return to normal wildfire season operations as described in the WMP.

10.4.5. Post-incident Review

During PSPS phases, the Customer Operations lead will collect and maintain Regional Dispatch Operations logs and other incident information required for reporting purposes.

Following conclusion of a PSPS event, the Customer Operations lead, or their designee will conduct informal, high-level debriefs to identify potential modifications to PSPS protocol based on lessons learned during the event. The assigned representative will consolidate the feedback and file as part of the incident documentation.

Also following the PSPS event, the IC will conduct an AAR with the PSPS Assessment Team to identify potential modifications to PSPS protocol based on lessons learned during the event. The IC will consolidate the feedback and provide it to the Customer Operations lead.

After wildfire season, the Customer Operations lead may conduct an AAR focusing on operational processes, communications, customer support, as well as emergency response and restoration. Idaho Power may also request feedback from external stakeholders on coordination efforts, communications, and outreach effectiveness for integration into the AAR report.

11. Financial Administration

Idaho Power will track expenses related to PSPS events for Public Utility Commission of Oregon (OPUC) and Idaho Public Utilities Commission (IPUC) reporting and potential recovery of expenses through regulatory processes. Expenses will be tracked for the entire PSPS event (Phase 1 through conclusion of the Post-Incident Review and filing the PSPS event report with the OPUC) to include, without limitation, time reporting, equipment, and any supplies used to set up customer resource centers and provided to customers (e.g., water, ice, etc.).

12. Reporting

Employees are required to manage information regarding PSPS events pursuant to Idaho Power's *Information Retention Policy* and underlying standards. Idaho Power will submit reports to the IPUC and OPUC as required.

13. After-Action Report

An AAR is a structured review or de-brief process used to evaluate the effectiveness of the Plan and potential areas for improvement. This process may be performed after a PSPS event and may be confidential at the direction of Idaho Power's general counsel or designee.

14. Training

Idaho Power will provide annual training, prior to or shortly after the beginning of wildfire season, to relevant employees on their respective roles in performing this PSPS Plan.

15. Exercises

Idaho Power will exercise this PSPS Plan on an annual basis prior to wildfire season using various scenarios and testing all or any portion(s) of the Plan which may include:

- Testing text and/or phone alerts with a test group of public safety partners
- Testing tactical operational plans, such as reporting field observations or positioning employees at manually operated disconnects to test timing for de-energization and field inspections of T&D assets
- Discussing and/or practicing roles and responsibilities of both strategic and tactical operations, including decision-making handoffs and hypothetical scenarios
- Discussing and/or developing re-energization plans
- Testing capacity limits on incoming and outgoing communications systems

Appendix C
Wildfire risk zone map book

Wildfire Risk Zone Map Book

List of Figures

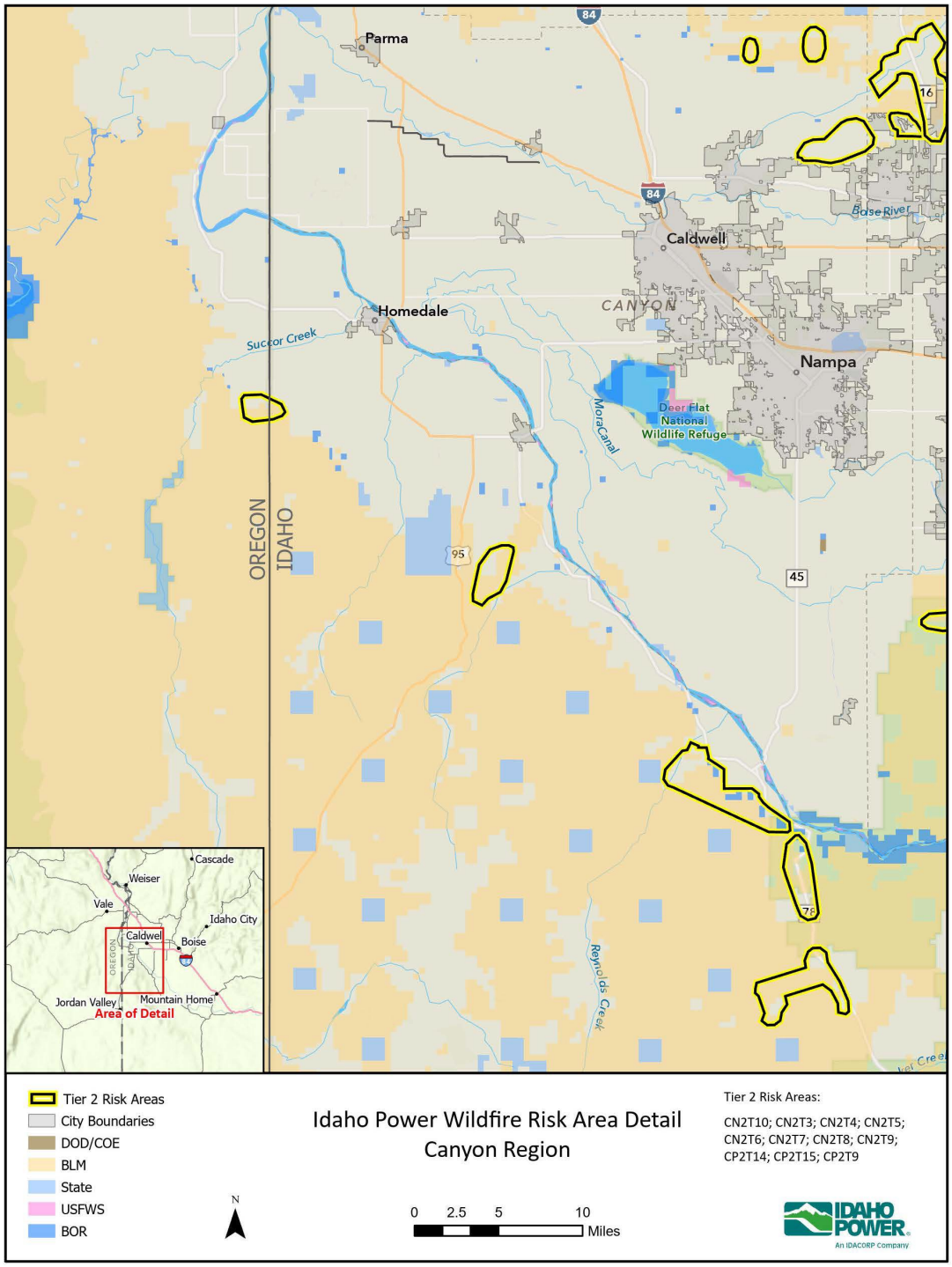

Figure 1
Canyon Region—Tier 2 zones

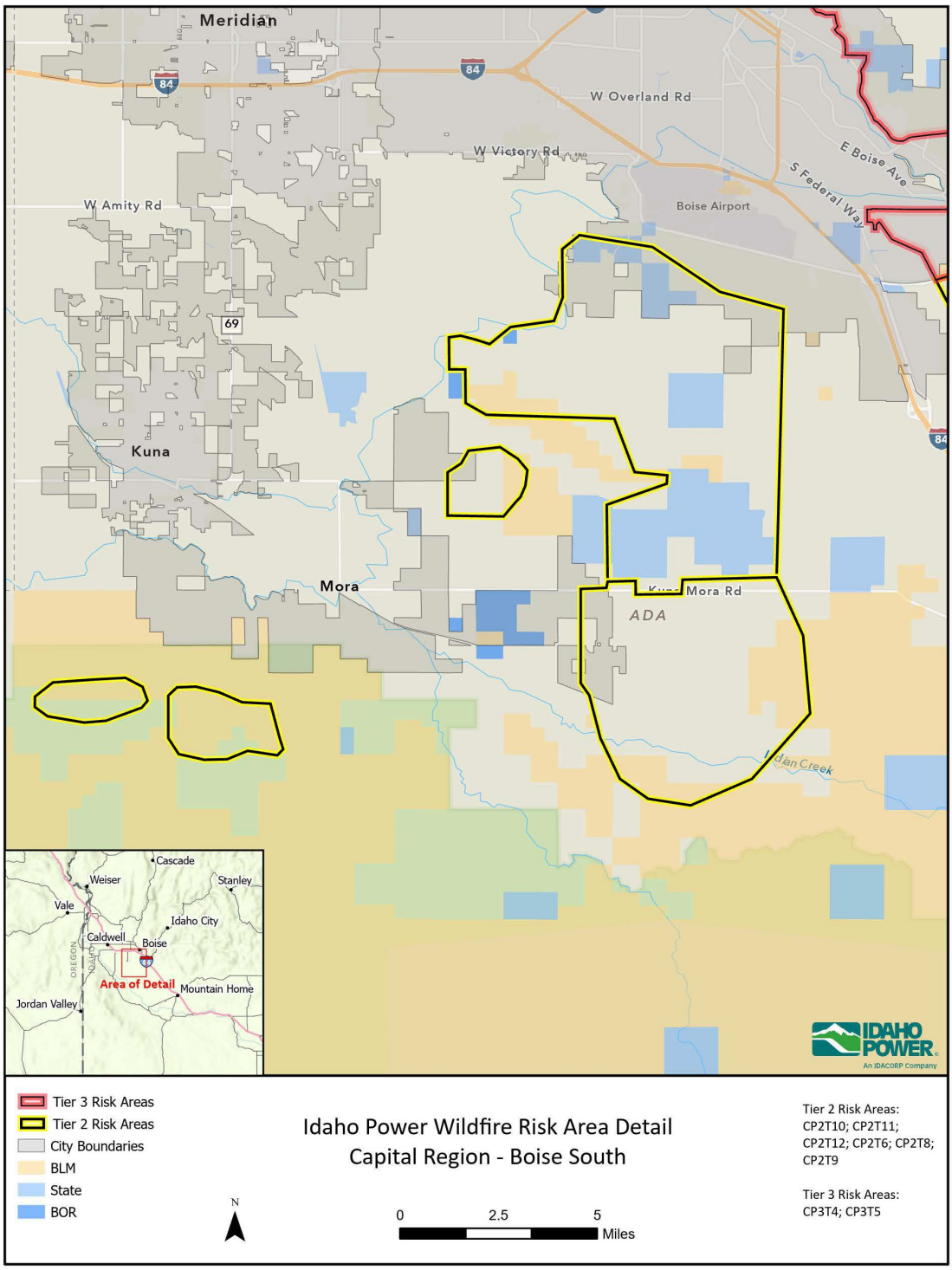

Figure 2
Capital Region–Boise south

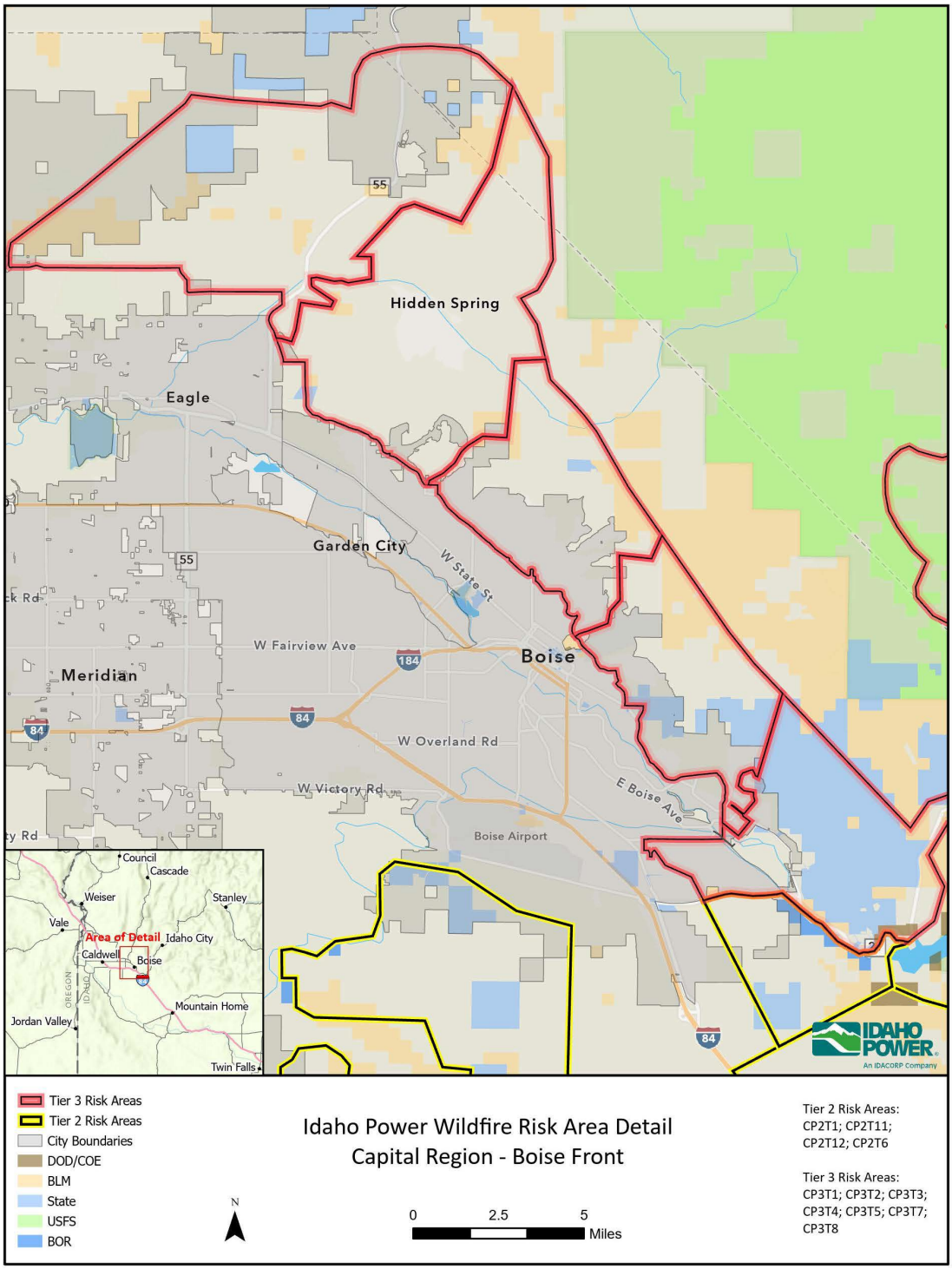

Figure 3
Capital Region–Boise Front

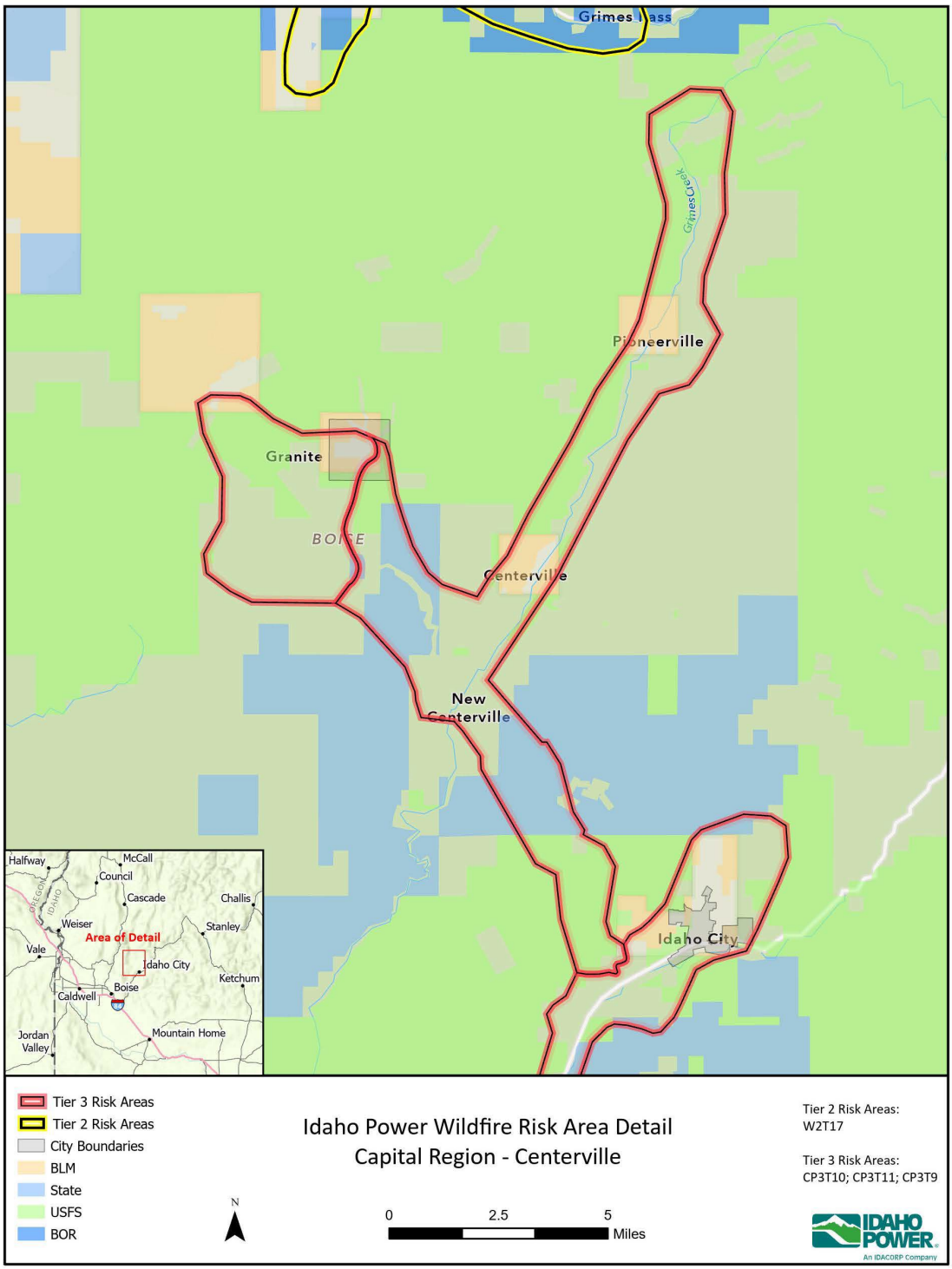

Figure 4
Capital Region–Centerville

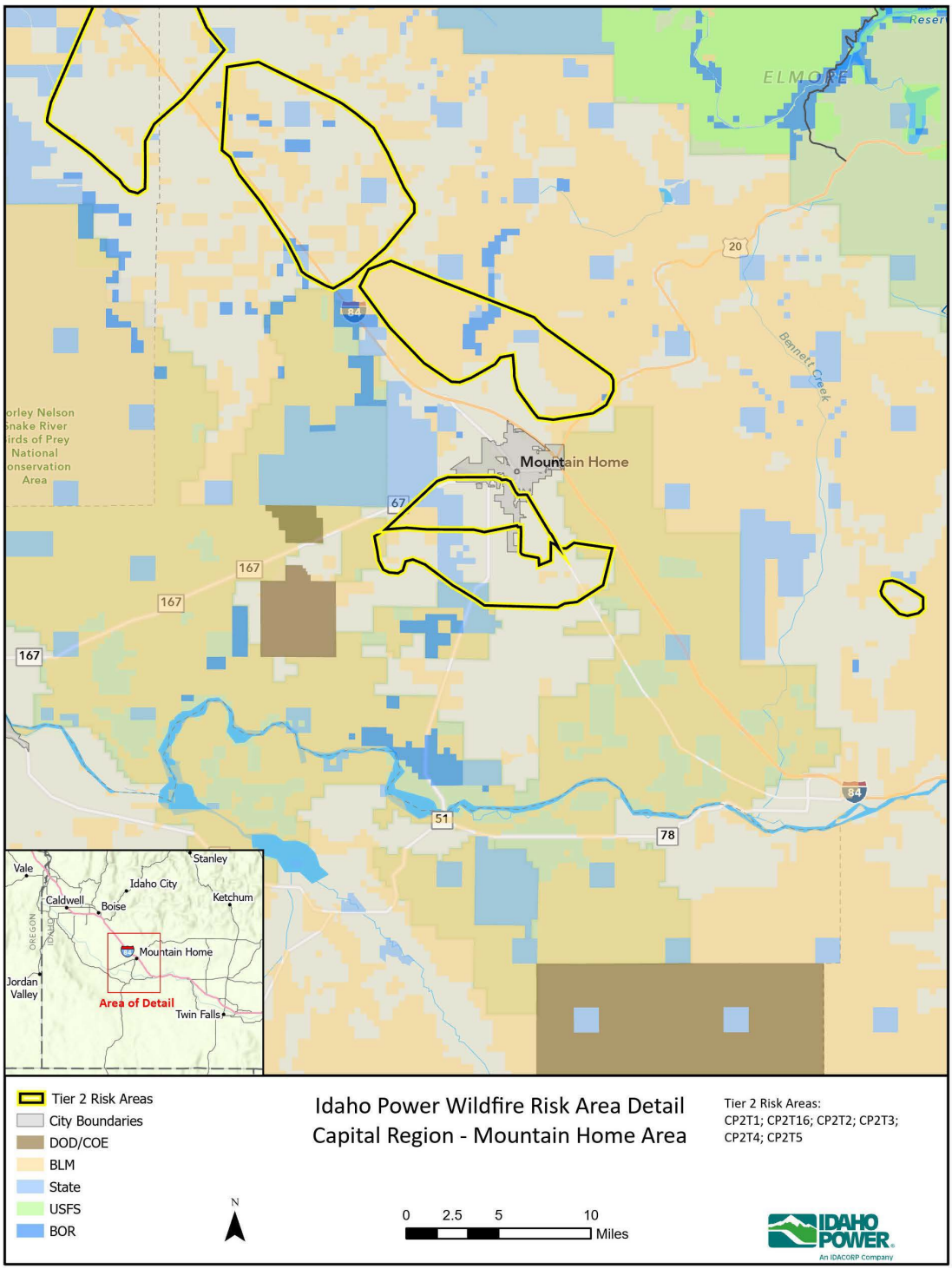

Figure 5
Capital Region–Mountain Home area

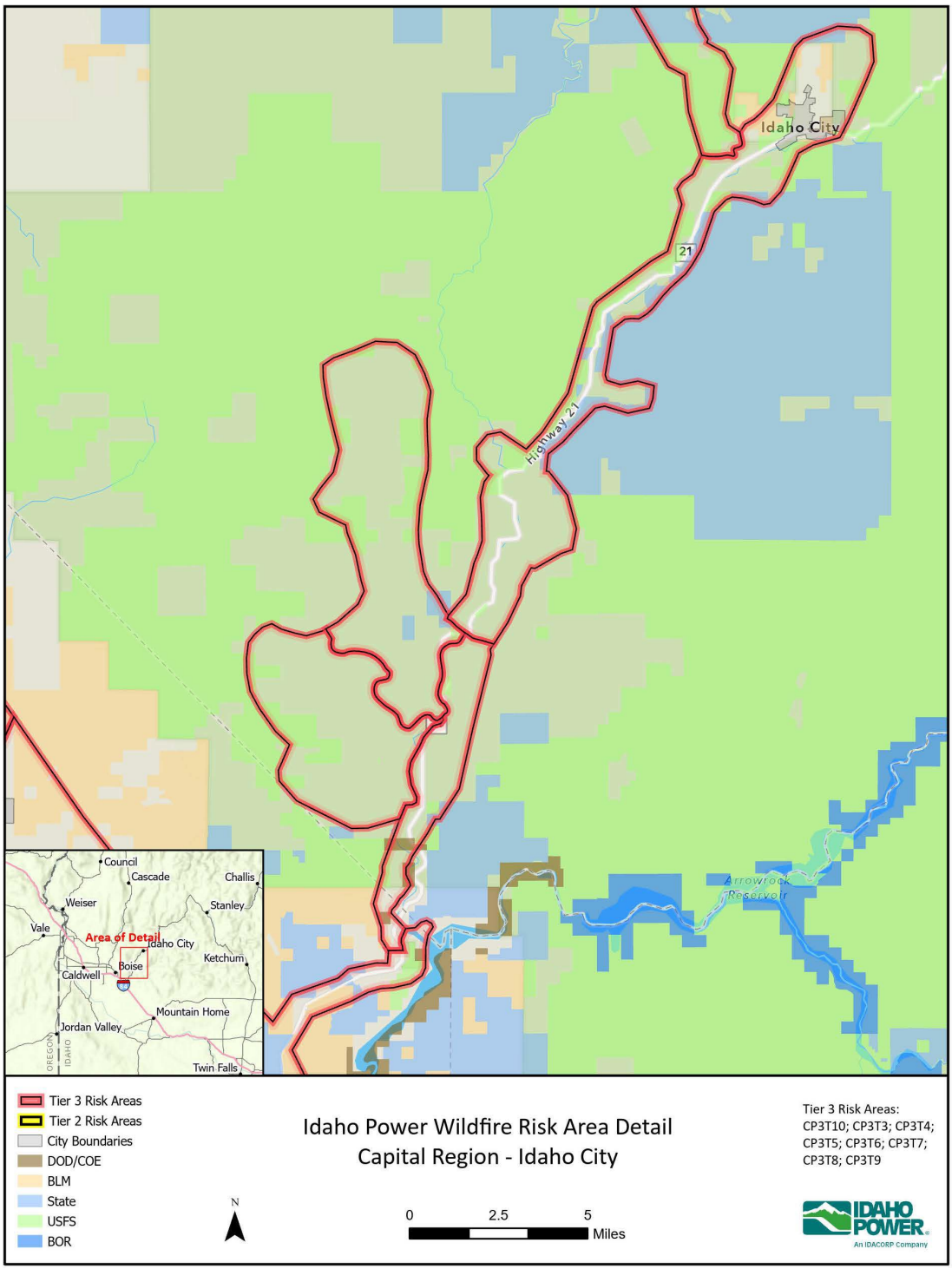

Figure 6
Capital Region–Idaho City

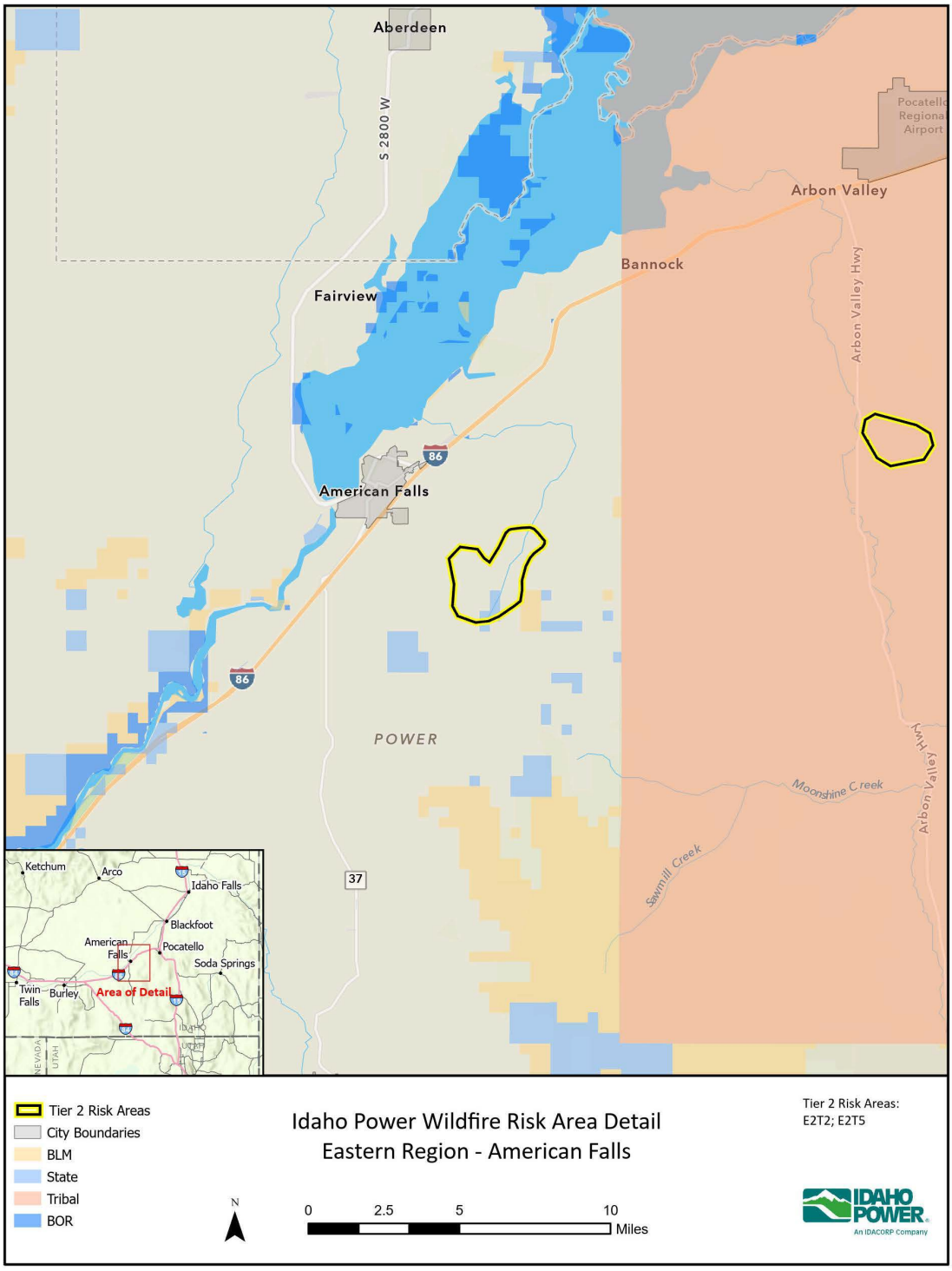

Figure 7
Eastern Region—American Falls

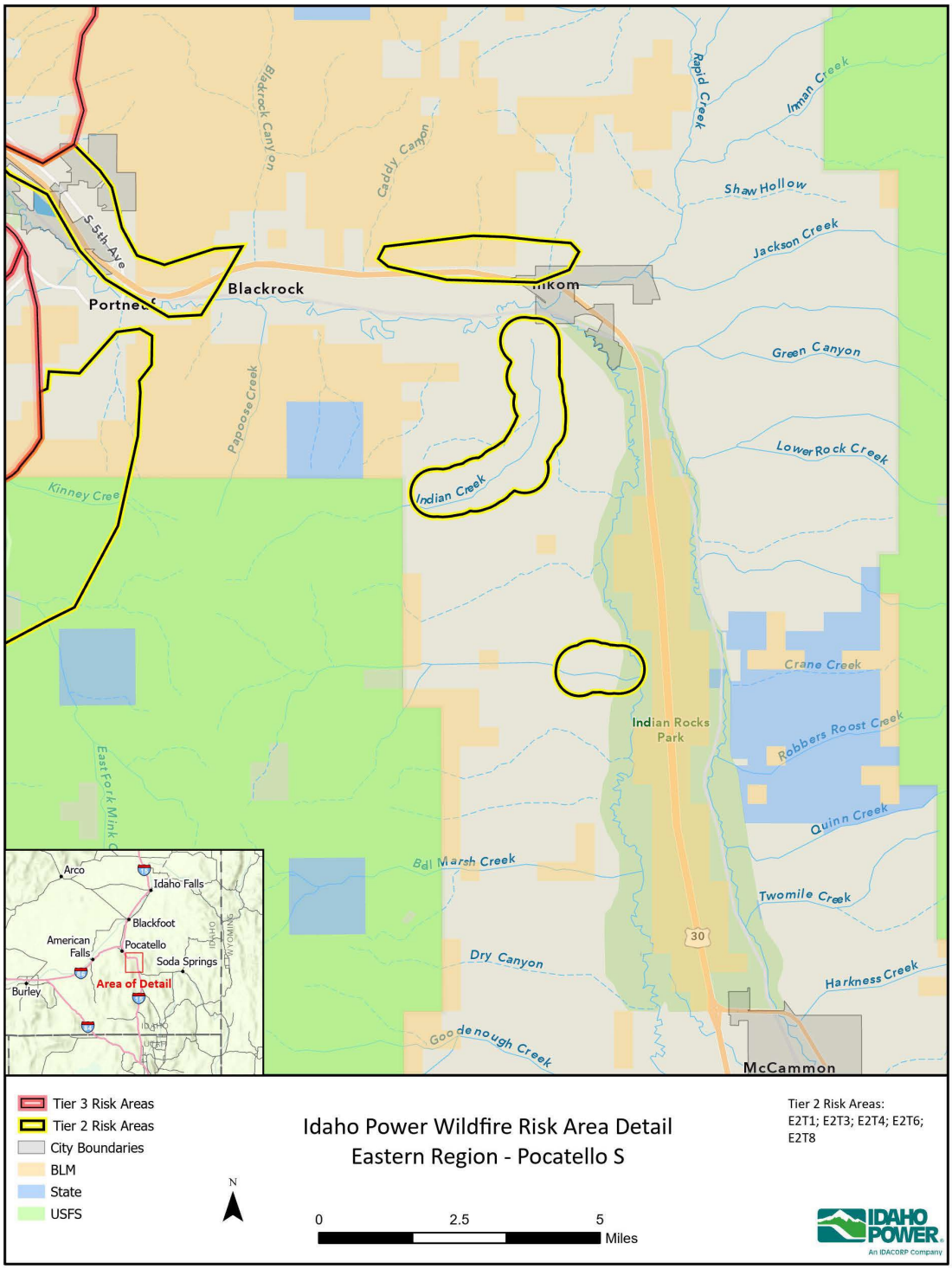

Figure 8
Eastern Region–Pocatello south

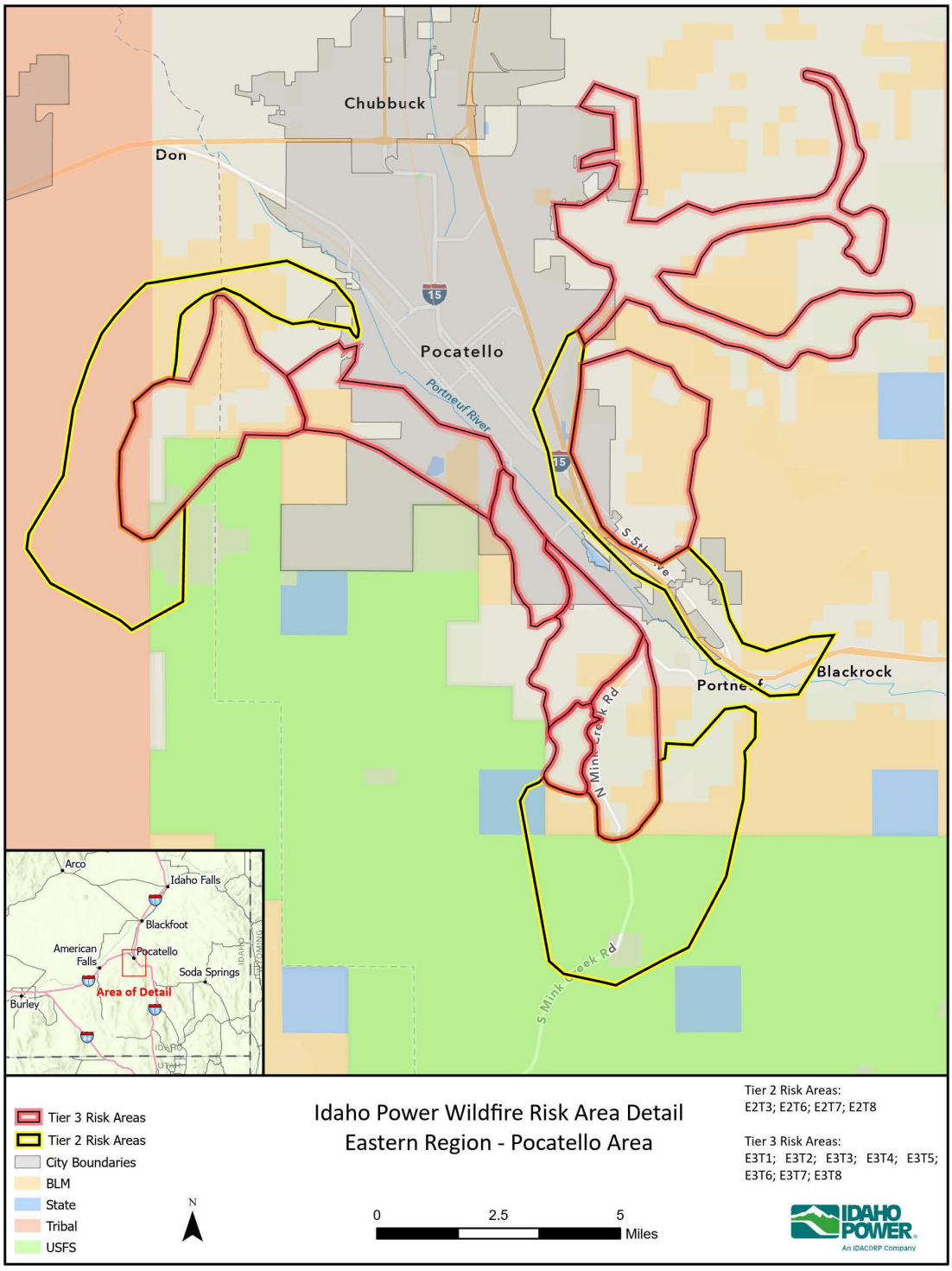

Figure 9
Eastern Region–Pocatello area

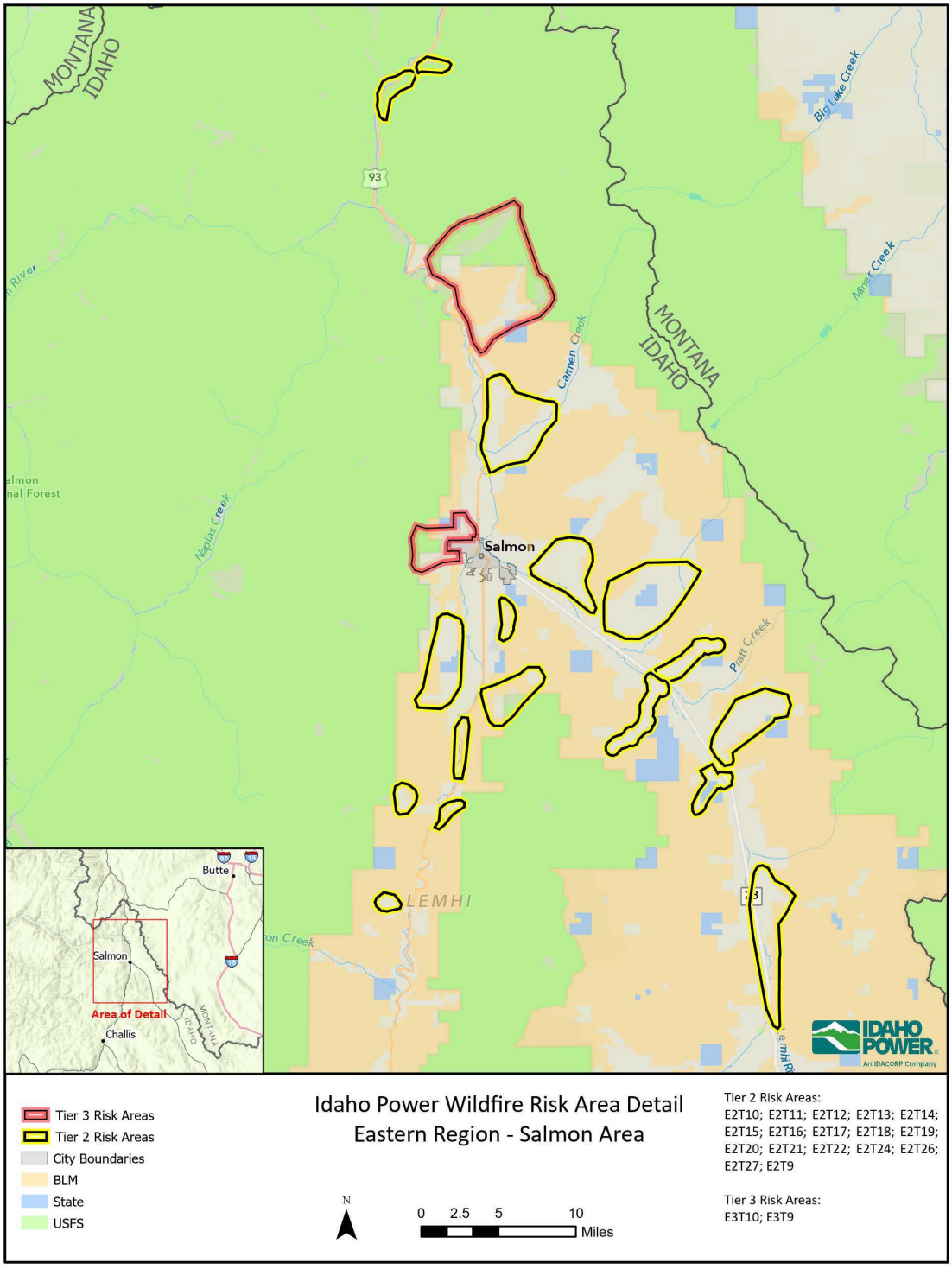

Figure 10
Eastern Region–Salmon area

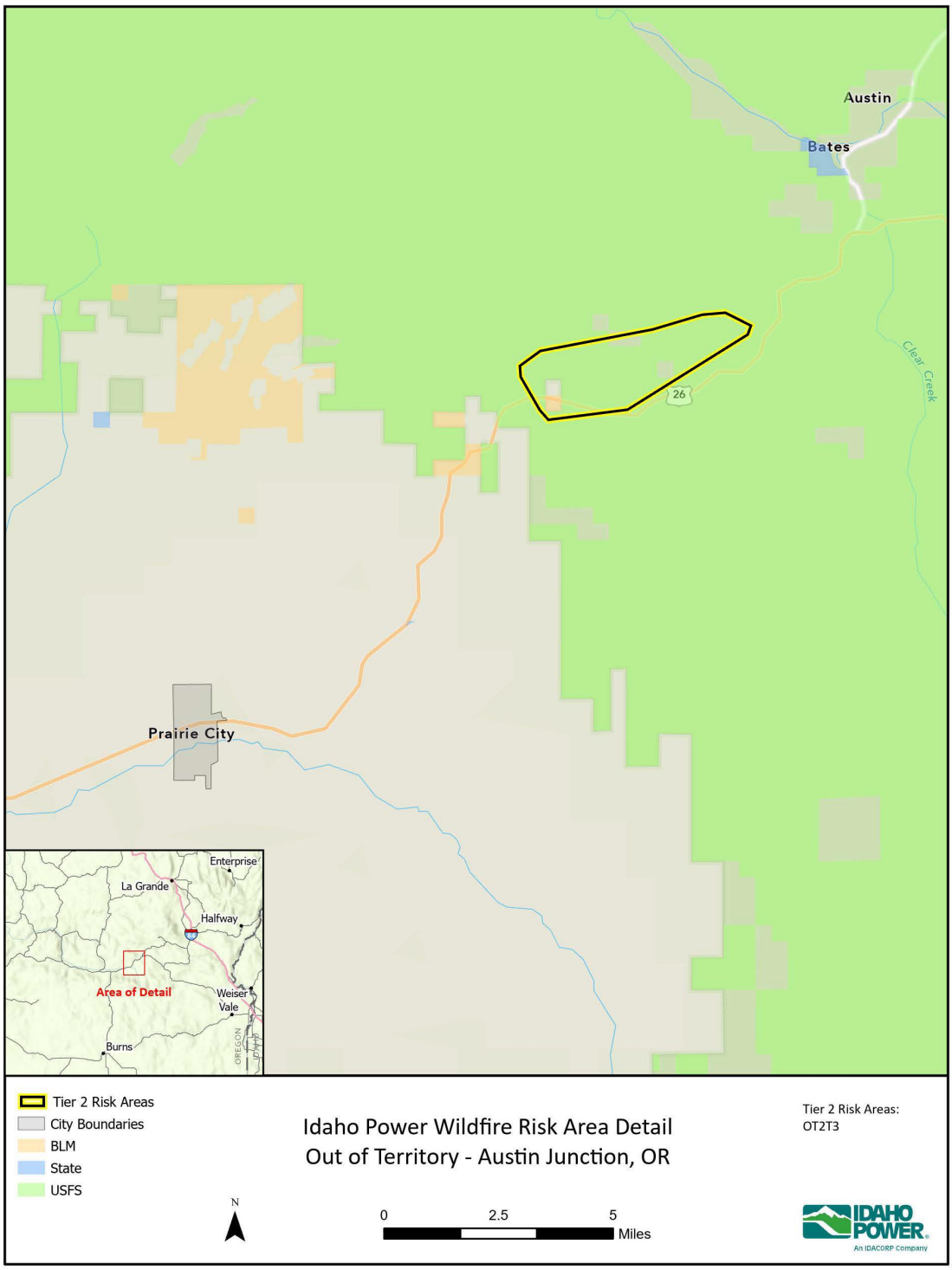

Figure 11
Out of territory—Austin Junction, Oregon

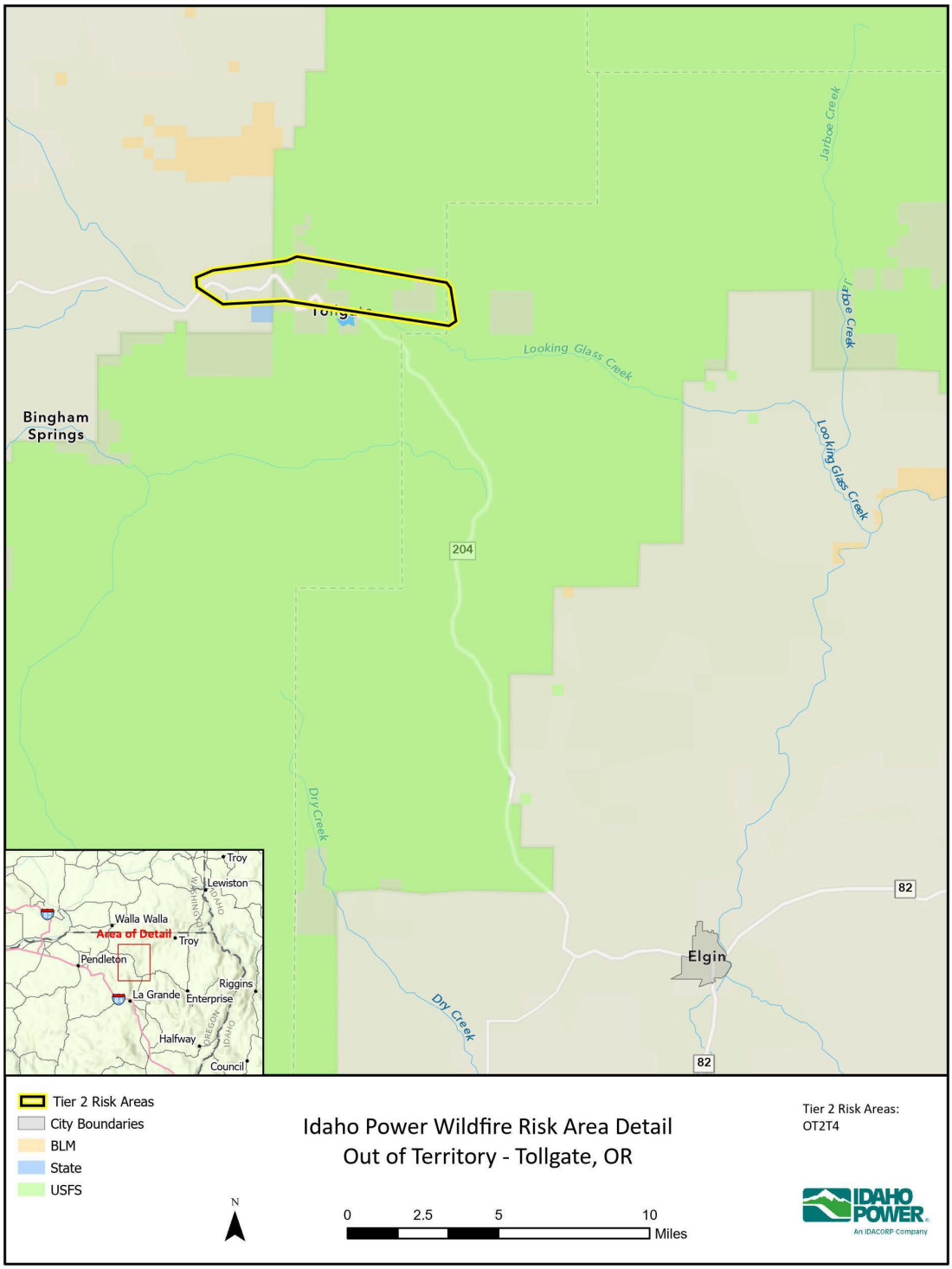

Figure 12
Out of territory—Tollgate, Oregon

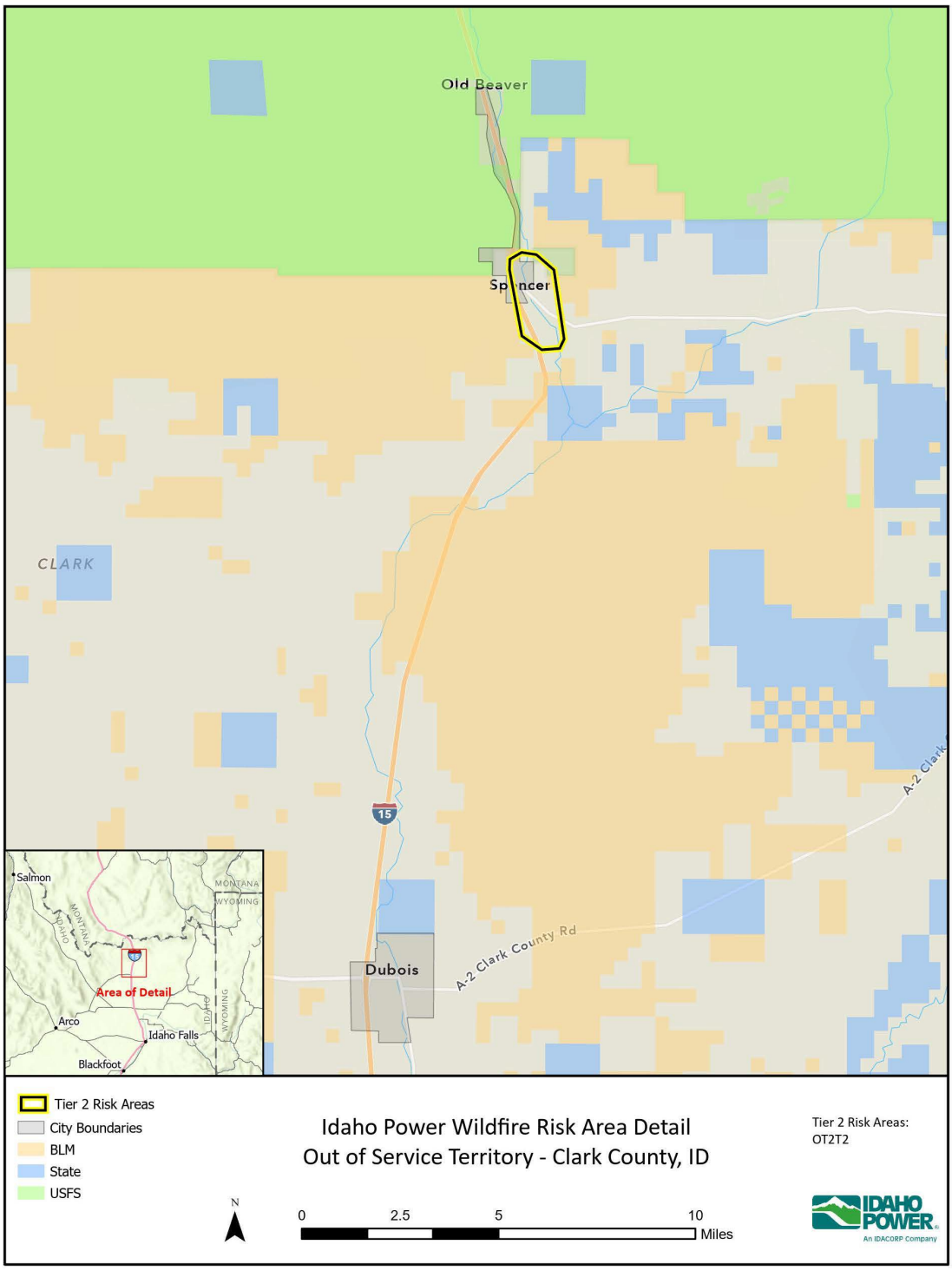

Figure 13
Out of territory—Clark County, Idaho

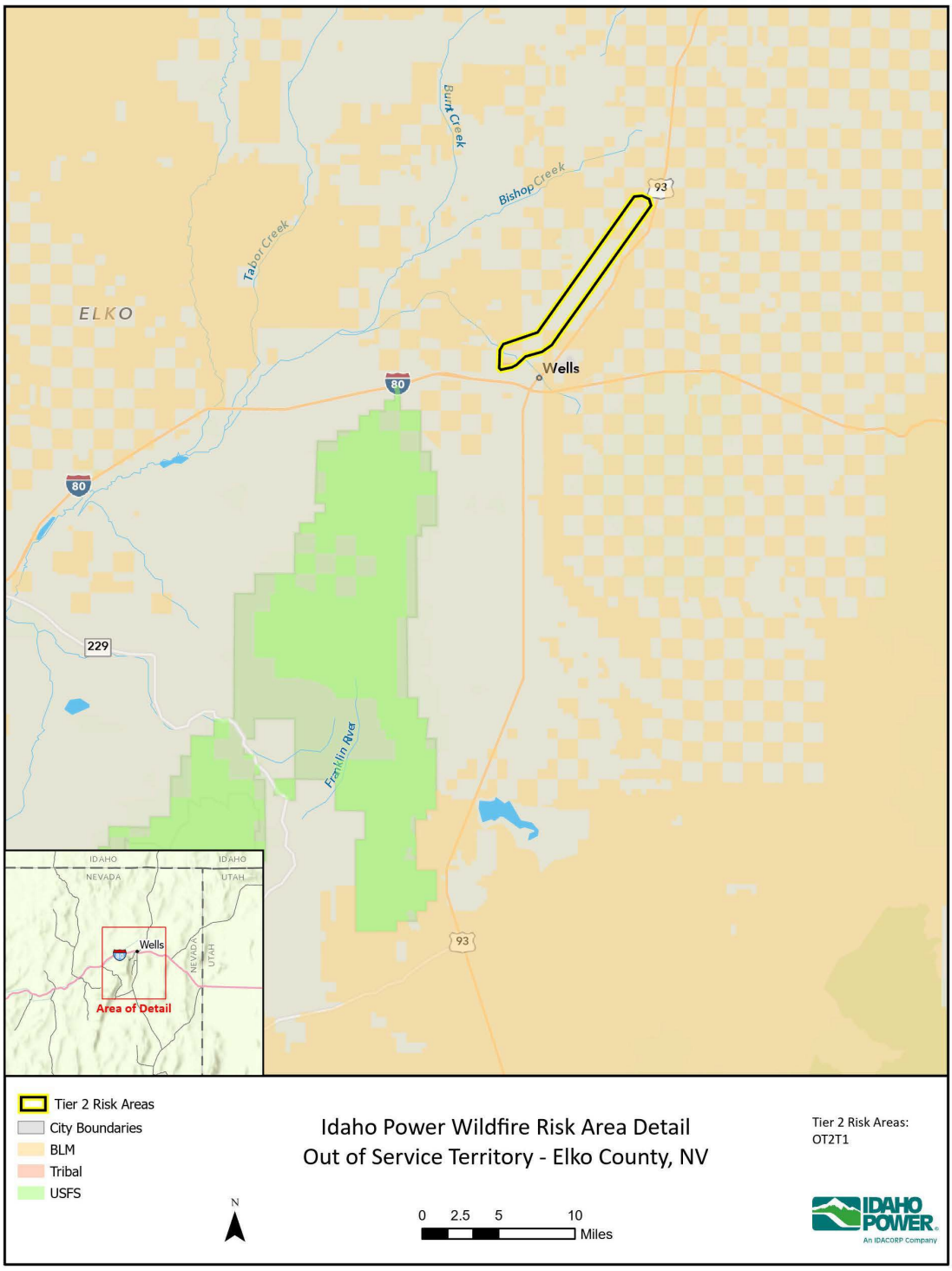

Figure 14
Out of territory—Elko County, Nevada

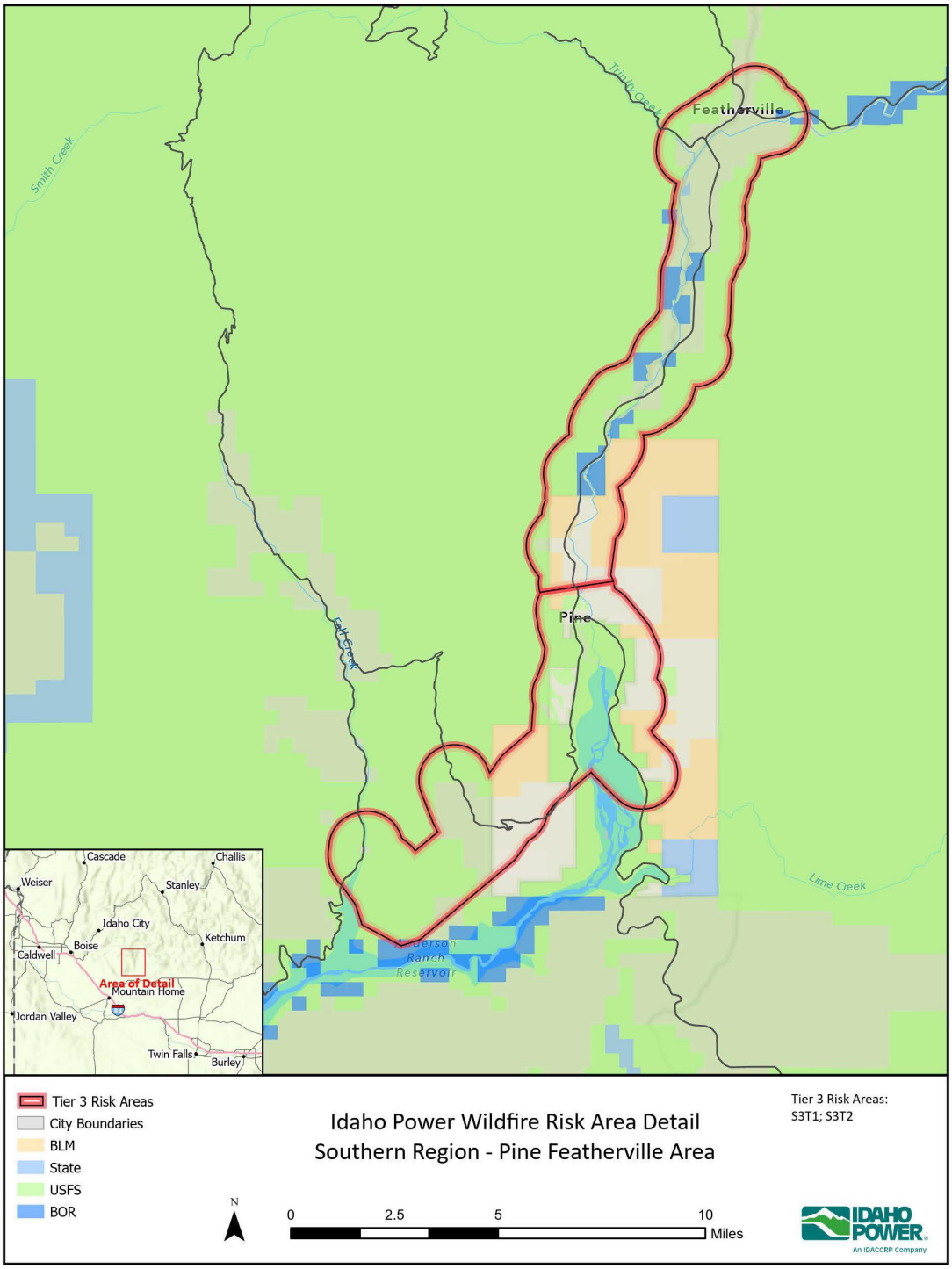

Figure 15
Southern Region—Pine/Featherville area

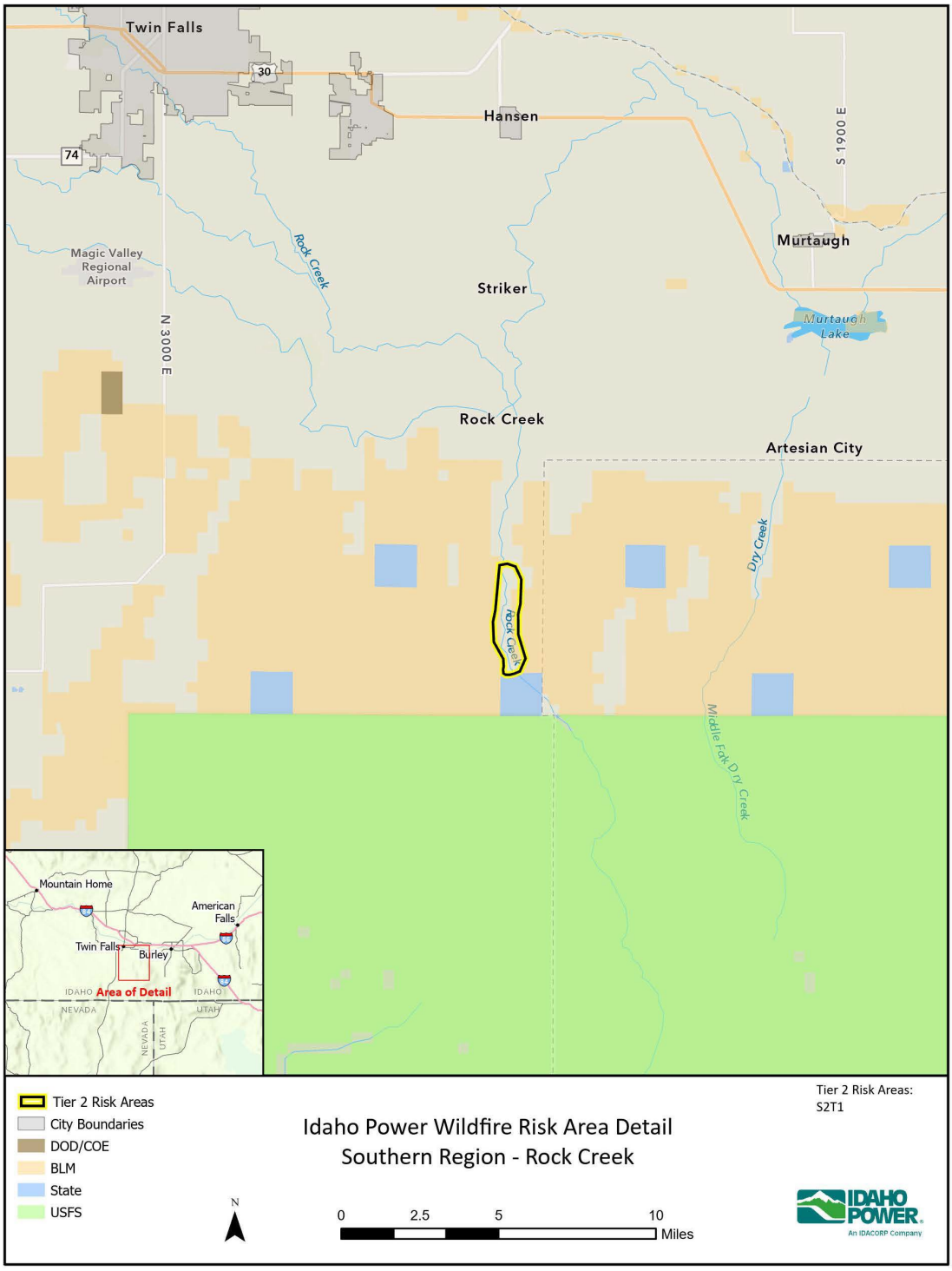

Figure 16
Southern Region—Rock Creek, Twin Falls south

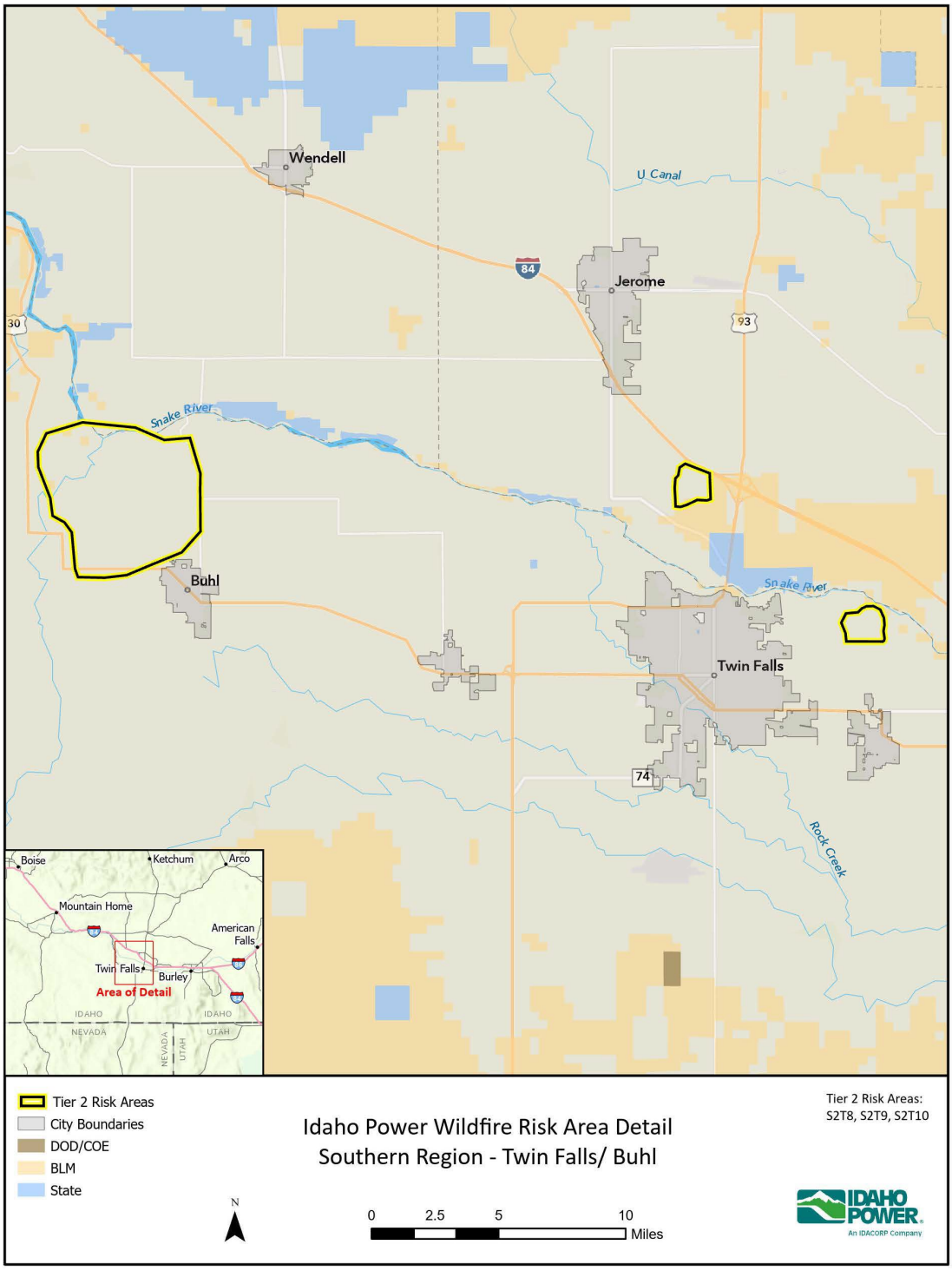

Figure 17
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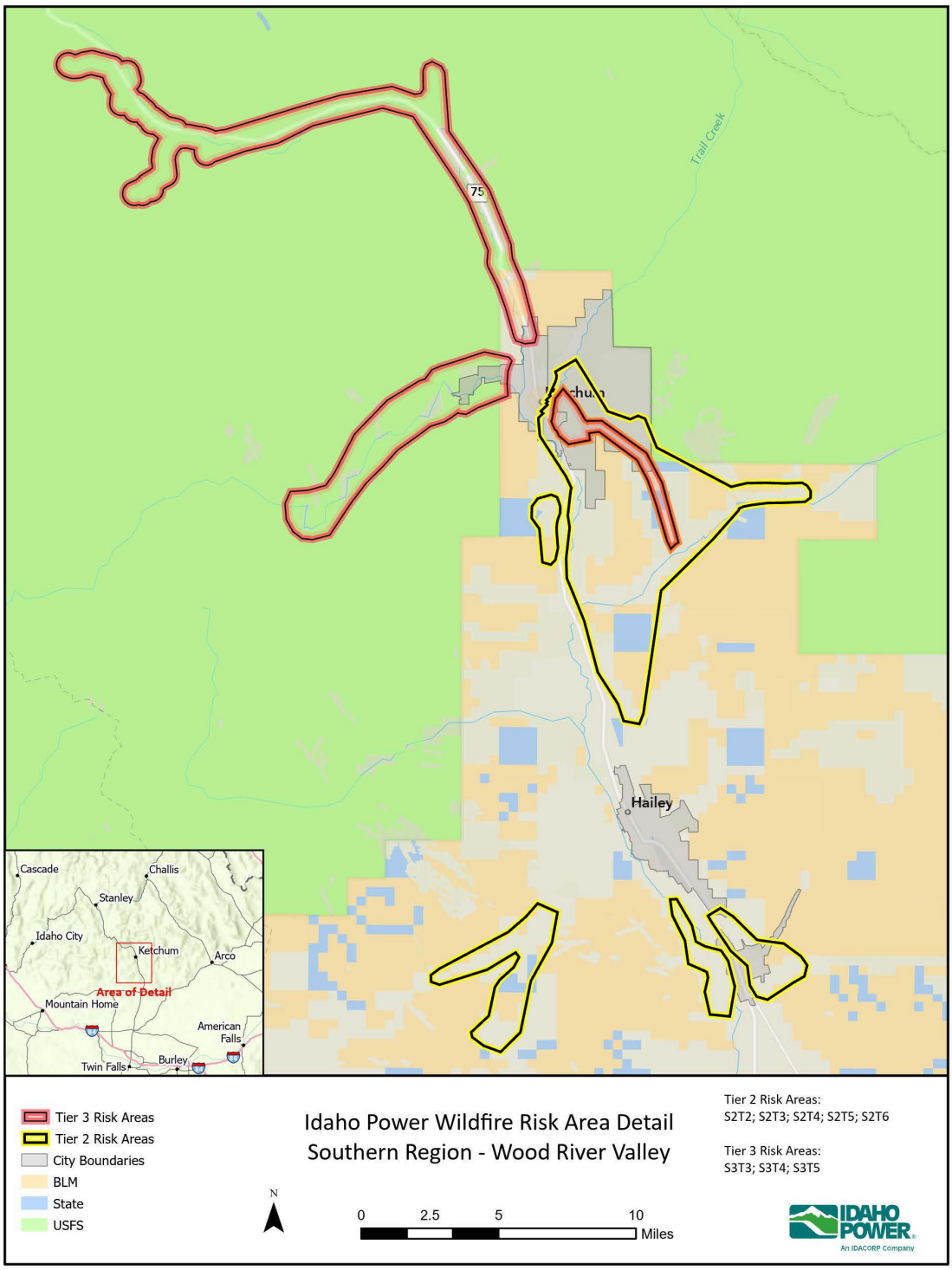

Figure 18
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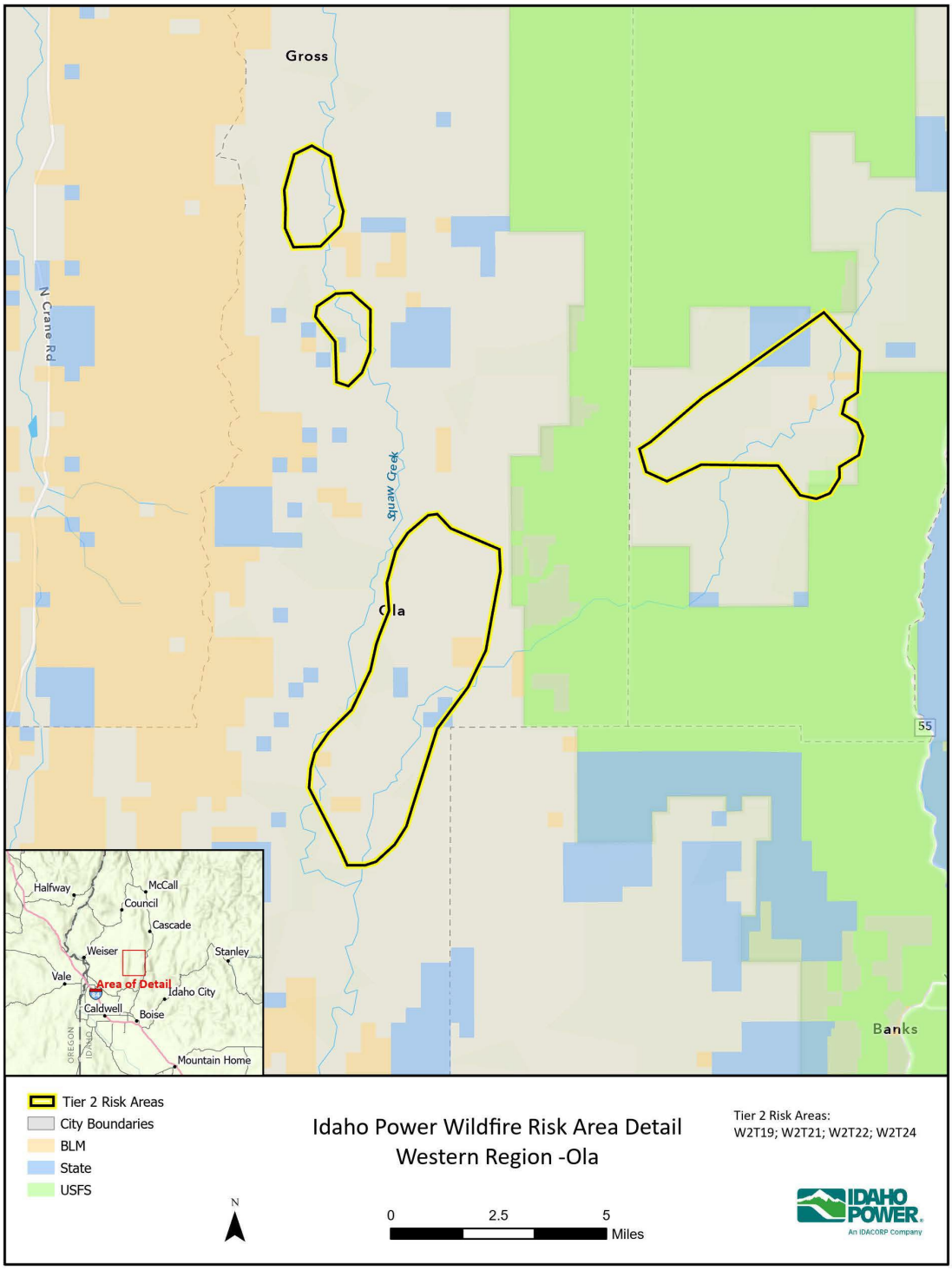


Figure 19
Western Region—Ola

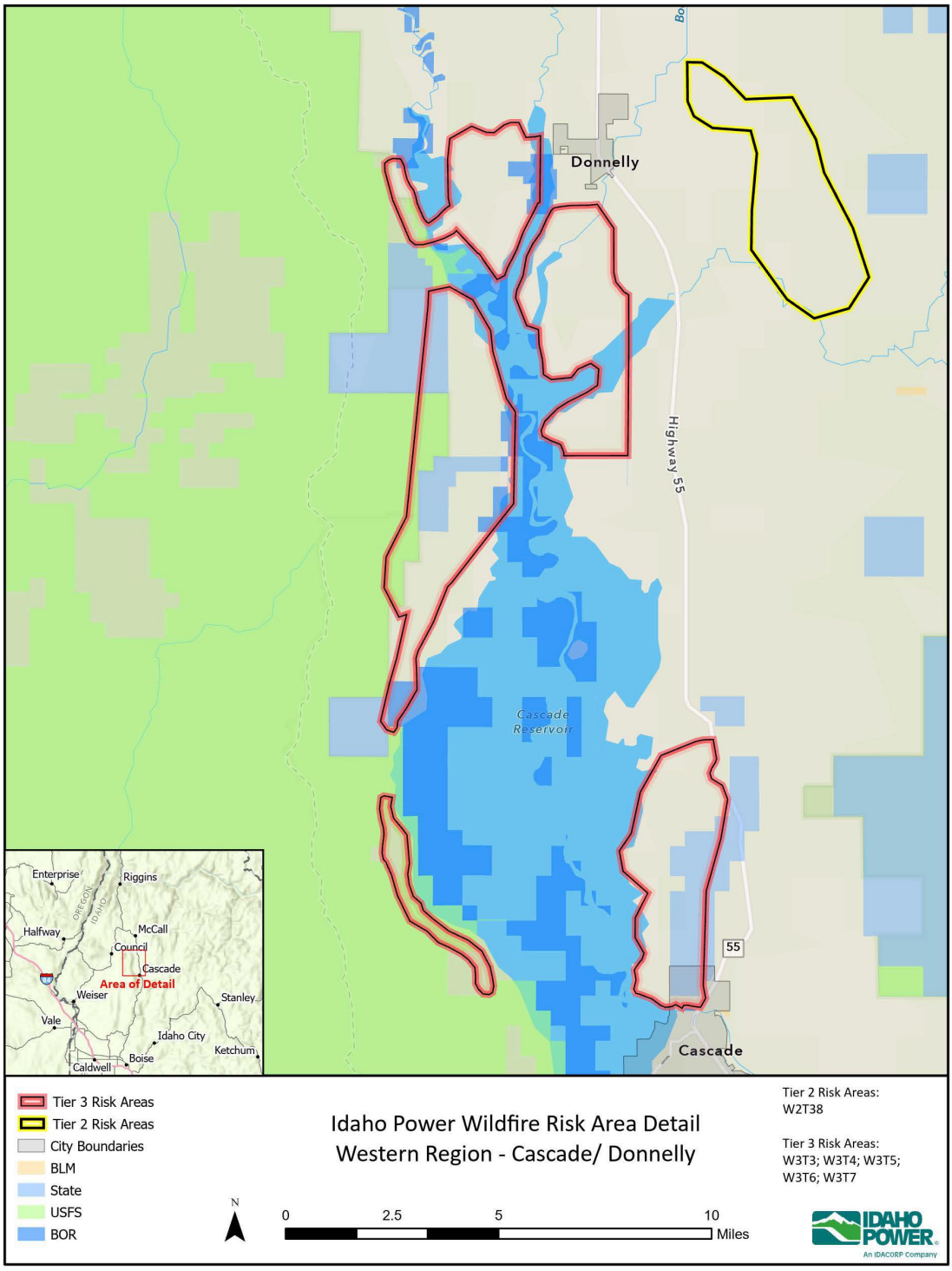
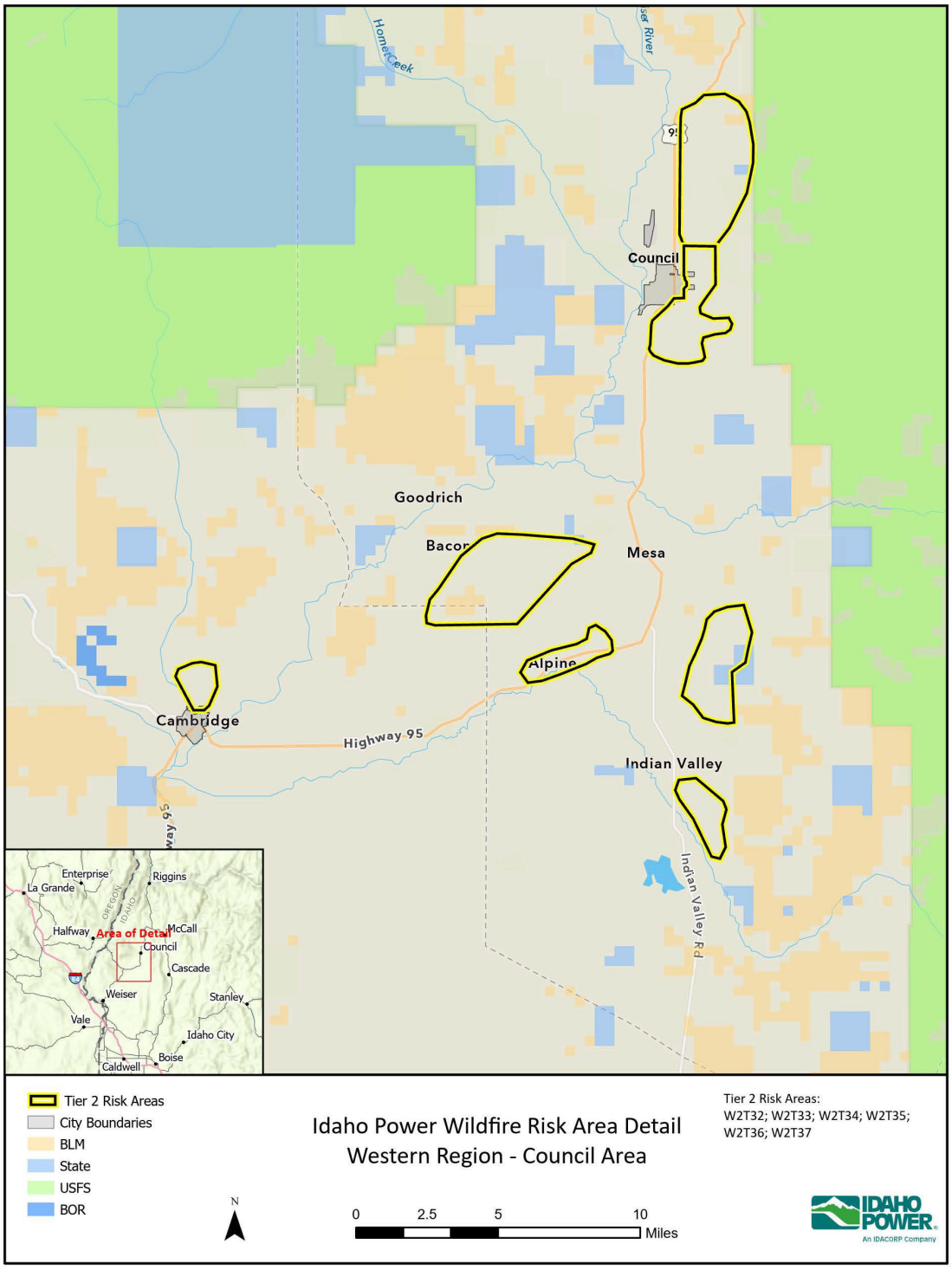


Figure 20
Western Region—Cascade/Donnelly



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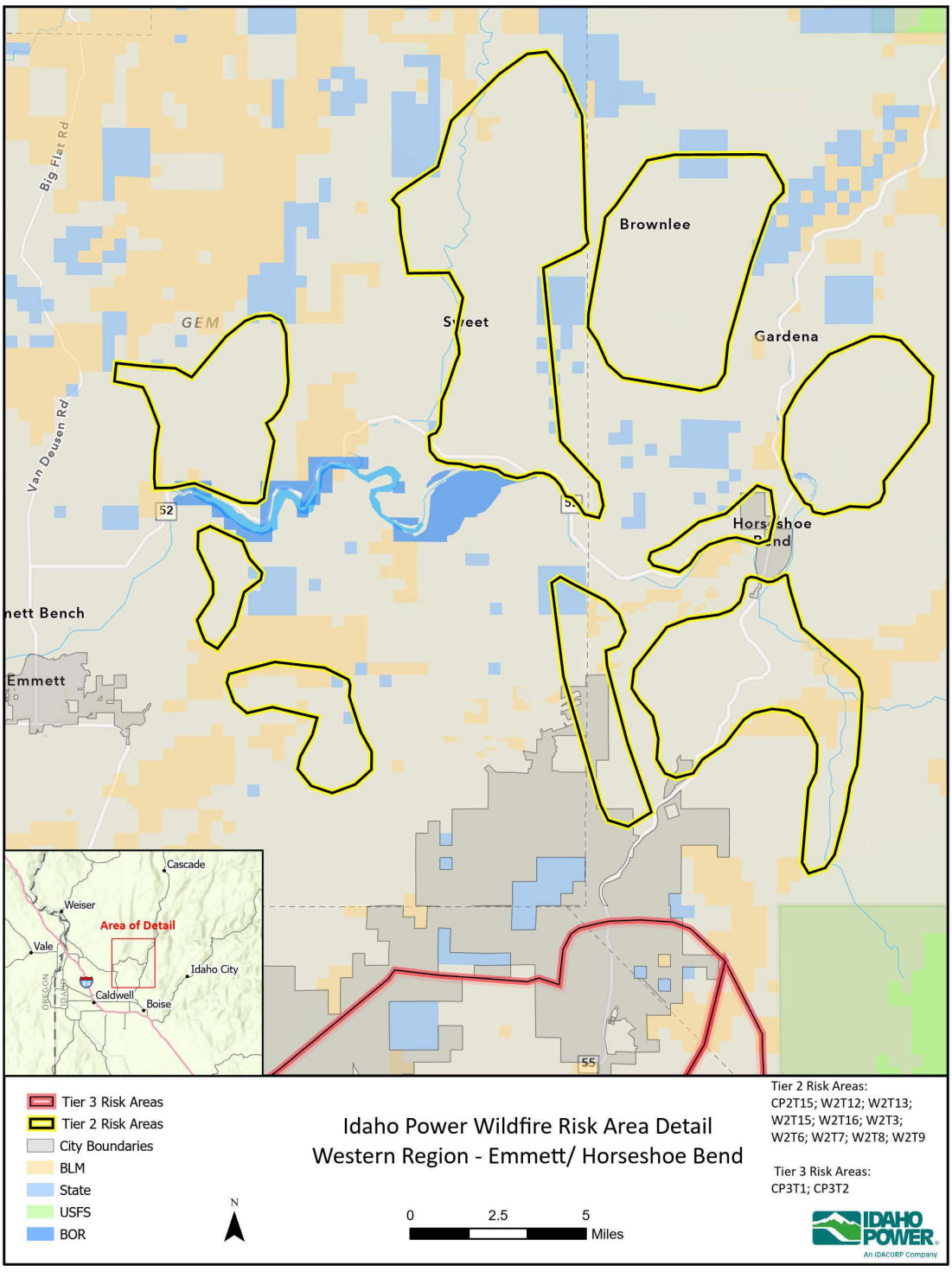
Western Region—Council area



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Western Region—Emmett/Horseshoe Bend

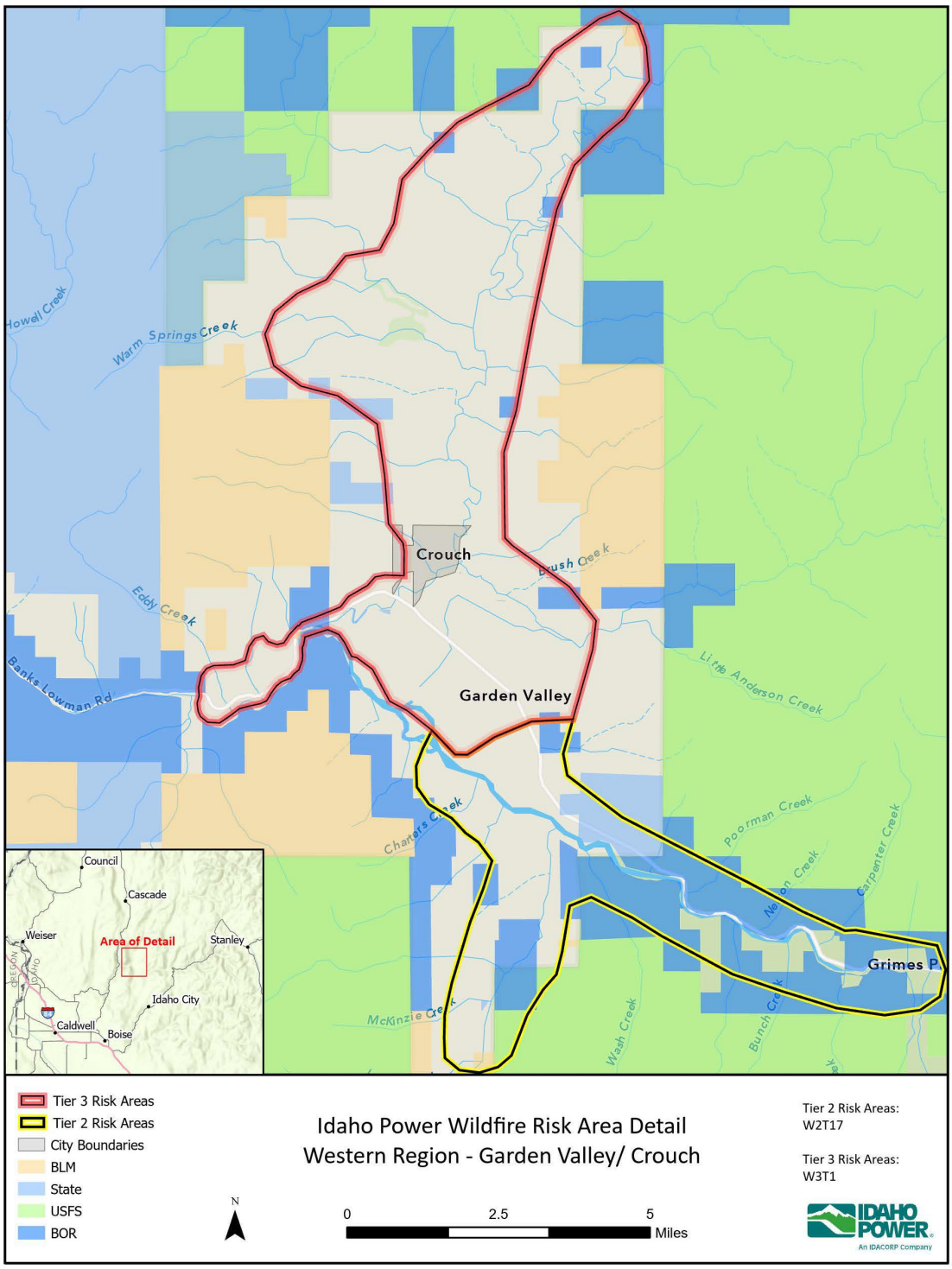


Figure 23
Western Region—Garden Valley/Crouch

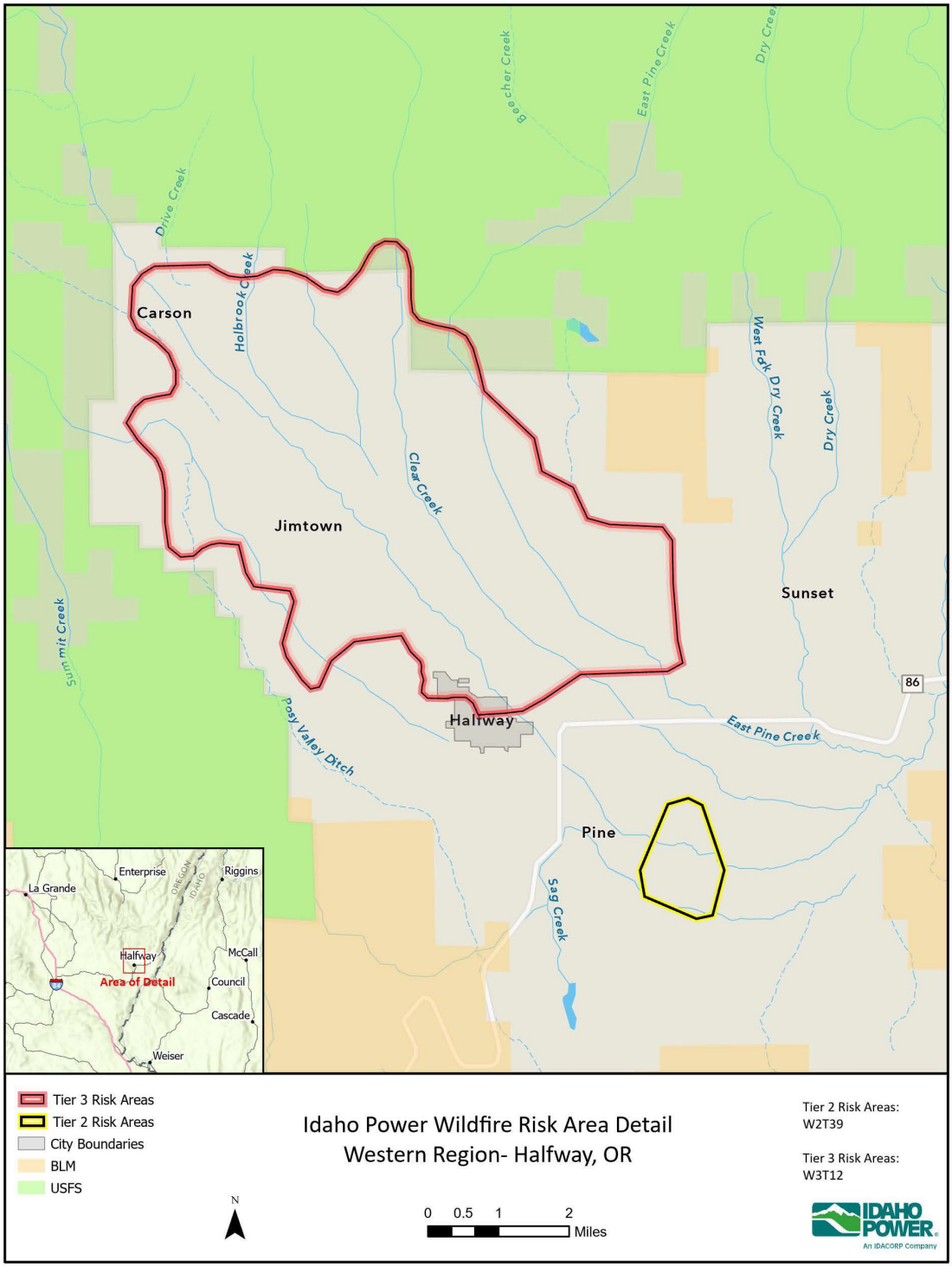
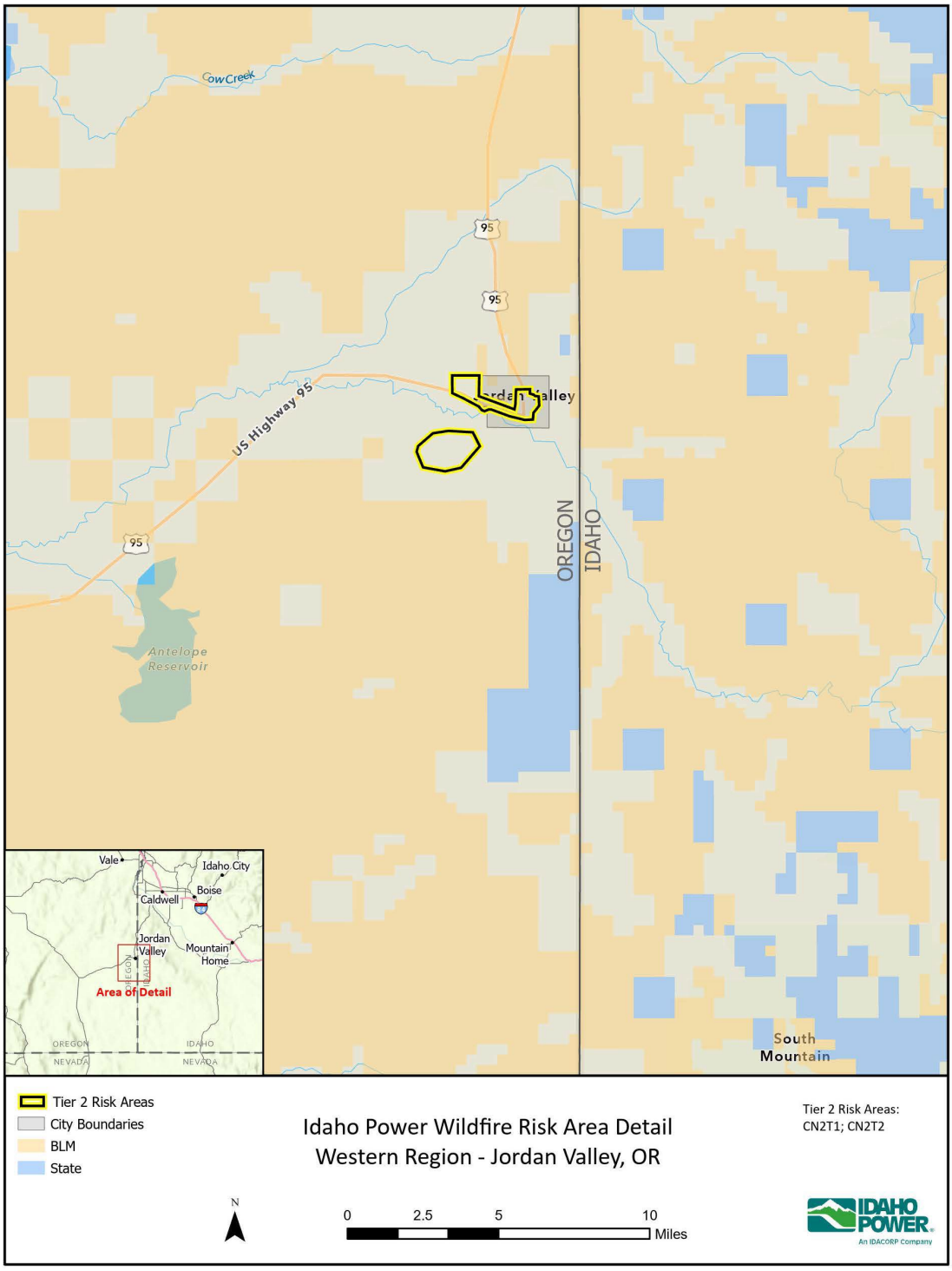


Figure 24
Western Region—Halfway, Oregon



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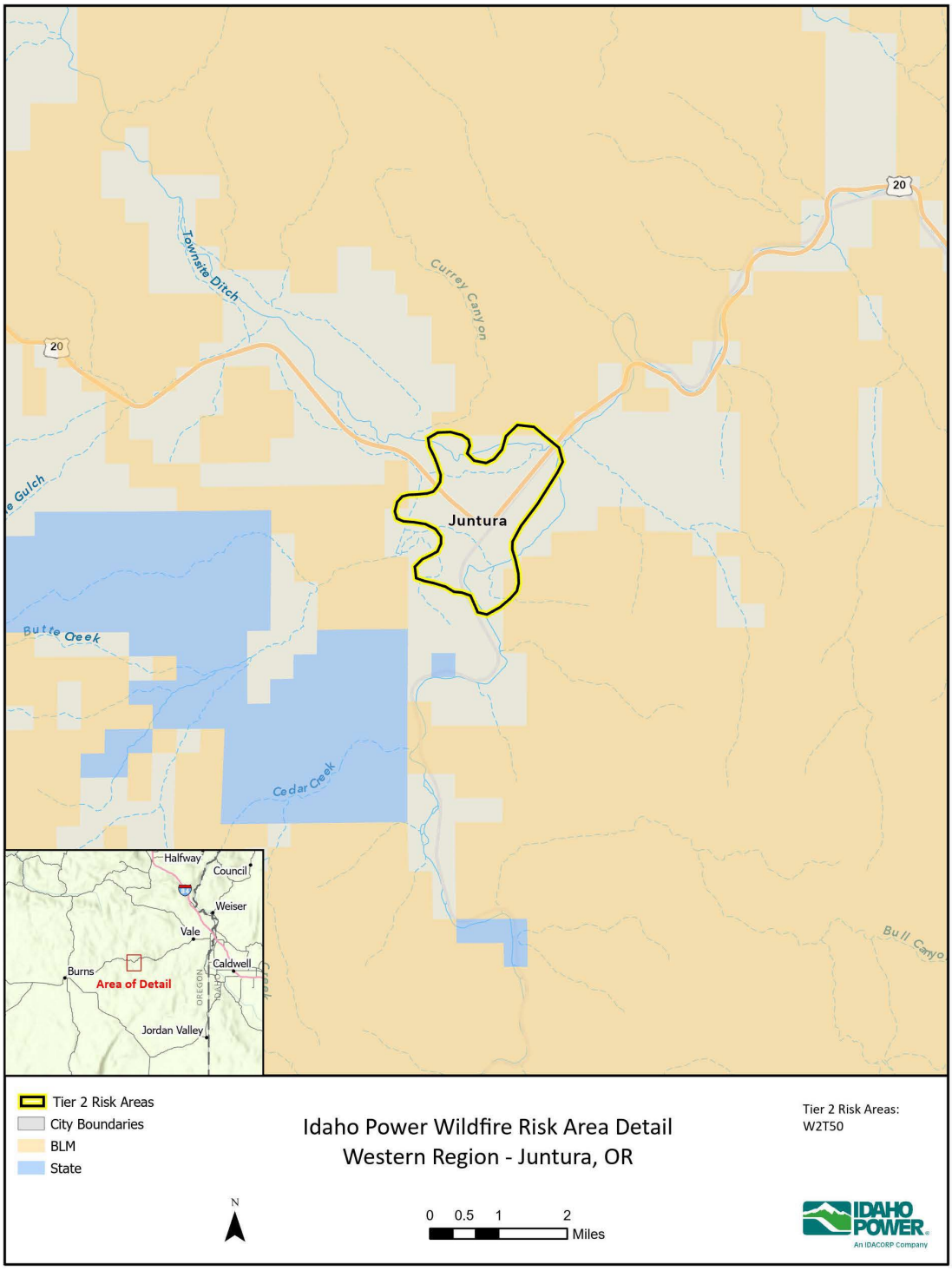

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Western Region—Juntura, Oregon

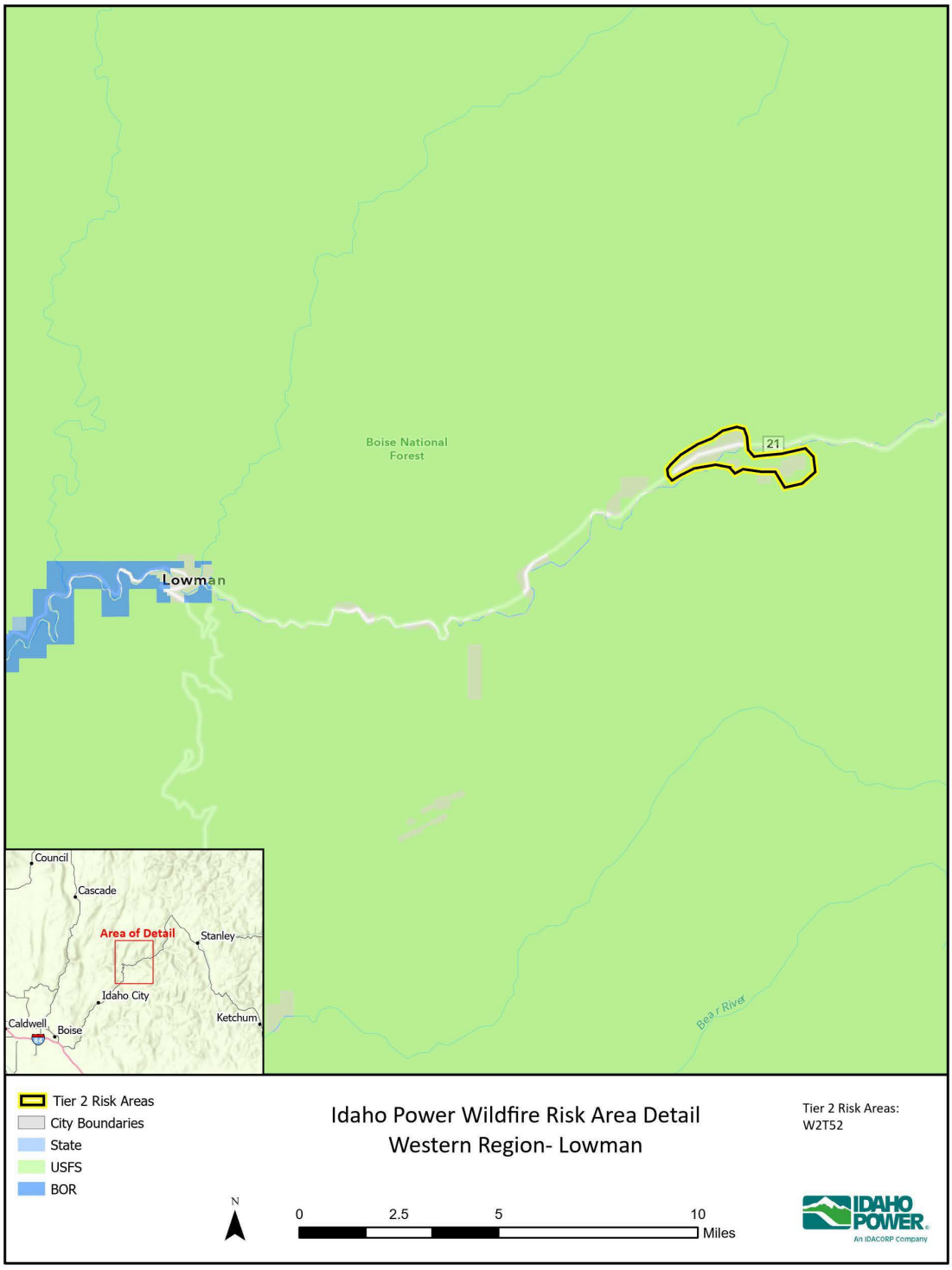
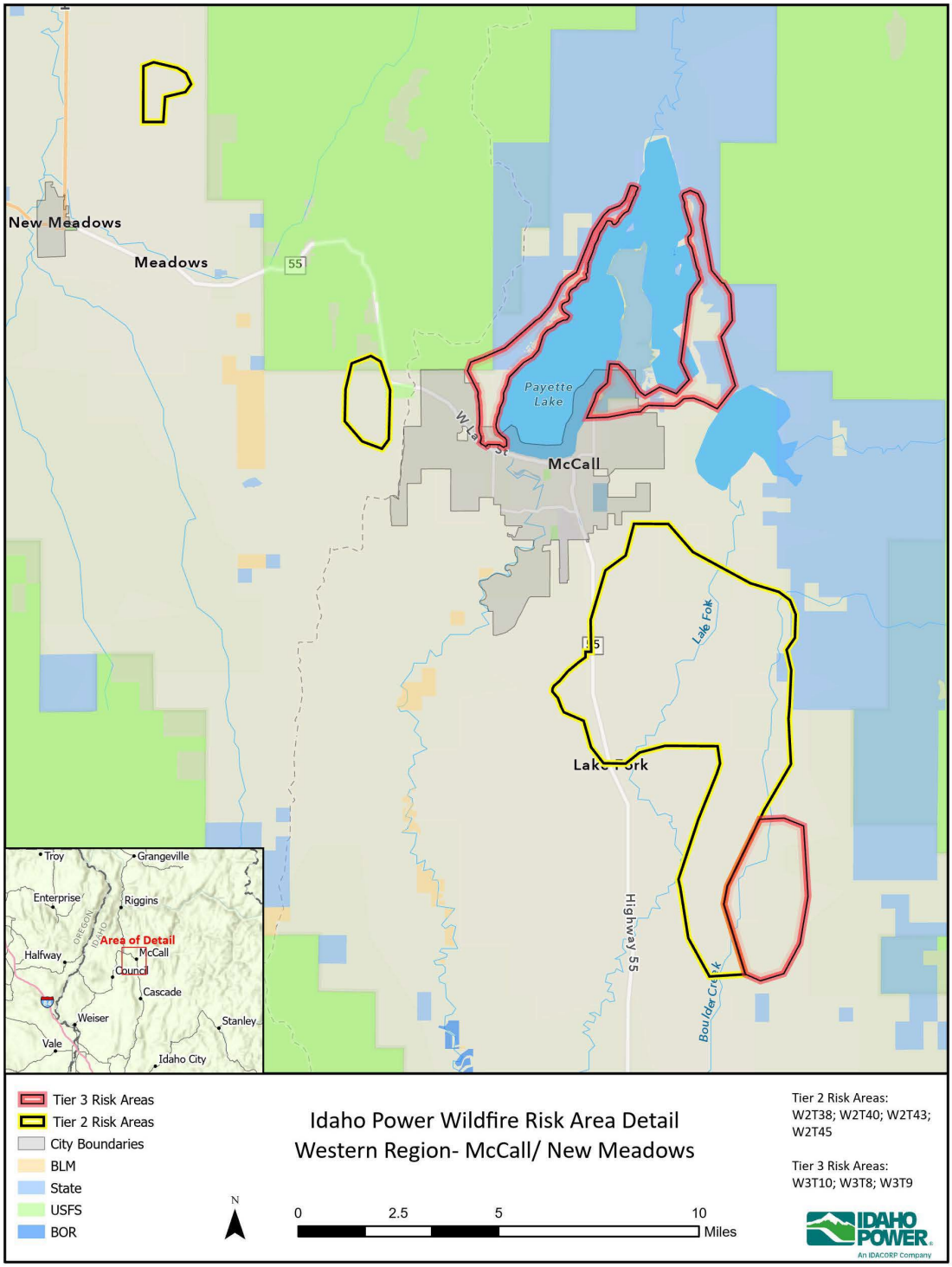


Figure 27
Western Region—Lowman



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Western Region—McCall/New Meadows

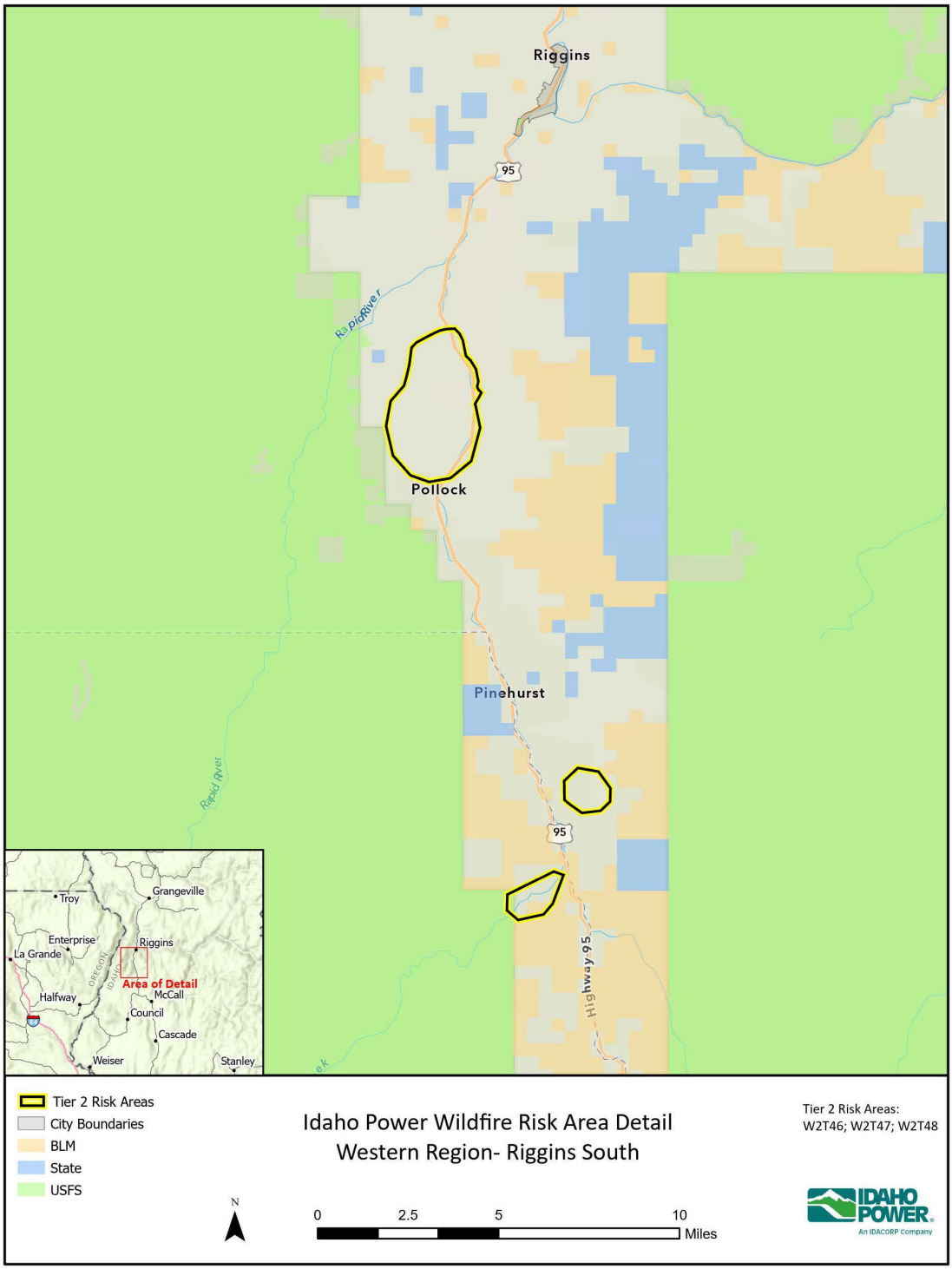
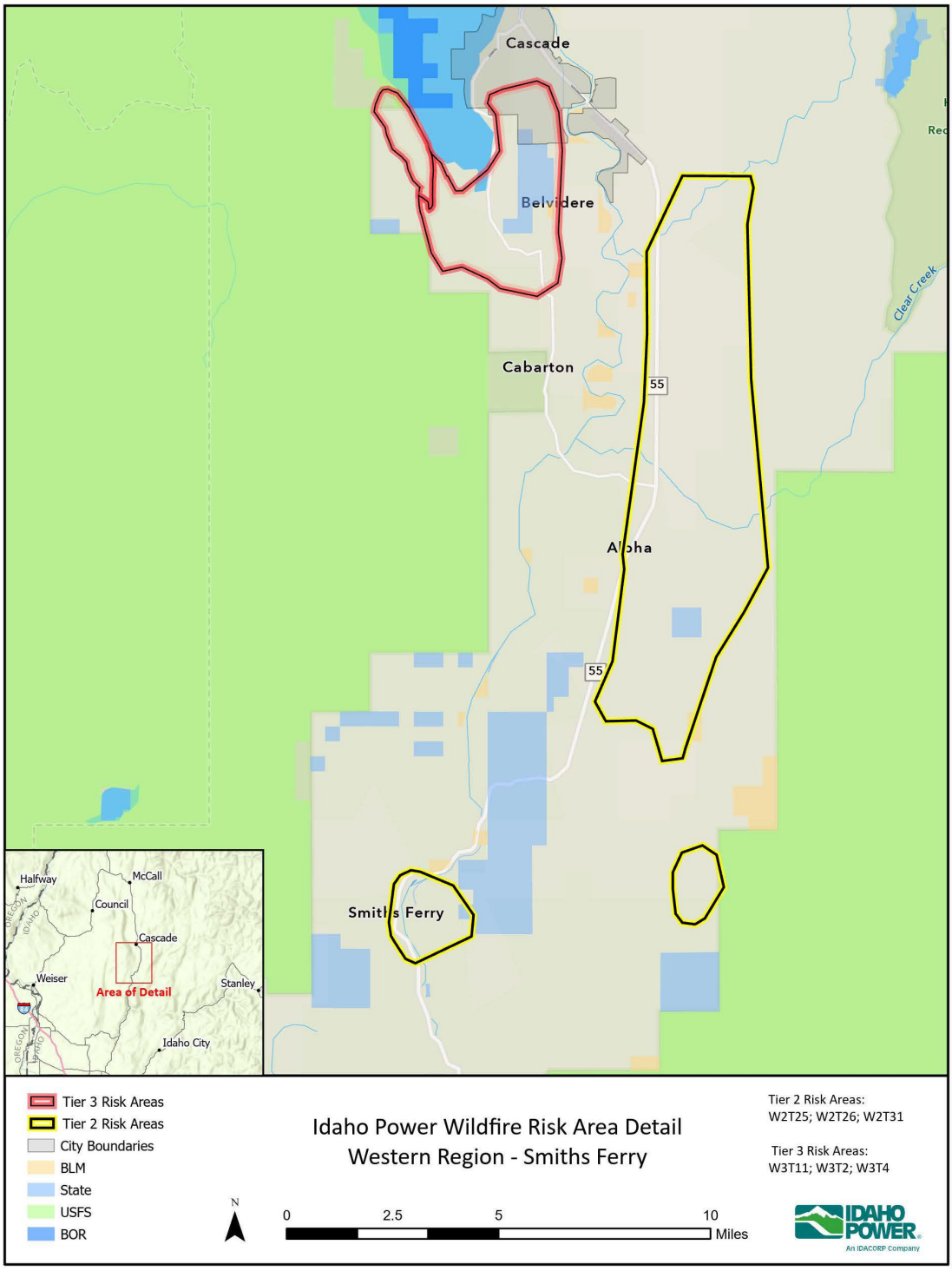


Figure 29
Western Region—Riggins south



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Western Region—Smiths Ferry

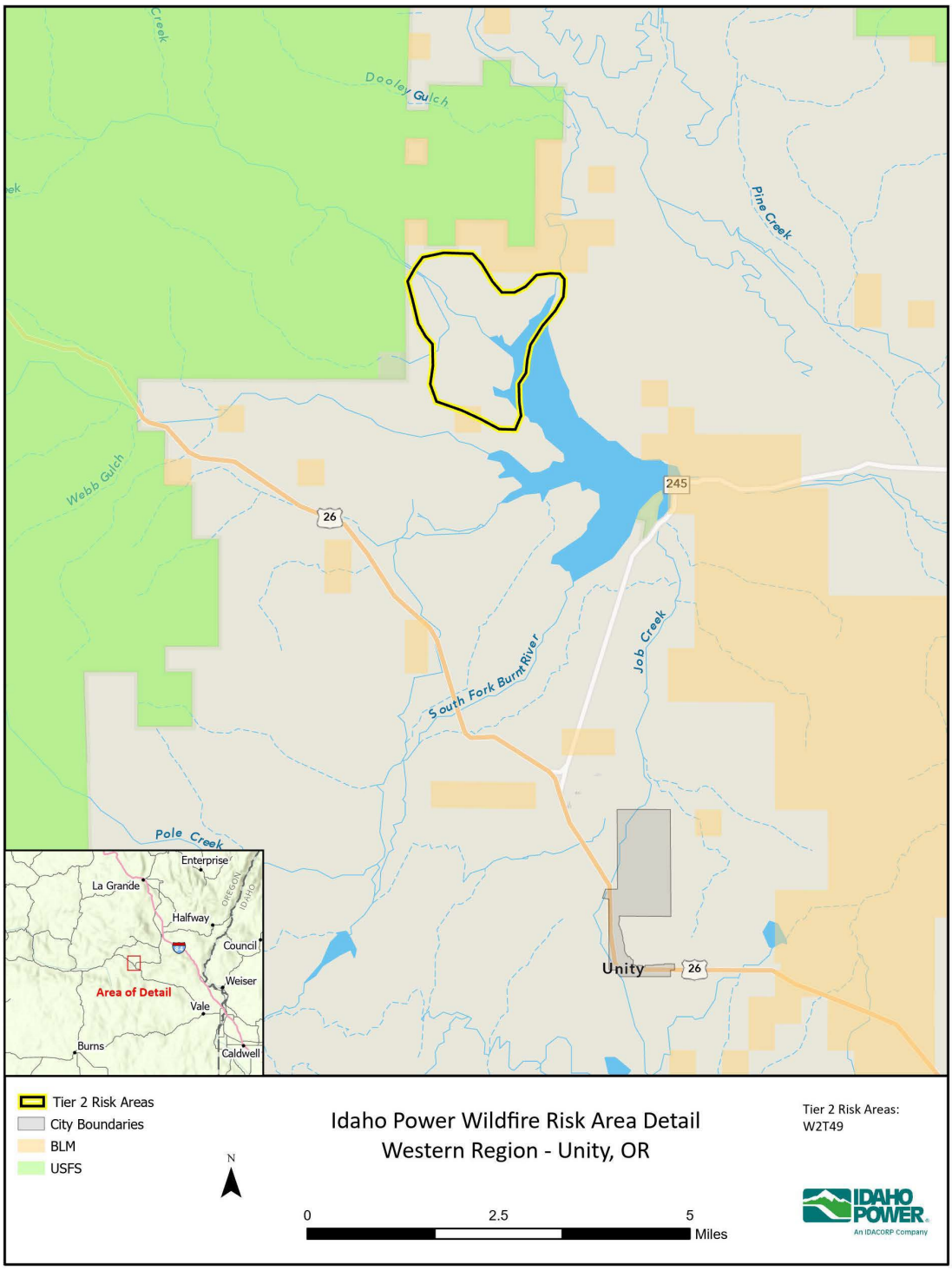
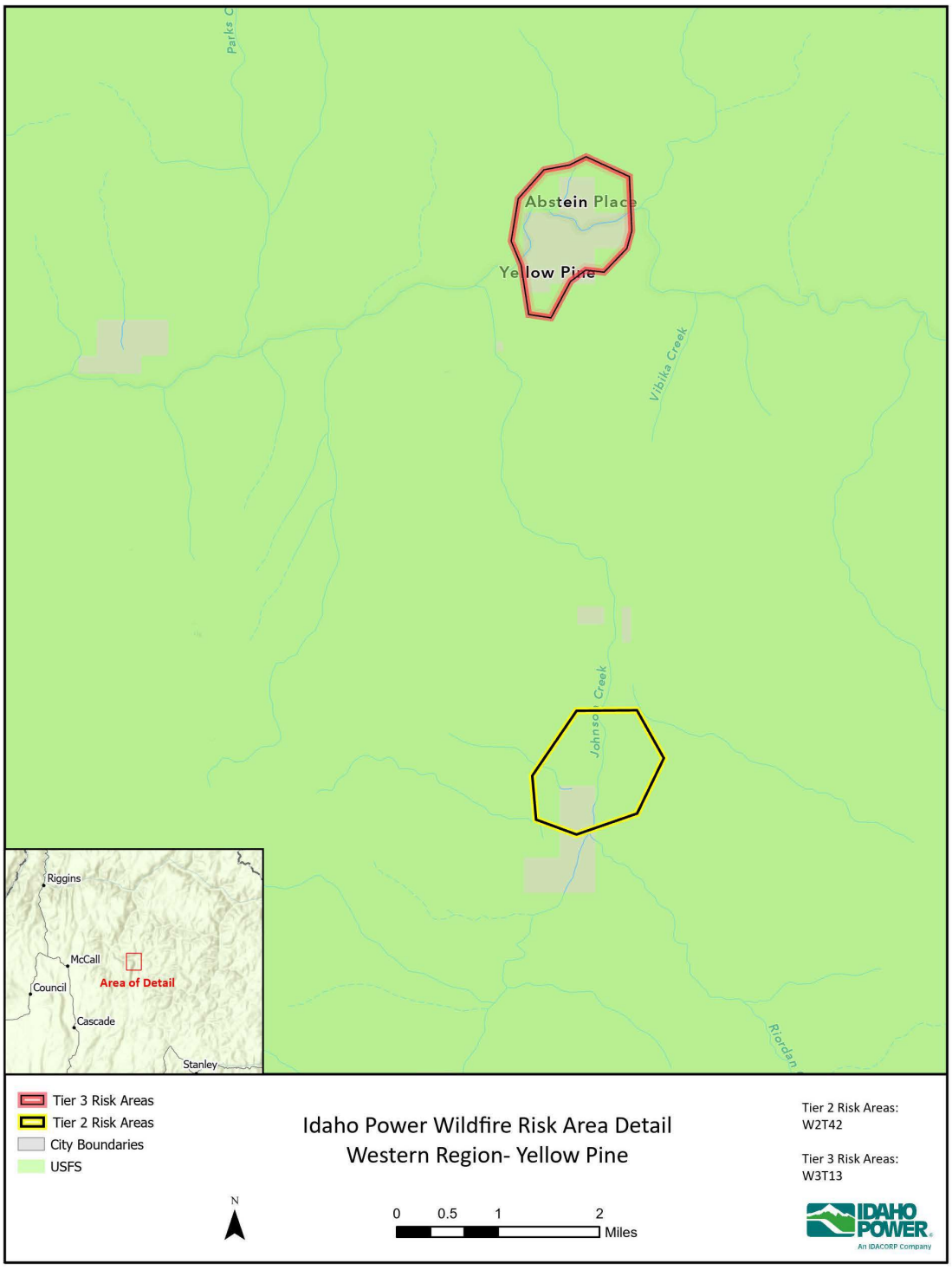


Figure 31
Western Region—Unity, Oregon



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Western Region—Yellow Pine

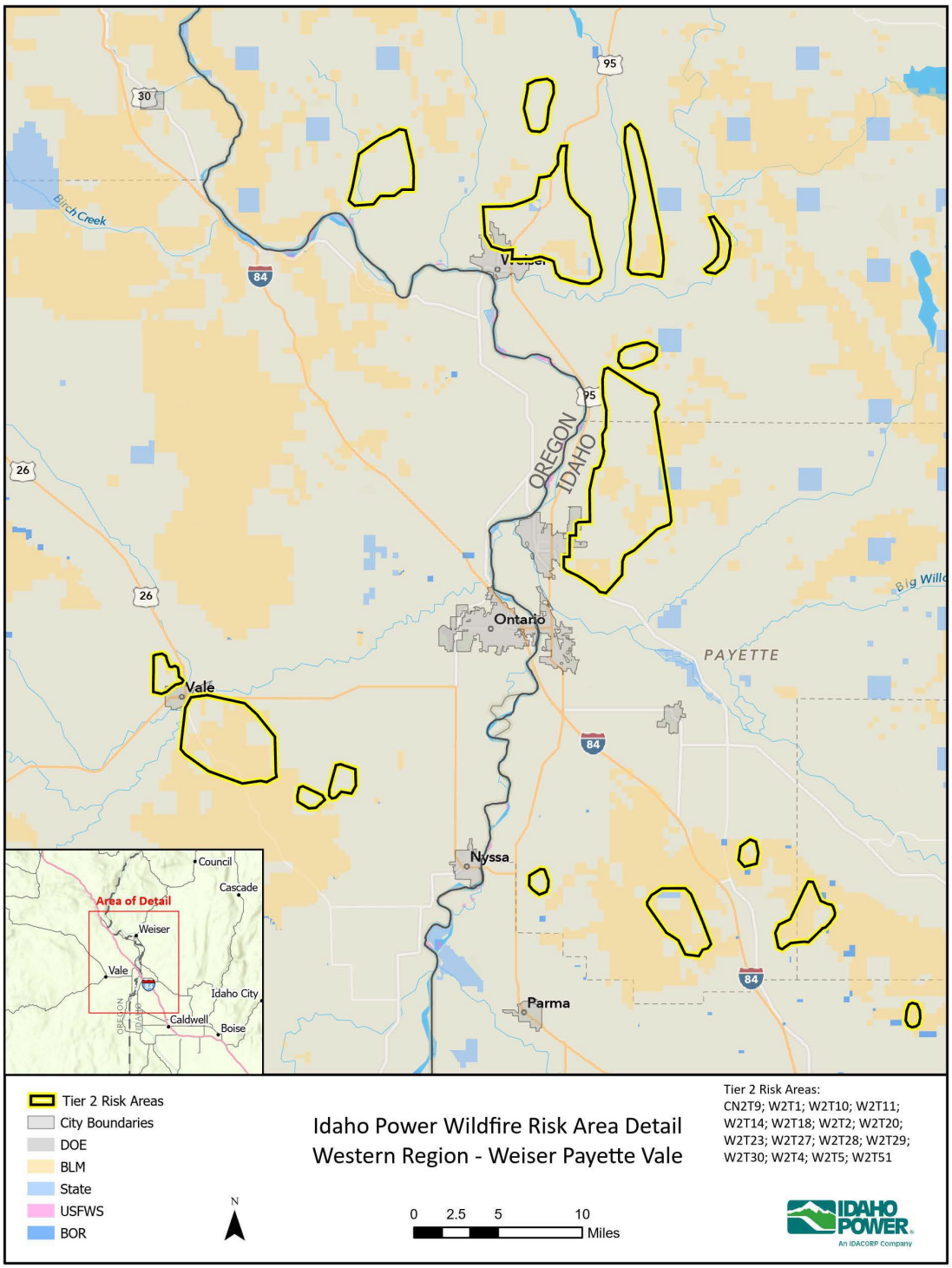

Figure 33
Western Region—Weiser, Payette, Vale Tier 2 zones

Appendix D
Oregon wildfire requirements and recommendations

Oregon Requirements and Recommendations

Oregon Requirements and Recommendations

This appendix provides additional information specific to wildfire-related requirements, as well as wildfire-related recommendations, in Oregon.

Oregon Administrative Rule (OAR) Regulatory Compliance Index

Below is a mapping of Wildfire Mitigation Plan rules to sections within Idaho Power's WMP.

Wildfire Protection Plan Filing Requirements—OAR 860-300-0020

Oregon Requirement—OAR 860-300-0020	Corresponding Location in WMP
(1) Wildfire Mitigation Plans and Updates must, at a minimum, contain the following requirements as set forth in Section 3(2)(a)-(h), chapter 592, Oregon Laws 2021 and as supplemented below: *(a) Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:*	See Section 3: Quantifying Wildland Fire Risk See Idaho Power website and Appendix C for details of wildfire risk zones outside of service area
(A) Within the service territory of the Public Utility, and	See Section 3.3: Wildfire Risk Zones
(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.	See Section 3.3.2 and Figure 17: Boardman to Hemingway (B2H) Proposed Route Risk Zones
(b) Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.	See Section 4.2: Risk-Based Cost and Benefit of Wildfire Mitigation
(c) Identified preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.	See Section 5: Situational Awareness; Section 6: Mitigation—Field Personnel Practices; Section 7: Mitigation—Operations; Section 8: Asset Management and Inspection Initiatives; and Section 8.7: Vegetation Management
(d) Discussion of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure.	See Section 10.1: Objective and Section 10.2: Community Engagement See Appendix B: Idaho Power's Public Safety Power Shutoff Plan, 10.1: Community Engagement and Section 10.4: Customer Communications
(e) Identified protocol for the de-energization of power lines and adjusting of power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-0040 through 860-300-0050.	See Section 7.5: Public Safety Power Shutoff and Appendix B: Idaho Power's Public Safety Power Shutoff Plan
(f) Identification of the community outreach and public awareness efforts that the Public Utility will use before, during and after a wildfire season, consistent with OAR 860-300-0040 and OAR 860-300-0050.	See Section 10: Communicating About Wildfire

Oregon Requirement—OAR 860-300-0020	Corresponding Location in WMP
(g) Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	For Transmission, see Section 8.4: Transmission Asset Management and Inspection Initiatives (with information on aerial, ground, detailed visual, pole, and other protection programs) For Distribution, see Section 8.5: Distribution Asset Management and Inspection Initiatives (with information on visual, pole, and line equipment inspection programs)
(h) Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	See Section 8.7.4 Transmission Vegetation Management and Section 8.7.5: Distribution Vegetation Management
(i) Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.	See Section 4: Mitigation Approach
(j) Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Laws 2021, as well as research and analysis the Public Utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used to develop and implement cost effective wildfire mitigation solutions.	See Section 2: Government, Industry, and Peer Utility Engagement
(k) Description of ignition inspection program, as described in Division 24 of these rules, including how the utility will determine, and instruct its inspectors to determine, conditions that could pose an ignition risk on its own equipment and on pole attachments.	See Section 8: Asset Management and Inspection Initiatives and Section 8.6: Ignition Tracking and Analysis

Risk Analysis—OAR 860-300-0030

Oregon Requirement—OAR 860-300-0030	Corresponding Location in WMP
(1) The Public Utility must include in its Wildfire Mitigation Plan risk analysis that describes wildfire risk within the Public Utility's service territory and outside the service territory of the Public Utility but within the Public Utility's right of way for generation and transmission assets. The risk analysis must include, at a minimum:	See Section 3: Quantifying Wildland Fire Risk
(a) Defined categories of overall wildfire risk and an adequate discussion of how the Public Utility categorizes wildfire risk. Categories of risk must include, at a minimum:	See Section 3.3: Wildfire Risk Zones, Appendix C WMP map book, and risk zone map on Idaho Power's website for detailed map of wildfire risk zones
(A) Baseline wildfire risk, which include elements of wildfire risk that are expected to remain fixed for multiple years. Examples include topography, vegetation, utility equipment in place, and climate.	See Section 3.2 for discussion of fixed risk elements.
(B) Seasonal wildfire risk, which include elements of wildfire risk that are expected to remain fixed for multiple months but may be dynamic throughout the year or from year to year; Examples include cumulative	See Section 3.2.1 for discussion of variable risk elements that change throughout the year.

Oregon Requirement—OAR 860-300-0030	Corresponding Location in WMP
precipitation, seasonal weather conditions, current drought status, and fuel moisture content. *(C) Risks to residential areas served by the Public Utility; and* *(D) Risks to substation or powerline owned by the Public Utility.*	See Section 3.2.1 paragraph 4 addresses the consideration of residential areas in risk analysis. See Section 3.2.1 paragraph 4 addresses overhead power lines. Note: Idaho Power does not model wildfire progression or spread within substations due to zero vegetation within the fenced area Also see Section 3.3.2 for discussion of risk modeling of proposed Boardman to Hemingway transmission line
(b) a narrative description of how the Public Utility determines areas of heightened risk of wildfire using the most updated data it has available from reputable sources.	See Section 3.2.1: Wildfire Risk Modeling Process and Section 11.4 Wildfire Risk Map
(c) a narrative description of all data sources the Public Utility uses to model topographical and meteorological components of its wildfire risk as well as any wildfire risk related to the Public Utility's equipment.	See Section 3.2.1: Wildfire Risk Modeling Process and the 2023 Risk Modeling Input Updates, and Section 11.4 Wildfire Risk Map
(A) The Public Utility must make clear the frequency with which each source of data is updated; and *(B) The Public Utility must make clear how it plans to keep its data sources as up to date as is practicable.*	See Section 3.2.1: Wildfire Risk Modeling Process., and Section 11.4 Wildfire Risk Map for a discussion of data source updates
(d) The Public Utility's risk analysis must include a narrative description of how the Public Utility's wildfire risk models are used to make decisions concerning the following items:	
(A) Public Safety Power Shutoffs	A) See Section 7.5 PSPS
(B) Vegetation Management;	B) See Section 8.7: T&D Vegetation Management
(C) System Hardening;	C) See Executive Summary on Infrastructure Hardening; Section 8.5: Distribution Asset Management and Inspection Initiatives; Section 11.9: Long-Term Metrics
(D) Investment decisions; and	D) Risk analysis informs Tier 2 and Tier 3 mitigation activities. See Section 4: Mitigation Approach and Section 4.5 Wildfire Mitigation Activities
(E) Operational decisions.	E) See Section 7 Mitigation-Operations and Appendix A: Wildland Fire Preparedness and Prevention Plan
(e) For updated Wildfire Mitigation Plans, the Public Utility must include a narrative description of any changes to its baseline wildfire risk that were made relative to the previous plan submitted by the utility, including the	See Section 3.2.2 Establishing Wildfire Risk Zones and Section 3.3 Wildfire Risk Zones

Oregon Requirement—OAR 860-300-0030	Corresponding Location in WMP
Public Utility's response to changes in baseline wildfire risk, seasonal wildfire risk, and Near-term Wildfire Risk.	
(2) To the extent practicable, the Public Utility must confer with other state agencies when evaluating the risk analysis included in the Public Utility's Wildfire Mitigation Plan.	See Section 3.2.2., specifically incorporating local feedback into risk zone establishment and wildfire risk zone calibration with peer utilities

Wildfire Mitigation Plan Engagement Strategies—OAR 860-300-0040

Oregon Requirement—OAR 860-300-0040	Corresponding Location in WMP
(1) The Public Utility must include in its Wildfire Mitigation Plan a Wildfire Mitigation Plan Engagement Strategy. The Wildfire Mitigation Plan Engagement Strategy will describe the utility's efforts to engage and collaborate with Public Safety partners and Local Communities impacted by the Wildfire Mitigation Plan in the preparation of the Wildfire Mitigation Plan and identification of related investments and activities. The Engagement Strategy must include, at a minimum:	See Section 10: Communicating About Wildfire
(a) Accessible forums for engagement and collaboration with Public Safety Partners, Local Communities, and customers in advance of filing the Wildfire Mitigation Plan. The Public Utility should provide, at minimum:	See Section 10.2: Community Engagement
(A) One public information and input session hosted in each county or group of adjacent counties within reasonable geographic proximity and streamed virtually with access and functional needs considerations; and *(B) One opportunity for engagement strategy participants to submit follow-up comments to the public information and input session.*	See Section 10.2: Community Engagement, Section 10.4.1: Key Communication Methods, and Section 10.4.3 Communication Metrics
(b) A description of how the Public Utility designed the Wildfire Mitigation Plan Engagement Strategy to be inclusive and accessible, including consideration of multiple languages and outreach to access and functional needs populations as identified with local Public Safety Partners.	See Section 10.2: Community Engagement and Section 10.4.1: Key Communication Methods
(2) The Public Utility must include a plan for conducting community outreach and public awareness efforts in its Wildfire Mitigation Plan. It must be developed in coordination with Public Safety Partners and informed by local needs and best practices to educate and inform communities inclusively about wildfire risk and preparation activities.	See Section 10.2: Community Engagement and Section 10.4.1: Key Communication Methods
(a) The community outreach and public awareness efforts will include plans to disseminate informational materials and/or conduct trainings that cover: *(A) Description of PSPS including why one would need to be executed, considerations determining why one is required, and what to expect before, during, and after a PSPS;* *(B) A description of the Public Utility's wildfire mitigation strategy;* *(C) Information on emergency kits/plans/checklists;* *(D) Public Utility contact and website information.*	For (A) – (D), see Section 10.2: Community Engagement; Section 10.4: Customer Communications; and Section 10.4.1: Key Communication Methods

Oregon Requirement—OAR 860-300-0040	Corresponding Location in WMP
(d) Discussion of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure. *(b) In formulating community outreach and public awareness efforts, the Wildfire Mitigation Plan will also include descriptions of:* *(A) Media platforms and other communication tools that will be used to disseminate information to the public;* *(B) Frequency of outreach to inform the public;* *(C) Equity considerations in publication and accessibility, including, but not limited to:* *(i) Multiple languages prevalent to the area;* *(ii) Multiple media platforms to ensure access to all members of a Local Community.*	See Section 10.2: Community Engagement For (A)-(C): See Section 10.2: Community Engagement; Section 10.4: Customer Communications, and Section 10.4.1: Key Communication Methods
(3) The Public Utility must include in its Wildfire Mitigation Plan a description of metrics used to track and report on whether its community outreach and public awareness efforts are effectively and equitably reaching Local Communities across the Public Utility's service area.	See Section 10.4.3: Communication Metrics
(4) The Public Utility must include a Public Safety Partner Coordination Strategy in its Wildfire Mitigation Plan. The Coordination Strategy will describe how the Public Utility will coordinate with Public Safety Partners before, during, and after the fire season and should be additive to minimum requirements specified in relevant Public Safety Power Shut Off requirements described in OAR 860-300-0050. The Coordination Strategy should include, at a minimum: *(a) Meeting frequency and location determined in collaboration with Public Safety Partners;* *(b) Tabletop Exercise plan that includes topics and opportunities to participate;* *(c) After action reporting plan for lessons learned in alignment with Public Safety Partner after action reporting timeline and processes.*	See Section 10.2.: Community Engagement

Response to OPUC Staff Recommendations

OPUC Order No. 24-231 and 24-326

The following sections address recommendations received from the OPUC Staff in Docket No. UM 2209 and UM2340 and approved by the OPUC in Order No. 24-231 and Order 24-326, respectively. The italicized text reflects the OPUC staff specific recommendations. Staff recommendations from Order No. 24-231 indicated for the 2026 WMP filing are not included below. On December 31, 2024, Idaho Power filed a comprehensive 2025 Wildfire Mitigation Plan which includes all key plan elements for the 2025 calendar year.

Idaho Power Recommendations (Order 24-231)

OAR 860-300-0020 (1)(a)(A) and (B)

(1) Explain the rationale for the 240-meter buffer around assets.

Response: Idaho Power's models ignitions 120M on either side of an overhead powerlines, resulting in a 240-meter buffer around assets. This distance extends modeled ignitions outside of roadways (necessary as models generally classify road mediums as unburnable) without overestimating modeled ignition relative to powerline infrastructure. The buffer distance additionally enables gradients in modeling, which is necessary for identifying and comparing outputs.

(2) *Provide explanation of the method Idaho Power used to differentiate Yellow Risk Zones (YRZs) from Red Risk Zones (RRZs) (particularly with the recent modification of the area around Halfway, which transitioned to a Red Risk Zone).*

Response: Idaho Power uses the terms Tier 3 and Tier 2 to identify its wildfire risk zones. Tier 3 is color coded red on maps and Tier 2 is color coded yellow. Idaho Power infers that this recommendation applies to Tiers 3 and 2. Section 3.2.1 details Idaho Power's process for risk modeling. Section 3.2.2 of the WMP details Idaho Power's process for establishing wildfire risk zones. These processes were utilized during Idaho Power's wildfire risk model update completed in 2023, resulting in changes to risk zones in Oregon.

OAR 860-300-0020 (1)(b)

(4) Explain how risk mitigation results in changes in utility risk.

Response: Section 4.2 of Idaho Power's 2025 WMP discusses the company's framework for understanding the potential consequences of wildfire damage and the possibility of diminishing those consequences through targeted mitigation activities. In 2024, Idaho Power began work to enhance existing risk quantification methods by integrating asset parameters, such as age, conductor type, phasing, and outage history, into the company's

existing risk data. The team will continue this work in parallel with the implementation of new wildfire risk modeling software, Technosylva, to ultimately lead to a detailed distribution circuit-specific analysis. This analysis will also help establish a baseline that will enable calculation of the risk reduction benefit (RSE) from specific mitigation practices.

OAR 860-300-0020 (1)(c)

(5) Continue evolution of Tables 7 and 9, detailing state-level annual estimates and units for each mitigation tactic, with the resulting estimated risk reduction.

Response: A state-level break down is included in Tables 7 and 9 in the 2025 WMP. Section 4.5.1., *Quantifying Wildland Fire Risk*, details Idaho Power's ongoing efforts to estimate risk reduction associated with each mitigation tactic.

OAR 860-300-0020 (1)(d)

(6) Include details about command structure used during emergency activation, whether National Incident Management System (NIMS), Incident Command System (ICS), or other standards.

Response: Idaho Power's process and command structure for PSPS activations is detailed in Appendix B, Idaho Power Company's Wildfire Public Safety Power Shutoff Plan. In 2024, members of the Idaho Power Wildfire Mitigation team who are responsible for PSPS protocol participated in FEMA Incident Command System Training resulting in certificates of completion for FEMA ICS-100 and ICS-200 courses.

(7) Identify general frequency and types of interactions with public safety partners.

Response: Section 9.5, *Public Outreach and Communications*, and Section 10.2, *Community Engagement*, of the 2025 WMP provide a detailed description of the process and frequency of annual interactions with public safety partners. Appendix B, Idaho Power Company's Wildfire Public Safety Power Shutoff Plan, details frequency and interactions with public safety partners during active PSPS events.

OAR 860-300-0020 (1)(e)

(9) Identify Community Based Organizations who are participating in community outreach supportive of Public Safety Power Shutoffs and what specific actions they are taking.

Response: Unlike more populus portions of Oregon, the portion of eastern Oregon that the company serves has very few community-based organizations, let alone organizations with the capacity to participate in community outreach for PSPS. The company approaches its outreach and engagements efforts for the WMP and PSPS

plan by identifying and targeting effort to reach as many stakeholders as possible, including public safety partners, critical facilities, and the community.

Each year, prior to wildfire season, communications begin with public safety partners, including the Idaho and Oregon state offices of emergency management, county emergency managers, local governments, and social service and welfare agencies. These communications are held both individually and in larger groups during Local Emergency Planning Committee meetings, where the company provides an overview of the WMP and discusses the PSPS plan and outage preparation. A detailed list of Idaho Power's 2024 meeting efforts is included in table 17 of the 2025 WMP.

Additionally, to ensure messaging reaches access and functional needs customers, the company collaborates with the Living Independent Network Corporation, the Southwest Idaho Area Agency on Aging, and Norco to present outage preparedness. The information provided includes considerations for older adults and individuals with disabilities, and information about medical equipment considerations during an outage.

(10) Discuss how Empower is used in Idaho Power's Oregon service territory.

Response*:* The Health and Human Services emPOWER Program offers a secure tool which allows local public health personnel access to addresses for individuals utilizing Medicare who have been provided durable medical devices. Idaho Power has tested our mapping capabilities with HHS to ensure we are able to provide outage boundary files compatible with emPOWER. When conducting pre-season outreach with county partners, Idaho Power includes an overview of the EmPOWER program, and how to utilize the system during PSPS events. To-date, the Oregon counties we serve have not elected to participate with the program.

(11) As appropriate, identify how customers are able to use battery rebate or other programs to improve resilience to events such as Public Safety Power Shutoffs.

Response: Idaho Power does not currently offer a battery rebate program. Section 10.2 provides a comprehensive overview of the company's approach to outreach and engagement around the WMP and PSPS, including communications during a PSPS, wildfire prevention, community resilience efforts, and emergency outage preparedness.

OAR 860-300-0020 (1)(g)

(14) Discuss timing of inspection and correction frequency inside and outside high fire risk areas.

Response: Table 13 in the 2025 WMP provides a summary of asset inspections and schedule by state and risk zone. Corrective action plans for defects are determined by engineering personnel consistent with standards governing the correction of defects and subsequently scheduled and repaired consistent with OAR 860-024-0018.

(15) Discuss and demonstrate the use of ignition risk driver analysis and ignition historic analysis to determine optimal timing and completion of inspection and correction activities.

Response: Section 8.6 of the 2025 WMP discusses Idaho Power's Ignition Tracking and Analysis. This ongoing work will continue to support the determination of optimal timing and completion of inspection and correction work.

OAR 860-300-0020 (1)(h)

(16) Discuss evolution of vegetation management program based on long term metrics developed in the Plan; where possible, continue to explore the relationship between fire history, outage history, and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.

Response: Section 4.5.6. and Section 8.7 of the 2025 WMP discuss Idaho Power's enhanced vegetation management practices, including considerations over time that have led to the company's current approach for vegetation management. Idaho Power continues to track metrics to assess efficacy of the vegetation management program and through this has identified notable long-term co-benefits, including reduced vegetation-caused outages in Tier 3 and Tier 2 risk zones. For example, the 2023 wildfire season saw an increased number of storm events, high winds, and more lightning throughout the service area than in previous years. While storm activity was higher, outages associated with vegetation fell by 27% compared to previous years—indicating that the company's vegetation management practices are reducing risk. Section 11.9 of the 2025 WMP provides additional discussion of how long-term metrics are used to assess WMP effectiveness.

In 2024, the company began work combining analytics with vegetation management activities by developing a probabilistic model called Vegetation Risk Index (VRI). The VRI is intended to help Idaho Power quantify the likelihood of vegetation contact under specific conditions, such as extreme weather events. The model considers variables such as tree density, species, outage history, and meteorology data, which helps provide insight into how atmospheric conditions may impact growth rates of certain species and where certain high-risk vegetation areas may exist as conditions change. The model is anticipated to provide a co-benefit of informing where Idaho Power may want to focus additional tree inspection activities in advance of wildfire season or on certain high-risk days that include PSPS events. Work performed thus far has demonstrated the potential benefits of combining innovative analytics with traditional mitigation practices to enhance reliability, reduce risks, and ensure public safety. Idaho Power anticipates completing an initial version of the VRI in 2025 and will begin utilizing it once it is finalized.

OAR 860-300-0020 (1)(j)

(18) Report on results of joint utility maturity model pilot work and continue advancing wildfire maturity rubric in alignment with International Wildfire Risk Mitigation Consortium (IWRMC).

Response: In 2024, Idaho Power completed the IWRMC maturity model, and analyzed and benchmarked data to inform maturation focus. Idaho Power identified four categories for maturation over the next three years. Categories, capabilities, approach for maturation, and associated implementation timelines are discussed in Section 1.5 of the 2025 WMP.

OAR 860-300-0020 (1)(k)

(19)Provide history and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.

Response: Section 4.5.6. and Section 8.7 of the 2025 WMP discuss Idaho Power's enhanced vegetation management practices, including the company's consideration of other vegetation management alternatives, including shorter trimming cycles, longer trimming cycles, and strategies that evaluate each tree individually and only trim it once it has nearly grown back to the power line (known as "just-in-time trimming"). Each alternative presented challenges or resulted in negative impacts that undermined potential benefits. The company continues to pursue additional data acquisition and analytics on its vegetation management program to assess trimming cycle optimization.

*Joint Utility Recommendations **Order 24-326***

(24-230-A) *All utilities should provide Plans that allow a determination on compliance within the body of its Wildfire Mitigation Plan.*

Response: Appendix D of Idaho Power's 2025 Wildfire Mitigation Plan meets this recommendation. The standard WMP format discussed in 24-230-D will meet the requirements of 24-230-A for the company's 2026 filing.

(24-230-B) *All utilities should provide multi-year Plans which are updated on an annual basis.*

Response: Idaho Power filed its 2025 Wildfire Mitigation Plan consistent with the requirements of 24-326. Idaho Power will file a multi-year plan beginning with the 2026 WMP.

(24-230-C) *All utilities should participate in a joint utility effort to move towards use of shared terminology throughout the WMPs. The utilities must agree upon and use a standard WMP glossary which articulates shared terminology, and any differences in use of terminology between the utilities in the 2026 Plans.*

Response: As described as part of the Phase 2 work in Order 24-230, Idaho Power is collaborating with Pacific Power and Portland General Electric on a glossary of shared terminology that will be included in the 2026 WMP filing.

(24-230-D) *All utilities should provide WMPs in a standard format which adopts uniform chapter and section headings, as well as other agreed upon organizational features.*

Response: As described as part of the Phase 2 work in Order 24-230, Idaho Power is collaborating with Pacific Power and Portland General Electric on a standard WMP format with uniform chapter and section headings and other agreed upon organizational features.

(24-230) *All utilities should provide the program level details though standard reporting templates.*

Response: Standard reporting templates were approved in Order 24-326 at the September 19, 2024, Public Meeting. The data tables for reporting preliminary results for the first through third quarters of 2024 are included with this filing and final, full year 2024 data will be filed by March 31, 2025.

(24-230-F) *All utilities should provide inspection and correction data through a standard reporting template which facilitates comparisons of inspection functions, costs (at unit level), and amount of work across the IOUs (and potentially bench markable across a broader region).*

Response: Standard reporting inspection and correction reporting templates were approved in Order 24-236 326 at the September 19, 2024, Public Meeting. Data Tables 3-T&D Inspection and 4-T&D Correction with reporting preliminary results for the first through third quarters of 2024 are included with this filing and final, full year 2024 data will be filed by March 31, 2025.

(24-230-G) *All utilities should provide vegetation management data through a standard reporting template which facilitates comparison of inspection functions, costs, and amount of work across the IOUs. Given the large costs expended or forecasted to achieve "optimal" clearance, a standard data template should include information about vegetation management program administration, work scopes, and costs by clearance objectives***.**

Response: Standard reporting inspection and correction reporting templates were approved in Order 24-326 at the September 19, 2024, Public Meeting. Data Table 5-Vegetation Management with reporting preliminary results for the first through third quarters of 2024 is included with this filing and final, full year 2024 data will be filed by March 31, 2025.

(24-230-H) *All utilities should provide industry engagement information though a standard reporting template which outlines participation in industry forums and expected information to be shared in such forums, including results from pilots prior to widescale adoption, and pilot valuation methods.*

Response: As part of the Phase 2 work described in Order 24-230, Idaho Power is collaborating with Pacific Power and Portland General Electric on a standard template for reporting

participation in industry forums as part of the standard WMP template described in Recommendation 24-230-D.

(24-230-I) *All utilities should provide pilot technology information though a standard reporting template which includes details of pilot projects, goals for the pilot, status of the pilot (planning, development, implementation), the current penetration and saturation across the system, envisioned application, milestones for determining usefulness of pilot, expected capital costs, expected O&M costs, expected timeframe for pilot implementation and lifespan. At minimum, this level of detail is needed for the following pilot technologies:*

- *Communicating Fault Circuit Indicators (CFCI).*
- *Fuel load reduction projects.*
- *Wildfire detection cameras.*
- *Early fault detection.*
- *Drone inspection pilot.*
- *Distribution fault anticipation*
- *Covered conductor or spacer cable; and*
- *Infrared patrols.*

Response: As part of the Phase 2 work described in Order 24-230, Idaho Power is collaborating with Pacific Power and Portland General Electric on a standard template for reporting pilot technologies.

(24-230-J) All utility risk maps should originate from a foundational utility risk map which considers the logical set of variables. Short range outlooks, as well as mid-range outlooks may inform the foundational map. After developing the foundational map, a utility risk map can consider and overlay a variety of conditions, such as response times and locale as well as locations where mitigations have taken place or recent fuel has been removed. Any adjustments made to the foundational risk maps or the outlooks, should be explicitly identified and recorded as to what variable caused the change and what new information supported this change.

Response: Idaho Power's process for establishing wildfire risk zones is discussed in detail in section 3 of the 2025 WMP

(24-230-K) All utilities should collaborate to calibrate their risk modeling methods and identify the underlying assumptions in determining line segment risk. Some of the assumptions might include fire spread modeling periods, probability being considered, fire weather history, and inclusion of response likelihood. This work approach would result in fundamental agreement on a specific modeling method for which each utility would produce its current asset register, as well as GIS and tabular data identifying the risk scoring for each asset.

Response: Idaho Power will participate in the OPUC Staff lead WMP working group described in Order 24-230 to discuss risk modeling methods and underlying assumptions in determining line segment risk.

(24-230-L) The WMP working group should adopt Risk Mitigation and Cost Valuation (RSE) as part of its area of focus. This Staff led working group should propose risk quantification guidelines to the Commission for implementation in the 2026 WMPs. RSE should reflect granular data for electric assets which quantify risk that is derivative of operational data (include outage and device state information), observational data (inspections), temporal data (snapshots in time related to peripheral systems). RSE should also reflect data that fully comprises all the facilities that are part of the utility's HFRZ. Consistency of terminology, data sources and their confidence, and expected calculation processes should be prepared by the utilities with consistent guidance by the PUC. In addition, RSE needs to recognize the way "risk" is quantified by the utility, result in an agreed-upon method for the quantification and the manner that reduced risk will be measured.

Response: Idaho Power will participate in the OPUC Staff lead WMP working group described in Order 24-230 regarding risk quantification guidelines.

(24-230-M) *All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, surrounding system reliability. At minimum, this effort should include discussion of sophisticated protection control equipment and its application to sensitive settings, consideration of impact to reliability, in particular the response during elevated risk season with repeated outages to customers when "self-healing" is not in place (resulting in them experiencing nuisance trips). This group should not only consider impacts to system level reliability but consider impacts of momentary interruptions and longer sustained outages to remote customers, particularly those which may be less able to sustain during poorer reliability periods.*

Response: Idaho Power participates in numerous industry working groups to share best practices regarding system reliability. See section 2.3. Industry and Peer Utility Engagement of Idaho Power's 2025 WMP.

(24-230-N) *All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, for identifying and coordinating with Public Safety Partners, building on the ground relationships and communication, developing livestream/recorded multi-language community meetings, and coordinate with local communities to participate in safety fairs.*

Response: Idaho Power participates in numerous industry working groups to share best practices regarding coordinating with Public Safety Partners. See section 2.3. Industry and Peer Utility Engagement of Idaho Power's 2025 WMP

(24-230-O) *All utilities should collaborate to develop consistent content (and should conform to generally consistent language) to inform customers, communities and public safety partners about operational protocols which can impact their power reliability and power system operations. As a complement to these approaches, utilities should perform analysis regarding the location-specific impacts to reliability, including the increase in customer complaints internally as well as those recorded by the OPUC consumer services division, and develop methods to quickly react to heightened operations impacting customers' reliability. Customers and communities may benefit*

from awareness of other outage causes (beyond weather), which impact reliability and during "sensitive settings" or "fire season" period or which could result in unusual reliability.

Response: Idaho Power attended a one-day workshop hosted by Pacific Power on November 19, 2024, in Portland, Oregon to meet with communications teams from western utilities to discuss wildfire communications. Events included discussions on internal communications, digital media, paid media, media relations, community engagement, lessons learned from the 2024 wildfire season with a look ahead to 2025 challenges. Communications teams were invited from AltaLink, ATCO, Avista, Fortis Alberta, Fortis BC, NV Energy, Pacific Gas and Electric, Pacific Power, Portland General Electric, Puget Sound Energy, Rocky Mountain Power, San Diego Gas and Electric, and Xcel. Two additional workshops are planned for March and November 2025.

Idaho Power is reporting customer reliability complaints and inquiries and OPUC recorded reliability complaints in Table 7-Risk Performance of the data templates submitted as part of this filing.

(24-230-P) All utilities should collaborate to develop a "template" for reporting PSPS details during the execution of a PSPS.

Idaho Power will collaborate with Pacific Power and Portland General Electric to develop a template for reporting the details of a PSPS event. This work will be initiated following the completion of Phase 2 work as described in Order 24-230.