

IDAHO & MONTANA

2026 WILDFIRE MITIGATION PLAN



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Idaho and Montana Wildfire Mitigation Plan 2026

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Section

1

Introduction



1. Introduction

1.1. Overview

Idaho Power is focused on the safety of its customers and communities and to safely delivering reliable, affordable energy. The purpose of Idaho Power's Wildfire Mitigation Plan (WMP) is to guide mitigation strategies and reduce risk. The company's WMP identifies methods and means for mitigating wildfire risk that reflect a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

1.2. 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 to this trend, including changing climatic conditions, increased human encroachment in wildland areas, historical land management practices, and changes in wildland and forest health. Idaho has not experienced fires to the same magnitude as some other western states,¹ but warmer temperatures, reduced snowpack, and earlier snowmelt contribute to drier conditions, extending the period of heightened fire risk.²

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). For example, in 2024, the director extended wildfire season to November 1, 2024.³

Montana's wildfire season is defined by Montana Code § 76-13-102 as the period of each year beginning May 1 and ending September 30. Similarly, Montana's wildfire season can be extended by the Montana Department of Natural Resource pursuant to Montana Code §76-13-203.

1.3. 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 public utility commissions of Idaho and Oregon. Idaho Power's service area includes 24,000 square miles across southern Idaho and eastern Oregon, with approximately 19,255 square miles of that service area in Idaho (Figure 1). The company serves more than 650,000 customers, approximately 630,000 of which reside in Idaho.

¹ Wildland Fire Summaries 2019-2024. [Statistics | National Interagency Fire Center \(nifc.gov\)](#) July 29, 2025

² Western Fire Chiefs Association. [Idaho Fire Season: In-Depth Guide | WFC](#) Accessed October 8, 2024

³ [Idaho Department of Lands Rescinds Extended Closed Fire Season Order - Department of Lands](#)

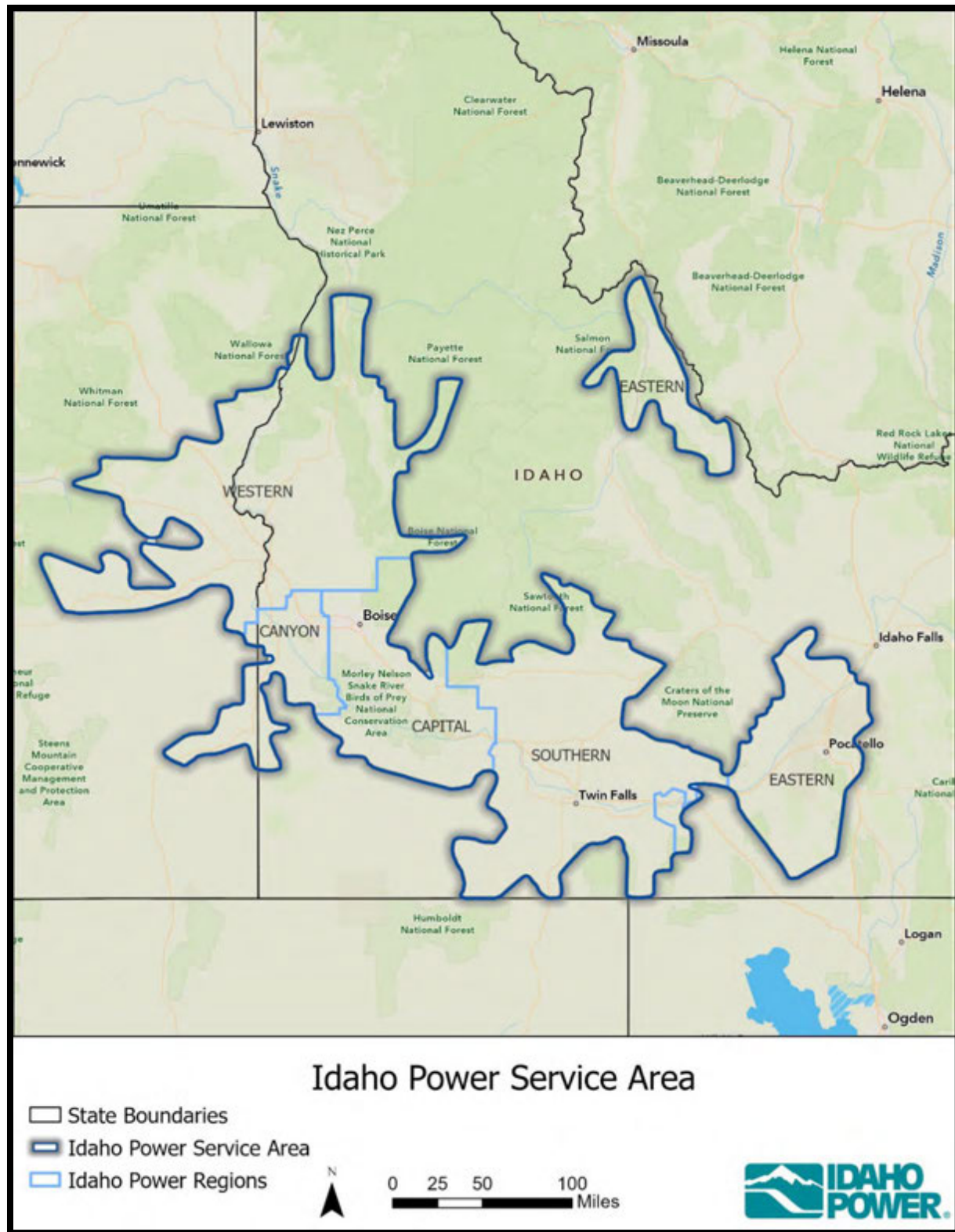


Figure 1
Idaho Power service area

1.4. Asset Overview

Idaho Power delivers electricity to customers via 317 substations, approximately 4,688 miles of overhead transmission lines, and approximately 19,320 miles of overhead distribution lines. Approximately 79% of Idaho Power's transmission line assets are in Idaho, with approximately 1% being in Montana.

Approximately 89% of Idaho Power's distribution line assets are in Idaho. Table 1 summarizes the overhead powerline asset information by state. Additional detailed information on Idaho Power's assets is included in Section 7.

Table 1

Overhead transmission and distribution line mileage and substations by state*

Asset- OH** Pole Miles	TOTAL	IDAHO		OREGON		MONTANA		NEVADA		WYOMING	
	Line Miles	Line Miles	%	Line Miles	%	Line Miles	%	Line Miles	%	Line Miles	%
46 kV Transmission Lines	373	373	100.00%		0.00%						
69 kV Transmission Lines	1,035	665	63.00%	320	32.00%	50	5.00%				
115 kV Transmission Lines	3			3	100.00%						
138 kV Transmission Lines	1,461	1,254	85.00%	141	10.00%			66	5.00%		
161 kV Transmission Lines	84	84	100.00%		0.00%						
230 kV Transmission Lines	1,154	935	81.00%	219	19.00%						
345 kV Transmission Lines	475	365	77.00%		0.00%					110	23.00%
500 kV Transmission Lines	103	53	51.00%	50	49.00%						
Total OH Transmission Lines	4,688	3,729	79.20%	733	16.00%	50	1.10%	66	1.40%	110	2.30%
Total OH Distribution Lines	19,320	17,221	89.20%	2,099	10.80%						
Total OH Pole Miles	24,008	20,950	87.20%	2,832	11.90%	50	0.20%	66	0.30%	110	0.50%
Asset-Substations	TOTAL	IDAHO		OREGON		MONTANA		NEVADA		WYOMING	
	Substations	Substations	%	Substations	%	Substations	%	Substations	%	Substations	%
Total # Substations	317	277	87.38%	37	11.67%	2	0.63%	1	0.32%	0	0

*Numbers are approximate. "Total # Substations" only includes Idaho Power-owned facilities.

** OH refers to overhead lines.

1.5. Legal and Regulatory Context

As allowed by the Wildfire Standard of Care Act (WSCA), Idaho Code § 61-1801 et seq., Idaho Power filed this Idaho and Montana 2026 WMP with the Idaho Public Utilities Commission (IPUC) for approval by the Commission as to the Idaho portion of the plan. Idaho Code § 61-1803 codifies the specific elements required to be documented within a WMP. The IPUC also issued Order No. 36774 governing the filing requirements of a WMP in Case No. GNR-E-25-02. This WMP complies with these requirements.

Pursuant to Montana Code Section 69-2-XX2,⁴ effective May 13, 2025, Idaho Power also filed this WMP with its statutory “approval authority,” as the appropriate body responsible for its corporate governance. Montana Code Section 69-2-XX2 establishes requirements for the WMP as to the Montana portion of this plan.

Prior to the adoption of the WSCA, Idaho Power filed a WMP covering both its Idaho and Oregon 2025 operations (known as the *2025 Wildfire Mitigation Plan*) with the IPUC for informational purposes on February 13, 2025, in Case No. IPC-E-25-05. Idaho Power will submit a separate WMP filing to the Public Utility Commission of Oregon (OPUC) December 31, 2025, that pertains to its operations in Oregon.

1.6. Summary of Idaho Power’s Plan for Mitigating Wildfire Risk

Idaho Power’s approach to mitigating wildfire risk is designed to protect the public interest and reflects the size and complexity of Idaho Power’s operations and the specific fire risks present within the areas in Idaho and Montana where Idaho Power has infrastructure or equipment. The WMP is built around the following key components, which are detailed in subsequent sections.

- **Geographical Risk Assessment.** Idaho Power uses a risk-informed approach that considers wildfire probability and consequence to identify areas that may be subject to potential heightened wildfire risk in areas where Idaho Power has infrastructure and equipment.
- **Mitigation Approach.** The company employs a risk-informed cost and benefit balancing approach to select and prioritize wildfire mitigations carried out to reduce the risk of wildfire, such as the following:
 - Situational awareness capabilities;
 - Workforce preparedness;
 - Operational practices, including enhanced protection settings;
 - Asset management and inspection programs;
 - System hardening and other line design strategies;
 - Vegetation management around electric infrastructure;

⁴ Montana House Bill 490 (2025), Chapter No. 68. Title and codification subject to determination by the Montana Code Commissioner.

- Additional preventative actions and programs;
 - Customer and stakeholder communication and outreach; and
 - Coordination with government agencies, industry groups, and peer utilities
- **Performance Monitoring.** Idaho Power monitors program performance and compliance.

In this document, Idaho Power lays out its intended wildfire mitigation efforts for 2026. All plans identified by Idaho Power are subject to change due to operational experience or factors beyond Idaho Power's control, including emergencies, adverse weather, unplanned events, permitting or contracting delays, supply chain issues, or acts of God. This plan covers Idaho Power's WMP efforts in both Idaho and Montana during 2026. A new plan will be filed annually that contains requirements for the corresponding year.

Section

2

Geographical Risk Assessment



2. Geographical Risk Assessment

2.1. Objective

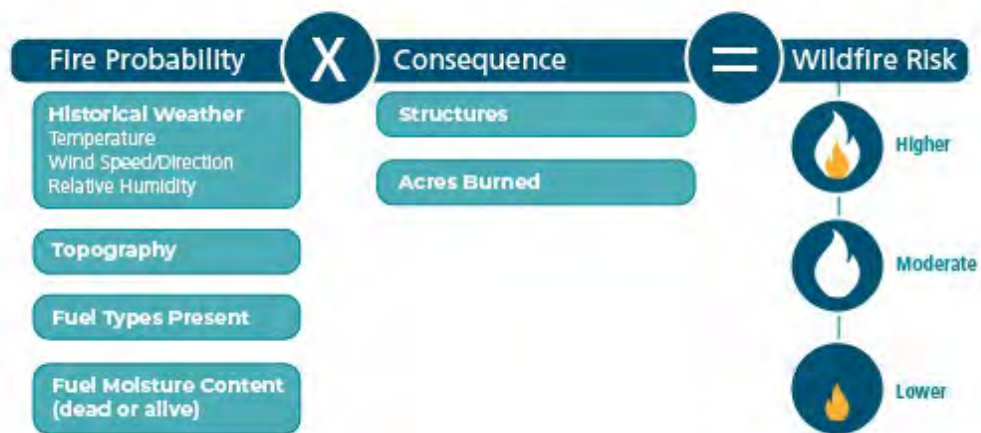
Idaho Power’s approach to mitigating wildfire risk starts by assessing wildland fire risk using qualitative and quantitative strategies to identify geographic areas that may be subject to a heightened risk of wildfire where Idaho Power has infrastructure and equipment. Those areas are identified as wildfire risk zones. Mitigation actions and programs are prioritized for those areas.

2.2. Identifying Areas of Heightened Wildfire Risk

Idaho Power has worked with an external consultant that specializes in assessing and quantifying the threat of wildfire in different geographic areas through a risk-based methodology for wildfire spread modeling.⁵ This approach is used by other utilities in California, Oregon, Idaho, Montana, Nevada, and Utah to identify and quantify wildfire risk.

This wildfire risk-based methodology is consistent with conventional definitions of risk — an event’s probability is 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 2.

⁵ 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).

**Figure 2**

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 relative to 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 acres burned and structures (i.e., homes, businesses, other human-made structures).
- **Wildfire Risk.** Fire Probability multiplied by the Consequence. The highest wildfire risk areas are those where both the Fire Probability and Consequence are elevated. Combinations of low Fire Probability and elevated Consequence, or elevated Fire Probability and low Consequence, typically indicate lower wildfire risk.

2.2.1. Wildfire Risk Modeling Process

The wildfire risk modeling process employed by Idaho Power incorporates the following major steps:

1. A 12-year fire weather climatology was developed using the Weather Research and Forecasting (WRF) model to recreate historical days of fire weather significance in geographic areas where Idaho Power has infrastructure and equipment. 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 areas where Idaho Power has infrastructure and equipment 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 used to provide high-resolution (approximately 100 feet) fuel rasters for use in fire spread modeling.⁶
4. The data developed above (WRF climatology, live fuel moisture, and LANDFIRE data) was used to drive a Monte Carlo⁷ fire spread modeling analysis. This Monte Carlo simulation was accomplished by randomly selecting an ignition location and a day from the fire weather climatology developed in step 1 above. Ignition locations were limited in the model to be within a 240-meter (m) buffer surrounding Idaho Power's overhead transmission and distribution (T&D) lines (i.e., 120 m on either side). The model used equal ignition probability for all overhead distribution and transmission asset types.⁸ 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 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 illustrated using GIS-based wildfire risk maps.

2.2.2. Wildfire Risk Zone Establishment Process

Based on the previously described modeling processes, draft risk tiers were generated using the Jenks optimization method to bin the resulting risk model data, reflecting risk relative to the modeled areas. Jenks optimization is a data classification method commonly used to determine best arrangement of values into different classes while seeking to minimize each class's average deviation from the class mean and maximizing each class's deviation from the means of the other groups. The draft tiers were then considered by Idaho Power in conjunction with qualitative factors in establishing Idaho Power's wildfire risk zones depicted in the 2026 WMP, including but not limited to ingress/egress considerations; fire

⁶ 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).

⁷ Ibid.

⁸ All transmission and distribution lines owned and operated by Idaho Power and jointly owned assets were included in the analysis. Furthermore, the proposed Boardman to Hemingway (B2H) 500-kV line route was also included in this analysis.

response capabilities; federal, state, and local fire agency input on areas of concern including home ignition zones; and customer input gained during outreach meetings on factors such as neighborhood growth in the wildland urban interface and areas of community concern. This consideration process is detailed in Figure 3.

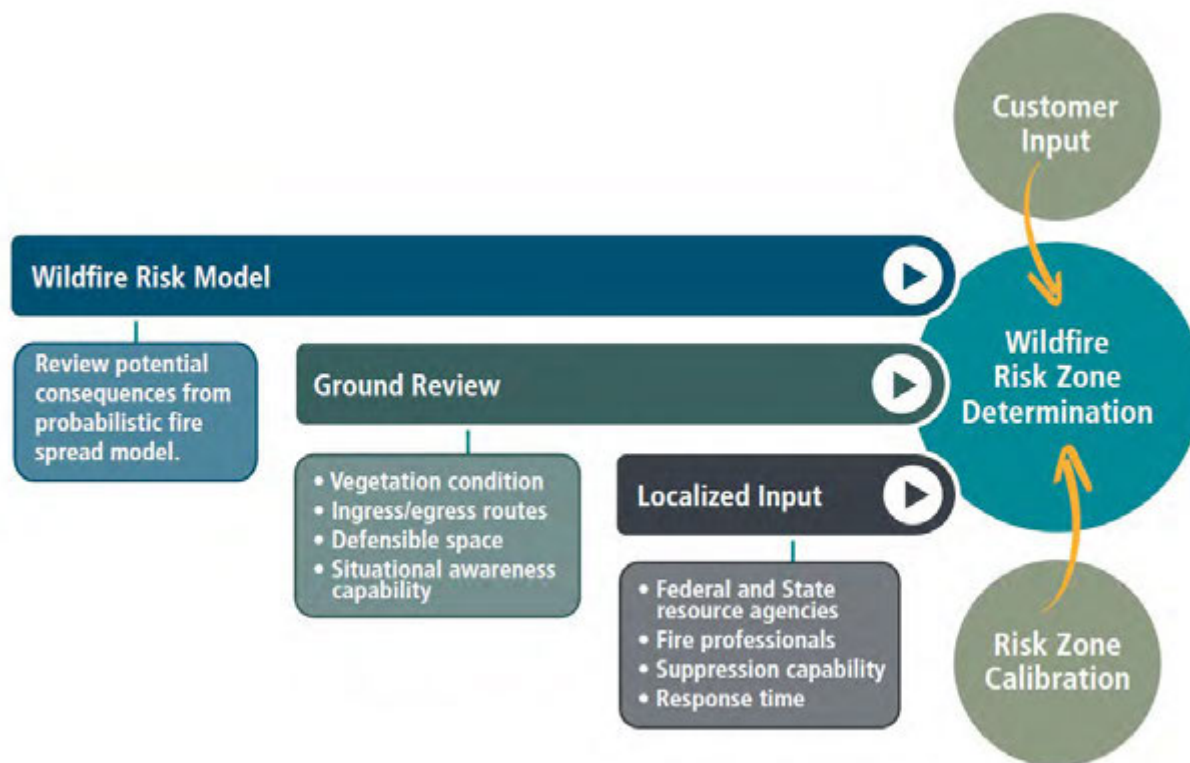


Figure 3

Risk zone evaluation and determination process

Incorporating Local Feedback into Risk Zone Establishment

At least once during each calendar year, Idaho Power attends a Local Emergency Planning Committee (LEPC) meeting. Among other topics, this forum provides a platform to receive valuable feedback from county-level public safety partners on wildfire mitigation efforts, including risk zones. Prior to the start of wildfire season, Idaho Power offers to meet with state and federal land-management agencies in Idaho to review the company's approach to wildfire mitigation and discuss wildfire season operations. These forums provide the opportunity to discuss Idaho Power's risk modeling process and gain feedback on localized areas relative to wildfire risk. The feedback gained from these collective efforts supports Idaho Power's understanding of suppression capabilities, ingress/egress routes, and localized factors that may influence fire regime, which is used as part of the qualitative assessment of risk zones.

Wildfire Risk Zone Calibration with Peer Utilities

Idaho Power engages with peer utilities and forums to benchmark and evaluate the company's WMP preventative actions and programs, including risk modeling and wildfire risk zone development. In 2025,

Idaho Power participated in conversations with Rocky Mountain Power, Portland General Electric (PGE), PacifiCorp, Bonneville Power Administration (BPA), and Avista to better understand each utility's approach to risk assessment and WMP development, based on their distinct service territories. Since joining the International Wildfire Risk Management Consortium (IWRMC) in 2023, Idaho Power has also participated in subgroups within the forum, including one focused on risk-based topics, such as risk assessments, mapping, and modeling. Idaho Power continues to work with peer utilities to inform collective understanding and decision making around wildfire risk modeling.

Ongoing Evaluation of Wildfire Risk

Idaho Power's approach to risk modeling includes iterative review. Annual⁹ qualitative risk area adjustments are used to account for unique factors that may increase or decrease risk due to changes that have occurred over time, such as wildfire events that alter vegetation composition.

2.3. Wildfire Risk Zones

Based on the process described above, Idaho Power has identified wildfire risk zones that may be subject to heightened wildfire risk: Tier 3 and Tier 2 zones. Relative to Tier 2 zones, Tier 3 zones are generally assessed under the process described above as having greater possible wildfire risk.

Idaho Power's wildfire risk zones reflect risk relative to the areas modeled by Idaho Power only, and not absolute risk. To aid in customer and public understanding, Idaho Power color-codes the tiers on maps—yellow for Tier 2 and red for Tier 3.

The following two-tier wildfire risk map in Figure 4, is illustrative of Tier 2 and Tier 3 wildfire risk zones located in Idaho. Idaho Power's modeling and assessment process determined no wildfire risk zones near its infrastructure and equipment located in Montana. Table 2 depicts total line miles of overhead transmission and distribution lines by risk zone in Idaho and Montana.

An illustrative map book of all zones located in Idaho is included in Appendix C. Appendix E illustrates the extent of Idaho Power's transmission system, including transmission line assets in Montana. A full and up-to-date 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.¹⁰

Table 2

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

Asset	Total line miles	Total line miles in wildfire risk zones	%of total lines in wildfire risk zones	Tier 2*		Tier 3*	
				Total line miles	% All Lines	Total line miles	% All Lines
Transmission Lines (ID)	3,729	375	10%	287	8%	88	2%
Transmission Lines (MT)	50	0	0%	0	0%	0	0%

⁹ All references to 'annual' or 'annually' in this WMP mean once per calendar year, unless stated otherwise.

¹⁰ Idaho Power. Protecting the Grid-Wildfire Risk Zones, accessed August 29, 2025, idahopower.com/outages-safety/wildfire-safety/protecting-grid/.

Asset	Total line miles	Total line miles in wildfire risk zones	%of total lines in wildfire risk zones	Tier 2*		Tier 3*	
				Total line miles	% All Lines	Total line miles	% All Lines
Distribution Lines (ID)	17,221	1,714	10%	992	6%	722	4%
Distribution Lines (MT)							
Total Line Miles	21,000	2,089	10%	1,279	6%	810	4%

*Except when otherwise indicated, total line mile counts encompass Idaho Power-owned lines located in Idaho and Montana only. The data reviewed by Idaho Power did not support the establishment of any risk zones in Montana in 2026.

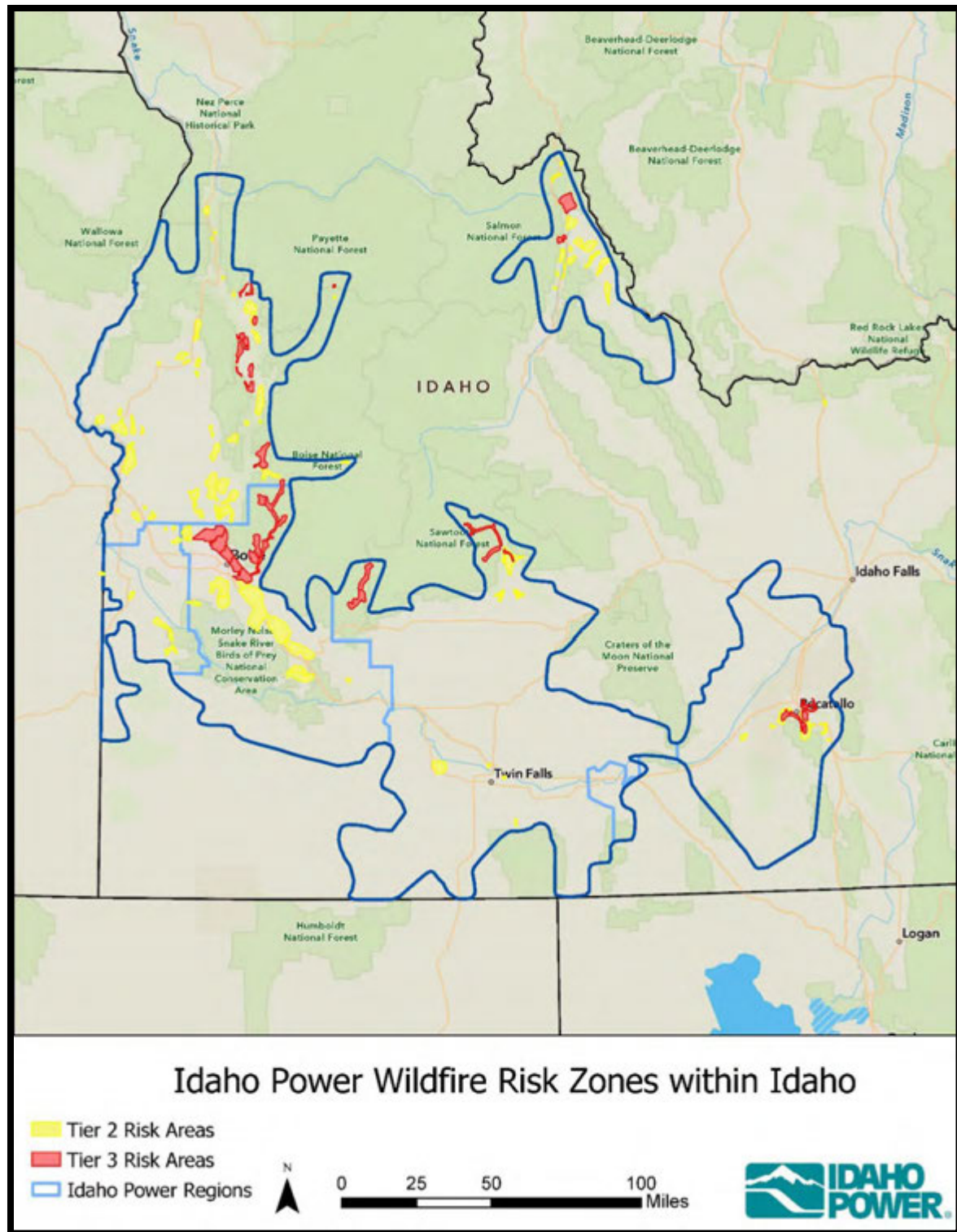


Figure 4
Idaho Power wildfire risk zones within Idaho

Section

3

Cost Benefit Approach



3. Cost-Benefit Approach

3.1. Objective

The WSCA requires that Idaho Power perform a reasonable balancing of the costs of mitigation with reduction of wildfire risk. This section details Idaho Power's risk-based cost and benefit approach to selecting wildfire mitigations. Idaho Power's WMP is designed to reasonably balance the costs of mitigation activities with the resulting reduction in wildfire risk.

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

Idaho Power's cost-benefit approach to selecting wildfire mitigations starts with understanding the potential costs of wildfires, assessing drivers of potential wildfire risk, and, finally, using a variety of strategies to select cost-effective mitigations to reduce wildfire risk.

In assessing the potential consequence of wildfire risk, Idaho Power considered several sources of data on the costs of major wildfires.

The recoverable damages in wildfire litigation in Idaho are identified in Idaho Code § 61-1806(2). The recoverable damages in wildfire litigation in Montana are similar and are set out in Montana Code Section 69-2-XX2. Wildfire costs can also include the cost of restoring Idaho Power property.

Ultimately, Idaho Power found that obtaining a precise calculation of the potential costs of future wildfires is not possible. Quantifying the precise costs of wildfires is inherently uncertain because outcomes vary by jurisdiction, weather, fuels, topography, location, population density, and exposure. Litigation outcomes and community impacts can also differ widely from event to event. Additionally, while fire suppression costs can be roughly estimated on a per-acre basis; the actual cost of fire suppression can vary greatly depending on the same variety of factors.

Nonetheless, publicly available analyses of recent wildfires illustrate the magnitude of potential avoided costs when prudent mitigation reduces the likelihood or consequences of catastrophic events. For example, in Idaho, the Moose Fire in 2022—which grew to approximately 130,000 acres—cost approximately \$100 million to suppress,¹¹ as did the Pioneer Fire in 2016.¹² The Charlotte Fire in Pocatello (2012) destroyed 66 homes, burned approximately 1,038 acres, and estimates at the time gauged damages at \$12 million, though officials noted that timely response helped protect approximately \$472 million in property value.¹³ In eastern Washington in 2023, the Gray and Oregon

¹¹ Idaho Rangeland Resource Commission, Steve Stueber, *Careless Camper Ignites Moose Wildfire*, idrange.org/range-stories/central-idaho/human-caused-moose-fire-causes-widespread-impacts/#:~:text=The%20Moose%20Creek%20fire%20ended,fires%20five%20miles%20away%2C%20downwind.

¹² Fire Research and Management Exchange System, [frames.gov/documents/catalog/calkin et al 2016 PioneerFireInquiry.pdf](https://frames.gov/documents/catalog/calkin_et_al_2016_PioneerFireInquiry.pdf).

¹³ Debbie Bryce, *3 Years Later – Survivors remember the devastating 2012 Charlotte Fire*, Idaho State Journal, June 28, 2015, idahostatejournal.com/members/3-years-later-survivors-remember-the-devastating-2012-charlotte-fire/article_04fd7bd8-1d64-11e5-bd2f-ab6d571a8626.html.

fires together destroyed over 350 homes and caused multiple fatalities.¹⁴ Costs and damages associated with the 2020 Idaho wildfire season alone are estimated between \$100 to \$250 million.¹⁵

In more catastrophic events outside of Idaho, the costs are exponentially higher. The recovery costs of the Maui wildfires in 2023 are expected to exceed \$12 billion,¹⁶ and in California, costs and damages associated with the 2025 Los Angeles wildfires are estimated between \$28.0 billion and \$53.8 billion.¹⁷

This data supports the conclusion that the costs of Idaho Power's wildfire mitigation efforts, summarized in Section 14 below, are reasonable investments to avoid the potential costs associated with wildfire.

3.3. Risk Analysis and Drivers

Idaho Power's next step in selecting cost-effective mitigations is to understand potential wildfire risk drivers. Idaho Power's risk management framework is reflected in the six distinct steps summarized in Figure 5.

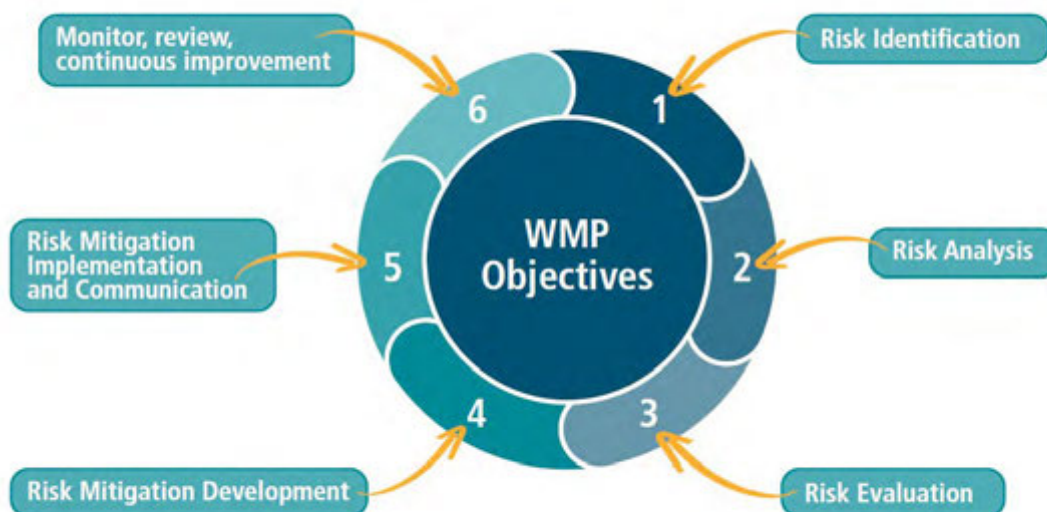


Figure 5

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. While not all risk can be

¹⁴ ArcGIS StoryMaps, Gray and Oregon Wildfires, storymaps.arcgis.com/stories/9a77e2ece6d6421ebc9c6a60635742c8.

¹⁵ Shaun Goodwin, *Wildfires and droughts: Idaho's costliest climate disasters since 2020 have cost billions*, Idaho Statesman, January 14, 2023, idahostatesman.com/news/weather-news/article271122137.html.

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

¹⁷ Matt Horton et al., *Impact of 2025 Los Angeles Wildfires and Comparative Study*, Institute for Applied Economics, February 2025, [LAEDC-2025-LA-Wildfires-Study.pdf](https://www.aedc.org/2025/02/LA-Wildfires-Study.pdf).

eliminated, Idaho Power’s goal with its WMP is to proactively prepare and enhance its infrastructure and operational practices to prepare for and address wildfire risk. The company continues to work to identify, analyze, evaluate, mitigate, and monitor risks associated with wildfire.

Using this framework, Idaho Power gathered information from internal subject matter experts regarding potential ignition risk drivers and developed a risk bow-tie diagram, shown in Figure 6, as a visual representation of equipment-specific wildfire ignition risks, including key drivers, scenarios, likelihood, and potential impacts.



Figure 6
Risk bow-tie diagram

The bow-tie analysis considers the risk exposure across all Idaho Power-owned and operated overhead T&D 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 because 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, which contribute to increasing risk of wildfire.
- *Other*—Overhead powerlines may be at risk of 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 and when the event occurs and actual conditions. The impacts shown are worst-case scenarios.

Based on the results of this consultation, Idaho Power has identified the risk drivers shown in the risk bow-tie. Of these, Idaho Power focuses its efforts on selecting cost-effective mitigations to address key risk drivers. Additionally, the company annually assesses information gathered by the wildfire mitigation team pertaining to risk drivers, including information from ignition tracking efforts, and evaluates chosen mitigations.

3.4. Mitigation Selection

Idaho Power's mitigation selection is informed by its risk driver identification and its identification of wildfire risk zones. This approach allows Idaho Power to direct its mitigations toward the geographic areas and infrastructure that may be subject to heightened wildfire risk and to employ mitigations that are most likely to achieve a reduction in wildfire risk. Each type of mitigation employed by Idaho Power is designed to reduce one or more of the risk driver frequencies and/or minimize the potential impacts or outcomes.

Idaho Power's approach to selecting mitigations for wildfire risk encompasses a variety of factors, including geographical risk assessment; reasonable balancing of cost and efficacy; benchmarking and discussions with peer utilities; consultation with government entities and agencies; and consideration of potential alternatives.

To achieve risk reduction that reasonably balances mitigation costs against mitigation effectiveness, the company typically applies one or more of the following strategies, as it deems appropriate, in selecting mitigations to reduce wildfire risk drivers:

1. **Risk-informed planning and prioritization.** Mitigation is generally prioritized to circuits and segments with the highest wildfire consequence and exposure, sequencing work where potential safety and reliability benefits are expected to be greatest.
2. **Alternatives analysis.** For each mitigation, when reasonable and possible, Idaho Power evaluates feasible alternatives, including materials, configurations, and operating practices, and selects the mitigation that reflects a reasonable balancing of cost with risk reduction.

3. **Vendor and delivery evaluation.** For technology enablement, the company evaluates vendor platforms against internal/contracted builds and chooses the cost-effective delivery path that provides required functionality and integration while minimizing ongoing lifecycle costs.
4. **Procurement discipline.** Competitive sourcing, phasing, and scrutiny are used to validate performance and cost.
5. **Strategic reliance on pilot projects.** Pilot projects are used to calibrate benefit relative to cost, labor, and time. This allows Idaho Power to assess the learnings associated with each pilot project and, when Idaho Power deems appropriate, make a case-by-case determination as to whether to scale up that program, which will be determined in future WMPs.
6. **Performance monitoring and adaptive management.** Idaho Power tracks implementation performance outcomes, such as outage and ignition metrics, customer outage impacts, and operational lessons learned; results inform future scope to maintain cost-effectiveness over time.
7. **Targeted deployment of operational mitigations.** Operational mitigations are deployed to reduce duration and extent of customer impacts while reducing wildfire risk.
8. **Leveraging existing operations to reduce wildfire risk.** Idaho Power works to build on existing processes, systems, and personnel, when possible, to deploy wildfire mitigation strategies, including by augmenting existing processes with new technology.
9. **Leveraging partnership access and dollars to reduce wildfire risk.** Idaho Power partners with other entities on wildfire mitigation strategies such as fuels management and wildfire detection camera deployment to achieve risk mitigation benefits at reasonable costs for customers.

By generally using the process and strategies described above when selecting mitigation measures to reduce wildfire risk, Idaho Power believes the mitigations identified in this 2026 WMP reflect a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

In this WMP, Idaho Power introduces and discusses its wildfire mitigations in detail as follows:

- Situational awareness and monitoring efforts (Section 4)
- Workforce preparedness (Section 5)
- Line operation practices (Section 6)
- Infrastructure inspection and asset management (Section 7)
- Methods of line design, including system hardening strategies (Section 8)
- Vegetation management efforts (Section 9)

- Additional preventative actions and programs (Section 10)
- Public outreach and engagement (Section 11)
- Government, industry, and peer utility outreach (Section 12)
- Performance monitoring (Section 13)

Notably, while mitigations are primarily intended to reduce the risk of wildfire, co-benefits, such as increased safety, reliability, and resiliency of the system may also be achieved (Table 3).

Table 3

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

Wildfire Mitigation	Safety <i>Defined as the potential to pose a danger, risk, or injury to life or property</i>	Reliability <i>Defined as the ability of the power system to withstand instability, uncontrolled events, cascading failures, or unanticipated loss of system components</i>	Resiliency <i>Defined as the ability for the grid system to adapt to, withstand, and quickly recover from disruptive events or changes within the surrounding environment</i>
Situational Awareness and Monitoring	X	X	X
Operational Practices	X		
Asset Inspections	X	X	
System Hardening — Overhead	X	X	X
System Hardening — Underground	X	X	X
Vegetation Management	X	X	
Geographic Risk Assessment	X		
Public Outreach and Engagement	X		

Section

4

Situational Awareness and Monitoring



4. Situational Awareness and Monitoring

4.1. Overview

Access to current and forecasted meteorological conditions, fuel conditions, and information about fire behavior is an aspect of Idaho Power's wildfire mitigation strategy. Meteorological and fuel conditions can vary across the locations where Idaho Power has infrastructure or equipment. Idaho Power monitors forecasted and current weather data for the purpose of assessing and responding to current and anticipated fire risk. Idaho Power leverages its internal Atmospheric Science group's modeling/forecasting capabilities, its existing fire weather stations, and publicly available weather/fuel data to develop projections of current and future wildfire potential in wildfire risk zones. This wildfire potential information is then available to relevant operations personnel to factor into operational decision-making as discussed further below.

4.2. Fire Potential Index

In 2020, Idaho Power created a Fire Potential Index (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 a numeric forecast of the short-term fire threat for each of Idaho Power's wildfire risk zones. The FPI is issued, during wildfire season, for a seven-day period to provide an operational planning horizon that informs decision-making based on current and forecasted daily fire potential.

Idaho Power's FPI is based on original work completed by San Diego Gas and Electric (SDG&E), the United States Forest Service, and the National Interagency Fire Center (NIFC), and is modified for Idaho Power. 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 an internal FPI and enhancing the company's meteorological forecasting capabilities includes greater situational awareness of Idaho Power's system during critical peak summer months. Idaho Power's situational awareness activities are evaluated annually, as necessary, to support the company's wildfire preparedness. This provides Idaho Power field personnel a tool to assess the fire potential on a consistent basis in wildfire risk zones. Given the benefits that result from the FPI and enhanced forecasting capabilities, Idaho Power did not consider alternatives to the development of these critical tools.

4.2.1. FPI Components

The FPI reflects key variables as follows: the state of native grasses and shrubs (green-up), woody 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, 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, based on the variable components described below.
- **Yellow:** FPI score of 12 through 14 indicates an elevated potential for a large fire* to develop and spread, based on the variable components described below.
- **Red:** FPI score of 15 through 16 indicates a higher potential for a large fire* to develop and spread, based on the variable components described below.

*A large fire, for the purposes of FPI scoring, is a fire greater than or equal to 1,000 acres.

FPI Categories			
	Normal	Elevated	Higher
FPI Range	0 to 11	12 to 14	15 to 16

Figure 7

FPI categories

The state of native grasses and shrubs, or the **Green-Up Component**, of the FPI is determined using satellite data for locations within wildfire risk zones. This component is rated on a 0-to-5 scale ranging from very wet (lush) to very dry (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

Figure 8

Green-Up component of FPI

The **Fuels Component (FC)** of the FPI measures the overall state of potential woody 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 is 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

Figure 9

Fuels Component of FPI

The **Weather Component** of the FPI represents a matrix of sustained wind speeds and dew-point depression using the following scale. This data is sourced from the WRF products produced by Idaho Power using its High-Performance Computing (HPC) 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
≥50°F	4	4	4	5	5	6
40°F to 49°F	3	3	4	4	5	5
30°F to 39°F	3	3	3	4	4	5
20°F to 29°F	3	3	3	3	3	4
10°F to 19°F	2	2	2	2	2	3
<10°F	0	1	1	1	1	2

Figure 10

Weather Component of FPI

4.3. FPI Review and Evaluation

The FPI process is reviewed annually after completion of the fire season. Evaluation of the FPI process is used to assess and validate Idaho Power's wildfire preparedness approach.

4.4. Forecast Ensemble

In 2024, Idaho Power partnered with the National Center for Atmospheric Research (NCAR) to develop a system that uses multiple weather models to enhance forecast accuracy. This method, known as a multi-model ensemble, compares different model outputs to predict a range of possible weather scenarios.

This allows forecasters to calculate probabilities of the timing, location, and intensity of various weather events, helping them communicate potential outcomes more effectively. Idaho Power will continue to evaluate next steps for future WMPs.

4.5. Fire Weather Stations

Idaho Power's Atmospheric Science group 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. In 2026, Idaho Power plans to install approximately 55 fire weather stations in locations proximal to wildfire risk zones. Fire weather station placement is on existing powerline poles to best reflect real-time wind conditions at powerline height.

4.6. Wildfire Detection Cameras

Idaho Power contracts with ALERTWest who installs AI-enabled wildfire detection camera sites. The network of cameras and the associated software solution is used by first responders, emergency management personnel, and Idaho Power to detect wildfire, track real-time weather and fuel conditions, and allow first responders and Idaho Power to better allocate the appropriate resources in the event of a fire. Idaho Power's detection cameras are placed in locations that provide viewsheds of wildfire risk zones or company infrastructure.

While informal coordination for wildfire detection camera siting and interoperability has been occurring for the past two years between the IDL, Idaho Power, and the Bureau of Land Management (BLM), a formal recommendation was put forth by the Idaho Governor's Office in 2024¹⁸ recommending the state formalize a working group process. The recommendation included direction to the IDL, Idaho Office of Emergency Management, Office of Energy and Mineral Resources, and the Idaho Department of Transportation to establish an interoperability system that included engagement with entities participating or interested in wildfire detection camera operations. The Idaho Fire Camera Interoperability Committee (IFCIC) was established in early 2025 to deliver on the governor's recommendation.

To date, Idaho Power has installed six wildfire detection cameras in Idaho through ALERTWest in areas where they provide visibility of overhead assets or surrounding terrain in certain wildfire risk zones. These cameras are part of an AI-enabled wildfire detection camera network that totals 27 cameras owned by various members of the IFCIC. In 2026, Idaho Power plans to install up to two additional cameras in Idaho, pending site approval and permitting. By working closely with the IFCIC and local public safety partners, Idaho Power achieves efficiencies in siting locations and cost savings for its installed sites. In some cases, local partners have provided tower space at no cost, or installations were collectively designed to eliminate the need for towers all together.

Idaho Power plans to continue to collaborate with the IFCIC to identify future camera locations, focusing on opportunities that deliver mutual benefits and cost efficiencies while reducing wildfire risk.

¹⁸ Wildfire Report Recommendations, August 2024. Available at: [IOEMADMINCOPIER-20240418092717](https://www.idaho.gov/IOEMADMINCOPIER-20240418092717)

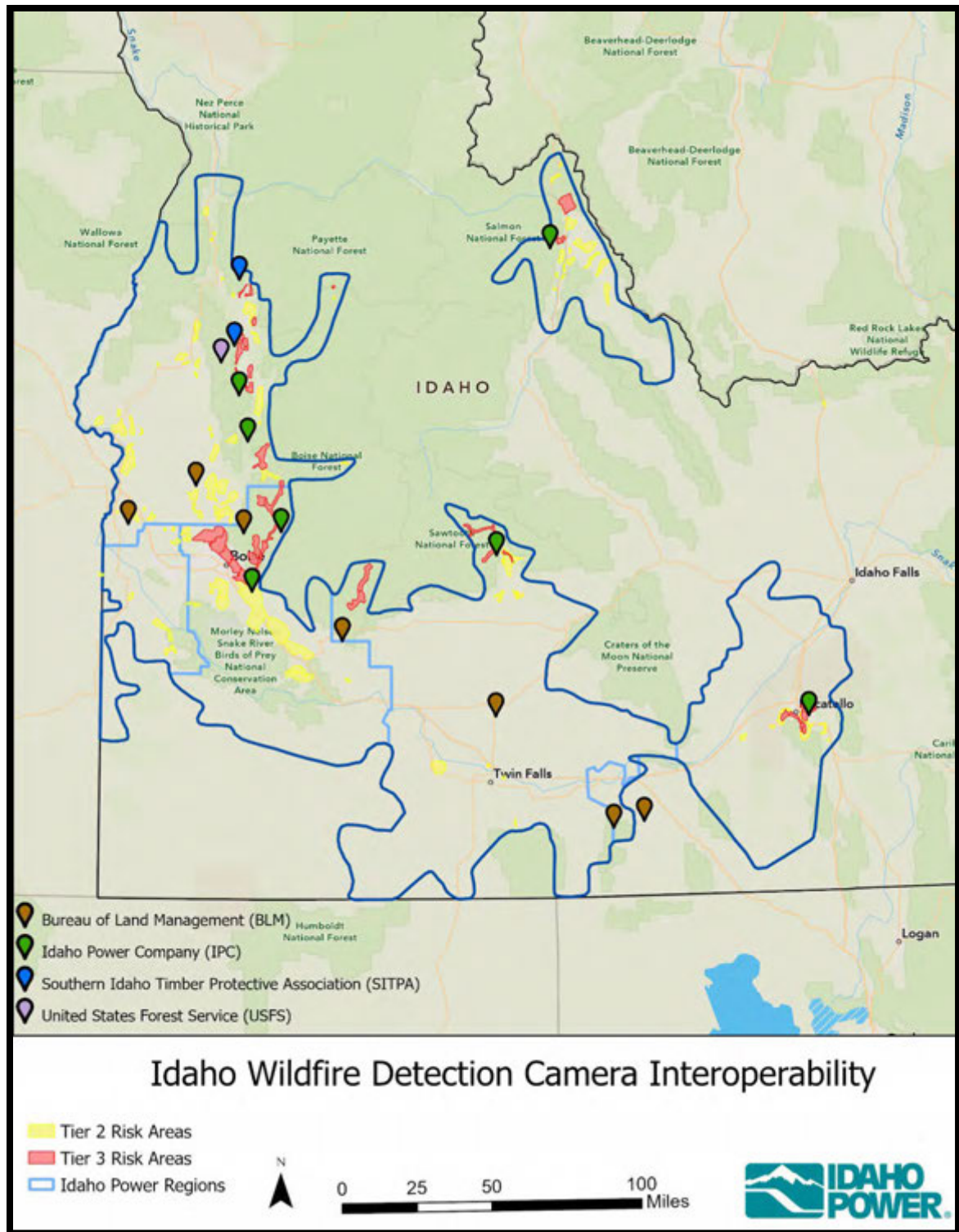


Figure 11
Idaho wildfire detection camera interoperability map

4.7. Fire Spread Predictive Tools

Beginning in late 2024, Idaho Power began integrating Technosylva's Wildfire Risk Analyst Enterprise (WFA-E) software into its approach for wildfire risk identification and quantification. WFA-E is a cloud-based SaaS platform that provides 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 FireRisk and FireSim software and forecast data, and a mitigation planning package, which includes FireSight analysis and software. Idaho Power uses the on-demand capabilities of FireSim and FireRisk in conjunction with the company's internal FPI tool to support operational decisions that reduce wildfire threats and risks. FireSight is used by Idaho Power to support ongoing assessment of geographical risk and inform mitigation investments. Each product is described in greater detail below:

- **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.
- **FireRisk** integrates weather forecasts with FireSim modeling to perform hundreds of millions of fire simulations daily to produce both current and near-term risk forecasts. New forecasts are derived daily and 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 Public Safety Power Shutoff (PSPS) de-energization analysis.
- **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, informing Idaho Power's assessment of geographic risk.

Idaho Power is still in the process of implementing this software package. Idaho Power may use FireSim for operational decision making in 2026. FireRisk and FireSight are still in the process of implementation. Their operational utilization is still being developed. The descriptions above state how Idaho Power anticipates using them once operational.

Section

5

**Mitigation
Activity:
Workforce
Preparedness**



5. Mitigation Activity: Workforce Preparedness

5.1. Overview

The nature of Idaho Power's operations can mean that employees and contractors perform work in the field during wildfire season. For this reason, Idaho Power considers wildfire risk associated with employee and contractor actions in this WMP, as described further below. Idaho Power also contracts with firefighting personnel on a case-by-case, as-needed basis to protect crews and infrastructure from direct wildfire threats.

5.2. Wildland Fire Preparedness and Prevention Plan

The *Wildland Fire Preparedness and Prevention Plan* (the Plan), included as Appendix A to this WMP, informs Idaho Power personnel about the following:

- Annual wildfire season tools and equipment required to be available when on the job site
- Daily situational awareness, including weather conditions, regarding locations with 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 for employees in those situations covered by the WMP

Idaho Power employees in situations covered by the Plan should conform to the Plan as detailed therein. Idaho Power's contractors bear responsibility for their own actions and should ensure that they take adequate fire mitigation measures. Idaho Power may also require that contractors performing field work abide by fire mitigation terms as part of their contract. These terms require contractors to follow practices intended to mitigate against wildfire mitigation risk.

Section 6

Mitigation Activity: Line Operation Practices



6. Mitigation Activity: Line Operation Practices

6.1. Overview

To reduce wildfire risk in a way that balances mitigation costs, Idaho Power implements line operational practices during heightened wildfire risk days and/or in areas with potential heightened wildfire risk. Wildfire mitigation operational practices fall in the following categories:

- Temporary operating procedures for distribution lines in wildfire risk zones during wildfire season
- Temporary operating procedures for transmission lines during wildfire season
- Idaho Power's emergency de-energization operational strategy for T&D lines related to wildfire during the wildfire season
- A PSPS strategy

6.2. Distribution Operational Protection Strategy

Sometimes called sensitive powerline settings, Enhanced Protection Settings (EPS) are used to reduce the probability of ignition during fault events on Idaho Power's distribution system. EPS are generally enabled based on the criteria described below in automatic reclosing (AR) protective devices where the zone of protection overlaps with, or is located within, Tier 2 or Tier 3 wildfire risk zones, i.e., on lines located in wildfire risk zones and/or lines that traverse a zone and extend beyond the zone's boundaries to any point of segmentation, or the end of the line. EPS helps reduce wildfire risk by operating more sensitively to fault conditions, but they also increase the likelihood of customer outages. For this reason, Idaho Power enables EPS only under the conditions and protocols defined in this WMP.¹⁹ AR protective devices include feeder relays (at head end of feeder) and reclosers.

- **EPS Mode 1:** Auto-reclose turned off. This allows only a single trip, which eliminates traditional re-energizations to test whether the fault has cleared on the line.

EPS Mode 1 is operated as a seasonal setting. It is typically enabled by wildfire risk zone grouping²⁰ only during declared wildfire season when the following conditions are met within said wildfire risk zone grouping, as determined by FPI criteria or by assessments by Idaho Power's Atmospheric Science group:

- At least 40% of the zones within a grouping reach elevated (yellow) FPI levels, or
- Any single zone within the grouping reaches a high (red) FPI level

Mode 1 remains in effect until the end of declared wildfire season.

¹⁹ Similar protection philosophies are applied in line work contexts to ensure worker safety.

²⁰ Groupings of wildfire risk zones are based on zones that have geographic areas with similar terrain, elevation, and vegetation characteristics.

- **EPS Mode 2:** Auto-reclose turned off and trip settings set to instantaneous lockout. This is a more sensitive setting that will cause the automatic reclosing device to lockout prior to most fuses. Mode 2 is designed to minimize the energy of a fault to reduce ignition risk.

EPS Mode 2 is enabled for a wildfire risk zone when the forecasted FPI is 15 or higher (red) and the forecast predicts wind speeds meeting or exceeding zone-specific wind criteria established for that zone by Idaho Power based upon historic climatology. EPS Mode 2 will remain in effect until forecasted conditions no longer warrant the setting. Idaho Power's zone-specific wind speed criteria are set out in the *2026 Operational Wind Speed Guidelines for EPS and PSPS by Risk Zone*.

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.

EPS settings are activated remotely from Idaho Power's Distribution Control Center when remote control is available through SCADA. When SCADA control is not available on an AR device, qualified company personnel enable the EPS modes manually at the AR device, which requires additional time to implement once the decision is made.

6.3. Transmission Line Operational Strategy

6.3.1. *Wildfire Season Temporary Operating Procedure for Transmission Lines 115 kilovolt (kV) and Above*

During wildfire season, Idaho Power temporarily modifies its operating procedures for transmission lines. Those modifications are, generally, as follows:

For transmission lines rated up to 230 kV, a patrol is typically required prior to re-energization. The exception is for 161 kV and 230 kV lines designated in the company's Energy Management System as traversing highly populated areas. In these cases, if the fault location can be determined with high confidence through relay fault data and GIS tools, operators have discretion to sectionalize the faulted segment and re-energize the unfaulted section to restore load without a patrol.

For 345 kV and 500 kV transmission lines, operators may exercise discretion to test²¹ the line to maintain grid reliability and stability, but only if one of the following criteria is met:

- The outage de-rates a rated path or forces curtailments
- The outage directly impacts customers or Idaho Power's ability to serve load.
- The outage strands or islands generation that is required for load service or system reliability.

²¹ A transmission line "test" or transmission line "testing" refers to the human act of re-energizing a line without completing a physical field patrol or observation of a line.

If none of these criteria apply, testing will not be performed, and the line will be patrolled prior to re-energization.

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

During wildfire season, Idaho Power determines a daily FPI as described in Section 4 of this WMP. The FPI informs the transmission line operational strategy for those lines owned and operated by Idaho Power located in Tier 3 zones. These lines will be operated in normal settings mode but with no “testing” of a line that may have “locked out”²² 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 need to be patrolled before re-energization. Alternatively, Idaho Power may choose to wait until the FPI level drops out of the red category prior to re-energizing without a patrol.

6.3.3. Transmission Lines Where Idaho Power Is Not the Operator

Idaho Power both fully owns and co-owns transmission lines in Idaho for which Idaho Power is not the FERC-registered Transmission Operator (TOP) responsible for the safe and reliable monitoring and operation according to North American Electric Reliability Corporation (NERC) standards governing transmission lines. The FERC-registered TOP for all Idaho Power full and co-owned transmission lines is responsible for determining and implementing any and all transmission line operational strategies intended to mitigate against wildfire risk. Idaho Power is not responsible to implement wildfire mitigations for lines operated by a different party.

6.3.4. De-energization by Other Electric Corporations

Idaho Power may be notified by other electric corporations in advance of de-energization if they intend to de-energize a transmission line that may impact one or more transmission lines operated by Idaho Power. Idaho Power considers the impact of potential de-energization on the bulk electric system, which includes the status of transmission lines operated by other electric corporations, when deciding whether to deenergize under Sections 6.4 and 6.7.

6.4. Emergency De-energization When Wildfire is Approaching

In the event of a wildfire near or approaching Idaho Power infrastructure, the company will conduct an emergency de-energization of overhead transmission or distribution lines only if requested by the lead firefighting agency, including the designated incident commander for that fire or those operating at the local, state, or federal level, and if Idaho Power can determine to its satisfaction the identity of the line for which de-energization is requested. The lead firefighting agency makes the determination because they are generally in the best position to analyze the fire risk and water needs in any situation, subject to Idaho Power’s bulk electric considerations noted below.

Upon a request to de-energize transmission circuits, Idaho Power will also evaluate potential impacts to overall grid reliability and system stability. Idaho Power may opt not to de-energize a transmission

²² “Lock out” refers to the process of the protection systems going through a series of trip/reclose attempts before finally staying deenergized.

segment or circuit if it determines the requested de-energization may cause grid instability or reliability issues that could impact a large number of customers (such as a de-energization that could impact 1,000 or more customers) or impact the bulk electric system, or if Idaho Power believes it poses a risk to public safety.

Idaho Power will de-energize upon a request for emergency de-energization that meets the above criteria as soon as reasonably possible. Idaho Power strives to de-energize in response to such a request within one hour of the request being validated, though in some instances the de-energization may take longer than one hour.

If Idaho Power learns of a fire located in a wildfire risk zone through a report to Dispatch or LSO, Idaho Power will enable EPS Mode 2 (when configured) on distribution lines located within that wildfire risk zone or intersecting the wildfire risk zone to the nearest zone of protection segmentation point if the following are met: (1) the FPI is 15 or higher (red) and (2) the weather forecast predicts wind speeds meeting or exceeding the zone-specific wind criteria identified above. EPS Mode 2 will remain in effect until the lead firefighting agency communicates to Idaho Power that the fire is no longer a threat to Idaho Power infrastructure or equipment, or until either the FPI or wind speed no longer justify Mode 2 enablement.

6.5. Restoration of Electrical Service After a Wildfire De-Energization

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

Following an emergency or unplanned de-energization of lines as set forth in Section 6.4, Idaho Power will use qualified line personnel to conduct “emergency” patrols (inspections) of the de-energized lines, unless Idaho Power determines a patrol is unnecessary. These patrols identify outage causes, damaged facilities, 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 or repair 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.

6.6. Mutual Assistance

Idaho Power is a member of the Western Region Mutual Assistance Group (WRMAG), of which most western U.S. 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.

6.7. PSPS

A PSPS, as used in this WMP, is defined as the proactive de-energization, when deemed appropriate by Idaho Power, of electric transmission and/or distribution facilities during extreme weather events to reduce wildfire risk. A PSPS event requires extensive planning and strategy leading up to, during, and after a PSPS event to minimize the impact of PSPS events on stakeholders.

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 these situations).
- Reactive de-energization of electric transmission and/or distribution facilities in response to existing/encroaching wildfire threatening to burn into such facilities as set forth in Section 6.4.
- Automated de-energization of electric transmission and/or distribution facilities caused by faults on the line.

6.7.1. PSPS Plan

Idaho Power developed its *Wildfire Public Safety Power Shutoff Plan* (Appendix B) to guide its implementation of this wildfire mitigation strategy. Idaho Power will conduct PSPS only in wildfire risk zones. The decision regarding PSPS is based on several dynamic factors, and each weather event is unique.

6.8. Community Resource Centers

Each county has unique needs during outage events, requiring a customized, flexible approach. Through annual meetings with county emergency managers, local public safety partners, and Local Emergency Planning Committees (LEPC), 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 for potential activation during a PSPS event.

Beginning with the 2026 wildfire season, Idaho Power will have a mobile CRC trailer that may be used in large-scale, extended outages. This unit can be staged where needed in response to sustained outages of Idaho Power equipment. The trailer is equipped with a generator, climate control, charging stations for durable medical equipment and personal devices, canopy tents for additional shade, and a monitor system to provide real-time updates about the emergency event.

Idaho Power is not responsible for providing a local emergency response or coordinating local emergency response resources; that is the role of the local emergency managers. However, if a PSPS event is forecasted, Idaho Power will strive to collaborate with public safety partners to identify and

meet the needs of the community. Services provided in collaboration with emergency managers could include the following, as appropriate, depending on the situation:

- Stand-up of a CRC
- CRC location(s) and logistics included in community outreach/outage notifications
- CRC resources
- Food, water, and other basic needs
- Charging stations for durable medical equipment and personal devices
- Potential coordination of auxiliary services, which may be used for medical services, housing assistance, family reunification, etc.

Idaho Power recognizes the challenges faced by vulnerable populations. The company also recognizes that local communities and emergency managers are specially equipped for the care of vulnerable populations in PSPS situations and defers to their expertise and abilities. Idaho Power may take measures to try to support these emergency managers and vulnerable customers during PSPS outages.

Outreach efforts also emphasize the importance of personal preparedness, particularly for customers with medical or mobility needs. Idaho Power encourages individuals to understand their unique needs and develop a plan before an outage. This includes identifying back-up power options for life-support equipment or refrigerated medications, updating contact information and outage notification preferences, and knowing where to go if power is lost. Customers are also advised to coordinate with medical supply companies or caregivers and to be aware of emergency shelters with power.

Section 7

Mitigation Activity: Infrastructure Inspection and Asset Management



7. Infrastructure Inspection and Asset Management

7.1. Overview

Idaho Power's wildfire mitigation strategy relies in part on its various asset management programs, including inspection and maintenance activities. Table 4 provides a summary of Idaho Power's T&D asset inspection programs, which will be discussed in greater detail throughout this section. The work described herein may be completed by Idaho Power employees or contractors, at Idaho Power's election.

Table 4
Overview of T&D inspection programs

Transmission	
Transmission Asset Inspection Programs	Description
Aerial Visual Inspection Program	Except where prohibited by government agencies, perform annual patrols on lines that are under the jurisdiction of the Western Electricity Coordinating Council (WECC) and non-WECC transmission lines located in Tier 3 wildfire risk zones using helicopters or drones 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 periodic structure-to-soil potential testing on select towers with direct-buried anodes at intervals determined by Idaho Power. Perform annual rectifier and ground-bed testing on impressed current corrosion protection (ICCP) systems, including measurement and recording of the results. Complete repairs and adjustments as determined by Idaho Power.
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 mitigate defects.
Ground Detailed Inspection Program	Perform 3-year cycle patrols and document identified defects according to priority. Complete repairs according to priority definition. In Tier 3 and select Tier 2 Risk Zones, patrols are performed annually.
Thermography (Infrared) Inspections	Complete inspections of targeted lines and equipment using thermal imaging (infrared) cameras.

7.2. 2026 T&D Asset Inspection Targets

Table 5

2026 asset inspection targets

Wildfire Mitigation Plan Asset Inspection Initiatives	2026 Goal
Transmission Inspections	
Wildfire Pre-Season Patrol—Tier 3 Risk Zones (structures)	1,118
Infrared Thermography Patrol (structures)	1,118
Distribution Inspections	
Wildfire Pre-Season Patrol—Tier 3 Risk Zones and select Tier 2 Risk Zones (poles)	19,382
Infrared Thermography Patrol—Tier 3 Zones (poles)	4,000

7.3. T&D Inspection Overview and Correction Timeframes

The WSCA requires that Idaho Power develop standards, procedures, and schedules— subject to timely approval of access to rights-of-way—if necessary, for the inspection of its assets, infrastructure, and facilities within the areas identified as wildfire risk zones. To meet that requirement, Idaho Power sets out the following:

Idaho Power employees or contractors inspect Idaho Power equipment for potential defects. Defects are categorized as Priority 1, Priority 2, or Priority 3 based on the following criteria:

- **Priority 1:** Defects that, depending on the circumstances, require reporting and repair as soon as reasonably possible, generally within 30 days. Timeframes can be extended as a result of conditions such as access issues, weather, and/or materials lead time.
- **Priority 2:** Defects that, depending on the circumstances, generally require reporting and correction within 24 months of identification, and the correction of these defects are scheduled during crews' normal work schedules. Timeframes can be extended beyond 24 months as a result of conditions such as materials lead time, including the correction as part of a broader project, and access issues.
- **Priority 3:** Defined by Idaho Power as potential issues that may need correction over time and should be monitored, but do not pose a threat to the system. A Priority 3 designation may also be used by Idaho Power personnel for tracking certain line construction practices. Correction of Priority 3 issues may be deferred until the next major work activity on the circuit, up to a maximum of 10 years after discovery on transmission facilities. On distribution facilities, Priority 3 issues may be monitored until the issues qualify as Priority 1 or Priority 2 defects.

Idaho Power line patrol employees receive training annually on defect classification.

Table 6 summarizes Idaho Power's inspection initiatives and frequency in relation to wildfire risk zones.

Table 6

Summary of asset inspections and schedules

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

*OH refers to overhead lines.

7.4. Wood Pole Inspection and Treatment Program

Idaho Power strives to visually inspect, sound, and bore wood poles on transmission and distribution systems 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 any of 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 classified as Priority or Non-Priority, which determines the replacement or remediation timeframe. Priority rejected poles are those with an effective circumference of less than 50% of the original circumference or 13% or less of the original strength. These poles are scheduled for replacement or reinforcement as soon as reasonably possible, generally within 30 days of being classified as rejected. Non-Priority rejected poles include all other rejected poles and are scheduled for

replacement or reinforcement within two years of being classified as rejected. Both Priority and Non-Priority replacements may be subject to delays related to permitting, access, or construction constraints.

7.5. Transmission Inspection and Asset Management Programs²³

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

On an annual basis, Idaho Power assesses the inspection needs of its transmission lines.

That determination is prioritized and approved by leadership. Idaho Power's goal is to complete 100% of the work each year; however, emergencies, operational issues, or other unplanned events can occur and disrupt the annual work plan. All work is completed in accordance with safety and applicable requirements.

7.5.1. Transmission Aerial Visual Inspection Program

Annually, Idaho Power performs aerial visual inspections of certain of its transmission lines. Idaho Power uses helicopters carrying qualified Idaho Power personnel for the aerial visual inspection of transmission lines identified as WECC Path Lines. This method of line inspection is also used on an annual basis pre-wildfire season for non-WECC transmission lines located in Tier 3 zones. UAVs serve as a supplemental inspection tool that can be deployed at Idaho Power's discretion where traditional aerial patrols are not conducted, or when patrolmen require a closer assessment of components at the top of a structure. 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 1 in some areas.

7.5.2. Transmission Ground Visual Inspection Program

Annually, qualified Idaho Power personnel (i.e., trained in transmission line inspection procedures and experienced in 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. Personnel may also be equipped with UAVs. Through these inspections, potential line defects are identified, documented, and scheduled for repair based on their classification.

7.5.3. Transmission Detailed Visual (High-Resolution Photography) Inspection Program

In addition to the annual inspections and associated maintenance noted herein, Idaho Power also completes detailed visual inspections generally utilizing high-resolution photography. This inspection is

²³ Idaho Power owns and co-owns transmission lines in Idaho for which another entity is the Operator. The Operator performs maintenance and inspection of those transmission lines. Idaho Power does not perform wildfire mitigation activities for transmission lines for which it is not the Operator.

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 set forth in Section 7.3. 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.

7.5.4. Transmission Thermal Imaging (Infrared) Inspections

Before July 1, Idaho Power annually inspects certain transmission line connectors and splices within Tier 3 zones using thermal imaging (infrared) cameras. These inspections are conducted using hand-held and drone-mounted cameras with thermal-sensing technology and can help identify defects associated with overheating equipment.

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 consistent with defect classifications. A combination of Idaho Power personnel and contracted resources are used to perform thermography inspections. Idaho Power's thermography technicians coordinate repair activities found by internal and contracted resources.

7.5.5. Transmission Cathodic Protection and Inspection Program

Cathodic protection systems are employed on select steel transmission towers. These systems use either an ICCP or direct-buried sacrificial magnesium anodes. Structure-to-soil potential testing is performed periodically at intervals determined by Idaho Power on select towers with direct-buried anodes located within wildfire risk zones. For ICCP systems, rectifiers and ground-beds are tested annually for functioning, including measurement and recording of the results. Based on test results, repairs and adjustments are completed as determined by Idaho Power.

7.5.6. Transmission Wood Pole Mesh Wrap

Idaho Power plans to install mesh wrapping on approximately 750 transmission wood poles located in the Tier 3 and Tier 2 zones in 2026 to protect the integrity of those poles. In 2025, 772 poles were wrapped with fire-resistant mesh. At Idaho Power's discretion, the company may use mesh in additional areas outside wildfire risk zones in areas that exhibit frequent fire return intervals.

7.6. Distribution Inspection and Asset Management Programs

Idaho Power's distribution inspection and asset management programs include condition-based, detailed, and ground visual inspection; distribution wood pole inspection and treatment; and line equipment inspections, as noted below.

7.6.1. 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 and Tier 2 zones selected by Idaho Power to identify Priority 1

defects (defined in Section 7.3). 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 Idaho Power inspectors deem appropriate. Helicopters may not be practical for carrying out distribution patrols in areas with greater population and structural and vegetation density. However, there are instances where the company may use helicopters on a case-by-case basis to conduct such patrols.

These inspections identify potential line defects that are visually identifiable by the inspector that might result in an outage or ignition and that need to be repaired as soon as reasonably possible. The identified defects are then documented, prioritized, and scheduled for repair consistent with defect classification, as discussed in Section 7.3.

Idaho Power strives to complete distribution inspections under this Section 7.6.1 prior to the start of each wildfire season; however, access issues may delay completion until July 1 in some areas.

7.6.2. Line Equipment Inspection Program

Idaho Power strives to inspect line equipment in all wildfire risk zones, including capacitor banks, automatic reclosing devices, and regulators, annually prior to July 1 using line operations technicians. The inspection is a visual inspection. When electronic controls are present, control data is also analyzed.

7.6.3. Thermal Imaging (Infrared) Inspections

At its discretion, Idaho Power annually inspects selected distribution lines and equipment within Tier 3 zones using thermal imaging (infrared) cameras. Identified risks are prioritized and mitigated consistent with defect classification system set out in Section 7.3.

7.6.4. 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.

7.6.5. Pole Attachments

Idaho Power is obligated by Idaho Code § 61-538 and associated regulations to allow attachments owned by third party attaching entities (i.e., cable, broadband, or telecommunications providers) on its poles. The attaching entity is solely responsible to perform its work according to industry standards, to maintain its equipment in good working order, and take steps to prevent wildfire caused by their equipment and actions.

Section

8

Methods of Line Design



8. Methods of Line Design

8.1. Overview

Idaho Power's wildfire mitigation strategy includes financially prudent and reasonably practicable methods of line design for new, planned, and existing lines to mitigate fire risk.

On an annual basis, Idaho Power assesses construction (rebuild, hardening and/or upgrade) work for its transmission and distribution lines. That determination is prioritized and approved by leadership. Idaho Power's goal is to complete 100% of the work each year; however, emergencies, operational issues, or other unplanned events can occur and disrupt the planned work. All work is completed in accordance with safety and applicable requirements. Specific wildfire mitigation design and construction practices are discussed further below.

8.2. Siting and Design of New Transmission Lines

Idaho Power uses financially prudent and reasonably practicable methods of line design for its new lines, and Idaho Power will apply this WMP to new transmission lines located in Idaho and Montana, once constructed.

8.2.1. *Transmission Steel Poles*

Idaho Power has existing wood 138-kV and above transmission poles on its system, which is allowed under this WMP. However, when building new 138-kV lines, Idaho Power will use steel poles or structures unless, in Idaho Power's discretion, the use of wood poles is more feasible than steel poles based on factors such as limited supply or availability of steel poles, engineering specifications, right-of-way constraints, permitting requirements, and project timelines. This approach is designed to enhance wildfire mitigation, improve transmission line resiliency, reduce future rebuilding costs after fire events, and provide greater reliability for customers.

8.3. Transmission Line Rebuild Projects

Idaho Power takes steps to repair or replace transmission line components on an ongoing basis as part of asset management assessments. Idaho Power considers wildfire risk as part of the prioritization of transmission line rebuild projects. These projects will increase resiliency of the transmission system related to wildfire and have the co-benefit of improving reliability for customers.

8.4. Distribution Hardening

Distribution hardening is an ongoing effort under the WMP that, to-date, remains focused on circuits in Tier 3 zones and, as with all mitigations selected, reflects a reasonable balancing of mitigation costs with reduction of wildfire risk. Overhead distribution infrastructure located in Tier 3 zones is analyzed, inspected, and hardened as Idaho Power deems appropriate using the strategies indicated below. Idaho Power's design and approach depend on inspection findings, proximity to fuels that may be conducive to wildfires, and risk model data.

Hardening investments may include line rebuilding, component change-outs, installation of covered conductor, and/or strategic undergrounding of powerlines intended to improve safety and reliability and reduce ignition risk. Idaho Power distributes hardening work across its service territory to maximize system-wide wildfire risk reduction. The company is prioritizing hardening efforts in Tier 3 zones and expects to be approximately 50% complete in all Tier 3 zones in Idaho by the end of 2025. Looking ahead, Idaho Power intends to complete 70 to 80 line-miles of hardening for 2026. To expedite completion, projects are scheduled to make efficient use of both internal construction crews and external contractors, enabling work to proceed concurrently across multiple locations. The cadence and identification of structures and equipment selected to harden is at the discretion of the Wildfire Mitigation and T&D Engineering Director, or their designee.

Prior to developing its WMP, Idaho Power successfully implemented many of the same hardening measures 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.

Idaho Power estimates spending approximately \$32 million in 2026 on distribution hardening and infrastructure upgrades across its system. Table 7 and 14 summarize 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.

Table 7

Distribution asset management targets

Initiative	Distribution Hardening Activity	2026 Planned
Distribution System Hardening*	System Hardening (miles)	72
	Overhead Line Converted to Underground (miles)	20
Feeder Segmentation	Installation or Relocation of Automatic Reclosing Devices	5

*Excludes reliability improvement projects outside of wildfire risk zones

8.4.1. Overhead Primary Hardening Program

Overhead primary hardening includes upgrading and strengthening overhead powerlines to reduce wildfire risk and improve safety. Idaho Power's core hardening strategies are listed below. These strategies and equipment were evaluated by patrolmen, trouble men, reliability engineers, and

the company's Methods and Materials department to determine cost-effective solutions that balance overall costs with expected risk reduction. Not all of these strategies are employed in all scenarios. At their discretion, Idaho Power personnel select the appropriate hardening methods on a case-by-case basis. Idaho Power's team researches and evaluates emerging technologies relative to primary hardening to determine if any should be adopted in the future. The full list of currently implemented methods is in Table 8.

Table 8

Idaho Power overhead distribution primary hardening program methods

Overhead Distribution Primary Hardening Program Methods*
• Replace "small conductor" with new 4 ACSR or larger conductor. • Replace or repair damaged conductor. • Re-tension loose conductors, including slack spans as required. • Replace wood-stubbed poles with new wood poles. • Replace rejected poles with new wood poles. • Replace wood crossarms with new fiberglass crossarms. • Replace steel insulator brackets with new steel pins/fiberglass crossarms. • Replace wedge dead ends on primary taps with new polymer dead end strain insulators. • Replace aluminum dead end strain insulators with new polymer dead end strain insulators. • Replace porcelain switches with new polymer switches. • Install bird/animal guarding. • Replace hot line clamps: • Replace aluminum stirrups. • Install avian switch cover. • Relocate arresters below the fuse. • Update the following 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 switch cover. • Update down guys. • Replace/Install down-guy insulators with fiberglass insulators. • Re-tension down guys. • Tighten hardware. • Replace all arresters with non-expulsion arresters. • Replace all expulsion fuses with energy limiting or SMU Power fuses.
* Design is informed by inspection findings and other factors considered as part of the mitigation selection process

These methods represent a toolkit of options rather than a prescriptive set of actions to be applied in every case. Not all measures will be implemented on each project; for example, newer construction may already include avian covers, polymer switches, and recently installed poles may not require

replacement. Instead, Idaho Power applies a systematic, risk-based approach in which Idaho Power designers evaluate each project in the field to determine the specific hardening needs for that location.

8.4.2. Overhead to Underground Conversion

As an alternative to conducting overhead circuit hardening upgrades, the company considers converting overhead distribution circuits in wildfire risk zones to underground and does so by reasonably balancing mitigation costs of undergrounding with the resulting reduction in wildfire risk.

Underground conversion of overhead distribution lines can provide benefits, including reduced wildfire ignition risk, improved reliability, and lower long-term vegetation maintenance needs. In certain locations, undergrounding also enhances community safety by reducing outage exposure for critical facilities and improving system resilience in areas with limited access or evacuation routes.

While underground conversions of the distribution system are used in certain circumstances, the up-front cost can vary based on voltage level, configuration, equipment requirements, permitting, and ground suitability. Underground costs are generally estimated to be higher than the cost of carrying out overhead 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 up-front investment than undergrounding. However, there may be certain risk, reliability, ongoing cost savings, and other benefits of underground infrastructure relative to overhead. Idaho Power evaluates these alternatives annually in the development of annual WMPs and is not required to undertake undergrounding or hardening measures beyond what is reasonably planned and approved for a given year.

In 2025, the company converted 12 miles of overhead powerlines to underground and plans to convert approximately 20 miles of overhead line to underground in 2026. These 20 miles reflect the company's total obligation to underground lines in 2026.

The company will select the locations for the nonconsecutive 20 miles of underground conversion in 2026 by reasonably balancing the following areas to assess costs and potential for wildfire risk mitigation:

- 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 (i.e., fire return interval).
- Community safety risks, including areas with limited egress or evacuation routes and constrained access for fire suppression resources.
- Outage exposure for critical facilities, including but not limited to hospitals, water suppliers, and nursing homes.
- Vegetation exposure, including areas with dense fuels or elevated likelihood of vegetation-related faults, such as falling trees.

- Weather vulnerability, such as locations subject to frequent lightning or high winds.
- Accessibility constraints, such as steep terrain, remote locations, or right-of-way limitations.
- 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.
- Overall number of customers that may benefit from a particular project.
- Condition and age of existing infrastructure, especially where age or type of original construction would otherwise require significant upgrades.
- Long-term operational savings, such as reduced vegetation maintenance, outage response, or wildfire-related restoration costs.

8.4.3. 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 expands its infrastructure to serve customers while balancing cost and mitigating for wildfire risk. Idaho Power evaluates 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, cost of underground construction, potential cost savings of underground relative to overhead infrastructure, and potential reliability benefits, as well as other potential benefits will be explored in each instance.

8.4.4. Feeder Segmentation

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—a practice called segmentation. Feeder segmentation may include installation of new devices, relocation of existing devices, and/or upgrading remote communication capabilities (i.e., SCADA).

Reclosers provide a point of de-energization for PSPS and are also used to implement EPS, resulting in the ability for Idaho Power to minimize impacts from de-energization and unplanned EPS outages, particularly for customers outside wildfire risk zones. Segmentation is also used to break up longer circuits in wildfire risk zones which, in the event of an outage, expedites restoration by reducing patrol time and cost by limiting the line miles that must be patrolled prior to safe re-energization.

Segmentation is most efficiently accomplished through remote-controlled devices. Remote communications allow for real time setting changes and de-energization, providing significant time saving and avoiding costs that would otherwise be incurred if devices were manually adjusted in the field.

Idaho Power prioritizes new recloser installations and upgrades based on the following criteria:

- **SCADA Operability:** The first consideration is whether an existing recloser or circuit breaker can be remotely operated via Idaho Power's SCADA system. Remote operability is key for timely and safe execution of PSPS events and eliminates the need for manual field switching during wildfire conditions.
- **EPS Compatibility:** The second criterion is the device's ability to support EPS. Existing equipment is assessed for compatibility with Mode 1 and Mode 2 configurations, and upgrades are implemented where necessary to promote reliable operation under elevated fire risk conditions.
- **Minimizing Customer Impacts:** A third factor involves identifying areas where customers are located outside wildfire risk zones but are served by circuits that extend into them. In such cases, reclosers may be strategically installed near the boundary of wildfire risk zones to isolate high-risk segments and minimize patrol times during PSPS events and help avoid unnecessary outages for customers located in lower-risk areas. The company plans to complete additional segmentation upgrades at five sites in Idaho in preparation for the 2026 wildfire season. These include installing, upgrading, and commissioning reclosers to provide remote monitoring and control, which will enable efficient implementation of PSPS and EPS Mode 1 and Mode 2 during the wildfire season, as necessary.

Section 9

Vegetation Management



9. Vegetation Management

9.1. Overview

Idaho Power's T&D Vegetation Management Program (VMP) addresses public safety, regulatory compliance, electric reliability, and helps to safeguard 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 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. As more fully described throughout this section, Idaho Power has developed standards, procedures, and schedules, subject to timely approval of access to rights-of-way, if necessary, for vegetation management within areas identified as wildfire risk zones within Idaho Power's rights-of-way or lands adjacent thereto to address potential vegetation risk to Idaho Power's power lines or other infrastructure.

Notwithstanding these obstacles, Idaho Power adheres to the VMP outlined below to the extent practicable.

9.2. Program Components

Idaho Power employs enhanced vegetation management practices in both Tier 2 and Tier 3 wildfire risk zones. These practices include mid-cycle patrols and pruning in the second year of the cycle to address "cycle buster"²⁴ trees, along with annual patrols, which may identify new hazard trees,²⁵ "hot spots,"²⁶ or unexpected vegetative growth that poses an imminent threat of contact with energized facilities. When pruning or removing trees, Idaho Power generally leaves all wood greater than 4 inches in diameter on landscaped property, and in non-landscaped areas, leaves wood in place to biodegrade.

²⁴ **Cycle Buster**—Trees that grow at a rapid rate, requiring a more frequent trimming schedule than the normal trim cycle.

²⁵ **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. Assessing whether a tree is a hazard or high priority tree requires the exercise of judgment. Idaho Power defines a Hazard Tree and the associated hazard level to be those designated in the opinion of the inspector.

²⁶ **Hot Spots**—Locations where vegetation shows evidence of contact with energized conductors or other electric system components.

In addition, Idaho Power strives to complete annual (meaning once per calendar year) audits²⁷ for all pruning work performed in Tier 2 and Tier 3 wildfire risk zones. The audits confirm that pruning cuts meet the specification and proper clearance was obtained. Table 9 summarizes vegetation management activities with respect to wildfire risk zones.

Table 9

Vegetation Management Program initiatives

Vegetation Management Program Initiatives	
Transmission	Description
Pre-Wildfire Season Inspection and Mitigation	Perform annual pre-wildfire season inspections no later than June 15* each year and mitigate noted “hot spots” and hazard trees.
Line Clearing Cycles: ²⁸ Strive to maintain 3-year cycle for valley areas and 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 annual QA/QC audits.
Distribution	Description
Pre-Wildfire Season Inspection and Mitigation	Perform annual pre-wildfire season inspections no later than June 15* each year in Tier 3 and Tier 2 zones and mitigate noted “hot spots” and hazard trees.
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 annual QA/QC audits.

* Inclement weather may limit access to overhead electric facilities prior to June 15

9.2.1. Summary of Vegetation Management Activities and Schedules

Table 10

Idaho and Montana vegetation management inspection schedule*

Inspections and Activity Schedule	Vegetation Management		
	Non-Risk Zone	Tier 2 Zone	Tier 3 Zone
Transmission			
Hazard Tree Patrol on NERC/WECC Lines	Annually	Annually	Annually

²⁷ Throughout this document, the term “audit” is used in an informal context and does not mean a formal audit conducted by the company’s Audit Services Department.

²⁸ **Line Clearing Cycles**—T&D clearing of lines defined on a periodic basis.

Inspections and Activity Schedule	Vegetation Management		
	Non-Risk Zone	Tier 2 Zone	Tier 3 Zone
Cycle Patrol/Pruning—Valley Locations	3 Years	3 Years	3 Years
Cycle Patrol/Pruning—Mountain Locations	6 Years	6 Years	6 Years
Wildfire Mitigation Patrol/Pruning	None	None	Annually
Cycle Buster Patrol/Pruning (Documented Cycle-Buster Trees)	18 Months	18 Months	18 Months
Distribution			
Wildfire Mitigation Patrol/Pruning	None	Annually	Annually
Cycle Patrol/Pruning	3 Years	3 Years	3 Years
Mid-Cycle Patrol/Pruning	None	2 Years after Cycle Prune	2 Years after Cycle Prune
Cycle Buster Patrol/Pruning	None	Covered by Mid-Cycle	Covered by Mid-Cycle
Post-Pruning Audit Inspections	Sampling	100%	100%

*Idaho Power strives to maintain the cycles identified herein. Idaho Power is working toward achieving the 3-year cycles identified in this table but may not meet them in all instances.

9.2.2. 2026 Vegetation Management Targets

Table 11

2026 vegetation management targets*

Vegetation Management Initiatives		2026 Goal (ID)
Initiative	Transition to a 3-Year Pruning Cycle (Circuits)	213
	Annual Patrol—Tier 3 & Tier 2 Risk Zones (Circuits)	139
	Annual Mitigation—Tier 3 & Tier 2 Risk Zones (Circuits)	139
	Mid-Cycle Patrols—Tier 3 & Tier 2 Risk Zones (Circuits)	15
	Mid-Cycle Pruning—Tier 3 & Tier 2 Risk Zones (Circuits)	15
	Identified Hazard Trees Pruned	100% of all identified
	Identified Hazard Trees Removed	100% of all identified
	Audits of Pruning Activities—Tier 3 & Tier 2 Risk Zones (Worksites)	100% of all identified

*Idaho Power strives to meet the targets identified herein but may not meet them in all cases.

9.2.3. Fair Market Value of Timber

If live marketable timber is identified for removal from timber company land adjacent to Idaho Power's rights-of-way, compensation at fair market price will be made available to the landowner for such timber. The process utilized to determine how fair market value was achieved will be documented and consistent with the WSCA, Idaho Code § 61-1803(3)(g)(iii).

9.3. 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.

9.3.1. 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 overhead transmission lines operating at 46 kV or higher that are located within Tier 3 wildfire risk zones once a year to identify 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*,²⁹ *medium hazard*, or *lower hazard*. 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.

9.3.2. 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. The duration of pruning cycles is influenced by vegetation type. Areas dominated by slower-growing coniferous species, such as pine and fir, can often sustain longer maintenance cycles due to slower crown expansion and reduced encroachment risk. In contrast, areas with fast-growing deciduous species, such as cottonwood, willow, or aspen, generally require more frequent pruning to maintain clearances and reduce the likelihood of contact with energized conductors. The pruning cycle in mountain areas is longer than the cycle in valley locations because the trees in mountain areas are almost entirely slower growing conifer species. 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 regrowth of sprouting deciduous shrubs and trees and extending maintenance cycles.

9.3.3. Transmission Line Clearing Quality Control and Assurance

Outside of 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

²⁹ Idaho Power defines "higher priority" vegetation as any vegetation condition likely to cause a line outage with a high risk of failure in the next few days or weeks. Higher-priority vegetation 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. Assessing whether vegetation is a hazard or higher-priority requires the exercise of judgment. Idaho Power defines "higher-priority vegetation" to be that which is designated in the opinion of the inspector.

pruning work. The audits are performed by a combination of contracted arborists and Idaho Power's utility arborists to check if 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 not properly pruned. As a result, Idaho Power requested the pruning contractor re-prune these circuits to achieve satisfactory results.

9.4. Distribution Vegetation Inspection and Management

Idaho Power strives 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 performs annual vegetation line inspections and mid-cycle clearing of the lines in the second year. The following sections describe Idaho Power's line clearing cycle and inspection processes.

9.4.1. Distribution Line Clearing Cycles

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

9.4.2. Distribution Vegetation Inspections

In addition to regular cycle pruning activities, utility arborists annually conduct ground patrols to identify potential vegetation hazards of each distribution line in Tier 2 and Tier 3 zones. Distribution patrol personnel also inspect the lines in Tier 3 and select Tier 2 zones annually. During these inspections, patrol personnel identify infrastructure defects and hazardous vegetation, within or adjacent to the ROWs, which could fall on to the distribution lines or associated facilities. The patrol personnel then evaluate, based on their experience and judgment, the level of threat posed by the hazardous vegetation by categorizing the vegetation as a *higher priority*, *medium hazard*, or *lower hazard*. Hazardous vegetation found is reported to the utility arborist and documented. Any hazardous vegetation categorized as a *higher priority* is also expected to 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.

9.4.3. Distribution Line Clearing Procedures

In most cases, vegetation is cleared as scheduled work and includes, but is not limited to, the pruning of encroaching branches, the removal of dead branches overhanging power lines, weak branch attachments, and dead or dying trees leaning toward Idaho Power facilities. Vegetation clearing methods include crews using chainsaws 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 regrowth 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 8 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 6 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.

Idaho Power strives to maintain these clearance distances throughout the full pruning cycle by using a combination of routine patrols and proactive vegetation maintenance strategies.

9.4.4. Distribution Line Clearing Quality Control and Assurance

Similar to Idaho Power's vegetation audit process for transmission lines 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.

9.5. 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 and, at the same time, help to reduce the ignition potential at the base of the pole. Where acceptable and permissible, Idaho Power removes or clears vegetation in a 20-foot radius surrounding wood poles and applies a weed-control herbicide that remains effective for several years.

Section
10

**Additional
Preventative
Actions and
Programs**



10. Additional Preventative Actions and Programs

10.1. Wildfire Suppression and Response

Idaho Power field crews carry certain fire suppression equipment for use pursuant to the *Wildland Fire Preparedness and Prevention Plan*; however, they 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 take appropriate direction from the incident commander (IC) or another fire response entity official with jurisdiction over the incident.

In 2024, Idaho Power began utilizing a contracted wildland fire engine and wildland fire personnel in certain situations to protect critical infrastructure, provide situational awareness, and coordinate with wildfire incident command. For example, in 2025 Idaho Power deployed wildland fire personnel to the Rock Fire near Tamarack Ski Resort in Idaho. In addition to attending daily situation briefings with incident command, contracted fire personnel cleared vegetation and wrapped wood distribution poles threatened by a nearby wildfire.



Figure 12

Wildland fire personnel clear vegetation and wrap poles during the Rock Fire in Idaho, 2025.

Based on the benefits demonstrated over the past two wildfire seasons, Idaho Power is evaluating options to continue to achieve these benefits moving forward.

10.2. Pilot Projects

Idaho Power uses pilot projects to learn about and assess the risk reduction benefits of newer mitigation approaches and/or technologies. Pilot projects may be considered as a complement to or alternative for existing risk mitigation approaches. These projects support learning with respect to cost, labor, and time requirements and inform risk-based decisions when comparing, selecting, and prioritizing mitigation strategies for the future.

10.2.1. Standby Helicopter Services: Pre- and Post-Event Inspections (Pilot)

Project Overview and Status: To support PSPS and post-event restoration, Idaho Power uses a pilot project with standby helicopter service to conduct pre-storm patrols, assess de-energized or damaged lines following a PSPS or wildfire, and expedite power restoration efforts. Helicopter access enhances Idaho Power's ability to assess risks and minimize customer impacts associated with wildfire events. Due

to limited availability of regional aviation resources during peak wildfire season, a standby contract structure promotes aircraft availability when needed.

Based on the benefits demonstrated over the past two wildfire seasons, Idaho Power plans to continue using standby helicopter service in 2026 to promote timely patrols and restoration efforts when Idaho Power determines appropriate based on considerations such as access or distance.

10.2.2. Fuels Reduction Shared Stewardship (Pilot)

Initiative Overview and Status: Since 2023, Idaho Power has participated in multiple partner-initiated fuels reduction projects that exhibit potential for reducing wildfire risk adjacent to Idaho Power rights-of-way 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 IDL, the U.S. Forest Service (USFS), the BLM, the National Forest Foundation, and local counties.

Additionally, Idaho Power serves on a cross-utility committee focused on sharing lessons learned and fostering innovative approaches for partner-driven fuels mitigation programs.

In 2026, Idaho Power plans to continue to seek out and engage in partner-initiated fuels reduction projects that exhibit meaningful potential for reducing wildfire risk adjacent to Idaho Power rights of way and wildfire risk zones, and any future WMPs will include any collaborative fuels reduction projects.



Figure 13
Salmon transmission line corridor pre-treatment (2025)

10.2.3. Line Monitoring Technology (Pilot)

Initiative Overview and Status: Idaho Power has begun a pilot project incorporating line monitors into its distribution system on selected circuits located within, or traversing through, wildfire risk zones. Line monitors are devices installed on overhead powerlines that use advanced sensing technologies that may help provide real-time data about the condition and performance of the electrical grid. The integration of line monitors with wildfire mitigation efforts may provide multiple benefits, including fault detection, historical perspective on fault locations, and transient capture capabilities.

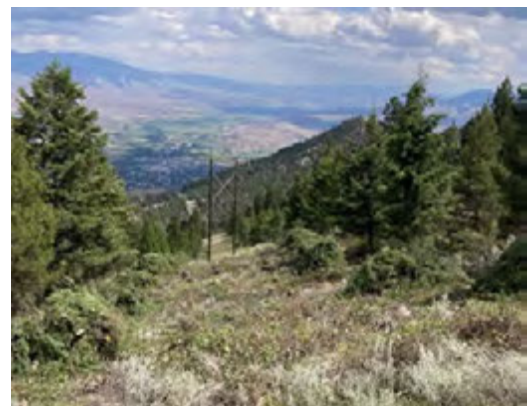


Figure 14
Salmon transmission line corridor post-treatment (2025).

To determine installation locations, Idaho Power evaluates candidate areas within wildfire risk zones where the circuit segment serves fire-prone terrain. Site selection is further guided by the availability of reliable cellular communications, which is essential for real-time data transmission. The company prioritizes feeder segments located outside substations and at locations along the line where, in Idaho Power's opinion, visibility into system behavior would provide potential operational benefit.

The company plans to install approximately 30 new communicating line monitors in Idaho in and around selected wildfire risk zones in 2026. Data will be collected and analyzed using advanced analytics in partnership with the equipment vendor. The goal of the pilot project is to determine effectiveness of the advanced line monitors in identifying potential arcing and early detection of failing devices.

10.2.4. Covered Conductor (Pilot)

Initiative Overview and Status: Idaho Power is piloting covered conductor as an additional alternative for wildfire risk reduction. 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. The insights gained are refining the company's designs, construction standards, and processes for broader implementation.

Idaho Power intends to continue the pilot project in 2026, targeting the installation of approximately one mile of a 34.5-kV distribution circuit. This phase of the pilot project will evaluate the feasibility of installing covered conductor at this higher distribution voltage, which requires more complex live-line construction methods, specifically, the exclusive use of hot sticks. Building on the lessons learned from phase one, this next phase will assess the tools, techniques, and overall viability of hot-stick installation.

10.2.5. 3-D Pole Loading (Pilot)

Initiative Overview and Status: As part of an ongoing pilot project, Idaho Power has contracted with a company who is using modeling software that creates 3-D representations of selected Idaho Power structures and surroundings in Tier 3 wildfire risk zones to improve understanding of potential loading constraints on equipment that could lead to a failure. This effort involves analyzing the structural integrity of utility poles to assess whether they can withstand various forces, such as wind, weight of equipment, and other environmental factors. These assessments help identify structural deficiencies based on pole class and the amount of equipment and joint use attachments installed.

The pilot project will be extended through 2026 to continue evaluating capabilities, refining methodologies, and gathering additional insights that may inform future asset management practices.

10.2.6. High Impedance Relay Protections (Pilot)

Initiative Overview and Status: Idaho Power is piloting high impedance fault locating in selected wildfire risk areas in collaboration with our recloser equipment vendor. This effort involves installing, configuring, and testing advanced and modified Form 7 recloser controls at five selected locations, each connected with wireless SCADA connectivity for remote monitoring. The goal of the pilot project is to develop a set

of advanced high impedance fault configuration parameters and sensing capabilities to successfully detect high impedance faults in the future while minimizing the false positive events prevalent in previous industry attempts to detect high impedance faults.

The company expects the pilot project to run over the next two years to continue evaluating, calibrating, and gathering event history and performance data to determine the viability of expanded implementation.

10.2.7. FAA Waivers and Aerial Drone Inspections (Pilot)

In 2025, the company secured two waivers: one authorizing patrolmen and drone pilots to hand-launch and operate drones beyond visual line of sight (BVLOS), and a second permitting remote operation of drones from locations separate from the inspection area.

In 2026, Idaho Power anticipates using these drone capabilities in transmission and distribution inspections in the following ways:

- Drones may be deployed at Idaho Power's discretion to support PSPS patrols in certain locations by performing aerial inspections of de-energized circuits prior to re-energization.
- Drones may be used at Idaho Power's discretion with outage response following operations of EPS, allowing patrolmen to quickly identify potential damage or issues requiring corrective action.
- Drones may be used for routine targeted asset inspections. In 2026, Idaho Power anticipates using drones to inspect approximately 10,000 poles in wildfire risk zones, with a target of up to 23%. Poles to be inspected by drone will be selected at Idaho Power's discretion.

These applications will be coordinated with existing inspection resources, including ground line, helicopter standby, and contracted aerial services.

Section

11

Public Outreach and Engagement



11. Public Outreach and Engagement

11.1. Objective

Communication is an important part of Idaho Power's wildfire mitigation efforts. Idaho Power engages in community outreach and public awareness efforts before, during, and after wildfire season to inform the public of wildfire risks and to notify the public of wildfire-related outages. Idaho Power communicates information about this WMP and wildfire risk in general to employees, customers, government officials, the public, and other stakeholders. The following objectives guide wildfire-related communications:

1. Educate customers about how to prepare for wildfire-related outages, including where to find outage and PSPS information and how to update contact information to enhance communication regarding any potential outage events.
2. Raise awareness about Idaho Power's wildfire mitigation work.
3. Explain how customers can reduce wildfire risk.

11.2. Community Engagement

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

Each year, Idaho Power organizes an education campaign focused on wildfire risk and outage preparedness. These campaigns promote the company's wildfire mitigation activities and customer outage communication, provide awareness and education on preparing for wildfire season, and publicize ways customers can prevent wildfires. The communication is intended to educate stakeholders, whether they reside in wildfire risk zones or not, about Idaho Power's wildfire mitigation efforts, including when Idaho Power may need to deploy a PSPS, and how stakeholders will be alerted during these events.

11.2.1. Public Safety Partners

Annually, before wildfire season, communications begin with public safety partners, including the State of Idaho ESF-12, county emergency managers, LEPCs, other public safety partners, local elected officials, and health and human service agencies. Through individual conversations, larger presentations, and public open-house events, Idaho Power provides an overview of its WMP and discusses outage preparedness, including how to prepare for a PSPS.

11.2.2. Critical Facilities

Idaho Power conducts focused engagement with critical facilities in areas where it has infrastructure and equipment. Critical facilities are those identified by Idaho Power and include, but are not limited to, hospitals, police and fire stations, wastewater treatment facilities, and telecommunication providers. During these interactions, Idaho Power works to update contact information and communication

preferences, provides an overview of the communication process during a PSPS, and shares outage preparedness tips.

11.2.3. Customers

Idaho Power’s customer-targeted outreach efforts include Idaho Power-hosted public meetings and open houses focused on outage preparedness, safety, and wildfire prevention, including PSPS. These efforts are complemented by participation in coordinated preparedness events led by community-based organizations, further strengthening local engagement. Outreach includes virtual meeting options in English and Spanish. Specific topics covered during these events include the following:

- Outage preparedness tips
- Idaho Power’s wildfire mitigation efforts
- Tools to prevent wildfires, including PSPS
- Options to help customers manage their accounts and stay informed, including Idaho Power’s app and outage alerts

Access and Functional Needs Customers

To ensure messaging reaches access and functional needs (AFN) customers, Idaho Power collaborates with community organizations focused on providing services and supplies to AFN individuals as a strategy to share outage preparedness information. The content includes considerations for older adults and individuals with disabilities and information about medical equipment considerations during an outage, emphasizing the importance of battery backups.

11.2.4. Lessons Learned from 2025 Community Engagement Efforts

In 2025, attendance at community engagements varied significantly, with an average of eight customers per event. Some of the Idaho Power-hosted open houses drew no participants. In contrast, participation in community-based organized events saw the highest turnout with customer counts at a handful of these events exceeding 300. Additionally, virtual meetings were offered in both English and Spanish. Recorded versions of the virtual meetings were also linked on Idaho Power’s website for customers to view at their convenience.

The company’s 2025 outreach efforts are summarized in Table 12.

Table 12

Idaho Power community engagement, 2025

Date	Details	Date	Details
March 29	Emmett, ID Preparedness Fair	May 6	Salmon, ID Open House
April 3	Horseshoe Bend, ID Open House	May 7	Virtual Meeting – English

Date	Details	Date	Details
April 8	Garden Valley, ID Open House	May 8	Virtual Meeting – Spanish
April 9	Gooding, ID Open House	May 13	American Falls, ID Open House
April 10	Burley, ID Open House	May 15	Blackfoot, ID Open House
April 23	Twin Falls, ID Open House	May 17	Boise, ID Preparedness Fair
April 24	Weiser, ID Open House	May 17	Pine, ID Presentation
April 26	Caldwell, ID Emergency Preparedness Fair	May 22	Council, ID Open House
April 28	Idaho City, ID Open House	May 27	Riggins, ID Open House
April 30	Fruitland, ID Open House	May 28	McCall, ID Open House
April 30	Hailey, ID Open House	May 29	Cascade, ID Open House
May 1	Fairfield, ID Presentation	May 29	Pocatello, ID Open House
May 6	Marsing, ID Open House	June 26	Virtual Meeting – Unique Medical or Mobility Needs

Idaho Power conducted two surveys to gather feedback and guide future community engagement strategies.

- The first survey was distributed to attendees of the Outage Preparedness Open-house events. The feedback from this survey, albeit with very limited participation, validated Idaho Power’s public open-house events with nearly all respondents rating the outage preparedness (92%) and wildfire prevention (96%) information as helpful.
- The second survey was distributed to a broad group of customers in July 2025 through Idaho Power’s Empowered Community participants, who have volunteered to regularly provide feedback to Idaho Power on a variety of topics. Insights from the Empowered Community survey revealed that a majority (62%) of customers prefer virtual events versus in-person events, when available.

As Idaho Power prepares for the 2026 wildfire season, the insights gathered from both surveys, along with other anecdotal feedback from customers, serve as a foundation for a strategic shift in outreach efforts. Rather than continuing the model of hosting in-person events in every Idaho county, Idaho Power will focus on delivering outage preparedness, wildfire mitigation, and PSPS education through a combination of virtual meetings and collaborative events with community-based organizations. This approach reflects customer preferences for more accessible formats and leverages partnerships that have consistently drawn higher participation. As highlighted above, 62% of customers favor virtual events when available, and 46% indicated they would be more likely to attend if Idaho Power partnered with other organizations—highlighting the value of flexibility and collaboration in future engagement strategies.



Figure 15
Public open house meetings throughout Idaho Power’s service area

11.3. Event-Specific Communication

During PSPS and wildfire events, Idaho Power uses 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.

11.4. Key Communication Methods

Idaho Power communicates with customers and the public through a variety of channels to help maximize reach and effectiveness:

- *Connections* (monthly newsletter to customers)
- Videos
- Email
- News media (news releases, appearances on broadcast TV and radio shows, interviews, etc.)
- Social media
- Printed materials, including flyers and bill inserts
- Idaho Power’s website: idahopower.com/wildfire
- Paid advertising (e.g., radio, digital)

At the end of each wildfire season, feedback from customer surveys and campaign metrics from paid media advertising help inform and refine the approach for the next year.

11.5. Timing of Outreach

Wildfire-related outreach occurs primarily before and during wildfire season. The timing of preseason wildfire outreach depends on weather conditions. Holding key communications until wildfire is more prominently on people’s minds increases the likelihood people will hear and retain the messages. Early communications encourage customers to think about wildfire season, how to prepare for outages,

their role in preventing wildfires, and steps Idaho Power is taking to mitigate wildfire risk. When the potential for wildfire increases, the tone and messaging shifts. Messaging urges customers to update their contact information, prepare for wildfire, and help prevent wildfires while recreating. After wildfire season and throughout the winter months, Idaho Power's wildfire-related outreach focuses on the ongoing efforts to reduce risk, including feeder hardening, vegetation management, and asset inspections. The messaging continues to offer tips for year-round outage preparedness.

11.6. Idaho Power Internal Communications — Employees

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

- *News Scans* (internal newsletter for all employees)
- Emails
- Leader communications
- GIS-based visual communication of risk zones and affected overhead lines
- Online training for employees about the WMP
- In-person, hands-on, training for certain field employees
- Mock events

Section

12

**Government,
Industry, and
Peer Utility
Outreach**



12. Government, Industry, and Peer Utility Outreach

12.1. Objective

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. Idaho Power engages in outreach efforts to coordinate with federal, state, tribal, and local officials and agencies on wildfire preparedness and emergency response plans.

Idaho Power recognizes the importance of engaging with various levels of government. Idaho Power also recognizes the importance of engagement and outreach with respect to potential future PSPS events to minimize customer impact. Peer utility engagement informs the company's efforts by learnings of its peers.

12.2. Government Engagement

Prior to the start of wildfire season, Idaho Power offers to meet with state and federal land-management agencies in Idaho and Montana to review the company's approach for wildfire mitigation and discuss wildfire season operations. Throughout the year, Idaho Power engages with federal, state, and county agencies to share information, receive feedback on mitigation approaches (including vegetation management practices), and to identify and work toward activities that are mutually beneficial and may be considered in subsequent WMPs. 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.³⁰ Throughout 2025, Idaho Power worked with state-level partners in support of certain recommendations. Idaho Power additionally participates in a Drought and Wildfire Technical Working Group (TWG) through the Idaho Office of Emergency Management (IOEM). The TWG is used to provide expertise and detail to help inform the State Hazard Mitigation Plan. Beyond the TWG, Idaho Power also engages with IOEM's area field officers, county emergency managers, LEPCs, local public safety partners, mayors, county commissioners, and other key local stakeholders.

In 2025, Idaho Power participated in a two-day wildfire summit in Helena, Montana, convened by Northwestern Energy. The focus of the summit was to bring together federal, state, and local agencies and organizations to discuss wildfire risk reduction goals and provide insight and perspectives on wildfire mitigation. Idaho Power presented on company learnings from the 2024 wildfire season at the forum.

Idaho Power engages with its regulators with respect to wildfire mitigation activities.

12.3. Peer Utility Engagement

Idaho Power's WMP is informed by peer benchmarking and utility wildfire-specific forums. Idaho Power engages with peer utilities from the Pacific Northwest, Rocky Mountain, and California regions, including but not limited to: Avista Utilities, Rocky Mountain Power, PGE, Pacific Power, Chelan County Public

³⁰ Wildfire Report Recommendations, August 2024. Available at: [IOEMADMINCOPIER-20240418092717](https://ioem.admncofier-20240418092717)

Utility District, Puget Sound Energy, Excel Energy, NV Energy, BPA, Northwestern Energy, San Diego Gas and Electric (SDG&E), Southern California Edison, Pacific Gas and Electric (PG&E), Sacramento Municipal Utility District (SMUD), and Liberty Electric.

Prior to the start of the 2025 Wildfire Season, Idaho Power hosted the Western Energy Institute's annual Wildfire Conference that brought together many of the utilities listed above for sharing of WMP best practices, common challenges, and innovative solutions for minimizing wildfire risk. In May of 2025, members of Idaho Power's Wildfire Mitigation team attended the second annual convening of PG&E's Near-Term, Risk Informed Wildfire Mitigation Strategies for Utilities conference. More than 150 attendees from utilities 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.

Additionally, Idaho Power is a member of trade-based organizations that offer wildfire-specific forums and discussions, including the IWRMC, Edison Electric Institute (EEI), and Western Energy Institute (WEI). These forums facilitate sharing of information. For example, the IWRMC was designed as an industry-sponsored collaborative forum that facilitates the sharing of wildfire risk mitigation insights and innovations from across the globe.

Idaho Power also participates in monthly workgroup forums through IWRMC 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. IWRMC 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.

Idaho Power's CEO and president is a member of the EEI Electricity Subsector Coordinating Council Wildfire Working Group. This working group has been coordinating with the U.S. Department of Energy (DOE) and other government agencies to collectively address wildfire threats and potential impacts.

Section

13

Performance Monitoring



13. Performance Monitoring

13.1. WMP Compliance

The company's Chief Operating Officer (COO) is the designated oversight officer for Idaho Power's WMP. The VP of Planning, Engineering & Construction is responsible for compliance monitoring, necessary training, and annual review of this WMP.

13.2. Annual Review and Compliance Reporting

Idaho Power conducts an annual review of its WMP and incorporates necessary updates based on the learnings of the most recent wildfire season. Compliance reports will be submitted to the IPUC on an annual basis, or on such other basis as the commission may prescribe.

13.3. 2025 Lessons Learned

13.3.1. Community Outreach and Engagement

Throughout 2025, Idaho Power experienced key learnings about community outreach efforts. Between March and June of 2025, Idaho Power hosted 26 in-person and online events intended to reach customers regarding outage preparedness, wildfire mitigation, and PSPS education. Attendance at community engagements varied significantly with an average of eight customers per event, though some Idaho Power-hosted open houses had no customers attend. In contrast, participation in community-based organized events saw the highest turnout, with customer counts exceeding 300. Idaho Power hosted two surveys in the past year that included questions about customer outreach preferences. Survey results indicated 62% of customers favored virtual events when available, and 46% indicated they would be more likely to attend if Idaho Power partnered with other organizations — highlighting the value of flexibility and collaboration in future engagement strategies. Idaho Power is building from these learnings to improve its overall approach for 2026, which is elaborated on in Section 11.2.

13.3.2. Fire Weather Station Network

Building on lessons learned during the 2024 wildfire season, Idaho Power installed 85 new fire weather stations in 2025 intended to enhance weather station coverage. Weather station coverage helps refine models, forecasts, and operational decision making around powerline safety. Idaho Power's efforts to improve the weather station network also provides benefit to public partners, including the National Weather Service.³¹ The company plans to continue this work throughout 2026. Section 4.5 of the WMP elaborates on Idaho Power's weather station efforts.

³¹ Social Media Video on Idaho Power Fire Weather Station Efforts: facebook.com/watch/?v=1469080987564737

13.3.3. Aerial Inspections

In 2025, the company launched its first-year aerial inspections pilot project using unmanned aerial systems (UAS) to inspect distribution assets. The company completed 5,953 inspections of distribution poles in wildfire risk zones, exceeding the 5,000-pole target for the year. The pilot project used contractors for image collection, desktop inspections, and independent quality-assurance checks, with confirmed issues routed for correction. A key lesson learned is that developing internal data storage systems for drone imagery will enhance the usability of data.

Building on these results, in 2026, the company will evaluate an enterprise imagery application with a focus on future integrations to geographic information systems (GIS) or other internal systems to broaden business use of the images. The pilot project also showed that aerial inspections provide a complementary vantage point to traditional ground patrols. Based on these lessons, Idaho Power's intended use of drones in 2026 is described above in Section 10.2.7.

13.3.4. PSPS Event Management Tools and Processes

In 2025, the company began developing an Event Management Software (EMS) to support PSPS execution. This effort included refreshed customer communications (e.g., text-to-voice with do-not-disturb, updated templates and cause codes, and aligned estimated time of restoration). The project also resulted in outage-map improvements, new critical-facility outreach workflows, and a dashboard reporting tool that will be used in 2026.

As the company made improvements throughout the year, progress showed that centralizing PSPS data, decisions, and messaging can help improve operational consistency. In 2026, the Company will continue maturing event management capabilities and customer communications, focusing on exploring training and technology.

Section

14

**WMP
Cost
Summary**



14. WMP Cost Summary

In 2026, Idaho Power estimates investing \$53 million in operations and maintenance (O&M) expenses in Idaho to further wildfire mitigation measures. Table 13 summarizes the company's planned O&M expenditures associated with executing its 2026 Idaho and Montana WMP. Estimated amounts reflect the company's best estimates and plans as of October 2025. These estimates will likely change in the future as the company reviews and refines its WMP and associated mitigation activities.

Idaho Power's wildfire mitigation efforts also include capital investments in system infrastructure, many of which also provide co-benefits to the company, such as increased safety, reliability, and resiliency of the system as identified in Section 3.4 (Table 3). Capital investment programs are summarized in Table 14.

Table 13

Estimated O&M expenses for wildfire mitigation, \$000s (2026)*

Wildfire Mitigation Program Description	2026 Forecast
A. Geographical Risk Assessment	
Risk Modeling - Risk Maps, Fire Simulation, Probabilistic Model Development and Support	\$2,236
B. Situational Awareness and Monitoring	
Weather Forecasting - System development and support, data services, climatology	\$72
Weather Forecasting Personnel - FPI and PSPS	\$202
Weather Forecasting - Weather Station Maintenance	\$234
Pole Loading Modeling & Assessment (Contract service)	\$72
Wildfire Detection Cameras	\$254
C. Workforce Preparedness	
Tools/Equipment	\$34
International Wildfire Risk Mitigation Consortium	\$38
D. Infrastructure Inspection and Asset Management	
O&M Component of Capital Work	\$391
Annual O&M T&D Patrol Maintenance Repairs	\$187
Transmission Thermography Inspection Mitigation	\$48
Distribution Thermography Inspection Mitigation	\$48
Thermography Technician Personnel	\$165
Transmission Wood Pole Fire Resistant Wraps	\$250
Wildfire Mitigation Program Labor	\$1,194
Patrolmen for Wildfire Pre-Season Inspections in Wildfire Risk Zones	\$157
Covered Wire Evaluation - Pilot Program in PSPS Zones	\$14
Drone Beyond Visual Line of Sight Waiver for PSPS Patrols	\$0
Aerial Drone Inspection Pilot	\$675

Wildfire Mitigation Program Description	2026 Forecast
E. Vegetation Management	
Transition to/Maintain 3-year Vegetation Management Cycle (includes Enhanced Practices for Distribution Tier 3 & Tier 2 Risk Zones)	\$45,282
Internal Tree Trimming Crew	\$381
Line Clearing Personnel	\$198
Fuel Reduction Program	\$72
F. Public Outreach and Engagement	
Wildfire/Wildfire Mitigation Education/Communication - Advertisements, Bill Inserts, Meetings, Other & PSPS Customer Education/Communication - Advertisements, Bill Inserts, Other	\$164
Public meetings/event fees for PSPS engagement, maps, flyers	\$8
Community and Customer Engagement and Outreach	\$160
G. Line Operations Practices PSPS/Emergency Preparedness and Technology	
Communication/Alert Tool development (System set up, outage maps, critical facilities identification)	\$0
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$215
Fire Suppression Resources	\$183
Standby Helicopter Service	\$536
Community Resource Centers	\$5
Total	\$53,473

*As of October 1, 2025. These are best-known estimates at the time of this WMP's filing and are subject to change. These numbers are provided only for the purpose of review and approval of this WMP pursuant to the WSCA. They should not be used for any other purpose.

Table 14
2026 WMP forecasted capital investments, \$000s (\$)*

Mitigation Program	Program Description	2026 Planned in Service
Overhead Primary Hardening Program	Replacement and upgrades of hardware and equipment	\$19,500
Strategic Undergrounding	Select conversion of overhead to underground distribution in Tier 3 Risk Zones	\$12,000
Recloser Segmentation and Communication Upgrades	Installation, relocation, and expanded communication for automatic reclosing overcurrent protection devices	\$200
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	\$50
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	\$1,223

*These are estimates only. The costs may increase or decrease due to such factors as inflation or scope changes. These numbers are provided only for the purpose of review and approval of this WMP pursuant to the WSCA. They should not be used for any other purpose.

Appendix A: Wildland Fire Preparedness and Prevention Plan

October 2025

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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 for applicable IPC employees be aware of the provisions of this Plan and operate in accordance with the Plan.

B. Scope of Plan

The scope of this Plan extends to tools, equipment, and field behaviors IPC employees incorporate when working in locations and under conditions where there is a heightened risk of wildfire. Other fire mitigation activities, such as 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 (WMP).

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). Montana's wildfire season is defined by Montana Code § 76-13-102 as the period of each year beginning May 1 and ending September 30. 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, IDL, etc.) issue any wildfire related order that extends wildfire season beyond that specified above, that agency's order shall govern.

Many variables—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 WMP includes a Wildfire Risk Map of areas where IPC has infrastructure or equipment. 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 lesser 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 WRZs.

C. Fire Potential Index

IPC's Atmospheric Sciences department has developed a Fire Potential Index (FPI) rating system that forecasts wildfire potential in WRZs. The FPI consists of a numerical score ranging from 1 to 16. The FPI scores are grouped into the following three index levels:

1. **Green:** FPI score of 1 through 11
2. **Yellow:** FPI score of 12 through 14
3. **Red:** FPI score of 15 through 16

During wildfire season, IPC will determine a daily FPI as described in Section 4.2 of the WMP for each of IPC's WRZs. The FPI information is contained within IPC GIS viewers available to applicable 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. The following process steps shall apply to Idaho Power employees contemplating field work during wildfire season.

Planned or Scheduled Work Activities

1. Employees working in the field in a WRZ and not working on transmission or primary distribution lines should:
 - 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.
 - 1.2. Once the FPI level for the work zone is identified, proceed with work but consider using Prevention—Practices of Field Personnel (see Section 4 of this Plan).
2. Employees working in the field in a WRZ and working on transmission or primary distribution lines should:
 - 2.1. Be aware of the current and forecasted weather and the FPI level for the area where the work will be performed.
 - 2.2. Once the FPI level for the WRZ is identified, proceed as follows for each FPI level:

- 2.2.1. **Green FPI** in All Zones: Proceed with the work. Evaluate need for using Prevention—Practices of Field Personnel (see Section 4 of this Plan).
- 2.2.2. **Yellow FPI** in All Zones: Proceed with the work. Evaluate need for using Prevention—Practices of Field Personnel (see Section 4 of this plan).
- 2.2.3. **Red FPI**
- **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).
 - **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).

		Tier 2	Tier 3
Fire Potential Index (FPI)	Higher 15–16 (Red)	Proceed with Work Use Prevention—Practices of Field Personnel REQUIRED	STOP/NO WORK
	Elevated 12–14 (Yellow)	Proceed with Work Use Prevention—Practices of Field Personnel (evaluate conditions and use as needed)	Proceed with Work Use Prevention—Practices of Field Personnel (evaluate conditions and use as needed)
	Normal 1–11 (Green)	Proceed with Work Use Prevention—Practices of Field Personnel (evaluate conditions and use as needed)	Proceed with Work Use Prevention—Practices of Field Personnel (evaluate conditions and use as needed)

3. Land Management Agency Restrictions

- 3.1. Follow the requirements and restrictions of any wildfire restrictions-related order issued by local, state, or federal land management agencies.
- 3.2. As soon as reasonably practicable, upon receiving knowledge of an order, the Environmental Affairs 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 work will be undertaken at Idaho Power's discretion 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 Standards*.

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
- Long sleeve flame-resistant (FR) shirt and FR pants
- Leather gloves
- Exterior leather work boots, 8-inch 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 Standards* and Fleet Services.

Employees working on transmission or distribution lines in situations governed by the wildfire prevention provisions of the March 2019 Master Agreement between IPC and the State of Idaho BLM or in any WRZ in Idaho, Nevada, Montana, and Oregon:

- During wildfire season or during any other wildfire season ordered by a local, state, or federal jurisdiction, IPC 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 (30–200 gallons) with a mechanism to effectively spray water, sufficient for initial attack (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 Pulaski available 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 (e.g., backpack pumps, water sprayer). 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.

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 if the situation warrants such action. In the event of a fire ignition, IPC personnel present at the time of the ignition will take action consistent with that person's training and experience to control the fire ignition while still accounting for their own personal safety; however, Idaho Power is generally not responsible for fighting fires. This responsibility remains with federal, state, and local firefighting organizations.

C. Land Management Agency Restrictions and Waivers

The Environmental Affairs department will strive to 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 Affairs 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 one hour following the cessation of that activity. Also, IPC personnel will not smoke unless within an enclosed vehicle, building, 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.

4. Prevention—Practices of Field Personnel

A. General Employee Practices

The following listing identifies practices and behaviors employees shall incorporate during fire season.

1. Daily tailboards must include discussion around fire mitigation planning. Discussion topics may include, but are not limited to, the following:
 - 1.1. Items 2 through 7 below
 - 1.2. Water suppression
 - 1.3. Hand tools
 - 1.4. Welding blankets
 - 1.5. Mowing high brush areas (weed wacker)
 - 1.6. 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 may include, but are not limited to, the following:
 - 2.1. Identify the FPI for the area being worked if in a WRZ (see Section 4.2 of the WMP).
 - 2.1.1. Monitor weather forecasts, and wind and humidity conditions.
 - 2.1.2. Identify surroundings (i.e., wildland-urban interface, BLM lands, Forest Service lands, proximity to any homes and structures, etc.).
 - 2.1.3. Identify local fire departments and locations.
 - 2.1.4. Evaluate the terrain you are working in (steep or flat).
 - 2.1.5. 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 may include, but are not limited to, the following:
 - 3.1. Performing energized work

- 3.2. Grinding or welding
- 3.3. Trees contacting electrical conductors
- 3.4. Hot saws
- 3.5. Chainsaws
- 3.6. Weed whackers
- 3.7. Sawzalls
4. Monitoring the worksite throughout the project.
 - 4.1. All crews and equipment working in a WRZ will monitor and inspect 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.
 - 5.1. If employees bring food to a worksite 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:
 - 5.1.1. The stove or grill must be in good repair and of sturdy construction.
 - 5.1.2. Stoves must be kept clean; grease build up is not allowed.
 - 5.1.3. Fueling of the stove must follow the fueling procedures when liquid fuels are used.
 - 5.1.4. Cooking must be in areas free of combustible materials.
6. Smoking on the job site.
 - 6.1. The following practices shall be followed:
 - 6.1.1. Do not discard any tobacco products from a moving vehicle.
 - 6.1.2. 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.
 - 7.1. Conduct a final inspection or post-check the work site for any ignition hazards that may remain.

B. Behaviors Relating to Vehicles and Combustion Engine Power Tools

Employees should follow the vehicle-related processes set out below when working in WRZ during fire season. Leadership should consider scheduling off-road equipment use in WRZ during fire season for times of green-level FPI.

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:
 - 2.1. Inspect 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.
 - 2.1.1. 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.
 - 2.1.2. Vehicles shall be parked overnight in areas free from flammable vegetation at a minimum distance of 10 feet.
 - 2.1.3. 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.
 - 2.1.4. 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.
 - 2.1.5. 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:

3.1. Park vehicles in areas free of combustible materials.

3.1.1. 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:

4.1. Tools or equipment should NOT be fueled while running.

4.1.1. Allow a cool-down period to give equipment time to no longer be considered a fire risk.

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

4.1.3. Clear any combustible debris from the immediate area.

4.1.4. Never smoke while fueling.

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

5. Combustion engine power tools:

5.1. 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 whacker
- Brush hog

6. 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 reported to IPC regional or system dispatch as soon as practicable. All work shall immediately stop, and reasonably prudent steps taken to extinguish the fire with available tools, water, and equipment considering the individual's training and experience, subject to the safety of personnel. 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 IPC 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 WRZs 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 in to 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. 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.
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.
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

Before the start of wildfire season (May 10), all vehicles associated with work on transmission and distribution lines will be informally audited by leadership to ensure those required to carry certain equipment pursuant to this Plan 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. 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.
- A supply of water, sufficient for initial attack, with an effective spraying mechanism (i.e., backpack pumps, water sprayer, etc.).
- A 30- to 200-gallon mechanical fire pumper.

Individual Truck

Each truck will be equipped with the following:

- 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 and FR pants
- Leather gloves
- Exterior leather work boots 8-inch-high lace type with Vibram type soles
- Fire shelter

Appendix B: Wildfire Public Safety Power Shutoff Plan

October 2025

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1. Public Safety Power Shutoff Overview

A Public Safety Power Shutoff (PSPS) is among the wildfire mitigation practices described in Idaho Power's Wildfire Mitigation Plan (WMP). Idaho Power may conduct a PSPS for electrical facilities located within wildfire risk zones if considered appropriate by Idaho Power. PSPS allows for proactive de-energization of targeted electrical facilities located within wildfire risk zones during extreme weather to reduce wildfire risk.

Idaho Power developed this Public Safety Power Shutoff Plan (PSPS Plan or Plan) to guide its use of PSPS. The Plan includes implementation considerations, de-energization criteria, and the associated community and customer communications protocols. Given the inherently disruptive nature of power outages, PSPS events are evaluated to balance wildfire risk with potential PSPS impacts on Idaho Power customers and the communities the company serves. Idaho Power will only consider performing PSPS events within wildfire risks zones.

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. 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.

Idaho Power only considers implementation of PSPS during wildfire season. Outside of wildfire season, Idaho Power is not required to consider PSPS events; therefore, this Plan is inactive. This Plan is reviewed and updated annually, as necessary.

2. Definitions

Critical Facilities—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.

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

Exercise—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.

Community—A group of people who share goals, values, and institutions.²

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 \(fema.gov\)](#).

Local Emergency Manager—A person assigned a role in a jurisdiction that oversees the day-to-day emergency management programs and activities.³

Public Safety Partners—ESF-12, local emergency management, and other agencies as applicable.

3. PSPS Implementation Considerations

Idaho Power will initiate the process that may ultimately result in a PSPS if the company determines a combination of critical conditions exist that indicate potential significant wildfire risk associated with Idaho Power's transmission and distribution (T&D) facilities in a wildfire risk zone 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 this section in deciding whether to initiate the process that may ultimately result in a PSPS. The following subsections list the varying data sources Idaho Power may consider in deciding whether to initiate the PSPS process.

3.1. Fire Potential Index

Idaho Power forecasts wildfire potential in each of Idaho Power's wildfire risk zones during wildfire season using a tool described as a Fire Potential Index (FPI), described further in Section 4.2 of the WMP. This tool is designed to support operational decision-making during fire season. The FPI converts environmental, statistical, and scientific data into a numeric forecast of the short-term fire threat. As described in Section 4.2 of the WMP, a FPI score of 15 or 16 is classified Red and is considered to indicate higher potential for a large fire to develop and spread. Idaho Power will consider whether the FPI is Red in determining whether to initiate the PSPS process.

3.2. 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](#).⁴ RFWs are monitored and factored into Idaho Power's determination of whether to initiate the PSPS process.

In rare instances, the NWS may issue a Red Flag Warning Particularly Dangerous Situation (PDS). The PDS designation is reserved for the most critical fire weather conditions, when forecasters have high confidence that a combination of very strong winds, extremely low

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

⁴ National Weather Service, Fire Weather, Idaho, <https://www.weather.gov/wrh/fire?wfo=boi>.

humidity, and dry fuels will result in rapid ignition and uncontrollable fire spread. Idaho Power is more likely to initiate the PSPS process if an RFW PDS has been issued for an area in which a wildfire risk zone is located; however, a RFW PDS does not, alone, dictate that Idaho Power must initiate the PSPS process.

3.3. 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 an NWS blend of models, European Centre for Medium-Range Weather Forecasts (ECMWF), United Kingdom Meteorological Office weather service information, and Geostationary Operational Environmental Satellite (GOES) 16 satellite information.
- **Graphical Weather Link** (graphical.weather.gov/sectors/conusFireWeek.php): A 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.

3.4. 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/.

3.5. 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.

3.6. Current Weather Observations

Monitoring real-time weather conditions assists in 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 fire weather stations as well as Remote Automatic Weather Stations, [Windy: Wind Map and Weather Forecast](#)⁵, and

⁵ Windy.com, windy.com/?43.635,-116.202,5

the NWS National Oceanic and Atmospheric Administration's (NOAA) [Weather and Hazards Viewer](#).⁶

Additionally, Idaho Power's PSPS program includes employees acting as field observers to report on site conditions. Idaho Power typically deploys trained field observers to strategic locations to provide real-time weather observations and circuit conditions before a weather system is forecasted to arrive at wildfire risk zone. Field observations include—without limitation—conditional assessments of system impacts from wind and vegetation, flying debris, and conductor impact.

Field observers are equipped with mobile weather kits that include wind meters, compasses, and satellite communication devices to report real-time conditions. Information is communicated to the PSPS Assessment Team for consideration during a PSPS event.

Idaho Power's deployment of field observers is addressed in Section 5.2. Due to the speed at which weather events can occur and the potential extent of areas in scope, Idaho Power may not deploy field observers in every event, or to every in-scope area during an event.

3.7. 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.

3.8. 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 condition information that helps Idaho Power understand wildfire potential in the service area.

3.9. Fire Agency Input

Idaho Power listens to update briefings provided by Boise NWS fire forecasters and National Interagency Fire Center (NIFC) Predictive Service forecasters as needed, generally regarding data clarification, to streamline the transfer of data, information, and communications about wildland fires that may impact wildfire risk zones.

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

⁶ NOAA, Weather and Hazards Viewer, wrh.noaa.gov/map/?obs=true&wfo=boi

3.10. De-Energization Windspeed Considerations

The environmental conditions in the areas where Idaho Power may consider initiating PSPS vary drastically from high desert landscape to mountainous terrain. Weather and environmental conditions also vary greatly within this area and can change in minutes. 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 continues to refine.

3.11. Alternative Protective Measures

Considering the potential impact of a PSPS to customers, prior to implementing a PSPS, Idaho Power 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. The availability of alternative protective measures may cause Idaho Power to decide that PSPS is not warranted.

4. De-Energization Criteria

Due to the dynamic and complex nature of wildfire and weather behavior, PSPS decisions are made in real time using the best available information from meteorological forecasts, field intelligence, and system conditions. Idaho Power prioritizes a risk-informed approach that balances wildfire prevention with the need to maintain electric service for safety, emergency communications, and essential services.

Idaho Power’s decision to de-energize will be based on the totality of the circumstances and thus is not reducible to a formula or definitive triggers. It will involve an evaluation of multiple risk variables, including wind speed, relative humidity, fuel moisture, and infrastructure type.

Idaho Power’s approach, due to the inherent risks and downsides with proactive de-energization, is to employ de-energization only as a tool of last resort. It is thus Idaho Power’s policy in this WMP, subject to situation-by-situation assessments of all relevant factors as described above, to employ PSPS de-energization for distribution or transmission lines, or the segments thereof to the nearest zone of protection segmentation point or end of the line if none exists, within designated wildfire risk zones if both (1) a fire potential element and (2) a windspeed element are met for a given wildfire risk zone:

The fire potential element is met for a wildfire risk zone if

- There is an FPI of 15 or higher for that wildfire risk zone for the time period when the windspeed element is met and
- the National Weather Service has issued either a Red Flag Warning Particularly Dangerous Situation (PDS) for a location(s) within that wildfire risk zone during the time that the windspeed element is met or a High Wind Warning (defined as sustained winds of 40 mph or higher for at least one hour or more and/or gusts of 58 mph or higher) for that area.

The windspeed element is met if:

- **Distribution Circuits:** Idaho Power identifies observed winds exceeding 30 mph sustained for at least one hour combined with wind gusts exceeding thresholds derived from historical climatology stated in the *2026 Operational Wind Speed Guidelines for EPS and PSPS by Risk Zone* for the applicable wildfire risk zone location.
- **Transmission Circuits:** Idaho Power identifies observed winds exceeding 40 mph sustained for at least one hour and observed or known wind gusts exceeding 70 mph for the wildfire risk zone location. Idaho Power may opt not to de-energize a transmission segment or circuit if it determines the requested de-energization may cause grid instability or reliability issues that could impact a large number of customers (such as a de-energization that could impact 1,000 or more customers) or impact the bulk electric system, or if Idaho Power believes it poses a risk to public safety.

Consistent with Idaho Power's case-by-case evaluation of all relevant factors, even when extreme fire weather is forecasted, a risk evaluation may support maintaining power if other mitigation measures are in place, such as Enhanced Protection Settings or hardened infrastructure that lowers the likelihood of ignition.

5. PSPS Operations and Communication Phases

Although the extent of the areas where Idaho Power has infrastructure and equipment, the geographic and environmental diversity of those locations, and unpredictable nature of weather make it challenging, Idaho Power is committed to providing as much advance notice as reasonably possible in preparation for a PSPS event.

5.1. Phase 1 and Incident Team Activation

Once the criteria are met to initiate the process for a potential PSPS event, an internal incident command team (IC team) will discuss the timing and impact of the event and make recommendations pertaining to the issuance of preliminary notifications of a potential PSPS event to customers, public safety partners, utility defined critical facilities operators, and/or the ESF-12.

The intent of any initial communication is to allow public safety partners and critical facilities to begin preparing for the PSPS event, which may include identification of back-up generation, community resource centers, or heightened response for vulnerable populations. This step also allows for coordinated communications with public safety partners, if deemed necessary by Idaho Power.

These notifications may include emails, text messages, and/or phone calls. The mode of communication is based on the preference of each audience as communicated to Idaho Power.

The Idaho Power IC team will continue meeting and providing updated community and customer communications throughout a PSPS event, if feasible. This could include cancellation of the event or restoration of the de-energized PSPS circuits and any related storm activity.

Throughout an event, there may be requests to delay proactive de-energization from the public safety partners or ESF-12. This may occur for several reasons, such as the potential impact to a customer's or fire response agency's ability to pump water for fire suppression during the outage. Delay requests will be communicated to the IC team for consideration.

5.2. 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 discuss timing of proactive customer communications.

During Phase 2, field observers, described in Section 3.6, may 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 to inform PSPS de-energization decisions. As stated above, Idaho Power does not guarantee that field observers will be dispatched to all wildfire risk zones under consideration for PSPS in all events.

Idaho Power will strive to provide proactive customer communication as the likelihood of the PSPS event increases. This may occur several hours or more after the initial public safety partner and critical facility communication. As reference, Idaho Power strives to follow the communication timelines set in relevant state regulations, noting the timing of all proactive communications is tied to the development of weather conditions and therefore subject to change.

5.3. Phase 3: De-Energization

After the determination to proactively de-energize is made, the assigned representative of the IC team will inform Idaho Power's Dispatch Operations to confirm the PSPS de-energization. The criteria for de-energization are discussed in Section 4.

Idaho Power will continue providing community updates as it deems appropriate. Customer communications may include email, text, and/or phone messages. The outage notification will include the reason for the de-energization and where to find real-time updates on outage status.

5.4. Phase 4: Re-Energization

5.4.1. System Inspections

If electrical facilities are de-energized for PSPS, Idaho Power follows a process to restore service. When conditions are safe, de-energized T&D circuits and other potentially impacted facilities are patrolled to confirm readiness for re-energization. Repairs may be completed as necessary, and restoration is carried out in a controlled manner. Each operating region

identifies the resources and procedures to be used during PSPS events, helping restoration to occur safely, efficiently, and in coordination with the dispatch manager.

5.4.2. Repair and Recovery

Line crews will repair impacted facilities based on internal priority coordination, replacing damaged equipment, and performing other actions to support safe re-energization of the affected portion of the T&D system.

5.4.3. Communicate PSPS Event Conclusion

Idaho Power will strive to provide customers with estimated restoration times until any storm or PSPS 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 may also leverage existing public agency outreach and notification systems as done at other points in the PSPS process.

6. Post-incident Review

Following the conclusion of a PSPS event, Idaho Power will conduct informal, high-level debriefs to identify potential modifications to PSPS protocol based on lessons learned during the event. An assigned representative will consolidate the feedback and file as part of the incident documentation.

7. Exercises

Idaho Power will exercise this PSPS Plan on an annual basis prior to wildfire season using one or more different scenarios and testing one or more portions of the Plan. These exercises may include any of the following:

- 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.
- Discussing and/or developing re-energization plans.
- Testing capacity limits on incoming and outgoing communications systems.

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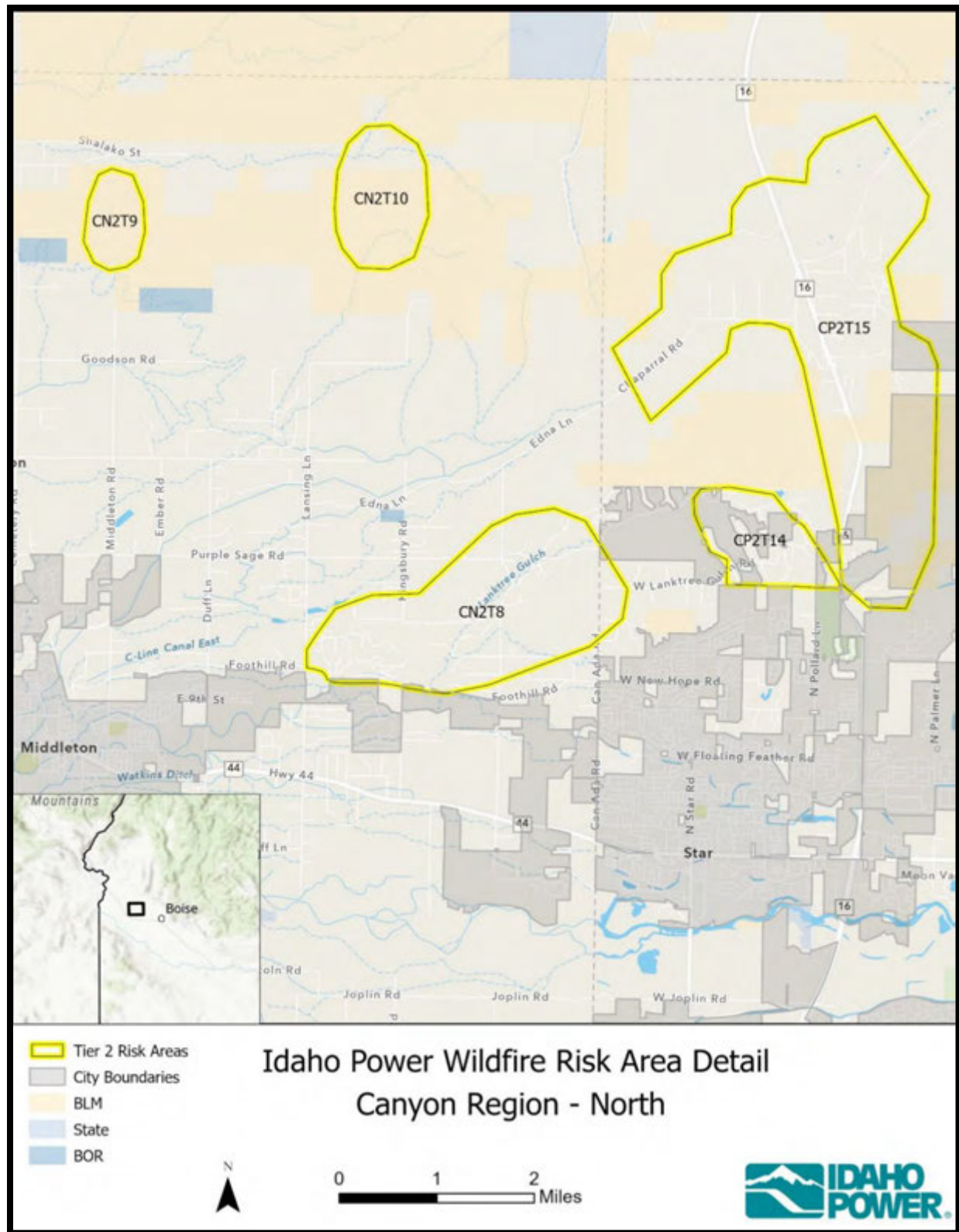


Figure 1
Canyon Region—North

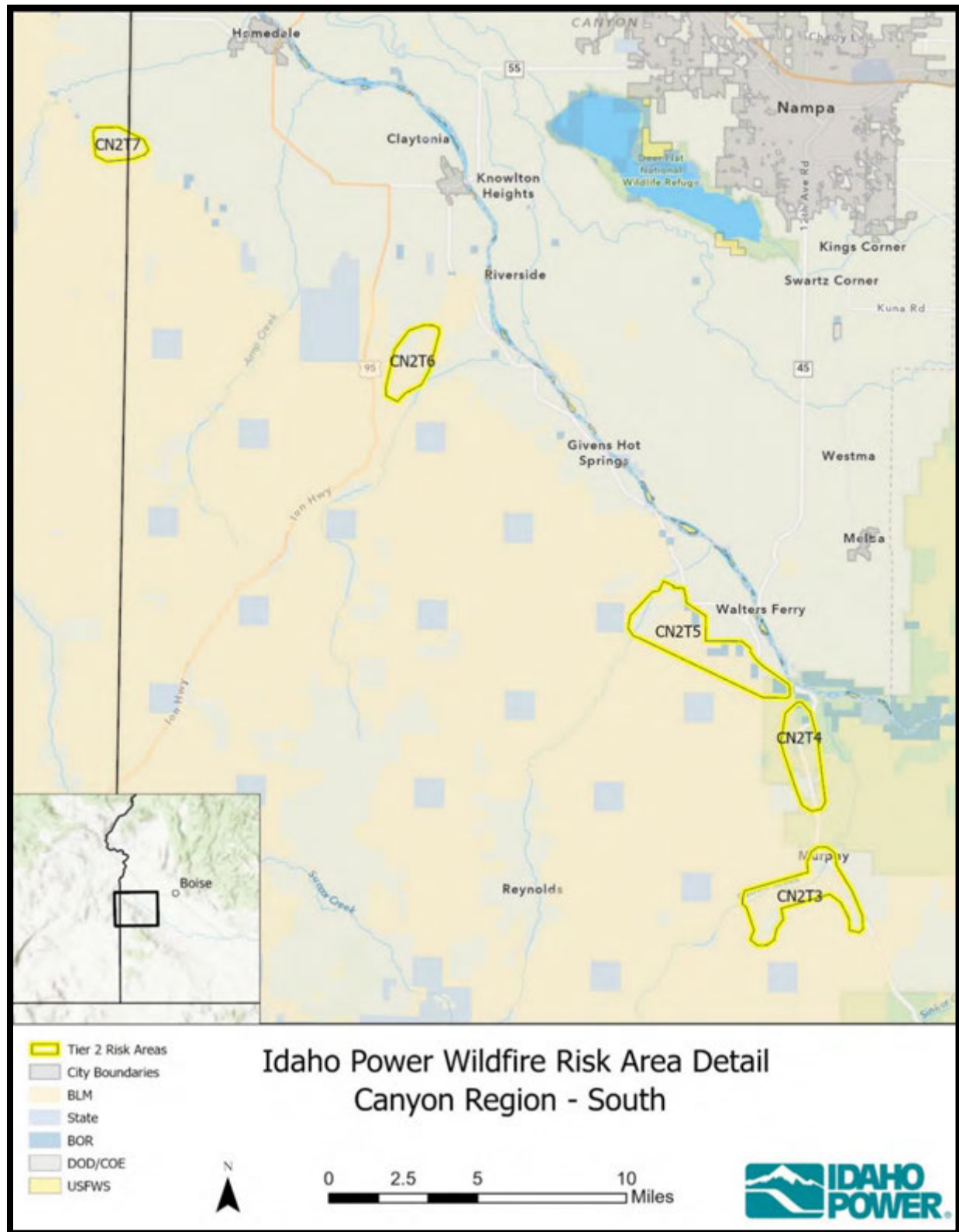


Figure 2
Canyon Region—South

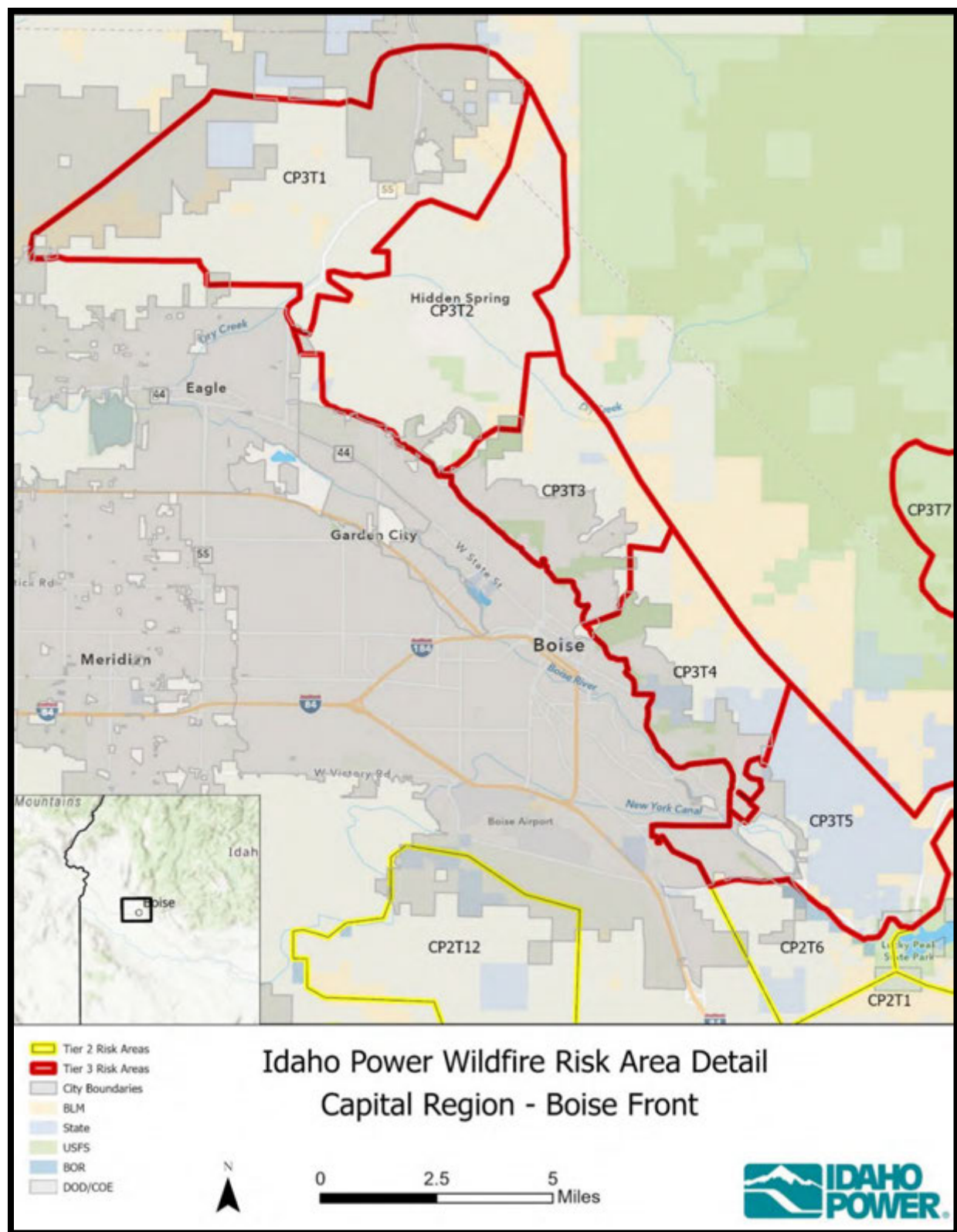


Figure 3
Capital Region—Boise Front

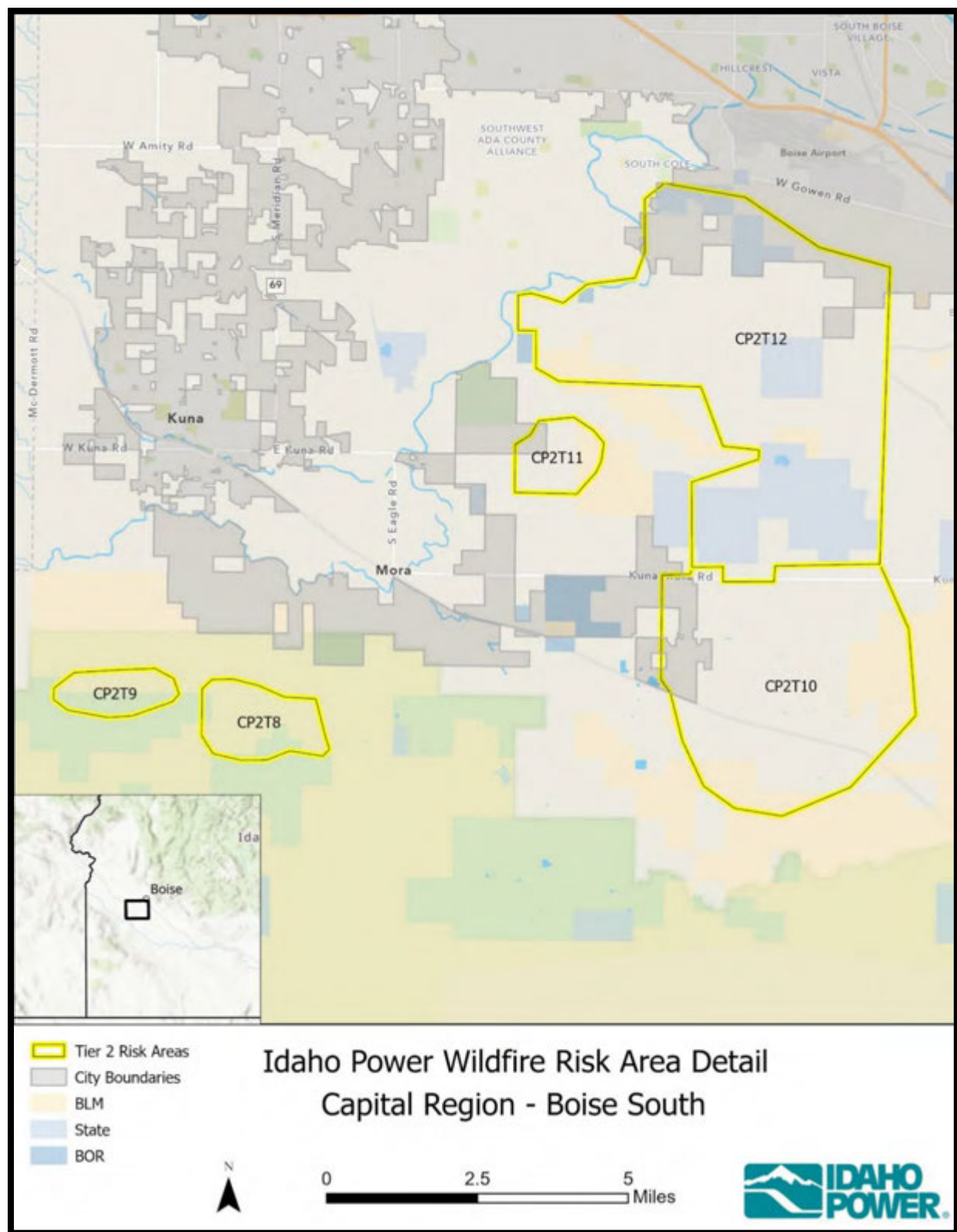


Figure 4
Capital Region—Boise South

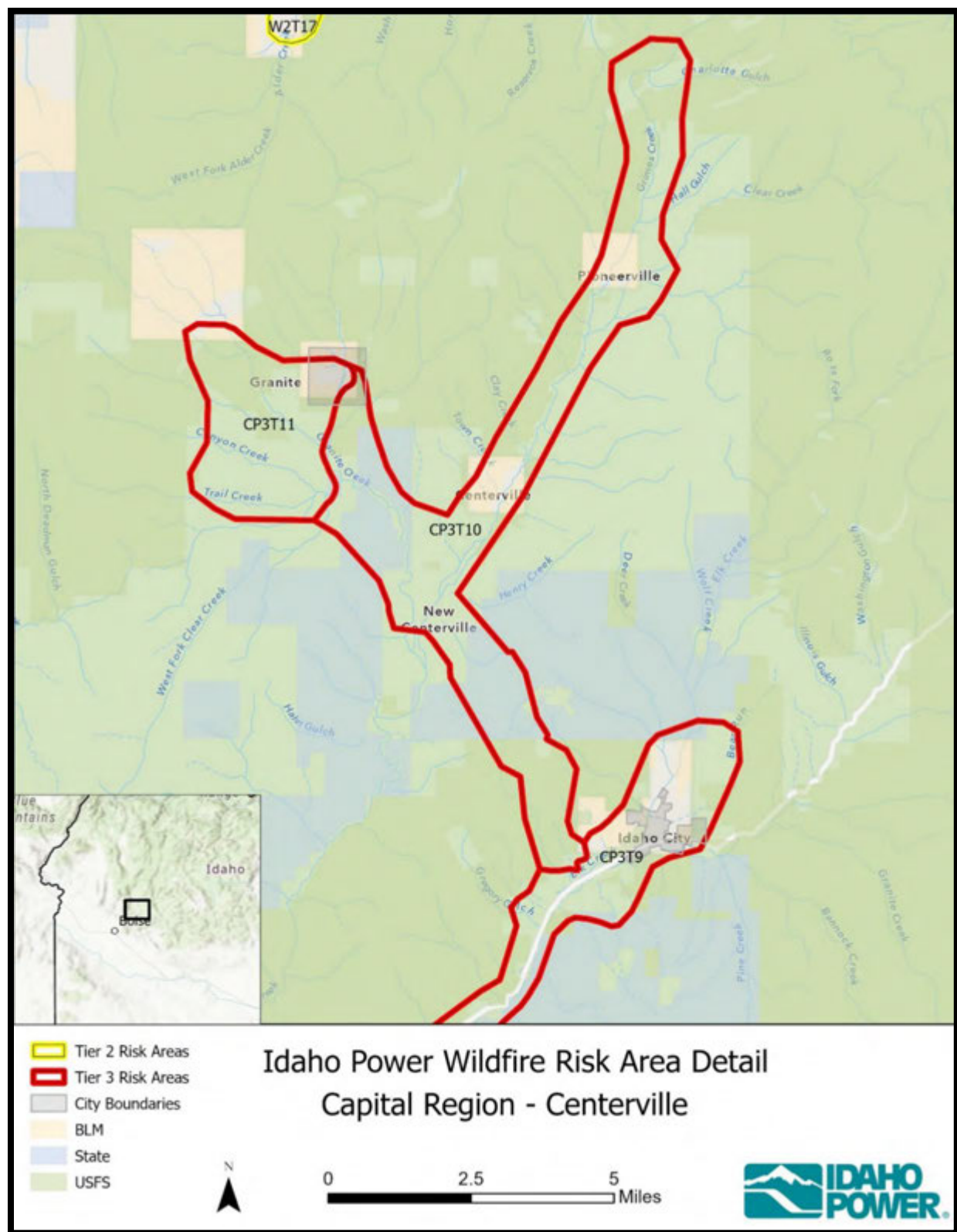


Figure 5
Capital Region—Centerville

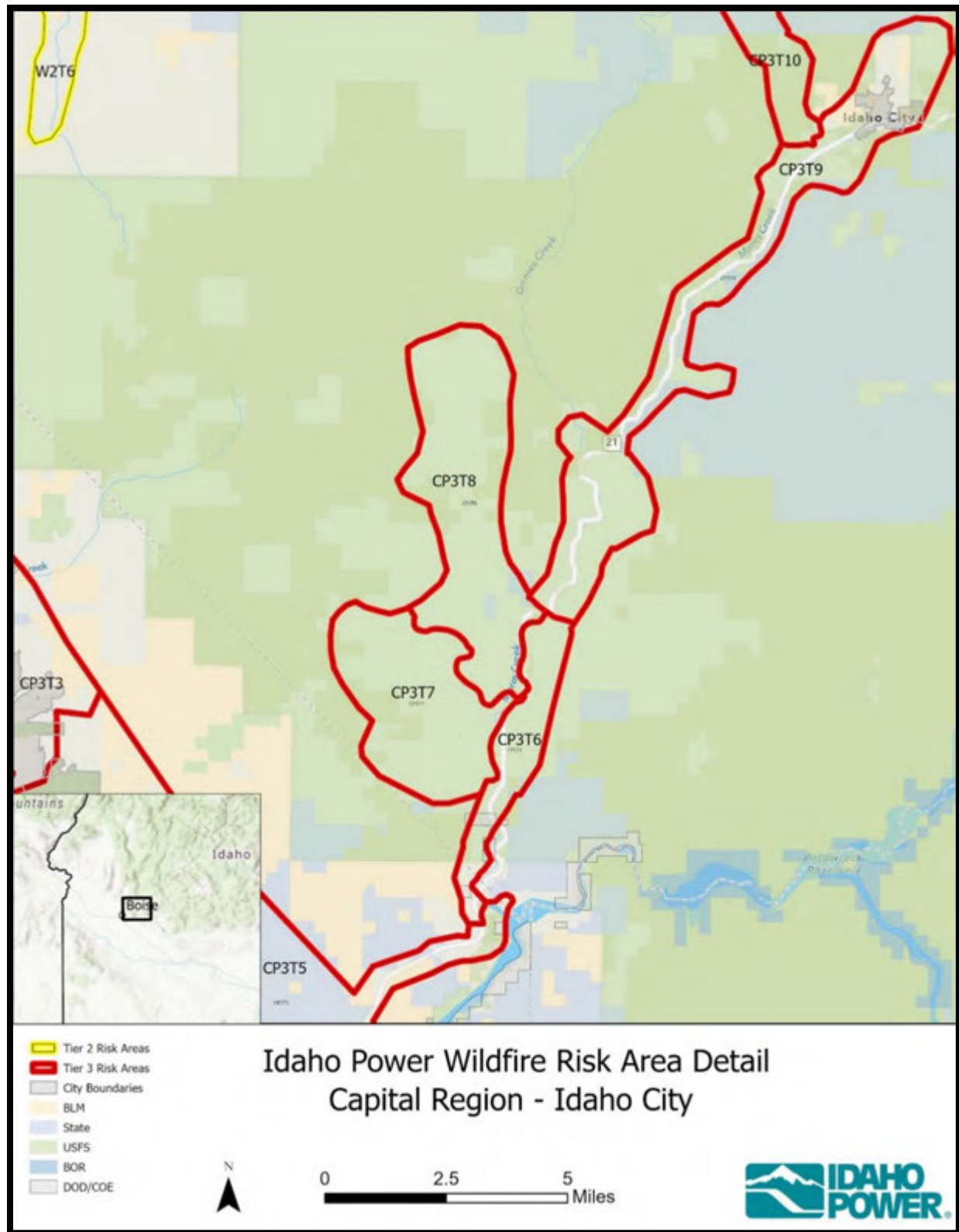


Figure 6
Capital Region—Idaho City

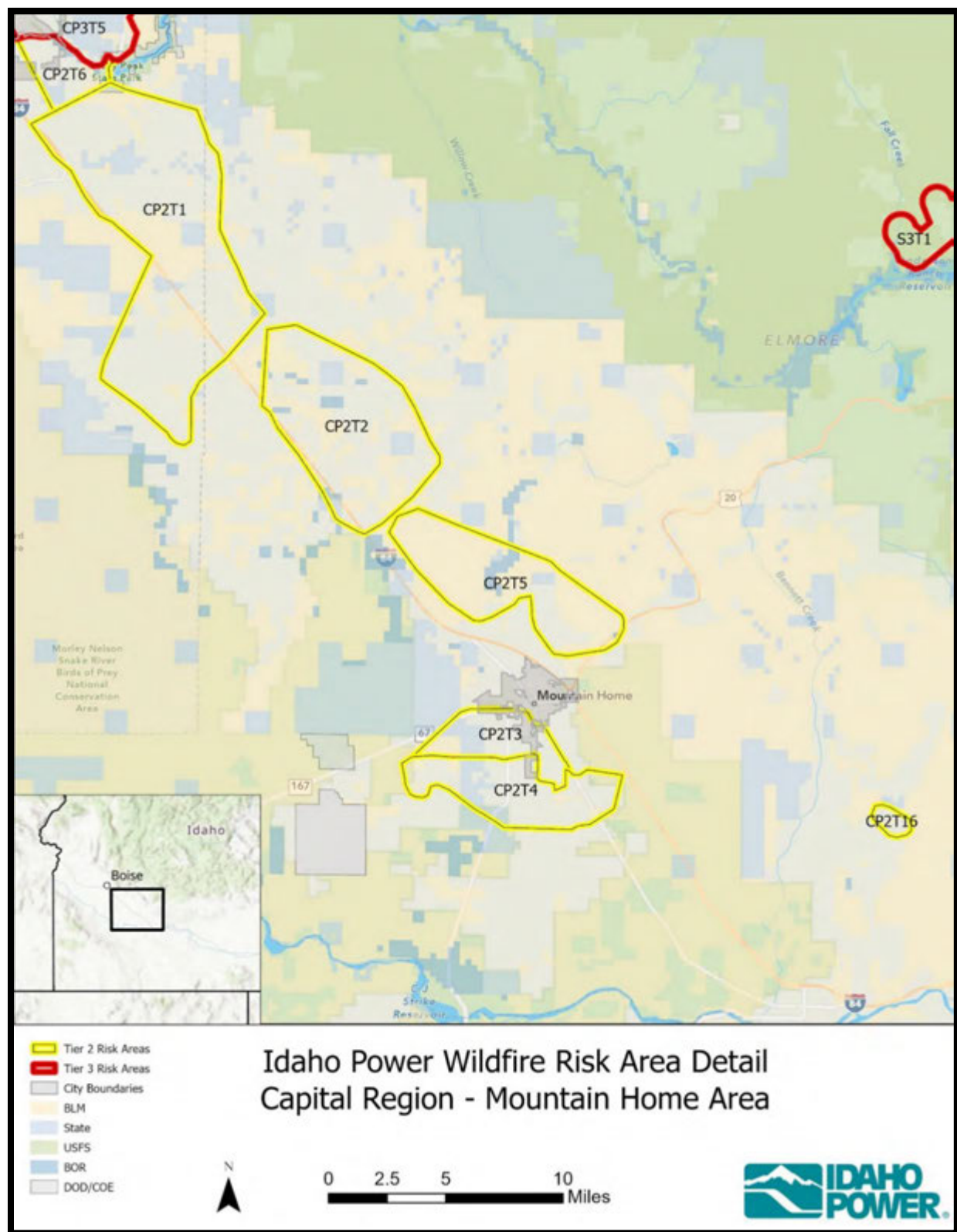


Figure 7
Capital Region—Mountain Home Area

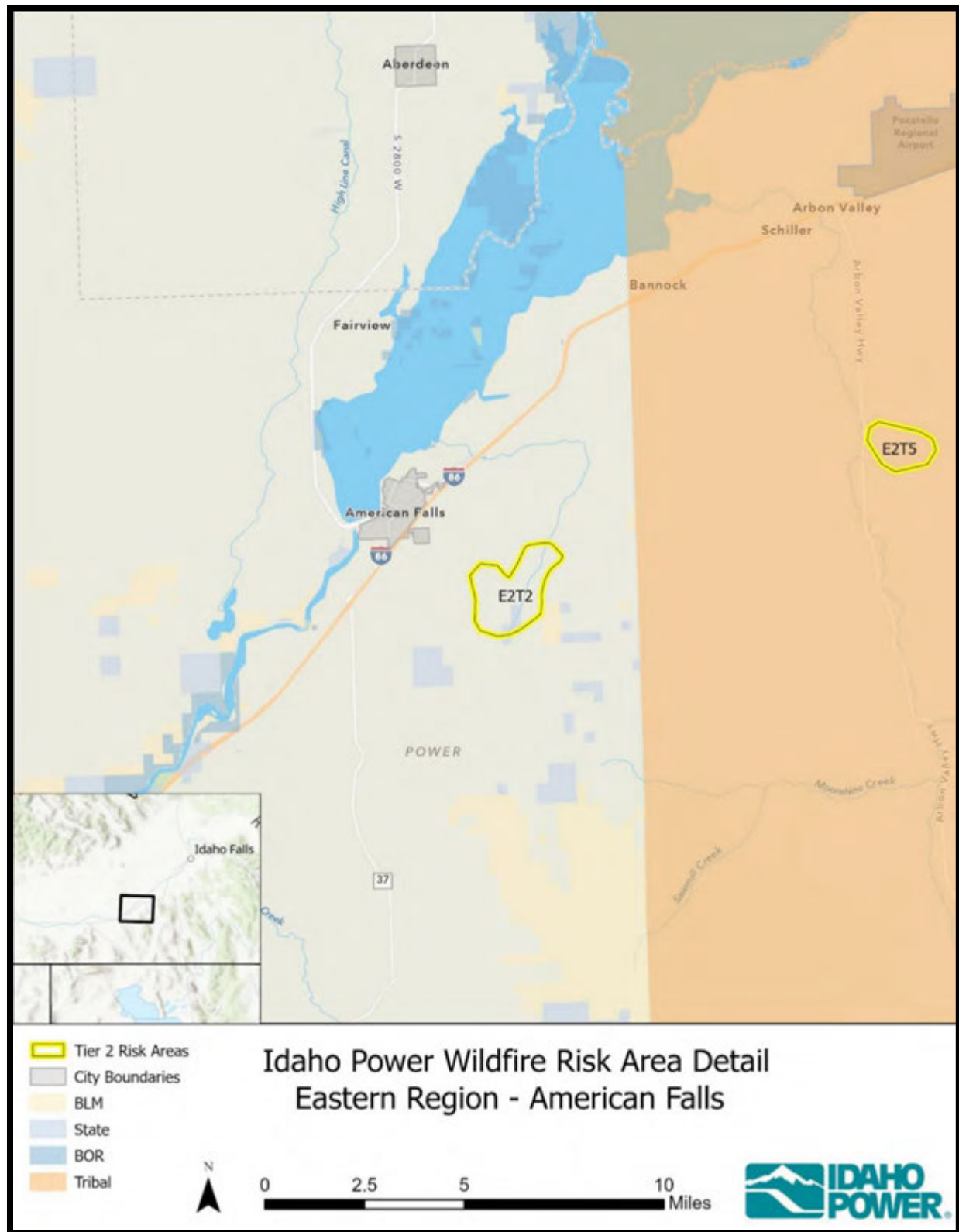


Figure 8
Eastern Region—American Falls

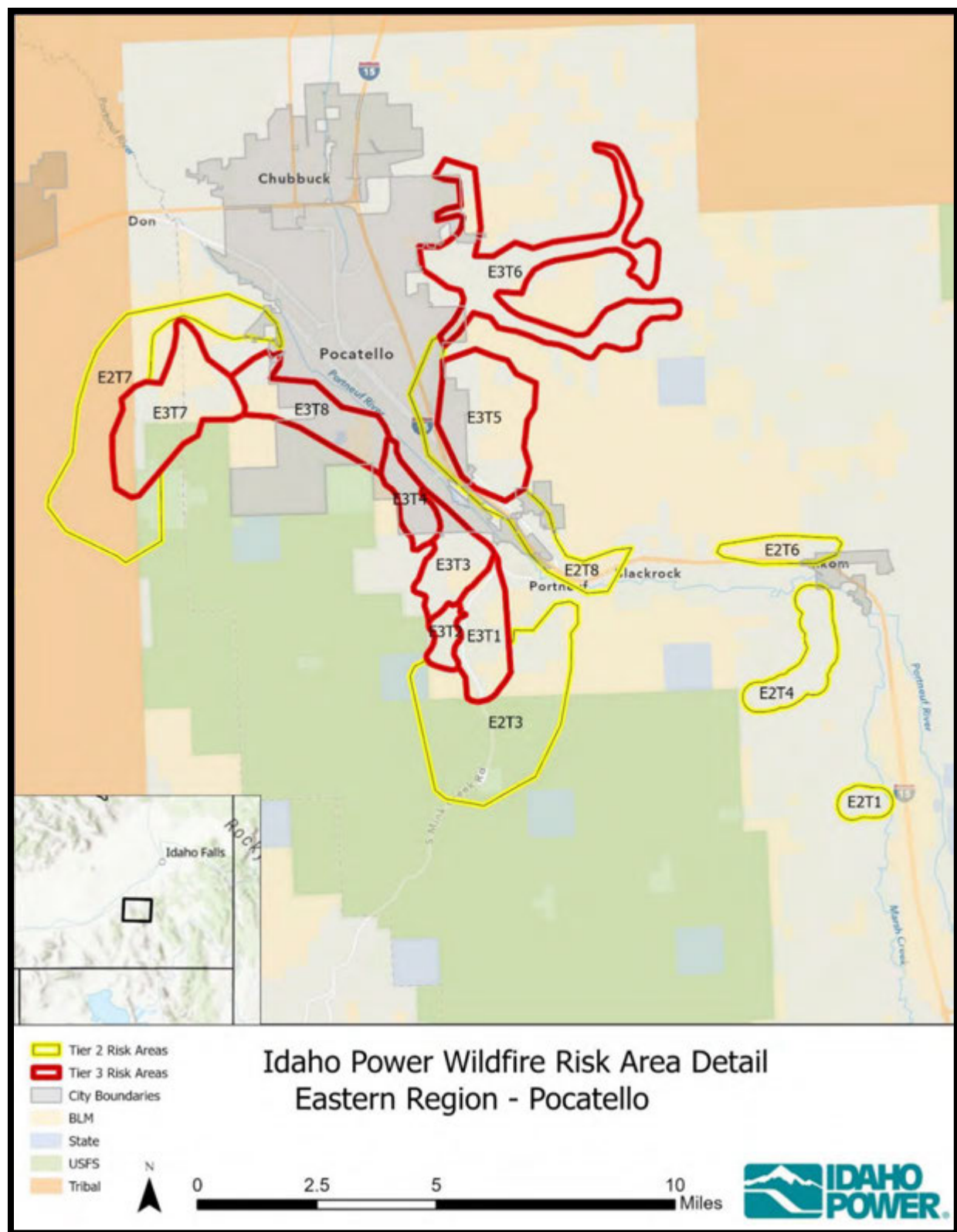


Figure 9
Eastern Region—Pocatello

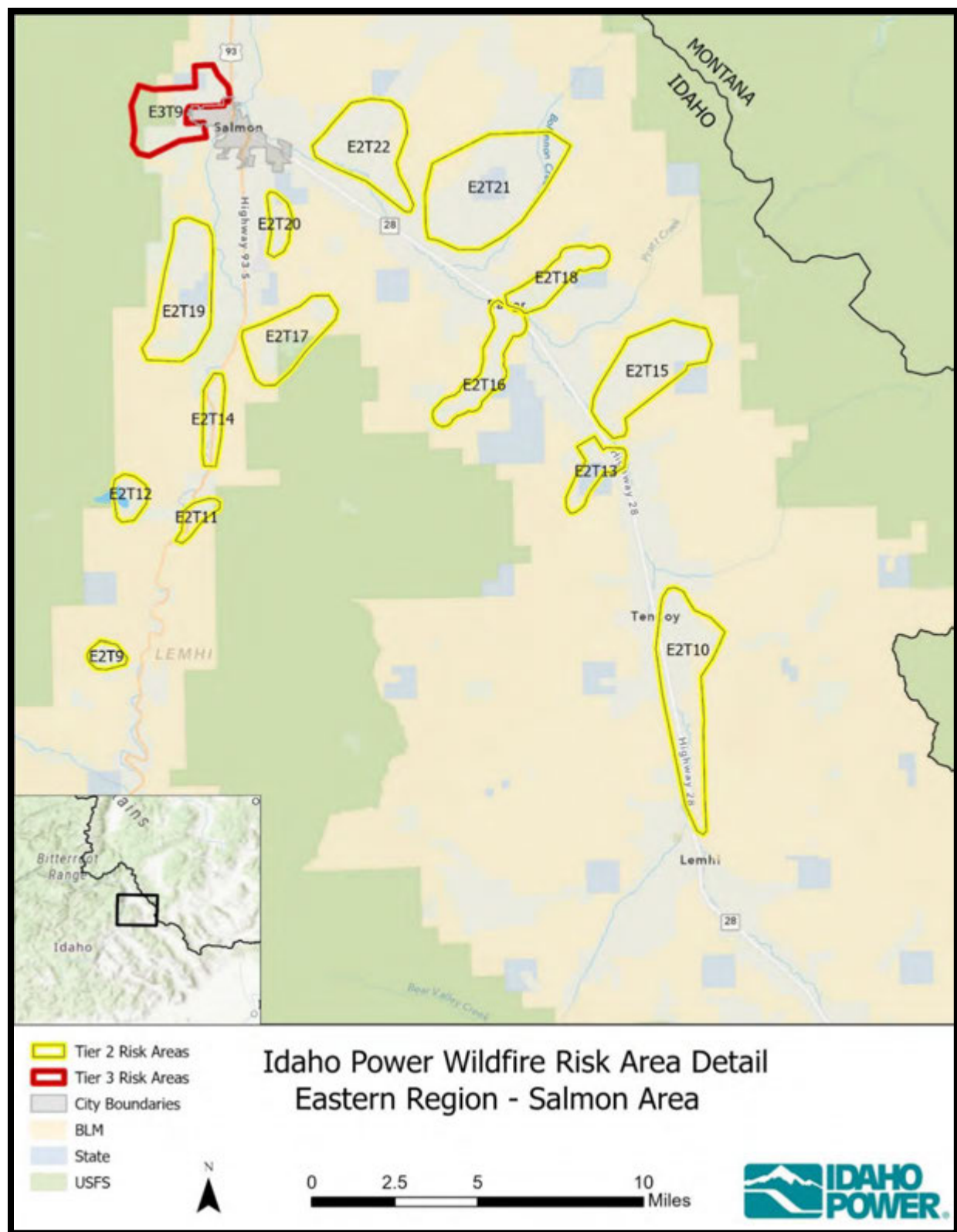


Figure 10
Eastern Region—Salmon Area

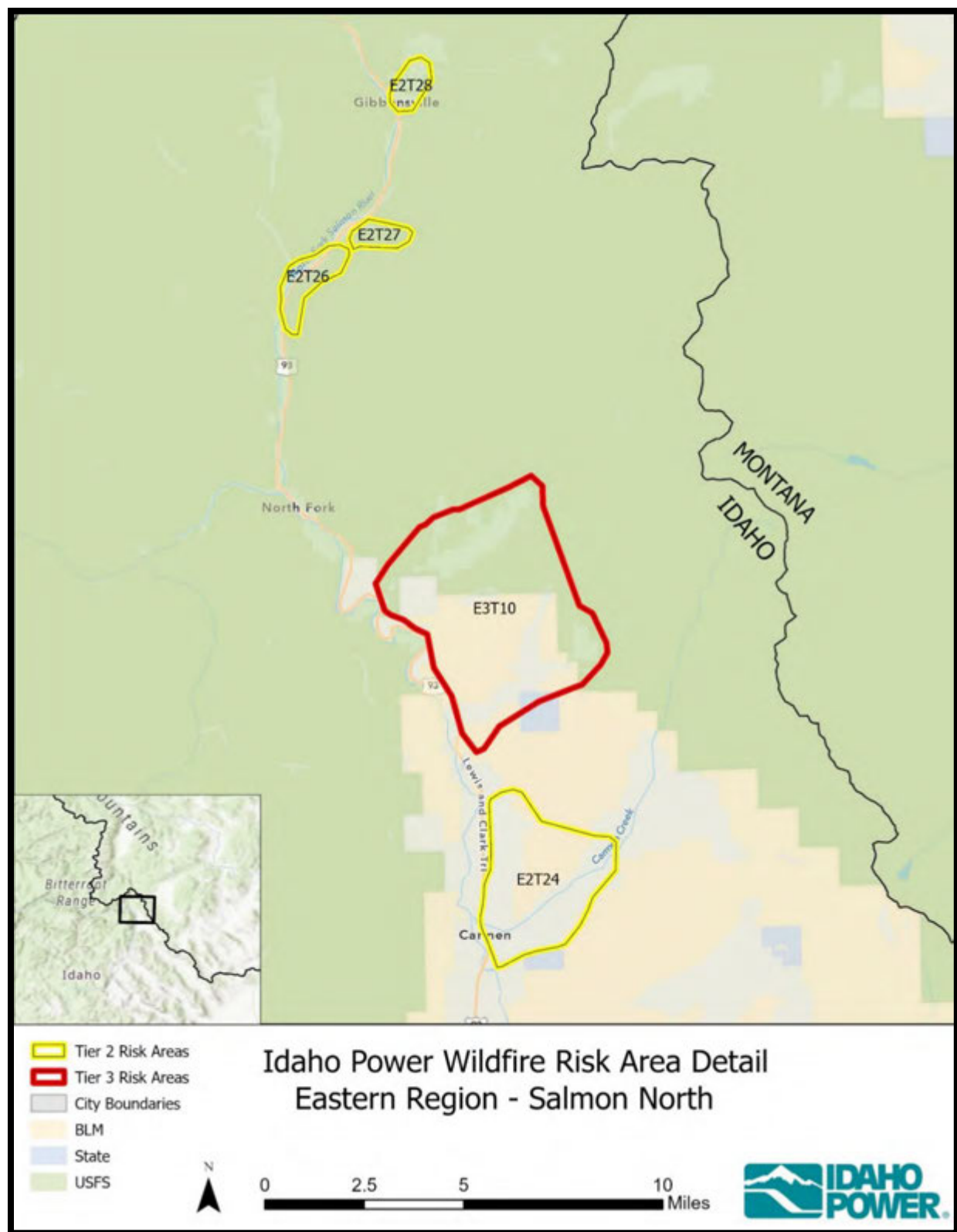


Figure 11
Eastern Region—Salmon North

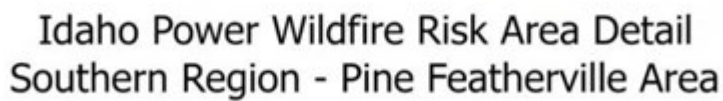


Figure 12
Southern Region—Pine Featherville Area

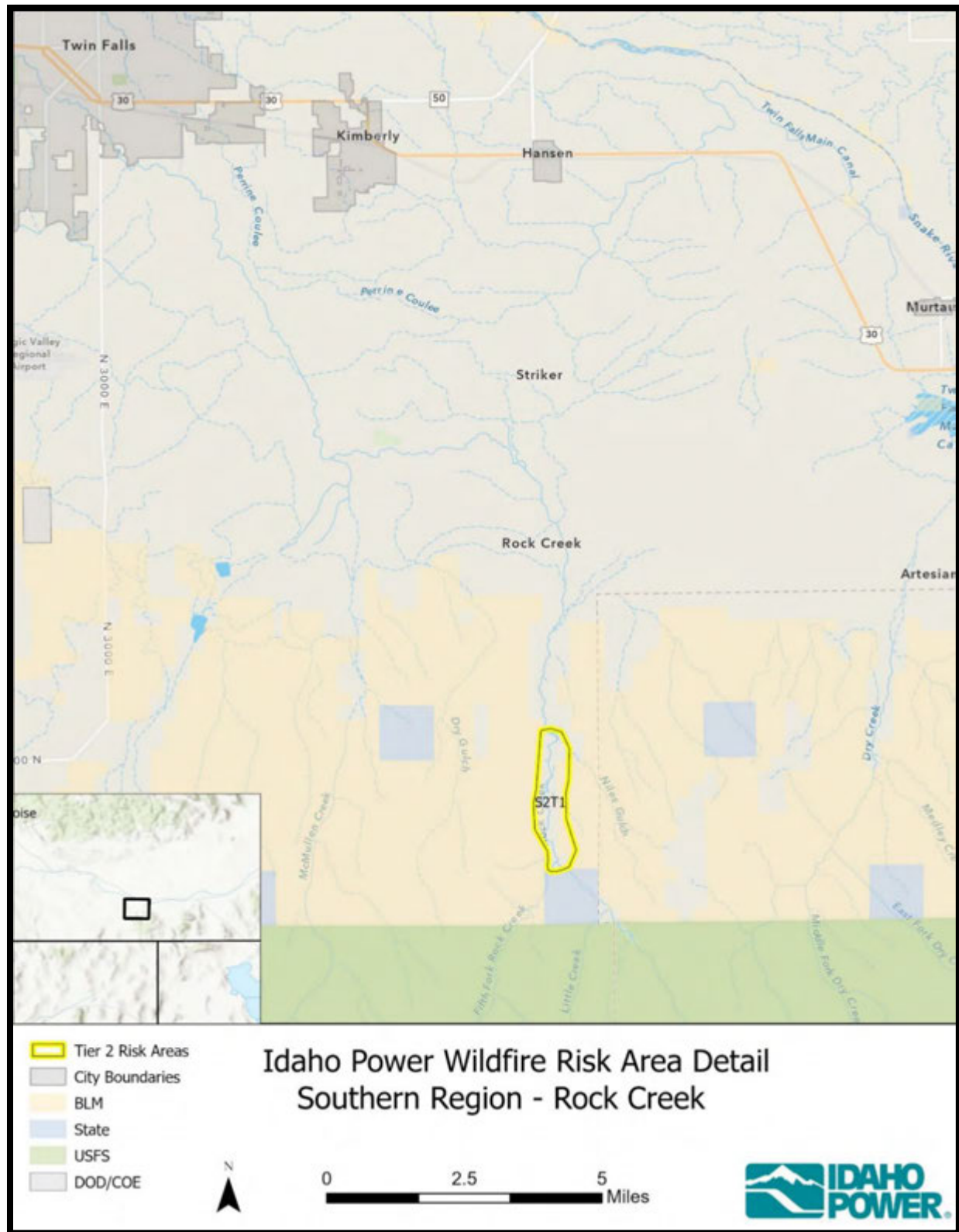


Figure 13
Southern Region—Rock Creek

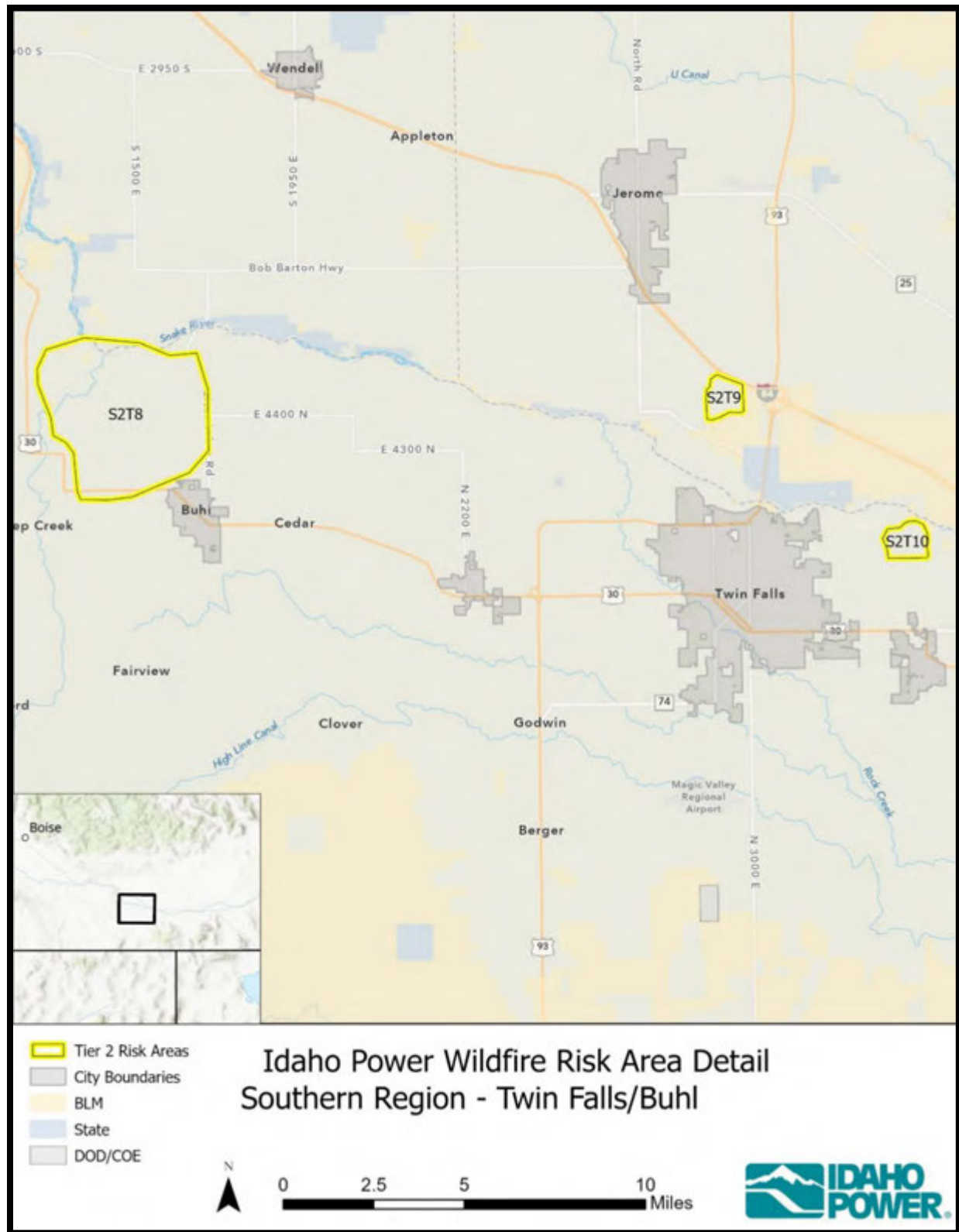


Figure 14
Southern Region—Twin Falls/Buhl

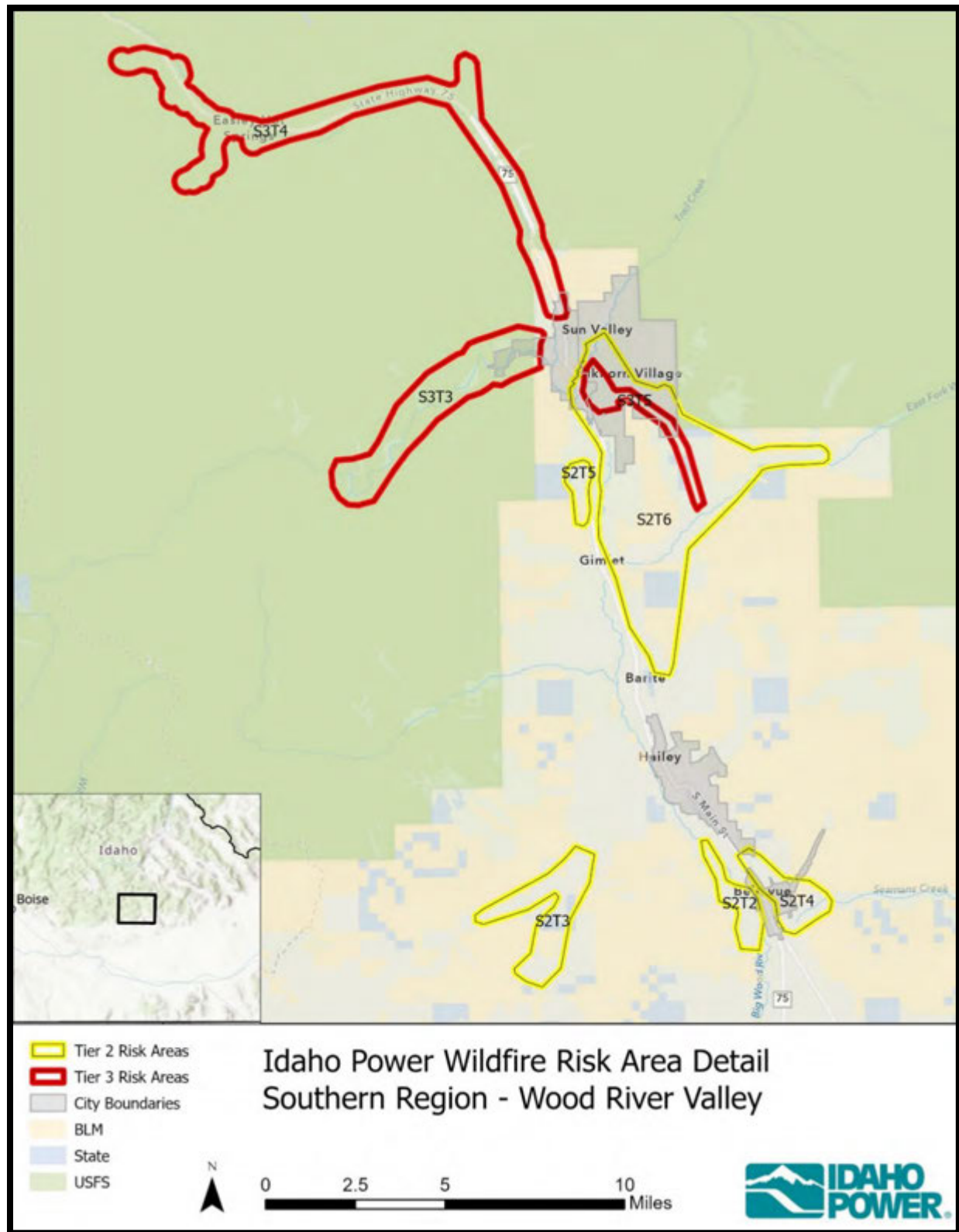


Figure 15
Southern Region—Wood River Valley

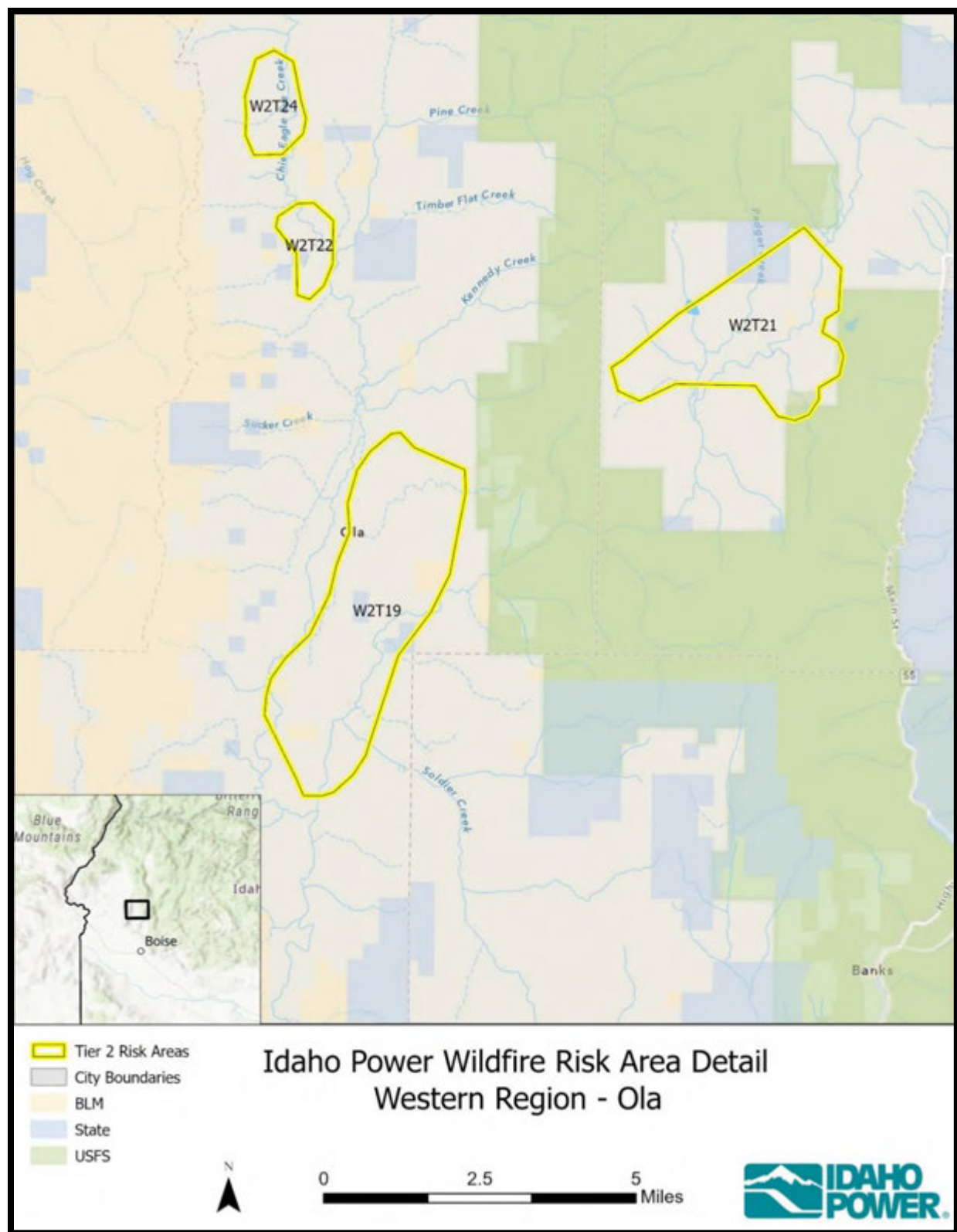


Figure 16
Western Region—Ola

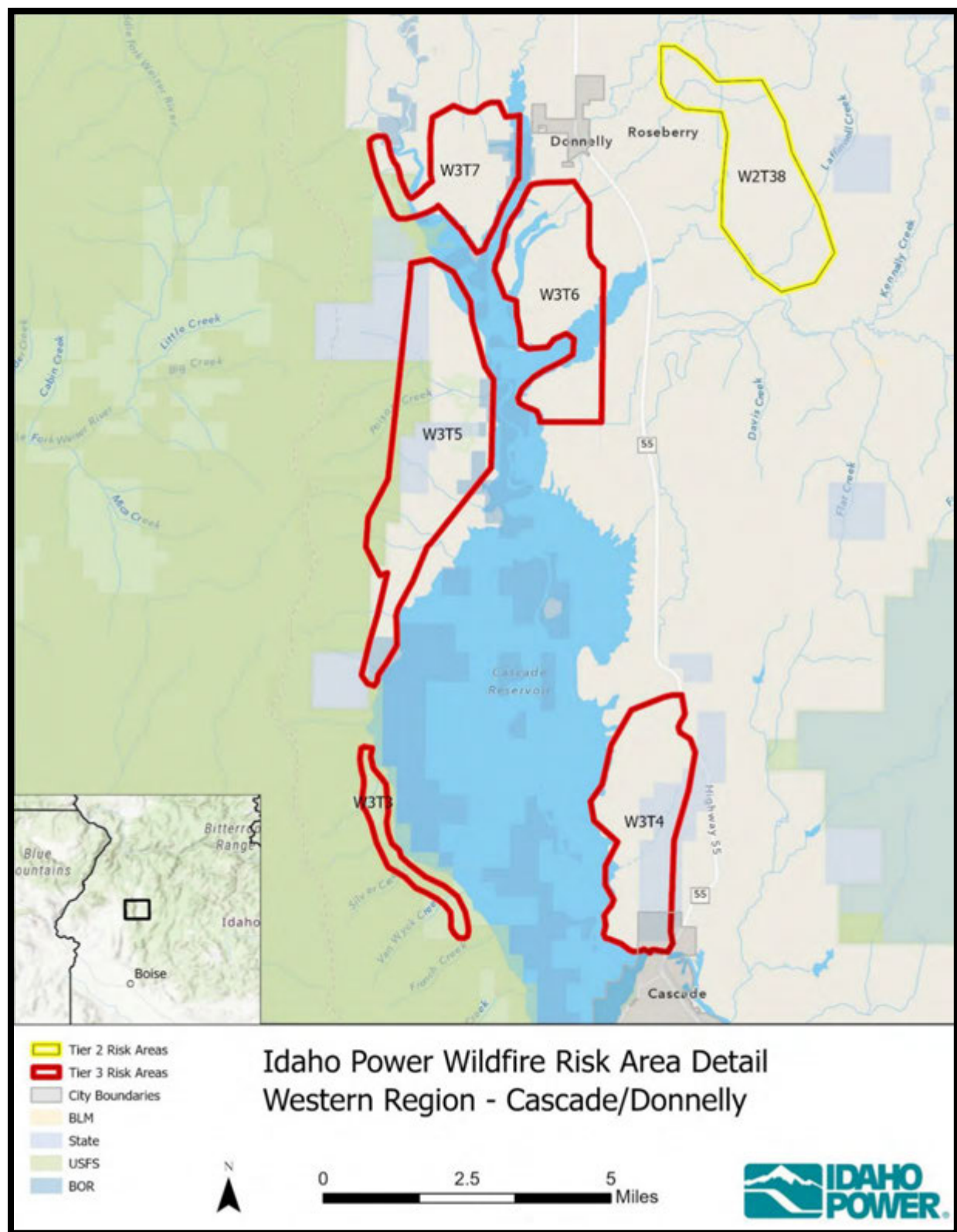


Figure 17
Western Region—Cascade/Donnelly

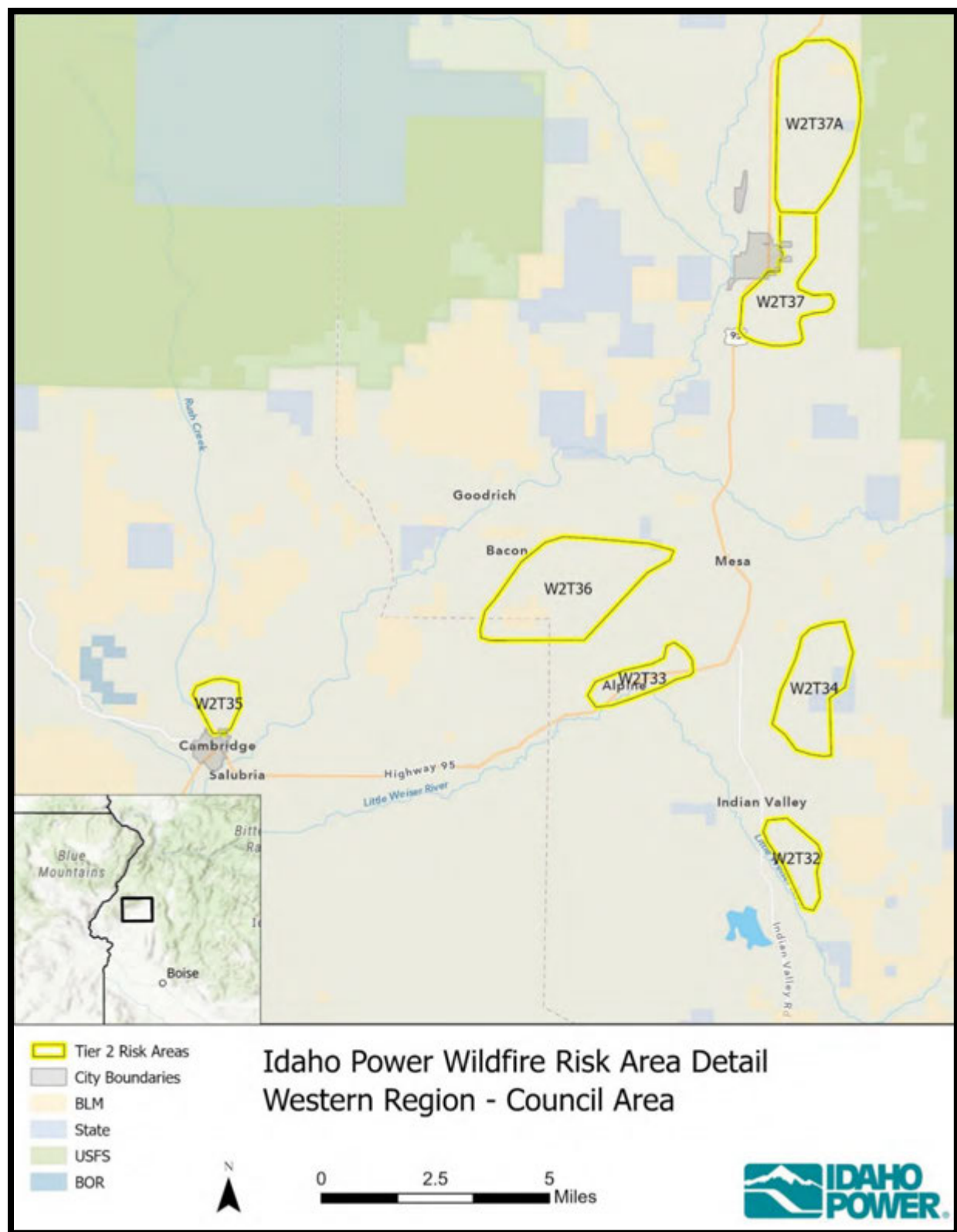


Figure 18
Western Region—Council Area

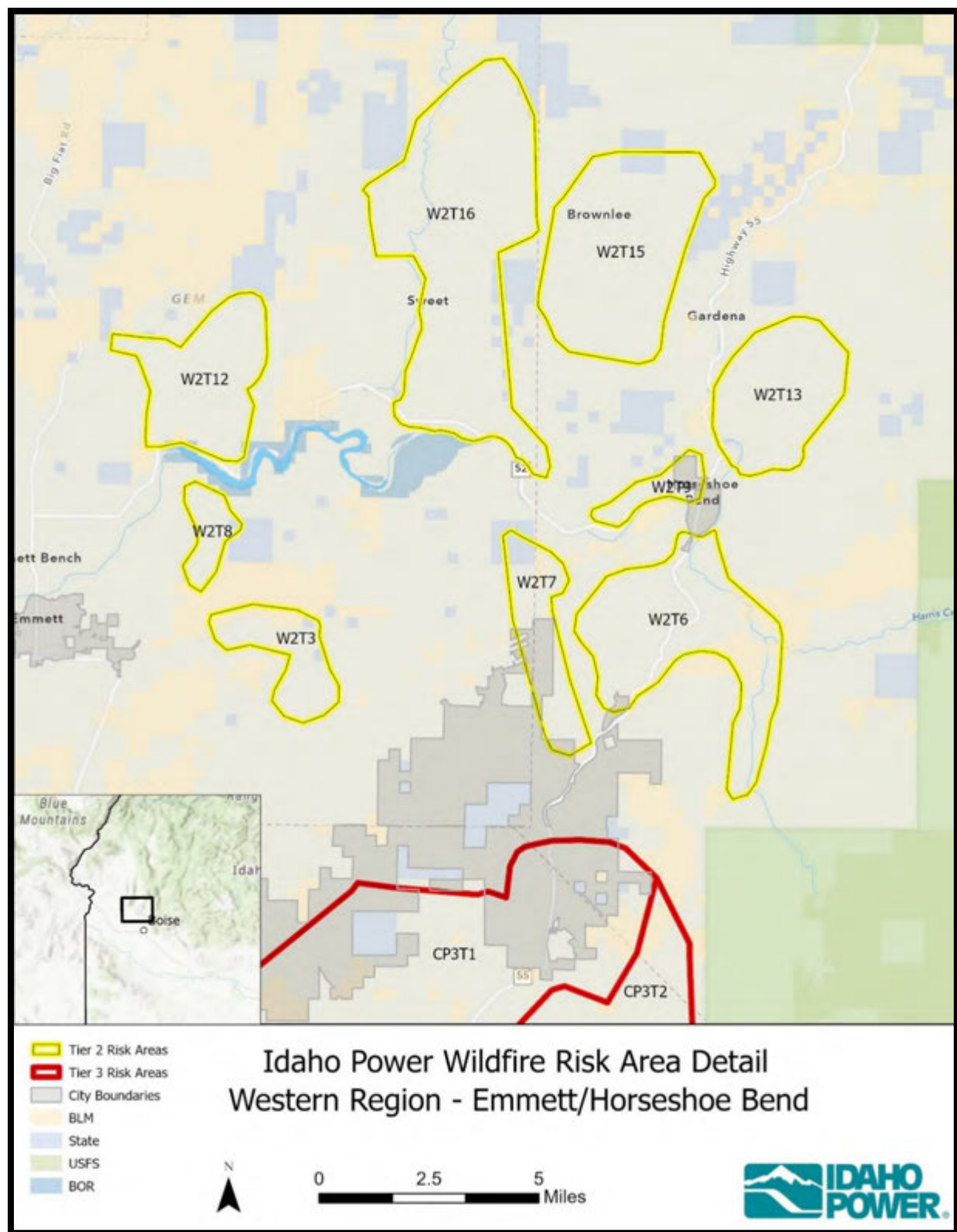


Figure 19
Western Region—Emmett/Horseshoe Bend

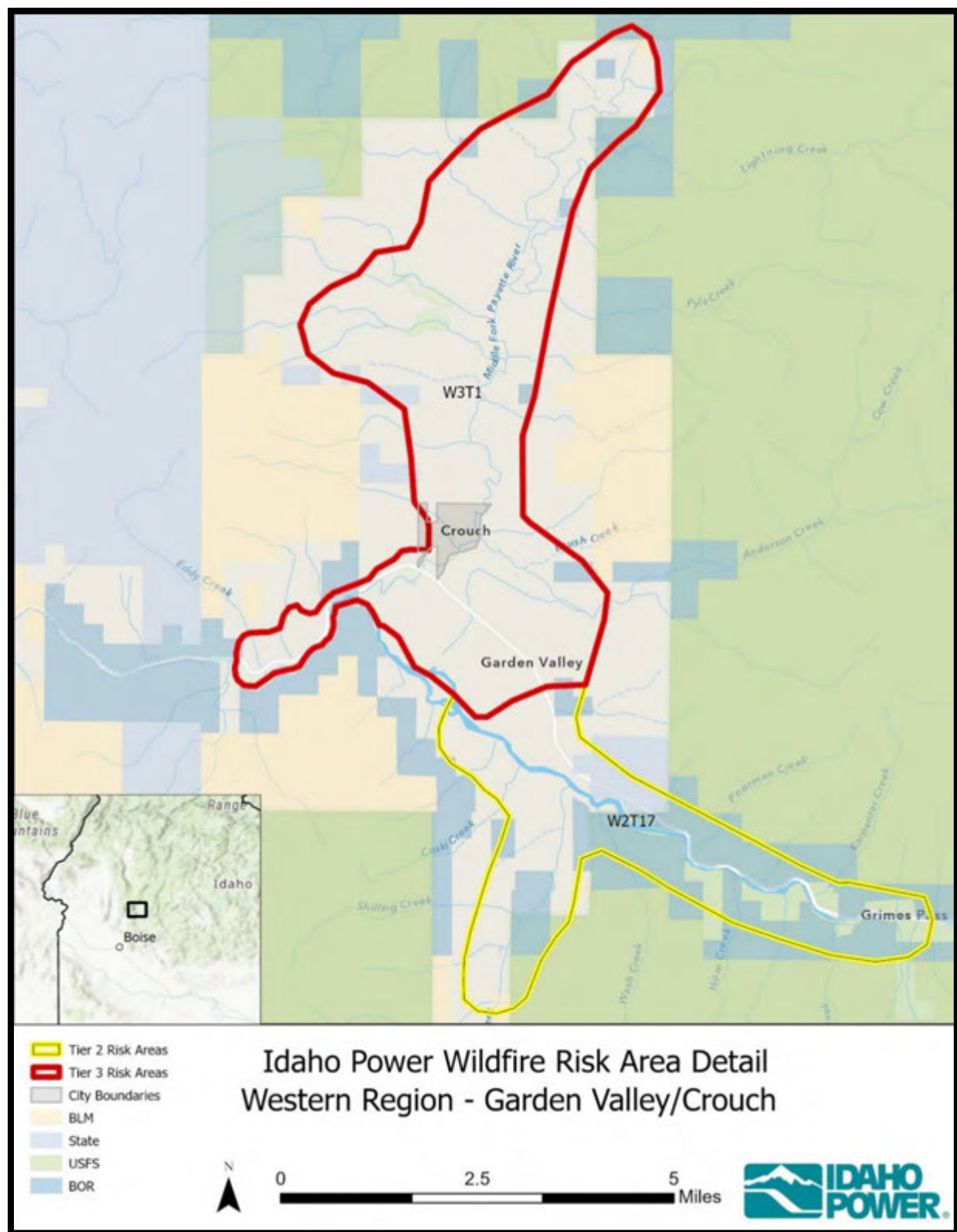


Figure 20
Western Region—Garden Valley/Crouch

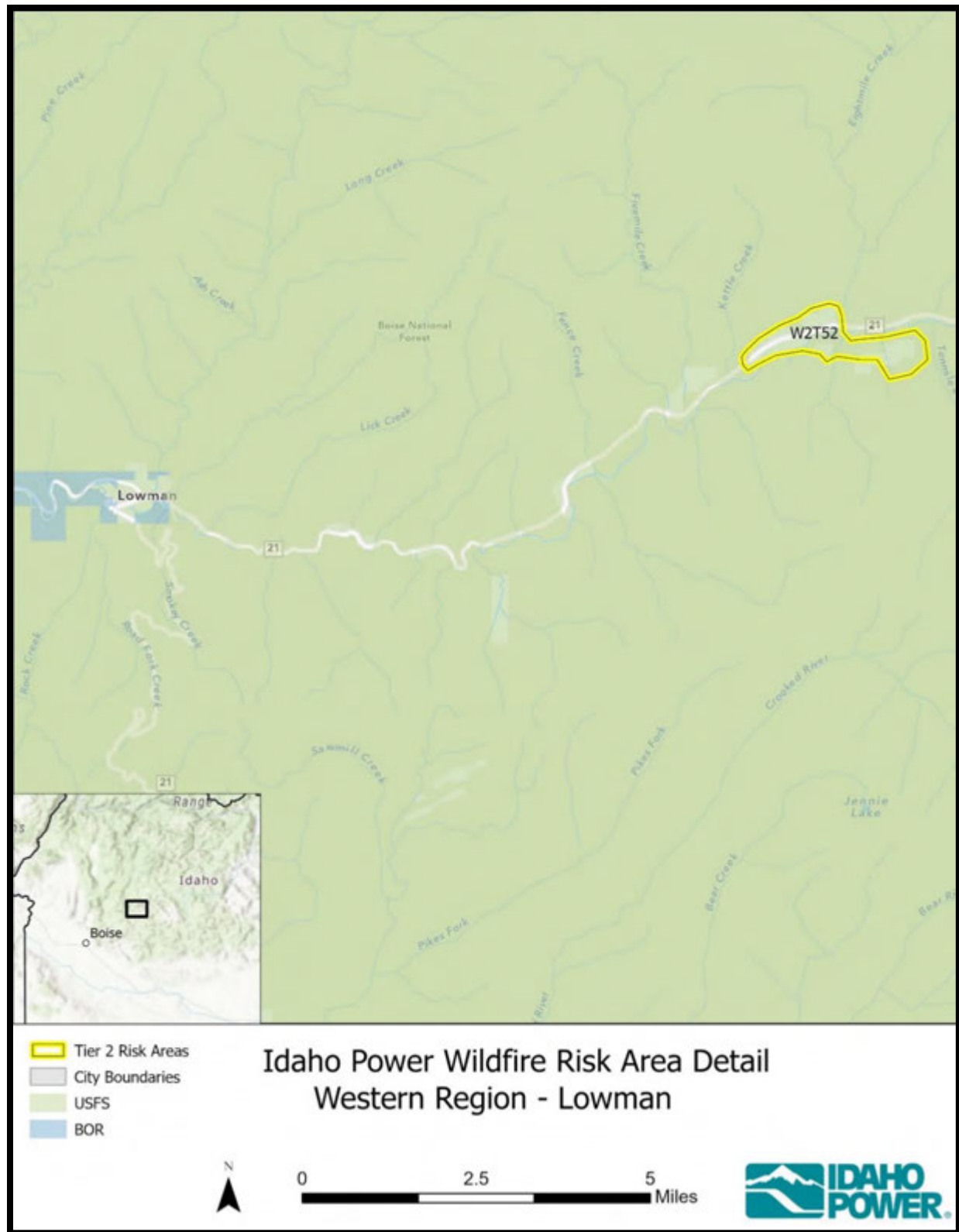


Figure 21
Western Region—Lowman

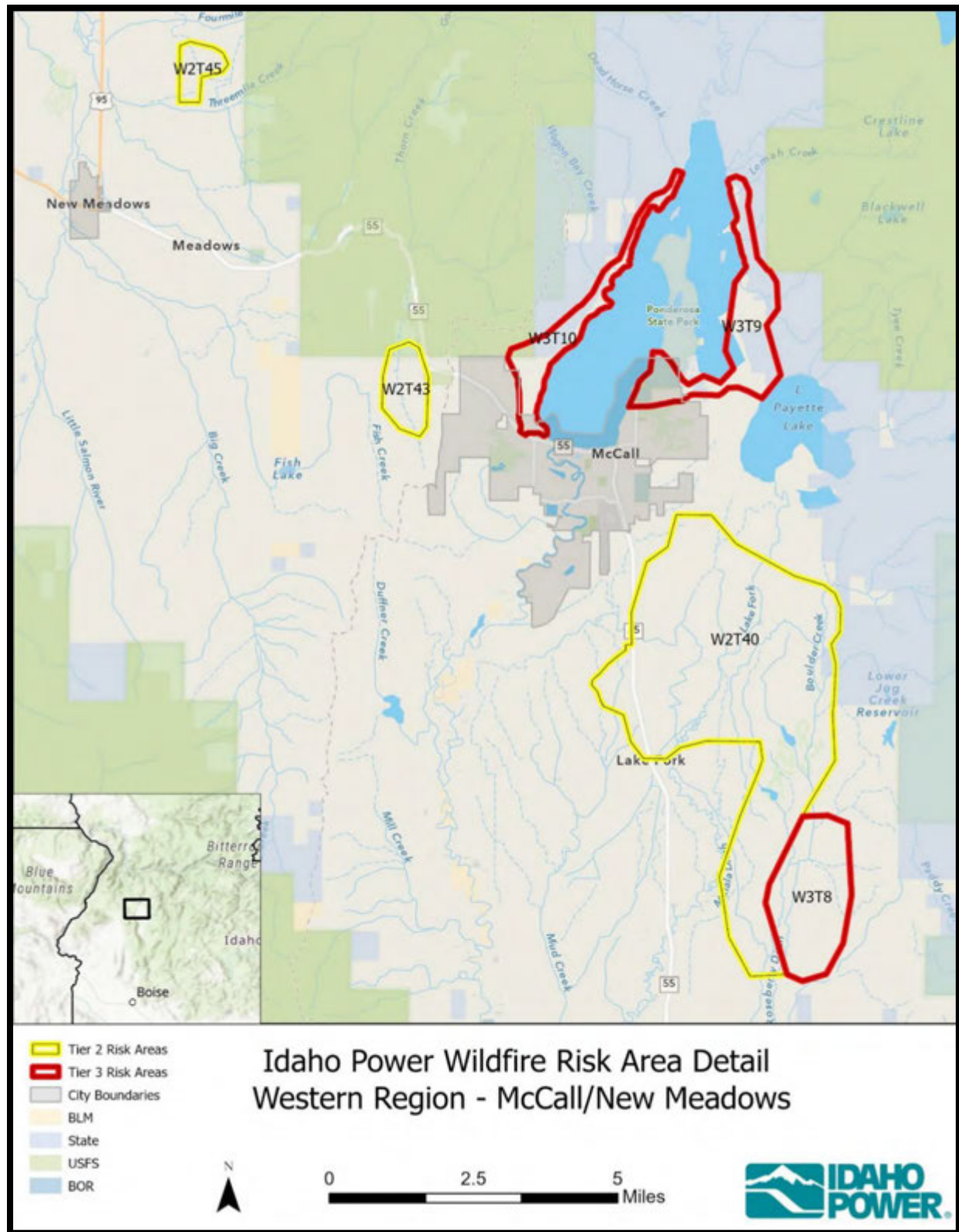


Figure 22
Western Region—McCall/New Meadows

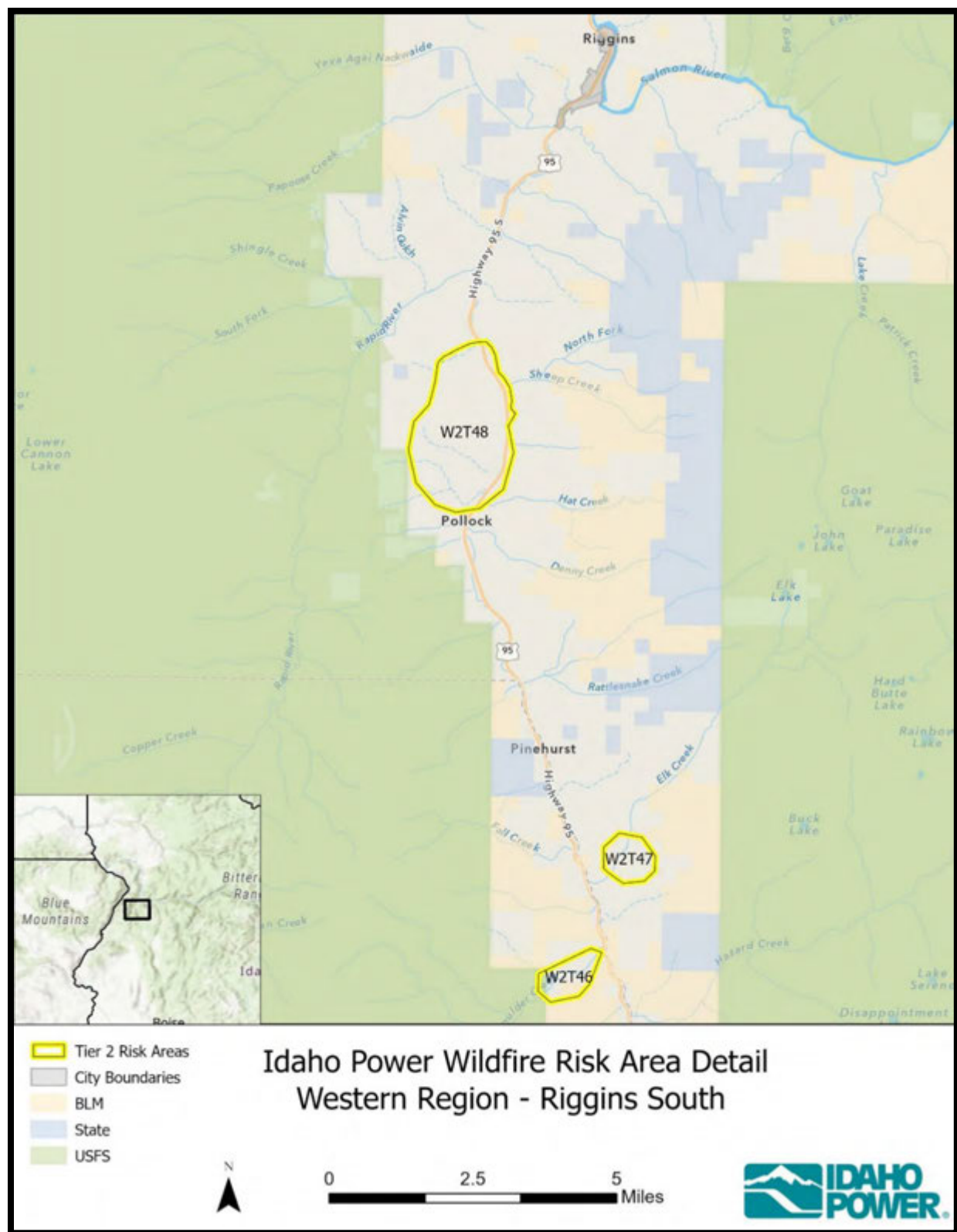


Figure 23
Western Region—Riggins South

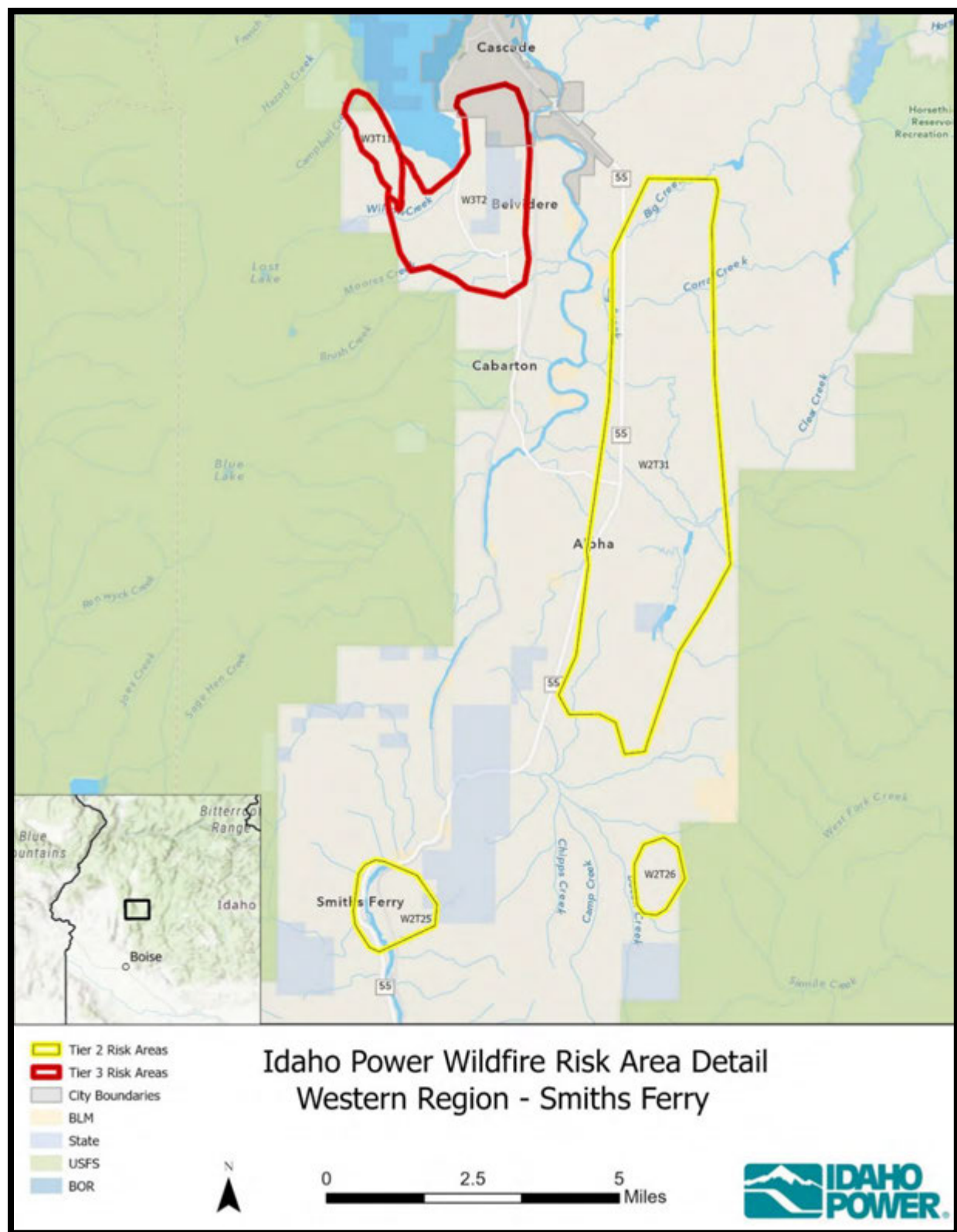


Figure 24
Western Region—Smiths Ferry

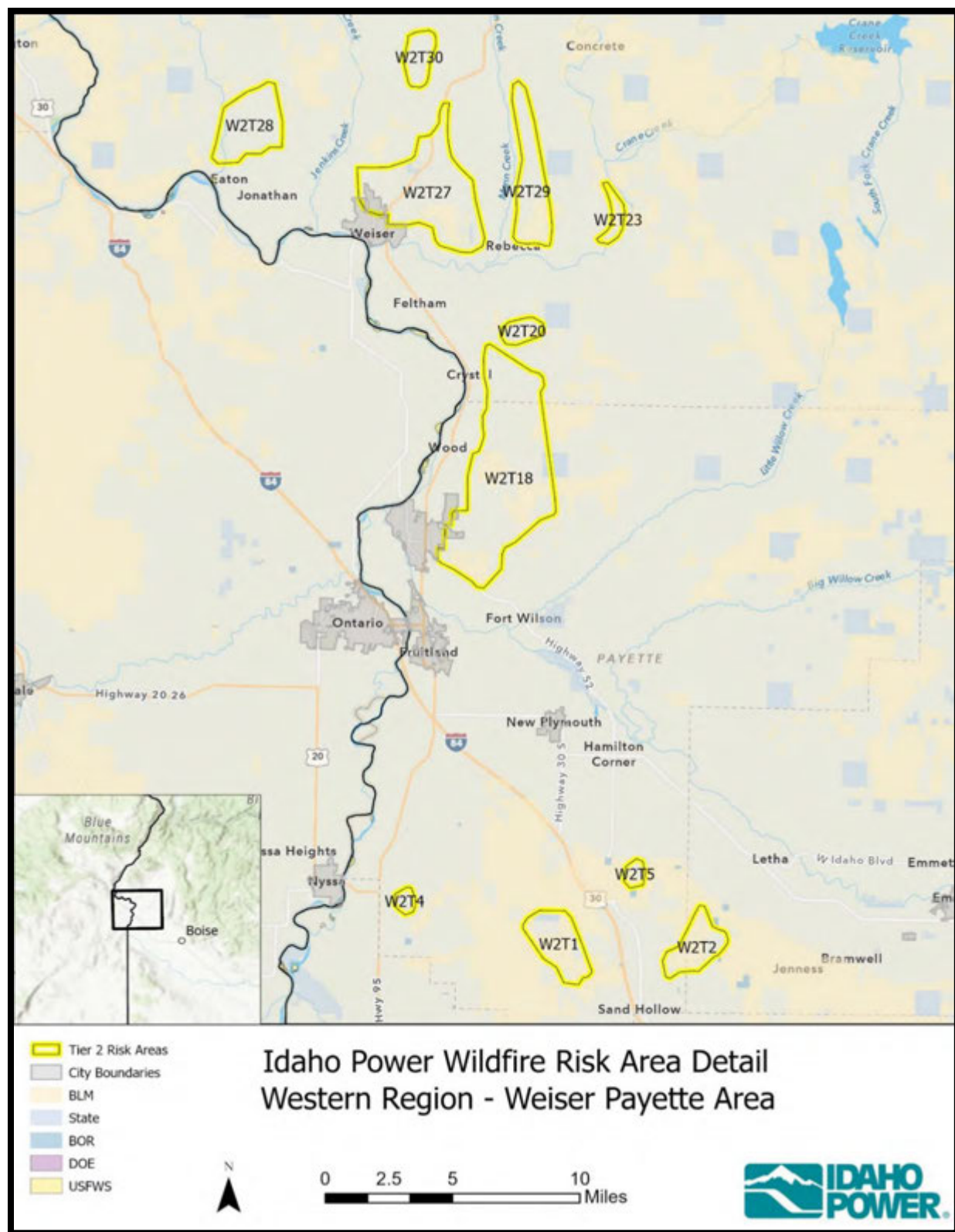


Figure 25
Western Region—Weiser Payette Area

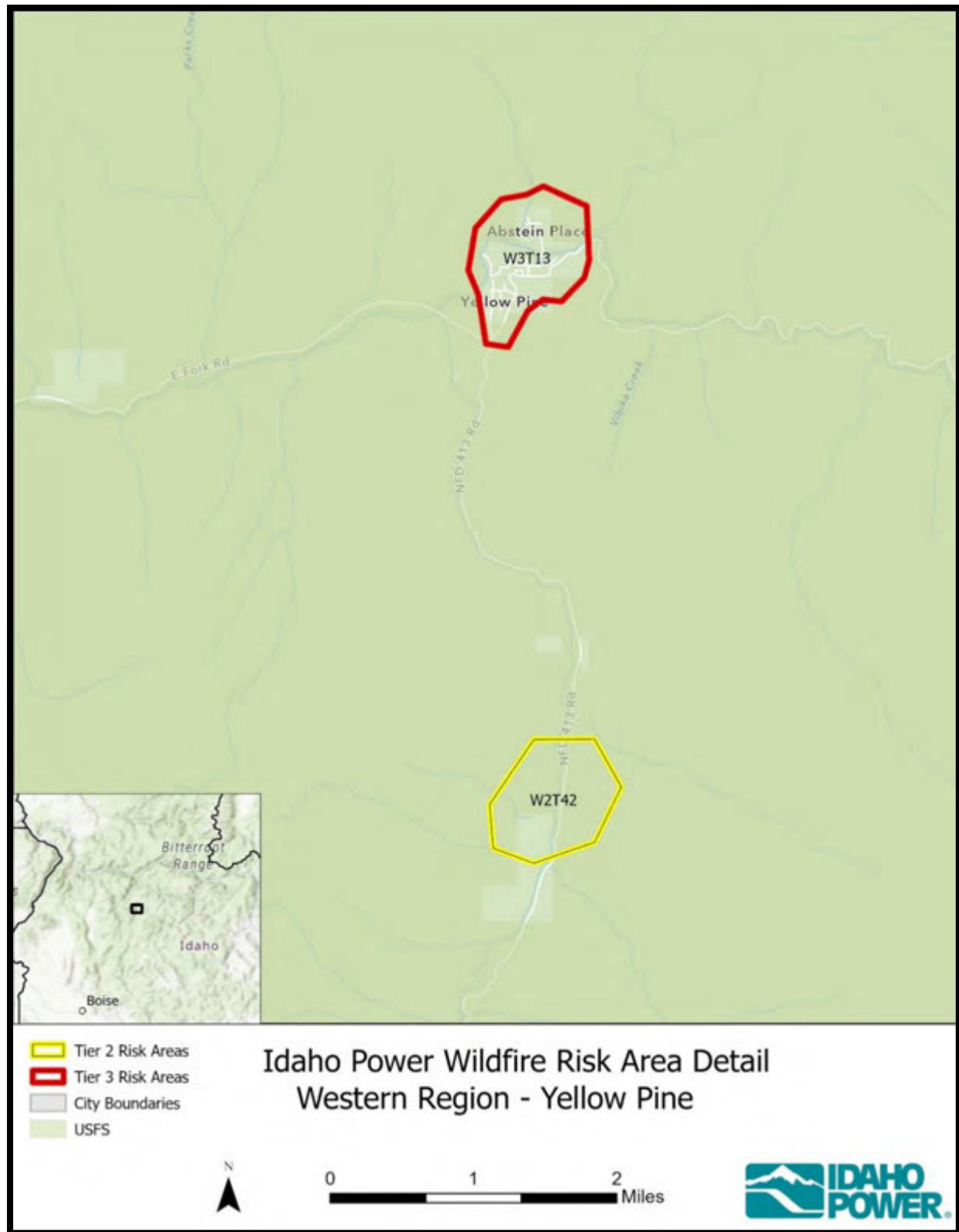


Figure 26
Western Region—Yellow Pine

Appendix D. Idaho and Montana Requirements and Recommendations

October 2025

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This appendix is intended to aid reviewers in locating content specific to the various statutory and regulatory requirements and recommendations pertaining to Idaho Power's *Idaho and Montana Wildfire Mitigation Plan 2026* (WMP). This appendix first discusses Idaho requirements and recommendations and then addresses Montana requirements and recommendations. The mapping Idaho Power provides in Appendix D is provided for ease of reference and is non-exhaustive. The WMP is a complex document. There may be content in sections or appendices not identified in relation to a specific requirement or recommendation that pertain to that requirement or recommendation.

Idaho Requirements and Recommendations

This appendix provides information specific to WMP requirements, as well as WMP-related recommendations, in Idaho pursuant to the Idaho Wildfire Standard of Care Act (WSCA) and as directed by the Idaho Public Utilities Commission (IPUC).

Idaho Wildfire Standard of Care Act and IPUC Order No. 36774 Requirements

Below is a mapping of WMP requirements set forth in the WSCA and in Order No. 36774 issued by the IPUC in Case No. GNR-E-25-02, including the IPUC WMP Guidelines (Exhibit B to Order No. 36774), to the applicable section(s) within Idaho Power's WMP.

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
<i>(3) Each wildfire mitigation plan shall be developed using approaches and methods that are designed to protect the public interest and are reflective of and commensurate with the size and complexity of the electric corporation's operations and of the nature of the fire risk. At a minimum, each wildfire mitigation plan shall identify a means for mitigating wildfire risk that reflect a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.</i>	Not addressed.	Section 1. Introduction Section 2. Geographical Risk Assessment Section 3. Cost-Benefit Approach Section 4. Situational Awareness and Monitoring Section 5. Mitigation Activity: Workforce Preparedness Section 6. Mitigation Activity: Line Operation Practices Section 7. Infrastructure Inspection and Asset Management Section 8. Methods of Line Design Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs Section 11. Public Outreach and Engagement Section 12. Government, Industry, and Peer Utility Outreach Section 13. Performance Monitoring Section 14. WMP Cost Summary Appendix A: Wildland Fire Preparedness and Prevention Plan Appendix B: Public Safety Power Shutoff Plan Appendix F: Wildfire Mitigation Activities & Cost Forecast 2026-2030

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
<i>(3)(a) Identifying geographical areas where an electric corporation has infrastructure or equipment that the electric corporation considers may be subject to a heightened risk of wildfire at the time the wildfire mitigation plan is finalized by the electric corporation.</i>	- The electric corporation must include a description of the wildfire risk assessment or model used to guide wildfire mitigation activities. The assessment should identify geographic areas with elevated fire risk, considering factors such as vegetation, weather, topography, historical fire occurrence, structure density, and asset location. - The electric corporation should provide a map of the identified risk areas within its service territory within this section of its WMP. The identified risk areas should be defined with different level of fire risks to the utility. There must be an explanation of what determines each level of risk and risk assessments of each service territory should be updated annually in the WMP.	Section 2. Geographical Risk Assessment <i>Appendix C: Wildfire Risk Zone Map Book</i>
<i>(3)(b) Preventative actions and programs that the electric corporation will carry out to reduce the risk of wildfire.</i>	The electric corporation must describe all preventative actions and programs that it will carry out to reduce the risk of wildfire, in addition to actions and programs specified in statute and by the IPUC. For the three large investor-owned utilities, a WMP's preventative actions and programs must include, but are not limited to, the following: Situational Awareness Efforts - May include use of technology to aid in weather monitoring; fire season outlook; daily, weekly, and monthly weather and fire modeling risk, etc. - Consistent with 61- 1803(3)(f) and the IPUC WMP Guidelines. Asset Inspections - Must include the frequency and standards of inspections for each type of electric infrastructure within areas of elevated wildfire risk. - Consistent with 61- 1803(3)(g)(i) and the IPUC WMP Guidelines. Enhanced Vegetation Management Practices in Risk Zones - May include shorter vegetation management cycles than routine cycles, risk tree programs, etc. - Consistent with 61- 1803(3)(g)(iii) and the IPUC WMP Guidelines. Operation Practices During Heightened Wildfire Risk Days or Zones - May include restrictions to workforce practices, potential use of proactive de-energization. - Consistent with 61-1803(3)(g)(ii) and the IPUC WMP Guidelines. Community Education - May include public service announcements to create awareness and provide education of wildfire risks, providing preventative measures, etc.	Section 4. Situational Awareness and Monitoring Section 5. Mitigation Activity: Workforce Preparedness Section 6. Mitigation Activity: Line Operation Practices Section 7. Infrastructure Inspection and Asset Management Section 8. Methods of Line Design Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs Section 11. Public Outreach and Engagement Section 14. WMP Cost Summary <i>Appendix A: Wildland Fire Preparedness and Prevention Plan</i> <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i> <i>Appendix F: Wildfire Mitigation Activities & Cost Forecast 2026-2030</i>

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
<i>(3)(c) Community outreach and public awareness efforts that the electric corporation will use before, during, and after wildfire season to identify and inform the public of relevant wildfire risks and notify the public of wildfire-related outages.</i>	- Consistent with 61-1803(3)(c) and 61-1803(3)(d). A WMP's preventative actions and programs may include, but are not limited to, the following: System Hardening Strategies - May include pole replacements, line rebuilding, or undergrounding if necessary, strategic fuse or reclosers installations, etc. Workforce Preparedness - May include workforce training, equipment provided to employees to reduce the risk of wildfire, etc. Pilot Programs - If applicable. This section should include discussion of how each utility maintains community outreach and public awareness before, during, and after wildfire season to support customer awareness and education of wildfire risks and notify the public of wildfire-related outages. This discussion should include, but is not limited, to the following: - Description of customer communication efforts related to wildfire mitigation, including efforts to increase awareness and education of the utility's plan, explanation of key mitigation activities, and efforts supporting public readiness. - If the utility utilizes de-energization, a description of public education efforts and communication protocols for before, during, and after a de-energization event. The communication protocols should clearly identify which customers could and will be impacted if a de-energization event is pursued and identify any advanced notifications for critical infrastructure or customers, which may include but is not limited to, hospitals and other medical facilities, schools, police, fire, emergency operation centers, any jails/prisons, other utilities, and vulnerable customers. - Explanation of the communication methods the electric corporation intends to use, such as mail, flyers, emails, calls, texts, a notification system, its website, etc.	Section 11. Public Outreach and Engagement <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>(3)(d) Outreach efforts to coordinate with federal, state, tribal, and local officials and agencies on wildfire preparedness and emergency response plans.</i>	The electric corporation must describe how it engages with and coordinates with federal, state, tribal, and local officials and agencies on wildfire preparedness and emergency response in the plan year. This discussion may include, but is not limited to: If applicable, Public Safety Power Shutoff ("PSPS") tabletop exercises with interested parties and agencies.	Section 4.6 Wildfire Detection Cameras Section 10.2.2 Fuels Reduction Shared Stewardship (Pilot)

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
	- Communication with the agencies and the ESF-12 coordinator within the PUC. - If applicable, mitigation efforts with the agencies. The WMP must detail all relationships (such as Bureau of Land Management [BLM] and Forest Service) it has established that may benefit the wildfire mitigation program, contribute to program costs, or provide cost sharing opportunities in its WMP.	Section 11. Public Outreach and Engagement Section 12. Government, Industry and Peer Utility Engagement
<i>(3)(e) Financially prudent and reasonably practicable methods of line design for new, planned, and existing lines to mitigate fire risk.</i>	The electric corporation must describe how its methods of line design for new lines and planned upgrades reduce wildfire ignition potential in heightened wildfire risk areas. This must include evaluation of costs to wildfire risk reductions. Additionally, this must include how the electric corporation clearly identifies, selects, and evaluates projects that reflect a balance of mitigation costs with resulting reduction in wildfire risk for the following, but is not limited to: - Line rebuilding within the WMP. - Undergrounding lines within the WMP. - Installation of covered conductor. - Installation of non-wooden cross arms. If any, describe any flexible infrastructure such as automatic reclosers and remote-controlled devices that support remote operations.	Section 3. Cost-Benefit Approach Section 6. Mitigation Activity: Line Operation Practices Section 8. Methods of Line Design Section 10. Additional Preventative Actions and Programs Section 14. WMP Cost Summary <i>Appendix F. Wildfire Mitigation Activities & Cost Forecast 2026-2030</i>
<i>(3)(f) Monitoring of forecasted and current weather data for the purpose of assessing and responding to current and anticipated fire risk.</i>	This section should include a description of how the electric corporation monitors forecasted and current weather conditions for the purpose of assessing and responding to current and anticipated wildfire risk. This description must include, but is not limited to, the following: - Identification of systems, tools, or external resources used to monitor weather, fire potential, or other situational awareness indicators. - If applicable, a description of how the utility utilizes weather forecasting, fire potential modeling, or similar tools, to inform mitigation activities and operational decisions. - Discussion of how situational awareness capabilities are integrated into daily or seasonal wildfire operations. - Discussion of how the electric utility becomes aware of another electric corporation's de-energization (e.g., Bonneville Power Administration) and how that is integrated into operations.	Section 2. Geographical Risk Assessment Section 4. Situational Awareness and Monitoring Section 5. Mitigation Activity: Workforce Preparedness Section 6. Mitigation Activity: Line Operation Practices Section 10. Additional Preventative Actions and Programs <i>Appendix A: Wildland Fire Preparedness and Prevention Plan</i> <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>(3)(g) Developing standards, procedures, and schedules, subject to timely approval of access</i>	This section should provide a summary of an electric corporation's programs for the inspection of electric infrastructure, assets, and facilities within areas identified as	Section 7. Infrastructure Inspection and Asset Management

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
<i>to rights-of-way, if necessary, for the following actions:</i> <i>(i) Inspection of the electric corporation's assets, infrastructure, and facilities within the areas that are identified as heightened fire risk areas in the wildfire mitigation plan, where financially prudent and reasonably practicable.</i>	heightened wildfire risk areas to identify and correct conditions that could contribute to wildfire ignition. This summary must include, but is not limited to, the following: • Description of inspection standards for each type of infrastructure, assets, and facilities. • Description of schedules for inspections for each type of infrastructure, asset, and facility. • Description of baseline routine inspection methods and enhanced inspection methods for higher fire-risk areas, which may include the use of advanced or pilot technologies. • Explanation of how identified defects are classified, prioritized, and corrected. • Measurable targets/goals to be achieved within the WMP. (e.g., miles of lines inspected, corrected identified defects, etc.)	Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs <i>Appendix F: Wildfire Mitigation Activities & Cost Forecast—2026-2030</i>
<i>3(g)(ii) De-energization of the electric corporation's power lines, if considered appropriate by the electric corporation;</i>	If an electric utility plans to use de-energization as part of its wildfire mitigation efforts, this section must address the standards, criteria, and operational protocols for de-energization for encroachment of a wildfire, proactive de-energization (PSPS) to reduce fire risk, and de-energization from third-party energy providers. This discussion must include, but is not limited to the following: • A summary of the conditions under which de-energization may be used, if applicable. • The criteria or protocols for evaluating its appropriateness to engage. • Summary of the electric corporation's operational protocols for before, during, and after a de-energization event. • Description of how the electric corporation will coordinate with local emergency managers, operators of critical facilities, and affected communities before, during, and after a de-energization event. • Descriptions of other operations for limiting impact to affected communities, which may include community resource centers, emergency generators, backup batteries, etc.	Section 6. Mitigation Activity: Line Operation Practices. Section 14. WMP Cost Summary <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>3(g)(iii) Vegetation management within the areas that are identified as heightened fire risk areas in the wildfire mitigation plan and are within the electric corporation's rights-of-way or lands adjacent thereto and that threaten the power lines or other electric corporation infrastructure. If live marketable timber is</i>	This section must provide an overview of the utility's vegetation management program aimed at reducing the risk of vegetation-related contact with electric infrastructure in areas with heightened wildfire risk within its rights-of-way or lands adjacent thereto. Elements of this vegetation management section overview should include, but is not limited to, the following:	Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs Section 12. Government, Industry and Peer Utility Outreach Section 14. WMP Cost Summary

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
<i>identified for removal from timber company land adjacent to the rights-of-way, compensation at fair market value shall be made to the landowner for such timber.</i>	• Identification, description, and citation of vegetation management standards for elevated wildfire risk areas. • Explanation of how vegetation management standards, procedures, and schedules are different or the same as routine vegetation management. • Description of the current and planned vegetation management practices used to mitigate wildfire risk, including any enhancements in designated wildfire areas. • The electric corporation must explain how the electric utility considered vegetation management recommendations by other federal, state, and county agencies into its standards. • Must include measurable targets/goals to be achieved within the WMP. (e.g., miles of lines completed, risk trees removed, etc.) • Explanation of how identified risk trees are classified, prioritized, and corrected.	<i>Appendix F: Wildfire Mitigation Activities & Cost Forecast—2026-2030</i>

Other Items to Include in a WMP from Various IPUC Orders

IPUC Order No. 36774, Case No. GNR-E-25-02

The following contains the IPUC's directives uniquely contained within Order No. 36774 related to Idaho Power's development of WMP filings and the content to be contained therein.

1. An update of lessons learned from the previously approved WMP within the annual filings for WMP review and approval.
 - a. An update of lessons learned is captured in Section 13.4. Lessons Learned.
2. A breakdown of each program category's forecasted costs by year for both capital and operations and maintenance (O&M) expenditures through the length of the WMP.
 - a. This information is included in Section 14. WMP Cost Summary and *Appendix F: Wildfire Mitigation Activities & Cost Forecast- 2026 to 2030*.
3. A section in which Idaho Power describes how it addresses each of the IPUC's orders and Staff's recommendations.
 - a. This information is contained within this Appendix D.
4. Rolling WMPs shall be developed with a minimum three-year planning horizon.
 - a. Idaho Power developed projections for a 5-year planning horizon, as presented within *Appendix F: Wildfire Mitigation Activities & Cost Forecast- 2026 to 2030*.
5. An explanation how the Company's line design methods reduce the potential for wildfire ignition, including a cost evaluation. This cost-evaluation need not be least-cost, least risk, but it must show how the mitigation project strikes the necessary "balance of mitigation costs with the resulting wildfire reduction in wildfire risk," as required by the WSCA.
 - a. This information is addressed within Section 3. Cost-Benefit Approach, Section 8. Methods of Line Design, and Section 14. WMP Cost Summary.
6. WMPs must include a cost-benefit analysis that justifies the expenditures for risk mitigation described within.
 - a. This information is included within Section 3. Cost-Benefit Approach. See also Section 14. WMP Cost Summary.

IPUC Order No. 36742, Case No. IPC-E-25-05

The following contains the IPUC's directives uniquely contained within Order No. 36742 related to Idaho Power's development of WMP filings and the content to be contained therein.

- (1) *List all pilot projects in the WMP, including the status of the pilot and an explanation of how the Company is evaluating least-cost, least-risk solutions.*

Pilot projects, including their status, have been identified in Section 10: Additional Preventative Actions and Programs. The company's approach to balancing mitigation costs with the resulting reduction of wildfire risks specific to pilot projects is discussed in Section 3.4. Idaho Power interprets the IPUC's direction to evaluate "least cost, least risk" solutions to direct the company to evaluate mitigations with an eye toward reasonably balancing the lowest cost mitigations against the greatest amount of wildfire risk reduction for that cost.

- (2) *Detail how the Company identifies, selects, and evaluates projects as least-cost, least-risk for line rebuilding, undergrounding, and covered conductor to be consistent with Idaho Code § 61-1803(3)(g), effective July 1, 2025.*

Idaho Power interprets the direction to evaluate "least-cost, least-risk" solutions to direct the company to evaluate mitigations that reasonably balance cost with the resulting reduction of wildfire risk. Put differently, Idaho Power understands the IPUC to direct the company to identify the reasonable intersection point between cost and risk reduction.

See Section: 3.2. Risk-Based Cost and Benefit Analysis of Wildfire Mitigation.

See also Sections 8.3 Transmission Line Rebuild Projects, 8.4.1. Overhead Primary Hardening Program, 8.4.2. Overhead to Underground Conversion, 8.4.3 New Underground Construction, and 10.2.4. Covered Conductor (Pilot).

- (3) *Add a section to the WMP to explain how the Company addressed Staff's recommendations and discuss other high-level major changes/updates to the WMP since the last filing.*

This Appendix D provides a crosswalk of the requirements stated in the WSCA and IPUC Order No. 36774 in Case No. GNR-E-25-02, as well as how the plan addresses the requirements contained within Order Nos. 36742, 36042, and 35717 in Case Nos. IPC-E-25-05, IPC-E-23-11 and IPC-E-22-27, respectively. A high-level discussion of the updates and changes since Idaho Power's last WMP filing is also contained herein.

IPUC Order No. 36042, Case No. IPC-E-23-11

Within the Company's IPUC-approved settlement stipulation to its 2023 general rate case, Idaho Power agreed that future iterations of its WMP would break down internal labor expenses for all WMP programs and to extend the WMP forecast to five years for each version. The Company also agreed to explore methods to reduce costs with communication and education regarding wildfire and PSPS.

Idaho Power has incorporated internal labor expense breakdowns for all WMP programs anticipated in 2026 in the 2026 filing. The company has also provided a five-year cost forecast in *Appendix F: Wildfire Mitigation Activities & Cost Forecast- 2026 to 2030*. Idaho Power continues to evaluate opportunities to reduce costs through enhanced communication and

education related to wildfire and PSPS, in part through the PSPS Event Management work discussed in Section 13.4.4 of the WMP.

IPUC Order No. 35717, Case No. IPC-E-22-27

The following contains the IPUC's directives contained within Order No. 35717 related to Idaho Power's development of WMP filings and the content to be contained therein.

- (1) Require the Company to detail relationships it has that may benefit the wildfire program, contribute to program costs, or provide for cost sharing opportunities in the WMP.*

This requirement was incorporated in the IPUC WMP Guidelines and is addressed by the company in various sections of the WMP, including Section 4.6. Wildfire Detection Cameras, Section 10.2.2. Fuels Reduction Shared Stewardship (Pilot), and Section 12. Government, Industry and Peer Utility Engagement.

- (2) Require the Company to provide details of all funding alternatives and sources pursued within the WMP.*

Idaho Power has pursued grant funding through the Idaho State Office of Energy and Minerals Resources (OEMR) and Department of Energy for grid modernization and resilience. Idaho Power continues to investigate and apply for funding opportunities.

Grant Name	WMP Project/Initiative	Awarding Agency	Awarded Amount (\$1,000)	Timeline	Status
Idaho Energy Resiliency Grant Program Round 1	Strategic Overhead to Undergrounding of overhead powerlines	OEMR/DOE	\$2,000	2025–2027	Active Project
Idaho Energy Resiliency Grant Program Round 2	Wildfire Situational Awareness Equipment-- Weather Stations, Cameras, line monitors	OEMR/DOE	\$1,499	2027	Under DOE Review

2026 WMP Major Updates/Changes

Below is a summary of the major updates and changes to Idaho Power's WMP since it was last filed with the IPUC on February 13, 2025, in Case No. IPC-E-25-05.

- With the passing of the WSCA and Montana Code Section 69-2-XX2¹, Idaho Power created this WMP specific to Idaho and Montana addressing the requirements contained within such newly created state statutes, as well as contemplating the nature thereof.

¹ Montana House Bill 490 (2025), Chapter No. 68. Title and codification subject to determination by the Montana Code Commissioner.

- The content of this WMP is largely consistent with the content of the WMP filed in February 2025; however, this version has been reorganized and streamlined for ease of understanding and compliance with the relevant laws and regulatory requirements. The discussions related to some mitigations have undergone minor alteration and clarification.
- The 2025 WMP covered Idaho Power’s operations in Oregon and Idaho. This WMP is specific to Idaho Power’s operations in Idaho and Montana.
- The cost benefit approach in Section 3 has been updated to more clearly describe Idaho Power’s process for ensuring a reasonable balance of mitigation costs with the resulting reduction of wildfire risk.
- Idaho Power separated construction-type practices from the inspection and asset management discussion. Construction-type mitigation practices are now discussed in Section 8. Methods of Line Design.
- The WMP contains a new Section 10. Additional Preventative Actions and Programs, which groups certain mitigations previously discussed in various other areas and presents all Idaho Power pilot programs in one location.
- The addition of a Lessons Learned section to Section 13. Performance Monitoring and Metrics.
- The addition of a new section—Section 14. WMP Cost Summary.
- The addition of Appendix D, which cross walks the requirements of the WSCA and Montana Code Section 69-2-XX2, as well as other regulatory requirements with where Idaho Power addressed such requirements within its WMP.
- The addition of Appendix E: Transmission Line Map Book that highlights the network of Idaho Power transmission lines.
- The addition of Appendix F: Wildfire Mitigation Activities & Costs Forecast 2026–2030, which forecasts program activities and costs for 2026 and the following four years.

Montana WMP Requirements

This Appendix D provides additional information specific to wildfire-related requirements in Montana.

Pursuant to Montana Code Section 69-2-XX2,² effective May 13, 2025, Idaho Power also filed this WMP with its statutory “approval authority,” as the appropriate body responsible for its corporate governance. Montana Code Section 69-2-XX2 establishes requirements for the WMP as to the Montana portion of this plan. The below crosswalk identifies where the plan meets Montana Code Section 69-2-XX2’s requirements.

² Montana House Bill 490 (2025). Title and codification subject to determination by the Montana Code Commissioner.

Montana Requirement—Montana Code 69-2-XX2	Corresponding Location in WMP
<i>Section 2 (2)(a) A wildfire mitigation plan must include description of areas in which the electric facilities provider has electric facilities or electric transmission and distribution activities that may be subject to a heightened risk of wildfire;</i>	Section 2. Geographical Risk Assessment <i>Appendix C: Wildfire Risk Zone Map Book</i> <i>Appendix E: Idaho Power Transmission Asset Mapping</i>
<i>Section 2 (2)(b) A wildfire mitigation plan must include a description of the strategies and programs that the electric facilities provider will use to inspect, maintain, repair, and operate its electric facilities;</i>	Section 4. Situational Awareness and Monitoring Section 5. Workforce Preparedness Section 6. Line Operations Practices Section 7. Infrastructure Inspection and Asset Management Section 8. Methods of Line Design Section 10. Additional Preventative Actions and Programs <i>Appendix A. Wildland Fire Preparedness and Prevention Plan</i>
<i>Section 2 (2)(c) A wildfire mitigation plan must include a description of the strategies and programs that the electric facilities provider will use to perform vegetation management;</i>	Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs Section 12: Government, Industry and Peer Utility Outreach <i>Appendix F: Wildfire Mitigation Activities & Cost Forecast—2026-2030</i>
<i>Section 2 (2)(d) A wildfire mitigation plan must include a description of the strategies for modifications or upgrades to electric facilities and preventative programs that the electric facilities provider will employ to reduce the risk of its electric facilities igniting a wildfire;</i>	Section 4. Situational Awareness and Monitoring Section 5. Workforce Preparedness Section 6. Mitigation Activity: Line Operations Practices Section 7. Infrastructure Inspection and Asset Management Section 8. Methods of Line Design Section 10. Additional Preventative Actions and Programs <i>Appendix A. Wildland Fire Preparedness and Prevention Plan</i> <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>Section 2 (2)(e) A wildfire mitigation plan must include a description of the strategies and methods for de-energizing power lines and modifying electric facility operations to mitigate potential wildfires taking into consideration the ability of the electric facilities provider to reasonably access the proposed electric facility to be de-energized, the balance of the risk of wildfire with the need for continued supply of electricity to a community, and any potential impact to public safety, first responders, and health and communications infrastructure;</i>	Section 6. Mitigation Activity: Line Operations Practices. <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>Section 2 (2)(f) A wildfire mitigation plan must include a description of the methods the electric facilities provider intends to use to restore its electrical system in the event systems are de-energized for the prevention of a wildfire;</i>	Section 6. Mitigation Activity: Line Operations Practices <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>

Montana Requirement—Montana Code 69-2-XX2	Corresponding Location in WMP
<i>Section 2 (2)(g) A wildfire mitigation plan must include a description of the estimated incremental costs associated with implementing the plan, including system improvements and upgrades for a regulated utility;</i>	Section 14. Wildfire Mitigation Cost Summary <i>Appendix F: Wildfire Mitigation Activities & Cost Forecast—2026-2030</i>
<i>Section 2 (2)(h) A wildfire mitigation plan must include a description of the community outreach and public awareness efforts before and during a wildfire season; and</i>	Section 11. Public Outreach and Engagement <i>Appendix B: Wildfire Public Safety Power Shutoff Plan</i>
<i>Section 2 (2)(i) A wildfire mitigation plan must include a description of the potential participation, if applicable, with state or local wildland fire protection plans or wildfire mitigation plans.</i>	Section 12. Government Engagement, Industry, and Peer Utility Engagement

Appendix E.

Idaho Power Transmission Line Map Book

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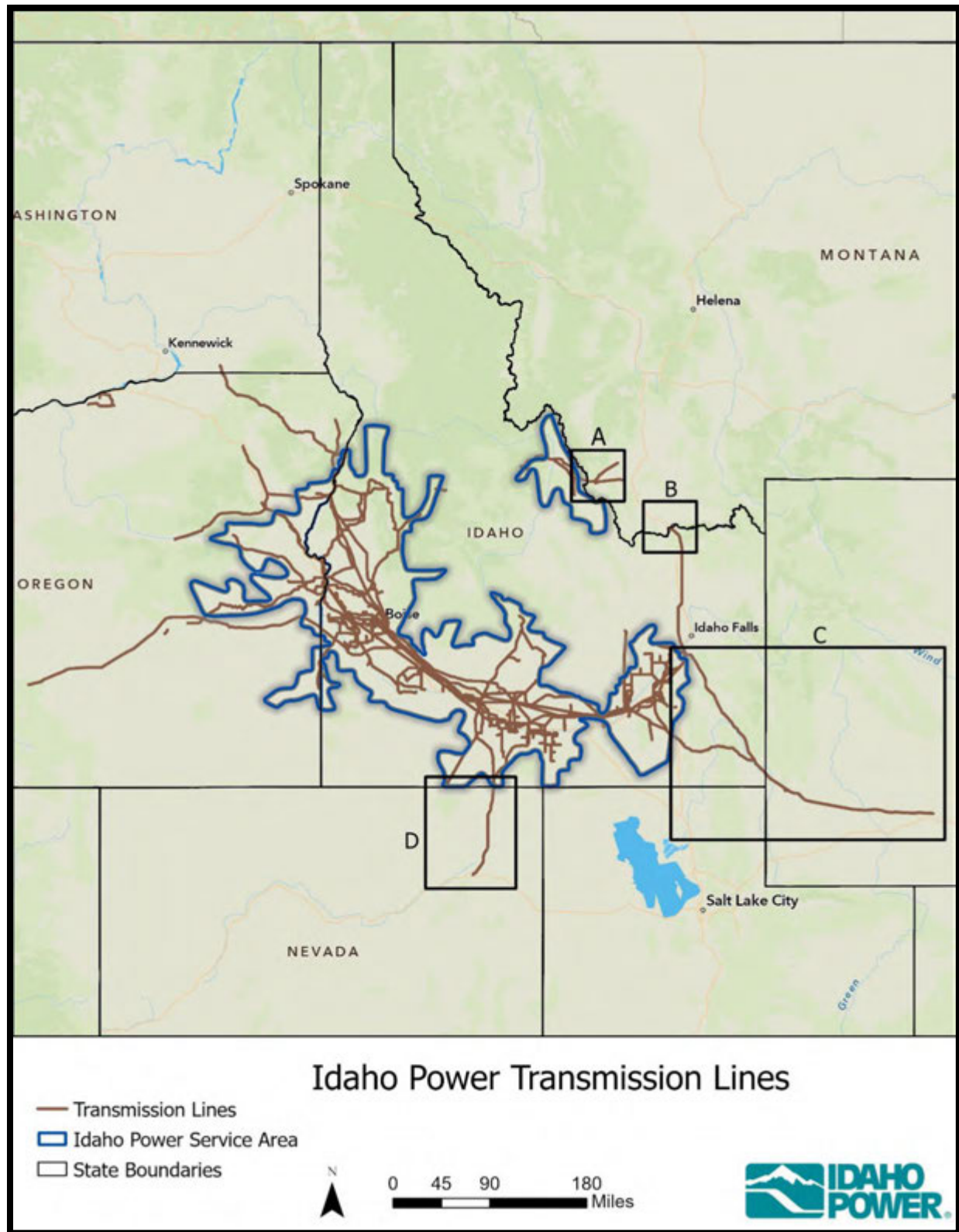


Figure 1
Idaho Power transmission lines

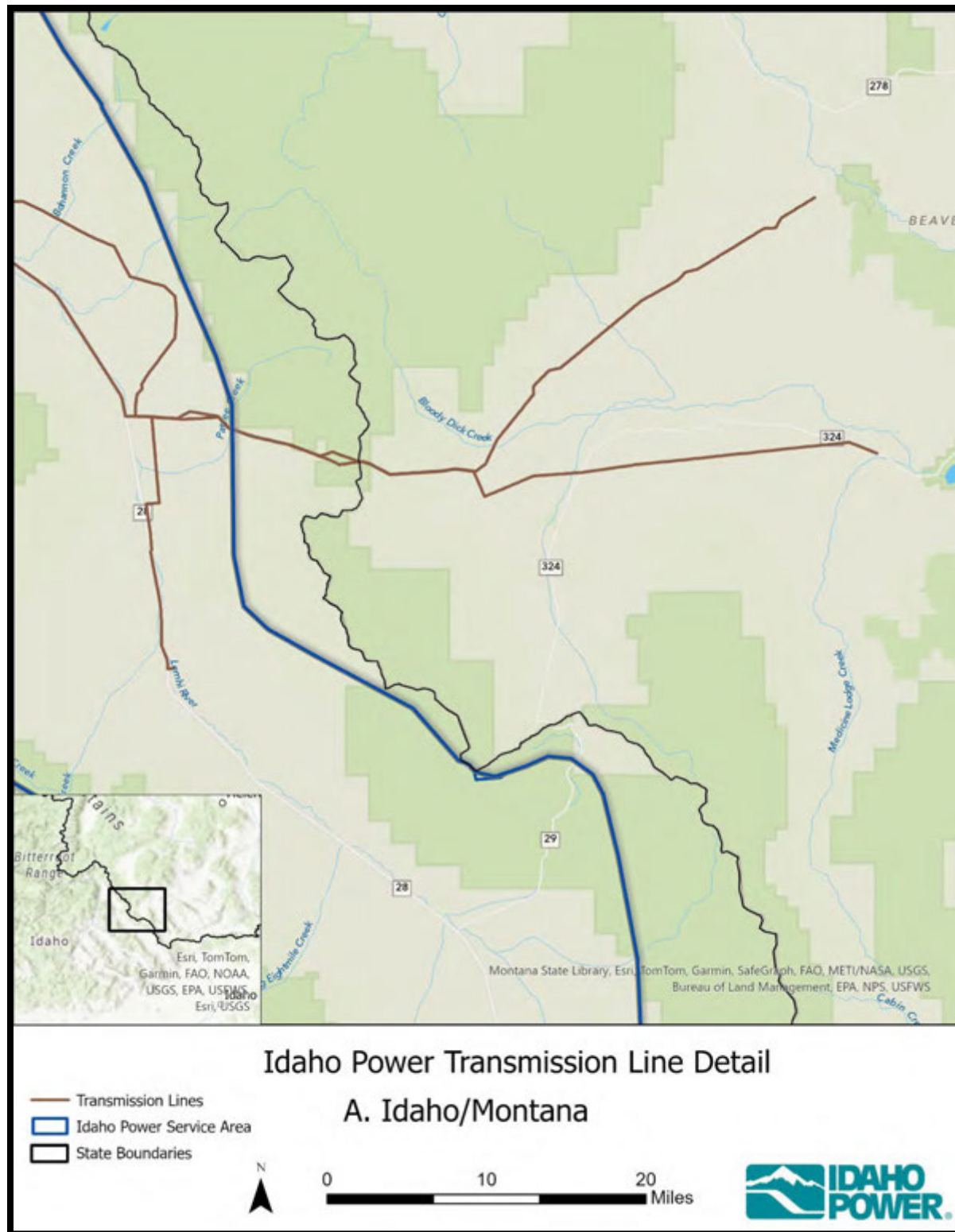


Figure 2
Idaho Power transmission line detail—A. Idaho/Montana

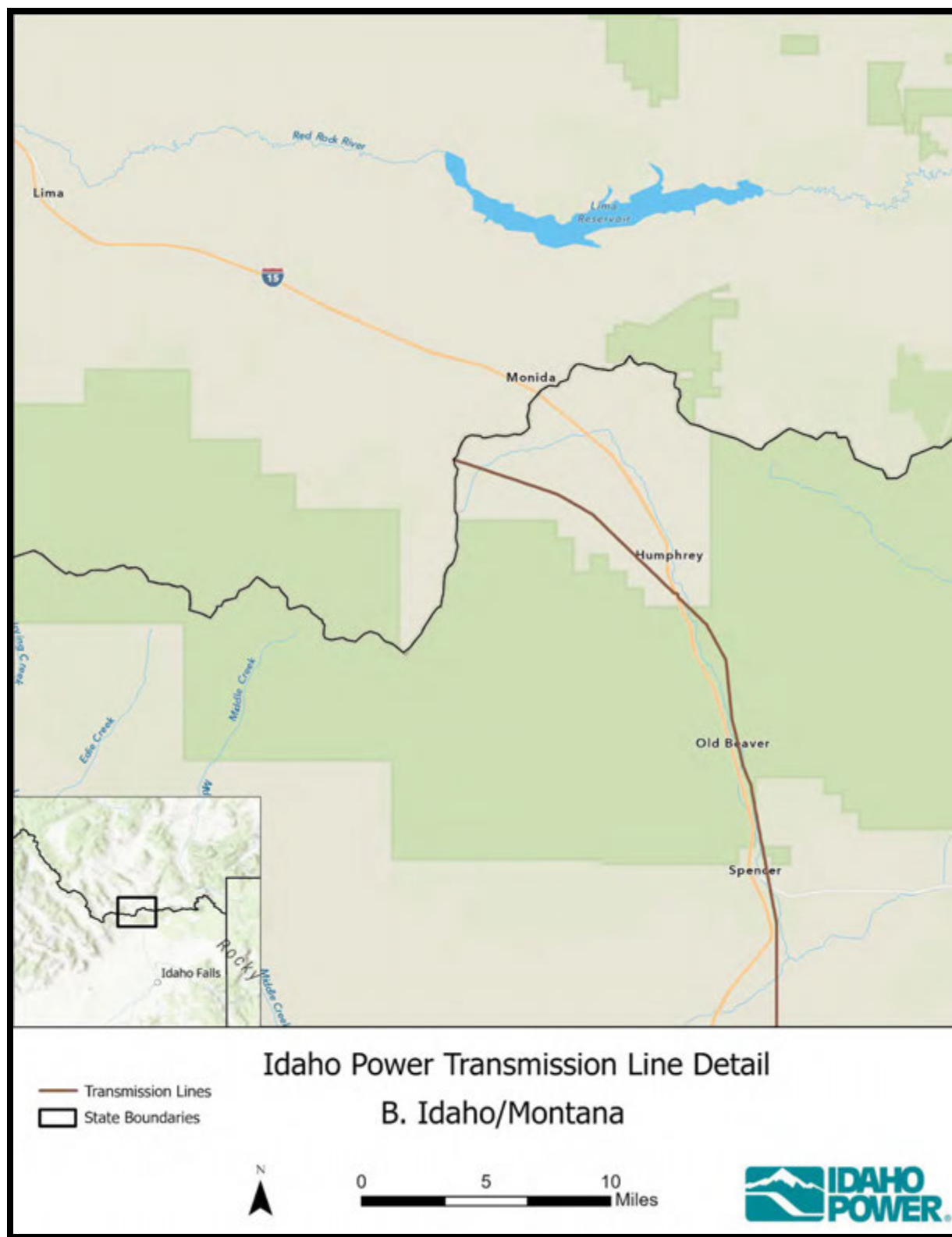


Figure 3
Idaho Power transmission line detail—B. Idaho/Montana

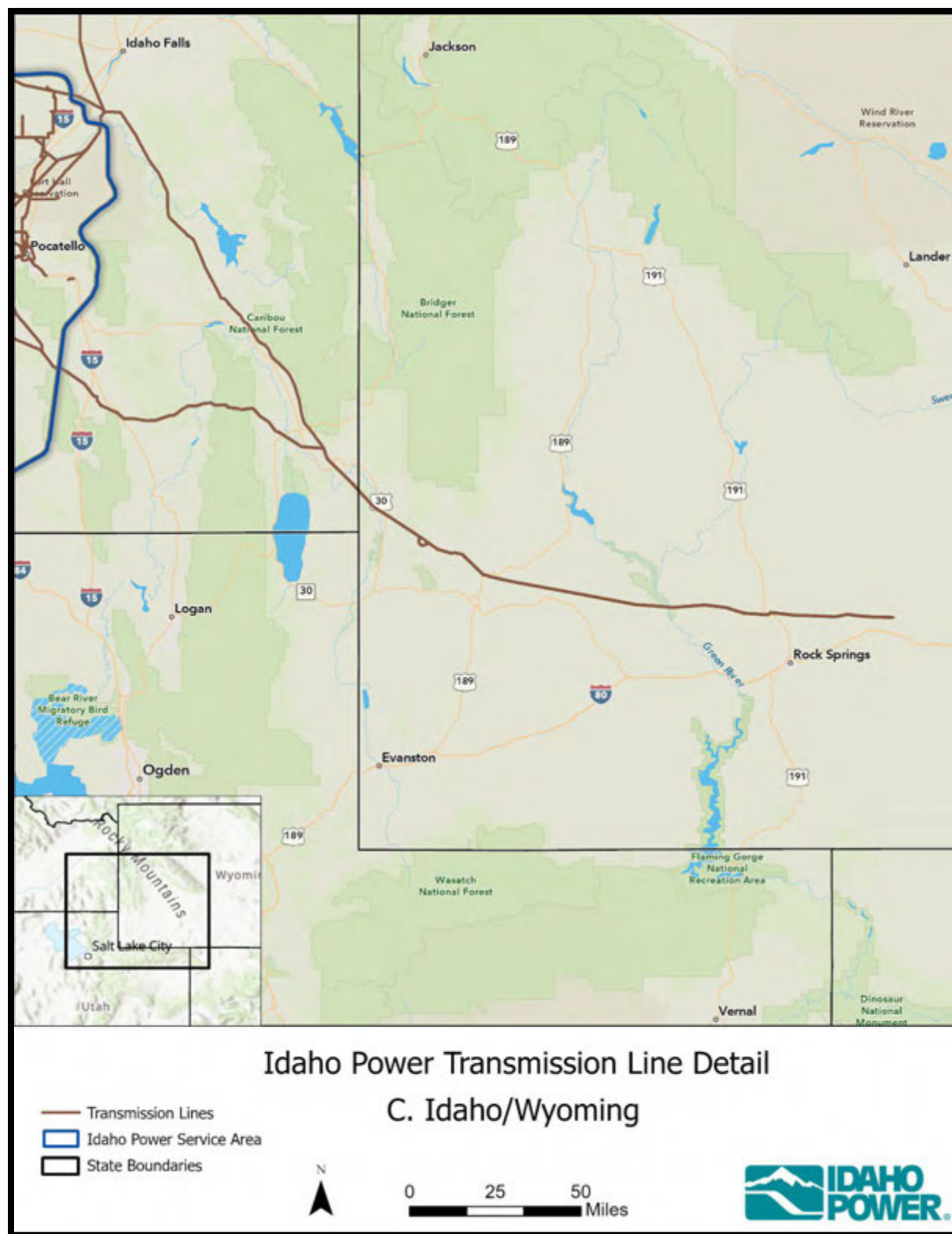


Figure 4
Idaho Power transmission line detail—C. Idaho/Wyoming

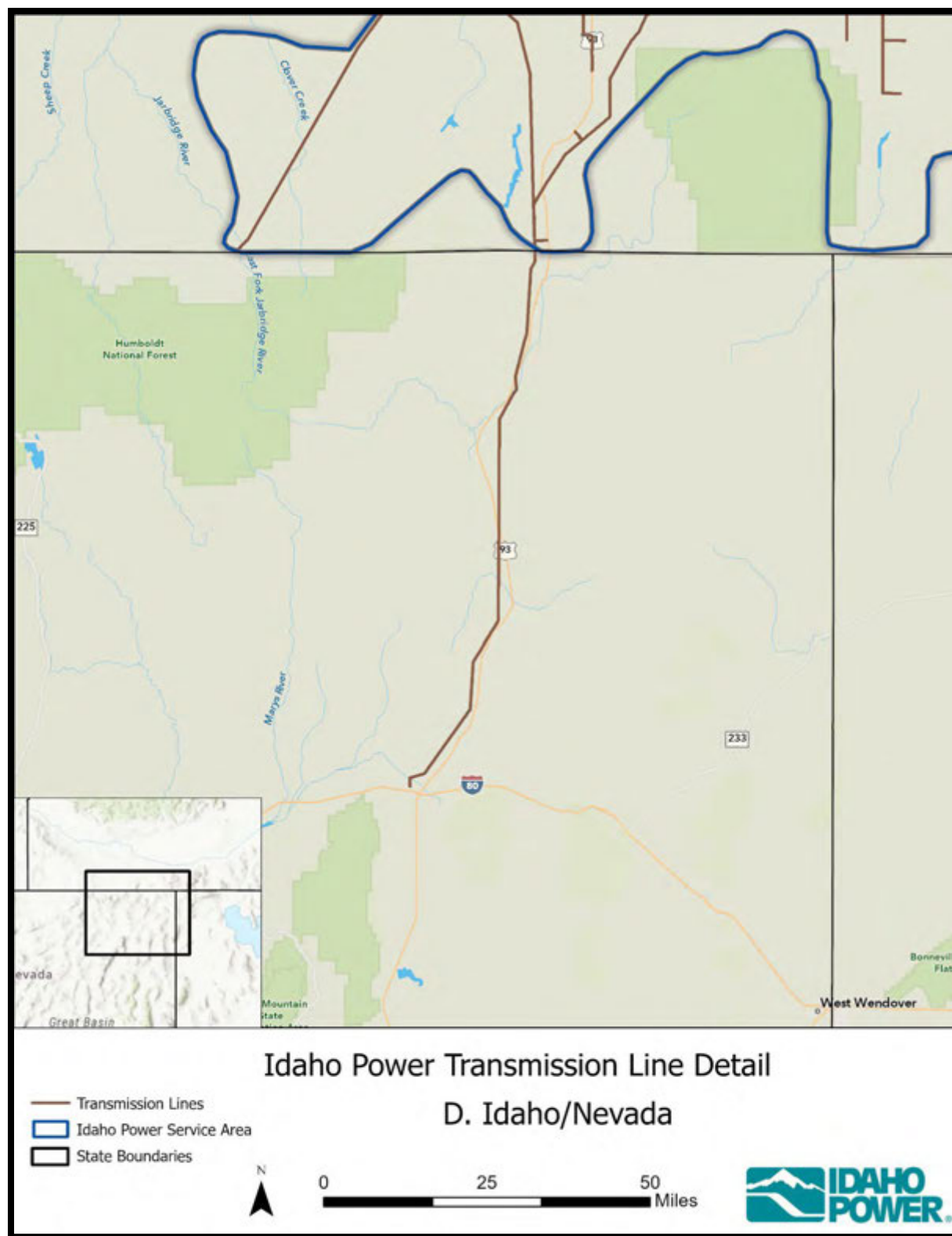


Figure 5
Idaho Power transmission line detail—D. Idaho/Nevada

Appendix F.

Wildfire Mitigation

Activities and Cost Forecast

2026–2030

October 2025

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Estimated O&M expenses for wildfire mitigation, \$000s (2026–2030)*

*As of October 1, 2025. These are best-known estimates at the time of this Wildfire Mitigation Program (WMP) filing and are subject to change. These numbers are provided only for the purpose of review and approval of this WMP pursuant to the Idaho *Wildfire Standard of Care Act* (WSCA). They should not be used for any other purpose.

Wildfire Mitigation Program Description	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
A. Geographical Risk Assessment					
Risk Modeling—Risk Maps, Fire Simulation, Probabilistic Model Development and Support	\$2,236	\$2,257	\$2,325	\$2,325	\$2,325
B. Situational Awareness and Monitoring					
Weather Forecasting—System development and support, data services, climatology	\$72	\$144	\$144	\$144	\$144
Weather Forecasting Personnel—Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS)	\$202	\$208	\$214	\$221	\$227
Weather Forecasting—Weather Station Maintenance	\$234	\$350	\$360	\$382	\$404
Pole Loading Modeling & Assessment (Contract service)	\$72	\$72	\$72	\$75	\$75
Wildfire Detection Cameras	\$254	\$322	\$349	\$349	\$349
C. Workforce Preparedness					
Tools/Equipment	\$34	\$10	\$10	\$5	\$5
International Wildfire Risk Mitigation Consortium	\$38	\$40	\$40	\$42	\$42
D. Infrastructure Inspection and Asset Management					
O&M Component of Capital Work	\$391	\$460	\$552	\$607	\$667
Annual O&M T&D Patrol Maintenance Repairs	\$187	\$761	\$761	\$784	\$706
Transmission Thermography Inspection Mitigation	\$48	\$48	\$48	\$48	\$48
Distribution Thermography Inspection Mitigation	\$48	\$48	\$48	\$48	\$48
Thermography Technician Personnel	\$165	\$170	\$175	\$180	\$185
Transmission Wood Pole Fire Resistant Wraps	\$250	\$250	\$250	\$250	\$250
Wildfire Mitigation Program Labor	\$1,194	\$1,523	\$1,630	\$1,679	\$1,730
Patrolmen for Wildfire Pre-Season Inspections in Wildfire Risk Zones	\$157	\$161	\$166	\$171	\$176
Covered Wire Evaluation—Pilot Program in PSPS Zones	\$14	\$0	\$0	\$0	\$0

Wildfire Mitigation Program Description	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
Drone Beyond Visual Line of Sight Waiver for PSPS Patrols	\$0	\$0	\$115	\$0	\$0
Aerial Drone Inspection Pilot	\$675	\$869	\$895	\$922	\$950
E. Vegetation Management					
Transition to/Maintain 3-year Vegetation Management Cycle (includes Enhanced Practices for Distribution Tier 3 & Tier 2 Risk Zones)	\$45,282	\$39,837	\$41,231	\$45,354	\$46,715
Internal Tree Trimming Crew	\$381	\$335	\$347	\$382	\$393
Line Clearing Personnel	\$198	\$204	\$210	\$217	\$223
Fuel Reduction Program	\$72	\$72	\$72	\$72	\$72
F. Public Outreach and Engagement					
Wildfire/Wildfire Mitigation Education/Communication—Advertisements, Bill Inserts, Meetings, Other & PSPS Customer Education/Communication—Advertisements, Bill Inserts, Other	\$164	\$164	\$164	\$164	\$164
Public meetings/event fees for PSPS engagement, maps, flyers	\$8	\$10	\$10	\$10	\$10
Community and Customer Engagement and Outreach	\$160	\$171	\$176	\$181	\$187
G. Line Operations Practices PSPS/Emergency Preparedness and Technology					
Communication/Alert Tool development (System set up, outage maps, critical facilities identification)	\$0	\$0	\$5	\$0	\$0
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$215	\$225	\$200	\$200	200
Fire Suppression Resources	\$183	\$188	\$194	\$200	\$206
Standby Helicopter Service	\$536	\$563	\$591	\$609	\$627
Community Resource Centers	\$5	\$5	\$5	\$5	\$5
Total	\$53,473	\$49,220	\$51,093	\$55,352	\$56,853

Table 2

Wildfire mitigation forecasted capital investments, \$000s, (2026-2030) *

Mitigation Program	Program Description	2026 Planned in Service	2027 Planned in Service	2028 Planned in Service	2029 Planned in Service	2030 Planned in Service
Overhead Primary Hardening Program	Systematic replacement and upgrades of hardware and equipment	\$19,500	\$21,700	\$24,500	\$42,140	\$48,035
Strategic Undergrounding	Select conversion of overhead to underground distribution in Tier 3 Risk Zones	\$12,000	\$12,000	\$12,000	\$18,000	\$18,000
Recloser Segmentation and Communication Upgrades	Installation, relocation, and expanded communication for automatic reclosing overcurrent protection devices	\$200	\$1,000	\$500	\$200	\$200
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	\$50	\$70	\$0	\$0	\$0
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	\$1,223	\$890	\$68	\$70	\$72
Total		\$32,973	\$35,660	\$37,068	\$60,410	\$66,307

*These are estimates only. The costs may increase or decrease due to such factors as inflation or scope changes. These numbers are provided only for the purpose of review and approval of this WMP pursuant to the WSCA. They should not be used for any other purpose.

Table 3

Wildfire mitigation plan asset inspection targets (2026–2030)*

Wildfire Mitigation Plan Asset Inspection Initiatives	2026 Goal	2027 Goal	2028 Goal	2029 Goal	2030 Goal
Transmission Inspections					
Wildfire Pre-Season Patrol—Tier 3 Risk Zones (Structures)	1,118	1,118	1,118	1,118	1,118
Infrared Thermography Patrol (Structures)	1,118	1,118	1,118	1,118	1,118
Distribution Inspections					
Wildfire Pre-Season Patrol—Tier 3 Risk Zones and select Tier 2 Risk Zones (Poles)	19,382	19,382	19,382	19,382	19,382
Infrared Thermography Patrol—Tier 3 Zones (Poles)	4,000	4,000	4,000	4,000	4,000

* The targets shown are based on the current number of poles and structures and on the contents of Idaho Power's 2026 WMP. They are subject to change in future WMPs.

Table 4

Distribution asset management and situational awareness targets (2026–2030)**

Initiative	Wildfire Mitigation Plan Activity	2026 Planned	2027 Target	2028 Target	2029 Target	2030 Target
Distribution System Hardening*	System Hardening (miles)	72	75	80	130	140
	Overhead Line Converted to Underground (miles)	20	20	20	25	25
Feeder Segmentation	Installation or Relocation of Automatic Reclosing Devices	5	24	12	4	4
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	2	2	0	0	0
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	55	38	3	3	3

*Excludes reliability improvement projects outside of wildfire risk zones

** The targets shown are based on the contents of Idaho Power's 2026 WMP. They are subject to change in future WMPs.

Table 5
2026–2030 vegetation management targets*

Wildfire Mitigation Plan Vegetation Management Initiatives	2026 Goal (ID)	2027 Goal (ID)	2028 Goal (ID)	2029 Goal (ID)	2030 Goal (ID)
Transition to a 3-Year Pruning Cycle (Circuits)	213	150	223	213	150
Annual Patrol—Tier 3 & Tier 2 Risk Zones (Circuits)	139	139	139	139	139
Annual Mitigation—Tier 3 & Tier 2 Risk Zones (Circuits)	139	139	139	139	139
Mid-Cycle Patrols—Tier 3 & Tier 2 Risk Zones (Circuits)	15	46	46	15	46
Mid-Cycle Pruning—Tier 3 & Tier 2 Risk Zones (Circuits)	15	46	46	15	46
Identified Hazard Trees Pruned	100% of all identified	100% of all identified	100% of all identified	100% of all identified	100% of all identified
Identified Hazard Trees Removed	100% of all identified	100% of all identified	100% of all identified	100% of all identified	100% of all identified
Audits of Pruning Activities—Tier 3 & Tier 2 Risk Zones (Worksites)	100% of all identified	100% of all identified	100% of all identified	100% of all identified	100% of all identified

*Idaho Power strives to meet the targets identified herein but may not meet them in all cases. The targets shown are based on the contents of Idaho Power’s 2026 WMP. They are subject to change in future WMPs.