IDAHO & MONTANA

2027 WILDFIRE MITIGATION PLAN











WMP

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Idaho and Montana 2027 Wildfire Mitigation Plan

Updated October 1, 2026

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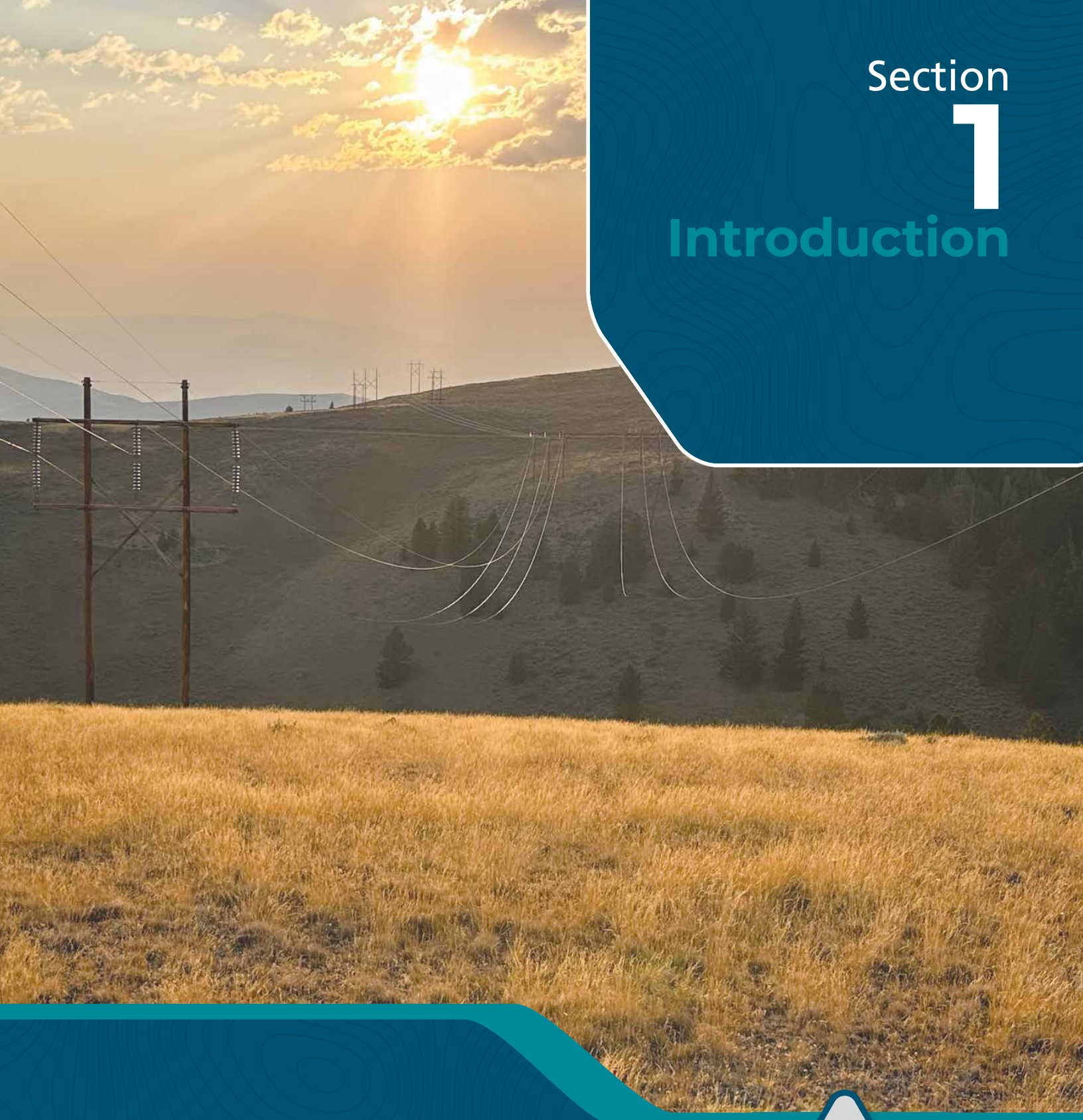
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Section

1

Introduction

1. Introduction

1.1. Overview

Idaho Power is focused on the safety of its customers and communities and 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. While Idaho has not experienced wildfires of the same magnitude as some other western states, [1] warmer temperatures, reduced snowpack, and earlier snowmelt contribute to drier conditions, impacting the period of heightened wildfire 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 Resources and Conservation 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).

[1] Wildland Fire Summaries 2019-2025. https://www.nifc.gov/fire-information/statistics Accessed May 28, 2026.
[2] Western Fire Chiefs Association. *Idaho Fire Season: In-Depth Guide | WFCA* Accessed May 28, 2026.
[3] News Release: Idaho Department of Lands Extends Closed Fire Season Due to Persistent Wildfire Risks/News Release: Idaho Department of Lands Extends Closed Fire Season Due to Persistent Wildfire Risks

The company serves more than 660,000 customers, approximately 640,000 of which reside in Idaho. [4]

[4] On June 30, 2026, Idaho Power applied to the Idaho Public Utilities Commission for an order approving a proposed sale and transfer of Idaho Power's Oregon retail service territory to Oregon Trail Electric Consumers Cooperative (OTEC). At the time of this WMP's submission to the Idaho Public Utilities Commission, the proceeding concerning the transaction between Idaho Power and OTEC remains ongoing in Case No. IPC-E-26-21.

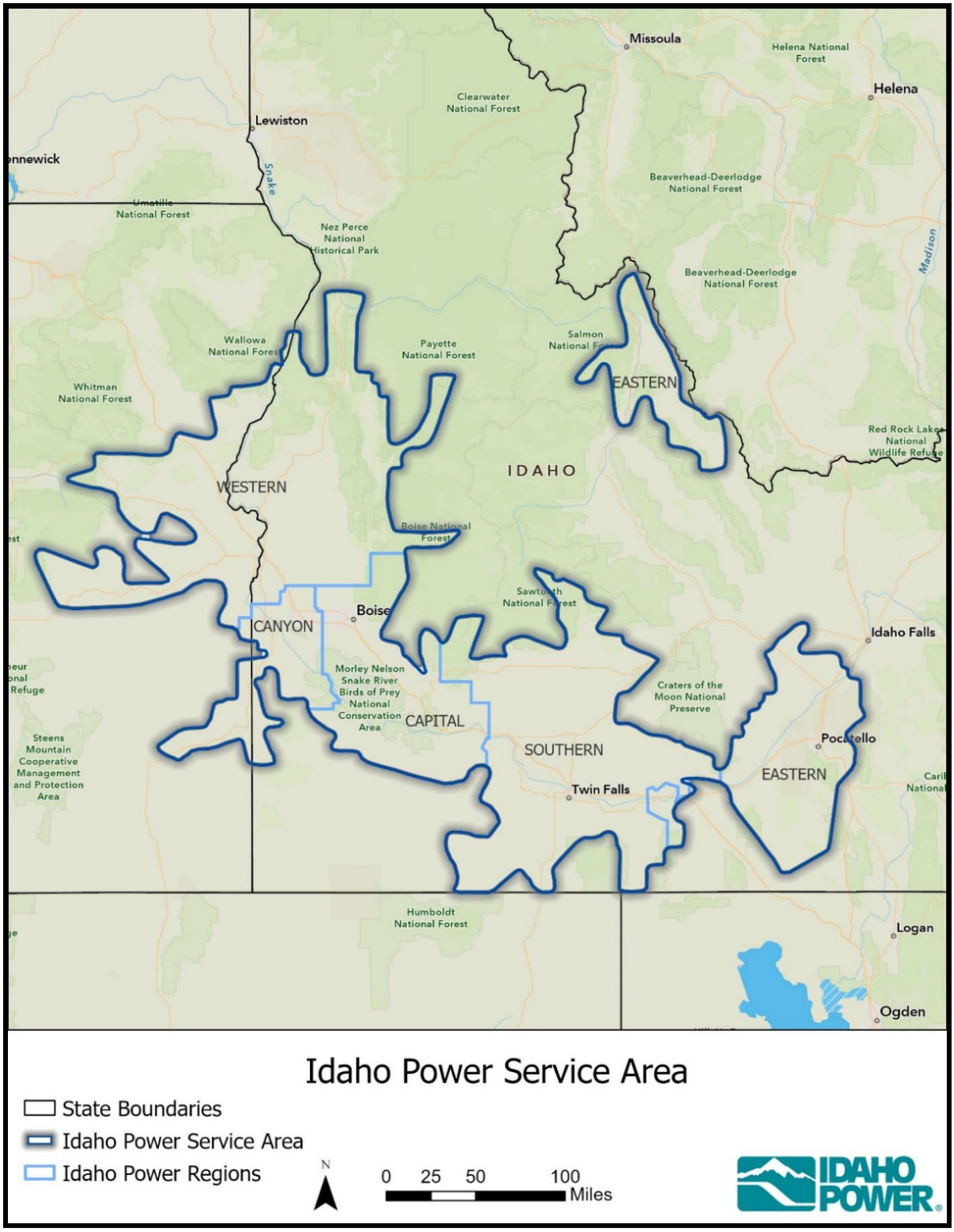


Figure 1
Idaho Power service area

1.4. Asset Overview

Idaho Power delivers electricity to customers via 258 substations, approximately 4,661 miles of overhead transmission[5] lines, and approximately 19,295 miles of overhead distribution lines. Approximately 80% of Idaho Power's transmission line assets are in Idaho and approximately 1% are in Montana. Roughly 89% of Idaho Power's distribution line assets are in Idaho. Table 1 summarizes the overhead powerline asset information by state.

[5] Refers to all lines at or above 46kV unless otherwise noted.

Table 1
Overhead transmission and distribution line mileage and substations by state*

Asset—OH** Line Miles	Total	Idaho		Oregon		Montana		Nevada		Wyoming	
	Line Miles	Line Miles	%	Line Miles	%	Line Miles	%	Line Miles	%	Line Miles	%
46 kV Transmission Lines	368	368	100.0%		0.00%						
69 kV Transmission Lines	1,022	670	65.5%	303	29.6%	49	4.8%				
115 kV Transmission Lines	3			3	100.0%						
138 kV Transmission Lines	1,452	1,245	85.7%	142	9.8%			65	4.5%		
161 kV Transmission Lines	85	85	100.0%		0.00%						
230 kV Transmission Lines	1,148	933	81.3%	215	18.7%						
345 kV Transmission Lines	472	362	76.7%		0.00%					110	23.30%
500 kV Transmission Lines	100	52	52.0%	48	48.0%						
Total OH Transmission Lines	4,650	3,715	79.9%	711	15.3%	49	1.10%	65	1.40%	110	2.40%
Total OH Distribution Lines	19,288	17,199	89.2%	2,089	10.8%						
Total OH Line Miles	**23,938**	**20,914**	**87.4%**	**2800**	**11.7%**	**49**	**0.20%**	**65**	**0.30%**	**110**	**0.50%**

Asset—Substations	Total	Idaho		Oregon		Montana		Nevada		Wyoming	
	Substations	Substations	%	Substations	%	Substations	%	Substations	%	Substations	%
Total # Substations	**258**	**227**	**88.00%**	**29**	**11.2%**	**1**	**0.4%**	**1**	**0.4%**	**0**	**0**

*OH line miles contained in this table are approximate and encompass Idaho Power-owned lines. Further, the total number of substations includes Idaho Power-owned facilities and excludes cogen, interconnects, and generation facilities.

** OH refers to overhead lines.

1.5. Legal and Regulatory Context

As required by the Wildfire Standard of Care Act (WSCA), Idaho Code § 61-1801 et seq., with respect to the Idaho portion of the plan, Idaho Power has filed for approval of this Idaho and Montana 2027 WMP with the Idaho Public Utilities Commission (IPUC). Idaho Code § 61-1803 codifies the specific elements required to be documented within a WMP. The IPUC has also issued orders governing filing requirements for Idaho Power's WMP as detailed in Appendix D. This WMP complies with all applicable requirements.

Further, pursuant to Montana Code Section 69-2-302, Idaho Power intends to file this WMP with its statutory "approval authority," as the appropriate body responsible for its corporate governance. Montana Code Section 69-2-302 establishes requirements for the WMP as to the Montana portion of this plan.

While Idaho Power's inaugural WMP, covering the company's Idaho and Oregon service areas, was submitted to the IPUC in 2021, Idaho Power filed its first Idaho and Montana 2026 WMP pursuant to the WSCA with the IPUC on October 10, 2025. With respect to the Idaho portion of this plan, Idaho Power's Idaho and Montana 2026 WMP was approved by the IPUC on April 14, 2026, through Order No. 37004. Additionally, Idaho Power's Idaho and Montana 2026 WMP was submitted and approved in accordance with Montana Code Section 69-2-302, with final approval occurring on May 20, 2026.

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, reflect the size and complexity of Idaho Power's operations, and consider the specific wildfire 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 zones 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 Powerline Safety Settings (EPSS);

- Asset management and inspection programs;
- System hardening and other line design strategies;
- Vegetation management around electric infrastructure;
- 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 2027. 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 2027. 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 wildfire risk mitigation begins with assessing geographic wildfire risk through both quantitative and qualitative methods. These assessments identify geographic areas where Idaho Power has infrastructure or equipment the company considers may be subject to a heightened risk of wildfire. These areas are identified as wildfire risk zones, and mitigation programs and actions are prioritized for those areas.

2.2. Identifying Areas of Heightened Wildfire Risk

Idaho Power's identification of heightened areas of wildfire risk begins with its understanding of the concepts underlying the assessment.

Wildfire risk is the potential for wildfire hazard to impact values within a geographic area.

Values are resources (natural) and assets (human-made). Wildfire risk exists only when wildfire hazard has the potential to impact values. Therefore, Idaho Power's understanding of wildfire risk is consistent with conventional definitions of risk—an event's probability multiplied by its potential negative consequences or impacts should that event occur as illustrated in Figure 2. Conversely, **wildfire hazard** refers to the likelihood and potential intensity of wildfire, regardless of the presence of values at risk. Idaho Power's geographic risk assessment considers wildfire risk and wildfire hazard in developing its wildfire risk zones.

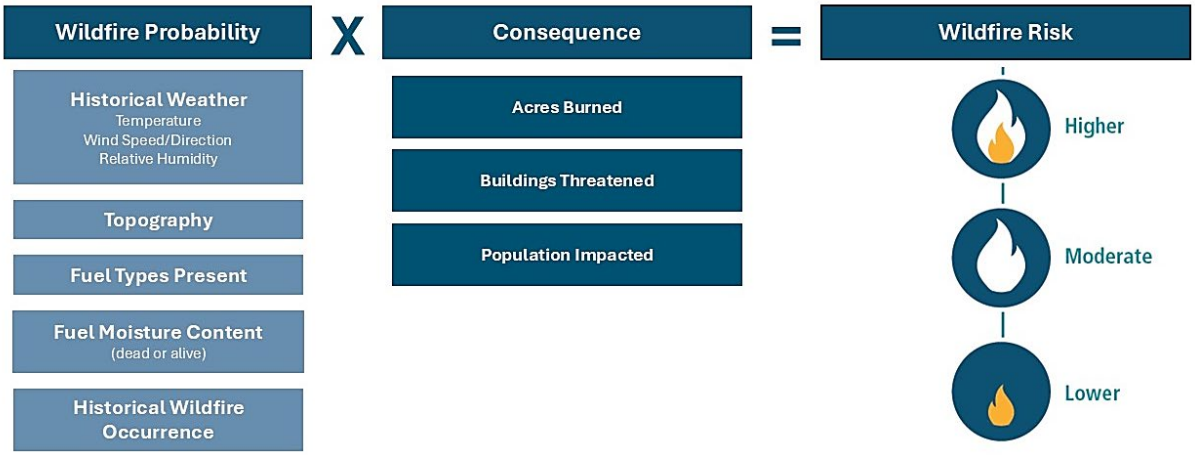


Figure 2
Wildfire risk-based methodology

Each component is defined as follows:

- **Wildfire Probability**. Wildfire probability evaluates whether the landscape is conducive to ignition and spread (i.e., whether the landscape can support an ignition). For purposes of Idaho Power's wildfire risk assessment, modeled wildfire volume (i.e., spatial integral of wildfire area and flame length) serves as a proxy measure for wildfire probability and potential growth. Data inputs used in the fire spread model to determine the wildfire volume include historical weather, historical wildfire occurrence, topography, fuel type, and fuel moisture content.

- **Consequence**. Estimation of potential wildfire impacts under fire spread simulations to specific values, such as residences, population, and acreage.

- **Wildfire Risk**. As discussed above, wildfire risk is wildfire probability multiplied by the consequence. The highest wildfire risk areas are those where both the wildfire probability and consequence are elevated. Combinations of low wildfire probability and elevated consequence, or elevated wildfire probability and low consequence, typically indicate lower wildfire risk.

The company's geographic risk modeling focuses on overhead transmission and distribution (T&D) facilities. Consistent with the WSCA, these facilities are infrastructure or equipment the company considers may be subject to a heightened risk of wildfire given their location in areas where underlying vegetation and landscape conditions may influence wildfire ignition and spread.[6] Utility facilities such as power plants, substations, power storage facilities, and office buildings do not have the same locational considerations and therefore are not specifically analyzed in Idaho Power's geographic modeling process. However, power plants, power storage facilities, and substations are typically interconnected with transmission and distribution lines. This means that, when the interconnection point is located over areas that the risk modeling software perceives as susceptible to wildfire ignition and spread, they are indirectly reflected in Idaho Power's geographic risk assessment.

Recognizing that wildfire risk is inherently dynamic, Idaho Power evaluates, and, where appropriate based on its analysis, updates its geographic risk assessment annually to reflect changing conditions and emerging information.

2.2.1. Wildfire Risk Model Processes

As part of its wildfire risk-modeling process, Idaho Power works with external consultants that specialize in assessing and quantifying utility-related wildfire risk.

Beginning in 2026, Idaho Power began the transition process of updating its identification of geographical areas of heightened wildfire risk from those identified using a prior geospatial

[6] Though "wildfire" is not defined in the WSCA, entities that specialize in firefighting typically define wildfire in relation to the area in which the fire burns—specifically the "wildland".

wildfire risk model to those identified using a new geospatial wildfire risk model—Technosylva. This transition maintains consistency with the company's overall wildfire risk framework while using the data and analytics available through Technosylva. Idaho Power intends this transition to be iterative. Thus, for 2027, Idaho Power has maintained its existing geographic identifications of areas of heightened wildfire risk (its existing wildfire risk zones) and added certain additional areas of identified heightened wildfire risk. Idaho Power intends to utilize the data and analytics available through Technosylva to continue refining its identification of geographic areas of heightened wildfire risk in areas where it has assets and equipment, which may result in changes to Idaho Power's wildfire risk zones in future WMPs.

2.2.1.1. Wildfire Risk Zone Development Process

The processes by which Idaho Power arrived at 1) the development of its existing wildfire risk zones and 2) the 2027 wildfire risk zone modifications are described in detail below.

2.2.1.2. Wildfire Risk Modeling Process Prior to 2027

The geospatial wildfire risk model outputs originally received by Idaho Power that form the basis for Idaho Power's continued wildfire risk zones were developed using 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 (30 meter/ approximately 100 feet) fuel rasters for use in fire spread modeling.[7]
4. The data developed above (WRF climatology, live fuel moisture, and LANDFIRE data) was used to drive a Monte Carlo[8] 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 T&D lines (i.e., 120 m on either side). The model used equal ignition

7 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). https://doi.org/10.1016/j.firesaf.2017.04.014

8 Ibid.

probability for all overhead distribution and transmission asset types.[9] 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 geographic information system (GIS)based data depicting wildfire risk was developed. This risk was then illustrated using GIS-based wildfire risk maps.

2.2.1.3. Wildfire Risk Zone Establishment Process Prior to 2027

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 the 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. This consideration process is detailed in Figure 3.

9 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.

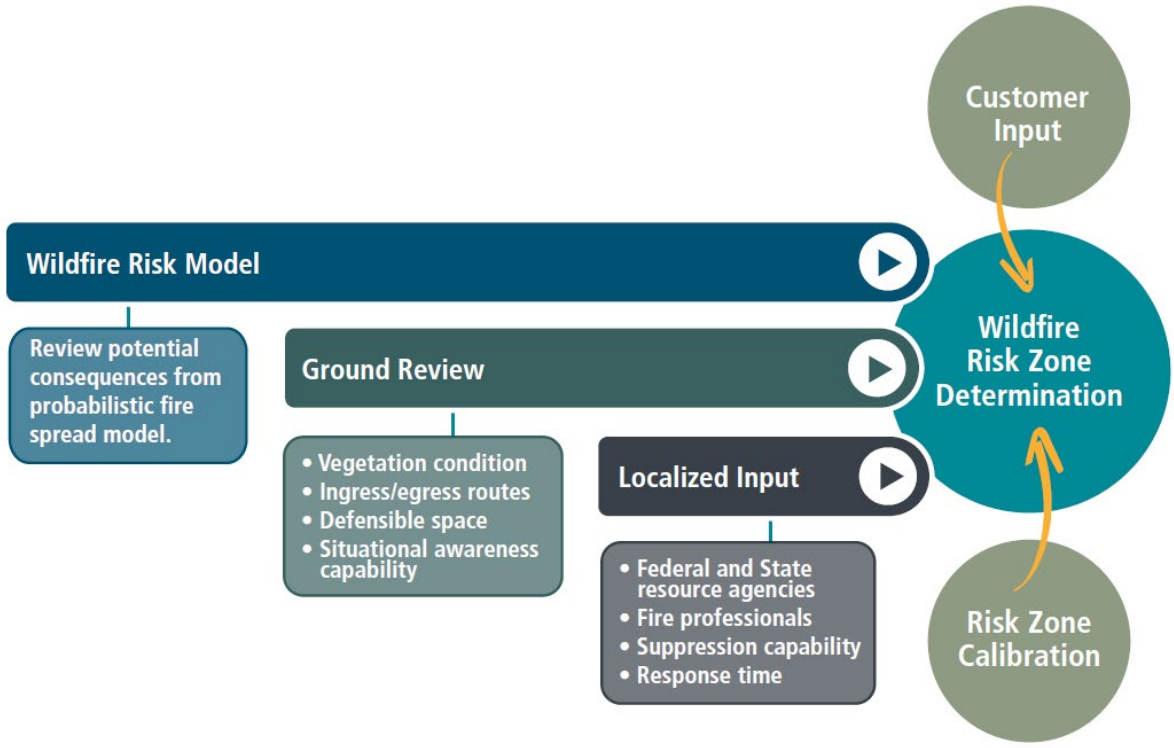


Figure 3
Risk zone evaluation and determination process prior to 2027

Idaho Power also considered learnings gained from attending Local Emergency Planning Committee meetings related to suppression capabilities, ingress/egress routes, and localized factors that may influence fire regime, as well as learnings from peer utilities in developing its continued wildfire risk zones.

2.2.2. 2027 Wildfire Risk Zone Modeling and Validation

2.2.2.1. New Geospatial Risk Model

Idaho Power has begun the process of transitioning to Technosylva's *Wildfire Risk Analyst Enterprise (*WFA-E*)* platform using Technosylva's FireSight consequence model output for its new geospatial wildfire risk model.

FireSight performs millions of wildfire simulations under a broad range of historical weather and fuel conditions to estimate potential wildfire behavior and consequences.
These simulations estimate the potential impacts associated with an ignition occurring at specific utility assets at the feeder, sub-feeder, and segment level. The FireSight consequence model outputs received by Idaho Power are developed using the following major steps:

1. A 20-year historical fire weather climatology was developed using the 600 most significant fire weather days occurring between 2004 and 2024 to represent the range and frequency of wildfire-conducive weather conditions across Idaho Power's service area. Weather conditions were modeled at a 2 kilometer (km) spatial resolution.
2. Projected future vegetation and fuel conditions representing the year 2030 were incorporated using LANDFIRE-derived fuel datasets at a 30 m spatial resolution.
3. Exposure modeling included supplemented Microsoft Buildings footprint data and OpenStreetMap (OSM) data to represent estimates of potential structure impacts.
4. Fire spread potential was modeled for overhead transmission and distribution infrastructure using ignition locations placed at approximately 100-m intervals along utility assets.
5. Fire behavior simulations were conducted using an eight-hour fire duration. Each simulation represents a unique combination of specific input conditions, including wind speed, wind direction, fuel moisture, temperature, and relative humidity. Simulations were initiated at 2 p.m. Mountain Time to approximate the period of the day when fire behavior is often most active within Idaho Power's service area.
6. Hundreds of fire spread simulations were performed for each ignition location to characterize the range of potential wildfire outcomes. This approach captures the variability associated with weather conditions and landscape characteristics.
7. FireSight outputs and risk metrics were processed, both as normalized composite risk indices and underlying raw values associated with various weather percentiles. Composite risk scores were based on the 90th percentile weather scenarios based on a 20-year climatology, representing, on average, approximately 11 annually significant fire weather days per year.
8. The resulting analysis produces metrics that provides estimated quantification of the potential consequences of a wildfire, assuming an ignition occurs at a specific location with an equal probability of ignition across all assets. These metrics serve as a function of fire spread potential (deterministic fire spread model) and consequence and thus help to answer the question: "If a wildfire starts at this location, what could happen?"

Because these metrics focus on wildfire impacts independent of asset condition or ignition likelihood, they provide a consistent and stable measure of wildfire risk associated with a geographic area. These factors largely remain consistent over time and give a sense of the potential consequences of wildfire for long-term planning purposes.[10] This allows Idaho Power to avoid the constant fluctuations that would result from incorporating asset condition, which changes as assets are repaired, replaced, or hardened, when assessing geographic wildfire risk.

[10] While asset condition, inspection results, and equipment performance are important inputs to Idaho Power's WMP, the company considers these factors more appropriately within mitigation prioritization and investment decision-making rather than geographic risk identification. See Sections 3, 7, and 8 for discussions that address these factors.

Idaho Power then used the Immediate Impacts Composite, a metric created by Technosylva and derived from the above processes that aggregates buildings threatened, population impacted, and acres burned in a given fire spread simulation, to identify possible areas for further review. More specifically, areas identified as exceeding the 95th percentile of the Immediate Impacts Composite were identified for further evaluation and possible zone modifications via the process described below.

2.2.2.2. Model Validation

Model validation and quality assessment completed by Reax Engineering[11] and Technosylva[12] involves assessing the performance of fire spread models.

2.2.3. 2027 Wildfire Risk Zone Modification Process

Using the modeling processes described in section 2.2.2, Idaho Power identified possible areas of zone modifications for further review.

The possible areas for modification were then reviewed for concurrence with nationally available fire history datasets, including the National Interagency Fire Center (NIFC) Wildland Fire Interagency Geospatial Services (WFGIS) Incident Points and Perimeters[13] and Monitoring Trends in Burn Severity.[14] Wildfire risk characterization was further validated through comparison with existing federal, state, and local risk assessments, including the United States Department of Agriculture (USDA) Forest Service *Wildfire Risk to Communities*[15] products, the Idaho Forest Action Plan[16] Fire Hazard Assessment[17], and local county-wide Community Wildfire Protection Plans (CWPP), such as those developed for Elmore[18] and Valley[19] counties.

[11] Lautenberger, Chris. 2013. Wildland fire modeling with an Eulerian level set method and automated calibration. Fire Safety Journal, Volume 62, Part C, 2013, Pages 289-298, ISSN 0379-7112, https://doi.org/10.1016/j.firesaf.2013.08.014.

[12] Cardil A, Monedero S, SeLegue P, Navarrete MÁ, de-Miguel S, Purdy S, Marshall G, Chavez T, Allison K, Quilez R, Ortega M, Silva CA, Ramirez J. 2023. Performance of operational fire spread models in California. International Journal of Wildland Fire 32, 1492 –1502 .

[13] National Interagency Fire Center. WFIGS Fire History Location and Perimeter Services. ArcGIS HUB, WFIGS Fire History | Wildland Fire Interagency Geospatial Services.

[14] USGS EROS and the United States Department of Agriculture, Forest Service GTAC. Monitoring Trends in Burn Severity (MTBS). https://www.mtbs.gov/ .

[15] Scott, Joe H.; Dillon, Gregory K.; Jaffe, Melissa R.; Vogler, Kevin C.; Olszewski, Julia H.; Callahan, Michael N.; Karau, Eva C.; Lazarz, Mitchell T.; Short, Karen C.; Riley, Karin L.; Finney, Mark A.; Grenfell, Isaac C. 2024. Wildfire Risk to Communities: Spatial datasets of landscape-wide wildfire risk components for the United States. 2nd Edition. Fort Collins, CO: Forest Service Research Data Archive. https://doi.org/10.2737/RDS-2020-0016-2

[16] Idaho Forest Action Plan: Resource Assessment – July 2020. FINAL_2020-FAP-Resource-Assessment_09-03-20.pdf. https://www.idl.idaho.gov/about-forestry/shared-stewardship/forest-action-plan/

[17] Idaho Department of Lands. Fire Hazard 2025 | No Boundaries Forestry. ArcGIS online. https://gis1.idl.idaho.gov/portal/apps/sites/#/ssdata/maps/e43a616a03994d4c802f6c05cf6394a7/explore?location=45.192191%2C-114.630074%2C7.05&path=

[18] Elmore County. Elmore County Hazard Mitigation Plan, 2020. https://elmorecounty.org/wp-content/uploads/2022/02/elmore-county-hmp-cwpp-2020-2021-update-final-draft.pdf

[19] Valley County. Valley County Community Wildfire Protection Plan 2025. https://www.valleycountyid.gov/departments/Wildfire/CommunityWildfireProtectionPlan

The resulting output was used to identify areas for targeted ground review. As with the development of wildfire risk zones through 2026, Idaho Power relied on ground review and subject-matter expert feedback to further refine and identify targeted modifications to Idaho Power's existing wildfire risk zones.

Figure 4 summarizes the processes used to establish Idaho Power's 2027 wildfire risk zone modifications.

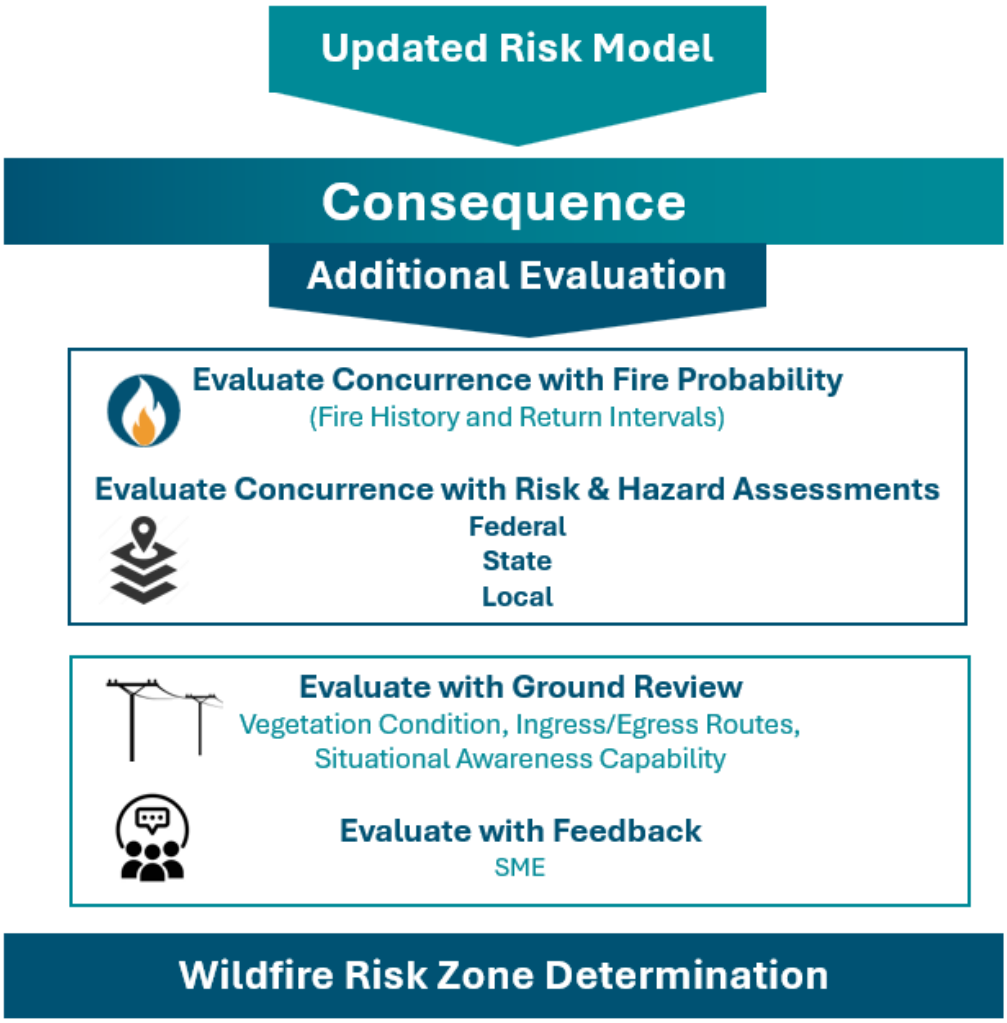


Figure 4
Risk zone evaluation and determination process

2.3. Idaho Power's 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 geographic/landscape 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 5 is illustrative of Idaho Power's Tier 2 and Tier 3 wildfire risk zones (the continuing wildfire risk zones with the 2027 modifications) that will be utilized in 2027 located in Idaho. Both of Idaho Power's geographic risk assessment processes described above 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, including 2027 modifications 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.[20]

Table 2
Idaho Power's overhead transmission and distribution lines by risk zone in Idaho and Montana

Idaho Power's overhead transmission and distribution lines by risk zone in Idaho & 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)	3,715	363	10%	279	8%	84	2%
Transmission Lines (MT)	49	0	0%	0	0%	0	0%
Distribution Lines (ID)	17,199	1,716	10%	997	6%	719	4%
Distribution Lines (MT)	-	-	-	-	-	-	-
Total Line Miles	20,963	2,079	10%	1,276	6%	803	4%

*Except when otherwise indicated, total line mile counts in this WMP 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 2027.

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

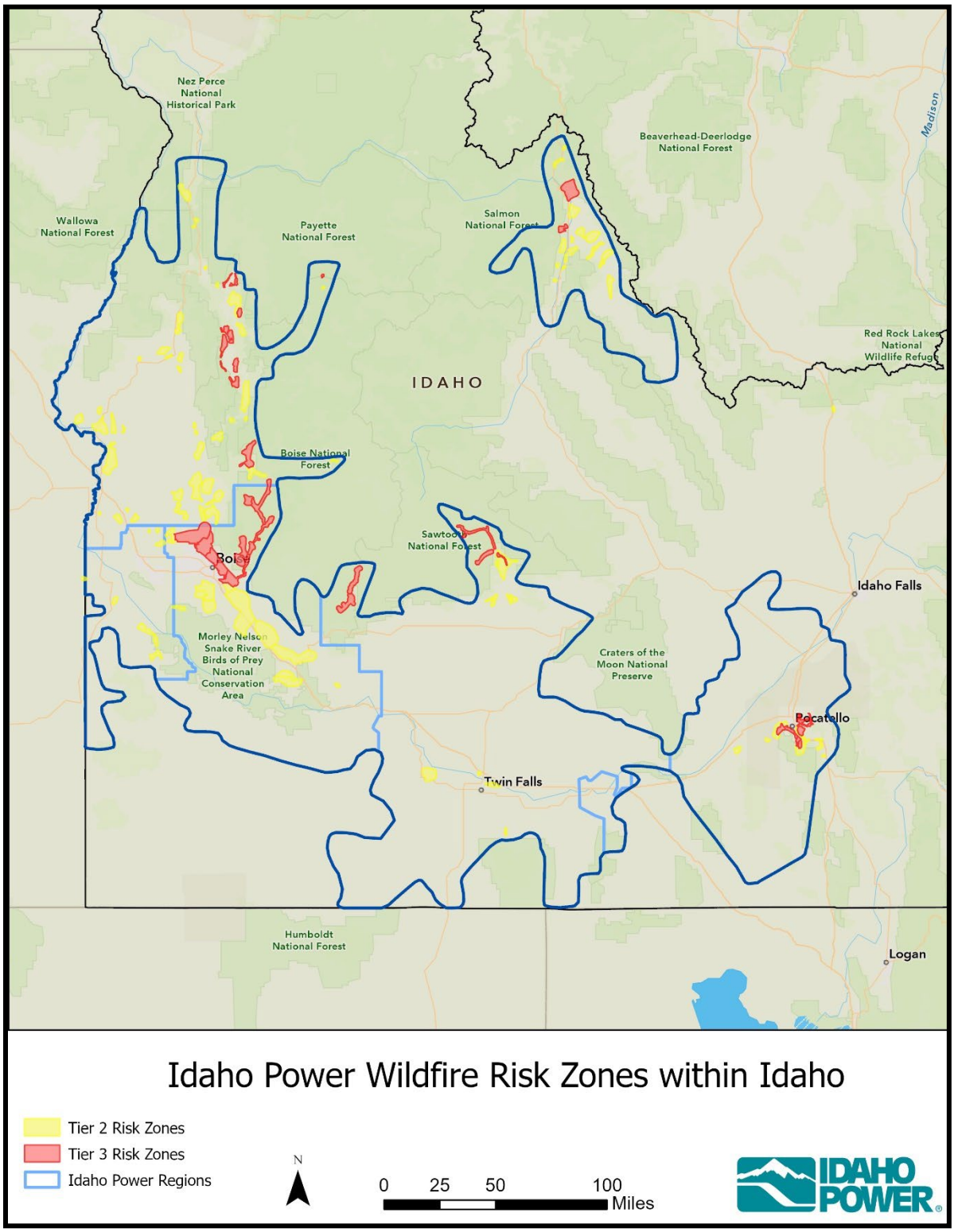


Figure 5
Idaho Power wildfire risk zones within Idaho



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.

The recoverable damages in wildfire litigation in Idaho are identified in Idaho Code § 61-1806(2). The recoverable damages in wildfire litigation against an electric utility in Montana are similar and are set out in Montana Code § 69-2-303(5). Wildfire costs can also include the cost of restoring Idaho Power property.

In assessing the potential consequence of wildfire risk, Idaho Power considered several sources of data on the costs of major wildfires. 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,[21] as did the Pioneer Fire in 2016.[22] 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.[23] In eastern Washington

[21] 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.

[22] Fire Research and Management Exchange System, frames.gov/documents/catalog/calkin_et_al_2016_PioneerFireInquiry.pdf.

[23] 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.

in 2023, the Gray and Oregon fires together destroyed over 350 homes and caused multiple fatalities.[24]

In more catastrophic events, the costs are exponentially higher. The recovery costs of the Maui wildfires in 2023 are expected to exceed $12 billion,[25] and in California, costs and damages associated with the 2025 Los Angeles wildfires are estimated between $28 billion and $53.8 billion.[26] The recent Spokane Complex fires of 2026 in Spokane, Washington destroyed over 800 homes and are estimated to have caused more than $1 billion in damage. [27]

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 6.

[24] ArcGIS StoryMaps, Gray and Oregon Wildfires, storymaps.arcgis.com/stories/9a77e2ece6d6421ebc9c6a60635742c8.

[25] 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.

[26] Matt Horton et al., Impact of 2025 Los Angeles Wildfires and Comparative Study, Institute for Applied Economics, February 2025, LAEDC_2025-LA-Wildfires-Study_090525-UPDATE.pdf

[27] Thomas Clouse, Spokane fire damages will exceed $1 billion, The Spokesman Review, https://www.spokesman.com/stories/2026/aug/21/spokane-fire-damages-will-exceed-1-billion/

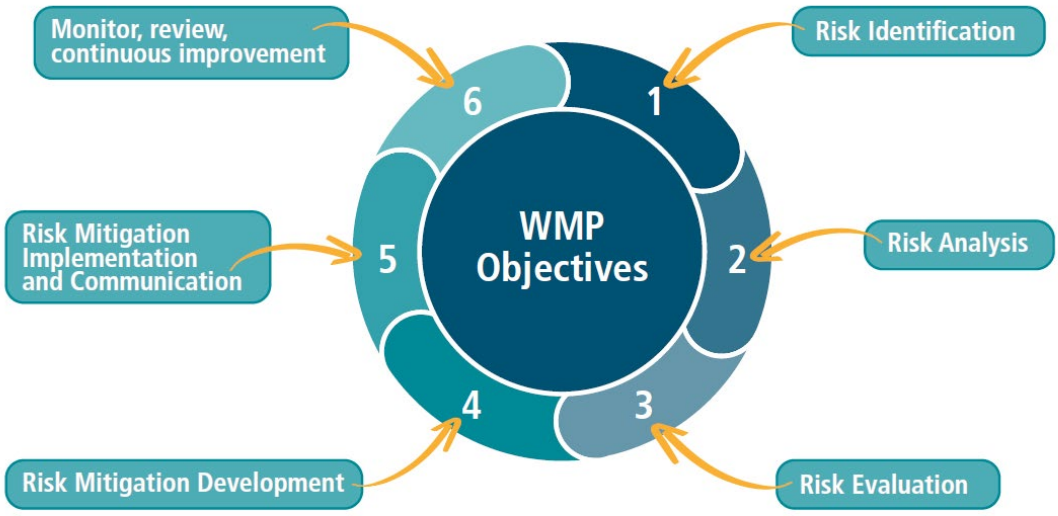


Figure 6
Idaho Power WMP risk management framework

The risk management 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 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 risk management 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 7, as a visual representation of equipment-specific wildfire ignition risks, including key drivers, scenarios, likelihood, and potential impacts.

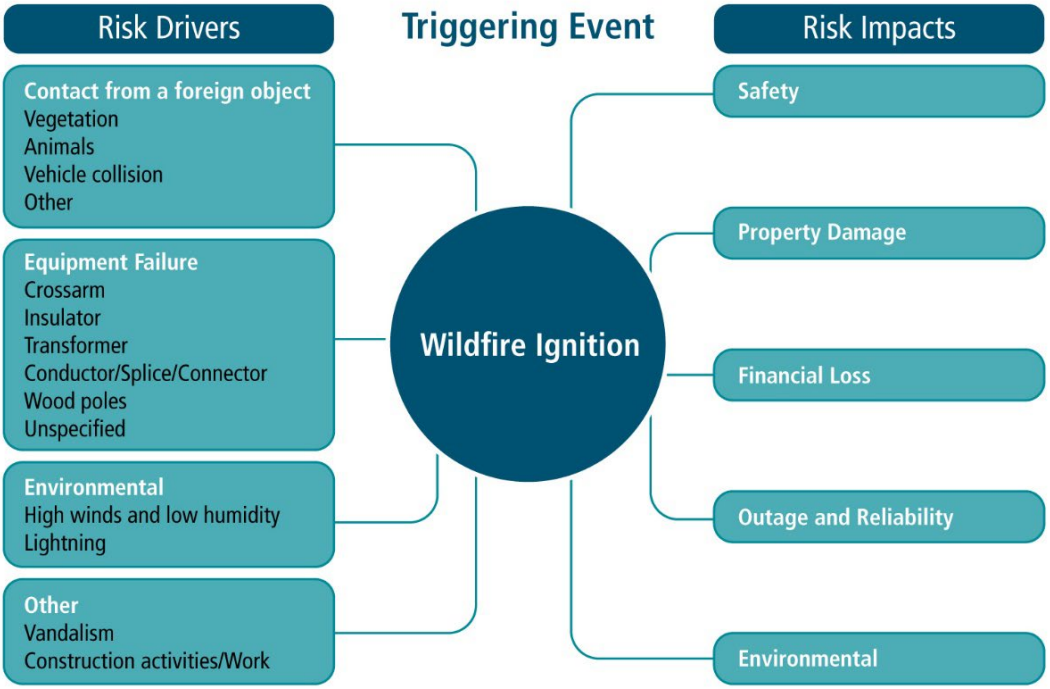


Figure 7
Risk bow-tie diagram

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 the following three components.

- **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 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 power lines may be a risk driver if proper safety precautions are not taken to eliminate inadvertent equipment contact.

- **Risk Impacts**: While most wildfires 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 operational experience, 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 benefits 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 2027 WMP reflect a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

Idaho Power applies these principles across the wildfire mitigation programs described throughout this WMP. For infrastructure mitigation projects primarily driven by wildfire risk reduction, Idaho Power further applies the Risk-Informed Mitigation Evaluation Framework described in Section 3.5 to support project-specific evaluation and selection.

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	Reliability	Resiliency
	Defined as the potential to pose a danger, risk, or injury to life or property	*Defined as the ability of the power system to withstand instability, uncontrolled events, cascading failures, or unanticipated loss of system components*	*Defined as the ability for the grid system to adapt to, withstand, and quickly recover from disruptive events or changes within the surrounding environment*
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		

3.5. Risk Informed Mitigation Evaluation Framework

3.5.1. Purpose

In 2026, consistent with IPUC Order No. 37004, Idaho Power began developing a Risk-Informed Mitigation Evaluation Framework (Framework) to support the planning-level evaluation of both costs and benefits associated with the infrastructure projects primarily driven by wildfire risk reduction described in Section 8 of this WMP. The Framework is intended to reflect a per-project cost-benefit analysis demonstrating that each project reasonably balances costs with

reductions in wildfire risk, while also considering other project benefits to Idaho Power and its customers. The Framework supplements existing Idaho Power project assessment processes; it does not replace those processes or establish a single determinant for project selection.

The Framework is a generally applicable planning approach rather than a mandatory sequence, scoring protocol, or representation that every factor or alternative applies to every project.

3.5.2. Relationship to Idaho Power's Wildfire Mitigation Strategy

Idaho Power's wildfire mitigation strategy incorporates multiple layers of mitigations. Thus, the mitigations described throughout this WMP form the broader context for the application of the Framework to Section 8's infrastructure projects.

3.5.3. Framework Overview

The Framework generally consists of three steps: 1) Identify Candidate Locations, 2) Evaluate Mitigation Alternatives, and 3) Select Mitigation and Document Rationale.

3.5.4. Identify Candidate Locations

Under the first step of the Framework, Idaho Power utilizes a variety of information to identify candidate locations for further evaluation, such as location within a wildfire risk zone, modeling outputs based on historical outage rates,[28] inspection findings, asset management information, system planning information, operational experience, and other planning inputs. Together, these inputs help Idaho Power evaluate potential relative wildfire risk, co-benefits that might be obtained from a project, and potential mitigation opportunities.
Candidate locations identified may consist of line segments, circuit sections, or other infrastructure locations exhibiting similar characteristics within a geographic area. Identification of a candidate location does not require implementation of a project; rather, it identifies locations that may warrant further evaluation for potential selection. These inputs help inform project evaluation but do not independently determine project selection.

[28] Idaho Power considers outage information as a rough proxy from which to gain a sense of potential equipment-specific ignition risk because it is the best available data for identifying locations that may warrant further wildfire mitigation evaluation. While Idaho Power does not have a developed body of ignition data, Idaho Power does have a historical body of equipment-specific outage data that records initial causal impressions. Idaho Power therefore uses this historical outage data to gain a sense of potential ignition risk at the asset level. However, Idaho Power recognizes that an outage does not necessarily mean an ignition will occur, as ignitions require both the release of fault energy, which does not necessarily occur in an outage, and that the released fault energy is sufficient to ignite available fuels under receptive fuel and weather conditions. Idaho Power, therefore, uses outage information in conjunction with other risk factors when evaluating candidate project locations.

3.5.5. Evaluate Mitigation Alternatives

For each candidate location identified, Idaho Power evaluates feasible mitigation alternatives. At this stage, Idaho Power focuses on engineering feasibility. Generally, Idaho Power considers the following to be available mitigation alternatives for the assessment for feasibility:[29]

- Overhead hardening

and/or

- Undergrounding

and/or

- Line relocation

Notably, not all alternatives are feasible, necessary, or appropriate in every location.

3.5.6. Select Mitigation and Document Rationale

Mitigation selection is based on project-specific circumstances and a comparison of the benefits provided by each alternative, as well as potential cost. Idaho Power considers the benefits listed below in Figure 8 that might be obtained from each alternative. When assessing project cost, Idaho Power considers the project's estimated total cost over its expected useful life.

[29] Line segmentation is another hardening strategy that Idaho Power employs as a Section 8 distribution mitigation; however, it is not considered a viable alternative to the above mitigations in the majority of cases.

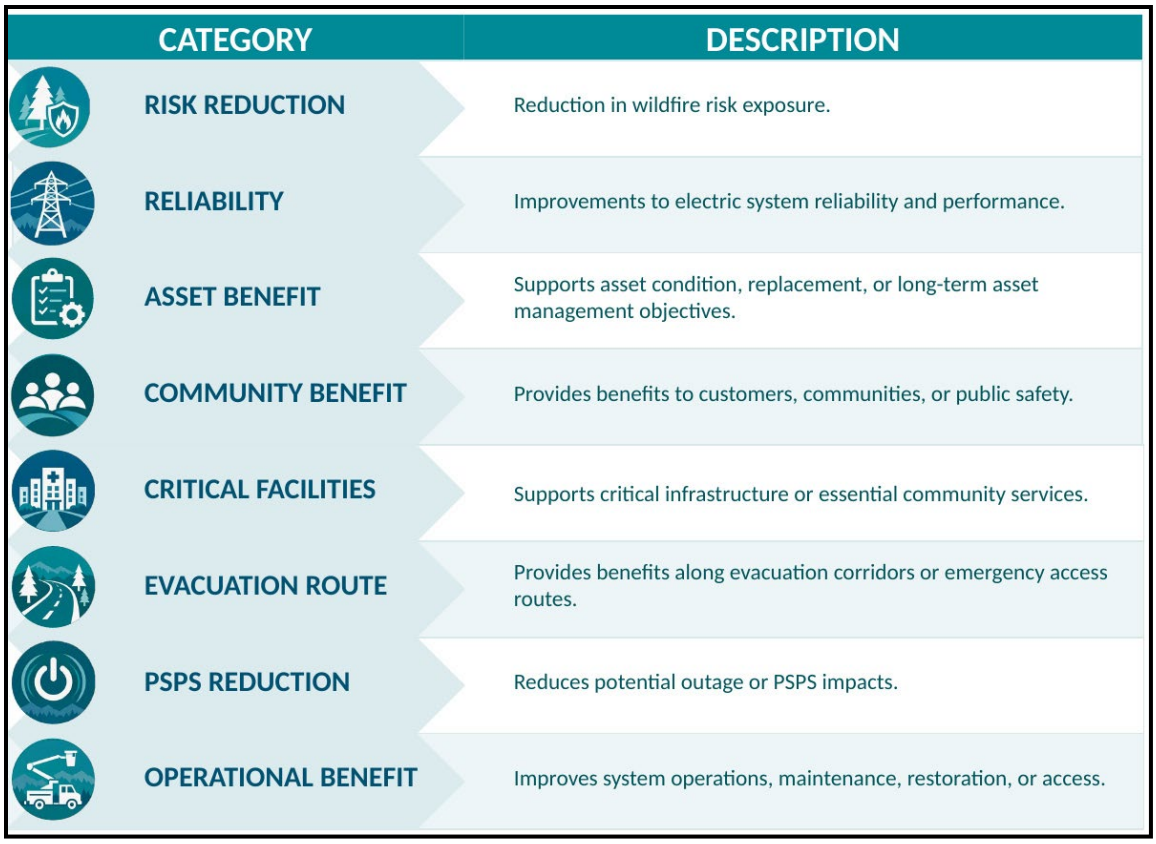


Figure 8
Potential mitigation selection benefits

Different mitigation alternatives may be appropriate depending on location characteristics, expected project benefits, implementation requirements, and estimated cost. The purpose of the evaluation at this stage is to identify the mitigation that provides the most appropriate combination of benefits relative to cost for the location being evaluated, in Idaho Power's determination.

Table 4 summarizes common illustrative reasons why Idaho Power may select a particular mitigation alternative. The considerations shown are examples only and may vary depending on project-specific circumstances.

Table 4
Typical reasons for selection by mitigation alternative

Mitigation Alternative	Typical Reasons for Selection
Overhead Hardening	Wildfire risk reduction, reliability improvements, asset replacement opportunities, rebuild opportunities, constructability, lower cost, and implementation timeline.
Underground Conversion	Enhanced wildfire risk reduction, cost-competitive rebuild opportunities, constructability, operational benefits, community benefits, critical facility benefits, evacuation-route considerations, and PSPS reduction.

Mitigation Alternative	Typical Reasons for Selection
Line Relocation	May be implemented as a stand-alone mitigation or in combination with other mitigation measures to reduce wildfire risk, improve access, support operational objectives, address environmental considerations, or provide other location-specific benefits.

Idaho Power documents the selected mitigation, the primary benefits supporting the project, the estimated cost, and the reason for the selection.

3.5.7. Future Development

Consistent with IPUC Order No. 37004, Idaho Power intends to continue maturing its project-specific cost-benefit analysis in 2027 based on learnings obtained from the implementation of the Framework, as well as other sources of data and information.

Section

4

Situational Awareness and Monitoring



4. Situational Awareness and Monitoring

4.1. Overview

Consideration of current and forecasted meteorological conditions, fuel conditions, and information about wildfire 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 observed weather data for the purpose of assessing and responding to current and anticipated wildfire risk. Idaho Power leverages its internal Atmospheric Science group's modeling/forecasting capabilities, its 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 developed a Fire Potential Index (FPI) to support operational decision-making to reduce wildfire threats and risks. The index incorporates data on weather and fuel conditions (i.e., trees, shrubs, grasses), then 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 NIFC, and has been modified for Idaho Power's climate. Since the original development of the FPI, Idaho Power has continued to enhance its meteorological data and forecasting capabilities to refine FPI accuracy.

The benefits of developing an internal FPI and enhancing the company's meteorological forecasting capabilities include 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.

4.2.1. FPI Components

The FPI reflects key variables as follows: the state of grasses and fine fuels (green-up), woody fuels (ratio of dead fuel moisture to live fuel moisture), 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 seven days included in the forecast. The FPI scores are grouped into the following index levels (shown in Figure 9):

- **Green**: FPI score of 0 through 11 indicates lower potential for a 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 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 fire to develop and spread, based on the variable components described below.

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

Figure 9
FPI categories

The state of grasses and fine fuels, 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 rating is based on the Normalized Difference Vegetation Index (NDVI), a satellite-derived measure of vegetation greenness and health that ranges from 0 to 1. Lower NDVI values indicate sparse or dry vegetation, and higher values indicate dense, actively growing vegetation. The inverse relationship between NDVI and the Green-Up scale is shown in Figure 10.

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 10
Green-Up component of FPI

The **Fuels Component (FC)** of the FPI represents the condition of dead and live woody fuels that can potentially support wildfire, and is calculated as the ratio of dead fuel moisture to live fuel moisture using the following relationship:

$$FC = FD / LFM$$

In the equation above, FD is the 100-hour *dead fuel* moisture, and LFM is the *live fuel moisture* (expressed as a percentage).

Dead fuel moisture is sourced from GridMET[30] (observational data). For 100-hour dead fuel moisture, current conditions are used directly from GridMET data. Forecasted values are then calculated using the Nelson[31] time-lag model with weather inputs from the Idaho Power ensemble forecast system discussed further below in Section 4.4, creating a continuous dataset of observed and forecast dead fuel moisture. These values are scaled to a 1–3 range as the numerator in the equation above.

Live fuel moisture is derived from indicators of vegetation health based on temperature, atmospheric dryness, and day length from both GridMET and the Idaho Power ensemble forecast system. These factors are combined into a daily Growing Season Index (GSI)[32] and averaged over several weeks to represent recent growing conditions. The result is then converted to a live fuel moisture percentage. This process is applied to both observed and forecast inputs to capture short- to medium-term changes in live fuels.

The ratio of FD to LFM in the equation above is scaled from 0 to 5 to represent the FC, as shown in Figure 11.

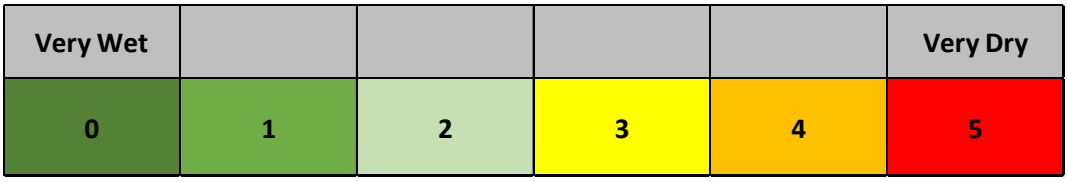


Figure 11
Fuels Component of FPI

The **Weather Component** of the FPI is a matrix of sustained wind speed and dew-point depression using the scale shown in Figure 12. These data are sourced from the WRF products produced by Idaho Power using its High-Performance Computing (HPC) system as well as other publicly available national models.

[30] Abatzoglou, J. T. (2013), *Development of gridded surface meteorological data for ecological applications and modelling*. Int. J. Climatol., 33: 121–131. Available at: https://rmets.onlinelibrary.wiley.com/doi/abs/10.1002/joc.3413

[31] Nelson, R.M. Jr. (2000). *Prediction of diurnal change in 10-h fuel stick moisture content*. Canadian Journal of Forest Research, 30(7), 1071–1087. Available at: https://columbiaweather.com/RPViewDoc.pdf

[32] Jolly, W.M., R. Nemani, and S.W. Running (2005). *A generalized, bioclimatic index to predict foliar phenology in response to climate*. Global Change Biology, 11(4), 619–632. Available at: https://www.frames.gov/documents/catalog/spa/jolly_nemani_running_2005.pdf

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

Figure 12
Weather Component of FPI

4.3. FPI Review and Evaluation

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

For the 2026 wildfire season, key refinements focused on the FC of the FPI, specifically fuel moisture inputs. Previously, this component relied solely on observed GridMET data (Section 4.2.1). As discussed above, the FC now incorporates forecast-derived fuel moisture alongside GridMET observations (Section 4.2.1), intending to provide a more dynamic FC.

4.4. Ensemble Forecast System

In 2024, Idaho Power partnered with the National Center for Atmospheric Research (NCAR) to develop a system that produces multiple custom, high-resolution weather forecast models throughout the day, referred to herein as the Ensemble Forecast System. After initial development, Idaho Power created data pipelines that combined the output of these models with a range of publicly available weather forecast model output. This method allows Idaho Power forecasters to compare different custom and public model outputs to predict a range of possible weather scenarios. Through an interactive data viewer, Idaho Power forecasters can calculate probabilities of the timing, location, and intensity of various weather events, helping them communicate potential outcomes. For 2027, Idaho Power intends to use the Ensemble Forecast System as part of its FC calculations for the FPI. Idaho Power may also, at its discretion, use the Ensemble Forecast System for additional situational awareness purposes.

Idaho Power intends to continue evaluating additional use cases for the Ensemble Forecast System.

4.5. Fire Weather Stations

Idaho Power's Atmospheric Science group utilizes both publicly available and company-owned weather stations to monitor conditions in wildfire risk zones. Due to the limited temporal and spatial density of public weather station networks, the company has installed additional stations within and proximal to its wildfire risk zones.[33] Fire weather station placement is on existing power line poles to reflect real-time wind conditions at power line height and provide representative coverage for a given wildfire risk zone (Figure 13). To date, 154 stations have been installed in Idaho, providing reasonable coverage across all of Idaho Power's wildfire risk zones (Figure 14). Data from these stations are shared through a public feed accessible to the National Weather Service (NWS), public safety agencies, and customers in real-time. Idaho Power plans to install additional weather stations over the next three years as shown in Appendix F, with locations informed by coordinating with the NWS.



Figure 13
Pole-mounted fire weather station

[33] Weather stations may be installed outside of wildfire risk zones in areas proximal to the wildfire risk zone when a suitable pole within the wildfire risk zone is not available for weather station installation.

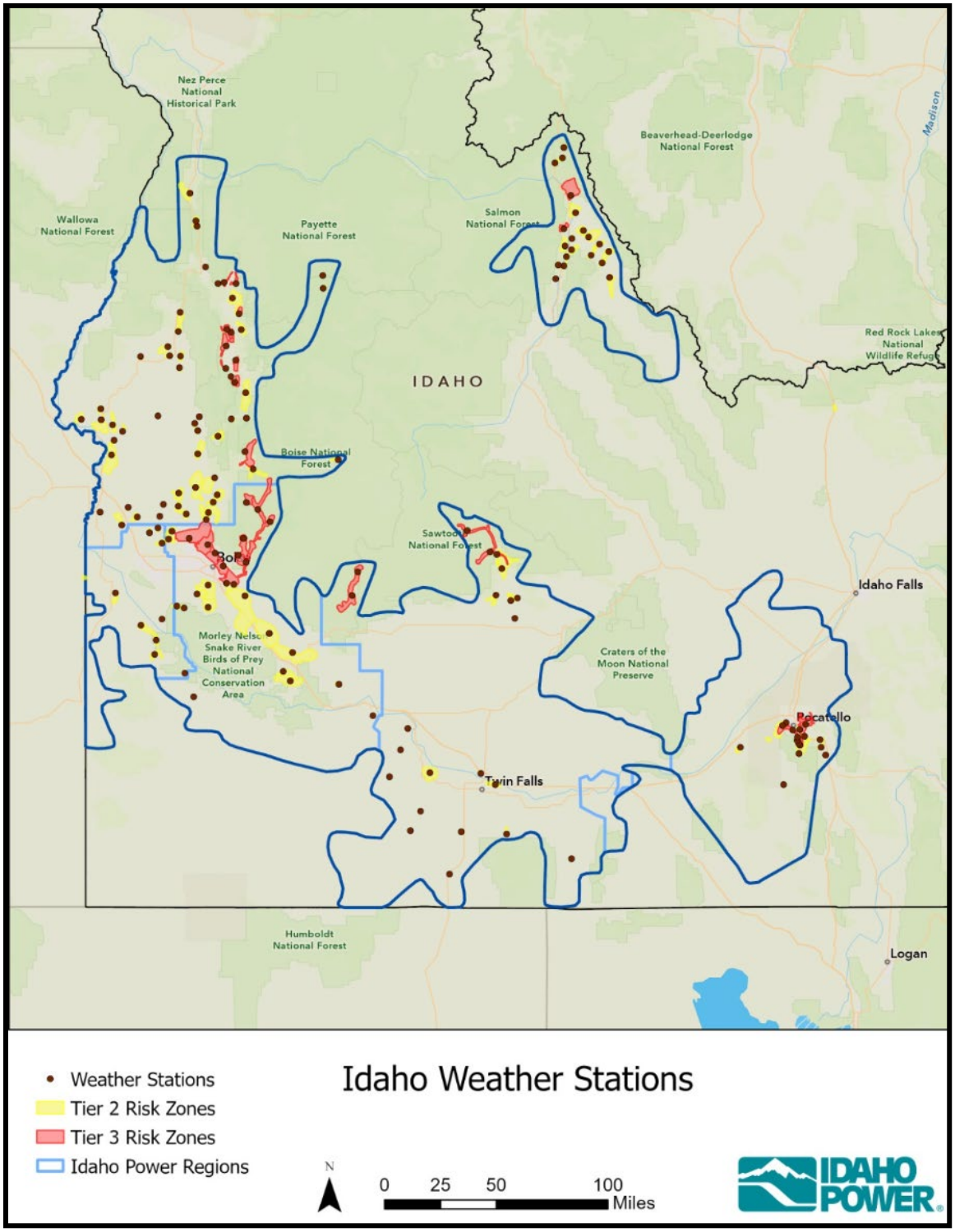


Figure 14
Idaho fire weather station map. Idaho Power does not have any company-owned weather stations in Montana, as it does not have any wildfire risk zones located in Montana. Idaho Power utilizes third-party weather stations for situational awareness in Montana.

4.6. Wildfire Detection Cameras

Idaho Power contracts with ALERTWest, which 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, as well as Idaho Power, to 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 three 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 2024[34] recommending the state formalize a working group process. The recommendation included directions 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 in or interested in wildfire detection camera operations. The Idaho Fire Camera Interoperability Committee (IFCIC) was established in early 2025, with the official charter finalized in early 2026, to deliver on the governor's recommendation.

To date, Idaho Power, through ALERTWest, has installed nine wildfire detection cameras in Idaho in areas where they provide visibility of overhead assets or surrounding terrain in certain wildfire risk zones. These cameras are part of an artificial intelligence (AI)-enabled wildfire detection camera network that totals more than 30 cameras across Idaho owned by various members of the IFCIC. By working closely with the IFCIC and local public safety partners, Idaho Power achieves efficiency 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. Current camera locations are identified in Figure 15.

[34] Wildfire Report Recommendations, August 2024. Available at: IOEMADMINCOPIER-20240418092717

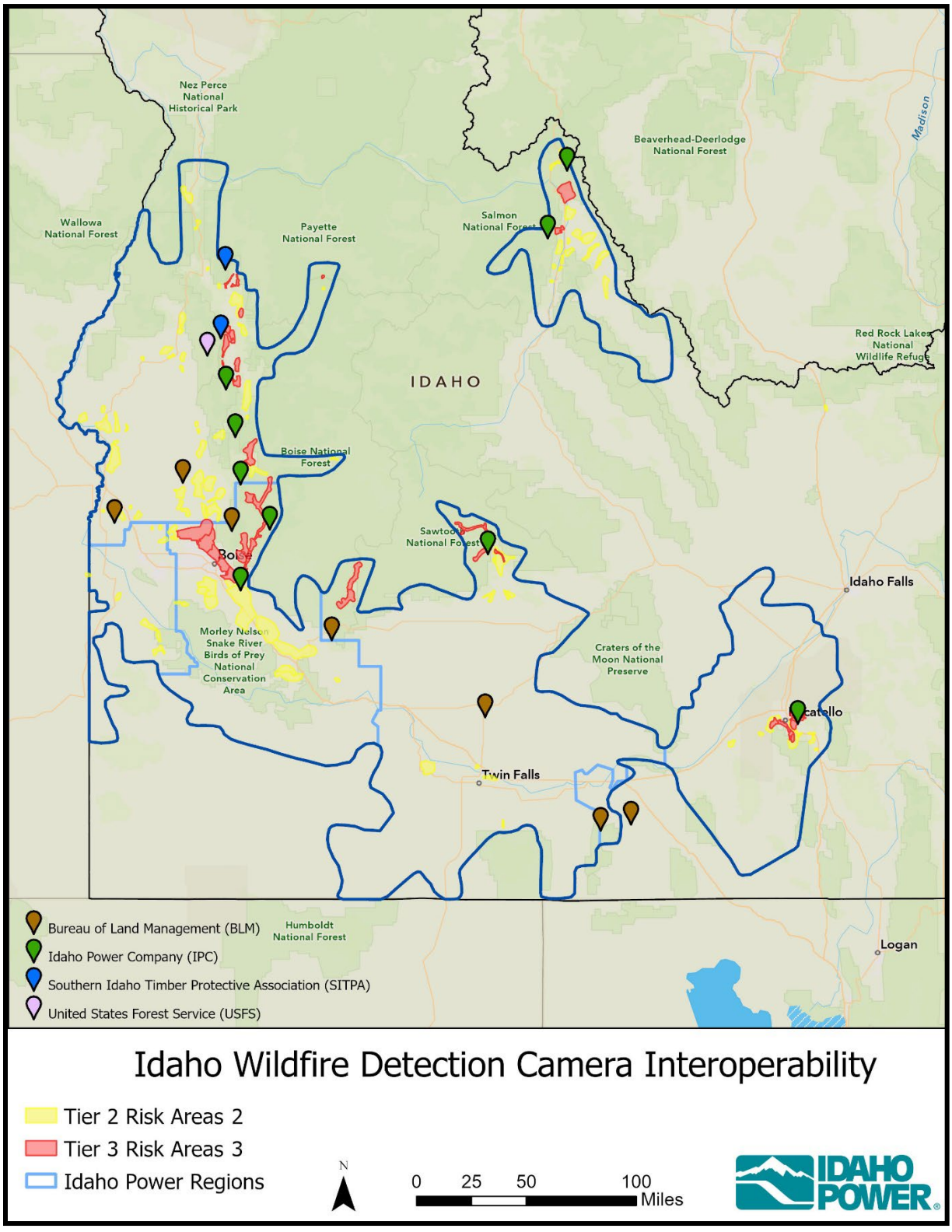


Figure 15
Idaho wildfire detection camera interoperability

4.7. Fire Spread Predictive Tools

Idaho Power continues to explore the use of on-demand capabilities of Technosylva's WFA-E software FireSim and FireRisk in conjunction with the company's internal FPI tool to support operational decisions that reduce wildfire threats and risks. Each daily operational risk product is described in greater detail below.

4.7.1. FireSim

FireSim provides an on-demand capability within WFA-E to generate fire spread predictions based on forecast weather conditions. Idaho Power uses this tool at its discretion for situational awareness and to support decision making during wildfire incidents.

4.7.2. FireRisk

FireRisk integrates Idaho Power's WRF model outputs with FireSim to generate current and near-term wildfire risk forecasts. Idaho Power continues to determine how best to integrate FireRisk outputs in its decision making.

Section

5

Mitigation Activity: Workforce Preparedness



5. Mitigation Activity: Workforce Preparedness

5.1. Overview

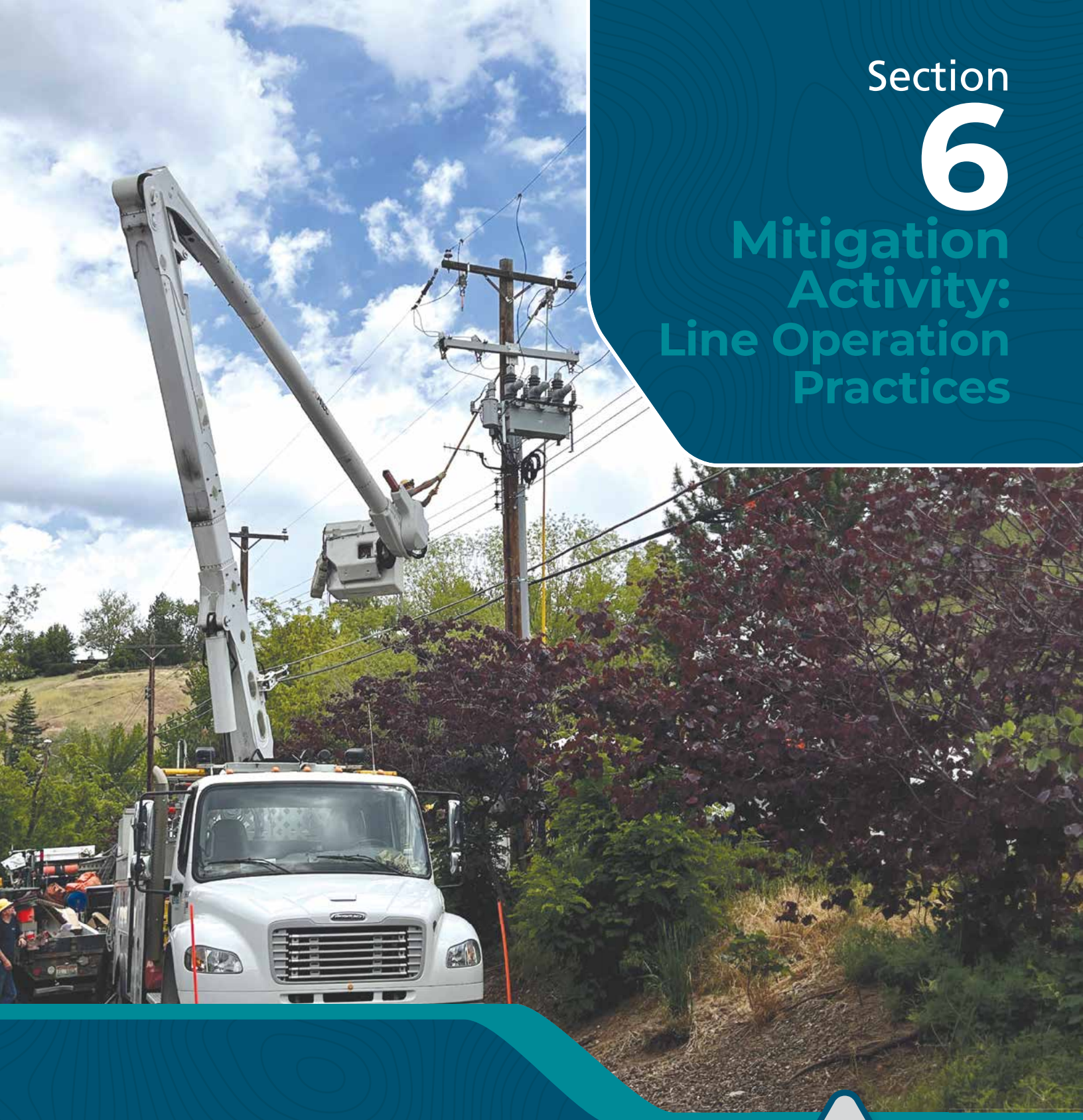
The nature of Idaho Power's operations can mean employees and contractors perform work in the field during wildfire season. For this reason, Idaho Power considers wildfire risk associated with employee and contractor actions in this WMP, as described further below.

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
- Expected wildfire ignition prevention actions while working, and reporting instructions in the event of fire ignition
- Training and compliance requirements for employees in situations covered by the Plan

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 they take adequate wildfire mitigation measures. Idaho Power may require that contractors performing field work abide by wildfire mitigation terms as part of their contract. These terms require contractors to ensure they follow practices intended to mitigate against wildfire 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 public safety power shutoff (PSPS) strategy

6.2. Distribution Operational Protection Strategy

Sometimes called sensitive power line settings, Enhanced Powerline Safety Settings (EPSS) are used to reduce the probability of ignition during fault events on Idaho Power's distribution system. EPSS 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). EPSS help 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 EPSS only under the conditions and protocols defined in this WMP.[35] AR protective devices include feeder relays (at head end of feeder) and reclosers.

- **EPSS 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.

  EPSS Mode 1 is operated as a seasonal setting. It is typically enabled by wildfire risk zone grouping[36] only during declared wildfire season but no later than July 1. Mode 1 remains in effect until the end of declared wildfire season.

[35] Similar protection philosophies are applied in line work contexts to ensure worker safety.

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

- **EPSS Mode 2:** Auto-reclose turned off and trip settings set to instantaneous lock out[37]. This is a more sensitive setting that will cause the AR device to lock out prior to most fuses. Mode 2 is designed to minimize the energy of a fault to reduce ignition risk.

  EPSS 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 on historic climatology. EPSS Mode 2 will remain in effect until Idaho Power determines forecasted conditions no longer warrant the setting. Idaho Power's zone-specific wind speed criteria are set out in the *2027 Operational Wind Speed Guidelines for EPSS 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.

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

In the case of a Mode 1 outage, Idaho Power will typically patrol[38] to the next zone of protection on the affected line. In the event of a Mode 2 outage, Idaho Power generally patrols a line to the end of the line. In either case, Idaho Power may limit the patrol to a targeted area in instances where Idaho Power determines it has identified the cause of the outage with reasonable certainty.

Idaho Power tracks outage events occurring under EPSS Mode 1 and Mode 2 conditions.

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 generally performed prior to re-energization following a sustained outage, also described in this section as a lock out,[39]

[37] "Lock out" refers to the condition in which a protection device has operated and remains de-energized until it is manually or remotely reset. Depending on the protection scheme and settings, lockout may occur following one or more trip/reclose attempts or after a single trip.

[38] For the purposes of a patrol described in Section 6, the lines patrolled are limited to transmission, sub-transmission, or primary voltage level distribution lines (i.e., 12.5 kV to 34.5 kV).

except in cases of planned outages or maintenance activities. The patrol is typically focused on the area where available system information, relay data, field observations, or other tools indicate the fault or outage condition likely occurred and does not involve patrolling the entire line. Unlike normal operating conditions, operators do not routinely test[40] or re-energize transmission lines after they lock out to identify the faulted section before a patrol is completed.

However, for certain 161-kV and 230-kV lines identified in Idaho Power's Energy Management System as serving highly populated areas, when relay fault data and GIS tools allow operators to identify the fault location with—in their opinion—a high degree of confidence, operators may sectionalize the faulted segment and re-energize the unaffected portion of the line to restore service to customers without first conducting a patrol. This exception is intended to facilitate the restoration of unaffected line sections while isolating the suspected faulted area for inspection.

For 345-kV and 500-kV transmission lines, operators may exercise discretion to test the line to maintain grid reliability and stability 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.

If none of these criteria apply, testing will not be performed, and the line will be patrolled as described for transmission lines rated up to 230 kV 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 during the time of a red FPI. If the line locks out, it will be patrolled in the area where Idaho Power has evidence suggesting the fault occurred, consistent with the description in Section 6.3.1, before re-energization. Alternatively, Idaho Power may choose to wait until the FPI level drops out of the red category and re-energize without a patrol.

[40] 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.

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 for implementation of 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 de-energize 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 wildfire 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. Because the lead firefighting agency is generally in the best position to analyze the wildfire risk and water needs in any situation, Idaho Power relies on their determination, subject to the company's ability to identify the line in question and Idaho Power's bulk electric considerations noted below, as applicable.

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 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), 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, Idaho Power will enable EPSS 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 established through the *2027 Operational Wind Speed Guidelines for EPSS and PSPS by Risk Zone.* EPSS 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 patrol the known portion(s) of the de-energized lines impacted by the fire, 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. Public Safety Power Shutoff

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 involves planning and strategy leading up to, during, and after the event to minimize the impact of the PSPS event on stakeholders. Idaho Power tracks data relating to PSPS events.

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 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 when Idaho Power facilities located within wildfire risk zones may be impacted by extreme weather, as described further in the PSPS Plan. To safely isolate electrical facilities serving the affected wildfire risk zone, this may also require de-energization of certain facilities located outside of 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.

Idaho Power has a mobile CRC trailer available that may be used in large-scale, extended outages, when operationally feasible. This unit can be staged where needed in response to extended 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 and depending on the situation:

- Deployment of a CRC
- CRC location(s) and logistics included in community outreach/outage notifications
- Resources, including food and water (as needed)
- 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, however, take measures to support 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 locations 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 5 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 5
Overview of T&D inspection programs

		Transmission			Distribution		
Inspection Type	**Section**	**Outside Wildfire Risk Zone**	**Tier 2 Zones**	**Tier 3 Zones**	**Outside Wildfire Risk Zone**	**Tier 2 Zones**	**Tier 3 Zones**
Visual Inspections Programs (Aerial/Ground)	Sections 7.4.1 (T) & 7.5.1 (D)	Annually	Annually	Annually	None	Annually Selected	Annually
Line Equipment Inspection Program	Section 7.5.2	N/A	N/A	N/A	N/A	Annually	Annually
Detailed Visual (Aerial/Ground) Inspections	Section 7.4.2 (T) & 7.5.3 (D)	10 years*	10 years*	10 years*	3 Years	3 Years	3 Years
Thermal Imaging (Infra-Red)	Sections 7.4.3 (T) & 7.5.4 (D)	N/A	Annually Selected	Annually	N/A	Annually Selected	Annually Selected
Wood Pole Inspection and Treatment Program	Section 7.3	10 years	10 years	10 years	10 years	10 years	10 years
Cathodic Protection Inspection Program	Section 7.4.4	Annually Selected	Annually Selected	Annually Selected	N/A	N/A	N/A

* Western Electricity Coordinating Council (WECC) Lines Only

7.2. 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 repair as soon as reasonably possible, generally within 30 days upon identification by Idaho Power. 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 correction within 24 months of identification by Idaho Power. The correction of these defects is scheduled during crews' normal work schedules. Timeframes can be extended beyond 24 months due to conditions such as materials lead time, including the correction as part of a broader project, and access issues.

- **Priority 3**: Defined 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 generally or included in the next 10-year corrective action plan for the transmission line. On distribution facilities, Priority 3 issues may be monitored until qualifying as Priority 1 or Priority 2 defects.

Idaho Power line patrol employees receive training on defect classification. Idaho Power relies on its contractors to supply qualified electrical workers able to identify defects in accordance with the above-described defect classification.

7.3. 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.

7.4. Transmission Inspection and Asset Management Programs[41]

Idaho Power's transmission inspection and asset management programs include condition-based aerial and ground visual inspections, detailed visual inspections, thermal imaging inspections, transmission wood pole inspection and treatment, and cathodic protection.

Idaho Power's goal is to complete 100% of this 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.

7.4.1. Transmission Visual (Ground/Aerial) Inspection Program

Idaho Power conducts annual visual inspections of all transmission lines using ground-based and aerial inspection methods.[42] Idaho Power strives to complete Tier 3 and selected Tier 2 wildfire risk zone inspections prior to the start of wildfire season; however, spring weather conditions and snow accumulation may limit access in some areas and delay completion until July 1 or later. Other transmission lines may be inspected at any time in the calendar year. Inspections are performed by qualified personnel and may utilize vehicles, helicopters, and/or unmanned aerial vehicles (UAVs). Potential defects identified by inspectors during inspections are documented and scheduled for repair based on their classification.

7.4.2. Transmission Detailed Visual Inspection Program

Idaho Power conducts detailed visual inspections of Western Electricity Coordinating Council (WECC) transmission lines on a 10-year cycle. Detailed inspections generally provide a more

[41] 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.

[42] When Idaho Power conducts a detailed visual inspection on a line as described in Section 7.4.2, the detailed inspection is performed in lieu of the annual visual inspection.

comprehensive evaluation of facility condition through a closer examination of poles, structures, conductors, hardware, insulators, and associated equipment. These inspections are performed by qualified personnel and may utilize helicopters, UAVs, and/or hand-held high-definition imaging. Potential defects identified during detailed inspections are documented and prioritized for corrective action in accordance with the defect classification process described in Section 7.2.

7.4.3. Transmission Thermal Imaging (Infrared) Inspections

Idaho Power annually inspects select transmission line connectors and splices within Tier 3 and select Tier 2 zones using thermal imaging (infrared) cameras. Idaho Power strives to complete these inspections before July 1 generally; however, inspections may be performed later in the year based on load conditions to ensure effective inspections. These inspections are conducted using hand-held, helicopter-mounted, and/or 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.

7.4.4. Transmission Cathodic Protection and Inspection Program

Cathodic protection systems are installed on select steel transmission towers and utilize either Impressed Current Cathodic Protection (ICCP) systems or direct-buried sacrificial magnesium anodes. Structure-to-soil potential testing is performed periodically on selected cathodically protected towers located in wildfire risk zones, at intervals established by Idaho Power. For ICCP systems, rectifiers and ground-beds are checked annually for proper operation, and test results are measured and recorded. Based on these inspection and testing results, Idaho Power performs any necessary repairs and/or system adjustments as determined by Idaho Power.

7.5. Distribution Inspection and Asset Management Programs

Idaho Power's distribution inspection and asset management programs include annual condition-based visual inspections; detailed visual inspections, thermal-imaging inspections; wood pole inspection and treatment; and line equipment inspections, as described further below.

7.5.1. 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 and select Tier 2 zones. The inspections are conducted to

identify Priority 1 defects (defined in Section 7.2) based on the inspector's judgment and experience.

Patrols are performed using four-wheel-drive vehicles, all-terrain vehicles (ATVs), utility terrain vehicles (UTVs), or on foot. Inspectors use visual observation, binoculars, and/or UAVs, as the inspector deems appropriate, to conduct the inspection. While helicopters are generally not practical for distribution line inspections in areas with higher population density and greater concentrations of structures and vegetation, Idaho Power may utilize helicopters on a case-by-case basis when warranted.

Inspectors strive to inspect the line through to the service transformer only; they do not inspect beyond the service transformer as part of annual visual inspections in order to allow the inspections to be completed generally before July 1. The identified defects are then documented, prioritized, and scheduled for repair consistent with defect classification, as discussed in Section 7.2.

Idaho Power strives to complete inspections under this Section 7.5.1 before the start of each wildfire season. However, access constraints may delay completion in some areas until July 1 or later.

7.5.2. Line Equipment Inspection Program

Idaho Power strives to inspect line equipment in and immediately feeding all wildfire risk zones, including capacitor banks, AR 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.

7.5.3. Detailed Inspection Program

Idaho Power performs detailed patrol inspections of all distribution lines on a three-year cycle. Detailed inspections generally provide a more comprehensive evaluation of facility condition through a closer examination of poles, structures, conductors, hardware, insulators, and associated equipment. Inspections are performed using four-wheel-drive vehicles, ATVs, UTVs, or on foot. Inspectors use visual observation, binoculars, and/or UAVs, as appropriate to identify any defects consistent with Section 7.2. While inspectors strive to inspect the line up to the point of delivery, circumstances, such as access issues, physical obstacles, and customer objections, may prevent inspectors from inspecting to this point. Inspections document identified defects and prioritize corrections according to priority level, as described in Section 7.2.

7.5.4. 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 the defect classification system set out in Section 7.2.

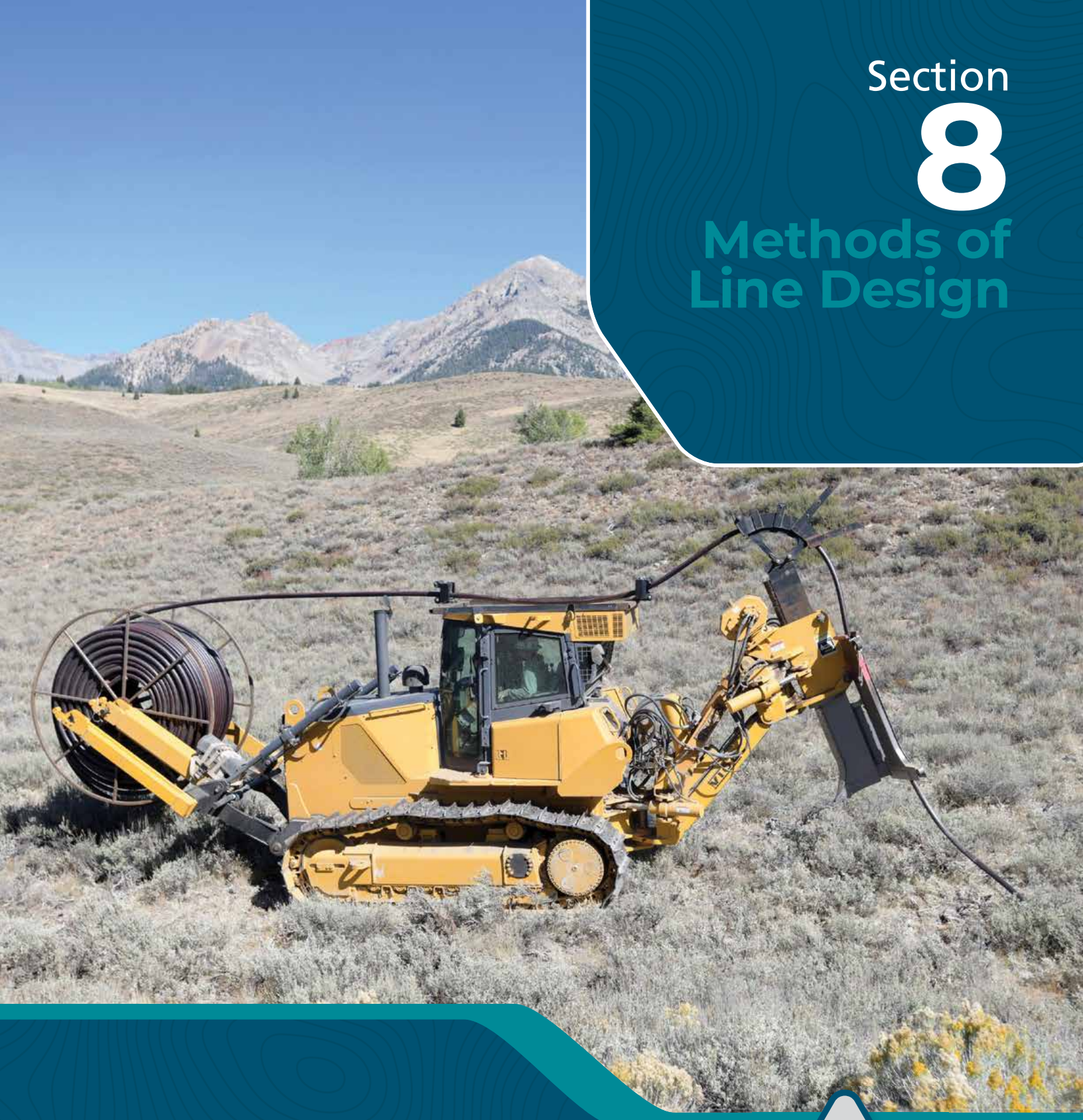
7.5.5. Pole Attachments

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 for performing its work according to industry standards, maintaining its equipment in good working order, and taking 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 wildfire risk.

On an annual basis, Idaho Power assesses potential construction (rebuild, hardening, and/or upgrade) work for its transmission and distribution lines. Candidate projects are identified through inspection and maintenance programs, wildfire risk evaluations, operational needs, reliability considerations, and other planning activities. Following project identification, Idaho Power develops project scopes, evaluates engineering requirements, establishes cost estimates, obtains necessary permits and approvals, and other applicable requirements. Each of these activities can impact the timeline and feasibility of the project. Some candidate projects identified may be deferred or even removed from the project pipeline based on considerations identified through the project development process.

Idaho Power generally plans and develops projects over a multi-year horizon to support efficient engineering, permitting, resource planning, and construction scheduling. Projects advance through planning, engineering, and construction phases and are prioritized based on system needs and benefits, including wildfire risk reduction, and available resources. Final project selections intended to be completed in a given calendar year are reviewed and approved by leadership.

Idaho Power's goal is to complete 100% of the planned project work for that 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 transmission poles on its system, which is allowed under this WMP. However, when building new 138-kV lines and above, 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 wildfire 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. Idaho Power prioritizes transmission line rebuild projects through a planning process that considers asset condition, inspection results, maintenance history, system reliability, operational needs, facility criticality, load growth, transmission planning requirements, stakeholder input, and wildfire risk. Although many transmission line rebuild projects are initiated to address broader system needs, Idaho Power considers wildfire risk and opportunities to improve system resiliency as part of project evaluation and prioritization. As a result, transmission line rebuild projects often provide multiple benefits, including improved system reliability and increased wildfire resiliency.

8.3.1. Targeted Structural Reinforcement

In addition to transmission line rebuild projects, Idaho Power may implement targeted structural reinforcement measures on existing transmission facilities to enhance structural resiliency. These measures are intended to address site-specific conditions identified by Idaho Power through inspections, engineering evaluations, maintenance history, operational experience, and/or wildfire risk considerations.

Potential structural reinforcements may include the installation of supplemental crossarm bracing or guying components, reinforcement clamps, replacement of hold-down assemblies on H-frame structures, and other modifications designed to enhance the structural performance of existing facilities.

Targeted structural reinforcements are not implemented through a system-wide replacement program and Idaho Power does not apply them across the transmission system. Instead, Idaho Power evaluates these opportunities on a case-by-case basis as part of its ongoing asset management, inspection, maintenance, and engineering processes. Where engineering review by Idaho Power determines that a reinforcement measure provides a practical and cost-effective means of enhancing facility condition, reliability, or wildfire resiliency, the reinforcement may be incorporated into a given planned maintenance activity, corrective work, or capital project.

8.4. Distribution Investments

Distribution hardening is an ongoing component of the WMP. This work reflects a reasonable balancing of mitigation costs with wildfire risk reduction. Overhead distribution infrastructure located in wildfire risk zones is analyzed, inspected, and hardened as Idaho Power deems appropriate using the strategies and analytical framework discussed below.

Idaho Power deploys hardening efforts utilizing the Framework described in Section 3.5. The timing of work activities and selection of structures and equipment for hardening are determined at the discretion of Idaho Power. Idaho Power strives to schedule projects efficiently utilizing both internal construction crews and external contractors, allowing work to proceed concurrently across multiple locations. Distribution hardening activities are implemented on a rolling basis over the course of multiple years, consistent with internal prioritization analysis and scheduling.

In certain circumstances, Idaho Power may relocate or reroute electrical facilities as part of its hardening efforts. Line relocation may be implemented as a stand-alone mitigation or in combination with other mitigation measures, such as overhead hardening or underground conversion. Relocation may be utilized to address permitting requirements, land use constraints, construction considerations, maintenance access needs, environmental factors, or identified wildfire risk drivers. Line relocation may be incorporated into hardening projects discussed in this section when it supports the project's overall objectives and provides operational and/or wildfire risk reduction benefits.

8.4.1. Overhead Primary Hardening Program

Overhead primary hardening includes upgrading overhead power lines to reduce wildfire risk and improve safety. In 2027, Idaho Power's overhead primary hardening is focused on certain Tier 3 and Tier 2 zones[43] or portions thereof using the strategies discussed below. Idaho Power will strive to meet the 2027 targets identified in Appendix F.

Idaho Power's overhead primary hardening program strategies and equipment are evaluated by patrolmen, troublemen, reliability engineers, and the company's Methods and Materials department to determine cost-effective solutions that balance overall costs with expected risk reduction. 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.

Table 6 describes methods that may be used as part of the company's overhead primary hardening program in a given overhead hardening project. Not all these strategies are employed in all scenarios. At their discretion, Idaho Power personnel select the appropriate hardening methods for a given project 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.

[43] If circumstances impact the ability to perform overhead hardening in Tier 3 zones, Idaho Power may, at its discretion, assess whether to perform hardening in additional Tier 2 zones.

Table 6
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 and/or polymer switches, and recently installed poles may not require replacement. Instead, Idaho Power applies a 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 to underground and does so by reasonably balancing mitigation costs of undergrounding with the resulting reduction in wildfire risk and comparing mitigation alternatives using its mitigation-selection framework. Idaho Power will strive to meet the overhead to underground conversion targets in 2027, as identified in Appendix F.

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 its WMPs using the Framework and is not required to undertake undergrounding or hardening measures beyond what is reasonably planned and approved by Idaho Power leadership for a given year.

The company uses the Framework described in Section 3.5 to select locations for underground conversion 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.
- Wildfire history where overhead power lines 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 wildfire 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 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 simultaneously 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 long-term cost savings, and potential reliability benefits, as well as other potential benefits, are typically 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 EPSS, resulting in the ability for Idaho Power to minimize impacts from de-energization and unplanned EPSS 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 patrolled prior to 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 savings and avoiding costs that would otherwise be incurred if devices are 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.

- **EPSS Compatibility**: The second criterion is the device's ability to support EPSS. 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 wildfire 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.



Section

9

Vegetation Management

9. Vegetation Management

9.1. Overview

Idaho Power's vegetation management activities address public safety, regulatory compliance, electric reliability, and help safeguard primary distribution and transmission lines from trees and other vegetation that may cause an outage or damage to facilities. As more fully described throughout this section, these activities encompass planning, scheduling, performing, and quality control related to the management of trees and vegetation that could impact lines, as well as the clearing of vegetation from the base of certain poles and line structures.

Idaho Power's vegetation management program consists of both routine vegetation management activities and enhanced vegetation management activities. Routine vegetation management activities are performed throughout Idaho Power's transmission and distribution system to maintain vegetation clearances, support system reliability, comply with applicable regulatory requirements, and address vegetation conditions that could affect the operation of electric facilities.

Idaho Power has also 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. Enhanced vegetation management activities supplement Idaho Power's routine vegetation management program within designated wildfire risk zones. These activities are intended to further reduce vegetation-related wildfire ignition potential and wildfire risk.

Table 7 summarizes Idaho Power's vegetation management activities and schedules with respect to both routine vegetation management activities and enhanced vegetation management activities.

Idaho Power's vegetation management activities and schedules are designed to comply with applicable National Electric Safety Code (NESC), federal, and state requirements and occur year-round.

Idaho Power faces challenges that impact its ability to complete 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. Idaho Power adheres to the vegetation management activities and cadences stated below to the extent practicable given these obstacles.

9.2. Program Components

Idaho Power employs a variety of inspection, patrol, mitigation, and quality assurance activities to identify and address vegetation-related risks and to maintain clearances around its lines.

9.2.1. Vegetation Risk Identification

Idaho Power conducts a variety of vegetation management patrols, described further below, to identify vegetation risk relative to its lines, beyond maintaining vegetation clearances around its lines. These patrols are performed by Idaho Power-employed arborists and qualified vegetation management contractors (collectively referred to herein as Utility Arborists) who evaluate vegetation conditions through field observations, established procedures, and professional judgment.

Utility Arborists generally evaluate for the following types of vegetation risk visible at the time of patrol:

- **Cycle Busters**: Vegetation identified by the Utility Arborist as exhibiting growth rates that may result in encroachment into line clearances before the next scheduled pruning cycle.
- **Hazard Trees**: Trees identified by the Utility Arborist as showing signs of mortality at the time of patrol or have one or more structural defects that could make the tree likely to fail and fall into or onto power lines.
- **High-Priority Vegetation**: Any vegetation condition identified by the Utility Arborist as likely to cause a line outage with a high risk of failure in the next few days or weeks. These are normally tall Hazard Trees that have one or more defects that could cause the tree to fail and fall into or onto power lines. High-Priority Vegetation could also be vegetation that is in good condition but has grown so close to the line that it presents a high risk of coming into contact with the line through a combination of conductor sag and/or wind-induced movement of the conductor or the vegetation.
- **Vegetation Encroachments:** Vegetation identified by the Utility Arborist as growing into the clearance envelope of the line. Because of Idaho Power's cycle pruning efforts, Idaho Power generally expects that Vegetation Encroachments found on vegetation management patrols will be Cycle Busters.

9.2.2. Vegetation Mitigation

Idaho Power, through the actions of its employees or contractors, completes appropriate mitigations to address the issues identified by Utility Arborists. Throughout the vegetation management section, the term Vegetation Mitigation is used to refer to the appropriate action required either to address vegetation risk or on-cycle pruning. A Vegetation Mitigation is generally the pruning and/or removal of vegetation.

Idaho Power mitigates vegetation risk categorized as a High-Priority Vegetation on an expedited basis upon identification and reporting. High-Priority Vegetation is expected to be reported to an Idaho Power internal arborist following identification without intentional time delay. Other vegetation risks are addressed as scheduled work. Vegetation Mitigation methods include crews using hand saws, chainsaws, pruners, specialized machinery, and herbicides.

Trees are pruned using a pruning procedure called directional or natural pruning, a method recommended by the International Society of Arboriculture, and the American National Standards Institute (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.

Vegetation Mitigation in relation to a service[44] wire is not part of Idaho Power's vegetation management activities, except on a case-by-case basis upon customer[45] or their agent's request. Customers are responsible for keeping trees and other vegetation located on or growing into the customer's property from potentially interfering with Idaho Power equipment, including an overhead service line. Idaho Power encourages customers to take care when pruning vegetation near power equipment and utilize trained professionals to prune around service wires. Customers may reach out to Idaho Power to request de-energization to support pruning around a service wire.

When pruning or removing trees, Idaho Power generally leaves wood in place to biodegrade when the wood is dead or when the wood is in non-landscaped areas. In landscaped areas, all wood greater than 4 inches in diameter is cut to manageable lengths and left for the property owner's use; live wood smaller than 4 inches in diameter is chipped and removed from the property.

9.2.3. Vegetation Mitigation Activity Schedule

Table 7 summarizes vegetation management activities performed on Idaho Power's transmission and distribution system, including applicable inspection and maintenance frequencies within and outside wildfire risk zones.

[44] The service wire is the conductors (wires or cables) that connect Idaho Power's facilities to customer equipment.

[45] In this context, customer is defined as the individual, partnership, association, organization, public or private corporation, government, or governmental agency receiving or contracting with Idaho Power for electric service.

Table 7
Vegetation Management Program initiatives and schedules

Vegetation Management Program Initiatives and Inspection Schedule*							
Inspection Type & Section		Transmission			Distribution		
		Outside WRZ	Tier 2 Zones	Tier 3 Zones	Outside WRZ	Tier 2 Zones	Tier 3 Zones
Wildfire Mitigation Patrol**	Sections 9.3.1 & 9.4.2	None	None	Annually	None	Annually	Annually
NERC/WECC Line Patrol***	Section 9.3.1	Annually	Annually	Annually	N/A	N/A	N/A
Line Clearing Cycles Patrol	Sections 9.3.2 & 9.4.2	3 years (Valley Locations)/6 years (Mountain Locations)	3 years (Valley Locations)/6 years (Mountain Locations)	3 years (Valley Locations/6 years (Mountain Locations)	3 years	3 years	3 years
Mid Cycle Patrol (Cycle Busters)	Sections 9.3.2 & 9.4.2	18 Months	18 Months	18 Months	None	2 years after Cycle Prune	2 years after Cycle Prune
Quality assurance (QA)/Quality Control (QC) Audit Patrols	Sections 9.3.3 & 9.4.4	Sampling	100%	100%	Sampling	100%	100%
Targeted Pole Clearing	Section 9.5	Annually Selected	Annually Selected	Annually Selected	Annually Selected	Annually Selected	Annually Selected

*Idaho Power strives to maintain the cycles identified herein. Idaho Power anticipates achieving the 3-year cycles identified in this table by the end of 2026 but may not meet them in all instances.

**Wildfire Mitigation Patrols are typically performed prior to July 1, unless inclement weather causes access issues, which may result in a delay.

*** NERC/WECC are inspected annually. If a NERC/WECC line is located within a wildfire risk zone, the line is inspected once that year and not inspected again with another type of inspection.

9.2.4. 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 Wildfire Mitigation Patrol and NERC/WECC Patrol

Utility Arborists annually conduct aerial and/or ground patrols of all transmission lines located in Tier 3 zones and all NERC- and WECC-regulated transmission lines to identify vegetation risk that could cause, in the opinion of the inspecting Utility Arborist, an outage during that calendar year. Vegetation risk found is mitigated as described in Section 9.2.2.

9.3.2. Transmission Line Clearing Cycles

Idaho Power performs cycle pruning of vegetation around transmission lines on a general cycle of every three years for urban and rural valley areas and six years for mountain areas. During cycle pruning, the Utility Arborist both identifies and mitigates vegetation risk as described above and removes enough vegetation such that, in the judgment of the Utility Arborist, the vegetation is unlikely to grow into the line clearance envelope before the next cycle pruning.

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. When deemed appropriate by Idaho Power and allowed by property owners/land managers, tree-growth regulators and spot herbicide treatments are also applied in compliance with federal or state requirements as part of the cycle pruning activity. These treatments are effective for reducing regrowth of sprouting deciduous shrubs and trees and extending maintenance cycles.

Idaho Power also conducts mid-cycle vegetation management patrols of documented Cycle Busters on transmission lines every 18 months to identify vegetation risk, particularly encroaching vegetation. Idaho Power mitigates vegetation risk identified on mid-cycle patrols as described in section 9.2.2.

9.3.3. Transmission Line Clearing Quality Control and Assurance

Outside of wildfire risk zones, audits[46] are performed on a sample of pruning worksites selected by an Idaho Power contractor. These audits are performed through a combination of the contracted arborists that planned the work and Idaho Power's internal arborists. In wildfire risk zones, audits are performed on 100% of pruning work. Auditors check if pruning cuts meet specification and proper clearance was achieved. This quality control and assurance program has proven valuable by discovering 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

The following sections describe Idaho Power's distribution line cycle pruning and vegetation management patrol processes.

9.4.1. Distribution Vegetation Inspections: Wildfire Mitigation Patrol/Pruning

Utility Arborists annually conduct vegetation management patrols of the portion of each distribution circuit located in a wildfire risk zone to identify vegetation risk. These patrols are generally performed prior to wildfire season, but no later than July 1. Vegetation risk found is mitigated in accordance with Section 9.2.2.

9.4.2. Distribution Line Clearing Cycles

Idaho Power strives to cycle prune distribution lines, regardless of location, on a three-year cycle. As with transmission line cycle pruning, the Utility Arborist both identifies and mitigates vegetation risk and removes enough vegetation such that, in the judgment of the Utility Arborist, the vegetation is unlikely to grow into the line clearance envelope before the next cycle pruning.

In wildfire risk zones, Idaho Power strives to perform mid-cycle pruning in the second year to identify and remove Cycle Busters that, in the judgment of the Utility Arborist, should be removed to prevent vegetation from encroaching into the line clearance envelope for the full pruning cycle. In addition, Idaho Power performs vegetation mitigation on lines on an

[46] Throughout the WMP, the term 'audit' is used in an informal context and does not mean a formal audit conducted by the company's Audit Services Department or by an outside auditing firm.

"as-needed basis" in situations where fast, unexpected growth occurs and is reported by an employee or customer. Vegetation risk found is mitigated in accordance with Section 9.2.2.

9.4.3. Distribution Line Clearance Distances

Idaho Power has a target to maintain clearance distance between vegetation and conductors, where practicable, as follows:

- Five feet for conductors energized at 600 through 50,000 volts.
- Clearances may be reduced to 3 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, as necessary.
- For conductors energized below 600 volts, subject to the service wire-related exceptions discussed in Section 9.2.2, vegetation is pruned to prevent the vegetation from causing unreasonable strain on electric conductors.

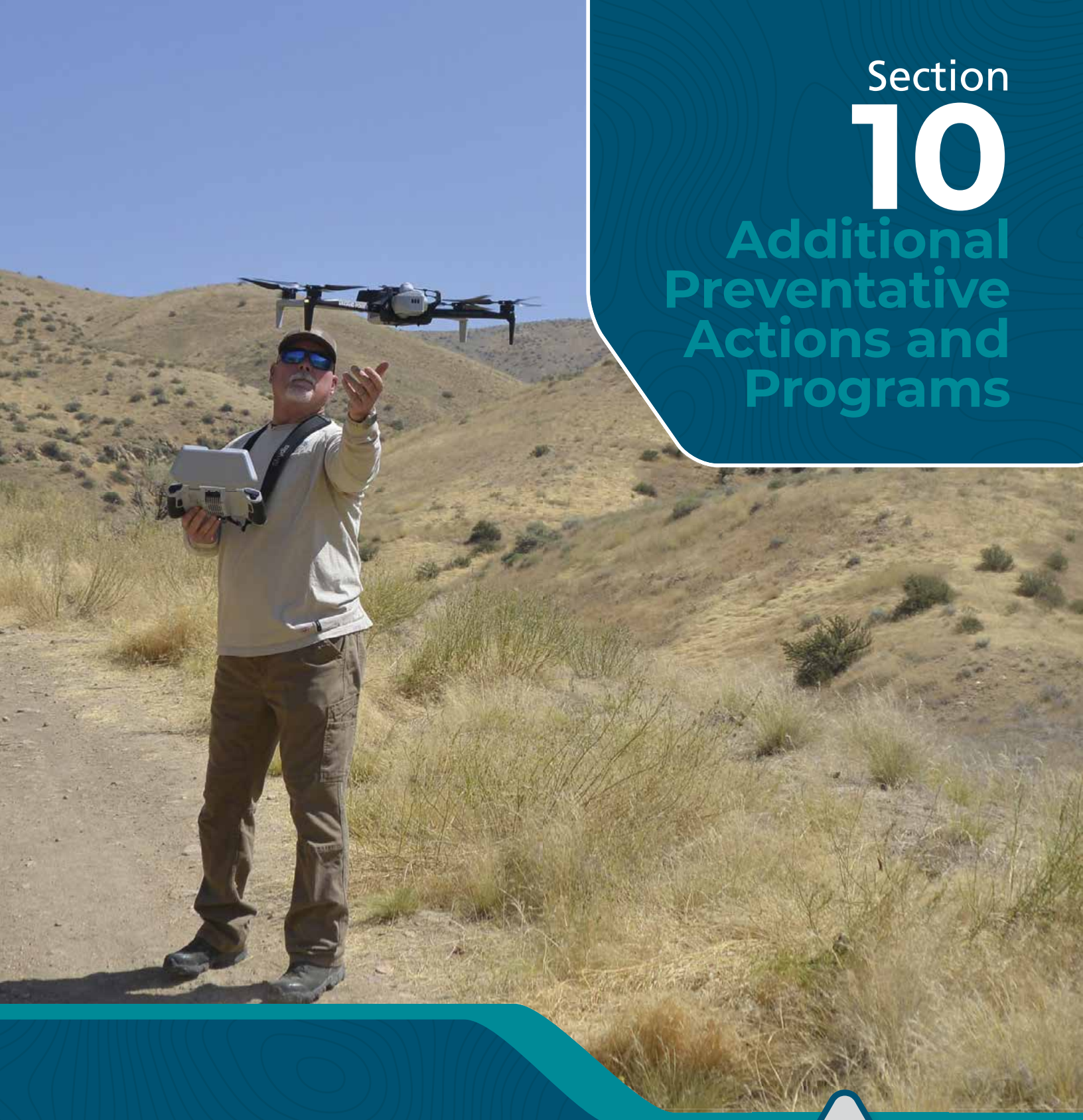
Idaho Power strives to maintain these clearance distances throughout the full pruning cycle through the activities described above.

9.4.4. Distribution Line 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 sample of Vegetation Mitigation worksites for distribution lines. Audits are performed through a combination of contracted arborists and Idaho Power's internal arborists. In wildfire risk zones, audits are performed on all pruning work for distribution lines. Auditors check if pruning cuts meet specification and proper clearance was achieved. 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 clears vegetation from the base of certain transmission wood poles and a limited number of distribution wood poles in Idaho. These vegetation clearing practices help mitigate 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 clears existing vegetation to the ground in a general 20-foot radius surrounding selected wood poles and applies an herbicide in a general 15-foot radius 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 in accordance with the *Wildland Fire Preparedness and Prevention Plan*. However, they are not professionally trained firefighters and are instructed not to place themselves in hazardous situations when responding to wildfires. During wildfire incidents, Idaho Power personnel take appropriate directions from the incident commander (IC) or other authorized fire response officials having jurisdiction over the incident.



Figure 16
Idaho Power crews working to replace poles damaged by a wildfire during 2026 wildfire season.

In addition, beginning in 2026, Idaho Power began employing internal seasonal wildfire operations specialists during wildfire season to support critical infrastructure protection, enhance situational awareness, and coordinate with wildfire incident command. In certain situations, Idaho Power may also utilize contracted personnel to help protect its critical infrastructure. Idaho Power deploys these resources on a case-by-case basis at its discretion.

10.2. Wood Pole Mesh Wrap

Idaho Power installs pole mesh wrap on selected wood transmission structures as an asset hardening measure designed to improve wildfire resilience. The non-combustible mesh barrier is installed around the lower portion of the pole to help protect the structure from direct flame exposure and reduce the likelihood of pole loss during wildfire events. By enhancing pole survivability, mesh wrap supports system reliability and may reduce wildfire-related repair and replacement costs.

Installation efforts are primarily focused within wildfire risk zones; however, Idaho Power, at its discretion, may utilize mesh wrap in other areas based on operational needs, infrastructure risk, wildfire history, and system reliability considerations. Costs and targets associated with mesh wrap deployment are provided in Appendix F.

10.3. Pilot Projects

Idaho Power uses pilot projects to evaluate emerging technologies, operational practices, and mitigation approaches that may reduce wildfire risk, improve system reliability, or enhance operational effectiveness. Pilot projects provide an opportunity to assess implementation requirements, operational performance, costs, and potential risk reduction benefits before broader deployment. 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.

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

Pilot Description	Evaluate dedicated helicopter availability during wildfire season for outage response, patrols, construction, restoration, and situational awareness.
Evaluation Metrics	Utilization hours, supported events, restoration performance, operational flexibility, situational awareness benefits, and annual cost-benefit review.
Estimated Duration	2024–2029
Estimated Annual Cost	Approximately $287,000

10.3.2. Wildfire Resilience Partnerships and Fuels Reduction Shared Stewardship (Pilot)

Pilot Description	Evaluate collaborative fuels reduction projects and landscape-scale wildfire resilience efforts.
Evaluation Metrics	Acres treated, stakeholders engaged, funding leveraged, infrastructure benefits, and partnership outcomes.
Estimated Duration	2023–2029
Estimated Annual Cost	Approximately $72,000

10.3.3. Line Monitoring Technology (Pilot)

Pilot Description	Evaluate advanced line monitors and their ability to enhance situational awareness and fault analysis.
Evaluation Metrics	Detection accuracy, transitory fault identification, post-event analysis value, and workflow integration.
Estimated Duration	2025–2029
Estimated Annual Cost	Approximately $200,000

10.3.4. Covered Conductor (Pilot)

Pilot Description	Evaluate constructability, maintenance requirements, operational performance, and applicability of covered conductor, including 12.5-kV and 34.5-kV distribution installations.
Evaluation Metrics	Construction performance, operational experience, tooling requirements, maintenance observations, reliability performance, and installation costs.
Estimated Duration	2023–2028
Estimated Annual Cost	Approximately $2,000

10.3.5. 3-D Pole Loading (Pilot)

Pilot Description	Evaluate pole-loading analytics and structural assessment methodologies.
Evaluation Metrics	Engineering usefulness, deficiencies identified, model accuracy, and decision-support value.
Estimated Duration	2023–2027
Estimated Annual Cost	Approximately $72,000

10.3.6. High Impedance Relay Protections (Pilot)

Pilot Description	Evaluate high impedance fault detection capabilities and reduction of false positives.
Evaluation Metrics	Detection accuracy, false-positive rates, validated events, and operational effectiveness.
Estimated Duration	2025–2029
Estimated Annual Cost	N/A

10.3.7. UAS Aerial Inspection (Pilot)

Pilot Description	Evaluate UAS-based inspections, imagery management, and AI-assisted image review.
Evaluation Metrics	Poles inspected, defects identified, review efficiency, data quality, and workflow integration.
Estimated Duration	2025–2027
Estimated Annual Cost	Approximately $867,000

Section

11

Public Outreach and Engagement



WMP

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:

- 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.
- Raise awareness about Idaho Power's wildfire mitigation work.
- 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. This campaign promotes the company's wildfire mitigation activities and customer outage communication, provides awareness and education on preparing for wildfire season, and publicizes 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, such as:

- State of Idaho Emergency Support Function 12 (ESF-12)
- County emergency managers
- LEPCs
- Other public safety partners

- Local elected officials
- Health and human service agencies

Through individual conversations, larger presentations, and public events, Idaho Power communicates about its wildfire mitigation efforts 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 events 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, including PSPS
- Idaho Power's wildfire mitigation efforts
- Strategies to prevent wildfires
- Options to help customers manage their Idaho Power account(s) and stay informed, including Idaho Power's app and outage alerts

11.2.3.1. Vulnerable Customers

To ensure messaging reaches vulnerable customers, Idaho Power collaborates with community organizations focused on providing services and supplies to vulnerable customers 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.

11.3. Event-Specific Communication

During PSPS 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 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 Idaho Power's approach for the next year.

11.5. Timing of Outreach

Wildfire-related outreach occurs primarily before and during wildfire season. Holding key communications until wildfire is more prominent 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. As 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 company's 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 mitigation-related content to employees in a variety of ways:

- *News Scans* (internal newsletter for all employees)
- Emails
- Leader communications
- Online training for employees about the WMP
- Required In-person and virtual 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 includes specific activities intended 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 response plans.

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

12.2. Government Engagement

Prior to the start of wildfire season, Idaho Power meets with interested 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 identify and work toward mutually beneficial activities that may be considered in subsequent WMPs.

In 2026, Idaho Power continued to serve as a co-chair for the Southwest Idaho All-Lands Partnership. This group is a coalition of federal and state land-management agencies, counties, cities, businesses, nonprofits, and community members working together to pool expertise and resources to collaboratively plan and implement landscape-scale wildfire mitigation work across private and public lands.

The company also remains an engaged participant in the IFCIC, supporting statewide coordination and integration of wildfire detection technologies. Idaho Power further participates in the Idaho Office of Emergency Management's Drought and Wildfire Technical Working Group, providing technical expertise to support wildfire planning and risk assessment efforts, including development of the State Hazard Mitigation Plan. In addition, Idaho Power maintains regular engagement with county emergency managers, LEPCs, public safety agencies, elected officials, and other key stakeholders to strengthen coordination, information sharing, and emergency preparedness before and during wildfire season.

12.3. Industry and 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, Portland General Electric (PGE), Pacific Power, Chelan County Public Utility District (Chelan

PUD), Puget Sound Energy (PSE), Xcel Energy, NV Energy, Bonneville Power Administration (BPA), Northwestern Energy, SDG&E, Southern California Edison (SCE), Pacific Gas and Electric (PG&E), Sacramento Municipal Utility District (SMUD), and Liberty Electric.

Prior to the start of the 2026 wildfire season, Idaho Power attended multiple conferences, workshops, and meetings where it engaged many of the utilities listed above in the sharing of WMP learnings, common challenges, and innovative solutions for minimizing wildfire risk. In the spring of 2026, Idaho Power's Wildfire Mitigation Team attended industry conferences hosted by Western Energy Institute (WEI) and Northwestern Energy in Bozeman, Montana, as well as the Edison Electric Institute (EEI) and PG&E Utility Wildfire Mitigation Conference in Concord, California. Leadership from Idaho Power's wildfire team also participated in a wildfire mitigation focused panel with SDG&E, SCE, and PG&E during the Western Underground Committee Conference.

Additionally, Idaho Power continues to be a member of trade-based organizations that offer wildfire-specific forums and discussions, including the International Wildfire Risk Management Consortium (IWRMC), EEI, and 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 & Construction in IWRMC's Executive Strategy Forums.

Idaho Power's chief executive officer (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 and Metrics



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. Additionally, Idaho Power will annually submit a compliance report regarding its most recently approved WMP to the IPUC, consistent with the schedule and standards adopted in Order No. 36929, unless the IPUC directs otherwise.

13.3. 2026 Lessons Learned

13.3.1. Community Outreach and Engagement

In 2026, Idaho Power refined its community outreach strategy based on lessons learned from prior outreach efforts. During 2025, Idaho Power hosted 26 in-person and virtual outreach events focused on outage preparedness, wildfire mitigation, and PSPS education. Attendance data showed that Idaho Power-hosted open houses averaged approximately eight participants per event, while community-partner-led events often attracted more than 300 attendees. To better understand customer preferences, Idaho Power conducted two surveys: one distributed to open-house attendees and a second distributed through the company's Empowered Community customer feedback panel. Survey results indicated that 62% of customers preferred virtual engagement opportunities when available, and 46% reported they would be more likely to participate if Idaho Power partnered with local organizations. These findings reinforced the value of accessible, flexible engagement formats and trusted community partnerships, leading Idaho Power to shift its 2026 outreach approach toward a combination of virtual meetings and collaborative community-based events to expand customer reach and participation.

Between January and August of 2026, Idaho Power participated in over 20 in-person and virtual outreach events across its service area. While community participation levels varied by event, Idaho Power estimates it may have reached as many as 10,000 individuals through its participation in these events.

Between May and June, Idaho Power also hosted virtual meetings in English and Spanish, including specialized outreach opportunities for customers with medical and/or mobility needs.

Recorded or online resources were made available through Idaho Power's website and customer communication channels to help extend outreach beyond live events.

Idaho Power continued to gather customer feedback during the 2026 outreach season through surveys and direct conversations at community events. Feedback generally reinforced the value of partnering with established community organizations and providing flexible engagement options. Customers also expressed appreciation for receiving practical information on wildfire mitigation, outage preparedness, emergency planning, and PSPS operations in settings that were convenient and accessible.

The company's 2026 outreach efforts in Idaho are summarized in Table 8.

Table 8
Idaho Power's 2026 WMP outreach efforts

Date	Time	County	City	Event & Location
March 7	9 a.m.–1 p.m.	Ada	Meridian	Family Preparedness Fair Church of Jesus Christ Latter-day Saints 4505 N, Linder Rd., Meridian, ID
March 26–28	12 p.m.–9 p.m. Thu/Fri 10 a.m.–7 p.m. Sat	Bannock	Pocatello	Pocatello Spring Fair Idaho State University ICCU Dome 550 Memorial Dr., Pocatello, ID
April 11	10 a.m.–2 p.m.	Gem	Emmett	Gem County Emergency Preparedness Fair 980 West Central Rd., Emmett, ID
April 18	11 a.m.–3 p.m.	Bannock	Pocatello	Portneuf Valley Environmental Fair Lookout Point 426 West Lewis St., Pocatello, ID
May 2	11 a.m.–2 p.m.	Valley	McCall	Valley County Wildfire Preparedness Day Donnelly Fire Department 244 W Roseberry Rd., Donnelly, ID
May 12–14	8 a.m.–5 p.m. each day	Bannock	Pocatello	Safety Fest of the Great Northwest Pocatello ISU Rendezvous Complex 111 Martin Luther King Jr Wy., Pocatello, ID
May 13	6 p.m.–7 p.m.	Southern-Eastern: Virtual Event—Outage Preparedness—Our Wildfire Prevention Efforts—Public Safety Power Shutoffs		
May 14	6 p.m.–8 p.m.	Boise	Garden Valley	Garden Valley Wildfire Preparedness Event
May 16	10 a.m.–2 p.m.	Ada	Boise	Idaho Firewise Garden Open House Preparedness Fair Old Penitentiary Ave., Boise, ID

Date	Time	County	City	Event & Location
May 16–17	9 a.m.–5 p.m.	Elmore	Mountain Home	Mountain Home Air Show at the Mountain Home Air Force Base
May 19	5:30 p.m.–8:30 p.m.	Twin Falls	Twin Falls	Outage Preparedness and Wildfire Mitigation Town Hall—Twin Falls & Jerome counties Canyon Ridge High School 300 N College Rd W, Twin Falls, ID
May 20	6 p.m.–7 p.m.	Capital Canyon-West: Virtual Event—Outage Preparedness—Our Wildfire Prevention Efforts—Public Safety Power Shutoffs		
May 23	9 a.m.–1 p.m.	Lemhi	Salmon	Lemhi County Farmers Market, Veterans Memorial Park—corner of Main and Water Streets Downtown Salmon, ID
June 3	6 p.m.–7 p.m.	Spanish Virtual Event—Outage Preparedness—Our Wildfire Prevention Efforts—Public Safety Power Shutoffs		
June 4	4 p.m.–7 p.m.	Ada	Meridian	Meridian Public Works Preparedness Event Meridian City Hall Plaza 33 E Broadway Ave., Meridian, ID
June 6	10 a.m.–2 p.m.	Blaine	Hailey	Hailey Farmers Market Outage Preparedness Booth—Roberta McKercher Park, Hailey, ID 83333
June 6–7	8 a.m.–5 p.m. Sat. 10:30 a.m.–4 p.m. Sun	Owyhee County Outpost Days—17085 Basey St. Murphy, ID		
June 10	12 p.m.–1p.m.	Virtual Event (Idaho) for Vulnerable Populations		
June 10	12 p.m.–4 p.m.	Blaine	Ketchum	Ketchum Farmers Market Outage Preparedness Booth Forest Service Park 131 River St E, Ketchum, ID
June 13	10 a.m.– 12 p.m.	Ada	Eagle	"Plan, Prepare, Protect"-Hidden Springs/Cartwright Ranch Residents 5876 W. Hidden Springs Dr., Boise, ID
June 16	12 p.m.–2 p.m.	Elmore	Pine	Red Cross Wildfire Workshop Pine Senior Center 350 N Pine–Featherville Rd., Pine, ID
June–August	Saturdays 9 a.m.–2 p.m.	Nampa Farmer's Market—Lloyd Square Park, Nampa, ID		
June–August	Tuesdays 5 p.m.–8 p.m.	Caldwell Farm to Fork Farmer's Market—Indian Creek Plaza, Caldwell, ID		
July 25	10 a.m.–2 p.m.	Boise |Wilderness Ranch| Community Event—Southeast Boise County Emergency Services, Infrastructure, Evacuation Event		

As Idaho Power prepares for the 2027 wildfire season, insights gathered through customer surveys, event participation, and direct community feedback will be used to inform the company's 2027 outreach strategy.

13.3.2. Aerial Inspections

In 2025, the company launched its first-year aerial inspections pilot project using 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 2025 pilot project utilized contractors to perform image collection, desktop inspections, and independent QA checks, with confirmed issues routed to Idaho Power for correction.

As aerial inspection activities expanded in 2026, Idaho Power gained additional insights regarding implementation of the program. Idaho Power continues to see value in continuing and expanding its UAS pilot based on its experiences in 2026. Further, Idaho Power recognized the importance of standardized image capture requirements to support consistent and efficient asset evaluations. In 2026, Idaho Power refined inspection protocols and developed standardized shot sheets that define required image angles and asset views to aid with image quality, review efficiency, and consistency. Idaho Power will continue this work in 2027.

As part of the pilot, Idaho Power is currently working with vendors to evaluate AI and machine-learning technologies that analyze inspection imagery and assist in the identification and classification of potential equipment deficiencies. Preliminary results suggest AI review may add value in this process. In 2027, Idaho Power will continue to compare AI-identified results with traditional review methods to better understand the technology’s capabilities, limitations, and potential applications.

Based on lessons learned from the pilot and subsequent program expansion, Idaho Power increased its aerial inspection target from approximately 10,000 distribution poles in 2026 and plans to inspect approximately 15,000 distribution or transmission poles in wildfire risk zones during 2027.

13.3.3. PSPS Event Management Tools and Exercise

Based on learnings from 2025, Idaho Power implemented several enhancements to its Event Management Software (EMS) to strengthen PSPS readiness and execution capabilities for 2026. These enhancements focused on data management, information verification, and communications processes, including the addition of a weather ensemble viewer to enhance situational awareness and support decision-making during potential PSPS events.

Prior to the 2026 wildfire season, Idaho Power conducted a three-day PSPS mock event. The exercise provided an opportunity to test and train on the tools, processes, and communication protocols that would be used during an actual PSPS event, strengthening readiness and validating operational workflows. The exercise included engagement with public safety partners and interested critical facilities, who, following the

mock exercise, highlighted the value of the Public Safety Partner Portal and associated data-sharing capabilities. Partners noted that the ability to visualize potentially impacted areas through the portal enhanced their situational awareness before, during, and after an event, while the inclusion of critical facility information supports effective emergency planning and coordination.

13.3.4. Internal Vegetation Management Crew

Beginning in 2024, Idaho Power began piloting an internal vegetation management crew for tree trimming and pruning activities. Idaho Power's internal vegetation management crew worked to develop local customer relationships and leverage access to the company's operational and customer systems in planning and execution. Investments in specialized equipment, including a large chipper with a winch for whole-tree processing, have increased productivity and enabled more efficient vegetation removal methods. Based on these successes, Idaho Power transitioned the pilot crew to a full-time, permanent program in 2026.

13.3.5. Wildfire Operational Response Team

In 2026, Idaho Power began utilizing internal seasonal wildfire operations specialists to support active wildfire events. The program demonstrated the value of proactive infrastructure protection and coordination with fire agencies and the respective incident command structure. During the 2026 wildfire season, the internal wildfire operational response team responded to approximately 32 wildfire incidents and helped save approximately 189 poles and structures through pre-suppression actions such as vegetation removal; grubbing; and application of water, foam, or retardant. One lesson learned by the company was that on-site coordination with the respective incident command structure can enhance asset protection outcomes. This initiative has underscored the effectiveness of early mitigation work, employees with former wildfire experience, and partnerships with incident management teams.

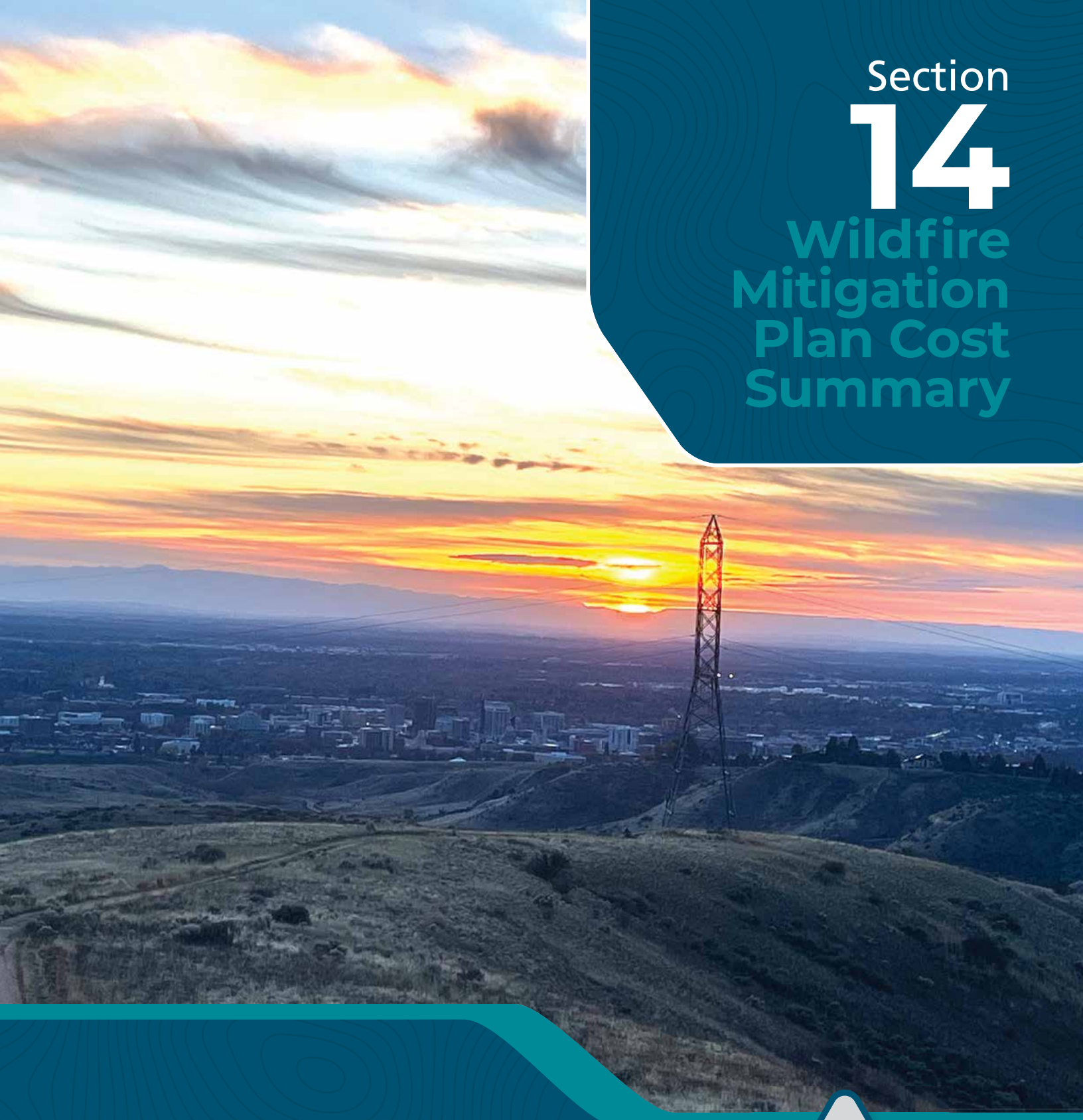
13.3.6. Helicopter Standby Pilot

Idaho Power continued its helicopter standby pilot program during the 2026 wildfire season, building on lessons learned from previous years. A lesson learned by the company has been aligning helicopter availability with wildfire conditions, considering the increasing competition for aviation resources. During 2026, Idaho Power observed that wildfire conditions and associated demand for aviation resources began emerging earlier in the season than anticipated. The company experienced instances where access to helicopter resources was limited prior to the commencement of the standby contract period. As a result, Idaho Power will continue evaluating the timing and duration of future standby contracts to better align with evolving wildfire conditions.

In 2026, Idaho Power utilized the standby helicopter on multiple occasions to support aerial patrols of distribution facilities located in remote areas, which, in those instances, reduced the time required to inspect lines and supported restoration efforts following outages. The helicopter was also utilized to support patrol and restoration of transmission facilities following

wildfire-related system impacts, as well as other construction activities during the standby period. The company has also learned the importance of maintaining operational flexibility when utilizing contracted aviation resources. Although the standby contract provides dedicated access to aerial resources, flight operations may occasionally be affected by maintenance requirements, weather conditions, or other operational considerations, such as temporary flight restrictions in active wildfire areas.

Based on lessons learned from the pilot, Idaho Power plans to continue utilizing a helicopter standby contract during the 2027 wildfire season and will evaluate whether adjustments to the timing of the standby period are warranted to better align with changing wildfire conditions. In 2027, the company anticipates continuing to use helicopter resources, when available and practical, to support outage response, post-event patrols, system restoration activities, and other operational needs where rapid aerial access can aid situational awareness and reduce restoration times.



Section

14

Wildfire Mitigation Plan Cost Summary

14. WMP Cost Summary

In 2027, Idaho Power estimates spending approximately $51 million in operations and maintenance (O&M) expenses in Idaho to further wildfire mitigation measures. Table 9 summarizes the company's planned O&M expenditures associated with executing its 2027 Idaho and Montana WMP. Estimated amounts reflect the company's best estimates. 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 (Table 3). Capital investment programs are summarized in Table 10.

Table 9
Estimated O&M expenses for wildfire mitigation, $000s

Wildfire Mitigation Program Description	2027 Forecast
A. Geographical Risk Assessment	
Risk Modeling—Risk maps, fire simulation, probabilistic model development, and support	$2,273
B. Situational Awareness and Monitoring	
Weather forecasting—System development and support, data services, climatology	$96
Weather forecasting personnel—FPI and PSPS	$172
Weather forecasting—Weather station maintenance	$219
Pole loading modeling & assessment (Contract service)	$72
Wildfire detection cameras	$288
C. Workforce Preparedness	
Tools/Equipment	$19
IWRMC	$40
D. Transmission & Distribution Programs	
O&M component of capital work	$493
Annual O&M T&D patrol maintenance repairs	$125
Transmission thermography inspection mitigation	$48
Distribution thermography inspection mitigation	$48
Thermography technician personnel	$164
Transmission wood pole fire-resistant wraps	$239
Wildfire Mitigation Program labor	$1,242
Patrolmen for wildfire pre-season inspections in wildfire risk zones	$431
Covered wire evaluation—Pilot program	$2

Wildfire Mitigation Program Description	2027 Forecast
Drone Beyond Visual Line of Sight Waiver for PSPS Patrols	$0
UAS (drone) Inspection Pilot	$867
E. Vegetation Management	
Transition to/maintain 3-year Vegetation Management Cycle (includes Enhanced Practices for Distribution Tier 3 & Tier 2 Risk Zones)	$42,134
Internal tree trimming crews	$769
Line clearing personnel	$197
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	$180
G. Line Operations Practices PSPS/Emergency Preparedness and Technology	
Communication/alert tool for PSPS customer alerts/extended use	$216
Fire suppression resources	$180
Standby helicopter service	$287
CRCs	$5
Total	**$51,050**

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 10
2026 WMP forecasted capital investments, $000s*

Mitigation Program	Program Description	2027 Planned in Service
Overhead Primary Hardening Program	Replacement and upgrades of hardware and equipment	$21,000
Strategic Undergrounding	Select conversion of overhead to underground distribution	$12,000
Recloser Segmentation and Communication Upgrades	Installation, relocation, and expanded communication for automatic reclosing overcurrent protection devices	$350
Wildfire Detection Cameras	Cameras enabled with AI to detect smoke and notify first responders	$35
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	$100

*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

Appendix A: Wildland Fire Preparedness and Prevention Plan

October 2026

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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 during wildfire season to mitigate the risk of wildfire resulting from general work practices. 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 geographic areas where IPC has infrastructure or equipment that IPC considers may be subject to a heightened risk of wildfire. 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) that forecasts the short-term fire threat 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 should generally be aware of current and forecasted weather and field conditions. The following process steps shall apply to IPC 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:
    - 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.
    - Once the FPI level for the work zone is identified, employ 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:
    - Be aware of the current and forecasted weather and the FPI level for the area where the work will be performed.
    - Once the FPI level for the WRZ is identified, proceed as follows for each FPI level:

- Green FPI in All Zones: Proceed with the work. Follow Prevention—Practices of Field Personnel (see Section 4 of this Plan).
- Yellow FPI in All Zones: Proceed with the work. Follow Prevention—Practices of Field Personnel (see Section 4 of this plan).
- Red FPI
  - **In Tier 2 Zone:** Proceed with the work. 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, follow Prevention—Practices of Field Personnel (see Section 4 of this plan).

		Tier 2	Tier 3
Fire Potential Index (FPI)	Higher 15–16 (Red)	Use Prevention—Practices of Field Personnel	STOP/NO WORK (unless exception authorized)
	Elevated 12–14 (Yellow)	Use Prevention—Practices of Field Personnel	Use Prevention—Practices of Field Personnel
	Normal 1–11 (Green)	Use Prevention—Practices of Field Personnel	Use Prevention—Practices of Field Personnel

3. Land Management Agency Restrictions

- Follow the requirements and restrictions of any wildfire restrictions-related order 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 IPC's discretion given the nature of the emergency or outage at hand.

3. Preparedness—Tools and Equipment

A. Required Tools and Equipment

Outside of wildfire season, all employees are required to carry standard tools and equipment in accordance with the IPC *Safety Standards* and Fleet Services.

During wildfire season, employees who are working in a WRZ are required to carry the tools and equipment listed below:

- 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 the initial attack, with an effective spraying mechanism (i.e., backpack pumps, water sprayer, etc.).

During wildfire season, employees working on construction or maintenance of 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, are additionally obligated to have at least one-on-site vehicle equipped with at least the following fire equipment

- Fire-suppression hand tools (i.e., shovels, rakes, Pulaskis, etc.).
- A 16- to 20-pound fire extinguisher.
- A 30- to 200-gallon mechanical fire pumper

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, IPC is generally not responsible for fighting fires. This responsibility remains with federal, state, and local firefighting organizations.

B. Required Personal Protective Equipment

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

In addition, IPC personnel are expected to comply with the requirements of the fire suppression agency managing a designated fire area. Regardless of the requirements of the fire suppression entity, IPC personnel entering a designated fire area will carry at least the following:

- 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

C. Land Management Agency Restrictions and Waivers

The Wildfire Mitigation 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 wildfire season include the following:

- BLM, USFS, and IDL Stage I or II Fire Restrictions: 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. During Stage II Fire Restrictions, IPC's Environmental Affairs department will obtain an appropriate waiver.

4. Prevention—Practices of Field Personnel

A. General Employee Practices

The following list identifies practices and behaviors employees shall employ while working in WRZs during wildfire season.

1. Participate in daily tailboards that include discussion around fire mitigation planning. Discussion topics may include, but are not limited to, the following:

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

2. Consider and evaluate weather conditions and terrain to be worked. Items to be considered must include, but are not limited to, the following:

    - Identify the FPI for the area being worked.
    - Monitor weather forecasts and wind and humidity conditions.
    - Identify surroundings (i.e., wildland-urban interface, BLM lands, Forest Service lands, proximity to any homes and structures, etc.).
    - Identify local fire departments and locations.
    - Evaluate the terrain being worked in (steep or flat).
    - Consider whether the work will take place during the day or at night.

3. Consider and evaluate work procedures and tools that have potential to cause a spark or flash. Items to be considered may include, but are not limited to, the following:

    - Performing energized work
    - Grinding or welding
    - Trees contacting electrical conductors
    - Hot saws
    - Chainsaws
    - Weed whackers
    - Sawzalls

4. Monitor the condition of the worksite throughout the project, including prior to leaving the work area for the night or before moving on to the next structure.

5. If employee cooking stoves are brought to the worksite, follow the following practices:

    - No open flames permitted
    - The stove or grill must be in good repair and of sturdy construction.
    - Stoves must be kept clean; grease build up is not allowed.
    - Fueling of the stove must follow the fueling procedures when liquid fuels are used.
    - Cooking must be in areas free of combustible materials.

6. If smoking on the job site, follow the following practices:

    - Do not discard any tobacco products from a moving vehicle.
    - Smoke only in designated areas and dispose of smoking materials in half-filled water bottles or coffee containers half-filled with sand. Smoking materials shall not be discarded on any site.

7. 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 must follow the vehicle-related processes set out below when working in WRZs during wildfire season.

1. Vehicle Procedures:

    - Regularly inspect engine exhaust, spark arresters, and electrical systems of vehicles used off road for debris, holes, or exposed hot components, and ensure heat shields and protective components are in place.
    - 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.
    - Park vehicles overnight in areas free from flammable vegetation at a minimum distance of 10 feet.
    - Vehicles and equipment should not be stationary in areas where grass, weeds, or other flammable vegetation will be in contact with the exhaust system. If there is no other workable option for a location that doesn't include weeds, grass, or other flammable vegetation, the vegetation and debris should be removed or a

fire-resistant material, such as a welding blanket, can be used to cover flammable material to act as a heat shield.

2. Fueling procedures:

    - Tools or equipment should NOT be fueled while running.
    - Allow a cool-down period to give equipment time to no longer be considered a fire risk.
    - Allow for a 10-foot radius from all ignition sources.
    - Clear any combustible debris from the immediate area.
    - Never smoke while fueling.

3. Combustion engine power tools:

    - Inspect spark arrester screens daily; clean or replace when clogged, damaged, or missing or remove from service until repaired for combustion engine power tools such as:
        - Generators
        - Pony motors
        - Pumps
        - Chainsaws
        - Hot saws
        - Weed whacker
        - Brush hog

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 that may enter a designated fire area are required to complete fire extinguisher and fire shelter training annually. 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.
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 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.

Wildfire Mitigation 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.

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 the vehicle operator.

Wildland Fire Preparedness Audit Checklist

Inspector _____

Signature _____

Date _____

Crew _____

Individual Vehicle

During wildfire season, each vehicle working in a WRZ is required to carry the following items:

- 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.).

Line Crew

During wildfire season, employees working on construction or maintenance of T&D are obligated to have at least one on-site vehicle equipped with at least 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

PPE: IPC and BLM standards

Each employee that enters a designated fire area is 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

Appendix B: Wildfire Public Safety Power Shutoff Plan

October 2026

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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 when Idaho Power facilities located within wildfire risks zones may be impacted by extreme weather. Depending on system configuration, implementation of a PSPS event may also require de-energization of facilities outside wildfire risk zone boundaries to safely isolate the electrical facilities serving the affected wildfire risk 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)—Liaison from a given state's designated emergency support function for energy utilities during an emergency.

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.[1]

Local Emergency Manager—A person assigned a role in a jurisdiction that oversees the day-to-day emergency management programs and activities.[2]

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

3. PSPS Implementation and Evaluation Considerations

Idaho Power will initiate the process that may ultimately result in a PSPS if the company determines a combination of anticipated 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 both in deciding whether to initiate the process that may ultimately result in a PSPS and in continuing to evaluate whether to proceed with the process that may ultimately lead to de-energization. The following subsections list the varying data sources Idaho Power may consider in deciding whether to initiate the PSPS process and in evaluating continuation, postponement, or termination of 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 wildfire 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 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

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

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

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.[3] 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 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): An NWS website providing weather, water and climate data, forecasts, and warnings for the United States for the protection of life and property. The Fire Weather page provides a daily and weekly view of multiple weather and environmental conditions influencing wildfire activity.

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

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, and the NWS National Oceanic and Atmospheric Administration's (NOAA) Weather and Hazards Viewer.[4]

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 wildfire 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.

[4] NOAA, Weather and Hazards Viewer, https://www.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. Idaho Power will consider forecasted windspeeds in the context of deciding whether to initiate the process that may lead to PSPS.

4. De-Energization Decision-Making

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 public safety, such as firefighting activities, emergency communications, and essential services.

Idaho Power's decision to de-energize will be based on the totality of the circumstances, including the sources of data listed above in Section 3 and any field observer observations (discussed further in Section 5.2), 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, 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 any of the following occur:

- 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 *2027 Operational Wind Speed Guidelines for EPSS 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 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 Powerline Safety Settings (EPSS) 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 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.

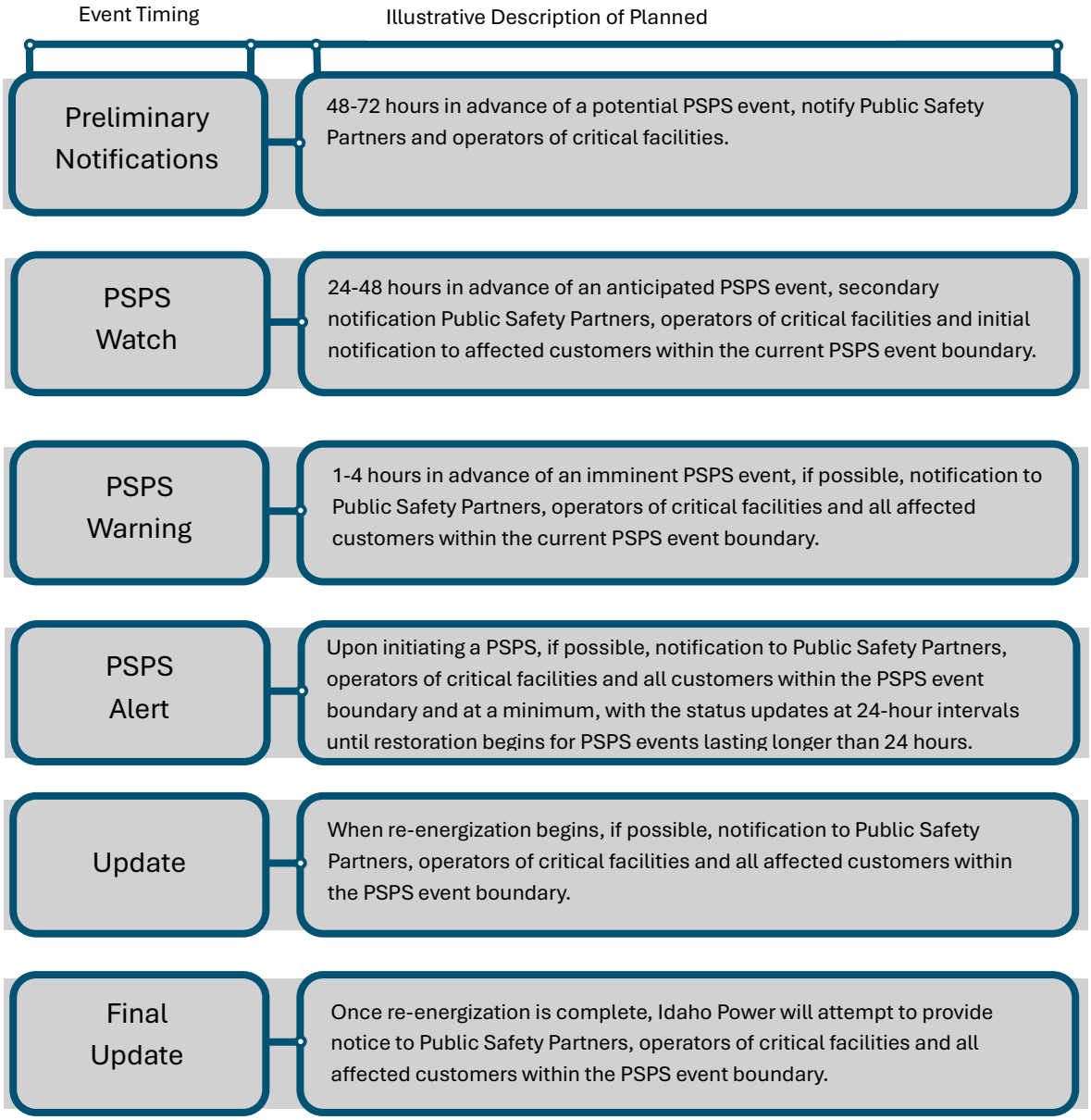
Idaho Power's PSPS program includes employees acting as field observers to report on site conditions. Idaho Power typically deploys trained field observers to strategic locations, including areas with limited weather and system condition visibility, before a weather system is forecasted to arrive at wildfire risk zone to perform field observations for on-the-ground, real-time information to inform PSPS de-energization decisions. 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.

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.

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. Additionally, Idaho Power customer service representatives (CSR) are provided with several resources, including PSPS talking points, scripts, and employee trainings to support customers in a potential or actual PSPS scenario. CSRs also use and guide customers to the public facing PSPS resources on the Idaho Power website.

As referenced with the illustration below, 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 considerations 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 determined 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, while incorporating feedback following the exercise
- 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
- Including ESF-12, public safety partners, and/or critical facilities

Appendix C
Wildfire Risk Zone Map Book

Appendix C.
Wildfire Risk Zone
Map Book

October 2026

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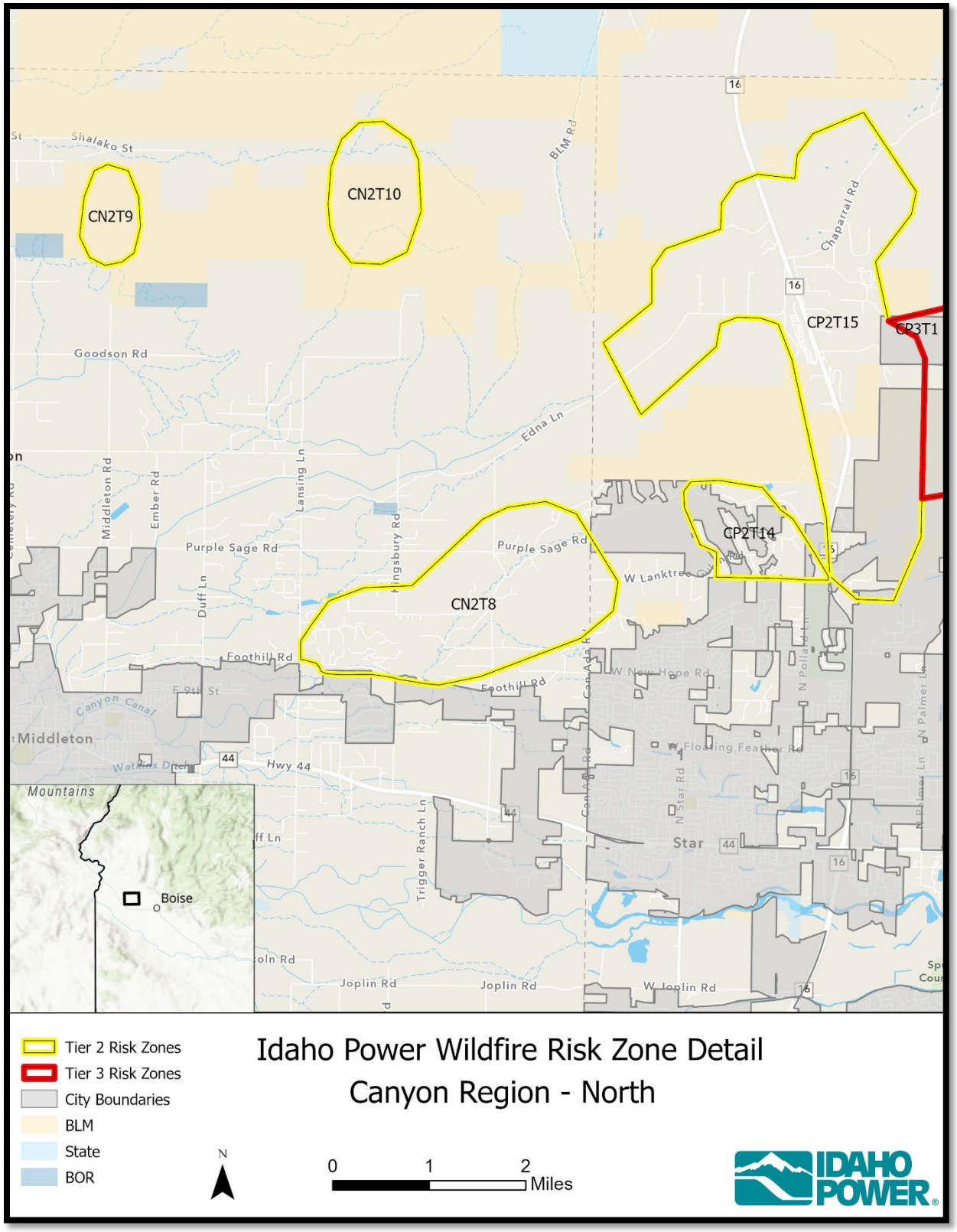


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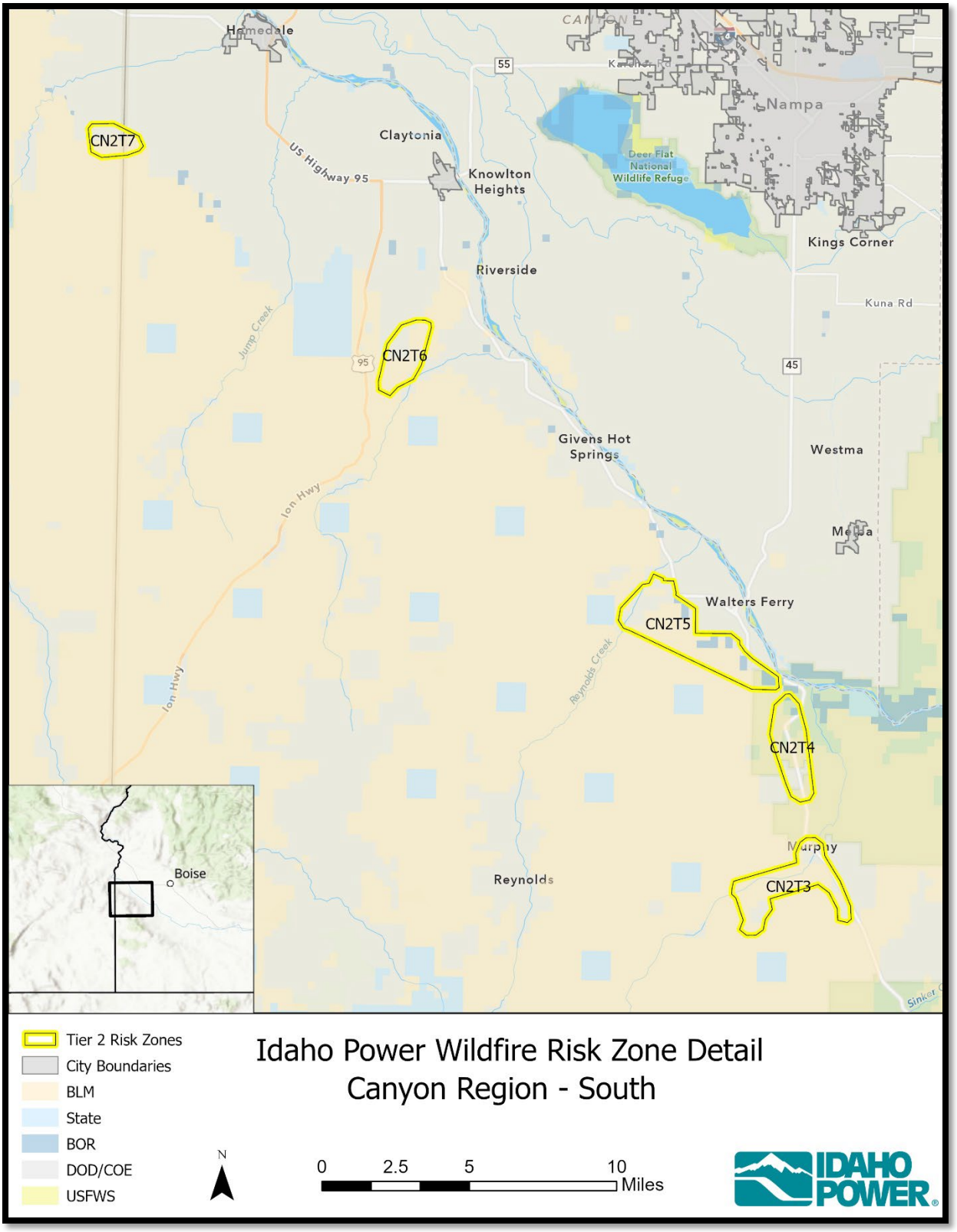


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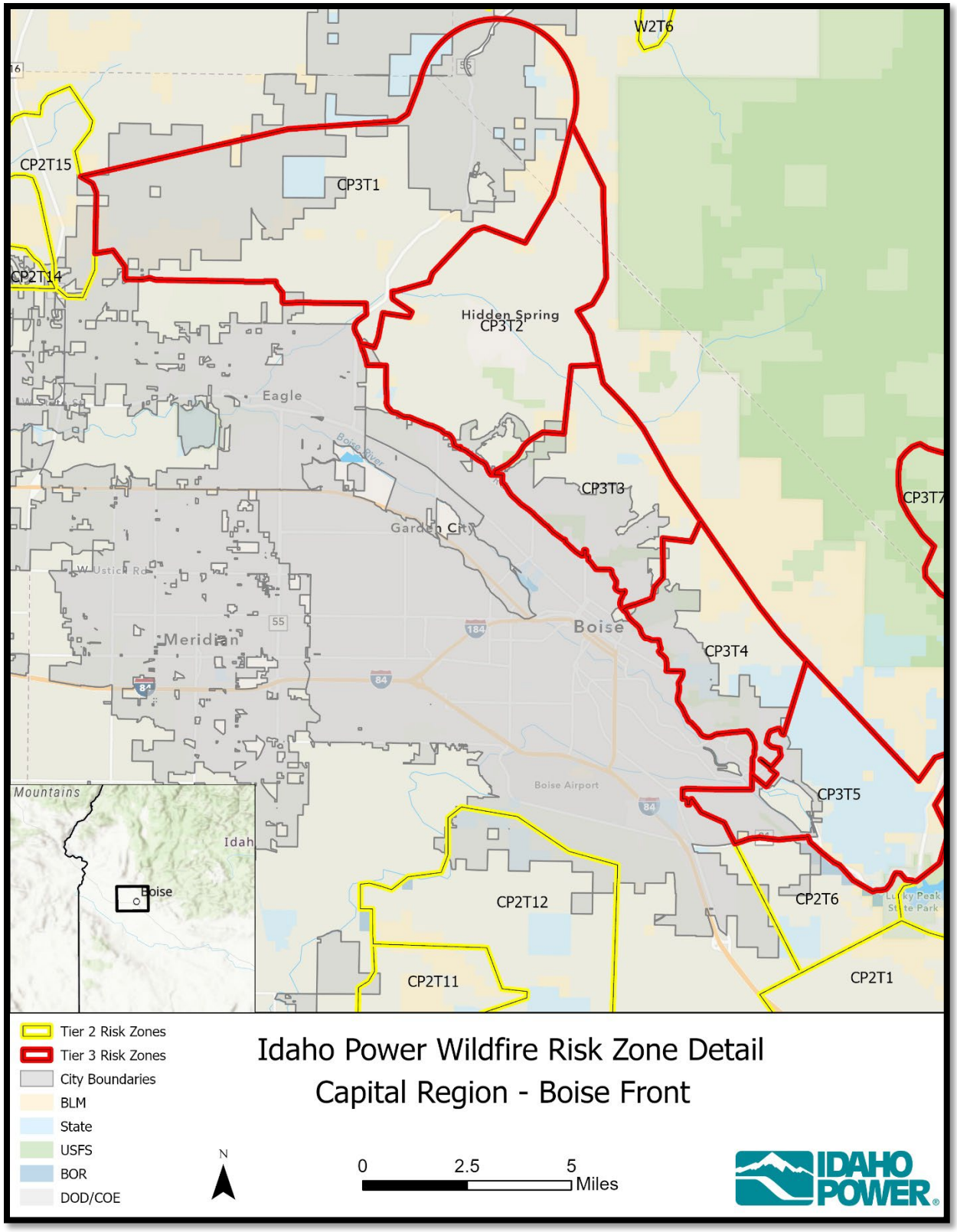


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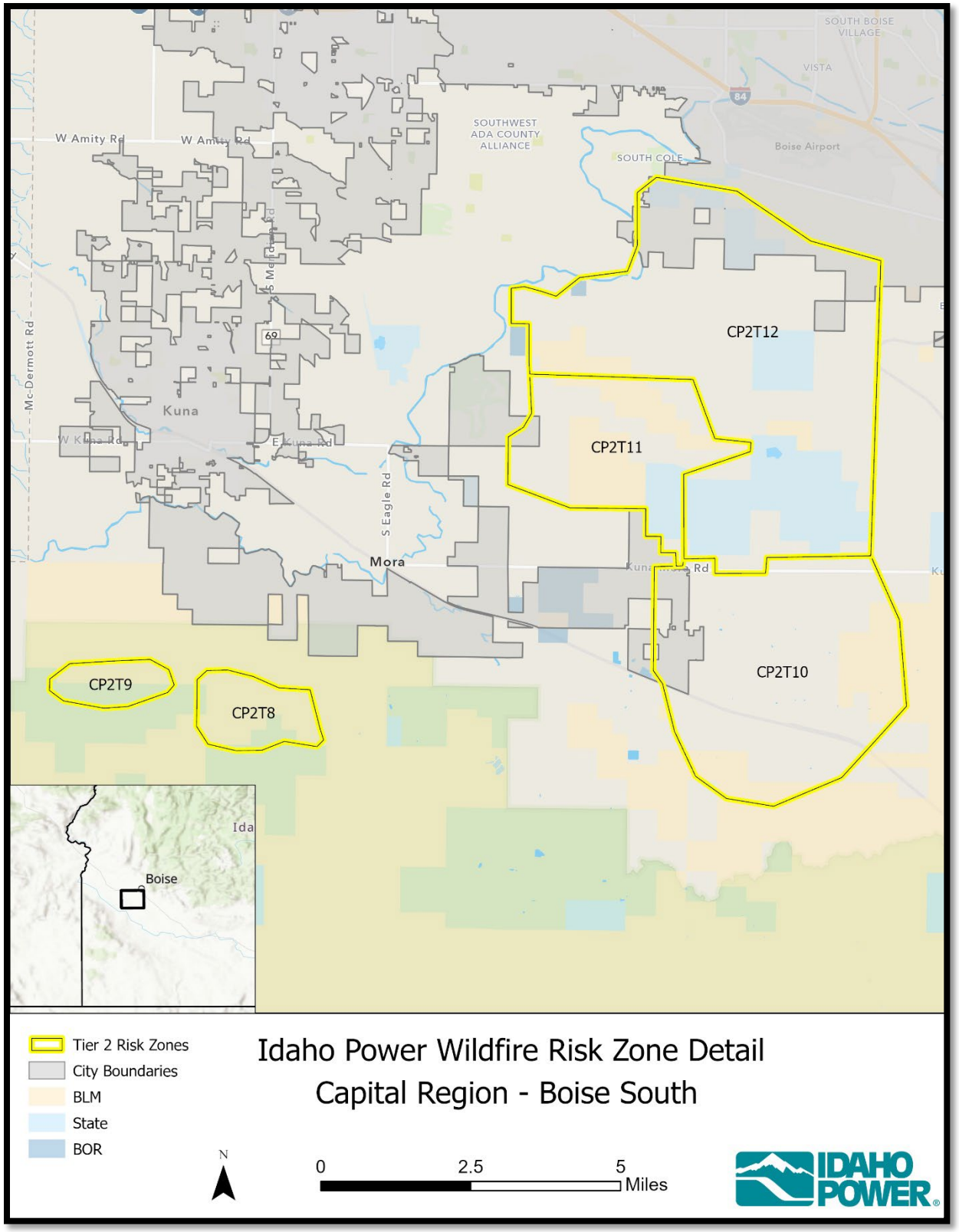


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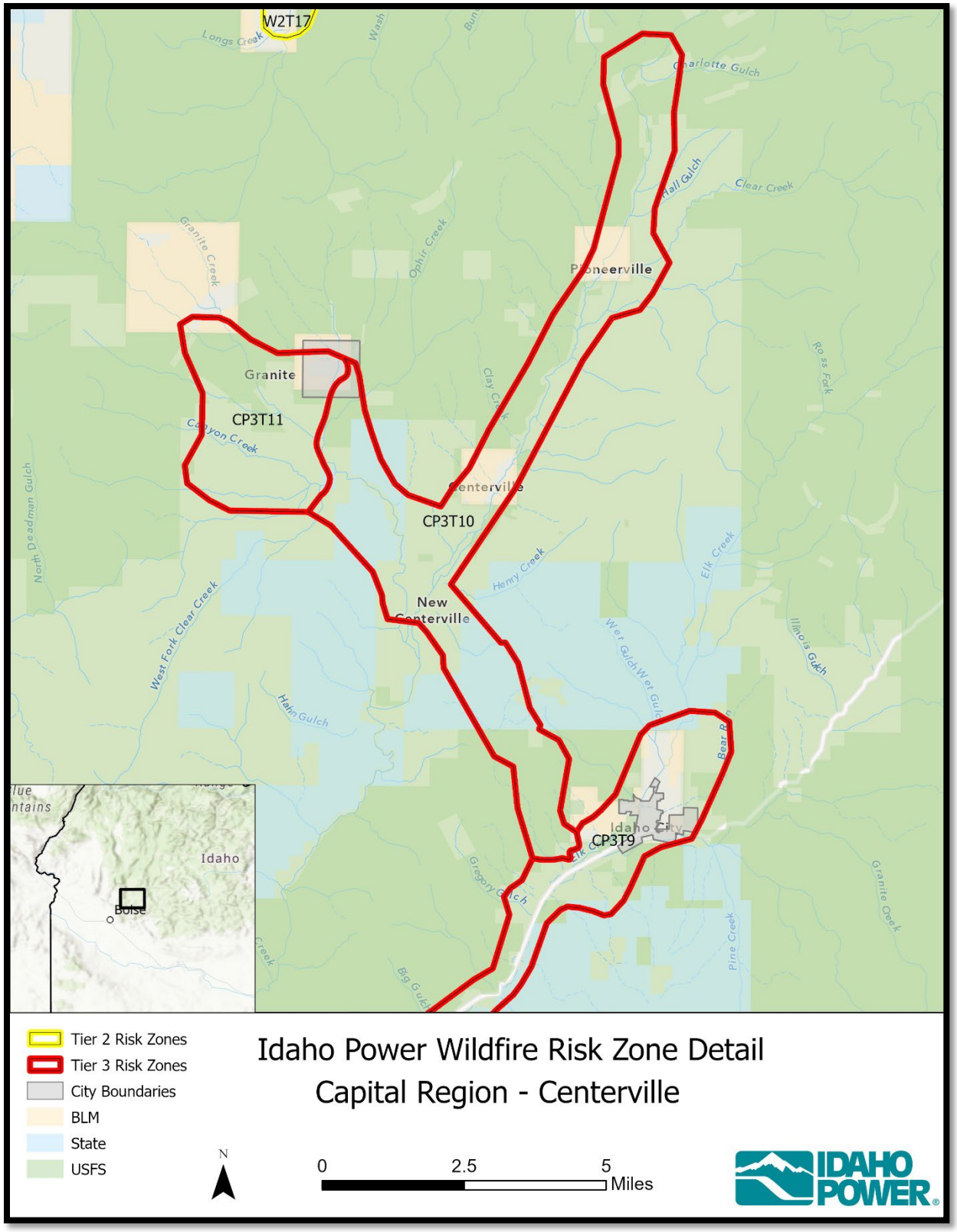


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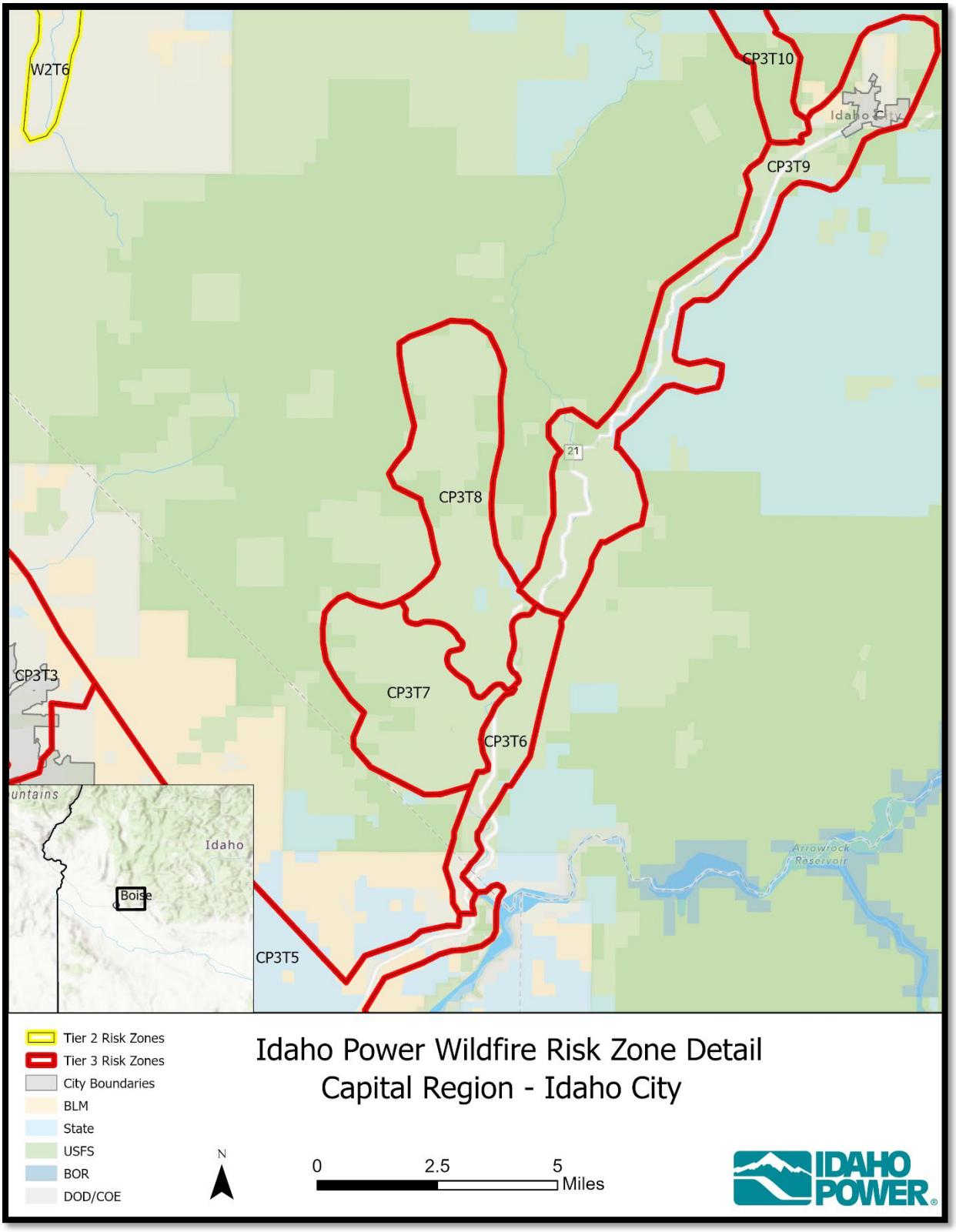


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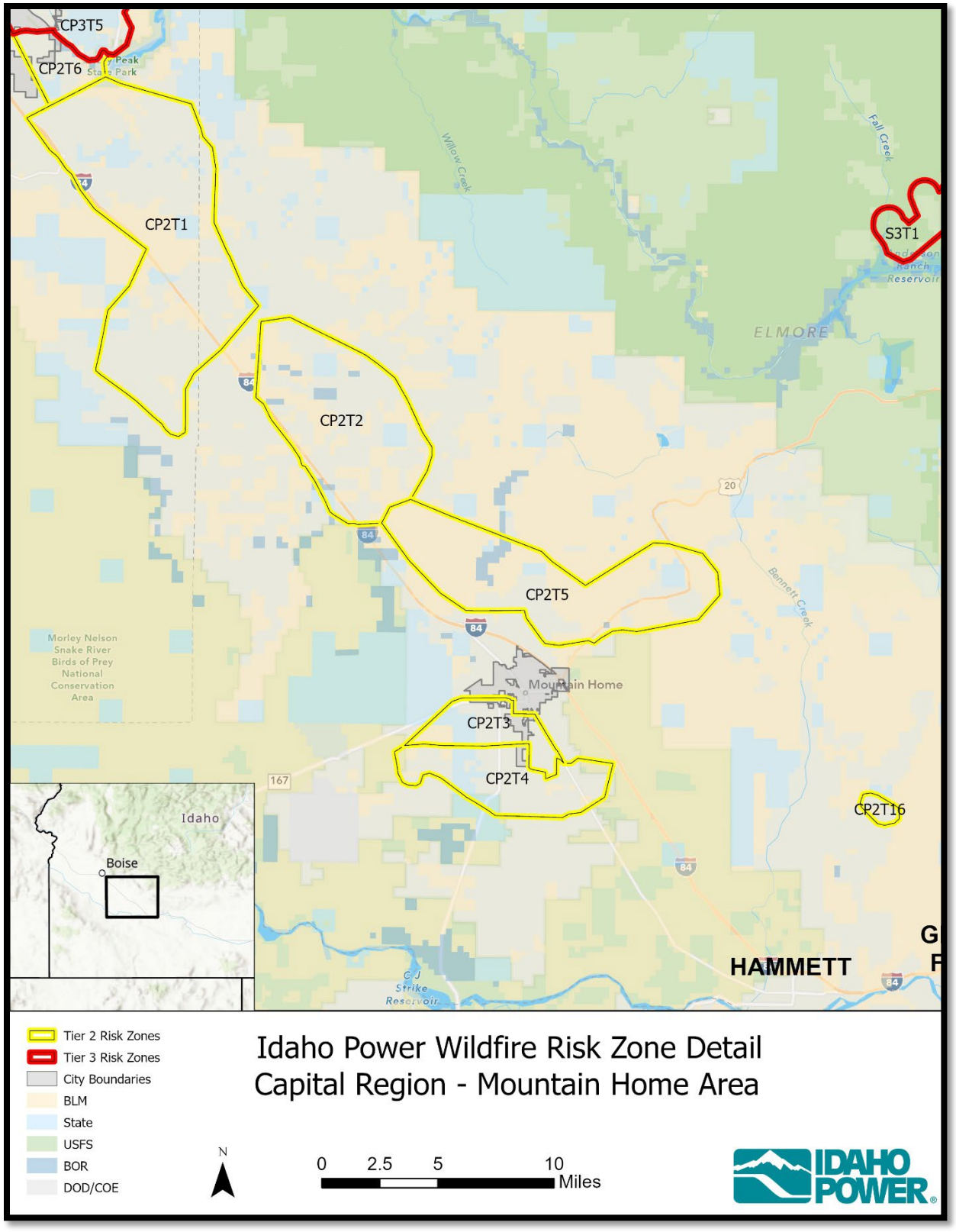


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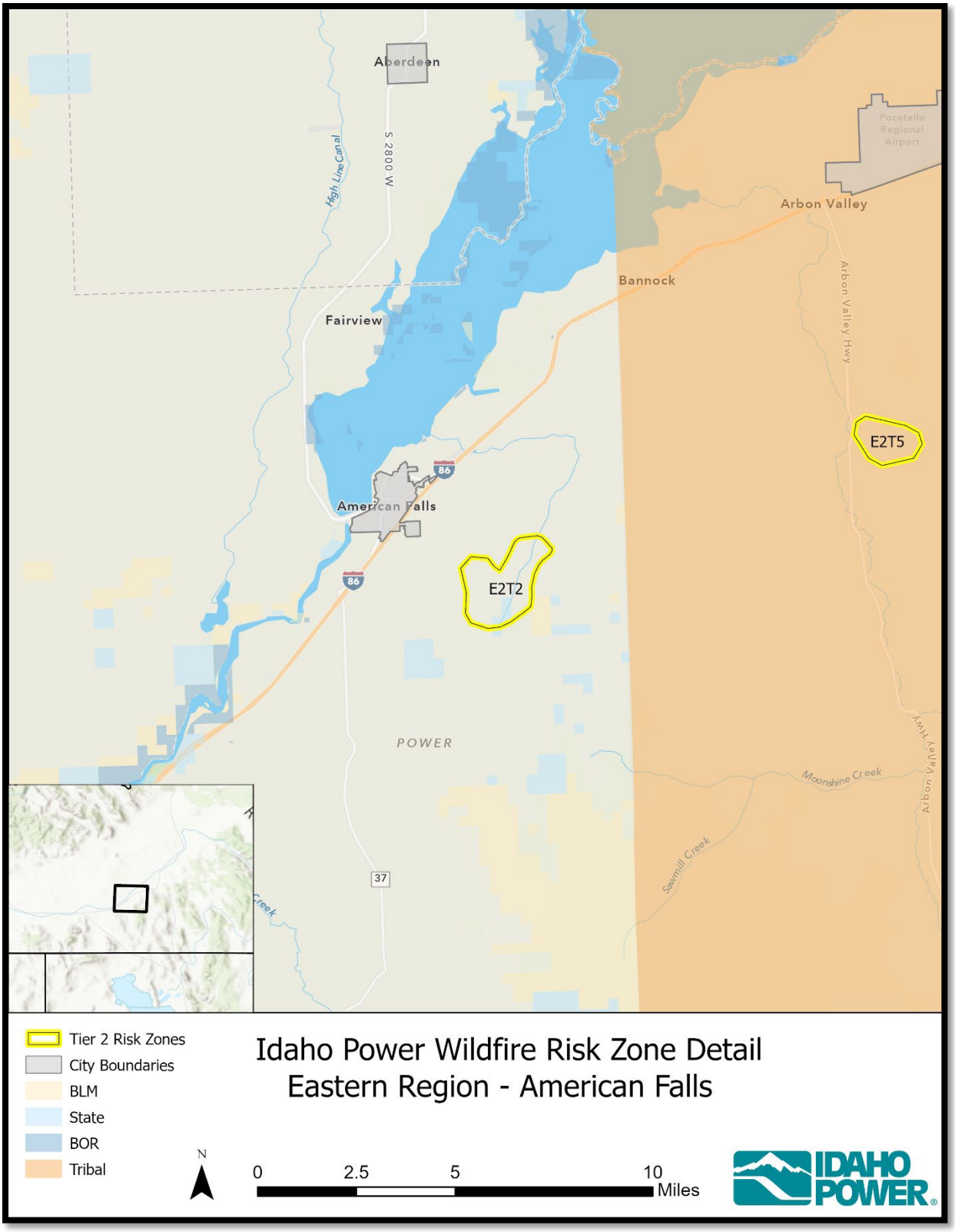


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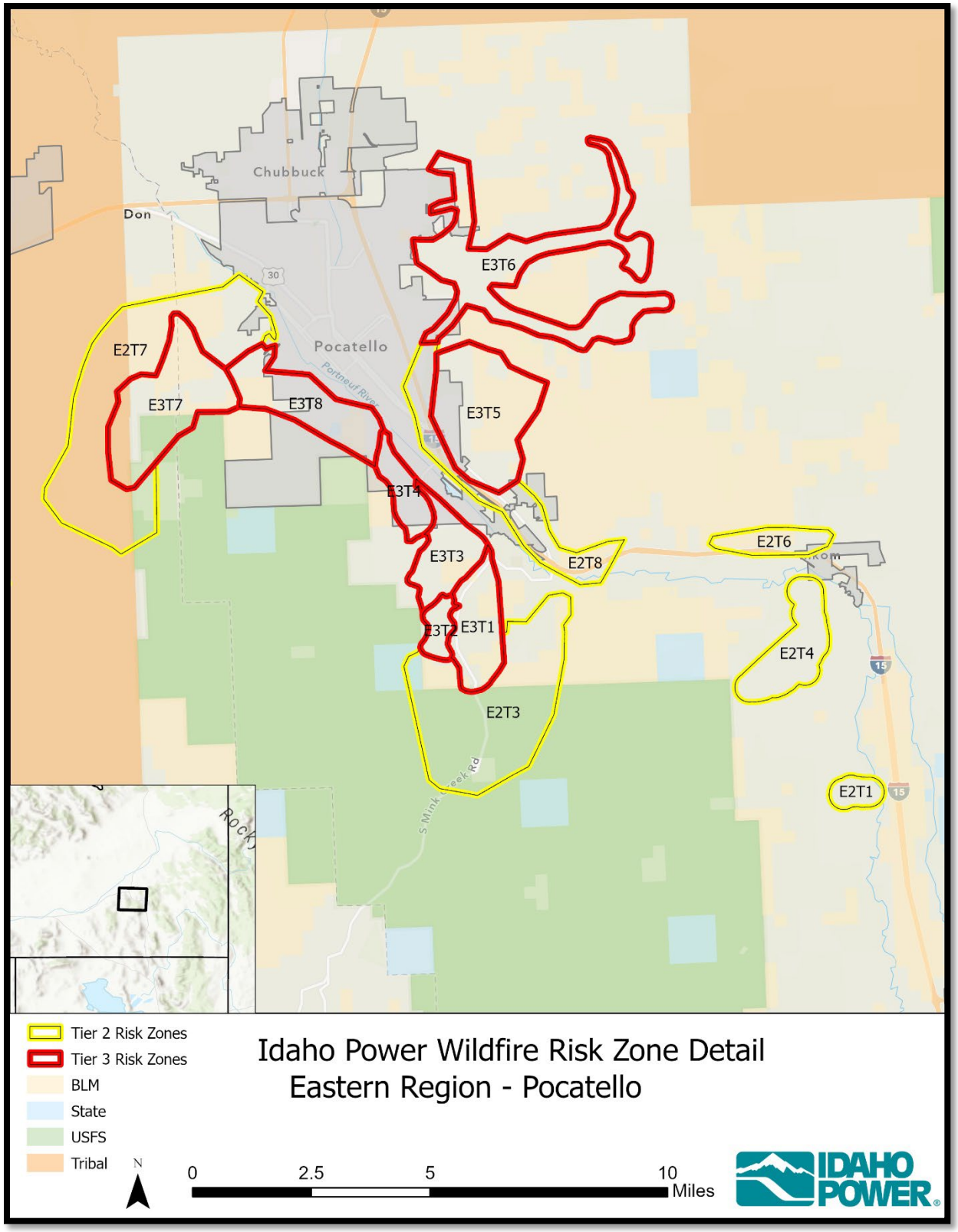


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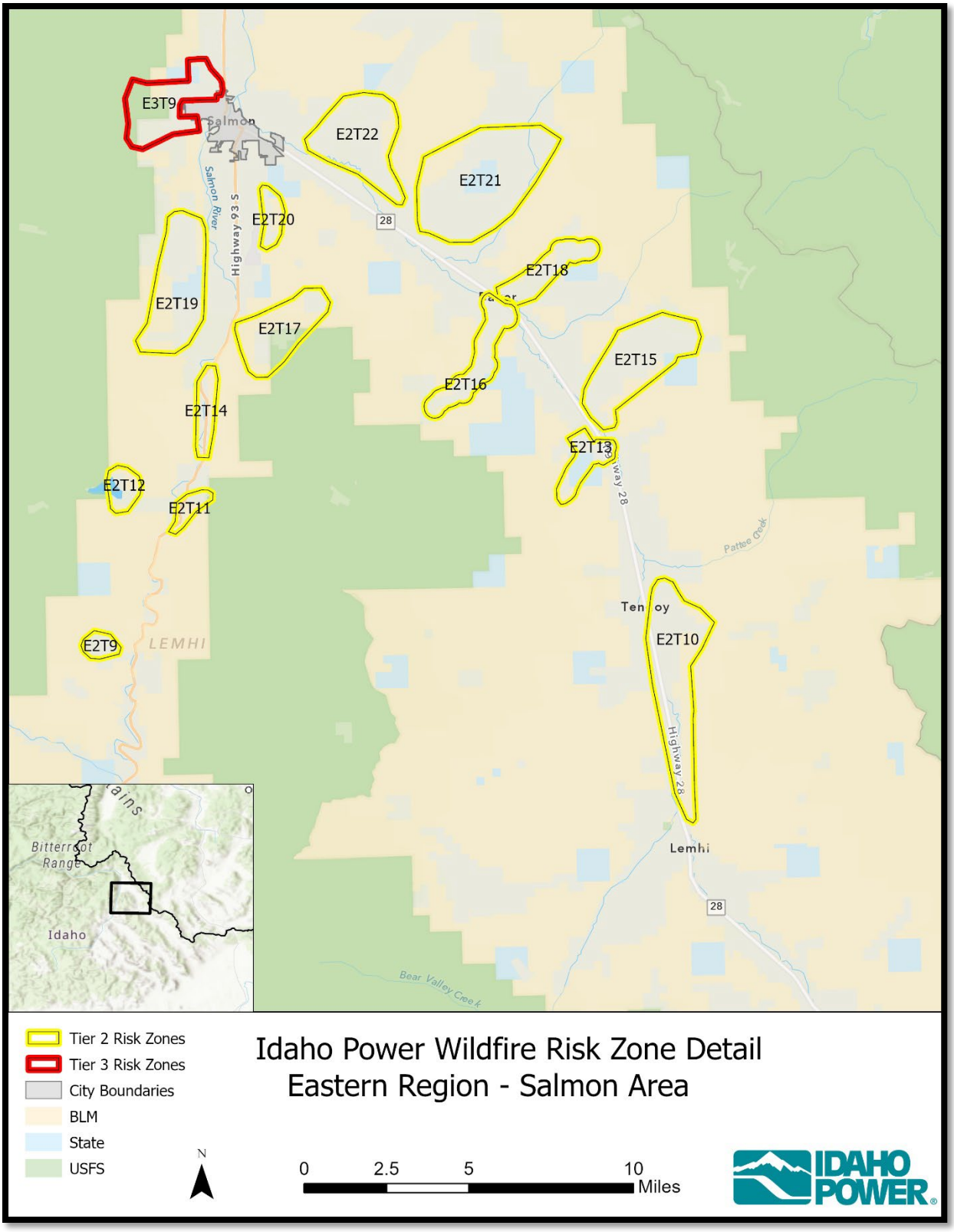


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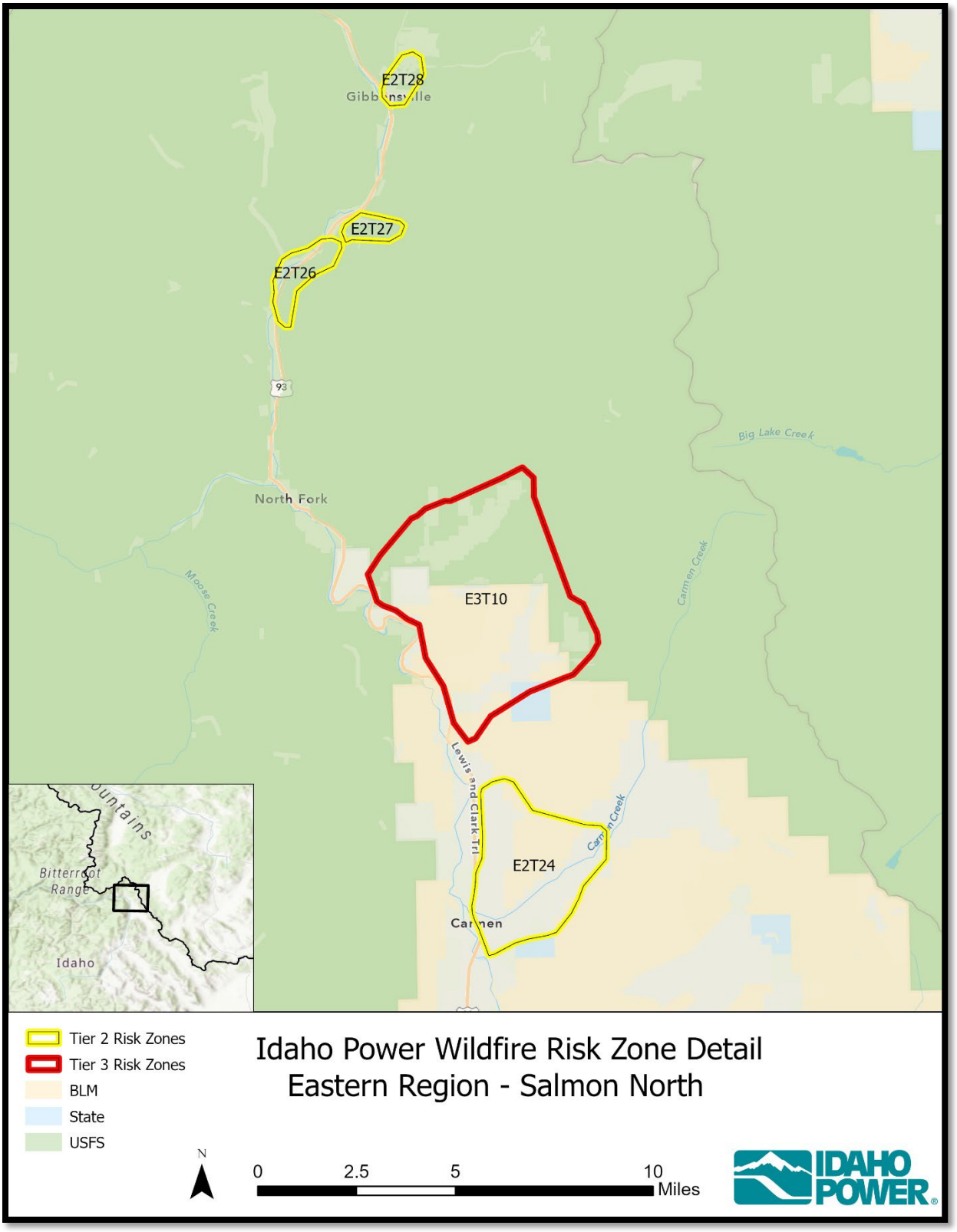


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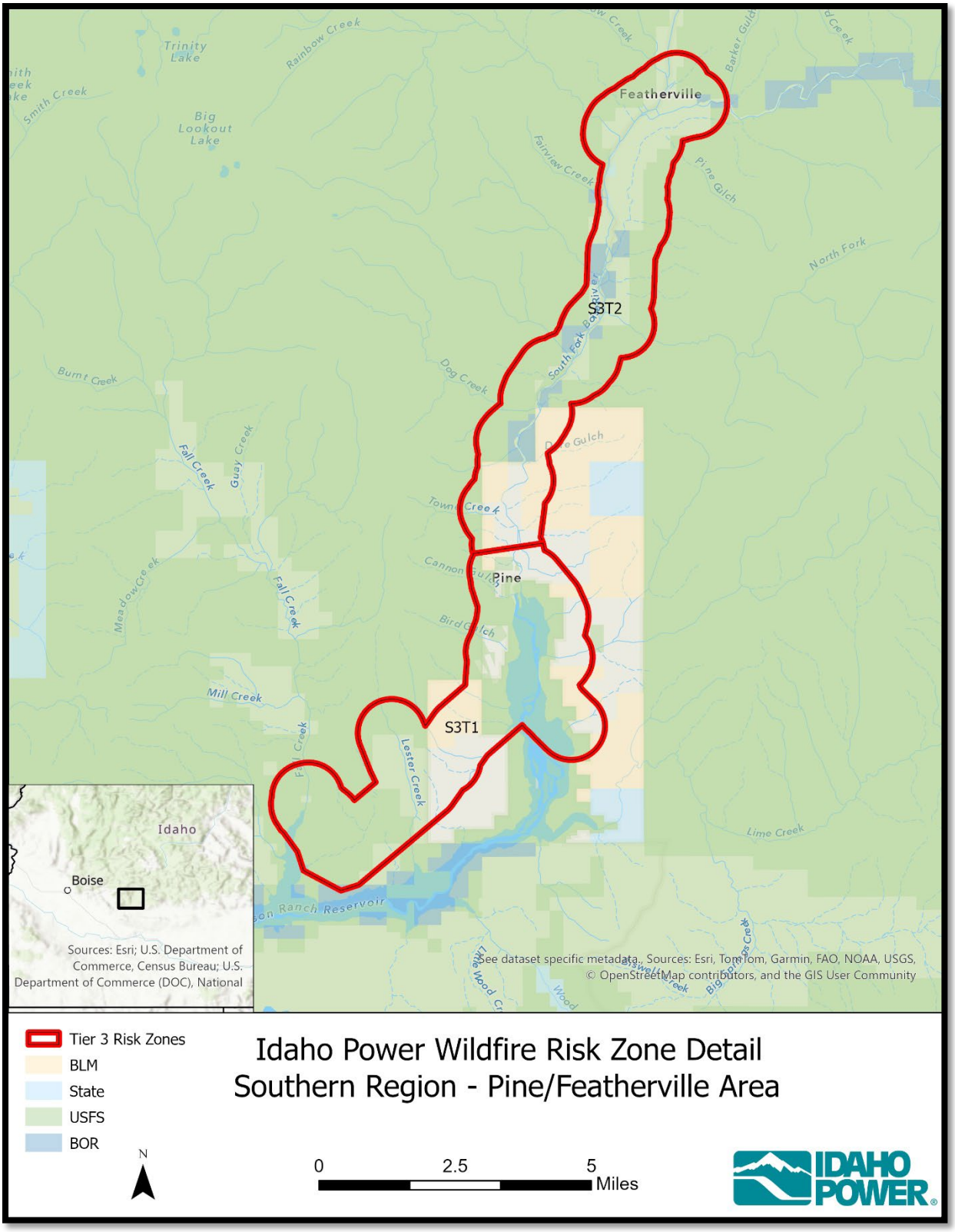


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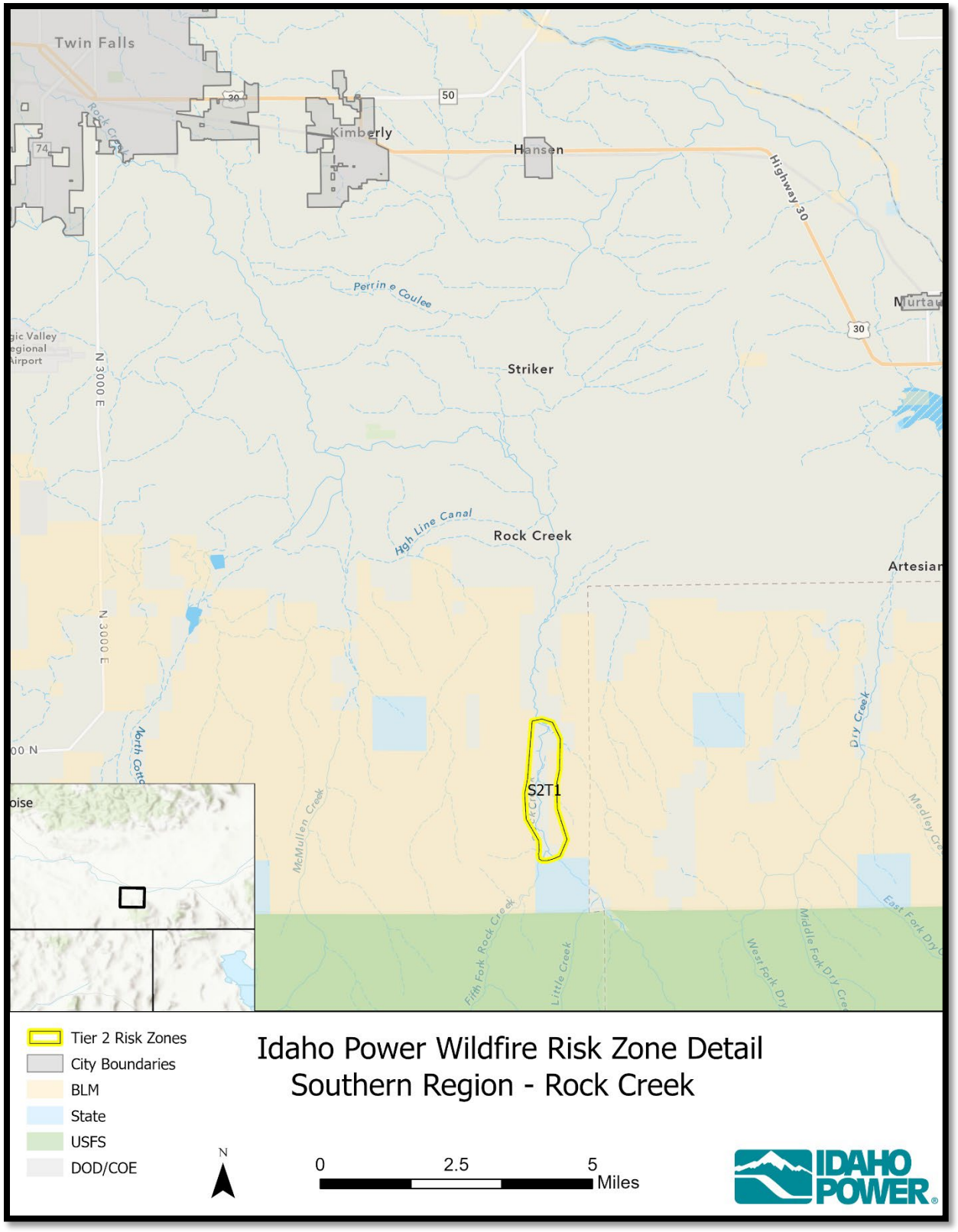


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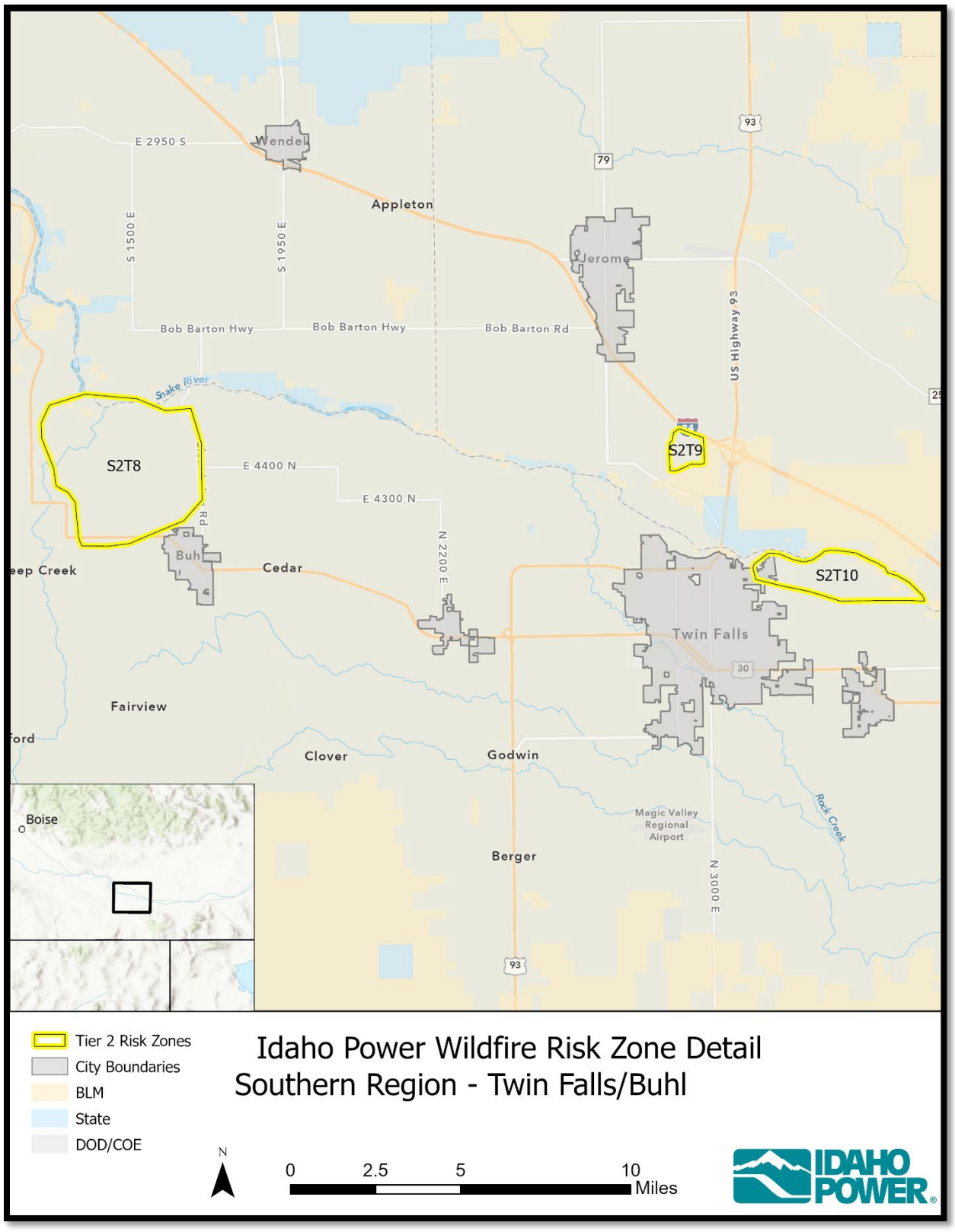


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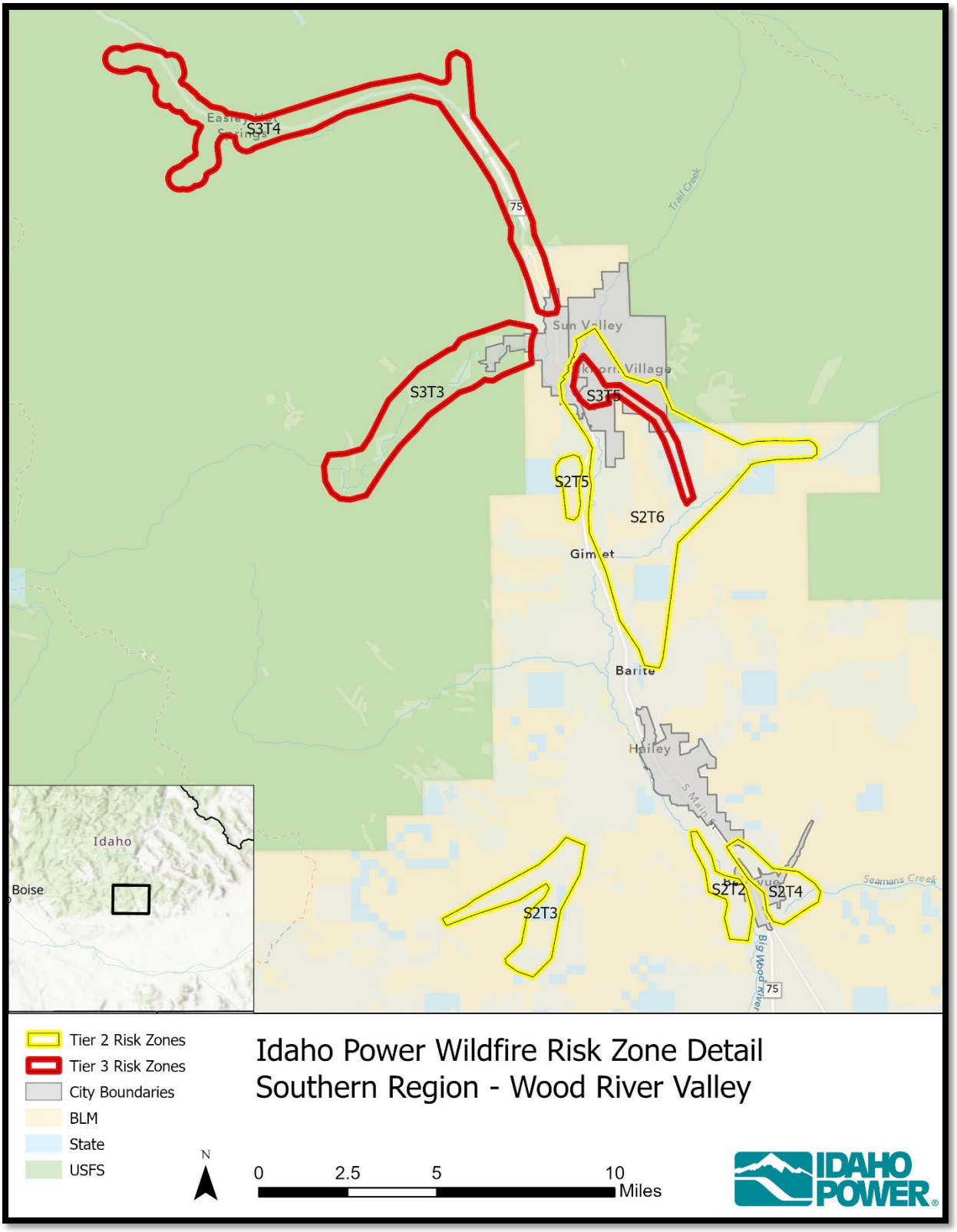


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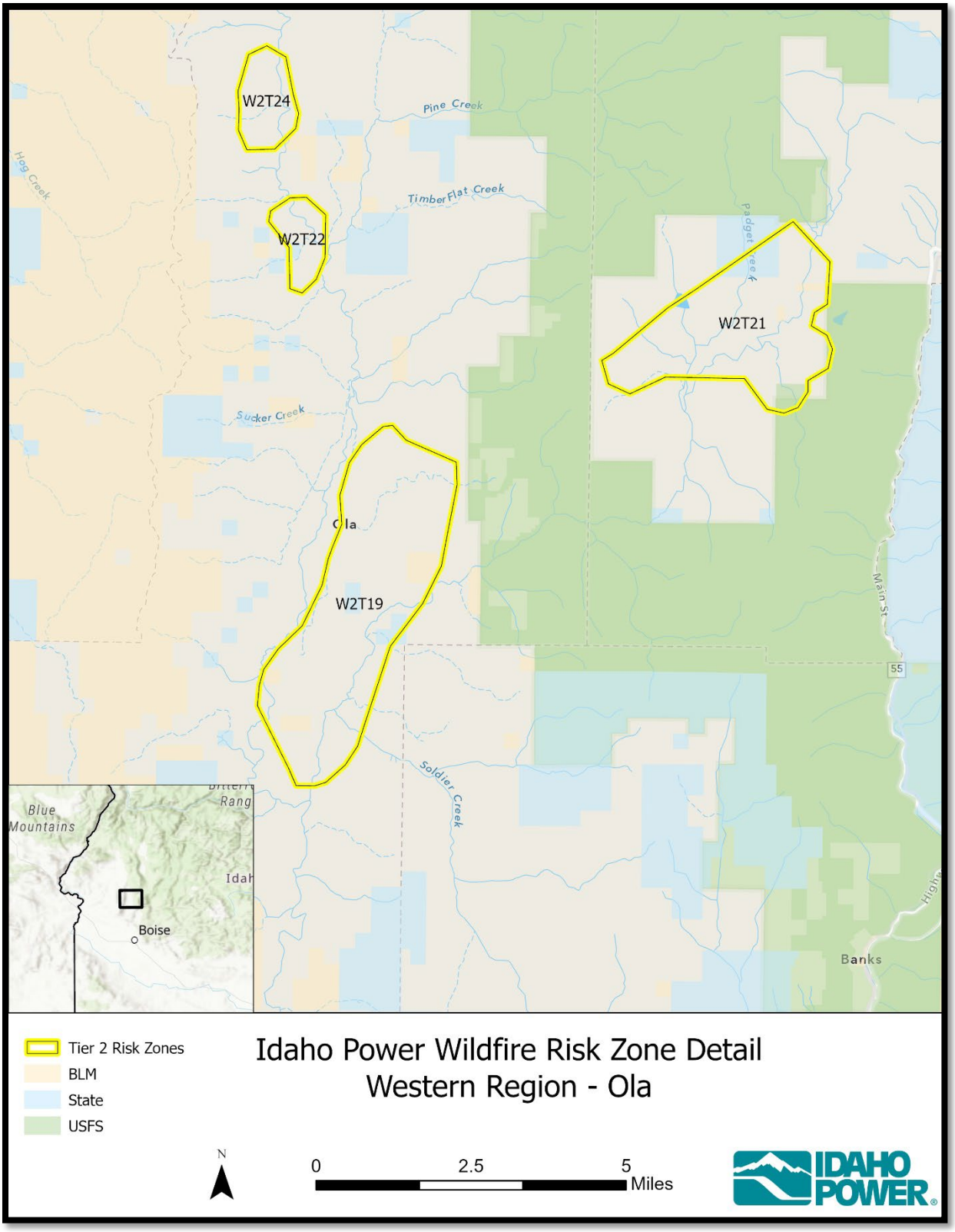


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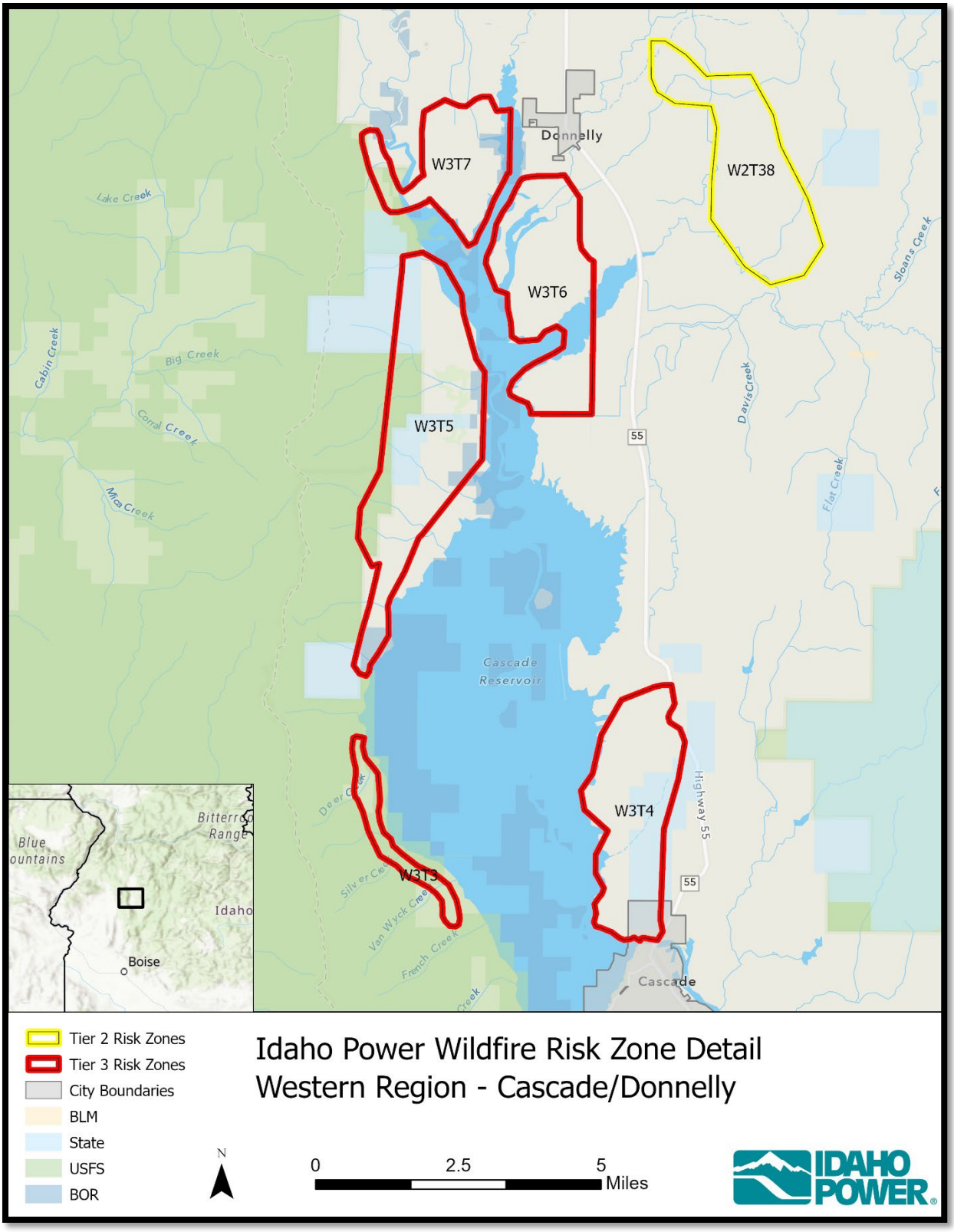


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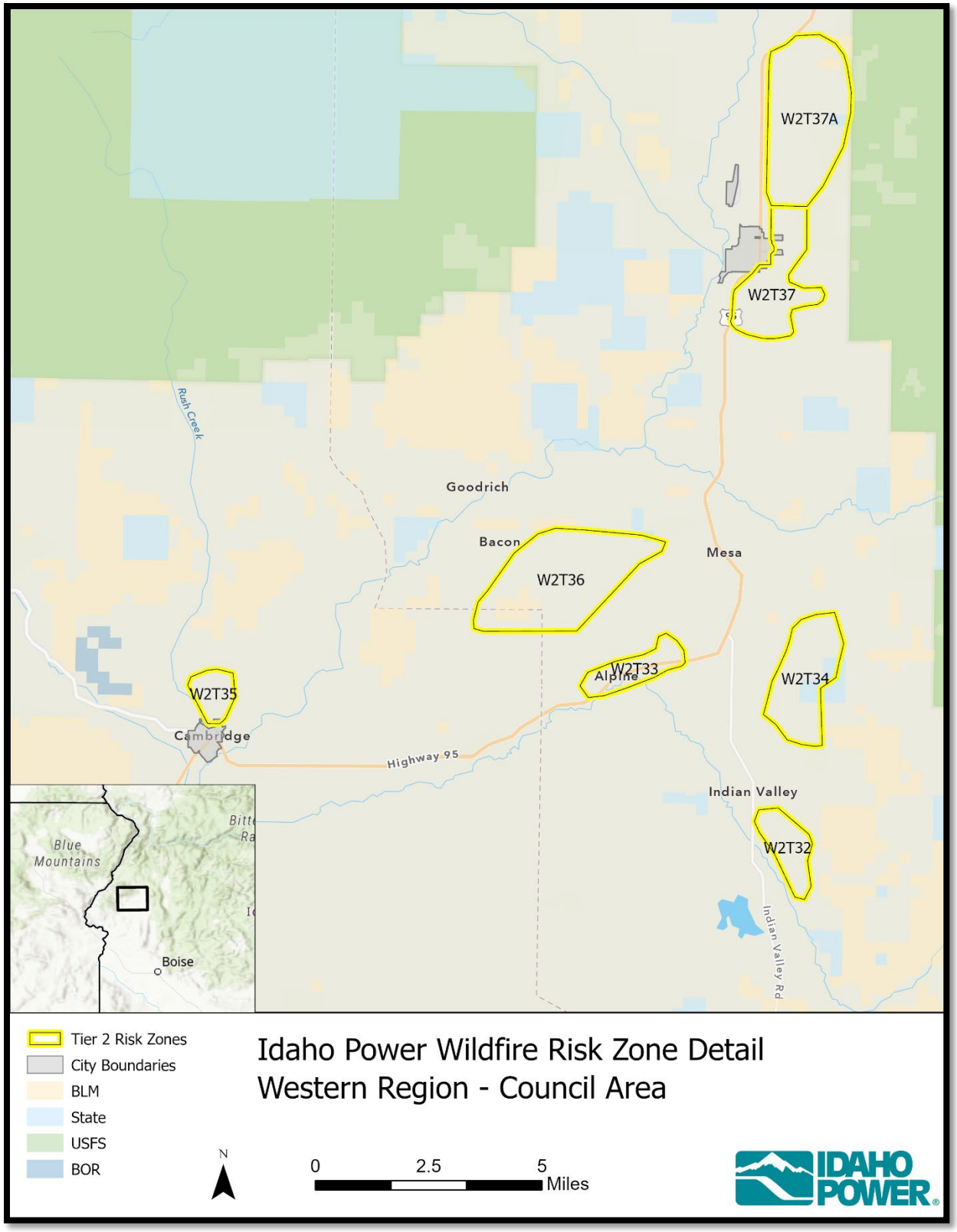


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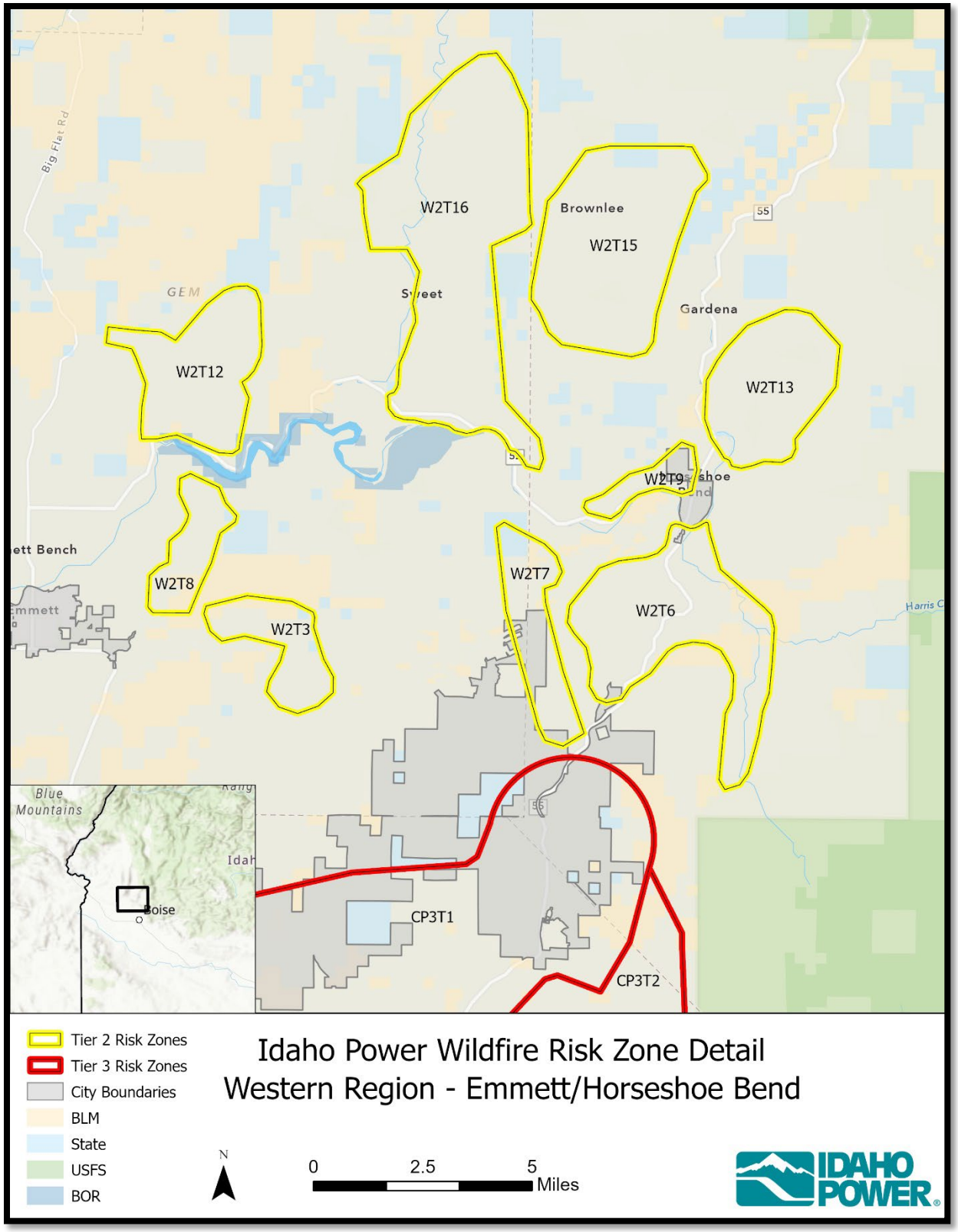


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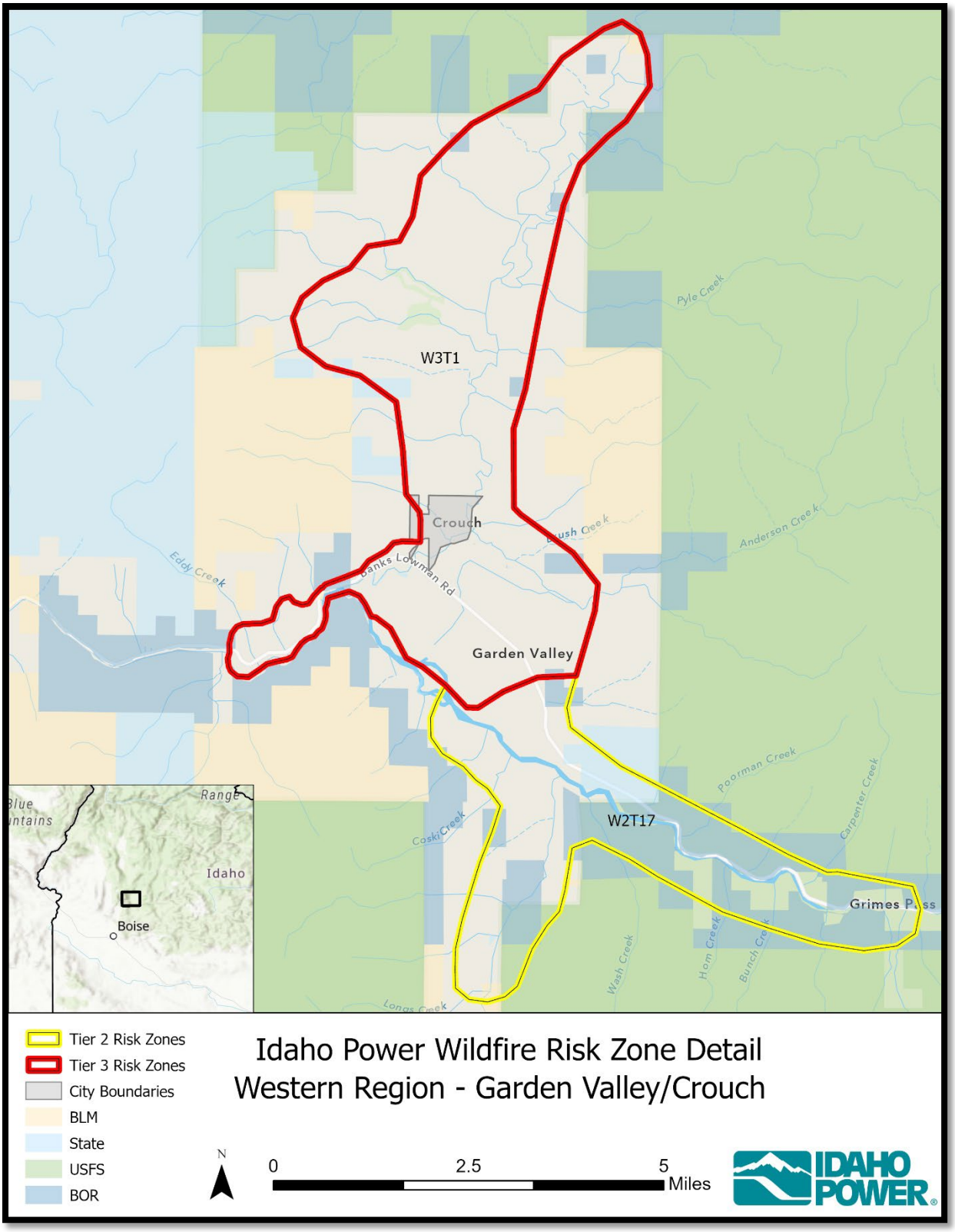


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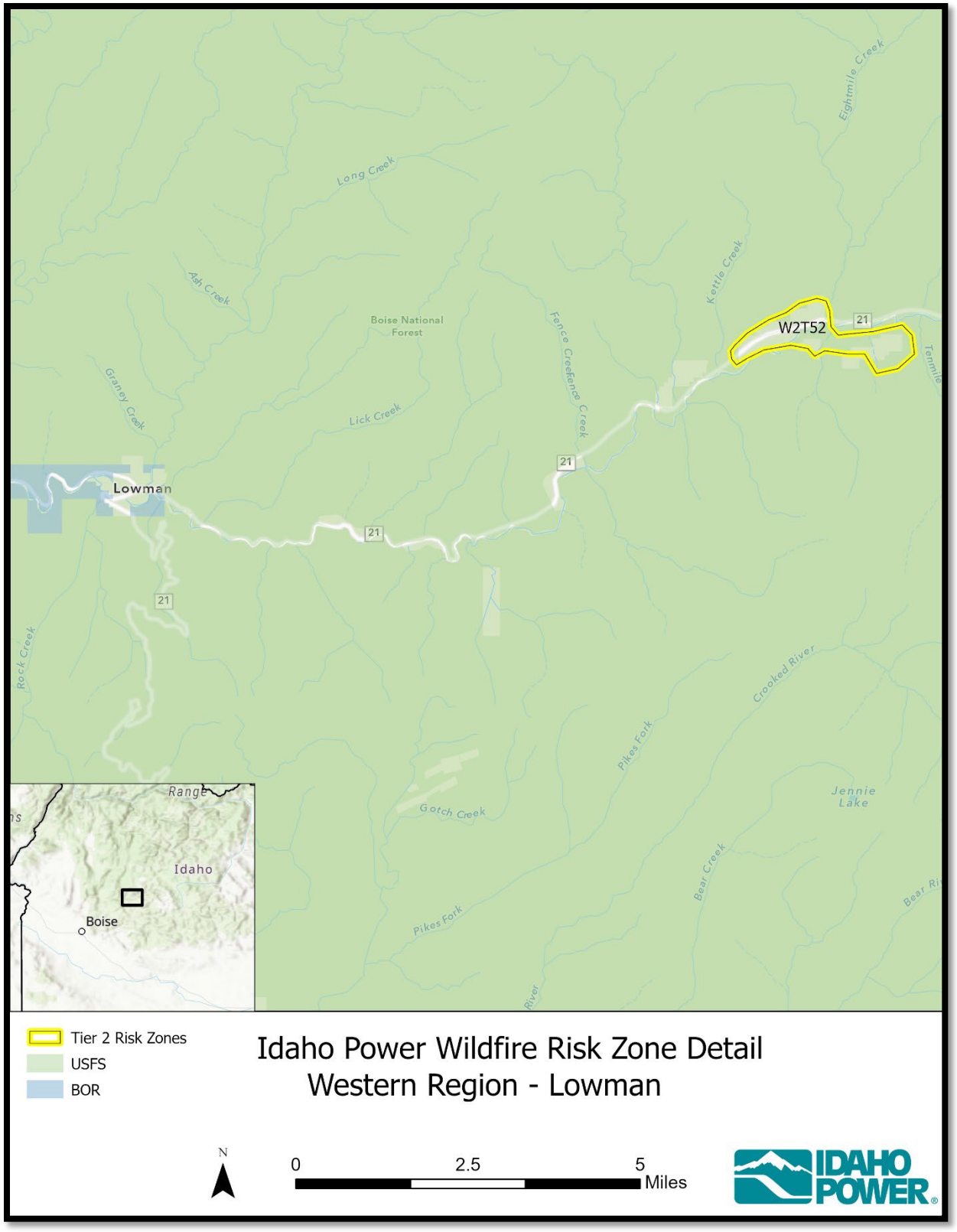


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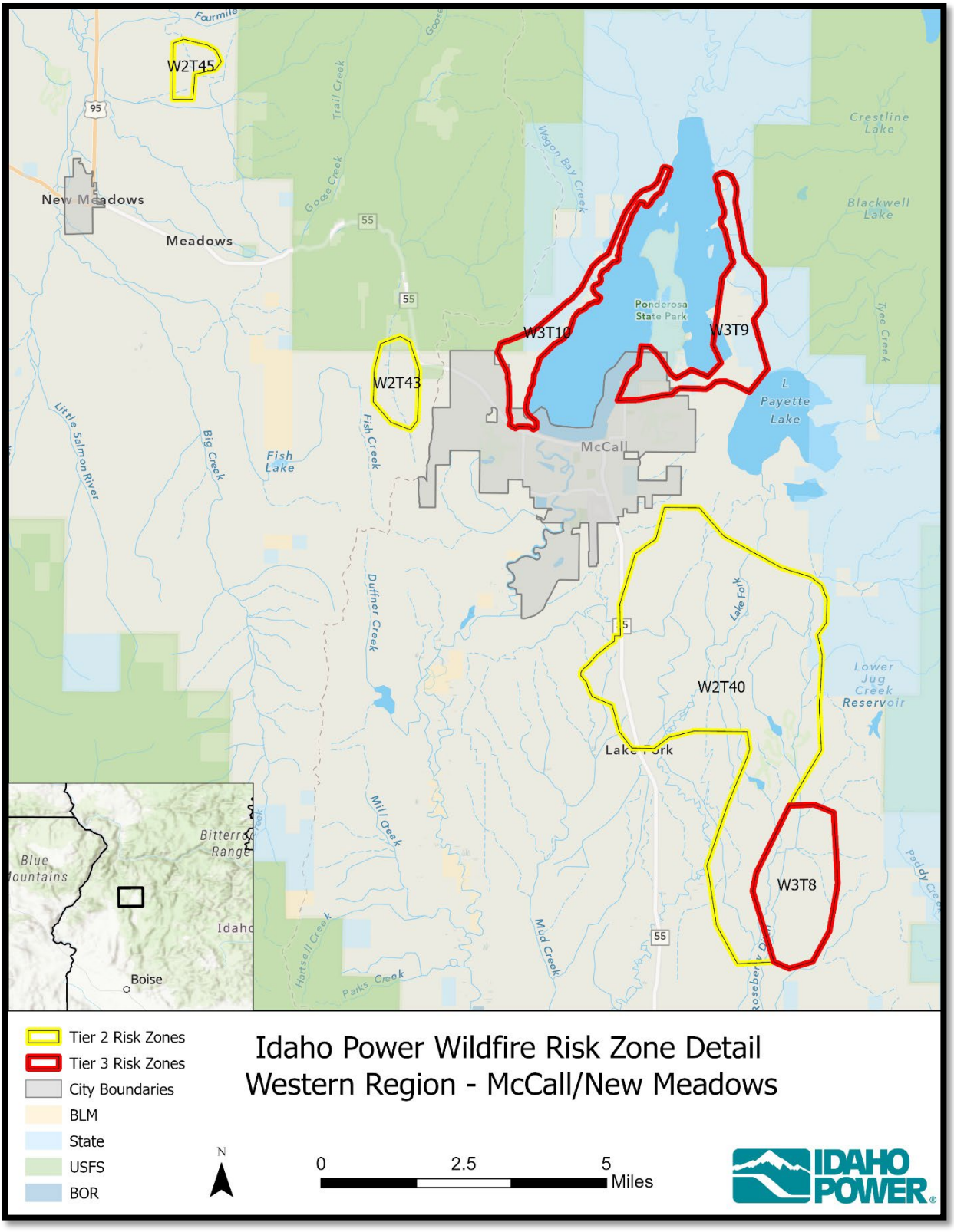


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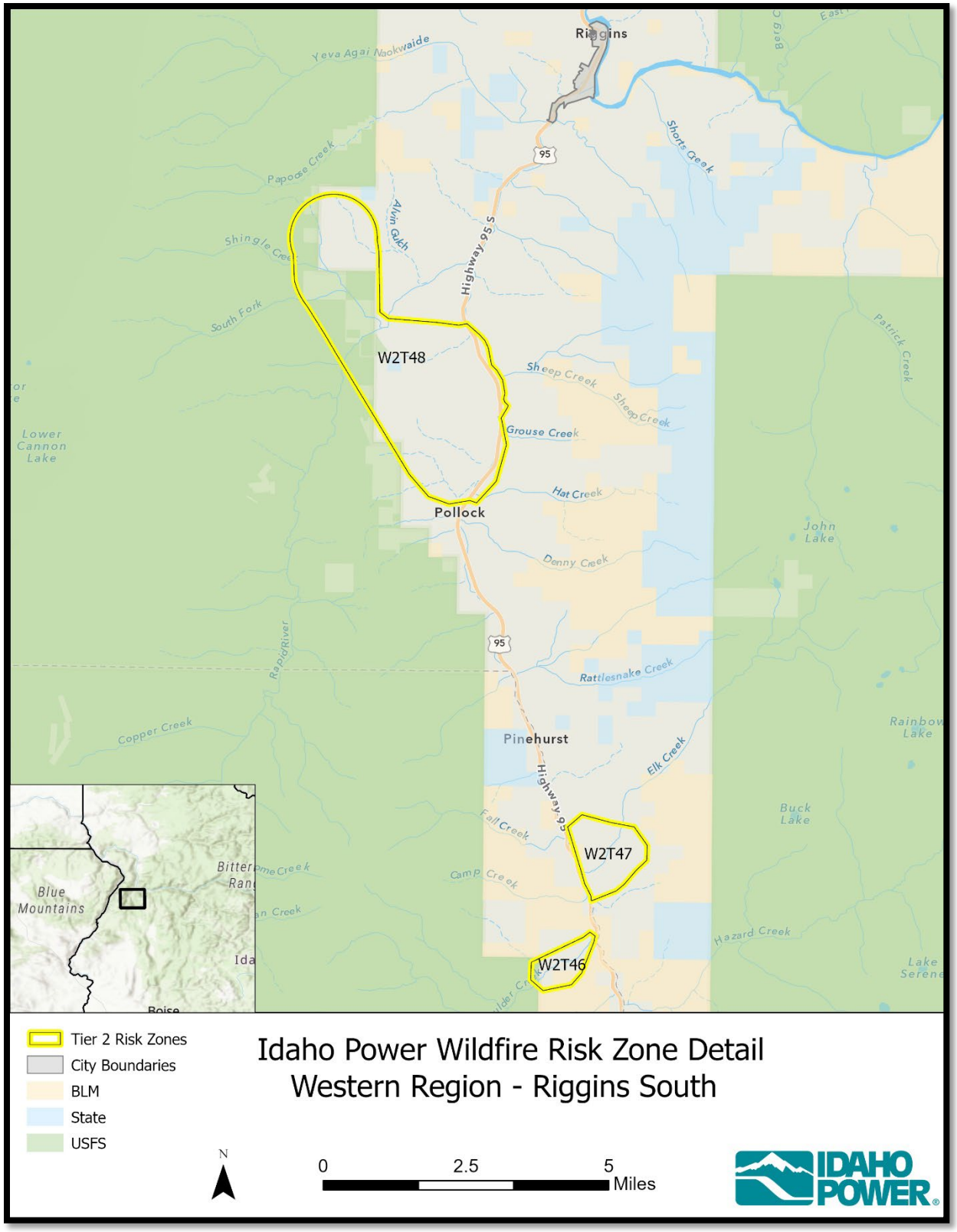


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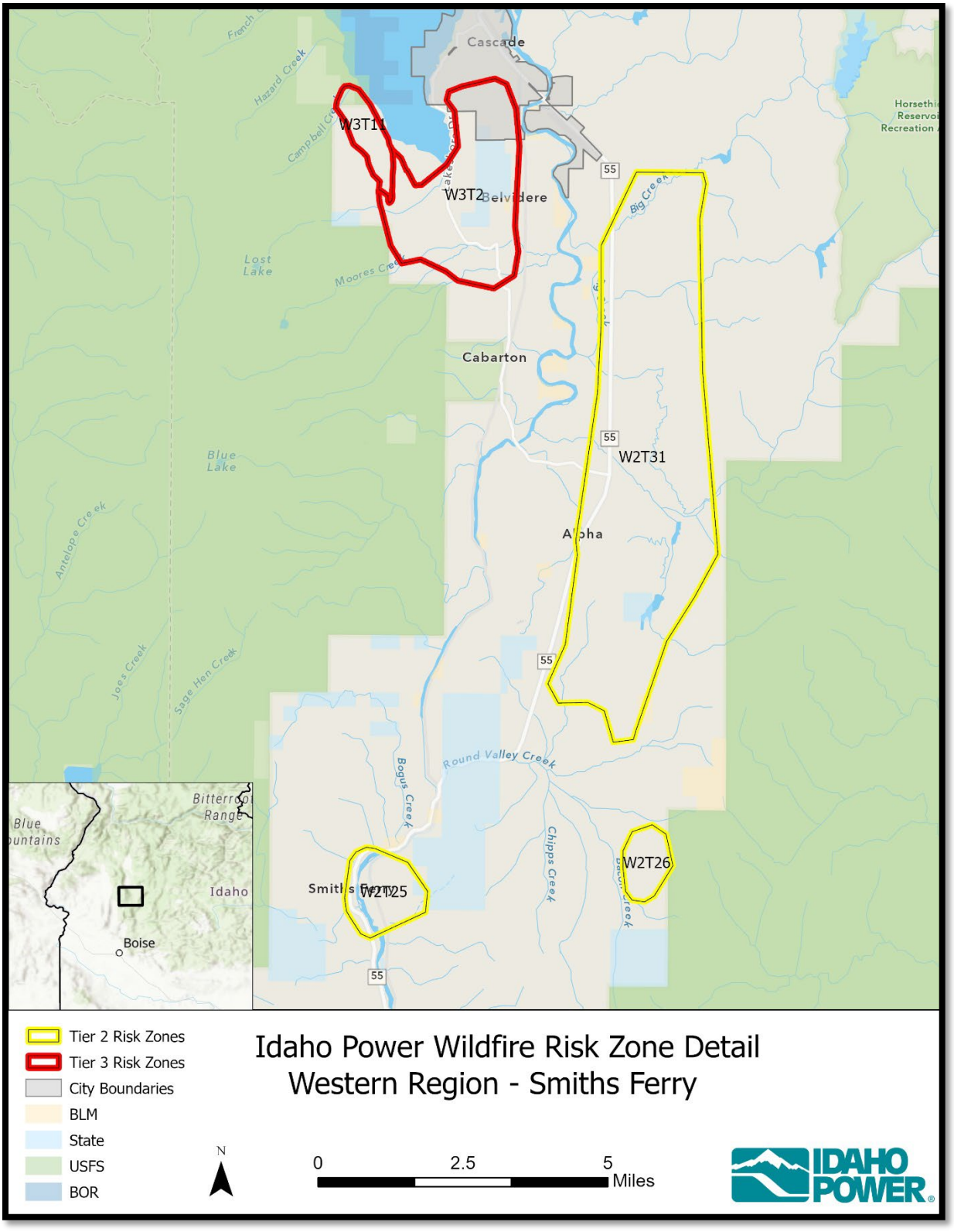


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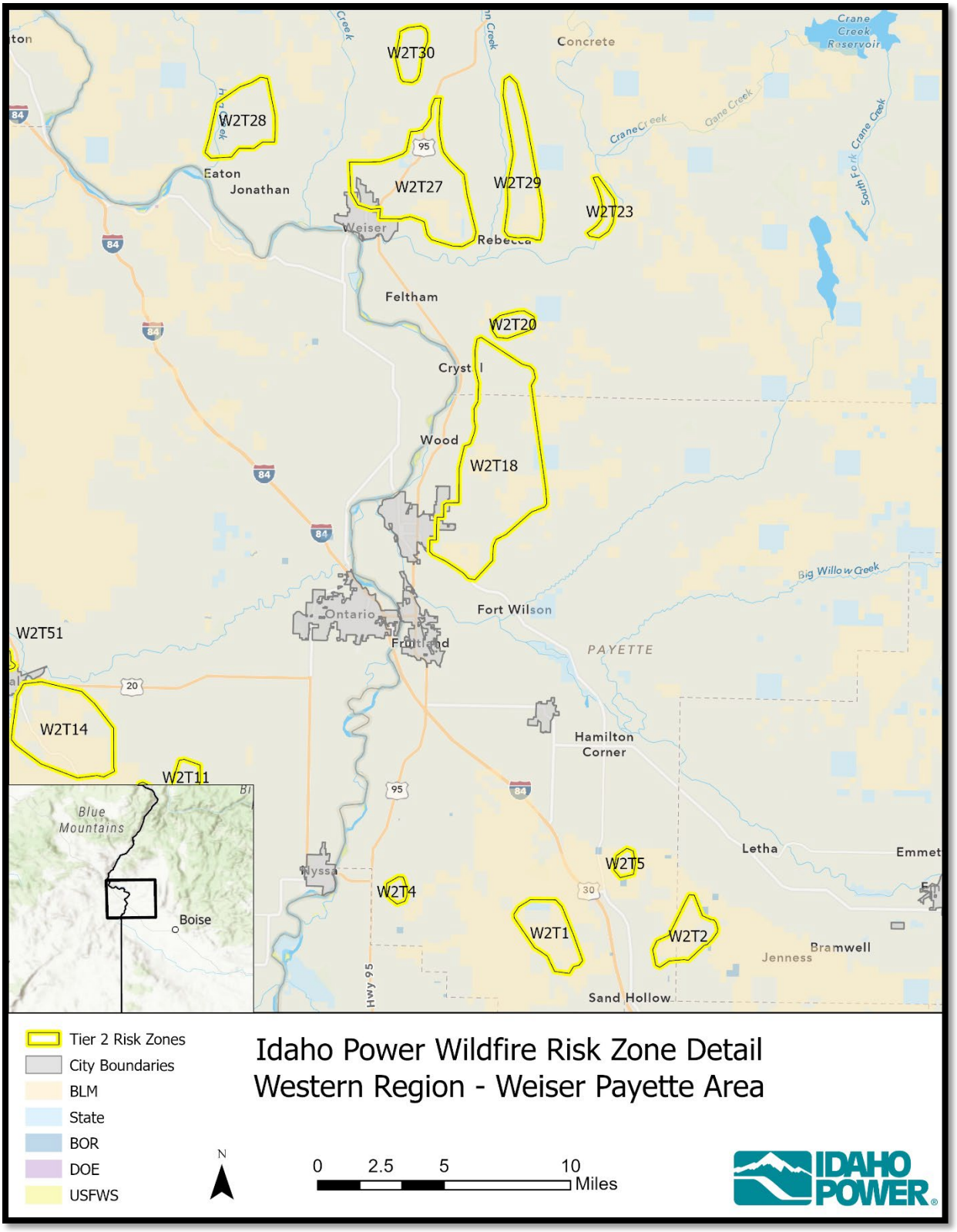


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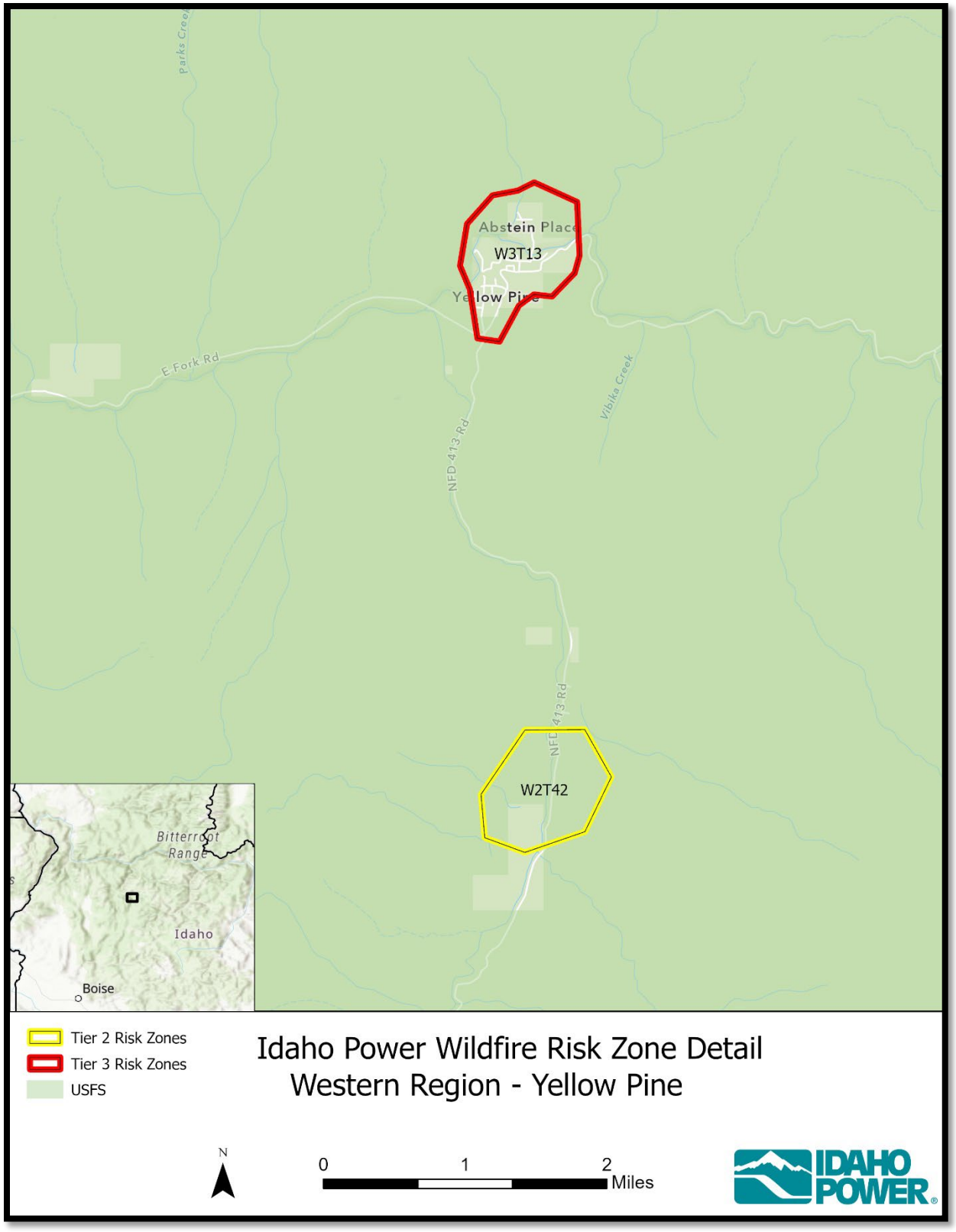


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Risk Zone Changes Highlighted

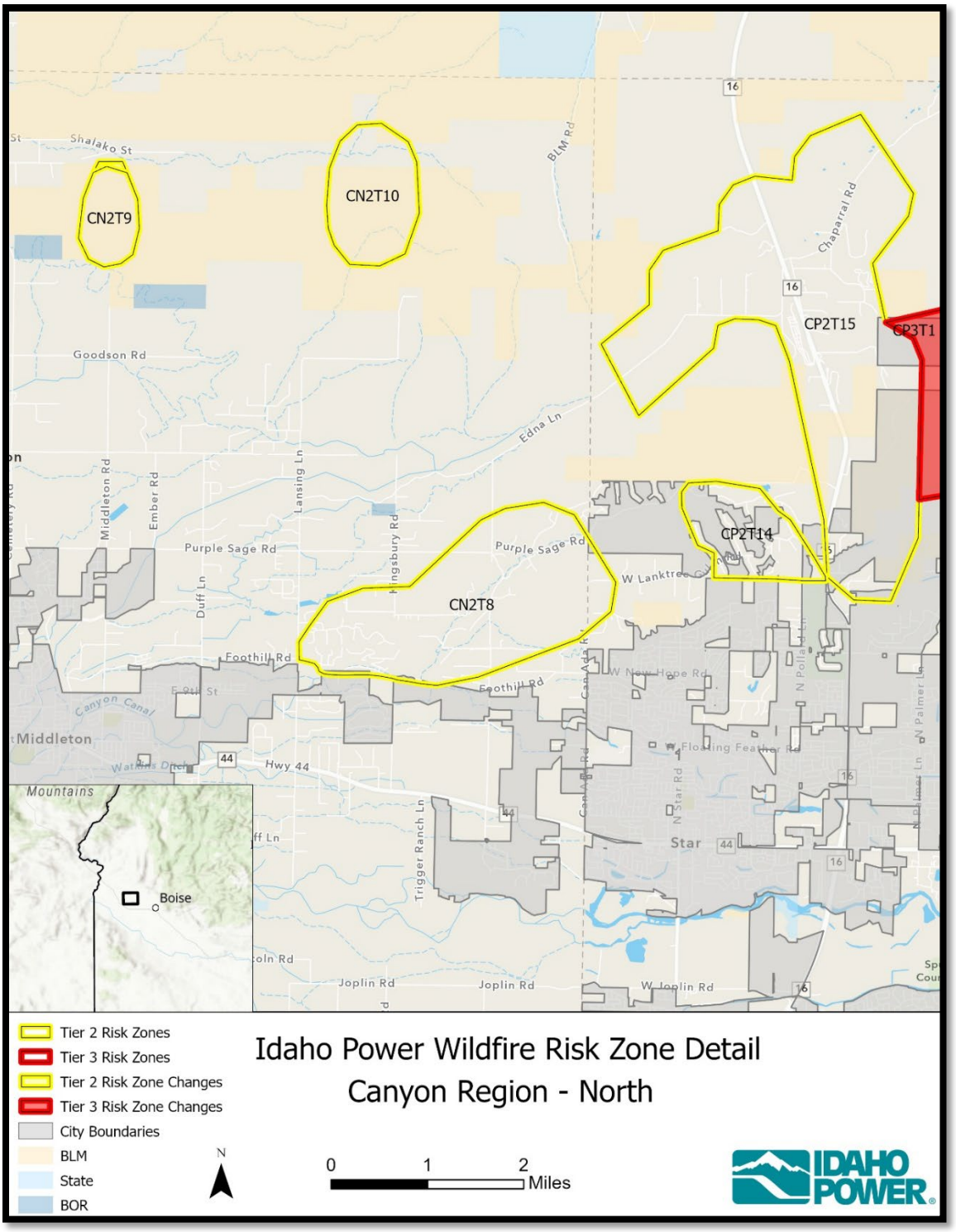


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Changes Highlighted: Canyon Region—North

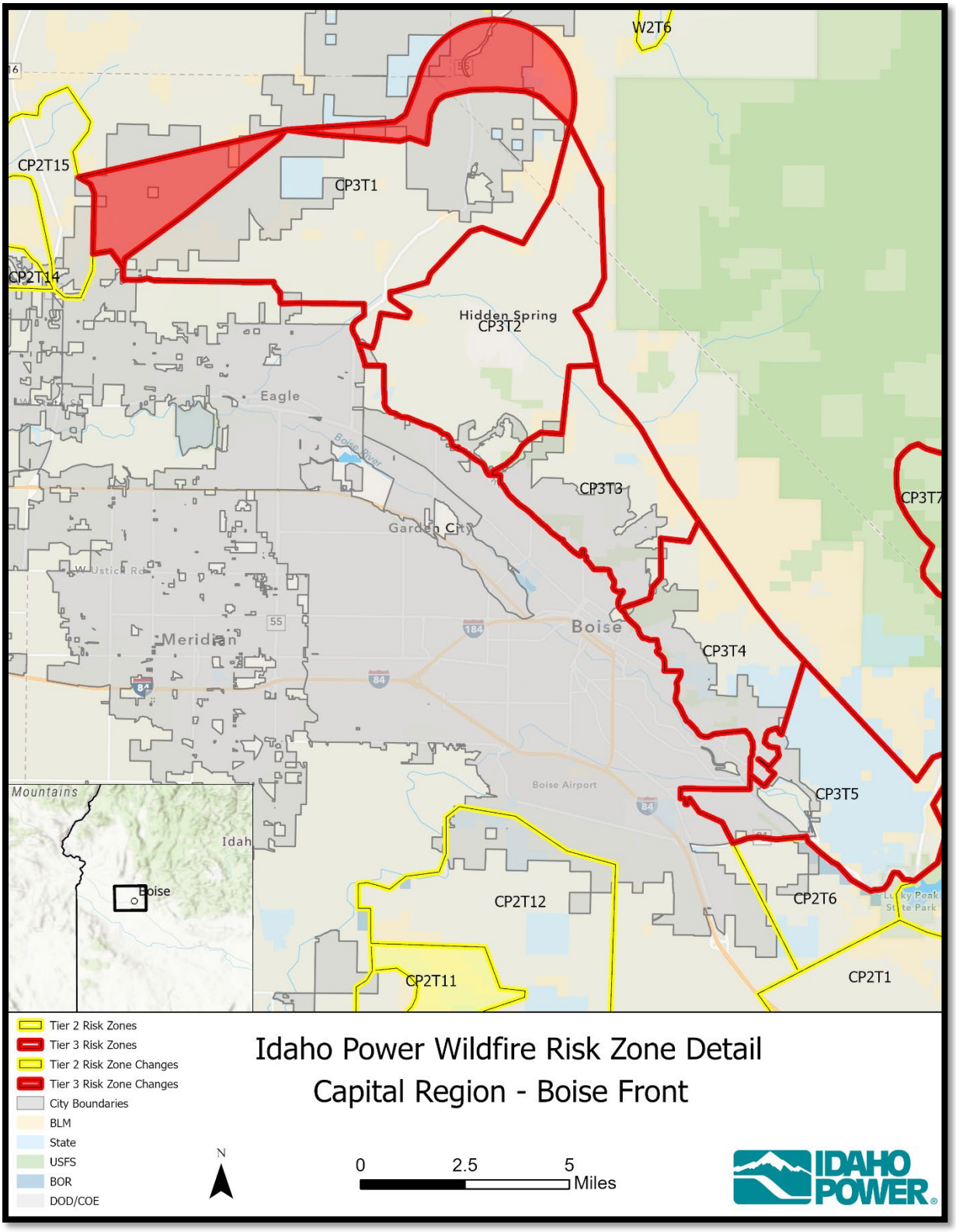


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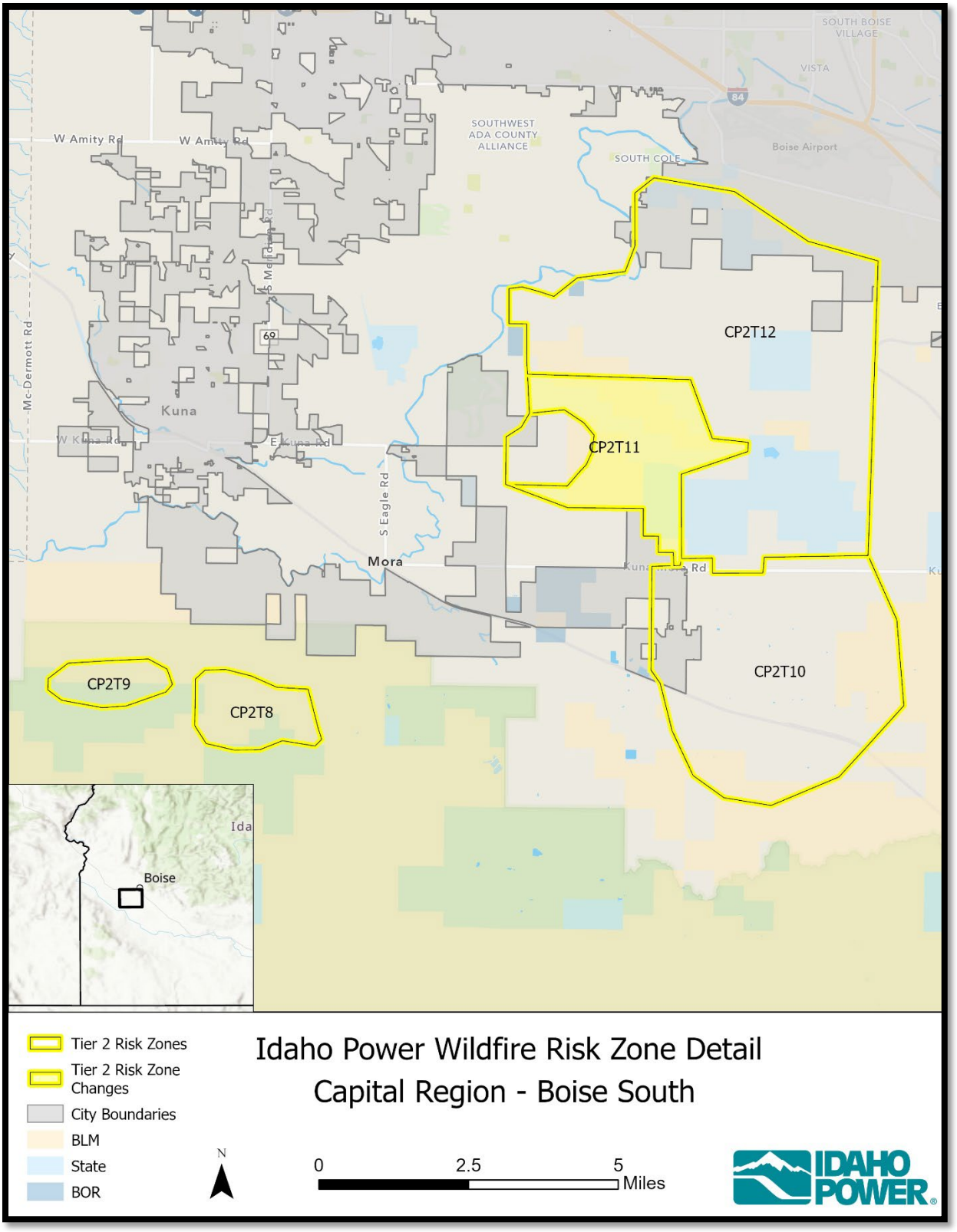


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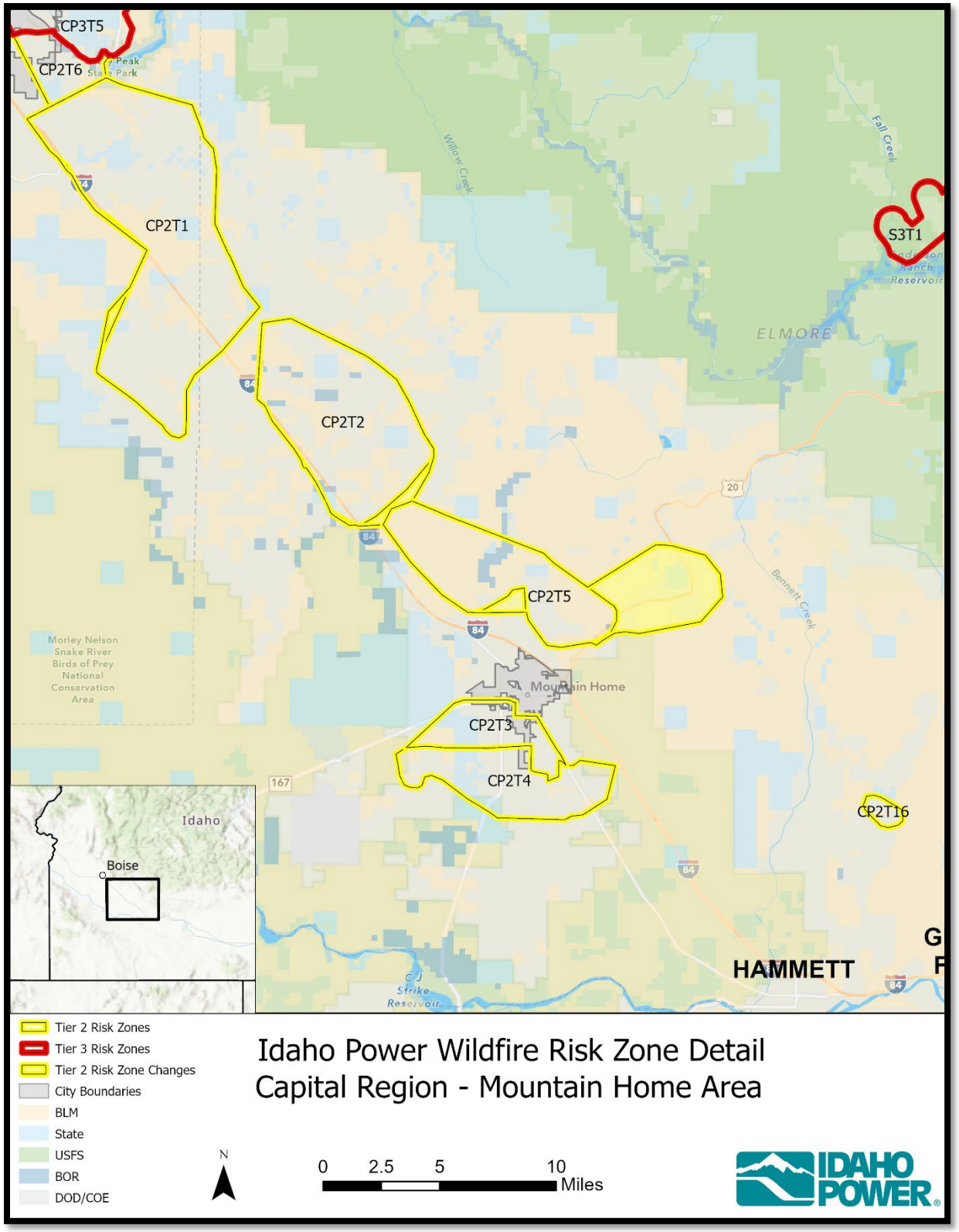


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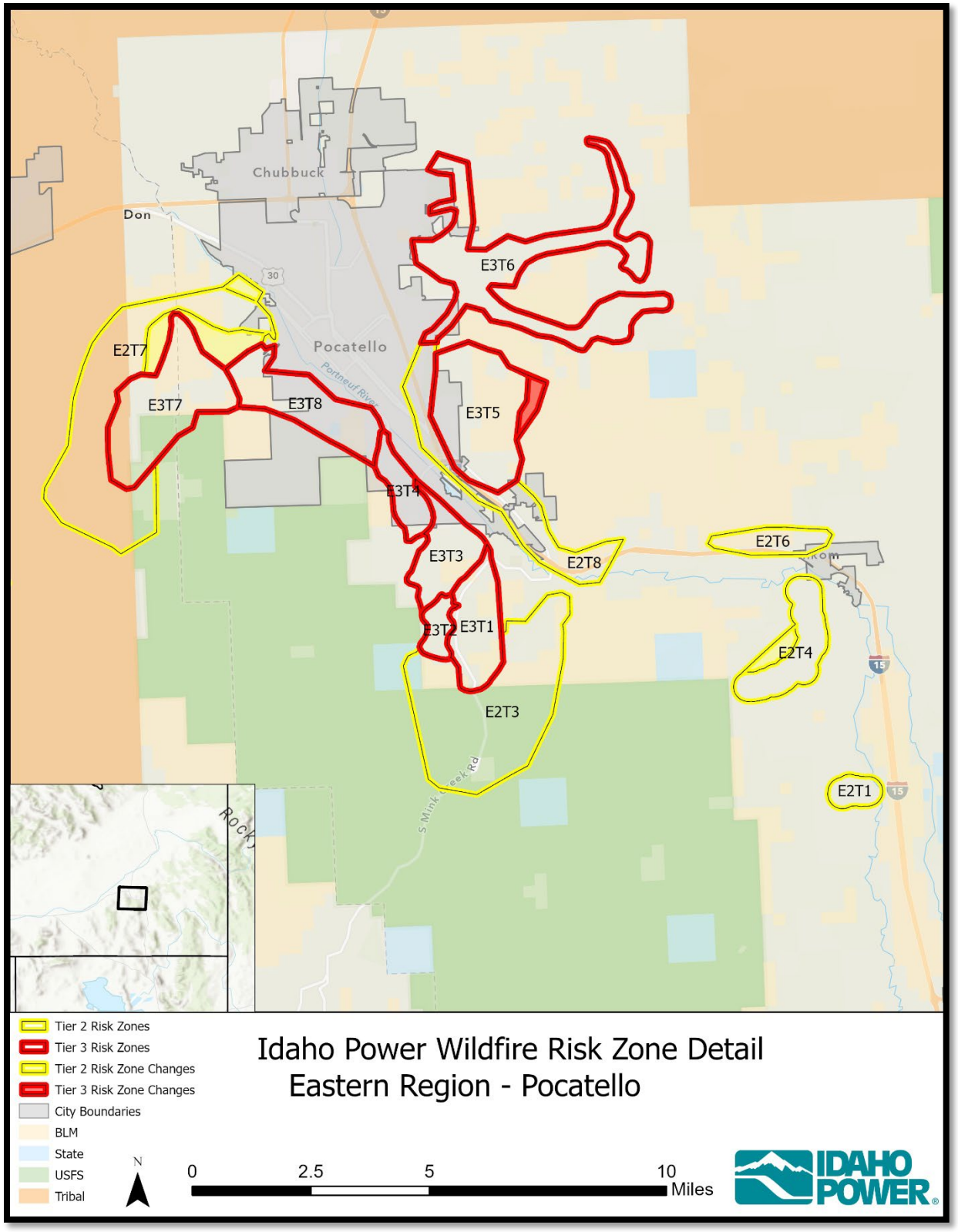


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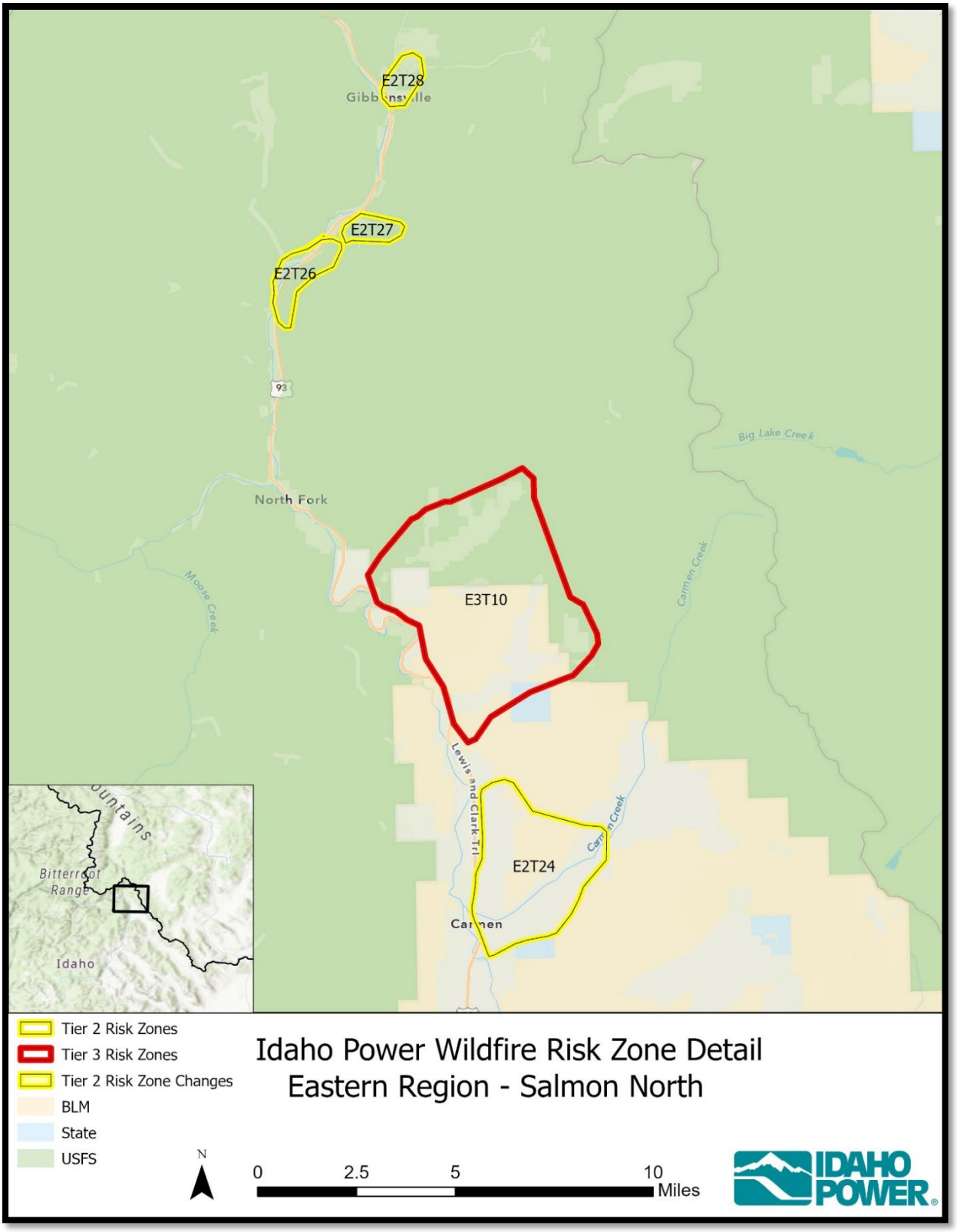


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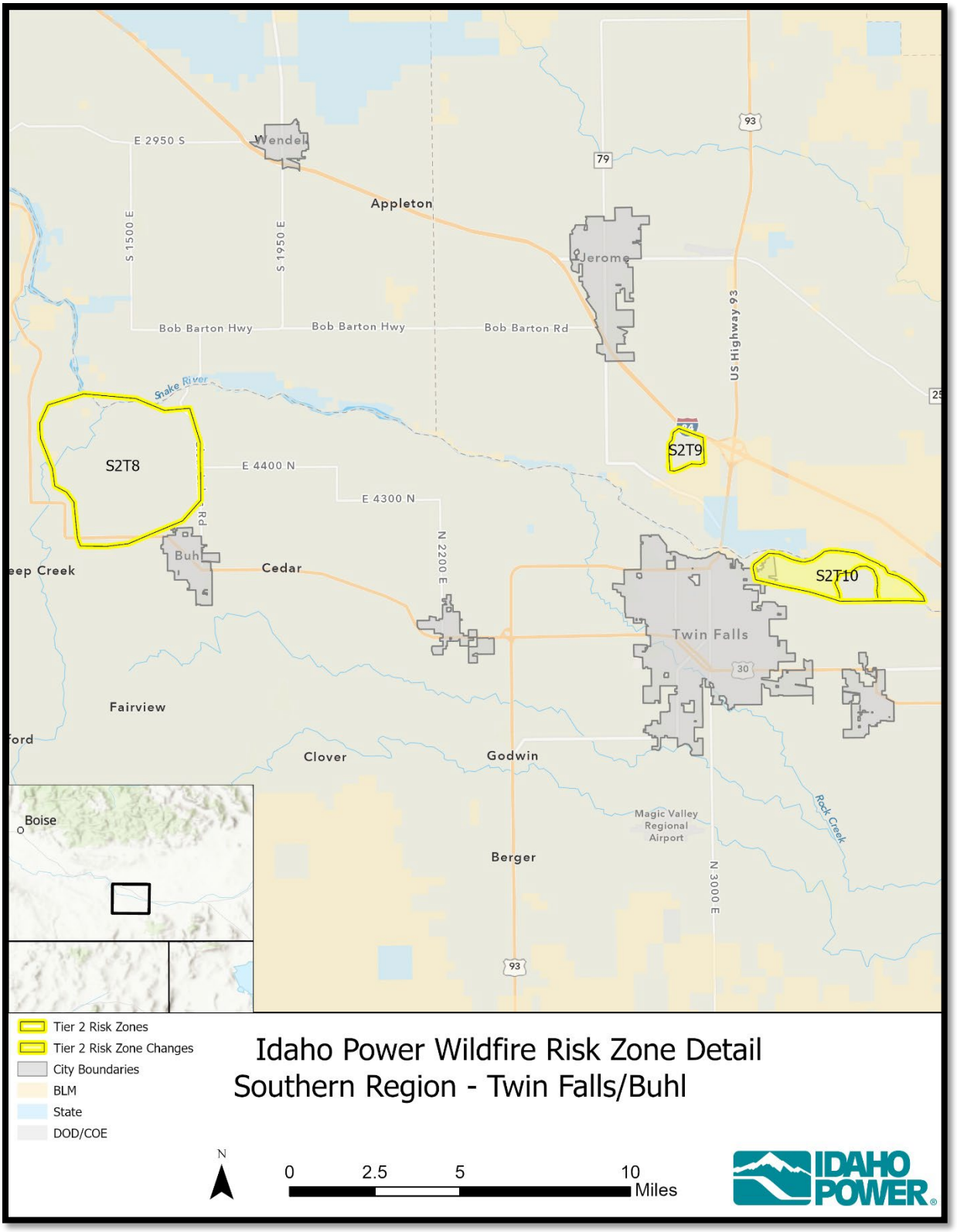


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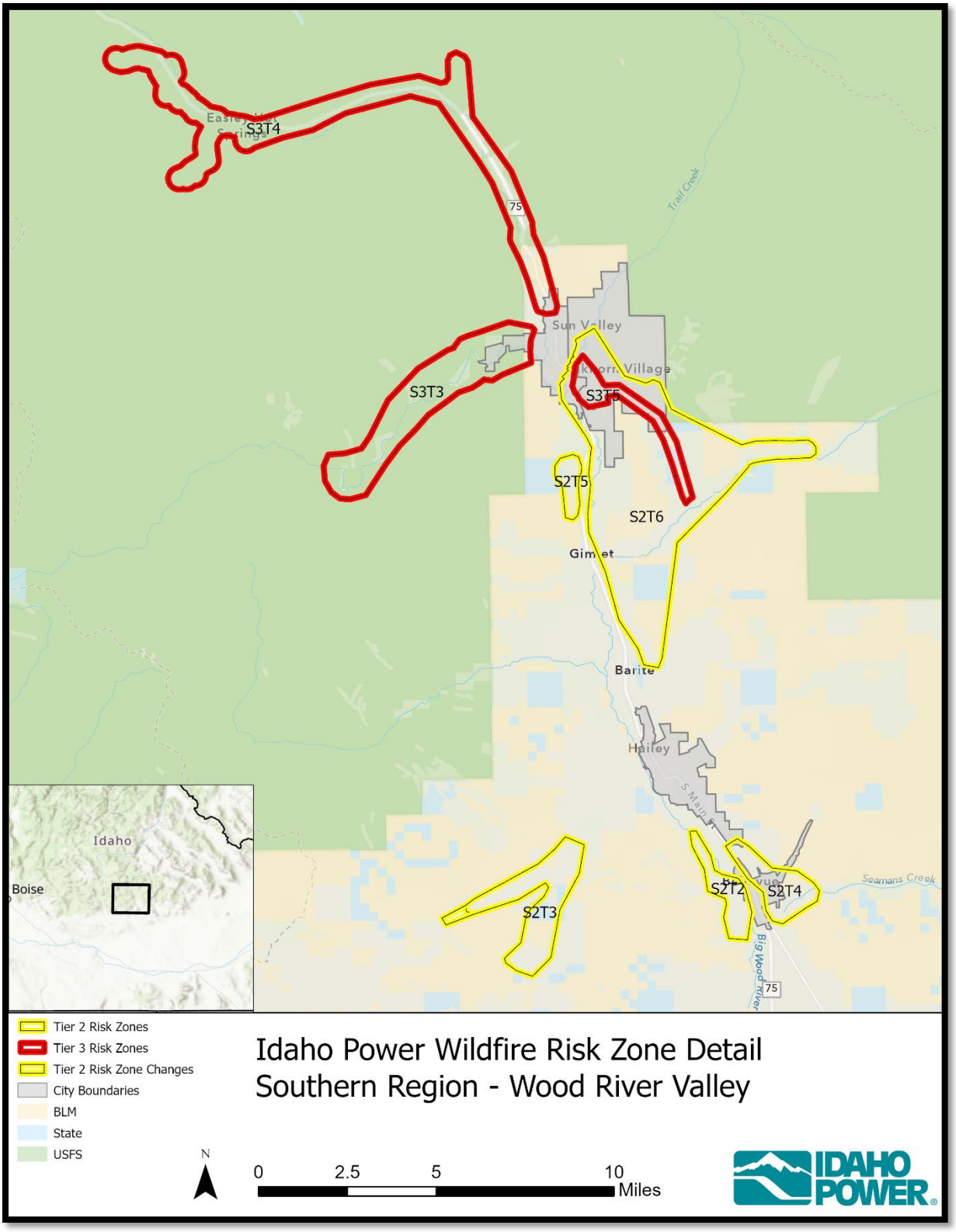


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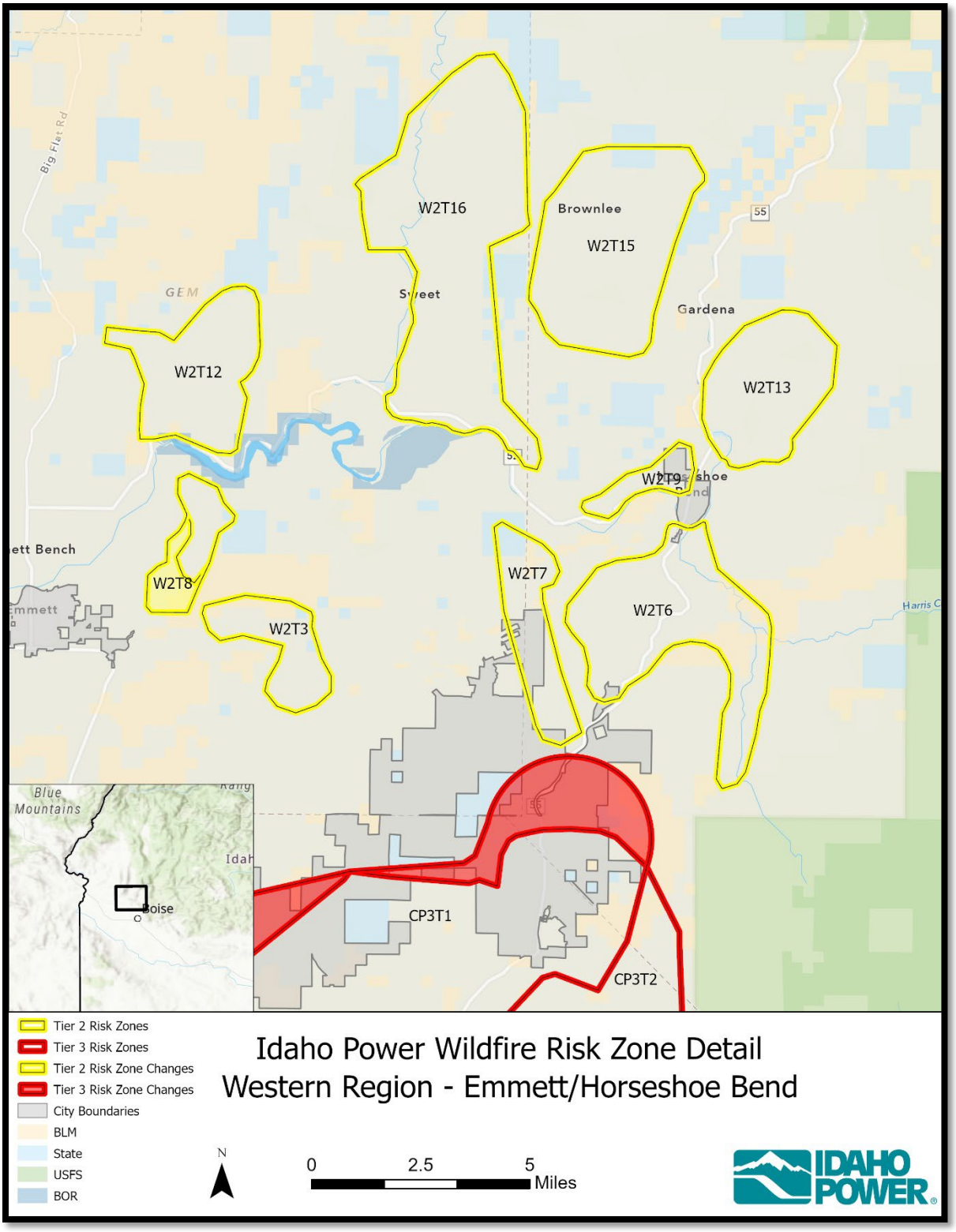


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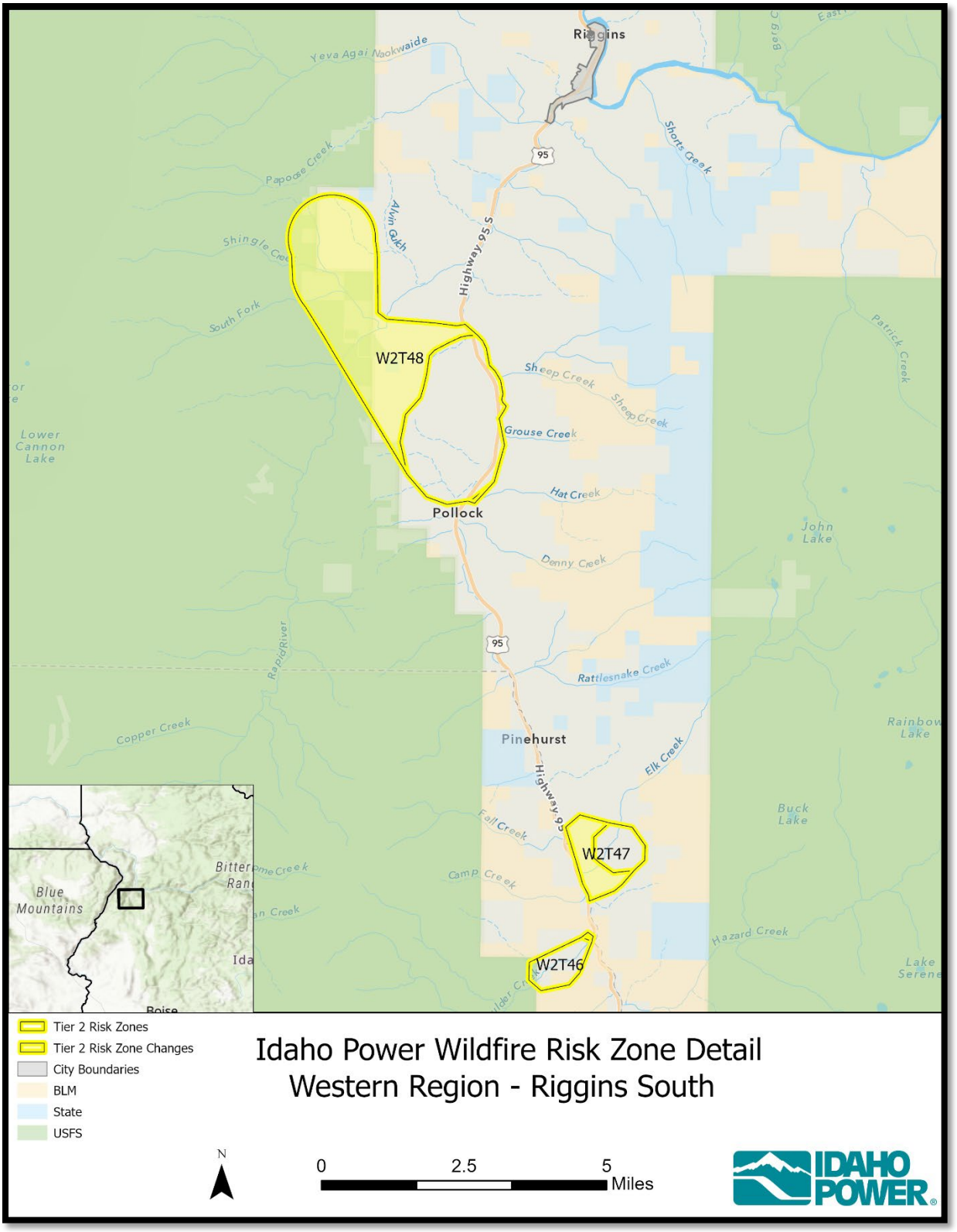


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Appendix D
Idaho and Montana Requirements and Recommendations Crosswalk

Appendix D. Idaho and Montana Requirements and Recommendations

October 2026

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Idaho and Montana Wildfire Requirements and Recommendations

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* 2027 *Wildfire Mitigation Plan* (WMP). This appendix first discusses Idaho requirements and recommendations and then addresses Montana requirements and recommendations. Appendix D is provided for ease of reference and is non-exhaustive. The WMP is a complex document, and content pertaining to a particular requirement or recommendation may be located in sections or appendices that are not specifically identified or cross-referenced 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 or Commission).

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 by the IPUC through Order No. 36774 issued 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
(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.	WMPs must include a cost-benefit analysis that justifies the expenditures for risk mitigation described within.	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: Wildfire Public Safety Power Shutoff Plan* *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029*

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
		Appendix G: Grid Hardening List
(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.	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 *Appendix C: Wildfire Risk Zone Map Book*
(3)(b) Preventative actions and programs that the electric corporation will carry out to reduce the risk of wildfire.	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, Staff recommends that previous areas of focus of each utility's WMPs continue to be included. A WMP's preventative actions and programs must include, but is 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	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 *Appendix A: Wildland Fire Preparedness and Prevention Plan* *Appendix B: Wildfire Public Safety Power Shutoff Plan* *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029* *Appendix G: Grid Hardening List*

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
	May include public service announcements to create awareness and provide education of wildfire risks, providing preventative measures, etc. Consistent with 61-1803(3)(c) and 61-1803(3)(d). A WMP's preventative actions and programs may include, but is not limited to, the following: • <u>System Hardening Strategies</u> May include pole replacements, line rebuilding, or undergrounding if necessary, strategic fuse or reclosers installations, etc. • <u>Workforce Preparedness</u> May include workforce training, equipment provided to employees to reduce the risk of wildfire, etc. • <u>Pilot Programs</u> If applicable.	
(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.	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 *Appendix B: Wildfire Public Safety Power Shutoff Plan*
(3)(d) Outreach efforts to coordinate with federal, state, tribal, and local officials and	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:	Section 4.6 Wildfire Detection Cameras

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
agencies on wildfire preparedness and emergency response plans.	• If applicable, Public Safety Power Shutoff (PSPS) tabletop exercises with interested parties and agencies. • 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 10.3.2 Wildfire Resilience Partnerships and Fuels Reduction Shared Stewardship (Pilot) Section 11. Public Outreach and Engagement Section 12. Government, Industry, and Peer Utility Outreach
(3)(e) Financially prudent and reasonably practicable methods of line design for new, planned, and existing lines to mitigate fire risk.	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 *Appendix F. Wildfire Mitigation Activities and Cost Forecast 2027–2029* *Appendix G: Grid Hardening List*
(3)(f) Monitoring of forecasted and current weather data for the purpose of assessing and responding to current and anticipated fire risk.	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 *Appendix A: Wildland Fire Preparedness and Prevention Plan* *Appendix B: Wildfire Public Safety Power Shutoff Plan*

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
(3)(g) Developing standards, procedures, and schedules, subject to timely approval of access to rights-of-way, if necessary, for the following actions: (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.	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 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 7. Infrastructure Inspection and Asset Management Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029*
3(g)(ii) De-energization of the electric corporation's power lines, if considered appropriate by the electric corporation;	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 11. Public Outreach and Engagement Section 14. WMP Cost Summary *Appendix B: Wildfire Public Safety Power Shutoff Plan*
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	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.	Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs

Idaho Requirement—WSCA 61-1803	WMP Guidelines—IPUC Order No. 36774, Exhibit B	Corresponding Location in WMP
or lands adjacent thereto and that threaten the power lines or other electric corporation infrastructure. If live marketable timber is 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.	Elements of this vegetation management section overview should include, but is not limited to, the following: • 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.	Section 12. Government, Industry, and Peer Utility Outreach Section 14. WMP Cost Summary *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029*

Other Items to Include in a WMP from Various IPUC Orders

IPUC Order No. 37004, Case No. IPC-E-25-32

The following contains the directives contained exclusively in IPUC Order No. 37004 that pertain to Idaho Power's development and submission of WMP filings, including specific content requirements.

Adopted Recommendation: Identify the types of infrastructure excluded from Idaho Power's risk modeling and, where such infrastructure is not incorporated into the company's models, provide an explanation for its exclusion.

An explanation of infrastructure excluded from Idaho Power's risk modeling is included in Section 2.2. Identifying Areas of Heightened Wildfire Risk.

Adopted Recommendation: Incorporate quantitative model validation and analysis into its geographic risk modeling and assessment.

A discussion on how the company has incorporated quantitative model validation and analysis into its geographic risk modeling and assessment is included in Section 2.2.2.2. Model Validation and Section 2.2.3. 2027 Wildfire Risk Zone Modification Process.

Adopted Recommendation: Provide the estimated cost, planned duration, and evaluation metrics for each pilot program.

This information is included under Section 10.3. Pilot Projects.

Adopted Recommendation: Include a description of Idaho Power's internal vegetation management crew in Section 10.2 of the WMP

In 2026, Idaho Power transitioned its Internal Vegetation Management Crew pilot into a full-time, permanent program. Accordingly, discussion of the Internal Vegetation Management Crew is no longer relevant under Section 10 of the WMP. Instead, the requested description has been included under Section 13.3.4. Internal Vegetation Management Crew.

Adopted Recommendation: Adopt and further develop industry best practices in configuration management, requirements management, test management, and issue and defect tracking for all custom models or software developed for the FPI tool, as well as other custom developed models or applications that play a critical role in the company's WMP.

Idaho Power understands this recommendation as pertaining to situational awareness tools developed internally by the company to inform operational decision making to reduce wildfire threats and risks as required by Idaho Code 61-1803(3)(f), including the company's custom Fire Potential Index (FPI) tool and any related models or applications. As a point of clarification, the company notes that the FPI tool is not a traditional software application but rather a predictive indicator of wildfire-potential derived from a set of equations that utilize

weather forecasts. As such, the FPI tool is not subject to all elements of a conventional software development lifecycle and does not undergo a process for software configuration management, requirements management, and issue and defect tracking similar to other developed software programs. However, Idaho Power recognizes the importance of applying governance and control practices consistent with the role the FPI tool plays in supporting wildfire risk assessment and operational decision-making. Accordingly, the FPI process is reviewed annually to assess and validate Idaho Power's wildfire preparedness approach, as discussed in Section 4.3. FPI Review and Evaluation.

Since the original development of the FPI tool, Idaho Power has continued to refine the tool's performance through maintenance and validation of the models and datasets supporting its underlying components. As an example, the Weather Component of the FPI tool considers data sourced from Weather Research and Forecasting (WRF) models produced by Idaho Power using its High-Performance Computing system, as well as other publicly available national models. Idaho Power's WRF model has been evaluated, refined, and parameterized to model Idaho's topography and climate.

As more fully discussed in Section 4.4. Ensemble Forecast System, Idaho Power intends to further enhance Weather Component calculations for the FPI tool by incorporating the Ensemble Forecast System, which is a system developed by Idaho Power in partnership with the National Center for Atmospheric Research that produces multiple custom, high-resolution weather forecast models throughout the day.

Adopted Recommendation: Expand the description of resources available to call center agents during a PSPS event within Appendix B.

A description of resources available to Idaho Power customer service representatives during a PSPS event is included under Section 5.2 of *Appendix B: Wildfire Public Safety Power Shutoff Plan.*

Adopted Recommendation: Identify average project costs, including installation costs for steel poles, fire mesh wraps, wildfire detection cameras, undergrounding, covered conductors, fiberglass cross-arms for wooden poles, and weather stations.

This information is contained within *Appendix H: Average Mitigation Project Costs (Confidential)*.

Adopted Recommendation: Include all metrics used in the WMP within their respective sections and present in a format that enables tracking across versions of the WMP.

The targets and metrics of relevant sections of the WMP are documented within *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029* to facilitate ease of reference and tracking across WMP versions.

Adopted Recommendation: Establish and publish annual mileage targets for all transmission and distribution ("T&D") hardening programs and projects by wildfire risk zone tier or feeder, along with modeled ignition risk reduction per mile for each category.

Annual mileage targets for all T&D hardening programs have been included in *Appendix F: Wildfire Mitigation Activities and Cost Forecasts 2027–2029*. In addition, *Appendix G: Grid Hardening List* identifies the projects Idaho Power plans to complete in 2027, along with the associated line miles and corresponding wildfire risk zone tier for each project.

In accordance with Commission Order No. 37004, the company is in the process of developing its approach to risk reduction and mitigation effectiveness modeling. As such, Idaho Power plans to use this information to inform its WMP beginning with its 2028 plan.

Adopted Recommendation: Adopt an effectiveness scorecard for each grid hardening method—including, but not limited to, covered conductor, non-wooden poles, non-wooden crossarms, and undergrounding—based on industry guidance.

In accordance with Commission Order No. 37004, the company is in the process of developing its approach to risk reduction and mitigation effectiveness modeling. As such, Idaho Power plans to start using this information to inform its WMP beginning with its 2028 plan.

Adopted Recommendation: Include a table in the WMP identifying all T&D rebuild and grid hardening projects undertaken as part of Idaho Power's wildfire mitigation strategy, including the project name, type, primary driver, location, design standards, anticipated timeline, and estimated costs, as well as an explanation of whether wildfire mitigation priorities affected any aspect of the project, such as design, cost, or schedule.

This information is included in *Appendix G: Grid Hardening List.*

Adopted Recommendation: Conduct cost-benefit analyses on a project-by project basis to demonstrate that each project reasonably balances costs with reductions in wildfire risk.

See Section 3.5. Risk Informed Mitigation Evaluation Framework, which discusses Idaho Power's Risk-Informed Mitigation Evaluation Framework (Framework) to support the planning-level evaluation of both costs and benefits associated with line infrastructure projects primarily driven by wildfire risk reduction. Application of the Framework with respect to line infrastructure projects undertaken as part of Idaho Power's wildfire mitigation strategy in 2027 can be found in Attachment 2 to the Application accompanying this WMP's submission to the IPUC.

Adopted Recommendation: IPUC Staff and the company should work collaboratively to address Staff's remaining recommendations.

Staff's recommendations that remained outstanding following Order No. 37004 were as follows:

1. Include copies of Idaho Power's four most recent quarterly NERC FAC-003-X compliance reports as attachments in future WMPs; include copies of current transmission maintenance and inspection plans used for NERC FAC-501- WECC-X compliance, along with any violations identified in the most recent NERC compliance audit.
2. Expand reporting in future WMPs to include both T&D assets not covered by NERC standards to provide a more comprehensive view of trends and effectiveness across the utility's entire system.
3. Take necessary steps to integrate asset condition and inspection data, as well as failure modes, into ignition models as part of geographic risk modeling and assessment.

Idaho Power met with Commission Staff on July 9, 2026, and understands Staff's outstanding recommendations 1 and 2, which relate to NERC compliance reports and standards, seek information regarding the performance of the company's system following implementation of grid hardening activities. With this understanding, the company has included discussion and data relating to the change in sustained outages by cause code within Section 2C of the Application accompanying this WMP's submission to the IPUC.

With respect to Staff's outstanding recommendation 3, and based on Idaho Power's conversation with Commission Staff on July 9, 2026, the company understands Staff's recommendation to require the company to consider asset condition and inspection data, as well as failure modes, when selecting mitigations. Discussion of how these factors are considered by Idaho Power when evaluating mitigations is included under Section 3.5. Risk Informed Mitigation Evaluation Framework.

Idaho Department of Lands (IDL) recommended that the company provide additional descriptive narrative regarding the data used to develop its risk model, including a discussion of diminishing returns within its cost-benefit analysis and the impact of electrical service disruptions when making mitigation decisions.

Idaho Power met with IDL to discuss these recommendations, including the company's risk modeling approach and model inputs. Idaho Power understands the importance of considering local, state and national risk assessments and mitigation plans. Accordingly, additional details regarding the modeling inputs used by the company in its updated risk analysis have been added under Section 2.2.2. 2027 Wildfire Risk Zone Modeling and Validation. As part of developing a project-by-project cost-benefit framework to inform future iterations of its WMP, beginning in 2028 pursuant to Commission Order No 37004,

the company will discuss diminishing returns and the impact of electrical service disruptions when making mitigation decisions.

IPUC Order No. 36929, Case No. GNR-E-25-02

The following contains the directives contained exclusively in IPUC Order No. 36929 that pertain to Idaho Power's development and submission of WMP filings, including specific content requirements.

All electric corporations shall include a glossary within each WMP that defines each utility's terms, and that those terms should be consistent with the WSCA and with the Commission WMP Guidelines (issued through Order No. 36774).

This information is contained within *Appendix I: Glossary of Terms*

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

The following contains other directives contained in IPUC Order No. 36774 that pertain to Idaho Power's development and submission of WMP filings, including specific content requirements.

An update of lessons learned from the previously approved WMP within the annual filings for WMP review and approval.

An update of 2026 lessons learned is discussed within Section 13.3. 2026 Lessons Learned.

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.

This information is included in Section 14. WMP Cost Summary and *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029*.

A section in which Idaho Power describes how it addresses each of the IPUC's orders and Staff's recommendations.

This information is contained within this *Appendix D*.

Rolling WMPs shall be developed with a minimum three-year planning horizon.

Idaho Power developed projections for a 3-year planning horizon, as presented within *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029*.

An explanation of 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.

This information is addressed within Section 3. Cost-Benefit Approach, Section 8. Methods of Line Design, Section 14. WMP Cost Summary, and within Attachment 2 to the Application accompanying this WMP's submission to the IPUC.

WMPs must include a cost-benefit analysis that justifies the expenditures for risk mitigation described within.

This information is included within Section 3. Cost-Benefit Approach. See also Section 14. WMP Cost Summary and Attachment 2 to the Application accompanying this WMP's submission to the IPUC.

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

The following contains the directives contained exclusively in IPUC Order No. 36742 that pertain to Idaho Power's development and submission of WMP filings, including specific content requirements.

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 10.3. Pilot Projects. The company's approach to balancing mitigation costs with the resulting reduction of wildfire risks specific to pilot projects is discussed in Section 3. 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.

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. With this in mind, see Section: 3.5. Risk Informed Mitigation Evaluation Framework, as well as 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, 10.3.4. Covered Conductor (Pilot) and Attachment 2 to the Application accompanying this WMP's submission to the IPUC.

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.

Pursuant to Commission Order No. 37004, the first portion of this requirement has been superseded by Commission Order No. 36774, which states that WMP's shall be developed with a minimum 3-year planning horizon. *Appendix F: Wildfire Mitigation Activities and Cost Forecast 2027–2029* addresses this requirement. With respect to the company's exploration of methods to reduce costs with communication and education regarding wildfire and PSPS, Idaho Power continues to evaluate opportunities to reduce costs related to these activities, in part through partnering with local emergency managers on community preparedness events and efforts as described in Section 11.2. Community Engagement.

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

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

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 10.3.2. Wildfire Resilience Partnerships and Fuels Reduction Shared Stewardship (Pilot), and Section 12. Government, Industry, and Peer Utility Outreach.

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 (DOE) 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	Pending Contract Negotiation
Idaho Wildfire Resilience Investment Program (WRIP)	Strategic Overhead to Undergrounding of powerlines	OEMR	$650	2026–2027	Active Project

2027 WMP Major Updates/Changes

Below is a high-level summary of the major updates and changes to Idaho Power's WMP since it was last filed with the IPUC on October 10, 2025, in Case No. IPC-E-25-32.

- Updated risk modeling process description within Section 2, along with updated wildfire risk zone boundaries as shown in *Appendix C: Wildfire Risk Zone Map Book*.
- Updates to Section 3: Cost-Benefit Approach to align with requirements from Commission Order No. 37004.
- Section 7. Infrastructure Inspection and Asset Management was revised in some areas to provide readers with additional clarity on Idaho Power's Infrastructure and Asset Management programs. The described programs remain unchanged.
- Section 9. Vegetation Management was re-written to provide readers with additional clarity with respect to Idaho Power's vegetation management programs. The described vegetation management programs remain unchanged.
- Consistent with Commission Order No. 37004, additional information, including evaluation metrics, duration and annual costs, was added for each pilot listed under Section 10.3. *Pilot Projects*.
- The addition of *Appendix G: Project Hardening List, Appendix H: Average Costs of Mitigation Costs (Confidential),* and *Appendix I: Glossary of Terms*.
- Updates to Section 13.3. 2026 Lessons Learned.

Montana WMP Requirements

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

Pursuant to Montana Code Section 69-2-302, Idaho Power also filed this WMP with its statutory "approval authority," as the appropriate body responsible for its corporate governance. No additional requirements were added by Idaho Power's approval authority upon their approval of the 2026 WMP. Montana Code Section 69-2-302 establishes requirements for the WMP as to the Montana portion of this plan. The below crosswalk identifies where the plan meets Montana Code Section 69-2-302's requirements.

Montana Requirement—Montana Code 69-2-302	Corresponding Location in WMP
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;	Section 2. Geographical Risk Assessment *Appendix C: Wildfire Risk Zone Map Book* *Appendix E: Idaho Power Transmission Line Map Book*
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;	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 10. Additional Preventative Actions and Programs *Appendix A. Wildland Fire Preparedness and Prevention Plan*
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;	Section 9. Vegetation Management Section 10. Additional Preventative Actions and Programs Section 12. Government, Industry, and Peer Utility Outreach *Appendix F: Wildfire Mitigation Activities and Cost Forecast—2027–2029*
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;	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 10. Additional Preventative Actions and Programs *Appendix A: Wildland Fire Preparedness and Prevention Plan* *Appendix B: Wildfire Public Safety Power Shutoff Plan*

Montana Requirement—Montana Code 69-2-302	Corresponding Location in WMP
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;	Section 6. Mitigation Activity: Line Operation Practices *Appendix B: Wildfire Public Safety Power Shutoff Plan*
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;	Section 6. Mitigation Activity: Line Operation Practices *Appendix B: Wildfire Public Safety Power Shutoff Plan*
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;	Section 14. WMP Cost Summary *Appendix F: Wildfire Mitigation Activities and Cost Forecast—2027–2029*
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	Section 11. Public Outreach and Engagement *Appendix B: Wildfire Public Safety Power Shutoff Plan*
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.	Section 12. Government, Industry, and Peer Utility Outreach

Appendix E
Idaho Power Transmission Line Map Book

Appendix E.
Idaho Power Transmission Line Map Book

October 2026

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

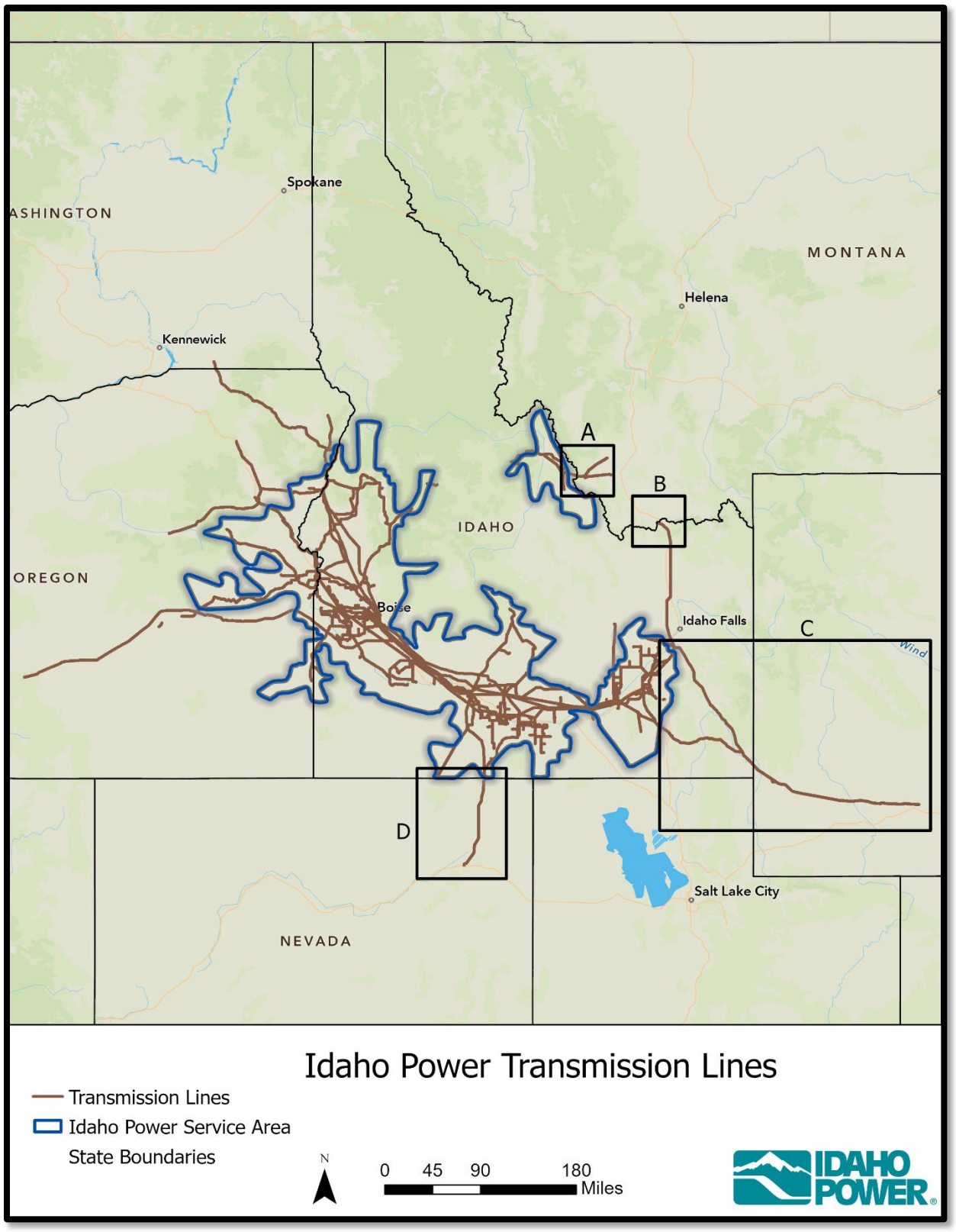


Figure 1
Idaho Power transmission lines

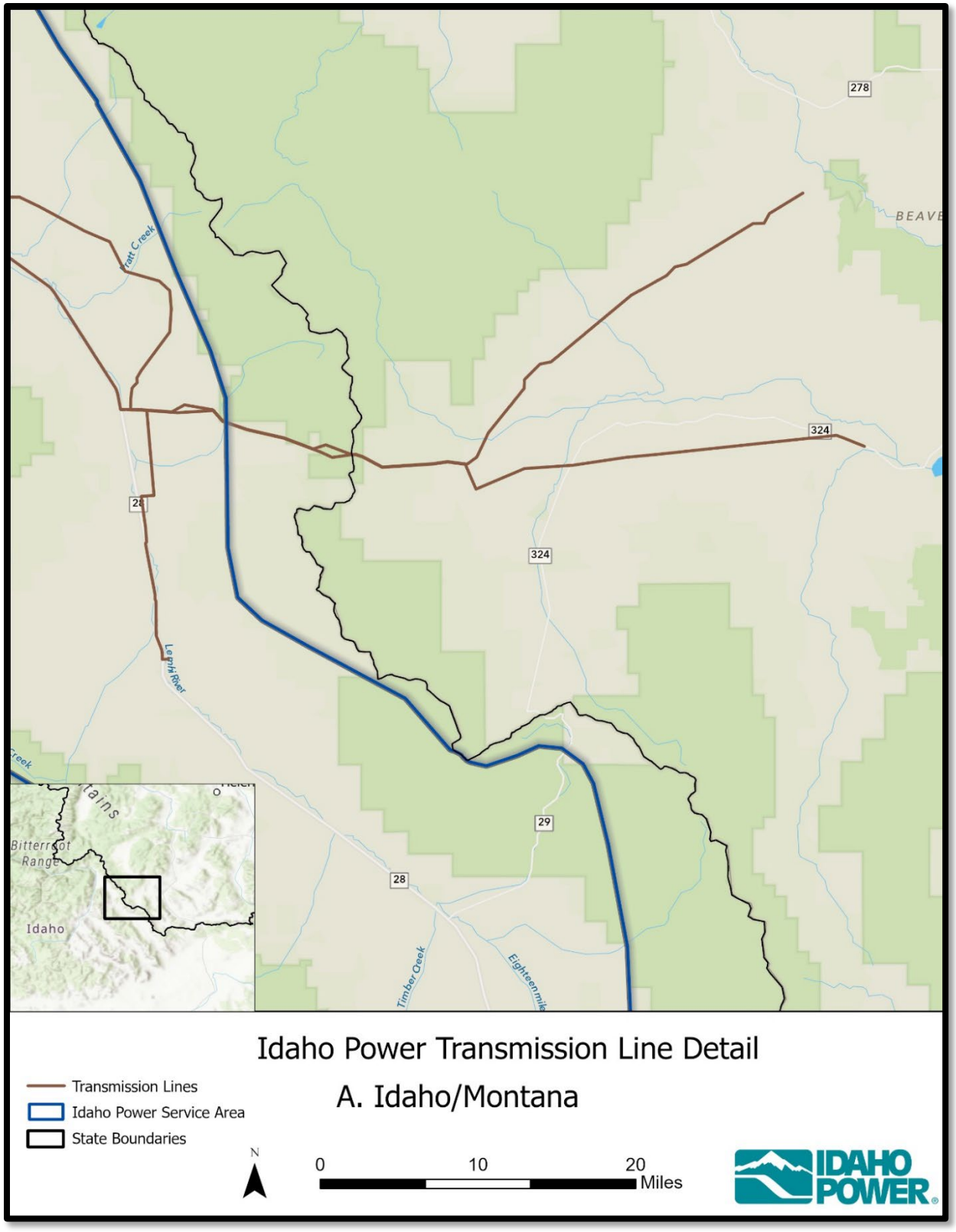


Figure 2
Idaho Power transmission line detail—A. Idaho/Montana

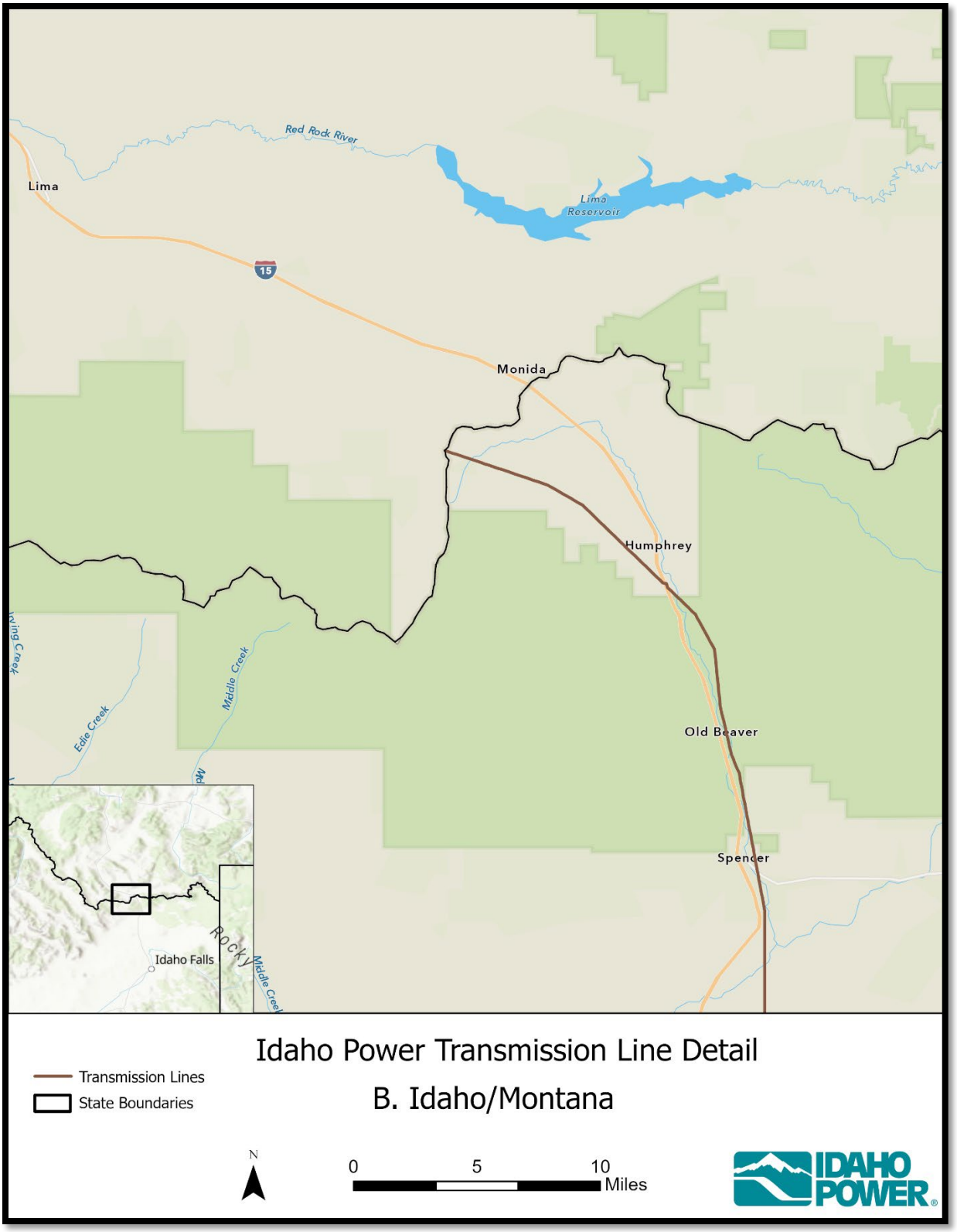


Figure 3
Idaho Power transmission line detail—B. Idaho/Montana

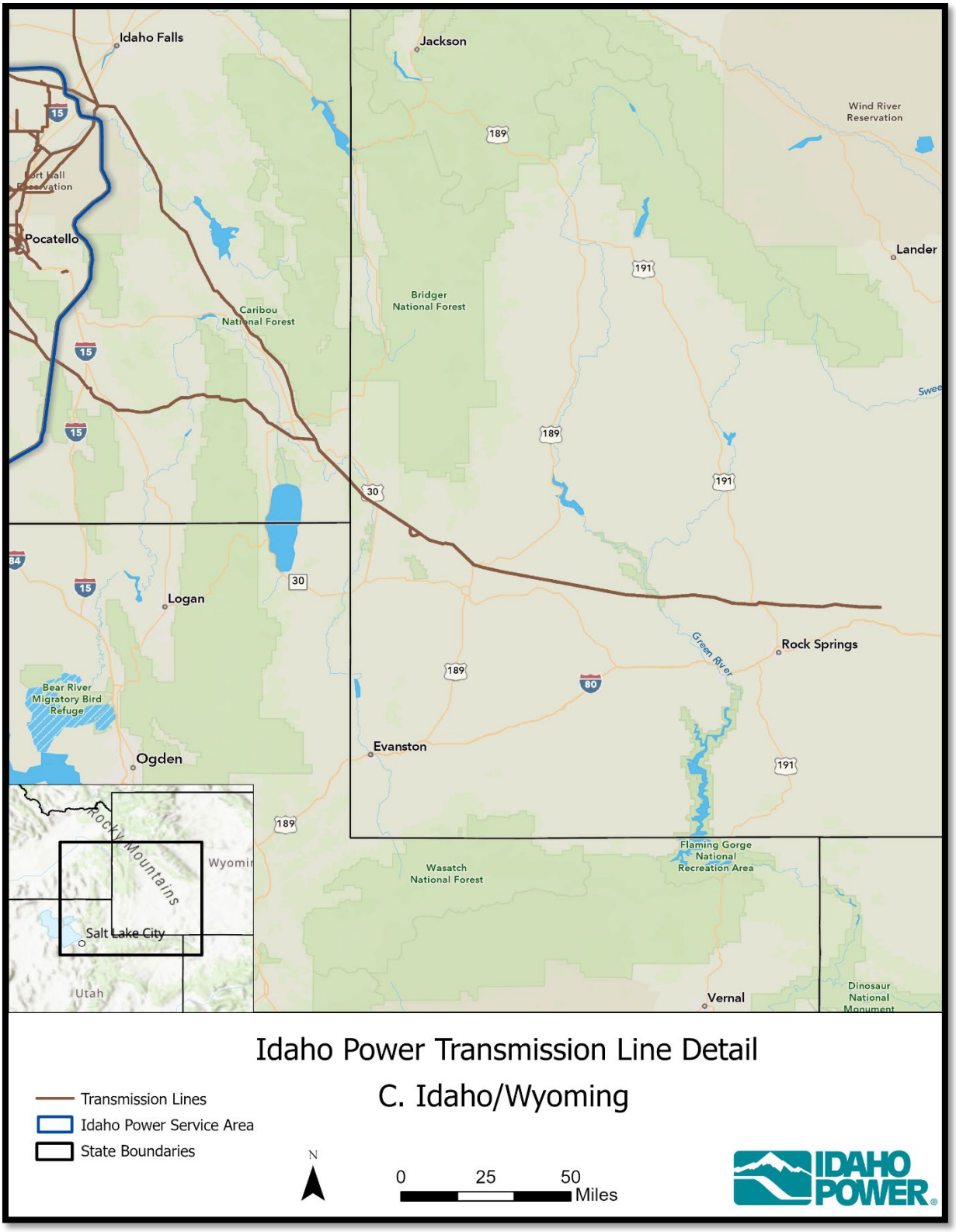


Figure 4
Idaho Power transmission line detail—C. Idaho/Wyoming

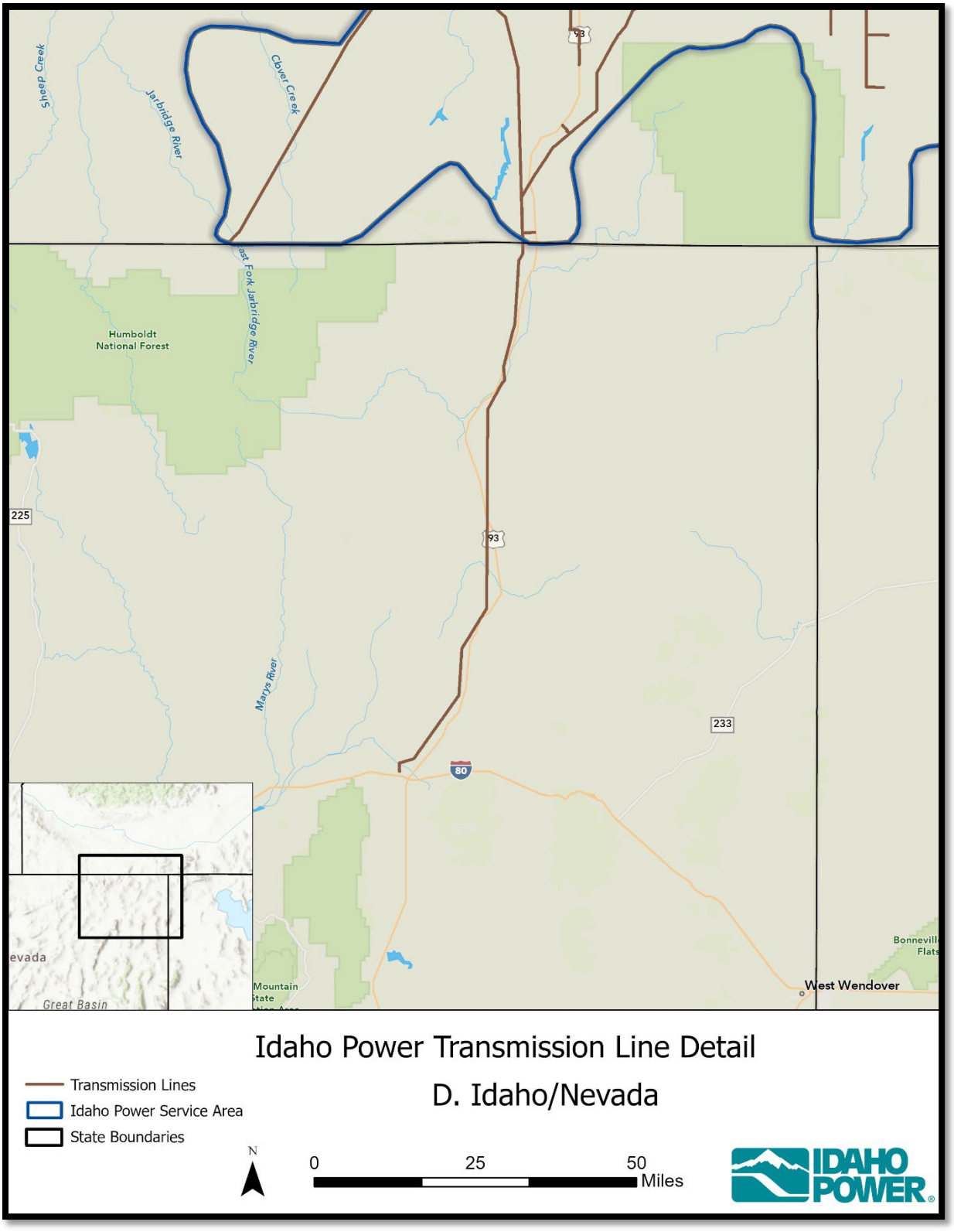


Figure 5
Idaho Power transmission line detail—D. Idaho/Nevada

Appendix F
Wildfire Mitigation Activities and Cost Forecast 2027–2029

Appendix F.
Wildfire Mitigation Activities and Cost Forecast 2027–2029

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Table 1

Estimated O&M expenses for wildfire mitigation, $000s (2027–2029)*

*As of October 1, 2026. 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	2027 Forecast	2028 Forecast	2029 Forecast
A. Geographical Risk Assessment			
Risk Modeling—Risk Maps, Fire Simulation, Probabilistic Model Development and Support	$2,273	$2,347	$2,464
B. Situational Awareness and Monitoring			
Weather Forecasting—System Development and Support, Data Services, Climatology	$96	$96	$96
Weather Forecasting Personnel—Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS)	$172	$177	$182
Weather Forecasting—Weather Station Maintenance	$219	$241	$260
Pole Loading Modeling & Assessment (Contract service)	$72	$72	$72
Wildfire Detection Cameras	$288	$315	$340
C. Workforce Preparedness			
Tools/Equipment	$19	$24	$24
International Wildfire Risk Mitigation Consortium	$40	$40	$40
D. Infrastructure Inspection and Asset Management			
O&M Component of Capital Work	$493	$592	$651
Annual O&M T&D Patrol Maintenance Repairs	$125	$137	$151
Transmission Thermography Inspection Mitigation	$48	$48	$48
Distribution Thermography Inspection Mitigation	$48	$48	$48
Thermography Technician Personnel	$164	$169	$171
Transmission Wood Pole Fire Resistant Wraps	$239	$239	$239
Wildfire Mitigation Program Labor	$1,242	$1,279	$1,318
Patrolmen for Wildfire Pre-Season Inspections in Wildfire Risk Zones	$431	$444	$457
Covered Wire Evaluation—Pilot Program in PSPS Zones	$2	$3	$0

Wildfire Mitigation Program Description	2027 Forecast	2028 Forecast	2029 Forecast
Drone Beyond Visual Line of Sight Waiver for PSPS Patrols	$0	$115	$0
UAS (drone) Inspection Pilot	$867	$895	$922
E. Vegetation Management			
Transition to/Maintain 3-year Vegetation Management Cycle (includes Enhanced Practices for Distribution Tier 3 & Tier 2 Risk Zones)	$42,134	$44,609	$49,099
Internal Tree Trimming Crew	$769	$792	$816
Line Clearing Personnel	$197	$203	$209
Fuel Reduction Program	$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
Public Meetings/Event Fees for PSPS Engagement, Maps, Flyers	$8	$10	$10
Community and Customer Engagement and Outreach	$180	$185	$191
G. Line Operations Practices PSPS/Emergency Preparedness and Technology			
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	$216	$216	$216
Fire Suppression Resources	$180	$186	$191
Standby Helicopter Service	$287	$287	$296
Community Resource Centers	$5	$5	$5
Total	$51,050	$54,010	$58,752

Table 2
Wildfire mitigation forecasted capital investments, $000s, (2027-2029)*

Mitigation Program	Program Description	2027 Planned in Service	2028 Planned in Service	2029 Planned in Service
Overhead Primary Hardening Program	Systematic replacement and upgrades of hardware and equipment	$21,000	$24,000	$36,900
Strategic Undergrounding	Select conversion of overhead to underground distribution in Tier 3 Risk Zones	$12,000	$12,000	$23,000
Recloser Segmentation and Communication Upgrades	Installation, relocation, and expanded communication for automatic reclosing overcurrent protection devices	$350	$600	$200
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	$35	$35	$0
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	$100	$70	$70
Total		**$33,485**	**$36,705**	**$60,170**

*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 (2027–2029)*

Wildfire Mitigation Plan Asset Inspection Initiatives	2027 Goal	2028 Goal	2029 Goal
Transmission Inspections			
Wildfire Pre-Season Patrol (Annual Visual Inspection)—(Structures)	1,525	1,525	1,525
Infrared Thermography Patrol (Structures)	1,525	1,525	1,525
Distribution Inspections			
Wildfire Pre-Season Patrol (Annual Visual Inspection)—(Poles)	23,475	23,475	23,475
Infrared Thermography Patrol—Tier 3 Zones (Poles)	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 2027 WMP. They are subject to change in future WMPs.

Table 4
Distribution asset management and situational awareness targets (2027–2029)**

Initiative	Wildfire Mitigation Plan Activity	2027 Target	2028 Target	2029 Target
Distribution System Hardening*	System Hardening (miles)	78	80	130
	Overhead Line Converted to Underground (miles)	13	13	25
Feeder Segmentation	Installation or Relocation of Automatic Reclosing Devices	6	12	4
Wildfire Detection Cameras	Cameras enabled with artificial intelligence to detect smoke and notify first responders	1	1	0
Atmospheric Science Weather Stations	Installation of weather stations to gain situational awareness	5	3	3

*Excludes reliability improvement projects outside of wildfire risk zones

** The targets shown are based on the contents of Idaho Power's 2027 WMP. They are subject to change in future WMPs.

Table 5
2027–2029 vegetation management targets (2027–2029)*

Wildfire Mitigation Plan Vegetation Management Initiatives*	2027 Goal (ID)**	2028 Goal (ID)	2029 Goal (ID)
Wildfire Mitigation Inspection Patrol/Mitigation (Number of T&D Circuits)	177	177	177
Line Clearing Cycles Patrol/Mitigation (Number of T&D Circuits)	209	265	273
Mid Cycle Patrol/Mitigation (Cycle Busters) (Number of T&D Circuits)	54	38	61
QA/QC Audit Patrols	100% of WRZs	100% of WRZs	100% of WRZs
Targeted Pole Clearing (Number of Poles)	500 Poles	500 Poles	500 Poles

*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 2027 WMP. They are subject to change in future WMPs.

** Circuit numbers can potentially change due to circuit cutovers or reconfigurations.

*** Circuit as used for wildfire mitigation patrols means the portion of the circuit that is located within the wildfire risk zone boundaries.

Appendix G
Grid Hardening List

Appendix G.
Grid Hardening List

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Grid Hardening List

The table below identifies infrastructure projects primarily driven by wildfire risk reduction described in Section 8 of the WMP that Idaho Power plans to undertake in 2027 as part of its wildfire mitigation strategy. Idaho Power's goal is to complete 100% of the work identified in the below table; however, emergencies, operational issues, access issues, permitting delays or other unplanned events can occur and disrupt the planned work. All work is completed in accordance with safety and applicable requirements. Inclusion of a project on this table reflects Idaho Power's good faith representation of its construction plans for 2027; it is not a guarantee that a project will be constructed exactly as described or even at all.

The estimated costs are planning-level cost categories used to identify the relative scale of mitigation investment planned in 2027. Cost categories reflect planning-level estimates available at the time of preparing the Idaho and Montana 2027 Wildfire Mitigation Plan (WMP). Actual project costs may change once project scopes are refined and engineering, permitting, procurement, bidding, field investigations, and construction planning activities progress. As such, the estimated cost categories are provided only for the purpose of review and approval of the WMP pursuant to the Wildfire Standard of Care Act. They should not be used for any other purpose.

Project Description, Location, and Standards

Project Name	Timeline	Location (County/City)	Project Type, Description and Design Standards	WRZ Tier	Estimated Cost Category	Line Miles
Pocatello—13 2027-01	2027	Bannock County—Southwest of Pocatello	Distribution, OH to UG conversion with line relocation, Section 8.4.2 of 2027 WMP	3	Less than $1 million	1.1
Eckert—41 2027-01	2027	Boise County—Idaho City	Distribution, OH to UG conversion, Section 8.4.2 of 2027 WMP	3	$1 million to less than $5 million	2.3
Horseshoe Bend—41 2027-01	2027	Boise County—Northeast of Terrace Lakes	Distribution, OH to UG conversion, Section 8.4.2 of 2027 WMP	3	$1 million to less than $5 million	2.4
McCall—41 2027-01	2027	Valley County—Ponderosa State Park	Distribution, OH to UG conversion, Section 8.4.2 of 2027 WMP	3	$1 million to less than $5 million	2.5

Project Name	Timeline	Location (County/City)	Project Type, Description and Design Standards	WRZ Tier	Estimated Cost Category	Line Miles
Boulder—41 2027-01	2027	Valley County—Eastside Drive	Distribution, OH to UG conversion, Section 8.4.2 of 2027 WMP	3	$1 million to less than $5 million	5.9
Ketchum—13 2027-01	2027	Blaine County — North of Ketchum	Distribution, OH to UG conversion, Section 8.4.2 of 2027 WMP	3	Less than $1 million	0.37
Horseshoe Bend—41 2027-02	2027	Boise County—Crouch	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	Less than $1 million	4.7
Portnuef—42 2027-01	2027	Bannock County—Southeast of Pocatello	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	Less than $1 million	3.1
Salmon—14 2027-01	2027	Lemhi County—East of Salmon	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	$1 million to less than $5 million	5.8
Terry—16 2027-01	2027	Bannock County—East of Pocatello	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	Less than $1 million	4.9
Terry—16 2027-02	2027	Bannock County—East of Pocatello	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	$1 million to less than $5 million	6.1
Terry—16 2027-03	2027	Bannock County—East of Pocatello	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	$1 million to less than $5 million	7.0
Eckert—41 2027-02	2027	Boise County—Idaho City	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	$1 million to less than $5 million	9.6
McCall—41 2027-02	2027	Valley County—Northeast of McCall	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	Less than $1 million	2.3
Horseshoe Bend—41 2027-03	2027	Boise County—East of Terrace Lakes	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	3	Less than $1 million	4.9
Bruneau Bridge—44 2027-01	2027	Elmore County—Southwest of Mountain Home	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	2	$1 million to less than $5 million	8.1
Beacon Light—11 2027-01	2027	Ada County—North of Star	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	2	$1 million to less than $5 million	6.3
Bruneau Bridge—44 2027-02	2027	Elmore County—South of Mountain Home	Distribution, OH Hardening, Section 8.4.1 of 2027 WMP	2	$1 million to less than $5 million	15.0

Appendix H
Average Mitigation Project Costs (Confidential)

CONFIDENTIAL

Appendix H.
Average Mitigation Project Costs

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Average Mitigation Project Costs

Mitigation Type	Unit	Average Project Installation Cost*
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
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[redacted]

Appendix I
Glossary of Terms

Appendix I.
Glossary of Terms

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Glossary of Terms

Unless otherwise expressly stated, the following words and terms, for the purposes of the WMP, have the meanings shown in this appendix.

Term	Acronym	Definition
Annual		All references to 'annual' or 'annually' in this WMP mean once per calendar year, unless stated otherwise.
Audit		Throughout the WMP, the term 'audit' is used in an informal context and does not mean a formal audit conducted by the company's Audit Services Department or by an outside auditing firm.
Bureau of Land Management	BLM	An agency within the United States Department of the Interior responsible for administering United States federal lands.
Community Resource Center	CRC	Facilities that provide critical information to customers impacted by outages. The CRC may also provide impacted customers with access to other services, such as device charging, internet access, clean water, and ice.
Consequence		Estimation of potential wildfire impacts under fire spread simulations to specific resources (natural) and assets (human-made), such as residences, population, and acreage.
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.
Cycle Busters		Vegetation identified by the Utility Arborist as exhibiting growth rates that may result in encroachment into line clearances before the next scheduled pruning cycle.
Dead Fuel Moisture	FD	The amount of water contained in vegetation with no living tissue, expressed as a percentage of the fuel's oven-dry weight. Dead fuel moisture is governed primarily by atmospheric conditions, including relative humidity, temperature, precipitation, and solar radiation.
Dispatch		Members of Idaho Power's regional and system dispatch group tasked with monitoring the regional grid and electric system.
Emergency Support Function-12	ESF-12	Liaison from a given state's designated emergency support function for energy utilities during an emergency.
Enhanced Powerline Safety Settings	EPSS	Advanced safety settings implemented by Idaho Power on electric utility power lines to reduce wildfire risk. **EPSS 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. **EPSS 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.
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.

Term	Acronym	Definition
Fire Potential Index	FPI	Idaho Power's Landscape-scale index used to assess risk of a wildfire under current and forecasted weather conditions.
Fire Weather Watch	FWW	Issued by the National Weather Service when the combination of dry fuels and weather conditions support extreme fire danger within the next 12 to 72 hours.
Fuels Component	FC	The Fuels Component of the FPI represents the condition of dead and live woody fuels that can potentially support wildfire, and is calculated as the ratio of dead fuel moisture to live fuel moisture
Geographic Information System	GIS	A computer system that analyzes and displays geographically referenced information.
Great Basin Coordination Center	GBCC	The focal point for coordinating resources for wildland fire and other incidents through the Great Basin.
Hazard Trees		Trees identified by the Utility Arborist as showing signs of mortality at the time of patrol or have one or more structural defects that could make the tree likely to fail and fall into or onto power lines.
High Wind Warning	HWW	Issued by the National Weather Service when sustained, strong winds with even stronger gusts are expected or occurring. Generally, for sustained winds of 40 mph or greater lasting for 1 hour or longer, or winds of 58 mph or greater for any duration.
High-Priority Vegetation		Any vegetation condition identified by the Utility Arborist as likely to cause a line outage with a high risk of failure in the next few days or weeks. These are normally tall Hazard Trees. High-Priority Vegetation could also be vegetation that is in good condition but has grown so close to the line that it presents a high risk of coming into contact with the line through a combination of conductor sag and/or wind-induced movement of the conductor or the vegetation.
Line Clearing Cycles		Identification and mitigation of vegetation risk by the Utility Arborist and removal of enough vegetation such that, in the judgment of the Utility Arborist, the vegetation is unlikely to grow into the line clearance envelope before the next cycle pruning. This occurs on both transmission and distribution lines on a periodic basis.
Line Miles		The number of miles of transmission and/or distribution circuits in linear miles, regardless of the number of circuits.
Live Fuel Moisture	LFM	The amount of water contained in living vegetation, expressed as a percentage of the fuel's oven-dry weight. Live fuel moisture is influenced by seasonal atmospheric conditions and plant physiological processes, including water uptake, growth stage, and seasonal phenology. The Growing Season Index is often used as a proxy for estimating live fuel moisture.
Local Emergency Managers		A person assigned a role in a jurisdiction that oversees the day-to-day emergency management programs and activities.
Lock Out		Lock out refers to the condition in which a protection device has operated and remains de-energized until it is manually or remotely reset. Depending on the protection scheme and settings, lockout may occur following one or more trip/reclose attempts or after a single trip.
National Interagency Fire Center	NIFC	A facility in Boise, Idaho, where employees of multiple national and state agencies work together to ensure wildland fire personnel across the United States receive the support and information they need.
National Weather Service	NWS	A government agency that provides weather, water, and climate forecasts and warnings for the United States, its territories, adjacent waters, and ocean areas.

Term	Acronym	Definition
Overhead	OH	Typically used to differentiate overhead electrical circuits from underground electrical circuits.
Particularly Dangerous Situation	PDS	Issued by the National Weather Service for rare situations where long-lived strong and violent weather conditions are possible. This enhanced wording may also accompany severe thunderstorm watches for intense convective windstorms
Point of Delivery		The junction point between the facilities owned by the company and the facilities owned by the customer; or the point at which the company's lines first become adjacent to the customer's property; or as otherwise specified in the company's tariff.
Priority 1 Findings		Defects that, depending on the circumstances, require reporting and repair as soon as reasonably possible, generally within 30 days upon identification by Idaho Power. Timeframes can be extended as a result of conditions, such as access issues, weather, and/or materials lead time.
Priority 2 Findings		Defects that, depending on the circumstances, generally require reporting and correction within 24 months of identification by Idaho Power, 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 Findings		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.
Public Safety Partners		State of Idaho or State of Montana Emergency Support Function-12, Local Emergency Managers, and other agencies or entities that collaborate with Idaho Power to manage, prepare for, and respond to emergencies.
Public Safety Power Shutoff	PSPS	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.
Red Flag Warning	RFW	A term used by fire-weather forecasters to call attention to limited weather conditions of particular importance that may result in extreme burning conditions. It is issued when it is an on-going event or the fire weather forecaster has a high degree of confidence that Red Flag criteria will occur within 24 hours of issuance. Red Flag criteria occurs whenever a geographical area has been in a dry spell for a week or two, or for a shorter period, if before spring green-up or after fall color, and the National Fire Danger Rating System (NFDRS) is high to extreme and the following forecast weather parameters are forecasted to be met: 1) A sustained wind average 15 mph or greater 2) Relative humidity less than or equal to 25 percent and 3) A temperature of greater than 75 degrees Fahrenheit. In some states, dry lightning and unstable air are criteria. A Fire Weather Watch may be issued prior to the Red Flag Warning.
Risk Drivers		Factors that may potentially lead to an ignition, as listed on the left side of Figure 7 in the 2027 Idaho Power WMP.
Subject-Matter Expert	SME	An individual who has advanced knowledge in a specific field.

Term	Acronym	Definition
Supervisory Control and Data Acquisition	SCADA	A system of hardware and software that enables an organization to remotely control and monitor equipment, systems, and processes.
Transmission Line Test		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.
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.
Vegetation Encroachments		Vegetation identified by the Utility Arborist as growing into the clearance envelope of the line. Because of Idaho Power's cycle pruning efforts, Idaho Power generally expects that vegetation encroachments found on vegetation management patrols will be Cycle Busters.
Weather Research and Forecasting	WRF	A state-of-the-art mesoscale numerical weather prediction system designed for both atmospheric research and operational forecasting applications.
Wildfire Hazard		The likelihood and potential intensity of wildfire, regardless of the presence of resources (natural) and assets (human-made).
Wildfire Probability		Whether the landscape is conducive to ignition and spread (i.e., whether the landscape can support an ignition).
Wildfire Risk		The potential for wildfire hazard to impact resources (natural) and assets (human-made) within a geographic area.
Wildfire Risk Zone	WRZ	Geographic area where Idaho Power has infrastructure or equipment that Idaho Power considers may be subject to a heightened risk of wildfire. Idaho Power categorizes its wildfire risk zones as Tier 2 or Tier 3.
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. 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. Montana's wildfire season can be extended by the Montana Department of Natural Resource pursuant to Montana Code §76-13-203.
Wildland-Urban Interface	WUI	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group).
Zone of Protection	ZOP	The area or segment of an electrical power system that is protected by a particular protective device or protection system.