Wildland Fire Risk Mitigation Plan

POWDER RIVER ENERGY CORPORATION

A Touchstone Energy® Cooperative

DRAFT -
May 2025

Planned for finalization and approval,
June 2025

Table of Contents

1. Introduction

A. Purpose and Scope

Powder River Energy Corporation's (PRECorp) Wildland Fire Risk Mitigation Plan (WFRMP) outlines the cooperative's approach to mitigating the risk and impact of wildfires.

This document is a summary of PRECorp's internal practices, programs, and commitments and is intended for general informational purposes.

B. Approvals

This WFRMP has been approved by PRECorp's Board of Directors and Executive Staff.

C. Regulatory Context

This plan complies with Wyoming House Bill 0192 (HB0192) regarding wildfire risk mitigation planning and liability. PRECorp is a not-for-profit electric cooperative, owned by the membership we serve. PRECorp upholds the seven cooperative principles, including concern for community, and embraces wildfire mitigation as a responsibility shared with PRECorp's members and community partners.

D. PRECorp's Commitment to Wildfire Prevention

PRECorp's commitment to wildfire prevention is demonstrated by PRECorp's historic wildfire prevention activities. These activities are outlined in paragraph 2b of this document and include implementation of a WFRMP three years prior to HB0192's enactment.

PRECorp reduces ignition hazards through a three-tiered approach as summarized below. This document explains these three tiers in more detail.

1. Asset management. PRECorp inspects system facilities at regular intervals and makes timely repairs as needed.

2. System hardening. PRECorp is investing in system improvements that reduce wildfire risk. These are often capital-intensive, long-term projects and primarily target PRECorp's overhead distribution lines.

3. Operational Response. When weather conditions dictate, and fire risk is elevated, PRECorp alters system operations to reduce the risk of a wildfire ignition. Operational response includes planning for public safety power shut off (PSPS). These fire-weather procedures reduce ignition risk but can also lead to longer and more frequent power outages.

Meaningful progress in these three tiers relies on (1) PRECorp leadership's commitment to wildfire prevention, (2) empowerment of PRECorp's employees to act in fulfilling the plan, and (3) continued communication with and education of PRECorp's membership and other community stakeholders.

2. Utility Profile & Wildfire Mitigation History

A. Service Area and Infrastructure Overview

PRECorp serves over 12,000 members across the five counties of northeastern Wyoming and a portion of southern Montana as depicted in Figure 1. PRECorp's infrastructure includes over 11,000 miles of power line, 190,000 wood poles, and dozens of power substations. PRECorp's power line is predominately overhead distribution but also comprises underground distribution, sub-transmission (34.5kV), high voltage distribution (HVD, 69kV), and transmission (230kV) line.

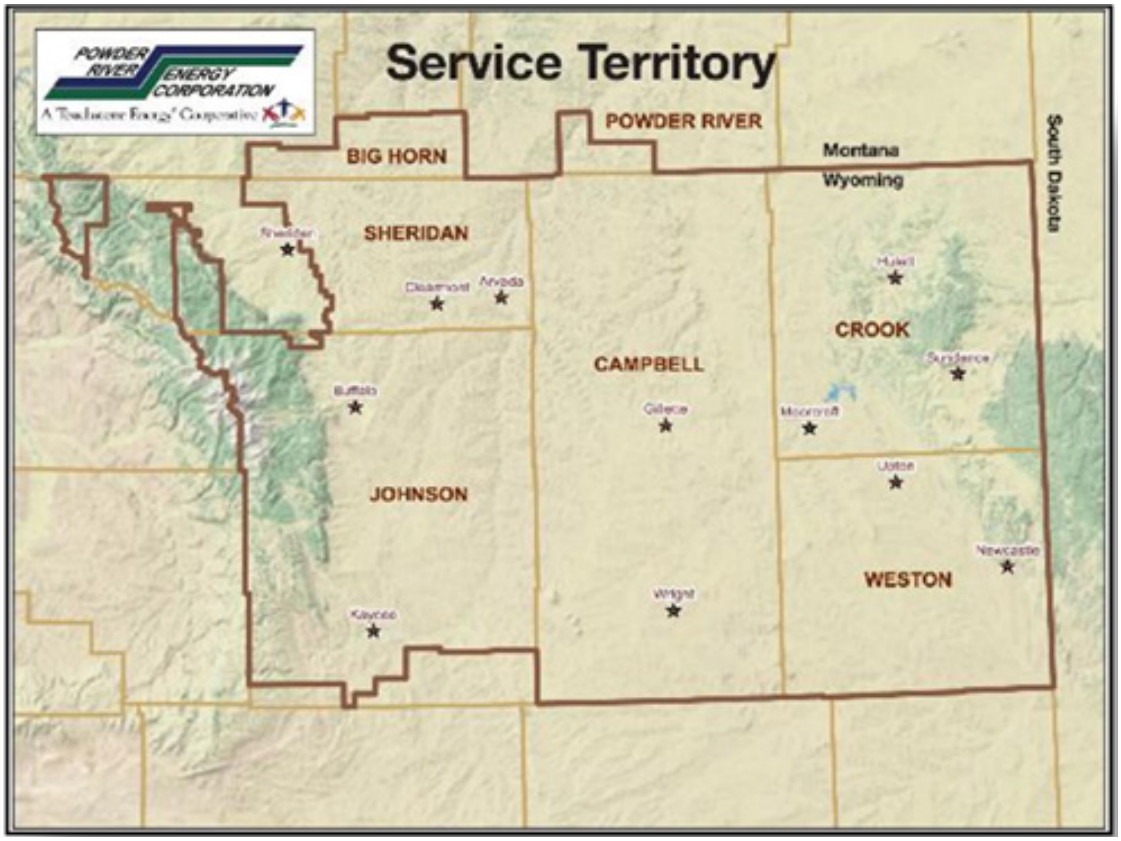

Figure 1. PRECorp Service Territory Map

PRECorp's facilities traverse diverse terrain with varying wildfire risk profiles. Many of PRECorp's power lines cross pasture, range, and prairie in the Powder River Basin where dry grass readily ignites and wildfire may spread rapidly, at a moderate intensity. Forested sections of PRECorp's territory include portions of the Bighorn Mountains, the western Black Hills, and timbered areas in the vicinity of the communities of Hulett, Sundance, and Pine Haven. Generally speaking, the forested areas are more difficult to ignite than grassland but have the potential for more intense wildfires.

Item	Quantity
Meters Served	**27,000**
Distribution Substations	**57**
Bulk Supply Substations	**11**
Miles of sub-transmission, HVD and transmission	**715**
Miles of Underground Distribution	**651**
Miles of Overhead Distribution	**10,078**
% Overhead Distribution non-forested (range, pasture, ag, etc.) (estimated)	**91%**
% Overhead Distribution forested (estimated)	**2%**
% Overhead Distribution developed (estimated)	**7%**

Figure 2. PRECorp Infrastructure Statistics (Source for forested\non-national land cover database 2021)

B. Historic Wildfire Incident Lessons Learned

PRECorp developed and approved its first "Wildland Fire Risk Mitigation Plan (WFRMP)" in 2021 and implemented it during the wildfire seasons of 2022-2024. The WFRMP was developed as part of PRECorp's commitment to wildfire prevention prior to a regulatory incentive to do so. Further demonstrating PRECorp's commitment, in addition

to implementing new operational response procedures, in 2021 PRECorp embarked on three major initiatives as listed below, which are described in more detail later in this document.

- Unmanned Aerial System (UAS \ drone) Inspection (Asset Management) – system wide aerial pole inspection program
- Intelligent Vegetation Management System (IVMS) (Asset Management) – implementation of a satellite-image-based right-of-way management system
- System Protection Upgrades (System Hardening) – revamping PRECorp's approach to protecting and sectionalizing the overhead distribution network.

Since 2016, PRECorp has recorded wildfire incidents when PRECorp's infrastructure was believed to be involved in a wildfire ignition. This includes ignitions initiated by mechanisms that are particularly challenging for power utilities to address such as lightning strikes, public vandalism, and equipment failure resulting from extreme weather (wind) in excess of design parameters. This wildfire incident data has helped shape the WFRMP.

Key lessons gained from past wildfire incidents are listed below.

- When PRECorp's equipment is involved in a wildfire ignition, it often involves interactions with wildlife or equipment failure. Wildlife interactions are often the result of birds or climbing animals contacting live parts. Equipment failures include broken poles, other broken line hardware and faulty electrical connections. Wind and extreme weather are often contributing factors to equipment failures. It is uncommon for vegetation (trees) to contact PRECorp's facilities and initiate a wildfire ignition.
- The number and extent of wildfires is weather dependent and may vary dramatically from year to year. Since 2016, when data collection began, 2024 was the most active fire year in PRECorp's history while 2023 was one of the least active.
- Although wildfires can occur in any month of the year, the typical peak wildfire season is from July through September.
- PRECorp's wildfire incident data (collected since 2016) indicates that PRECorp's underground distribution, sub-transmission (34.5kV), HVD (69kV), transmission (230kV), substation facilities, and personnel operations (equipment, vehicles, power tools) present a (very) low ignition risk.
- There is no record or memory of a public safety power shutoff (PSPS) being implemented at PRECorp as a means to reduce wildfire ignition risk.

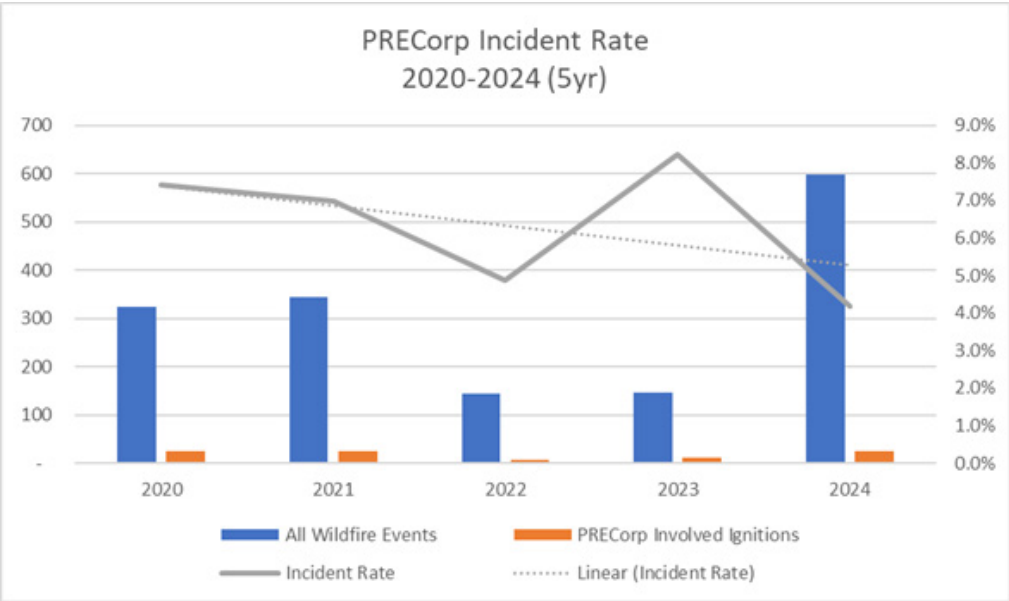

Figure 2 – PRECorp Historic Ignition Rate (Wyoming service territory only)

As a key indicator of PRECorp's wildfire mitigation activities, PRECorp tracks an "incident rate" comparing all reported wildfires in the five counties of northeast Wyoming with ignitions involving PRECorp facilities (PRECorp recorded incidents), depicted in Figure 2. Historically, PRECorp's facilities have been involved in 6% (five-year average 2020-2024) of all wildfire ignitions in northeast Wyoming.

Since implementing the WFRMP in 2022, PRECorp has enhanced its understanding of wildfire hazards through field experience, data review, and cooperation with electric utility industry partners. This learning has informed several proactive measures, including revised vegetation management approaches, programs for satellite-based vegetation analysis, system protection setting adjustments during fire season, and unmanned aerial system (UAS or drone) inspection programs. PRECorp's wildfire mitigation efforts will continue to evolve as the electric utility industry adapts to this emerging area of focus.

3. Wildfire Risk Assessment

A. Infrastructure Risk Assessment

PRECorp has identified overhead distribution circuits (or line sections) with heightened wildfire risk using the following three inputs in the risk assessment process.

1. Historic incident data. This data indicates that wildfire ignition risk is very low for PRECorp's substations, underground distribution, transmission, high-voltage distribution facilities, and personnel activities. Wildfire prevention efforts are most effectively focused on overhead distribution line.

2. Local knowledge and experience of a geographic area's ignition potential, terrain, vegetation types, fire suppression difficulty, and proximity to infrastructure and important assets.

3. The Wyoming Wildfire Risk Assessment Portal (WYWRAP) as detailed in Paragraph 3b.

B. WYWRAP Overview

The Wyoming Wildfire Risk Assessment Portal (WYWRAP) is a comprehensive web mapping application that provides tools needed to assess wildfire risk. WYWRAP is part of the broader West Wide Wildfire Risk Assessment (WWA) initiative and is maintained by the Wyoming State Forestry Division.

WYWRAP provides several important data layers that inform PRECorp's wildfire risk assessment:

1. Wildfire Threat Index - This composite layer identifies areas with significant potential for wildfire occurrence based on historical fire density and environmental factors. Areas with elevated scores in PRECorp's service territory include portions of the Black Hills region, areas along the eastern slopes of the Bighorn Mountains, and select locations in the Powder River Basin.

2. Fire Effects Index - This layer models potential wildfire intensity and rates of spread, indicating where fires could become most damaging. The highest values in PRECorp's service territory typically occur in forested areas with heavy fuel loads and challenging terrain.

3. Values at Risk - These layers identify community assets that could be threatened by wildfire, including:
   - Homes and structures (Population density)
   - Critical infrastructure (hospitals, schools, power facilities)
   - Community values (recreational areas, historical sites, water sheds)

4. Fire Response Accessibility - This assessment indicates areas where fire suppression efforts would be most challenging due to limited road access, steep terrain, or distance from fire stations. Sections of PRECorp's service territory with mountainous terrain score high in this category.

5. Canopy Fire Potential - This layer identifies areas where fire could transition from ground-level to tree canopies, creating higher-intensity crown fires. The western Black Hills region and portions of the Bighorn foothills within PRECorp's service territory show elevated risk in this category.

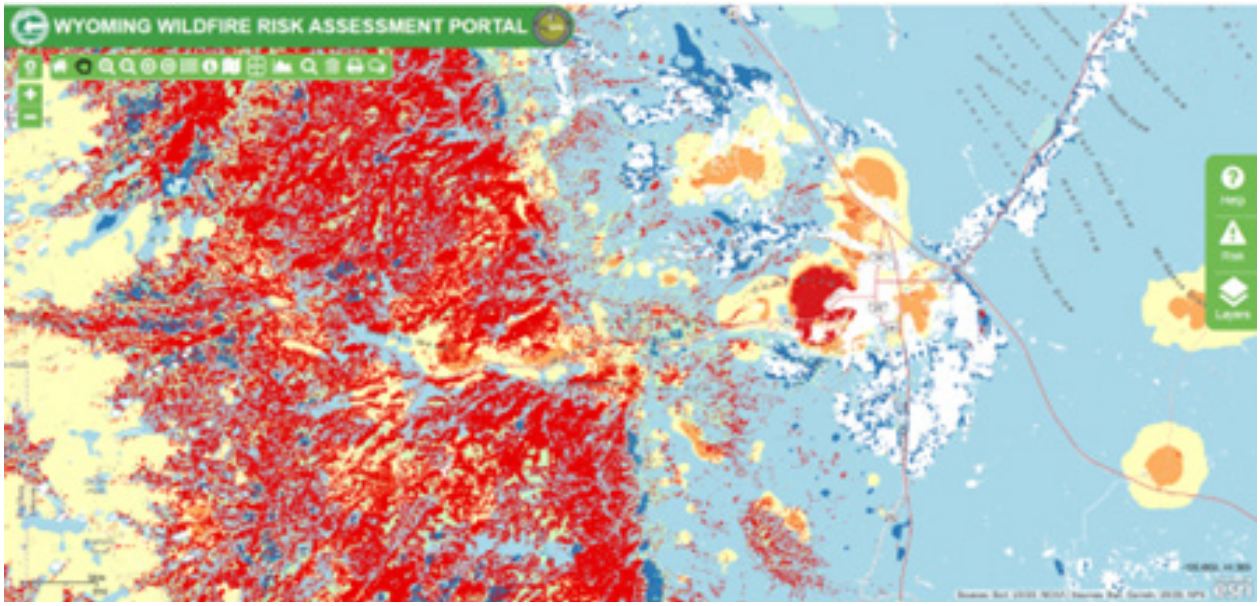

Figure 3. WYRAP in vicinity of PRECorp's Mountian Line (Tap)

C. PRECorp Risk Assessment and Risk Identification

PRECorp utilizes these WYWRAP layers in a multi-step analysis process as described below. The risk analysis is then corroborated with PRECorp's (1) historical incident and (2) local knowledge and experience.

1. Electrical infrastructure maps are overlayed with WYWRAP data layers to identify where PRECorp assets intersect with areas of elevated wildfire risk.

2. Particular weight is given to the Wildfire Threat Index, Canopy Fire Potential, and Fire Effects Index when determining heightened wildfire risk areas.

3. The WYWRAP risk analysis is then corroborated with PRECorp's (1) historical incident and (2) local knowledge and experience.

This approach ensures that PRECorp's risk assessment is data driven. PRECorp's mitigation efforts can be focused on areas where risk reduction has the greatest benefit to PRECorp's members and communities. Using this assessment approach, PRECorp has identified areas with heightened wildfire risk as shown in Figure 4.

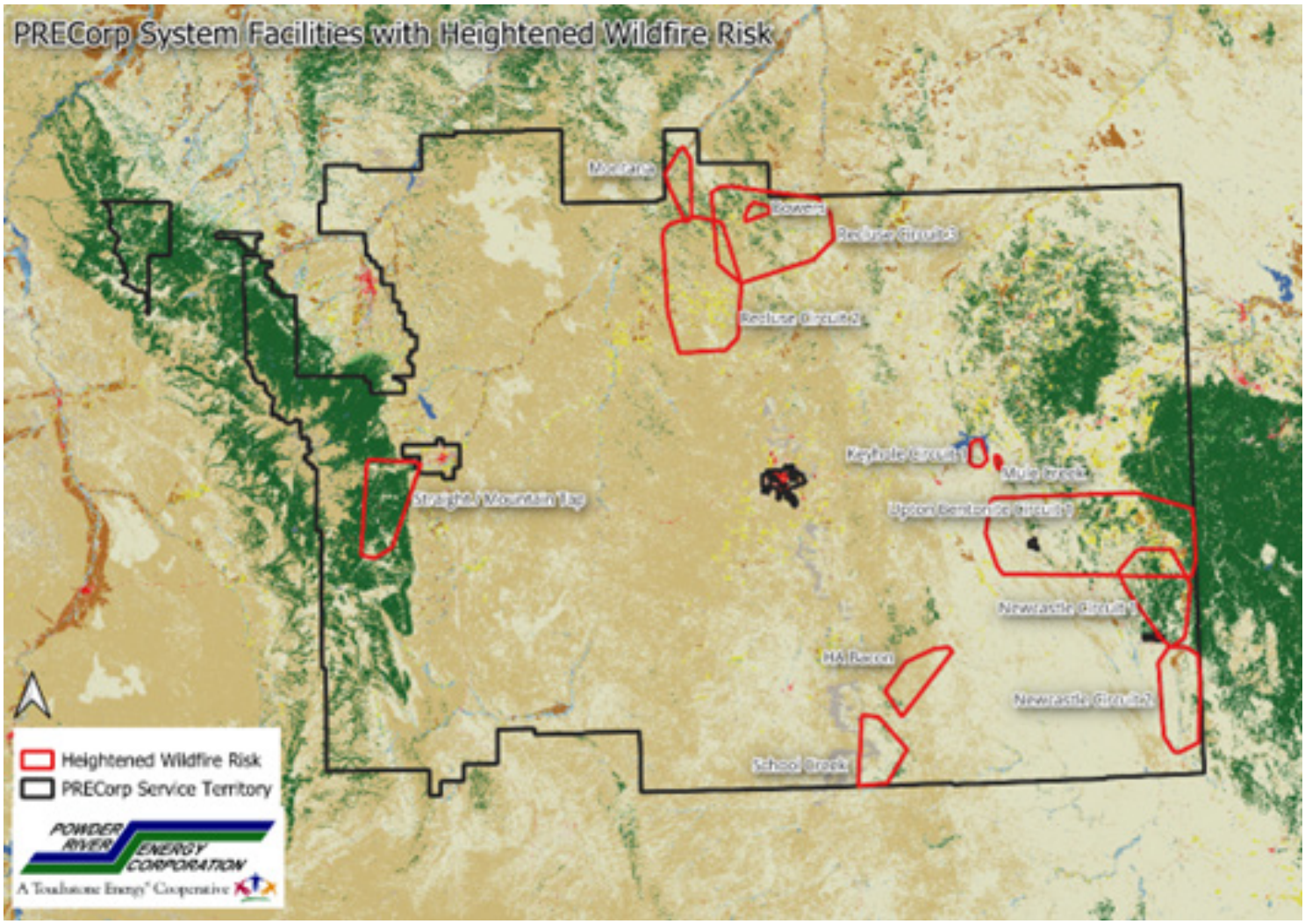

Figure 4. System Facilities with heightened wildfire risk

The overhead distribution circuits (or line sections) in areas with heightened wildfire risk are given additional consideration when applying the three-tiered wildfire mitigation activities. This risk assessment may be revised periodically, and the list of facilities in may change as warranted.

4. Asset Management

Asset management (inspection and maintenance) is an important aspect of PRECorp's business, benefiting PRECorp's membership by improving public safety, extending asset life, and reducing power outages. Because faulted power lines can ignite wildfires, reducing the number of faults through proactive maintenance is a cornerstone of PRECorp's wildfire prevention strategy.

A. System Inspection and Maintenance (Repair)

PRECorp implemented a rigorous system-wide Electrical System Maintenance Plan in 2018. In addition to causing power outages, faulted power lines can ignite wildfires by contributing heat energy and fuel (burning materials) to local fuels (grass, brush, wood). Reducing the number of faults through proactive maintenance reduces wildfire ignition risk. Pole and equipment failure is a leading contributor to wildfire ignitions involving PRECorp's overhead distribution system. System maintenance can identify and address deficiencies before power line equipment (poles, line hardware, and electrical connections) fail.

PRECorp's Electrical System Maintenance Plan follows a systematic, geographically based approach designed to inspect PRECorp's entire system on regular cycles. This structured maintenance approach has measurably improved system reliability and reduced wildfire ignition risk.

B. System Inspection Cycles and Methodology

PRECorp's maintenance plan employs a multi-tiered inspection approach:

1. Twelve-Year Pole Inspection and Testing Program – Each of the eight PRECorp lineman service areas are divided into twelve geographical inspection areas based on circuit geometry, terrain, and other factors. Each year, approximately one-twelfth of PRECorp's system (approximately 16,000 poles) receives detailed inspection and testing. This inspection includes:

- Visual assessment of above-ground pole conditions
- Below-ground testing for internal and external decay using IML Resistograph equipment for poles older than 15 years that are planned to be in operation prior to the next cycle
- Infrared (thermal) inspection of electrical connections
- Assessment of wildlife protection measures
- Documentation of joint-use attachments

2. Three-Year Line Patrol Cycle - In addition to the detailed pole inspection program, PRECorp conducts less-detailed visual line patrols on three line-inspection areas each year. This ensures that all overhead distribution infrastructure is visually assessed at least once every three years when combined with the pole inspection process. Line patrols focus on identifying:

- Obvious equipment deficiencies
- Vegetation clearance issues
- Electrical clearance concerns
- Joint attachment (phone, cable, TV utility) issues

3. Transmission Line Inspection - PRECorp's high-voltage distribution (69kV) and transmission (230kV) lines are visually inspected annually, usually via helicopter, and follow the same twelve-year detailed inspection cycle as PRECorp's distribution system.

C. Aerial Inspection (UAS)

In 2024, PRECorp successfully completed a comprehensive, three-year Unmanned Aerial System (UAS) inspection program, which evaluated over 190,000 power poles. This inspection encompassed both transmission and distribution assets, significantly enhancing PRECorp's traditional distribution ground line inspections and aerial transmission line assessments typically conducted via helicopter.

The findings from the UAS program were prioritized based on the severity of identified issues, and corrective actions were implemented in accordance with this prioritization. Consultants meticulously reviewed each pole location for defects, and any deficiencies identified were subsequently assessed internally by PRECorp's Engineering staff to determine the most appropriate course of action.

Actional findings included immediate repairs for 66 pole locations, and over 5,000 poles were found to have high priority issues. Additionally, there were 19,000 locations that require attention due to lower priority concerns. PRECorp is addressing these lower priority concerns on normal maintenance schedules.

PRECorp continues to evaluate the UAS inspection program and has not yet determined an optimal UAS inspection cycle. In 2025 and 2026, PRECorp will inspect a subset of distribution poles via UAS to help identify an optimal UAS inspection cycle.

PRECorp's high-voltage distribution (69kV) and transmission (230kV) lines receive annual aerial inspections via helicopter.

D. Maintenance Plan Repair and Prioritization

Conditions identified during inspections are categorized based on their potential to cause a fault event and risk of wildfire ignition:

- Critical Conditions ("P10 UAS") - Issues posing imminent danger or likely to cause a fault are addressed immediately.
- Moderate Risk Conditions ("P20" UAS) – Issues that may be addressed within three months.
- Priority A Rejects - Poles with severe structural deterioration are replaced within 90 days.
- Priority B Rejects - Poles with moderate deterioration are scheduled for repair or replacement by the end of the year following identification.
- Other Maintenance Items ("P30" and "P40" UAS) - Non-critical issues are scheduled for repair during normal maintenance cycles.

The structured approach to system inspection and maintenance mitigates wildfire risk by proactively identifying and addressing conditions that could lead to equipment failures.

E. Vegetation Management

Vegetation contributes to wildfire risk in two ways. (1) Faults may occur when vegetation, usually trees and branches contact overhead power lines. Historically, this has been a rare ignition source on PRECorp's system. (2) When an ignition does occur, the quantity, type, and condition of vegetation in the immediate vicinity of the power line can contribute to the spread and intensity of fire. Vegetation management addresses both of these factors.

In 2022, PRECorp began a five-year program obtaining baseline data to implement an intelligent vegetation management system (IVMS). IVMS utilizes sophisticated satellite imagery to measure vegetation encroachment and identify potential hazard trees. In 2025 about 2,400 miles of line will be scanned using satellite imagery. The IVMS system is used to direct PRECorp's right-of-way clearing\maintenance (vegetation management) activities and has resulted in budget increases for vegetation management in 2024 and 2025 compared to previous years.

Vegetation management activities (trimming, clearing, and danger tree removal) are performed according to the conditions of PRECorp's permit or easement and in coordination with landowners (or public land management agency) as required.

5. System Hardening

PRECorp is investing in system improvements to reduce wildfire ignition risk. These improvements should also improve PRECorp's reliability. PRECorp's key system hardening activities are described below.

A. Construction Work Plans and Engineering Standards

System hardening and other capital construction projects are planned and administered through PRECorp's Long Range Plan, Construction Work Plan, and Annual Capital Budget. These projects are then constructed according to PRECorp's engineering standards. Project plans and engineering standards are developed considering many factors including economics, system performance impacts, budget constraints, reliability, safety, regulatory requirements and impacts to electric rates.

B. System Protection

Electric utilities use a complex network of system protective devices (fuses and circuit breakers) to de-energize faulted and overloaded electrical facilities. PRECorp has established a multi-year capital improvement program to upgrade and add protective devices across PRECorp's overhead distribution network. This includes replacing mechanical devices (fuses and oil-filled reclosers) with electronically controlled devices when feasible. Electronic devices are more precisely controlled than mechanical alternatives and are more easily integrated into remote-controlled networks.

System protection improvements are expected to reduce wildfire ignition risk by reducing fault-energy (heat) that is available to ignite fuels (grass, brush, trees) located near a faulted powerline. System protection improvements will improve reliability in two ways. (1) The length of line protected by any one device (fuse or circuit breaker) will be reduced. Shorter protected line segments can mean fewer customers are off during a power outage and personnel have a smaller line footprint to patrol in search of an underlying problem. (2) The network of protection devices (fuses and circuit breakers) will also work better together. This is known as device "coordination" and improvements in coordination lead to improved system reliability.

A. SCADA (Remote Control)

Electric utilities use SCADA (supervisory control, alarm, and data acquisition) to remotely control and monitor the electric network. PRECorp's existing SCADA system is capable of monitoring and controlling major system equipment in PRECorp's substations. PRECorp has invested in an extensive communications network and will leverage those investments to establish remote control capabilities across the distribution network. SCADA expansion to distribution network devices will improve the efficiency and effectiveness of PRECorp's wildfire operation response.

B. Wildlife Mitigation - APP Historical Development

Wildlife interactions with PRECorp's overhead power line equipment are a significant ignition source. PRECorp has a robust history of addressing wildlife-related outages through PRECorp's Avian Protection Plan (APP), which has evolved significantly since its inception.

PRECorp began collecting and reporting avian mortality data as early as 2001 and adopted its first voluntary Avian Protection Plan in 2005. The APP was subsequently updated in 2010 to incorporate lessons learned and to refine processes based on mortality data. This proactive approach positioned PRECorp among the early adopters of comprehensive wildlife protection strategies in the cooperative utility sector.

The APP was developed following the guidelines established by the U.S. Fish and Wildlife Service and the Avian Power Line Interaction Committee (APLIC), addressing three key motivations:

- Regulatory compliance with laws protecting birds
- Improved system reliability
- Enhanced community relations

C. APP Effectiveness and Evolution

PRECorp's APP has demonstrated significant effectiveness in reducing wildlife-related outages. Data analysis has shown a consistent downward trend in animal-caused outages since implementation, particularly for bird-related incidents. Transformer structures, which were identified as the most problematic infrastructure component for avian interactions, have been systematically addressed through PRECorp's retrofitting program.

The effectiveness of PRECorp's wildlife protection efforts is continuously monitored through:

- Tracking of wildlife-related outages
- Documentation of avian mortalities
- Post-retrofitting audits to evaluate equipment performance

Based on field experience and performance data, PRECorp has continuously refined its approach to wildlife protection, including:

- Reviews and pilots of new technologies and equipment
- Upgraded designs for bushing covers
- Improved insulation practices for jumper wires
- Enhanced perch deterrents in sage grouse habitat areas
- Modified grounding practices to prevent phase-to-ground contacts

D. Hand-Wheel Bushing Cover Remediation Program

A significant component of PRECorp's wildlife mitigation effort involves the systematic removal of hand-wheel bushing covers from PRECorp's system. Through data analysis conducted as part of PRECorp's WFRMP, PRECorp identified transformer bushing covers as a risk for wildlife interactions that could be mitigated proactively.

Field inspections revealed that insects shelter under these covers, attracting small birds that attempt to access the insects as a food source. This creates a potential phase-to-ground contact point that can result in equipment failure, outages, and potential ignition sources.

PRECorp has integrated the identification and replacement of hand-wheel bushing covers into PRECorp's twelve-year pole inspection program. During detailed line inspections, transformer bushings are reviewed for their type and condition. Hand-wheel bushing covers are documented for replacement with improved alternatives.

This methodical approach ensures complete system remediation over a twelve-year cycle while optimizing operational efficiency by aligning the work with PRECorp's established inspection program. As of 2025, approximately 25% of identified hand-wheel bushing covers have been replaced, with replacement completion anticipated by 2036.

The APP continues to evolve as new materials, technologies, and wildlife protection strategies emerge, reinforcing PRECorp's commitment to reducing wildfire ignition risks while improving overall system reliability.

E. Electrical Connectors

Electrical connectors can be an ignition source if compromised by corrosion or loosening. When a compromised connection is subjected to high levels of current, often during electrical fault conditions, arcing can occur. PRECorp has embarked on three programs to address this potential ignition source, as summarized below.

Engineering Standards - PRECorp is revising its standards for various connector types to ensure the material and connection type are optimal for each installation condition. Replacement of existing connectors will take place in coordination with other work over a twelve-year period.

Infrared Imaging – UAS inspection included infrared (heat) imaging of suspect electrical connections. PRECorp technicians also use infrared imaging as part of the line inspection process. Infrared imaging can help identify a compromised electrical connection, however there are numerous factors that impact the effectiveness of this inspection method, and historically results have been mixed.

"Anometer" Diagnostics - "Anometer", short for Anomaly Meter, is a software system that detects compromised electrical connections by leveraging PRECorp's Automated Metering Infrastructure (AMI) data. On a daily basis, Anometer evaluates voltage and power quality data that is reported by PRECorp's 27,000 meters. Anomalies are grouped geographically, and suspected faulty electrical connection points are identified. Power technicians are then dispatched to the suspect connection points for field evaluation and possible repair.

Anometer was developed and continues to be refined by PRECorp's staff. The system has been featured at multiple electric utility conferences and was recognized by the HeroX crowdsourcing platform.

F. Evaluation and Potential Implementation of Other System Hardening Activities

PRECorp is exploring a systematic approach to hardening the overhead distribution system. This type of hardening involves engineering analysis (modeling) of existing powerlines to optimize infrastructure improvements. For example, an analysis may recommend improving a line's physical strength by adding guys and anchors or replacing selected poles with stronger ones. Limited pilot modeling studies have been completed on select sections of PRECorp's overhead distribution line.

PRECorp continues to evaluate protective coatings and pole wraps that improve the fire resistance of wood poles. In a typical year, PRECorp will replace approximately twenty wood poles while 2024 was an exceptional year, with over 400 poles requiring replacement due to wildfire damage. PRECorp has not yet determined an optimal\economic case for widespread use of these protective coatings and wraps.

6. Operational Response

PRECorp alters normal operations when weather conditions indicate a heightened risk for wildfire ignition and wildfire escalation. PRECorp maintains detailed operational response standard operating and utilizes the following sources for quantifying fire weather impacts.

1. The National Weather Service (NWS\NOAA) with special attention given to red-flag warnings
2. Input from wildfire related agencies

PRECorp recognizes the critical role weather forecasting plays in system operations, engineering, and wildfire operational response. In order to improve the weather information available to PRECorp, in 2020 PRECorp partnered with "Tempest\Weatherflow" to install weather stations at most PRECorp substations. The network of weather stations in the PRECorp service territory has been further expanded by PRECorp members participating in a PRECorp program to provide the Tempest weather stations at a reduced cost.

A. Wildfire Season

The fire season is the season of elevated fire risk, often from mid-summer to early fall. The wildfire season is established (and ended) each year according to the judgement of PRECorp's VP of System Operations based on factors that indicate fire risk (due to weather) is elevated and is expected to remain elevated for an extended period.

During the wildfire season, PRECorp implements the following two operational measures according to SOPs:

1. Additional powerline patrols and precautions are taken before and after re-energizing faulted powerlines. When a power outage occurs, power may stay out longer while PRECorp personnel verify a wildfire ignition hazard does not exist prior to restoring electric service.

2. Fire protective settings (FPS) are implemented for protective equipment (circuit breakers) in areas with heightened wildfire risk (identified in section 3). Fire protective settings are more sensitive than normal and reduce fault current energy (heat). Fire protective settings reduce ignition risk; however more frequent and longer power outages may occur when fire protective settings are implemented.

B. Red Flag Days (Fire Weather)

During red flag warnings issued by the NWS, PRECorp implements additional operational measures according to detailed SOPs. Red Flag Warnings

usually occur during the wildfire season, but they can occur at any time. During red flag warnings, the following two precautions are taken in addition to those listed under the wildfire season paragraph.

1. Off-road travel and off-road field operations are reduced according to the judgement of field personnel.
2. Fire protective settings are implemented for overhead distribution powerline located in an NWS fire weather zone under a red flag warning. PRECorp monitors fire weather forecasting and evaluates other operational considerations when implementing wildfire protective settings. As conditions warrant PRECorp may enter into fire weather protected settings in advance of a red flag warning and remain in fire weather protective settings after a red flag warning has been lifted.

C. Fire Incident Response

PRECorp responds to wildfire incidents in the same manner as other emergent system operating conditions, such as power outages. PRECorp, together with PRECorp's industry partners (contractors, suppliers, etc.) has vast experience successfully responding to significant system disruptions and safely restoring electric service in an efficient manner. For example, in 2024, significant wildfires such as the Constitution, Flat Rock and House Draw wildfires consumed over 300,000 acres and 400 PRECorp poles. Over twenty miles of powerline were rebuilt, and power was restored to most customers in less than three days.

During wildland fires, PRECorp personnel, with assistance from PRECorp's system dispatch center, communicate with wildland fire incident managers. Fire incident managers direct PRECorp personnel to safely access PRECorp's facilities. Fire incident managers may request PRECorp to de-energize (lock out) distribution facilities in the vicinity of working fire crews and PRECorp employees are authorized to respond to such requests.

7. Proactive Power Shutoff

PRECorp has historically de-energized services and line sections when needed to provide public safety, usually at the request of community first responders (EMS) during accidents, fires, floods and other emergency situations. This includes de-energization of powerlines for the safety of wildland firefighters working in the vicinity of PRECorp's system. PRECorp's employees are empowered to de-energize (and lock, tag, and ground) line segments in these situations. These practices are in place for active fires encroaching on existing infrastructure and other potential public safety hazards.

Proactive de-energization of electric facilities, where a powerline is de-energized in anticipation of a fire or another emergent hazard exists, is known as a Public Safety Power Shutoff (PSPS). A PSPS is a temporary, last resort measure taken to reduce wildfire ignition potential during periods of high wind speeds, low humidity, and the presence of abundant severely dry fuels. PRECorp may implement a PSPS during periods of critical wildfire risk either at PRECorp's discretion or at the request of a fire response agency(s) or community leadership.

PRECorp's Emergency Response Team (ERT) team will evaluate any PSPS requests (internal or external to PRECorp) and implement the PSPS if warranted and practical to do so. The event will be managed according to PRECorp's internal ERT procedures for various disaster and major hazard response. Prior to implementing a PSPS the ERT team will complete the following steps.

1. Fully define and clarify the PSPS request (impacted areas, duration, location(s), lock-out/tag-out and grounding requirements)
2. Determine if the PSPS area can be safely sectionalized (de-energized and electrically isolated) without impacts to areas outside the PSPS area.
3. Identify impacts to critical infrastructure (communications, water, EMS, hospitals, etc.).
4. Determine a re-energization plan and re-energization criteria.
5. Determine if the area considered for PSPS can be safely re-energized without impacts to areas outside the PSPS area.
6. Attempt to notify impacted members (customers) and stakeholders through manual and\or automated means.

8. Coordination with Wildfire Response Agencies

A draft of this plan has been provided to wildland fire response agencies including county fire departments, the Wyoming Department of Natural Resources (DNR), the US Forest Service (USFS), and the Bureau of Land Management (BLM). Agency comments have been considered in preparing the final version of the plan.

Beginning in 2022, PRECorp has communicated with fire response agencies at least annually in order to (1) maintain current agency contact information, (2) improve incident communications (between PRECorp and the agency), (3) obtain wildland fire event data, (4) stay informed of partnership opportunities to lower wildland fire hazard risk, such as fuel management or vegetation management grants and programs; and (5) to offer wildfire response agencies electrical safety training and resources.

9. Public Communication

PRECorp engages with its members and communities to raise awareness of wildfire risks, utility safety, and to encourage the public to notify PRECorp when they become aware of wildfire hazards such as vegetation clearance issues.

Communication regarding wildfire and wildfire risk mitigation has been incorporated into PRECorp's broader communication plans. PRECorp utilizes multiple lines of communication to reach PRECorp's audiences including social media, the "Power Lines" newsletter (power bill insert), the Wyoming Rural Electric News (WREN) magazine, town hall call-in meetings, and traditional media advertisements.

10. WFRMP Implementation, Financial Considerations, and Annual Reporting

A. Implementation

This plan was prepared by PRECorp's staff. PRECorp's VP of Operations and VP of Engineering and Technical Services are together responsible for developing, updating, and implementing the WFRMP.

A PRECorp stake holders group meets regularly to review and update fire incident data, suggest plan revisions, measure progress in meeting mitigation goals, and prepare fire mitigation related workplans and budgets.

B. Wildfire Prevention Financial Considerations

The initiatives outlined in this WFRMP necessitate a substantial investment. However, the efficiencies derived from these programs will alleviate rate pressures on members. The projected annual implementation costs for the various programs include both capital and operational expenditures, as detailed in the table below.

WFRMP Investment Forecast

Program Component	2025	2026	2027	2028
Aerial (drone) Inspections	$ 50,000	$ 150,000	$ 105,000	$ 90,000
IVMS Data Collection	$ 140,000	$ 60,000	$ 150,000	$ 60,000
Vegetation Management (trimming associated with WFRMP)	$ 250,000	$ 275,000	$ 300,000	$ 325,000
Sub Total Asset Management	*$ 440,000*	*$ 485,000*	*$ 555,000*	*$ 475,000*
Engineering and Design	$ 40,000	$ 100,000	$ 75,000	$ 60,000
Equipment\Material Replacement	$ 1,165,000	$ 1,695,000	$ 1,548,482	$ 2,014,587
System Protection Improvements	$ 880,000	$ 1,020,000	$ 910,000	$ 870,000
Sub Total System Hardening	*$ 2,085,000*	*$ 2,815,000*	*$ 2,533,482*	*$ 2,944,587*
Total (Asset Management, System Hardening)	**$ 2,525,000**	**$ 3,300,000**	**$ 3,088,482**	**$ 3,419,587**

** Additional labor costs for operational support for additional outage response and protective equipment settings estimated at $300k\yr*

Figure 5. WFRMP Investment Forecast

Fluctuations in these expenditures are expected as the program progresses. These costs include project scoping and design as well as construction. Where possible, PRECorp's internal crews will complete field work, while contractors are engaged when workload necessitates external support.

PRECorp has aligned wildfire prevention with PRECorp's strategic vision. The majority of PRECorp's past and planned wildfire mitigation expenditures are investments in the cooperative to provide value to the membership. Asset management and system hardening expenses are expected to reduce outage frequency and duration, reduce outage response expense, and extend asset life. Operational response expenses may not have a corresponding return, however PRECorp is working to reduce operational response expenses through investment in communication and remote control of protective devices.

C. Wildfire Liability Financial Considerations

The liability associated with wildfire could have an adverse effect on electric rates. Wyoming HB0192 is intended to limit this liability and improve the insurability of electric utilities.

PRECorp is insured by and is a member of the Federated Rural Electric Insurance Exchange (Federated), a cooperative serving electric cooperatives. For the time being, PRECorp has obtained adequate wildfire risk insurance from Federated without substantial insurance rate increases. This insurance is expected to be sufficient to pay for damages associated with a PRECorp ignited wildfire.

Insurance is not available to cover the loss of PRECorp infrastructure to wildfires. In most years, PRECorp's wildfire losses have been relatively modest. In 2024, PRECorp incurred significant losses, however those costs are expected to be offset by the Federal Emergency Management Administration (FEMA).

D. Annual Reporting

Beginning in 2026, PRECorp will file an annual report to the PSC before June 1 of each year detailing PRECorp's compliance with WFRMP.

11. Contact for Further Information

- Tim Velder
  Marketing Communications Specialist
  timv@precorp.coop
- Quentin Rogers
  VP of Engineering and Technical Services
  quentinr@precorp.coop
- Rich Halloran
  VP of System Operations
  richh@precorp.coop

POWDER RIVER ENERGY CORPORATION

A Touchstone Energy® Cooperative

SUNDANCE – CORPORATE HEADQUARTERS
221 Main Street • P.O. Box 930 • Sundance, WY 82729
(800) 442-3630 Phone

GILLETTE
200 S. Garner Lake Road • Gillette, WY 82718
(800) 442-3630 Phone

SHERIDAN
1095 E. Brundage Lane • Sheridan, WY 82801
(800) 442-3630 Phone

MEMBER SERVICE:

1-800-442-3630

9 a.m. - Noon; 1 p.m. – 5 p.m. (Monday–Friday)

POWER OUT?

1-888-391-6220

24 hours/day

Powder River Energy Corporation is an equal opportunity provider and employer.