WILDFIRE MITIGATION PLAN

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1 Overview

In 2021, the State of Oregon enacted Senate Bill 762 (SB 762), which requires electric utilities, including consumer-owned utilities (COUs), to develop and maintain a risk-based wildfire mitigation plan. These plans are intended to guide electric utilities in establishing operational practices to prevent, prepare for, and respond to wildfire events, while protecting public safety and enhancing system resilience. Wildfire mitigation plans are reviewed and updated on a regular basis and are approved by the electric utility's governing body in accordance with Oregon Revised Statute (ORS) 757.966.

Wildfire mitigation is integrated into the Wasco Electric Cooperative's (WEC) operational practices. Existing policies, programs, and procedures are designed to directly or indirectly reduce wildfire risk across the system. Over time, WEC has implemented additional mitigation measures in response to changing environmental conditions, advances in technology, and evolving industry standards, all of which support improved prevention of wildfire ignitions and more effective response during periods of elevated fire risk.

2 Purposes and Objectives

The purpose of this Wildfire Mitigation Plan (WMP) is to document WEC's strategies and programs to reduce the risk of wildfire ignition associated with electric utility infrastructure, while supporting safe, reliable, and resilient electric service. The plan reflects the unique characteristics of WEC's service territory, including topography, weather patterns, vegetation, system configuration, and areas of elevated wildfire risk.

The primary objective of this WMP is to implement a risk-based framework to enhance system reliability and safety while minimizing the likelihood that WEC assets contribute to wildfire ignition. WEC's wildfire mitigation programs are designed to align with applicable regulatory requirements and industry standards and are continually evaluated to incorporate emerging technologies and best practices that improve system performance and reduce outage frequency and duration.

WEC evaluates the effectiveness of its wildfire mitigation strategies through periodic review of programs and outcomes. WEC has implemented a range of measures to address wildfire risk through its operations, maintenance, and engineering activities.

This WMP is designed to meet applicable requirements of ORS 757.966 and Oregon Administrative Rules (OAR) 860-024 and supports compliance with inspection, maintenance, and vegetation management standards. Final decision authority for operational actions during periods of elevated fire risk resides with the General Manager or designee, based on recommendations from engineering and operations staff.

3 Governance and Accountability Framework

WEC establishes a formal governance structure for implementation and oversight of this WMP:

- Board of Directors – Provides oversight and approves the WMP, including updates
- General Manager – Ensures compliance and resource allocation
- Manager of Engineering – Oversees program execution and performance
- General Foreman – Directs field implementation and corrective actions

The General Manager is responsible for ensuring that the WMP is implemented in accordance with all applicable regulatory requirements, that sufficient resources are allocated to support wildfire mitigation activities, and that authority for key operational decisions is established within this plan. Such authority may be exercised by the General Manager or formally delegated to qualified personnel as appropriate.

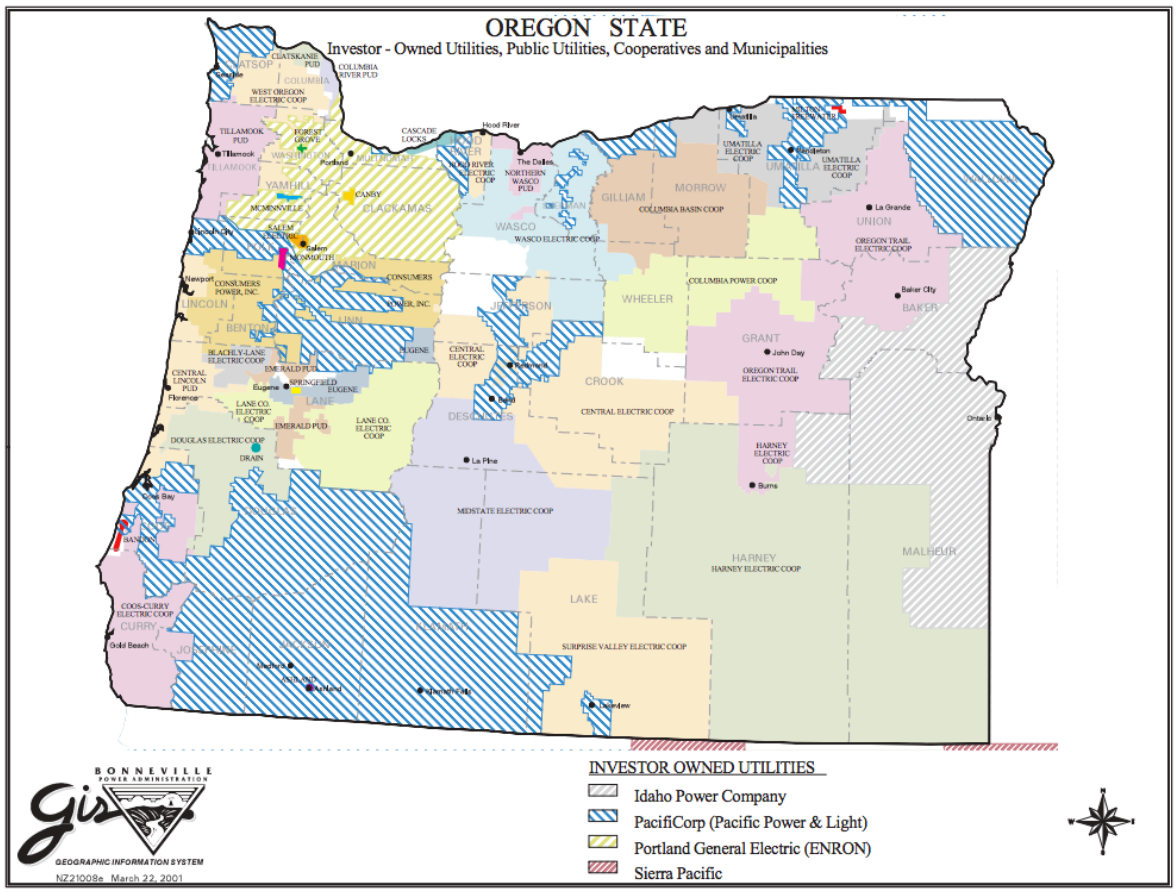
4 WEC Profile and History

WEC is a not-for-profit, member-owned corporation founded in 1940, with the mission to provide members with cost effective electricity. The Board of Directors desires to fulfill this mission with safety, service, and reliability in mind.

As an electric cooperative, WEC is governed by a nine-member Board of Directors. The Board of Directors determines policy and appoints the General Manager, who is responsible for WEC's overall management and operations.

5 WEC Service Area

Located in North Central Oregon, Wasco Electric Cooperative (WEC) is headquartered in The Dalles (Figure 1). WEC operates additional warehouse facilities in Maupin, Grass Valley, and on Pomona Street in The Dalles. WEC serves a largely rural 5,000-square-mile territory encompassing most of Wasco and Sherman Counties, as well as portions of Jefferson, Gilliam, and Wheeler Counties (Figure 2).



[1]

Figure 1. WEC Service Territory in Oregon

WEC's service territory lies within the Columbia River Gorge transition zone, extending from the forested eastern slopes of the Cascade Range to the John Day River, and approximately 80 miles south from the Columbia River into Jefferson County. The area spans four ecoregions: the Cascades, East Cascades Slopes and Foothills, Columbia Plateau, and portions of the Blue Mountains.

[1] https://www.sightline.org/wp-content/uploads/2015/04/Map-of-Oregon-Utilties-service-territory.png

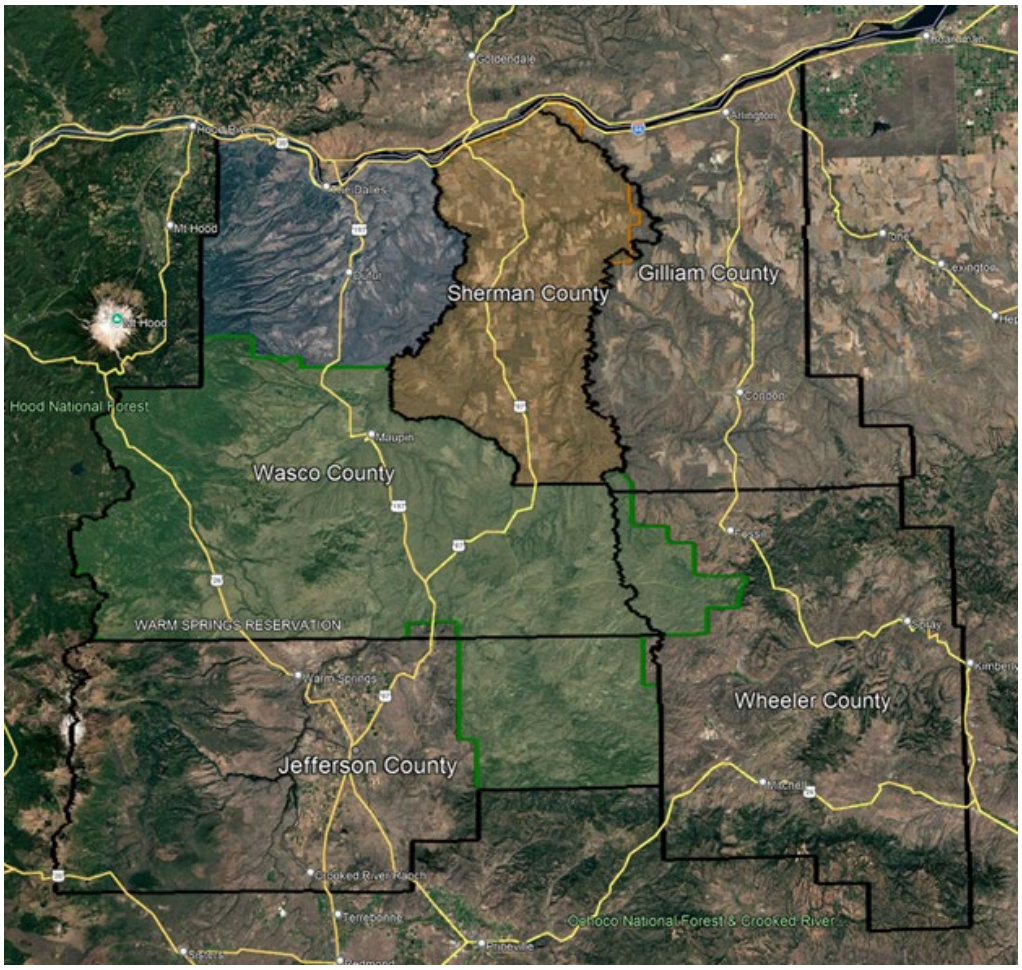


Figure 2. WEC Service Territory and County Lines

6 Utility Assets

Power is provided to WEC members by way of bulk substations, overhead sub-transmission lines, and overhead and underground distribution line assets. Table 1 provides a summary of WEC's transmission and distribution (T&D) assets.

Table 1. WEC Utility Assets

ASSET CLASSIFICATION	ASSET DESCRIPTION
Transmission Line Assets	Approximately 87 miles of conductor, sub-transmission structures, and switches at 69 and 115 kV.
Distribution Line Assets	Approximately 1,494 miles of overhead (OH) conductor, cabling, transformers, voltage regulators, capacitors, switches, and line protective devices operating at 12.5/7.2 kV. Approximately 127 miles of underground (UG) conductor, cabling, transformers, voltage regulators, switches, and line protective devices operating at or below 12.5/7.2 kV

Substation Assets	Major equipment such as power transformers, voltage regulators, capacitors, reclosers, relays, open-air structures, switchgear, and control houses in 10 substation facilities.

7 Wildfire Prevention Strategy and Programs

WEC has implemented a range of measures to address wildfire risk through its existing operations, maintenance, and engineering programs. This WMP documents those established practices and identifies additional strategies to further mitigate wildfire risk.

Many of these programs are ongoing and multi-year in nature, with implementation timelines varying based on system needs and program maturity. Certain mitigation measures are condition-based and implemented in response to real-time factors, including weather and fuel conditions. Emergency preparedness, response, restoration, and member support activities are similarly event-driven and not tied to fixed timeframes.

WEC routinely evaluates these programs and adapts its practices as conditions evolve, incorporating improvements to support effective and continuous wildfire risk reduction. Table 2 summarizes WEC's key mitigation components and associated programs that support its continued commitment to wildfire risk reduction.

Table 2. Mitigation Strategies and Activities

DESIGN AND CONSTRUCTION
• Strategic undergrounding of distribution lines • Field recloser to vacuum-type breaker change out program • Increased phase spacing reduces phase to phase contact • Covered jumpers and animal guards • Reduced span length in high wind areas • Avian protection construction guidelines
INSPECTION AND MAINTENANCE
• Infrared inspections of substation equipment • Unmanned aerial vehicle for transmission and distribution line inspections • Infrared and LiDAR inspection program • Wood pole intrusive inspection and testing • Enhanced transmission and distribution vegetation right-of-way maintenance • Transmission and distribution system line patrols and detailed inspections • Transmission and distribution system vegetation management program • Removal of hazard trees in power line right-of-way
OPERATIONAL PRACTICES
• Community outreach/wildfire safety awareness • Work procedures and training for work within locations with elevated fire risk condition locations • Liaise with county offices of emergency services during fire events • Fire suppression equipment on worksite during fire season

- Contractor/staff safety training and orientation for transmission and distribution vegetation management work
- Alternate recloser practices during fire weather

SITUATIONAL AWARENESS

- Weather monitoring in the service area
- Monitoring active fires in the region

RESPONSE AND RECOVERY

- Coordination with local agencies as applicable
- Line patrols on power lines opened by system protective devices before re-energization

8 Continuous Improvement, Monitoring, and Governance

8.1 A Continuous Improvement Approach

WEC prioritizes the safe and reliable operation of its electric system in service to its members. Each year, capital improvements are developed to replace aging infrastructure and enhance system reliability. WEC has long incorporated wildfire mitigation practices into its operations, maintenance, and engineering activities, which this WMP formalizes into a coordinated framework. Through ongoing evaluation and refinement, WEC continues to strengthen its wildfire risk reduction efforts and adapt to evolving environmental conditions, operational needs, and industry best practices.

The WMP will be included as a discussion item on the agenda of regularly scheduled management meetings. WEC monitors the WMP and reports on its effectiveness to the Board of Directors on an annual basis. The staff updates leadership with recommendations or proposed actions to enhance the WMP's objectives and strategies over time.

WEC employs an adaptive management approach:

- Post-fire season review conducted annually
- Root cause analysis performed for ignition events
- Lessons learned incorporated into future plan updates

WEC will review this WMP annually and present updates to the Board of Directors for approval. WEC maintains updated versions of the WMP and provides them as required by Oregon regulations.

8.2 Financial Considerations

8.2.1 Prioritization Framework

WEC prioritizes wildfire mitigation investments using a risk-based framework that evaluates the cost of mitigation activities relative to the corresponding reduction in wildfire risk. Investments are assessed based on their ability to reduce the likelihood and potential consequences of ignition events, particularly in areas of elevated wildfire risk. Higher risk locations receive priority consideration for resource allocation, including enhanced inspection frequency, vegetation management, system hardening, and protective system improvements.

8.2.2 Budget Integration and Planning

WEC incorporates wildfire mitigation needs into its annual budgeting process and long-term capital planning to ensure resources are deployed in a prudent and cost-effective manner consistent with

WEC's obligation to provide safe and reliable electric service. This approach supports continuous improvement by aligning investment decisions with evolving system conditions, wildfire risk factors, and operational experience.

9 Understanding and Assessing Wildfire Risks

Wildfire risk within WEC's service territory is influenced by a combination of environmental conditions, fuel characteristics, infrastructure factors, and the presence of communities within the wildland-urban interface (WUI). To better understand these risks, WEC applies a structured, risk-based approach that evaluates the likelihood of ignition and potential impacts to people, property, and critical infrastructure. This assessment informs prioritization of mitigation activities and supports targeted risk reduction across the system.

Regional fire history indicates that large wildfires are most prevalent in areas with continuous, highly ignitable fuels, such as grasses and shrubs, particularly during late summer when conditions are most conducive to fire spread. Land management practices and development patterns have contributed to increased fuel loading in some areas, elevating the potential for higher intensity wildfire events.

9.1 Fire Threat Assessment in WEC Service Territory

Oregon has not adopted a single statewide wildfire risk map specific to electric utility facilities. To meet the intent of SB 762, WEC utilizes available proxy datasets, including wildfire hazard potential (WHP), WUI mapping, fire history, vegetation/fuels data, topography, and weather patterns.

Outputs from this risk assessment process are used to prioritize inspection frequency, vegetation management activities, system hardening investments, and operational practices during elevated fire danger conditions.

As part of the risk analysis process, WEC examined its asset locations to identify risks unique to its service area. This section provides an overview of the service area properties and associated risks which are factored in the wildfire mitigation strategy.

9.2 Evaluation of Higher Risk Areas

Certain circuits are designated as higher risk based on load demand, wildfire history, vegetation and fuel conditions, topography, and accessibility. These areas are prioritized for inspection, maintenance, and vegetation management regardless of their location within mapped risk zones.
Visual inspections in these areas focus on:

- Vegetation clearance
- Structure condition
- Identification and prioritization of deficiencies

Seven Mile: This area serves high-demand residential loads within a WUI intermix setting. The system traverses large, difficult-to-access terrain, limiting inspection and maintenance access. Vegetation consists primarily of scrub brush and oak, with mixed conifer and deciduous trees. This area is classified as a Very High wildfire risk tier.

Dufur: Circuits from the Pine Hollow substation serve irrigated and dryland agricultural areas across steep, undeveloped terrain, with limited vehicle access. The system also supports wildland development areas and is located within High and Very High wildfire risk tiers.

Pine Hollow: This higher-density WUI intermix area includes a mix of rangeland fuels, oak, and conifer vegetation, transitioning to forested conditions, classified within a Very High wildfire risk tier.

9.3 Fire Risk Drivers Related to WEC's Service Territory

WEC has identified the following fire risk drivers within the service territory:

- Topography
- Accessibility
- Droughts
- Lightning
- Vegetation: Types & Fuels
- Fire History
- Tree Mortality
- High Winds

9.4 Key Risk Impacts

The aforementioned risks have many possible outcomes. The list below outlines some of the worst-case scenarios and consequences:

- Personal injuries or fatalities to the public, employees, and contractors
- Damage to public and/or private property
- Damage and loss of WEC owned infrastructures and assets
- Impacts on reliability and operations
- Damage claims and litigation costs, as well as fines from governing bodies
- Damage to WEC's reputation and loss of public confidence

10 Vegetation Management

WEC personnel and contractors conduct ground-based inspections to identify tree hazards, vegetation encroachments, and conductor clearance issues. During routine maintenance, crews address vegetation concerns and remove high-risk fuel sources as needed. WEC refers unresolved issues to vegetation management contractors for priority trimming. WEC implements its vegetation management activities in accordance with its Right of Way Clearing Policy.

Vegetation management practices comply with OAR 860-024 requirements, ensuring minimum clearances to protect public and workers' safety, maintain system reliability, and reduce wildfire risk. Activities may be modified or restricted during elevated fire danger conditions, including compliance with Industrial Fire Precaution Levels (IFPLs) and Red Flag Warnings (RFW). Inspections and treatments are prioritized in higher-risk corridors identified through WEC's wildfire risk assessment.

WEC recognizes that maintaining proper vegetation clearance is essential for safe and reliable system operations. WEC maintains clearance near overhead distribution and transmission lines to enhance safety, minimize outages, and ensure access for operations. Vegetation management is performed on

a cost-effective maintenance cycle consistent with Oregon Public Utility Commission (OPUC), Rural Utilities Service (RUS), and WEC's standards, following industry best practices for tree care, pruning, and safety.

WEC's vegetation management program is designed to minimize tree contact with power lines and includes:

Right-of-Way Maintenance Program: Contract crews perform year-round pruning and clearing on a three-year cycle to reduce outages and support efficient storm response.

Pre-Cycle Maintenance Program: Crews inspect circuits during routine patrols to identify and address hazardous or encroaching vegetation between cycles, with input from staff and members.

Notification: WEC may notify members of vegetation work by phone, email, or in person when possible. Contractors may use member contact information to support communication.

Clearance Standards: Clearances are based on vegetation growth rates and must be maintained through each maintenance cycle, including an additional five feet for climbable trees per OPUC requirements.

Tree Removal Programs:
Hazard trees, including those that are dead, decayed, leaning, or otherwise pose a risk to electrical facilities, are removed or cut to a safe height and typically left onsite. Trees within a right of way that require excessive pruning may also be removed, with debris managed appropriately. Notification is provided prior to removal in improved areas when feasible.

Arborist Assistance: Work within 10 feet of energized lines requires qualified personnel. WEC may assist by de-energizing, grounding, or otherwise ensuring safe conditions.

Trimming Standards and Schedule: Pruning follows American National Standards Institute (ANSI) A300 and directional pruning practices to maintain tree health, safety, and reliability. WEC utilizes full-time contracted crews and year-round patrols to inspect and manage vegetation hazards in compliance with OAR 860-024.

Quality Control: VM work is performed by contractors and field-audited by WEC personnel. Quality control efforts evaluate program effectiveness, work performance, and adherence to maintenance schedules.

11 System Patrol and Inspection

WEC maintains a formal inspection and maintenance program for transmission, distribution, and substation assets to reduce safety risks and support system reliability. The program complies with OAR 860-024-0011 (Inspection Requirements) and OAR 860-024-0012 (Maintenance and Repair Prioritization) and includes routine patrols, detailed inspections, and targeted intrusive testing. Inspection frequency is risk-based, with increased patrols applied in higher-risk areas and during periods of elevated fire danger.

Inspection types include:

- **Safety Patrol Inspections** — Visual inspections to identify obvious structural issues and hazards, often conducted during routine operations. Safety patrols are completed on a rolling 2-year cycle.
- **Detailed Inspections** — Comprehensive visual and diagnostic evaluations of equipment, including condition assessments and testing, where practical.
- **Intrusive Pole Inspections** — Testing of wood poles for decay using excavation, boring, and preservative treatment methods.

Detailed and intrusive pole inspections are completed on a rolling 10-year cycle.

Substations receive monthly detailed inspections and annual infrared inspections. Qualified personnel perform all inspections, and identified deficiencies are categorized and prioritized in accordance with OAR requirements.

During detailed line inspections, crews assess poles, conductors, and associated equipment for conditions including mechanical damage, loose hardware, insulator and conductor integrity, vegetation or third-party impacts, fire damage, and compliance with applicable safety standards, including the National Electrical Safety Code (NESC).

Deficiencies are classified as:

PRIORITY LEVEL	DESCRIPTION	TARGET RESPONSE
Priority 1	Safety hazards requiring urgent remediation	Immediate
Priority 2	Conditions that may degrade safety or reliability if not addressed	Scheduled within defined period
Priority 3	Maintenance needs	During routine maintenance cycle

Corrective actions are scheduled based on priority, and inspection and maintenance records are maintained and made available to the OPUC upon request.

Table 3 summarizes the inspection schedule for all assets, while the following sections outline inspection practices for the utility.

Table 3. Inspection Program Summary

ASSET CLASSIFICATION	INSPECTION TYPE	FREQUENCY
Overhead Transmission	Safety Patrol Inspection	50% per year
	Detailed Inspection	10% per year
	Intrusive Pole Test	10% per year
Overhead Distribution	Safety Patrol Inspection	50% per year
	Detailed Inspection	10% per year

	Intrusive Pole Test	10% per year
Underground Distribution	Safety Patrol Inspection	50% per year
	Detailed Inspection	10% per year
Substations	Detailed Inspection	Monthly
	Infrared Inspection	Annually

12 System Improvements

12.1 System Hardening, Construction, and Asset Replacement

WEC has and continues to take steps to harden the electrical system with several upgrades and design changes. These designs stem from many decades of engineering experience and the adoption of emerging technologies. WEC's design practices continue to advance with the addition of newer safety and reliability-related technologies. This advancement recognizes the importance of understanding and adapting to the challenges brought on by public land constraints, development in the WUI, and climate change. The following sections describe these projects.

12.1.1 System Hardening

As WEC replaces existing infrastructure and constructs new facilities, design and construction practices are intended to improve system reliability and reduce wildfire risk. Facilities are designed and maintained in accordance with applicable safety standards and industry practices to support appropriate clearances, equipment performance, and operational safety.

System hardening includes evaluating and implementing construction and design methods that reduce exposure to ignition sources and improve resilience to environmental hazards. These measures are prioritized based on risk, with a focus on areas of elevated wildfire likelihood and potential consequence.

Hardening strategies may include:

- Replacement of selected components with more durable or fire-resistant materials in higher-risk areas
- Evaluation of pole protection methods to reduce exposure to ignition sources
- Strategic undergrounding of distribution infrastructure where feasible
- Application of equipment and materials designed to reduce ignition potential, including covered or insulated conductors
- Design practices that enhance system reliability under adverse environmental conditions

Conversion of overhead lines to underground facilities may be considered in targeted locations where it provides meaningful risk reduction. These decisions are evaluated based on safety considerations, potential impacts to the public and infrastructure, and overall system benefit.

WEC also implements related measures, including avian protection programs, that reduce wildlife-related faults and contribute to overall system resilience.

System hardening practices are continuously evaluated and refined based on operational experience, system performance, and evolving wildfire risk conditions.

12.1.2 Construction Practice

As WEC replaces existing infrastructure and constructs new facilities, construction practices are designed to improve system reliability and reduce wildfire risk. Power line design and construction are performed in accordance with applicable industry standards and safety requirements, including those established by the RUS and the National Electrical Safety Code (NESC). These standards support appropriate clearances, equipment specifications, and safe operation of the electric system.

12.1.3 Timely Replacement of Infrastructure

WEC maintains an ongoing program to replace system infrastructure as it approaches the end of its useful life. Key components of the distribution system, including poles, overhead and underground conductors, transformers, and sectionalizing equipment, are evaluated and replaced based on condition, performance, and operational needs.

Proactive replacement of aging infrastructure supports system reliability and reduces the potential for equipment-related failures, including those that could contribute to wildfire risk. As part of this Wildfire Mitigation Plan, WEC incorporates identification of aging overhead facilities into its inspection and asset management processes.

Infrastructure identified as nearing end of life is prioritized for replacement and incorporated into capital improvement planning based on system needs and risk considerations, including location within areas of elevated wildfire risk.

13 Restoration of Service

Consistent with its Public Safety Power Shutoff framework, WEC may de-energize portions of its system if requested by an external emergency response agency or when WEC determines conditions warrant such action. Following any de-energization event, WEC staff will patrol affected portions of the system prior to re-energization. Suspect equipment or distribution lines that cannot immediately be patrolled will remain de-energized. Poles and structures damaged in a wildfire must be assessed and rebuilt as needed prior to re-energization. Periodic member and media updates of restoration status prior to full restoration will be made.

Restoration and re-energization activities are conducted in a manner designed to minimize the risk of re-ignition and ensure that affected facilities are safe prior to re-energization following wildfire or de-energization events.

After a widespread outage, WEC work crews take the following steps before restoring electrical service after a de-energization event. These measures are intended to protect the workers, members, the public, and WEC's reliability.

Patrol: Following a de-energization event, crews patrol affected lines to verify that no hazards have impacted the system during the outage. In the event of wildfire or other natural disasters, once conditions are deemed safe by appropriate authorities, crews inspect lines and equipment for damage, foreign contact, and required repairs. Lines located in remote or rugged terrain with limited access may require additional time for inspection. WEC personnel assist in clearing downed trees and debris as needed.

Isolate: Isolate the outage and restore power to areas not affected.

Repair: After the initial assessment, WEC supervisors, managers, and engineers plan required work. Rebuilding begins once affected areas are determined to be safe. Repair efforts prioritize substations and transmission facilities, followed by distribution circuits serving critical infrastructure. While WEC aims to restore service as quickly as possible, priority is given to emergency services, medical facilities, and critical infrastructure when resources are limited. Additional crews and equipment are deployed, as necessary.

Restore: Periodic member and media updates of restoration status before full restoration are posted on social media platforms and WEC's website. After repairs are made, power is restored to homes and businesses as quickly as possible. Members, local news, and other agencies receive notification of restored electric service.

Any member-owned electrical metering equipment in need of replacement after a fire event will need to be inspected by the State of Oregon's electrical inspector, documented in a letter from the State of Oregon electrical inspector's office or by other qualified individuals authorized under applicable Oregon electrical inspection requirements.

14 Situational Awareness and Assessment Tools

Situational assessment is the process of evaluating current operating conditions, while situational awareness reflects an understanding of the operating environment that supports informed decision-making and anticipates potential changes in conditions.

WEC utilizes a range of tools and data sources to support near-term and real-time situational awareness, including mapping applications, fire weather forecasts, and operational data. These resources provide insight into current and forecasted wildfire risk, that may include but are not limited to key indicators such as temperature, relative humidity, fuel conditions, and wind speeds.

During fire season, WEC monitors fire danger conditions using multiple indicators, including fire season declarations, precautionary levels, forecasted fire weather conditions, and real-time environmental data. These indicators are evaluated collectively to inform operational decisions and determine when additional mitigation measures are appropriate. Actions are based on overall conditions and professional judgment and are not triggered automatically by any single indicator.

Table 4 provides some of the risk factors which contribute to wildfire and how those factors can be mitigated by WEC.

Table 4. Activities That Address Wildfire Risk Factors

RISK FACTOR	MITIGATION ACTIVITY
Fuel Source	• Vegetation Management • Fuels Reduction • Line Inspections • Rights- of- Way (ROW) Maintenance • Enhanced inspection intervals in high-risk areas

Phase to Phase Contact	• National Weather Service monitoring • Increased inter-phase line spacing • Undergrounding of distribution lines • Reduced span length in high wind areas
Contact from Objects	• Wildlife guards • Increased vegetation clearances • Avian protection specifications • Insulated equipment
Equipment Failure	• Routine maintenance • Focused design and construction standards to reduce ignition sources • Transmission and distribution line detailed inspections and bi-annual patrols • Intrusive pole testing • De-energizing of lines during certain conditions • Infrared inspections of substation equipment
Field Work	• WEC worker/contractor education on fire ignition sources • Tailgate meetings before fieldwork

14.1 Fire Precautionary Period

WEC recognizes that wildfire risk is elevated during seasonal periods when environmental conditions increase the likelihood of ignition and fire spread. While wildfire risk varies annually, these conditions typically occur during the summer and early fall months.

During periods of elevated fire danger, WEC implements additional operational precautions based on situational awareness and risk conditions. These precautions may include enhanced field oversight, modified work practices, increased patrols, and restrictions on certain activities as appropriate to reduce ignition risk.

Contractors and employees are expected to follow applicable safety requirements and take reasonable measures to prevent wildfire ignitions during all field activities. Specific operational controls are implemented consistent with current conditions and risk levels and are not dependent on fixed dates or automatic triggers.

14.2 Workforce Training

WEC provides wildfire-specific training to employees, contractors, and subcontractors. Training is conducted on an annual, seasonal, and task-specific basis, with additional emphasis during periods of elevated fire danger.

- Trained on the content of the WMP.
- Trained in proper use and storage of fire extinguishers.
- Required, during pre-job briefings, to discuss the potential(s) for ignition, environmental conditions (current and forecasted weather that coincides with the duration of work for the day).
- Required to identify the closest fire extinguisher and other fire abatement tools.
- Required to report all ignition events to management for follow-up.
- Encouraged to identify deficiencies in the WMP and bring such information to management.

15 Advanced Protection Settings

WEC utilizes protective devices as part of its overall strategy to reduce wildfire risk and enhance system reliability. These devices include breakers, reclosers, and other overcurrent protection equipment designed to isolate faults and minimize the duration and impact of electrical events.
WEC continues to evaluate and implement advanced protection technologies that improve detection, response time, and coordination across the system. These technologies enhance the ability to identify and isolate fault conditions, including those that may pose increased wildfire risk.

As part of this approach, WEC is transitioning to protective devices with improved performance characteristics, including faster fault-clearing capability and greater flexibility in control settings. These upgrades support more effective operation under elevated fire risk conditions and improve coordination with other system protection equipment.

WEC also evaluates alternatives to traditional fuse-based protection in targeted applications where existing devices may present a higher risk of ignition. Advanced protective devices designed to reduce or eliminate the release of energy during fault interruption may be applied where appropriate to enhance system safety and performance.

Protection system improvements are implemented based on system needs, operational experience, and risk prioritization, with a focus on areas of elevated wildfire risk. WEC will continue to assess emerging technologies and incorporate advancements that support wildfire mitigation, system reliability, and improved situational awareness.

16 Public Safety Power Shutoff

Public Safety Power Shutoffs (PSPS) are a risk mitigation strategy that may be used to reduce the potential for wildfire ignition by de-energizing portions of the electric system during periods of elevated fire danger.

WEC evaluates the use of PSPS as part of its broader wildfire mitigation framework, recognizing that while de-energization may reduce ignition risk, it can also result in significant impacts to public safety, critical infrastructure, and community operations. These considerations may include:

- Impacts to emergency response capabilities and coordination
- Disruptions to communications systems, including internet and mobile services
- Effects on water supply systems and pumping facilities
- Risks to medically vulnerable individuals and healthcare operations
- Loss of critical infrastructure and essential services
- Public safety concerns associated with evacuations and access limitations
- Economic impacts to local businesses and communities

Decisions to de-energize facilities are made on a case-by-case basis using available situational awareness, system knowledge, and risk information. No single factor determines whether a PSPS will be implemented. WEC considers both the likelihood of wildfire ignition and the potential consequences of de-energization in making these decisions.

WEC communicates with affected members and coordinates with relevant stakeholders throughout de-energization and restoration activities whenever feasible. Restoration activities are conducted with a focus on safety, system integrity, and minimizing disruption.

PSPS is maintained as a discretionary, last-resort operational tool to reduce wildfire risk under extreme conditions. WEC will continue to evaluate and refine its approach as system conditions, operational experience, and industry practices evolve.

17 Emergency Response and Preparedness Planning

WEC maintains an emergency response and preparedness framework designed to support public safety, system reliability, and coordinated response during wildfire and other disruptive events. This framework emphasizes clear communication, coordination with partners, and timely response actions based on situational conditions.

17.1 Crisis Communication

WEC implements communication practices intended to provide timely, accurate, and consistent information during emergency events. These practices support coordination with employees, members, responding agencies, and other stakeholders and are designed to reduce confusion and ensure effective information sharing.

17.2 Emergency Management Communication and Coordination

During emergency events, WEC coordinates with local, regional, and state partners to support response activities and maintain situational awareness. Coordination may include information sharing, alignment of response actions, and participation in incident management functions, as appropriate. WEC personnel participate within the National Incident Management System (NIMS) and Incident Command System (ICS) framework when emergency response agencies establish incident command.

WEC maintains defined internal roles and responsibilities for emergency coordination, communication, and decision-making to support effective organizational response.

17.3 Reporting Fires

WEC reports wildfire incidents associated with its system or observed during field operations to appropriate emergency response entities as soon as practicable. Relevant information is provided to support response efforts and situational awareness.

17.4 Fire Response and Suppression Capabilities

WEC's service territory includes large, rural, and at times difficult-to-access areas where wildfire response resources may be limited. WEC coordinates with available response organizations and supports fire response efforts as appropriate to protect public safety and utility infrastructure.

17.5 Coordination with Stakeholders

WEC engages with local governments, emergency response organizations, and community partners to support wildfire preparedness, response, and recovery activities. Coordination efforts are intended to enhance communication, improve response effectiveness, and support community resilience.

17.5.1 Mutual Aid Participation

WEC recognizes the importance of regional coordination and mutual assistance during wildfire and other emergency events. WEC may participate in mutual aid efforts with neighboring utilities, electric cooperatives, public utilities, and other utility organizations to support emergency response, damage assessment, system restoration, and operational continuity.

As resources are available, WEC may request or provide assistance through established mutual aid frameworks, including participation in the Oregon Utility Wildfire and Emergency Response Network and other cooperative emergency response programs. Mutual aid coordination may include personnel, equipment, materials, technical support, and operational assistance during emergency conditions.

Participation in mutual aid efforts supports system resiliency, improves restoration capabilities, and enhances regional emergency preparedness and response coordination.

17.6 Work Crew Communications

WEC and its contractors maintain reliable communication capabilities during field operations to support safety, coordination, and timely response during emergency conditions.

17.7 Member Communication

WEC provides information to members on wildfire preparedness, risk reduction, and emergency response through ongoing outreach and communication efforts. These activities are intended to encourage proactive measures that improve safety and readiness during wildfire conditions.
WEC utilizes multiple communication channels to share information with members, including newsletters, website resources, direct communications, and community engagement opportunities. Educational content focuses on wildfire preparedness, system impacts, and actions members can take to reduce risk and enhance personal safety.

WEC maintains current member contact information to support communication during emergency response events. In addition, the WEC website includes resources related to wildfire risk, preparedness measures, and relevant guidance to support member awareness.

During wildfire events or periods of elevated risk, WEC provides updates to members regarding system conditions, potential impacts to electric service, and restoration efforts when outages occur. Communications may direct members to appropriate emergency management and fire response agencies for information related to evacuation status and public safety notifications.

WEC may participate in community outreach efforts, including public meetings and educational events, to support member awareness of wildfire risks and preparedness measures.

17.8 Public Emergency Alert Systems

WEC utilizes available public notification systems and communication channels to provide information to members during emergency events, to the extent practicable. These notifications support public awareness and response to evolving conditions.

18 Performance Monitoring

18.1 Performance Metrics

WEC tracks wildfire mitigation effectiveness using the following metrics:

- Percentage of system inspected annually versus plan
- Miles of vegetation cleared versus target
- Number of wildfire ignition events associated with WEC facilities
- Outage frequency and duration in high fire risk areas
- Time required to restore service following wildfire-related outages

These metrics are used to evaluate the effectiveness of wildfire mitigation strategies in reducing wildfire risk associated with WEC facilities, consistent with the objectives of SB 762.

18.2 Identify Deficiencies in the WMP

Staff are responsible for spearheading discussions on addressing deficiencies and collaborating on solutions when updating the WMP. When deficiencies are identified, staff evaluates each reported deficiency to determine their validity.

18.3 Documentation and Recordkeeping

WEC maintains records of inspections, maintenance, vegetation management, and corrective actions in accordance with applicable regulatory requirements.

Records include:

- Inspection results
- Identified deficiencies and classification
- Corrective action tracking
- Completion verification

Records are retained in accordance with WEC's records retention policies and applicable regulatory requirements and are made available for regulatory review upon request.

19 WEC Contact Information

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20 Revisions

VERSION	DATE	ACTION
V.1.1	March 24, 2022	Approved by WEC Board of Directors
V.1.2	May 25, 2023	Approved by WEC Board of Directors
V.1.3	June 21, 2024	Approved by WEC Board of Directors
V.2.1	June 25, 2026	Approved by WEC Board of Directors

Appendix A: Definitions

Fire Hazard: The physical conditions that influence the likelihood of an area burning over time, including vegetation, topography, and climate, without consideration of mitigation measures.
Fire Risk: The combination of the likelihood of an ignition event and the potential consequences, including impacts to life, property, infrastructure, and the environment.
Fire Weather Watch: A notice issued by the National Weather Service indicating that conditions favorable for wildfire development are expected within a specified timeframe, typically 12 to 72 hours.
Flashover: A type of fault or short circuit caused by a lightning strike to a live electrical system. Faults can occur anywhere along power lines- at transformers, poles, towers, and substations. Arcing from flashovers can cause extensive damage to electrical equipment, even more so than the lightning that caused them.
Hazard Tree: Dead, dying, and diseased trees; multi-stemmed conifers with included bark; and excessively leaning trees (including those that are growing outside of the right-of-way limits) that could damage overhead electrical facilities if they failed structurally.
High Fire Threat Area (HFTA): Locations where risk scores exceed a defined threshold based on WEC's risk methodology. These areas receive enhanced mitigation measures including increased inspection frequency, vegetation management, and operational controls.
Ignition Event: Any instance in which utility equipment, facilities, or operations are a contributing factor to the start of a fire.
Industrial Fire Precaution Level (IFPL): A system used to regulate industrial activities during fire season based on fire danger levels, with increasing restrictions on operations as fire risk escalates.
Precautionary Period: The time of year when wildfire conditions are expected to occur in the service area.
Public Safety Power Shutoff (PSPS): The proactive de-energization of electric facilities during periods of elevated wildfire risk to reduce the potential for utility-related ignitions.
Recloser: An automatic protective device used in electric distribution systems to interrupt power flow when a fault is detected and recloses to restore service if the fault condition clears.
Red Flag Warning (RFW): A notice issued by the National Weather Service indicating that critical fire weather conditions are occurring or imminent, including combinations of low humidity, high winds, and dry fuels that support rapid fire growth.
Readily Climbable: Vegetation that can be easily climbed by a person due to low limbs and structural characteristics and poses a risk of contact with energized conductors.
Rights-of-Way (ROW): The land corridor along which electric facilities are constructed and maintained, including the area necessary to provide safe clearance from vegetation and other obstructions.
Risk Drivers: Environmental, operational, or infrastructure-related factors that influence wildfire risk, including weather conditions, fuel characteristics, topography, accessibility, and equipment conditions.
Situational Awareness: The process of monitoring, evaluating, and understanding current and forecasted environmental, system, and operational conditions to support informed decision-making and timely implementation of mitigation actions.
Substation: A facility within the electric system where voltage is transformed, switched, or controlled to support the transmission and distribution of electricity.
System Hardening: Modifications to electric infrastructure to reduce the likelihood of ignition and improve electrical assets' survivability.

Transmission and Distribution (T&D): The components of the electric system that deliver power from bulk power sources to end-use members, including high-voltage transmission lines and lower-voltage distribution systems.
Vegetation: Trees, shrubs, and any other woody plants.
Vegetation Management: A broad term that includes tree pruning; brush removal using power saws and mowers; the judicious use of herbicides and tree growth regulators; hazard tree identification and removal; the implementation of strategies to minimize the establishment of incompatible species under and near power lines; and the control of weeds.
Wildfire and Emergency Response Network: A voluntary mutual assistance network that facilitates coordination and resource sharing among utilities and participating organizations during emergency events, including wildfires, severe weather events, and other system emergencies. WARN programs support restoration efforts through the sharing of personnel, equipment, materials, and technical expertise.
Wildfire: An unplanned and uncontrolled fire occurring in vegetation such as forest, grass, or shrubland that has the potential to spread and cause damage to people, property, and natural resources.
Wildfire Mitigation Plan (WMP): A comprehensive plan to reduce the threat and severity of wildfire within an electric utility's service area. A WMP includes preventive strategies and programs adopted by the utility to minimize the risk of its facilities causing wildfires along with its emergency response and recovery procedures.

Appendix B: Acronym Glossary

ANSI	American National Standards Institute
COU	Consumer-Owned Utility
HFTA	High Fire Threat Area
IFPL	Industrial Fire Precaution Level
NESC	National Electric Safety Code
OAR	Oregon Administrative Rules
OH	Overhead
OPUC	Oregon Public Utility Commission
ORS	Oregon Revised Statutes
PSPS	Public Safety Power Shutoff
RFW	Red Flag Warning
ROW	Rights-of- Way
RUS	Rural Utilities Service
T&D	Transmission and Distribution
UG	Underground
VM	Vegetation Management
WEC	Wasco Electric Cooperative
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan
WUI	Wildland-Urban Interface