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Via Electronic Filing

Filing Center
Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem, OR 97301

Re: Umatilla Electric Cooperative 2026 Wildfire Mitigation Plan – Redacted
Docket No. RO 14

Dear Filing Center:

Enclosed please find Umatilla Electric Cooperative's Redacted 2026 Wildfire Mitigation Plan. Please note that the Confidential version of the 2026 Wildfire Mitigation Plan will be delivered in separate emails to the Commission.

Should you have any questions regarding this filing, please call.

Very truly yours,



Chad M. Stokes

CMS:tb



Wildfire Mitigation Plan

June 2026

Redacted

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INTRODUCTION:

This Wildfire Mitigation Plan (WMP) applies to all Umatilla Electric Cooperative (UEC) owned electric assets that UEC operates and maintains. This WMP has been developed to meet the identified conditions and risks associated with the service area in which UEC operates. The territory served includes a substantial portion of the Columbia Basin and the Blue Mountain region in Northeastern Oregon.

UEC's Manager of Operations is responsible for developing and overseeing the implementation of the WMP. The Manager of Operations is supported by a Wildfire Mitigation team, which includes the Superintendent of Operations, the Manager of Engineering, and the Manager of Public Relations.

OVERVIEW

This WMP identifies the preventive actions and programs that UEC implements to minimize the controllable risk against its electrical assets starting or perpetuating a wildfire. The importance of this Plan reflects that Oregon is among the western states that experience significant wildfire activity. As the electric industry continues to mature, its approach to managing controllable risks from electric infrastructure-related wildfires is evolving. The WMP drives collaboration and coordination across the organization, with public safety partners, and members. The Plan uses a risk-based approach to understand high probability and high impact factors so resources can be focused on where activities will be most effective and impactful. The major components of the WMP framework are:

Situational Awareness – Understanding fire-prone conditions to inform mitigation measures including data about vegetative fuels and weather.

Operational Practices – Field and systems operations practices used to mitigate wildfire risks, including prescribed field procedures and no-reclose practices.

Emergency Response – Under extreme fire weather conditions, emergency protocols include temporarily de-energizing select circuits when wildfire hazards may be present.

Vegetation Management – The practices that focus on electrical clearances, distances, removal of hazard trees, fuels reduction and ongoing activities to minimize the chances of vegetation striking lines or being the potential source of an ignition.

Inspections and Corrections – The frequency of patrols and inspections, based on wildfire risk and related maintenance to mitigate against electric system-caused wildfires.

System Hardening and Ruggedization – Equipment that lowers ignition risk such as non-expulsion devices, protective relays, and fire-resilient infrastructure focused in high fire risk areas to reduce impacts of wildfires and maintain service continuity.

Communications and Outreach – Multi-pronged approach to communicating and collaborating with employees, public safety partners, governmental agencies, other critical infrastructure providers, members, and key stakeholders.

Taken altogether, these create a portfolio approach to wildfire risk reduction to lower wildfire risk related to electric cooperative infrastructure.

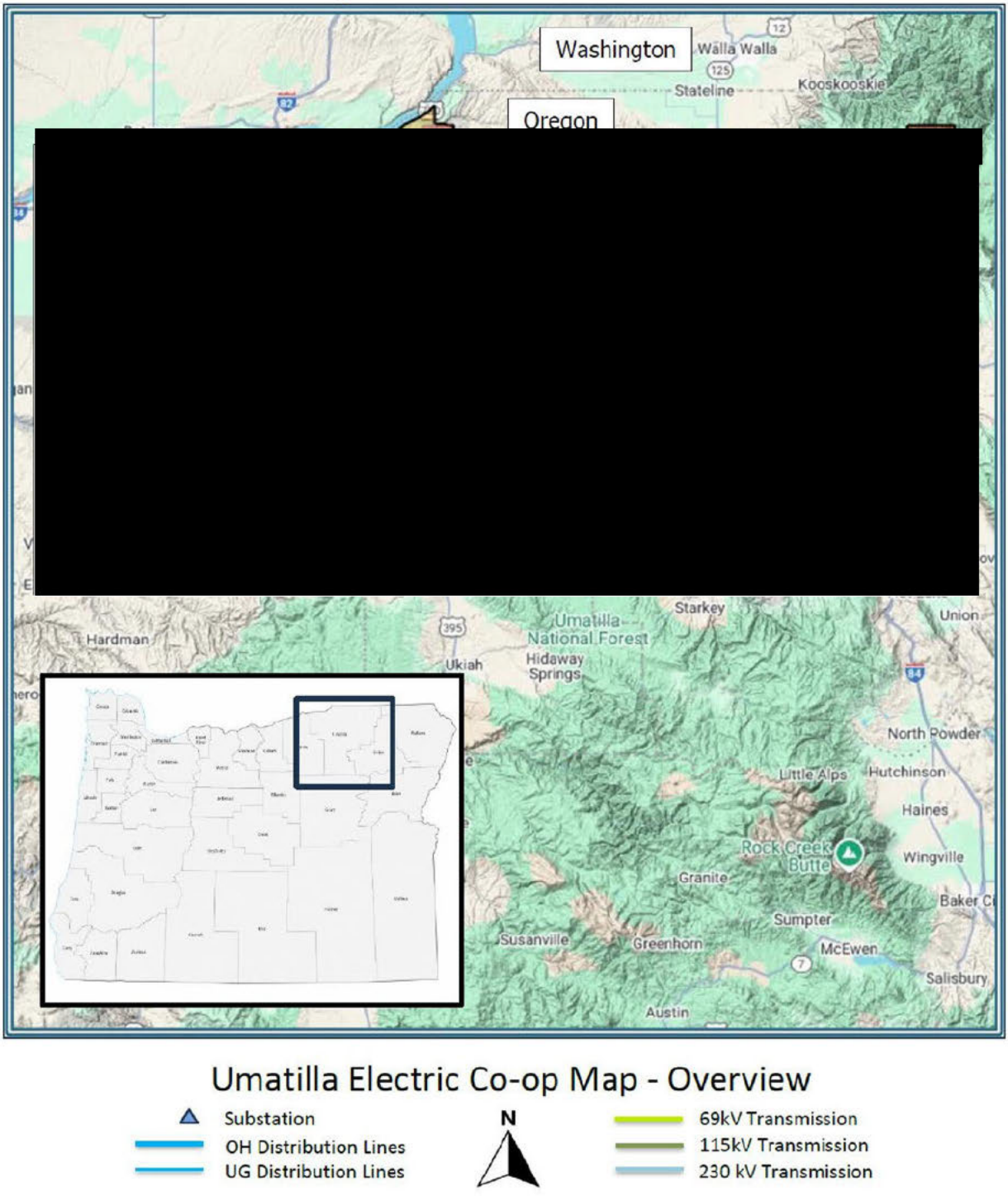
Figure 1. Portfolio Approach to Wildfire Mitigation Planning



1.1. Overview and Electric Service Area

UEC is a member-owned, non-profit electric cooperative founded in 1937, owned by, and operated to the benefit of, the members that it serves. Reliability and resilience are a continuous focus of cooperatives, particularly in the western United States that face high demand growth and a heightened risk of wildfires.

Figure 2. UEC Electric Service Area



Electric infrastructure, especially overhead powerlines, represents a category of electric infrastructure with the potential to cause or perpetuate wildfires. UEC's WMP considers the areas where transmission and distribution infrastructure are present.

2. QUANTIFYING WILDFIRE RISK

2.1. Risk Driven Decision Making Framework

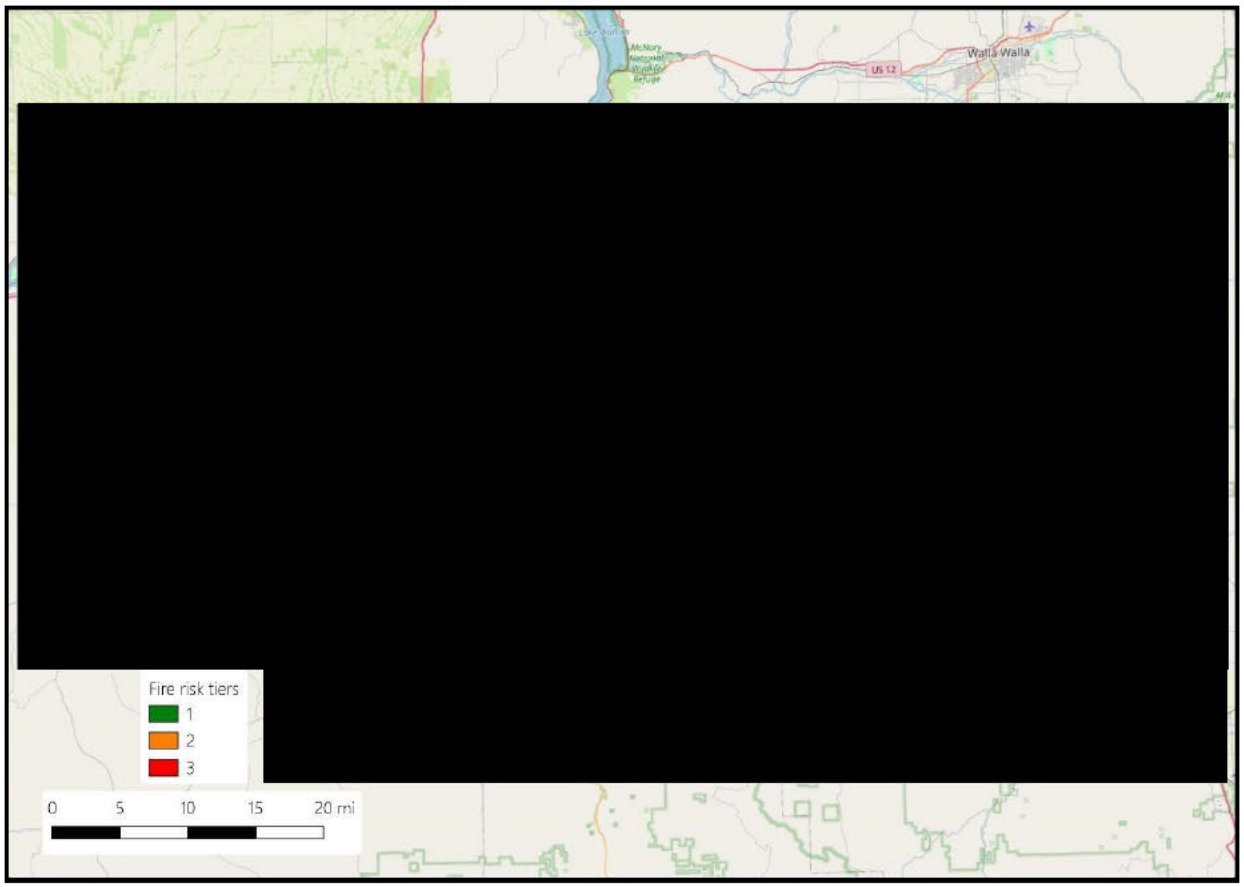
UEC has undertaken a variety of activities to prioritize wildfire mitigation related actions to areas that are most prone to wildfire activity. Ongoing collaboration with Umatilla County's and Morrow County's local governments and emergency management informs UEC's understanding and awareness of wildfire risks. UEC leverages advanced modeling techniques with data driven technologies to assess risk on both a short-term operating and long-term planning basis. The risk-based approach, utilized throughout the industry, is designed to reduce the likelihood of wildfires related to UEC's infrastructure and assets.

2.2. Identifying Wildfire Threat Risk

2.2.1. Wildfire Risk Modeling

CloudFire, Inc. conducted UEC's wildfire risk modeling related to the electric grid, summarized into a Planning Model to inform initiatives and operating decisions. The Planning Model defines wildfire risk Tiers that are used for program and project planning purposes. CloudFire's modeling includes more than one hundred million computer-simulated fires modeled under historical conditions. The analysis uses advanced algorithms that considers equipment outages, surface and canopy fuel layers from the United States Forest Service (USFS) Landfire.gov information, 15 years of gridded climatology based on a 2.5 km resolution, topography from the United States Geological Survey and building footprints from Microsoft. Primary circuit span-level outputs for each modeled fire include a number of impacted structures, acres of timber burned and approximate suppression costs. The resulting risk scores are ranked and grouped into wildfire Tiers as shown in the example in Figure 3. UEC will evaluate the risk model at least annually as part of an end of season review.

Figure 3. Wildfire Risk Tiers Overview



Wildfire Risk Tiers indicate likelihood and impact of electric infrastructure-related wildfires. This understanding helps UEC prioritize mitigation measures relative to risk within the service territory. Measures may include special operating procedures, elevated hardening standards, more frequent vegetation management, or increased asset inspections. Circuits are organized into wildfire risk Tiers based on their risk relative to each other within UEC's service territory. CloudFire outputs support planning and prioritization of risk reducing initiatives.

The current designations of UEC's risk Tier circuits are shown in the following Figures. Figure 4 shows the risk Tiers on the west side of Umatilla's electric system. Figure 5 shows the risk on the east side. The Tier levels are used in planning and to guide operating decisions, such as inspection scheduling, no-reclose and Public Safety Power Shutoff (PSPS). These circuits are in higher elevations and mountainous regions where climate conditions increase fire risk and warrant enhanced fire risk mitigation actions.

Figure 4. UEC Wildfire Risk Tiers- West Side

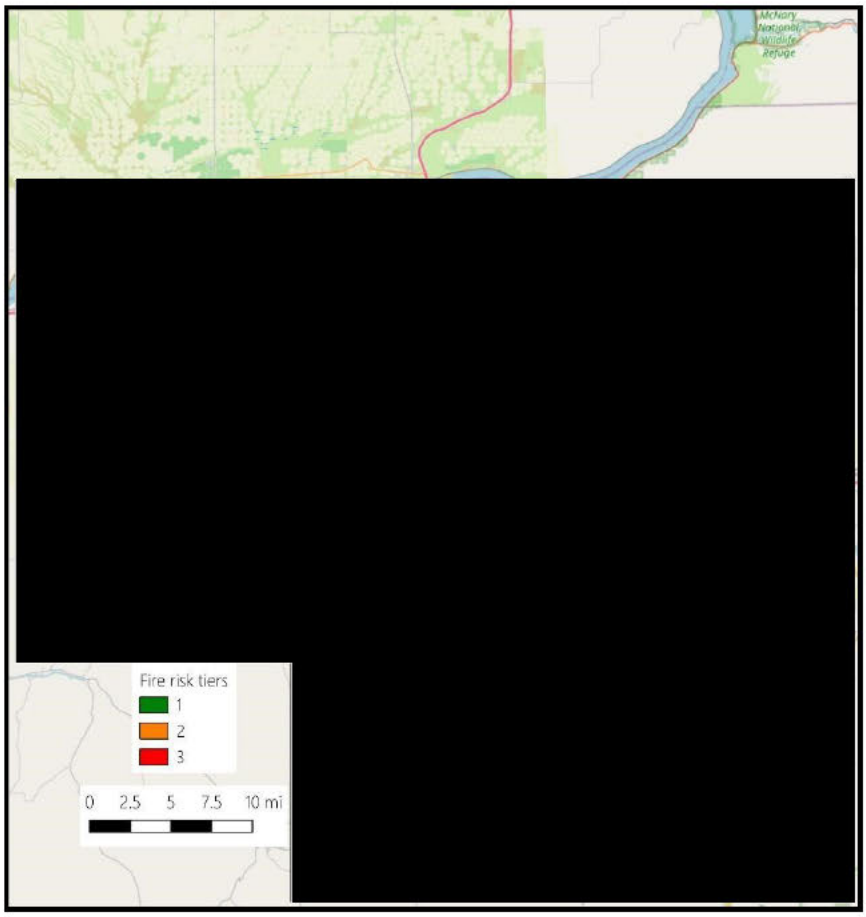
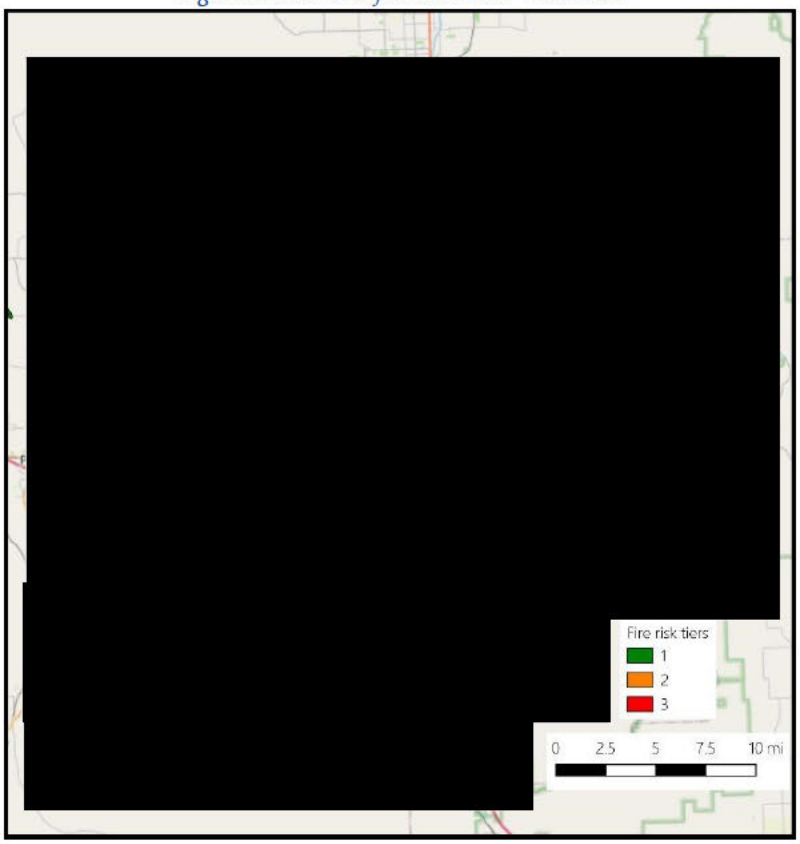


Figure 5. UEC Wildfire Risk Tiers - East Side



The Wildland Urban Interface, or WUI, is the zone of transition between unoccupied land and human development, where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. The WUI is continually evolving, and periodic assessment of risk helps to identify whether mitigation actions in the WUI are needed to reduce risk. The CloudFire analysis considers the WUI in its assessment. UEC evaluates the WUI impacts across their electric system footprint at least annually as part of an end of season review.

3. WILDFIRE RISK REDUCTION STRATEGIES AND PROGRAMS

The following section outlines the various approaches UEC uses to understand and mitigate wildfire risk.

3.1. Situational Awareness

A key factor in risk mitigation is understanding where and how significantly wildfires could impact or could be impacted by electric infrastructure and assets. UEC implements technologies and collaborates with other agencies to maintain awareness of wildfire risks on both a short-term and

long-term basis. UEC continues to evaluate tools and resources to support situational awareness as part of the overall risk reduction strategy.

3.1.1. Fire Weather Indicators

UEC collaborates with outside agencies to maintain awareness of wildfire hazards, leveraging weather station information, local weather services, collaborating agencies, and field personnel. The operations team collates information into daily weather reports. Key weather indicators include Red Flag Warning, sustained winds, wind gusts, and low humidity levels. Weather factors are known to contribute to the risk of wildfires. For example, high wind conditions could elevate the likelihood or impact of wildfires. Currently, UEC's team uses weather stations that are deployed within the service territory to validate current conditions to the forecasts. Weather informs field conditions and potential work windows.

During wildfire season, UEC receives information about weather conditions and fire restrictions from the USFS and other outside sources. UEC utilizes this information to make decisions about field and grid operations protocols. UEC compiles fire weather outlooks daily that include factors that are indicative of fire weather conditions, such as Red Flag Warning, fuel moisture, and sustained winds and gusts. The weather outlook includes a 7-day forecast, and 24-hour snapshots that are updated hourly.

3.2. Operational Practices

Special seasonal operational procedures are used to mitigate the potential ignition or spread of wildfires from electric infrastructure. UEC initiates the following field and systems operations practices used to mitigate wildfire risks, including prescribed field procedures and no-reclose policies when observed and reported weather factors, including but not limited to temperature, humidity, and wind speed indicate risks are approaching wildfire conditions. Adaptive control room operations and field operations are implemented to mitigate against wildfire risk. UEC reviews wildfire risks related to specific circuits and infrastructure annually to identify where operational restrictions for wildfire prone areas might further reduce risk.

3.2.1. Transmission and Distribution Operations Practices

UEC utilizes these enhanced fire-season practices when weather conditions including but not limited to temperature, wind speed, and humidity, as well as red-flag warnings warrant. Wildfire conditions are coordinated and communicated using the most conservative threat condition as the trigger for adaptive transmission and distribution operations.

During heightened fire season, UEC will turn off automatic circuit reclosing, resulting in one trip to lock out the circuit. Should a circuit trip while set to no-reclose, patrol and necessary maintenance will be completed prior to re-energizing. Other wildfire protection measures include adhering to work restrictions established by the Authority Having Jurisdiction (AHJ).

UEC uses protective relaying to automatically de-energize equipment should an anomaly be detected. In normal circumstances, when there is an interruption, or fault, on the circuit multiple reclosing attempts will automatically occur. If a temporary fault condition no longer exists, the circuit quickly recloses by itself restoring electric service. UEC implements a no-reclose approach during the severe fire weather season. Using the no-reclose approach, should a fault occur due to an undesirable field condition, the grid remains de-energized until the impacted lines can be patrolled and re-energized when safe conditions are confirmed. This practice avoids reclosing into a hazard that could cause sparks.

3.2.2. Wildland Fire Preparedness for Field Personnel

Wildland Fire Season guidelines are updated and communicated annually by the USFS. UEC uses the USFS guidelines and has fire preparedness information for field personnel that lays out fire threat conditions, work practices, and required Personal Protective Equipment (PPE) required under the different fire restriction stages.

3.3. Wildfire Response / Emergency Management

UEC has a robust emergency management structure and is well equipped to manage crisis situations related to its assets and infrastructure. Wildfire mitigation and response coordinates inputs from multiple areas of responsibility and expertise, as well as from external partners. The primary liaison to external parties for wildfire mitigation is UEC's Wildfire Mitigation team.

Ongoing coordination and regular updates with emergency response personnel and public safety partners within the UEC service territory are a cornerstone of wildfire safety and mitigation. Information sharing and training exercises are an important part of working together in support of public safety. The UEC Wildfire Mitigation team conducts outreach and awareness, including coordination activities with public safety partners and members in areas identified to be at higher risk. During an active wildfire, UEC may de-energize affected facilities in coordination with local emergency management personnel and at the request of the incident response command as necessary to support firefighting operations or protect public safety.

3.3.1. Proactive De-energization / Public Safety Power Shutoff

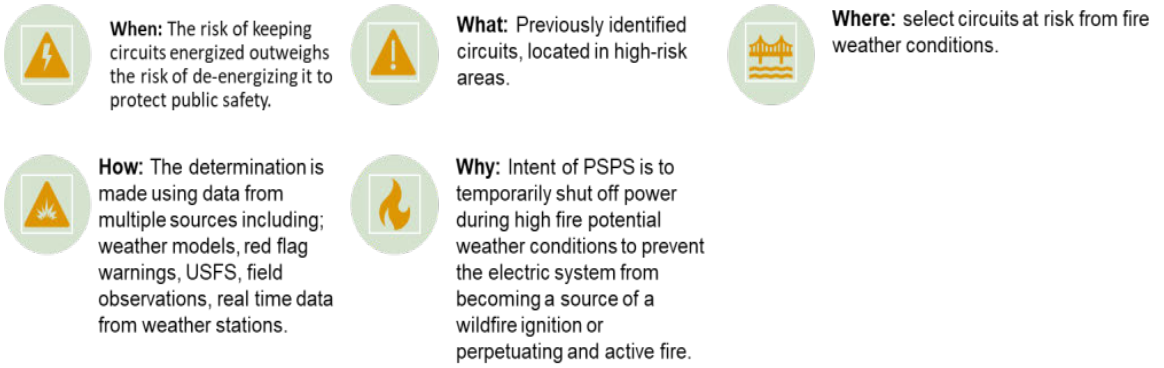
UEC is committed to public safety and mitigating the risk from wildfires is a top priority. PSPS is a proactive de-energization program used to help minimize the risk of wildfires related to electric

infrastructure. During a PSPS, UEC may temporarily shut off power within specific areas when certain weather and other environmental conditions exist to prevent equipment or debris from starting or contributing to a wildfire. UEC evaluates the potential for fire conditions during weekly operational briefings in addition to ongoing monitoring for PSPS conditions in real-time. The goal of the operational briefings is to proactively monitor and assess potential PSPS conditions. The program is limited to certain members in specific wildfire risk areas where overhead electric infrastructure is present that may be at risk under certain fire weather conditions. Among other factors, UEC evaluates temperature, wind speed, humidity, field observations and Red Flag Warnings issued by the National Weather Service to determine if a PSPS is warranted. In addition to these factors, UEC considers the following potential impacts related to a PSPS:

- Potential loss of water supply to fight wildfires due to loss of production wells and pumping facilities.
- Negative impacts to emergency response and public safety due to disruptions to the internet and mobile phone service during periods of extended power outages.
- Loss of key community infrastructure and operational efficiency that occurs during power outages.
- Medical emergencies for members of the community requiring powered medical equipment or refrigerated medication. Additionally, the lack of air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities.
- Traffic congestion resulting from the public evacuation in de-energized areas can lengthen response times for emergency responders.
- The inability to open garage doors or motorized gates during a wildfire event can lead to injuries and fatalities.

The decision to initiate PSPS will be made on a case-by-case basis based upon these evaluations. Except where immediate action is required to protect public safety or support emergency response operations, decisions to proactively deenergize circuits in the absence of fires are made following appropriate coordination and communication with affected stakeholders, recognizing that critical services could be impacted. When feasible, a PSPS action includes notifications to potentially impacted parties, including local emergency managers and affected members as far in advance as practicable. Special attention is given to notifying members that have informed UEC of their medical needs for uninterrupted electric supply.

Figure 6. Rubric for PSPS



UEC monitors weather throughout the year but focuses on certain extreme weather patterns and other environmental criteria that create a heightened risk of wildfire ignition. UEC may consider proactive deenergization of select circuits when fire weather conditions are forecasted. In the event of an active wildfire, the system may be de-energized to support first responder safety, including circumstances in which advanced notification is limited or impracticable. On circuits that are de-energized because of wildfire risk or active fire conditions, the circuits will be re-energized when UEC determines that it is safe to restore service. This determination may include line patrols, input from emergency agencies, systems observations, and other determining factors.

3.4. Vegetation Management

Vegetation Management involves the manual, mechanical, and chemical treatment of vegetation in rights-of-way (ROW) to support transmission and distribution system reliability and to reduce wildfire risk. Vegetation trimming and removal is an important line of defense against wildfires potentially being caused by the presence of UEC transmission and distribution infrastructure. The corridor clearing program has lowered ROW vegetation encroachment risk for circuits.

UEC maintains a vegetation trimming and removal schedule to prevent vegetation-related transmission outages, minimize distribution outages, and lower the incidence of wildfires. The UEC Bulk Electric System (BES) is guided by the North American Electric Reliability Corporation (NERC) standards[1] with requirements for lines clearing. The lower voltage system uses a four-year cycle for trimming as shown in Table 1.

Hazard trees, those outside of the ROW corridor that present risk to electric infrastructure, are removed on an annual cycle subject to third party landowner permission. UEC's transmission

[1] 1 NERC Standard FAC – 003 or its successor.

infrastructure is inspected on an annual cycle to identify hazard trees for remediation. The UEC lower voltage system is also inspected and maintained annually by the removal of hazard trees along the ROW.

UEC's vegetation management approach is informed by its Fire Risk Tier analysis and includes targeted efforts to reduce vegetation fuels along and under the lines in higher-risk areas. These activities are intended to reduce the risk that falling debris could contribute to an ignition. UEC also performs vegetation removal, mastication, and mowing around power poles and other electrical assets to reduce vegetative fuels. UEC performs an annual vegetation inspection of all 230 kV, 115 kV, and 69 kV lines and completes a full vegetation management cycle across the rest of its service territory every four years. In addition, mountainous areas with elevated wildfire risk receive an annual vegetation patrol before each fire season to identify and address potential hazards.[2]

UEC follows the protocols from the USFS to implement an herbicide program for vegetation management in UEC corridors on agency-owned lands. Herbicide treatment complements mechanical clearing programs for maximum effectiveness where allowed.

UEC uses drones and high-definition cameras for inspection. A drone patrol is conducted every four years to identify encroaching vegetation and asset maintenance needs. This program supports the vegetation management program and provides asset and equipment information for the Inspections and Corrections program.

3.5. Inspections and Corrections

Asset condition awareness is a key to understanding wildfire risks. Failing equipment can be a source of sparks that can ignite a wildfire. UEC conducts routine patrols and inspections on the transmission, sub-transmission, and distribution systems to identify and remediate potentially unsafe field conditions. Inspections entail careful visual reviews accomplished by visiting each transmission, sub-transmission, or distribution structure and spans between structures as part of a component-by-component evaluation that identifies unusual conditions and anomalies. UEC conducts inspections by ground or by air. While most patrols are scheduled in advance, additional patrols are completed as needed. Table 1 shows the inspection cadences for both assets and vegetation. When scheduling routine inspections, UEC will also take the identified Fire Risk Tiers into consideration.

[2] Meacham and Weston Mountain.

Table 1. Inspections for Assets and Vegetation

Voltage / Type	Asset Inspection	Vegetation Inspection
230 kV BES	Annual drone inspection	Annual ground patrol for vegetation
230 kV non-BES	Annual drone inspection	Annual vegetation inspection
115 kV	Drone inspection on a 4-year cycle, 25% per year	Annual vegetation inspection
69 kV	Drone inspection on a 4-year cycle, 25% per year	Annual for vegetation encroachment
12.47 kV	• Safety inspection every 2 years • Pole inspection every 10 years • Annual for reclosers • Quarterly for regulators • Twice a year for capacitors	• Annual in heightened fire risk tier areas • 4 years as part of a cycle trim, 25% per year

Detailed inspections are used to identify potential issues and relative urgency of repairs. Potential anomalies or systems concerns that may present an increased wildfire risk will be prioritized. Inspections are conducted on schedule and can also supplement ground patrols when needed.

High-resolution cameras are used to record findings made during the inspection. Asset conditions are recorded with work orders created for follow-up as needed.

Performance-based circuit inspections may be implemented in high-risk areas based on wildfire threat modeling results. If a special inspection is needed, UEC will conduct a detailed inspection of the entire circuit. These special inspections may use Unmanned Aerial Vehicles (UAV) drone flyovers to identify anomalies that affect the circuit. Special inspections do not change the cadence of the regular inspection cycle. The transmission team may conduct accelerated line patrols based on operation requests.

UEC's system of corrections is prioritized based on conditions identified in the field and potential wildfire risk factors. UEC's work management system is utilized to capture all history, creating a full picture of the asset condition. The repair work becomes part of the asset's history to manage overall asset health.

UEC also considers causes of circuit performance issues and may identify tailored mitigation recommendations. If a chronic field problem, no longer maintainable degraded condition, or untenable field condition is identified, UEC may create a new standard that will support wildfire mitigation and remedy the identified field problems.

3.6. System Hardening and Ruggedization

System ruggedization programs intend to harden the system using more rigorous standards and technology improvements. These programs are focused in areas that are more prone to wildfire and are often undertaken in concert with other actions as they can take some time and coordination. Ruggedization programs reduce wildfire risk and have the additional benefit of hardening against other natural disasters. A summary of hardening programs is shown in Table 2.

To mitigate wildfire risk, UEC is deploying non-expulsion devices in high wildfire risk areas. Nonexpulsion devices reduce the risk that equipment could cause a spark or expel hot particles that could cause an ignition. Reducing the potential for arcing or sparking reduces the risk of an ignition from electric equipment.

To reduce the impacts of potential outages, UEC's WMP team identifies where the ability to sectionalize the grid can reduce the impacts of widespread outages. Adding sectionalizing equipment allows for isolating risk to smaller areas and circuit segments to reduce outage impacts. As wildfire threat modeling matures, sectionalization is a useful tool to limit the sections of the grid that may require de-energizing. UEC has also installed advanced remote-operated relays for some long radial lines to support operations under wildfire weather conditions.

As conditions warrant, UEC may replace certain wood poles in fire Tier areas with steel, iron, or fiberglass poles. Where these are not practical, incandescent wrap and other protective coatings may be added to protect poles from wildfire impacts. The wrap expands in the presence of a wildfire, offering pole protection and maintaining structural integrity. This reduces the need to replace poles and structures and reduces outages that would otherwise be needed to replace damaged structures. Incandescent wrap is an UEC standard in fire-prone areas. When wood pole conditions deteriorate to the point of needing replacement, UEC includes incandescent wrap to help mitigate wildfire risk based on the location in a fire Tier.

UEC has updated overhead construction standards in designated wildfire areas that include avian protection. UEC evaluates asset conditions and identifies if additional wildfire hardening is required. UEC has a robust Avian Protection Program and quickly responds to reports of bird nests on power infrastructure from agency partners, employees, members, and the public. UEC maintains the required permits to remove/relocate active nests found on energized infrastructure. This ensures compliance with federal laws protecting birds and reduces the likelihood of nesting material becoming a source of ignition. Proactive bird guarding and other ruggedization programs are conducted in consultation with public safety partners to sequence hardening initiatives.

Table 2. Hardening Initiatives Summary

Program	Description	Benefit
Engineering Standards	Using ruggedized standards for circuits in wildfire Tiers 3 & 2	Equipment that can withstand wildfire and other natural disaster impacts
Underground distribution lines	Selective undergrounding in high wildfire risk areas	Protects vulnerable circuits and communities at risk, leverages grant funding for risk reduction
Non-Expulsion Device	Replacing equipment that could cause spark	Limits ignition potential
Structural Transmission Asset Ranking Program	Transmission Wood pole replacement program	Asset management to replace aging structures that includes wildfire Tiers 2 & 3 to replace wood poles with steel poles
Animal guards and avian protection construction	Covering exposed equipment	Limits faults caused by animal contacts, reducing the potential for sparks
Substation perimeter fencing, weed barrier, perimeter clearing of vegetation, covered equipment	Limits access to substation equipment, clears flammable materials, protects from foreign debris to cause sparks	Reduce substation intrusion that could ignite a wildfire, limits ignition potential in and around the substation from ignition protection
Recloser replacement	Modernized equipment with remote sensing and operating capabilities	Remote and rapid system control reducing truck rolls and improving operational performance to detect and isolate equipment

4. COLLABORATION, COMMUNICATIONS AND OUTREACH

Communications is core to an effective WMP. Multidirectional communications afford the ability to target various audiences with tailored messages. Engaged communities, employees and public safety partners can work together to protect communities and prioritize projects, programs, and initiatives. UEC's collaborators share information about the WMP including wildfire risks, vegetation management programs, and operational practices such as PSPS. UEC's community engagement includes first responders, government agencies, and community members. UEC is actively engaged with other neighboring utilities to understand and coordinate their industry practices.

4.1. Public Safety Partners

UEC collaborates with its public safety partners, forest and fire professionals, emergency managers, and other organizations and agencies related to its Wildfire Mitigation Plan. The Wildfire Mitigation team maintains regular contact with outside experts to gain insights into wildfire mitigation, focus on fire-prone communities, and conduct educational sessions.

4.2. Member and Community Communication

Knowledgeable cooperative members are an excellent defense against wildfire ignition and spread. UEC has both broad reaching and targeted communications to support members and communities. Understanding wildfire mitigation initiatives and engaging local resources promotes wildfire preparedness. UEC uses a variety of communication methods, including traditional and broadcast media, the UEC website, social media, print media, and community events to help assure information related to the WMP is communicated and current. UEC maintains information on its website, Avoiding Wildfire Damage – Umatilla Electric Cooperative, that outlines initiatives to mitigate that risk of wildfire. UEC will continue to augment the website for further understanding of the WMP and the importance of being prepared for wildfires, including possible PSPS events.

When there is a need for targeted outreach to UEC members, UEC will conduct direct letter mailings and will also send emails. This same approach is used where transportation routes may be disrupted, access to members sites is required, or brief outages are necessary to complete projects. UEC's Public Relations team develops WMP-related communications. Notifications to communities regarding UEC's wildfire mitigation projects are conducted to inform communities and address questions. Wildfire mitigation highlights may include preparedness and mitigation work in high fire areas.

4.3. Employee Communication

Aware and educated personnel affords the ability for each employee to be an ambassador for wildfire safety in the community. UEC's focus on safety and customer service means that all employees are informed about company activities to mitigate wildfire risk. Resources are available via UEC's web pages and other periodic training. Notifications are posted when fire restrictions are implemented and when they are lifted.

5. PROGRESS TRACKING

Progress is tracked by the Wildfire Mitigation team to monitor risk reduction related to the WMP. The team meets regularly regarding Plan progress. UEC monitors industry practices and incorporates feedback based on technical readiness and effectiveness. UEC conducts an end of year review with community partners and incorporates feedback into the next iteration of the Plan.

Version #	Change	By	Date
1	This 2026 WMP reflects a comprehensive review of the 2025 plan and integrates findings derived from CloudFire risk analysis mapping and tracking data.	Kevin Knutz, Operation Manager	6/23/26