



Wildfire Mitigation Plan

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Executive Summary

Northern Plains Electric Cooperative (NPEC) is a member owned electric cooperative providing electric service to nearly 12,000 member locations in portions of 11 North Dakota counties, including Benson, Eddy, Foster, Griggs, Kidder, Stutsman, Wells, Pierce, Ramsey, Towner and Rolette. NPEC electric system comprises approximately 6,620 miles of medium and low voltage distribution lines. To date, approximately 3,665 miles of line are overhead, and 2,955 miles are underground. NPEC does not own or operate transmission facilities throughout its service territory.

Wildfires are a risk throughout North Dakota and Northern Plains Electric Cooperative's service territory. North Dakota has enacted legislation requiring utilities to put practices in place to reduce the risk of wildfires. This development of the Wildfire Mitigation Plan (WMP) is to help prevent wildfires and the associated damages/losses resulting from those fires. While an electric utility can never fully eliminate the risk of fire, NPEC is committed to taking practical actions to reduce wildfires.

1. Wildfire Mitigation Plan Overview

A. Purpose of the Wildfire Mitigation Plan

Reducing the risk of utility-caused wildfire plays an essential role in NPEC's operational practices. Its existing policies, programs, and procedures are intended to directly or indirectly manage or reduce the risk of its utility infrastructure becoming the origin of a wildfire.

NPEC's WMP is a "living document", subject to modification as regulations and laws are updated, advances in technology occur, and our operational circumstances change.

Additionally, NPEC will coordinate with the relevant County Emergency Managers, local elected representative's offices at the State and Federal level, tribal entities, and our membership, and will review our WMP to ensure continuous improvement and maximum effectiveness.

The goals and activities included in NPEC's WMP focus on a comprehensive and integrated assessment of the risks posed by NPEC's distribution system. This involves an assessment of its equipment and facilities, weather conditions, the density and condition of potential fuels such as vegetation, and the potential threat to public safety.

NPEC’s commitment to fire safety, prevention, mitigation, response, and recovery is a crucial element of our mission.

With this overarching view of fire risk assessment in mind, NPEC presents the activities comprising its WMP.

B. Organization of the Wildfire Mitigation Plan

- Plan Objectives
- Roles and responsibilities for carrying out the Plan;
- Identification of key wildfire risks and risk drivers;
- Description of Wildfire Prevention Strategies;
- Restoration efforts after a wildfire; and
- Community outreach and public awareness

2. Objectives of the Wildfire Mitigation Plan

A. Minimizing Sources of Ignition

NPEC’s WMP is founded upon the goal of minimizing the probability that the various components of our distribution system might become the original or contributing source of ignition for a fire. NPEC continues to evaluate prudent, cost-effective changes and improvements to its physical assets that could and should be made to meet this objective and is implementing preventative operations, construction and maintenance plans consistent with these evaluations.

B. Resiliency of Electric Grid

The secondary goal of this WMP is to improve the resiliency of the electric grid and NPEC continues to evaluate and incorporate new technologies and equipment into its electric system. NPEC’s Operations and Engineering Departments are responsible for evaluating new equipment and use standards for emerging and pre-commercial technologies. Using equipment failure data, the departments determine which technologies should be incorporated into NPEC’s system and which could be improved prior to application. These departments continually evaluate the many new types of technologies which may improve electric reliability and public safety and give special attention to technologies that may contribute to NPEC’s fire-safety goals and objectives.

C. Minimizing Unnecessary or Ineffective Actions

The final goal for this WMP is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program, or protocol is determined to be unnecessary or ineffective, NPEC will assess whether modification or replacement is merited.

This plan will also help determine if more cost-effective measures would produce the same or better results.

3. Roles and Responsibilities

A. Northern Plains' Roles and Responsibilities

NPEC's WMP is subject to the direct supervision of the General Manager and as delegated to Department managers.

All Cooperative employees are responsible for contributing to and performing the activities described in this WMP including:

- Conduct work in a manner that will minimize potential fire dangers.
- Take all reasonable and practicable actions to prevent and suppress fires resulting from Cooperative electric facilities.
- Coordinate with federal, state, and local fire management personnel to ensure that appropriate preventative measures are in place.
- Immediately report fires, pursuant to specified procedures.
- Take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.
- Ensure compliance with relevant federal, state, and industry standard requirements.
- Maintain adequate training programs for all relevant employees.

B. Community Outreach and Communication

In the event of a wildfire, NPEC would utilize all communication channels available including social media, NPEC's website (www.nplains.com) and local media channels. This will be used to aid in timely updates on service interruptions, safety information and restoration progress.

The Cooperative will work closely with local fire departments, providing training on our systems, response plans and fire safety measures to enhance coordination during

wildfire events. The Cooperative will also take into account any recommended changes, reviews or suggestions from local fire departments to continually improve the WMP.

NPEC will also participate in and aid in the development of any state or local wildfire protection or mitigation plans.

4. Wildfire Risks and Drivers

Wildfire risks vary greatly across NPEC's service territory and vary during each season of the year. Land use is also a driver of wildfire, whether it may be cultivated farmland or forested areas.

Within NPEC's service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought;
- Vegetation type;
- High winds and high temperatures;
- Lack of moisture and dry soil conditions

NPEC utilizes a mapping tool for planning and situational awareness to better understand wildfire threats. The map presented in Appendix A was developed using data from the USDA Forest Service Wildfire Risk to Communities (<https://www.fs.usda.gov/managing-land/fire/wildfirerisk>) (<https://wildfirerisk.org/>). The map identifies the calculated wildfire likelihood throughout the Cooperative's area. Per the USDA Forest Service, "Wildfire likelihood is the annual probability of wildfire burning in a specific location."

5. Wildfire Preventative Strategies

A. General Strategies

The regular and routine efforts the Cooperative takes to minimize fires involving its electric distribution facilities include the following:

- Cooperative line crews routinely receive hazard recognition and fire extinguisher training to help identify and handle fire risk issues. Fire extinguishers are carried on vehicles and are tested regularly.
- NPEC follows Rural Utilities Service (RUS) guidelines which require the routine line patrol of the Cooperative's distribution system. The entire system is currently patrolled on a three-year rotation.

- Annually, NPEC conducts a pole inspection of approximately 10% of the total system utilizing an outside contractor. Damaged or rejected poles found during inspection are addressed in a timely manner based on the severity of the damage and/or decay.
- Members and the public receive communication from NPEC to help report hazards that they may see.
- Weather conditions are considered when planning work and determining travel plans.
- Employees are advised to be cautious and on the lookout for smoke and fire hazards while working.
- Employees are trained to identify and communicate where distribution infrastructure may pose a risk of starting a fire.

B. Weather Monitoring

Although the risk of fire is a year-round reality, there are certain recurring environmental and weather conditions when the risks of uncontrolled wildfires in NPEC's service territory are abnormally high and the dangers most severe. If and when these abnormal and dangerous conditions are anticipated or occur, NPEC is prepared to mobilize personnel and resources to abate, mitigate and respond to these conditions and any potential wildfire risk.

NPEC will use the following resources for monitoring weather conditions and wildfire risk:

- <https://www.ndresponse.gov/>
- <https://www.des.nd.gov/>
 - North Dakota Fire Declarations and Burn Restrictions Map
 - ND DES Fire Danger Guide Suggestions and Restrictions
 - ND Emergency Management Regions and County/Tribal Contacts
- <https://www.weather.gov/bis/fire>
- <https://www.weather.gov/fgf/fire>

C. Design and Consideration Standards

Distribution infrastructure is designed and constructed in accordance with RUS standards, which meet or exceed the current NESC. Material is chosen on a case-by-case basis depending on engineering analysis or design standards as indicated in NPEC's current Construction Work Plan.

Undergrounding of distribution lines is an ongoing effort as annual system improvement budgets are established. Almost all new distribution construction is built underground.

Other design considerations include the replacement of oil circuit reclosers with dielectric reclosers that do not contain oil and are able to internally contain an arc.

D. Vegetation Management and Inspections

NPEC performs routine line inspections throughout its service territory according to RUS guidelines and specifications. Any issues related to vegetation, such as trees or brush, that may be near or in distribution power lines are documented. Service orders are created and completed by line crews or a contractor tree trimmer. Danger trees are taken care of on the spot or assigned for immediate attention. Trees and vegetation that are found out of rotation of line patrols are also addressed as well as those that are reported by a member or the public.

E. Situational Awareness – Red Flag Conditions

In the event of a Red Flag Warning from the National Weather Service (NWS), NPEC will avoid specific work activities on the distributions system unless there is a higher risk if the work is not completed. Best efforts will be given to keep vehicles on main roadways except for outage response activities. NPEC may consider reconfiguring protective device settings to non-reclose or hot line tag. This may be done in the field or remotely depending on where the device is located. It is recognized that if these settings changes are made, it may dramatically increase outages and outage restoration times in the event of an operation.

Public Safety Power Shutoffs (PSPS) have been utilized by utilities to mitigate wildfire risk. As a provider of an essential service, NPEC prefers to avoid PSPS unless specifically coordinated with local emergency management directors. Considerations will be given first to public safety regarding first responders, health, communications and water infrastructure needed to help assist during a wildfire. If a PSPS is implemented, there will be an elongated restoration process to patrol lines prior to energizing a line and not igniting a wildfire.

6. Restoration Efforts After a Wildfire

Restoration efforts after a wildfire event consist of the following:

- Line Patrol: Safety is the number one priority after a wildfire event. All lines affected need to be patrolled visually to identify any new hazards that may have arisen during a fire or planned outage.
- Isolation: Any damaged line sections or hazards will be isolated from the main line to prevent potential to re-ignite a fire.

- Repair: Damages and hazards will be repaired systematically from the substation working downline to get the most members back online quickly. Priority will be given to critical services such as life safety and critical infrastructure.
- Restoration: Line sections will be gradually restored as all hazards have been cleared and lines have been deemed safe.

7. Community Outreach and Public Awareness

NPEC has created a multi-level approach to community education and outreach as our contribution to public awareness of fire threats, fire prevent and emergency preparedness. The key elements of this approach are:

- Member education including emergency preparedness and backup generator safety;
- Education information disseminated through the NDAREC ND Living magazine;
- Working closely with local fire departments, providing training on our systems, emergency response plans and fire safety measures to enhance coordination during wildfire events.

8. Evaluating the Plan

On an annual basis, NPEC will evaluate the WMP, including the plan's performance and compliance. Such review will include a review of any claims, maintenance, operations, training and communication issues.

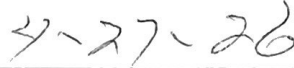
This WMP is subject to review by the NPEC Board of Directors. The WMP will be reviewed and reapproved by the NPEC Board of Directors every two years. During such review, any issues with the WMP will be identified and addressed.

Board of Directors Certification

As Secretary of Northern Plains Electric Cooperative, Inc. I do hereby certify that the Wildfire Mitigation Plan presented was approved and adopted by the Board of Directors.



Secretary



Date

Revision History

Revision 0 – Original Review, April 2026

Appendix A

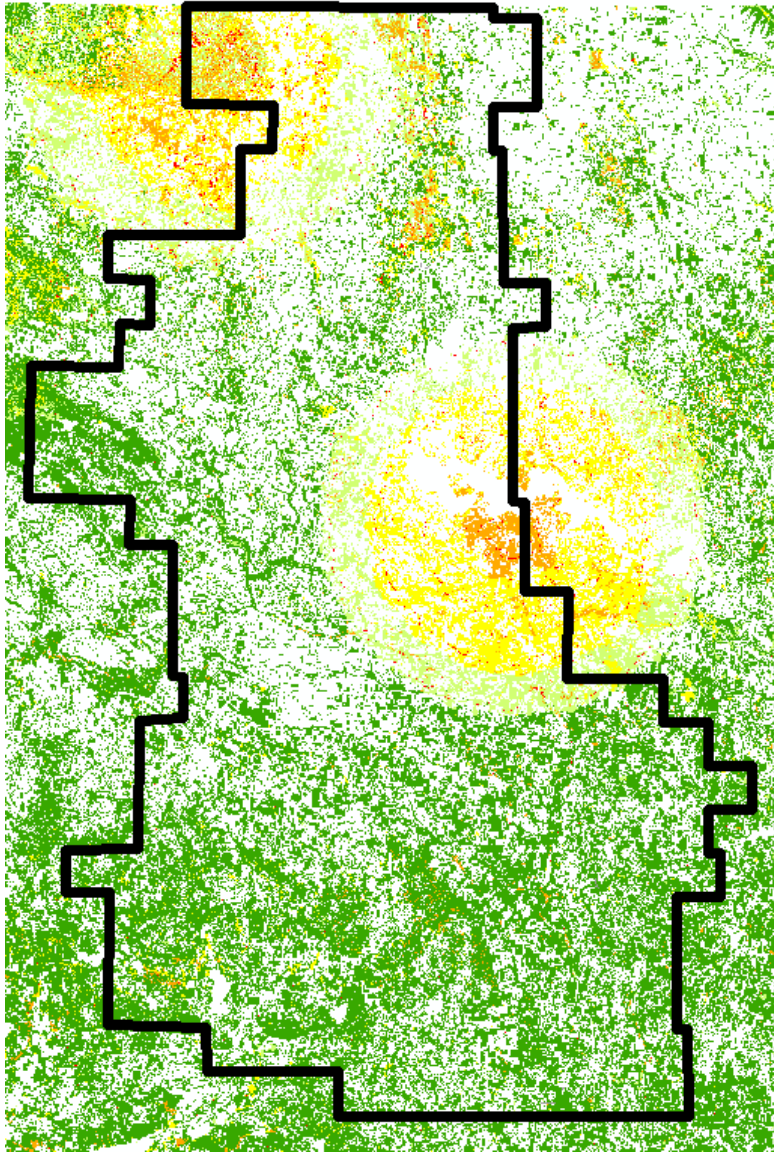


Figure A-1: NPEC Service Territory overlaid on USDA Forest Service Wildfire Likelihood Map

