

State of Washington
Department of Natural Resources
Wildland Fire Management

Washington Electric Utility Wildland Fire Mitigation Plan Template

April 1, 2024

Version 1.0

1.0 Executive Summary

Provide a brief overview of the Wildfire Mitigation Plan (WMP) and the associated material provided to assist the consumers of the information. The below text can be kept and added to, edited, or removed for a utility-specific narrative.

When the Washington Legislature passed [House Bill 1032](#) in July 2023 it stated that, *it is in the best interest of the state, our citizens, and our natural resources to identify the sources of wildland fires; identify and implement best practices to reduce the prevalence and intensity of those wildland fires; put those practices in place; and by putting those practices in place, reduce the risk of wildland fires and damage and losses resulting from those fires.*

The Legislature directed the Department of Natural Resources (DNR), in consultation with the Energy Resilience and Emergency Management Office of the Department of Commerce, to contract with an independent consultant with experience in developing electric utility wildfire mitigation plans to develop an electric utility wildfire mitigation plan format and a list of elements to be included in electric utility wildfire mitigation plans. The Wildfire Mitigation Plan (WMP) format below achieves the direction of the Legislature.

By October 31, 2024, and every three years thereafter, each consumer-owned utility and investor-owned utility must review, if appropriate revise, and adopt its wildfire mitigation plan. When reviewing or revising a wildfire mitigation plan, utilities must use the recommended format and elements contained in the WMP format. The plan must be submitted to the utility wildland fire prevention advisory committee created in RCW 76.04.780 to be posted on their website.

The template and list of elements included were developed in conjunction with the Wildland Fire Prevention Advisory Committee, electric utilities, the state fire marshal, the Governor's Office of Indian Affairs, and the public. The WMP format is intended to function as a guide and provide utilities with suggested elements for their plan which are informed by best practices demonstrated to reduce the prevalence and intensity of wildfires and which reduce the risk of wildfire and the resulting damage and losses.

Each section of the WMP format provides suggested topics, language, and guidance for its completion. This cover letter provides additional guidance to assist utilities in filling out the WMP format with relevant information. It is recognized that each utility faces unique geography, terrain, vegetation, and other characteristics that will present a variety of risk levels and result in unique and tailored approaches to address that risk. To that end, the WMP format has been designed to accommodate a broad range of recommended elements. It is not expected that all utilities will have practices or even a need to complete all sections or elements to the same degree. There are no statutory requirements directing what utilities must include in their plans. It is at the discretion of each utility to determine the elements applicable to its own wildfire mitigation efforts and the level of detail necessary to describe each element.

The WMP format was developed in recognition that some utilities may have wildfire mitigation programs that are more robust than others. It is acceptable to note these limitations when completing the WMP. For any section where a program overlaps two or more elements of the plan, it is acceptable to select the most applicable element to describe the program and reference that section where applicable for other areas. It is not necessary to repeat the program description multiple times.

Please use Appendix A. as needed to provide additional documentation, illustrations, relevant metrics (see examples in template), or other relevant information that does not fit within the WMP format.

In addition to the guidance in this document, an FAQ document will be created and maintained to document frequent questions and feedback. This will be available on the same site where the WMP format resides.

Additional technical assistance is available from the Department of Natural Resources and Washington State Department of Commerce. Contact information is provided below along with information and instructions for submitting completed Plans.

Your participation in this effort and any feedback to its continuous improvement is appreciated.

Submission: Please email your completed Wildfire Mitigation Plan to:

Bryan Perrenod, Secretary, Utility Wildland Fire Prevention Advisory Committee
Bryan.Perrenod@dnr.wa.gov

Contact information

Washington Department of Natural Resources

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DNR Website: <https://www.dnr.wa.gov/>

Wildfire Resources: <https://www.dnr.wa.gov/programs-and-services/wildfire-resources>

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Table of Contents

Section	Page
1.0 Executive Summary	1
2.0 Wildfire Mitigation Plan Overview	1
2.1 Purpose of the Wildfire Mitigation Plan	1
2.2 Description of Where WMP Can be Found Online	1
2.3 Best Practices Cross-Reference Table	1
3.0 Utility Overview.....	2
3.1 Utility Description and Context Setting Table.....	2
4.0 Objectives of the Wildfire Mitigation Plan	4
4.1 Minimizing likelihood of ignition.....	4
4.2 Resiliency of the electric grid	4
5.0 Roles and Responsibilities	4
5.1 Utility Roles and Responsibilities.....	4
5.2 Coordination with local utility and infrastructure providers.....	4
5.3 Coordination with local Tribal entities	4
5.4 Emergency Management / Incident Response Organization	4
6.0 Wildfire Risks and Drivers Associated with Design, Construction, Operation, and Maintenance	5
6.1 Risks and risk drivers associated with topographic and climatological risk factors.....	5
6.2 Enterprise-wide Safety Risks	5
7.0 Wildfire Preventative Strategies	5
7.1 Weather Monitoring	5
7.1.1 Current Strategy Overview	5
7.1.2 Planned Updates	6
7.2 Design and Construction Standards	6
7.2.1 Current Strategy Overview	6
7.2.2 Planned Updates	6
7.3 Fuel & Vegetation Management	6
7.3.1 Current Strategy Overview	6
7.3.2 Planned Updates	6
7.4 Asset Inspections and Response.....	6
7.4.1 Current Strategy Overview	6
7.4.2 Planned Updates	7
7.5 Workforce training.....	7
7.5.1 Current Strategy Overview	7
7.5.2 Planned Updates	7
7.6 Relay and Recloser Practices	7
7.6.1 Current Strategy Overview	7
7.6.2 Planned Updates	7
7.7 De-energization / Public Safety Power Shutoff	7
7.7.1 Current Strategy Overview	7
7.7.2 Planned Updates	7

8.0 Community Outreach and Public Awareness 8

8.1 Current Community Outreach and Public Awareness Program8

8.2 Planned Updates.....8

9.0 Restoration of Service 8

10.0 Evaluating the Plan 8

10.1 Metrics and Assumptions for Measuring Plan Performance.....8

10.2 Identifying and Addressing Areas of Continued Improvement in the Plan9

10.3 Monitoring the Performance of Inspections.....9

Appendix A..... A-1

List of Figures

Figure	Page
No table of figures entries found.	

List of Tables

Table	Page
Table 1. Context-Setting Information Table	2

2.0 Wildfire Mitigation Plan Overview

2.1 Purpose of the Wildfire Mitigation Plan

Sample language for Section 2.1 provided below:

This Wildfire Mitigation Plan describes in detail the range of activities that a Utility or joint Utilities are taking to mitigate the threat of utility involved wildfires, including various programs, policies, and procedures. This plan complies with the requirements of HB1032 for investor and customer owned electric utilities (IOU/COU) to prepare a wildfire mitigation plan by October 31, 2024, and every three years thereafter.

2.2 Description of Where WMP Can be Found Online

Provide a description of how the public and other reviewers can find WMP information online, if available. It is recommended that utilities host their WMP on the utility website in a location that is relatively easy to find and prioritizes the most current and up to date WMP.

2.3 Best Practices Cross-Reference Table

Provide any industry standard or other best practices¹ referenced within the WMP including what section and page number in the form of hyperlinks. Standards that do not have a specific reference within the text but apply to the entirety of the plan can be listed without additional information.

If no industry-wide standards or practices are utilized, this table may be left blank.

Standard or Best Practice Name and Description	Document, page number, or citation
HB 1032 – By October 31, 2024, and every three years thereafter, each Investor-owner and Consumer-owned Utility must review, if appropriate revise, and adopt its wildfire mitigation plan	Sec. XX, pp. XX

¹ Standards may include guidance from FEMA, US Forest Service, NERC regulations, NST, OSHA guidelines, etc.

3.0 Utility Overview

In the following sections, provide an overview of the utility, its service area, and general description of the purpose of the Wildfire Mitigation Plan (WMP).

3.1 Utility Description and Context Setting Table

Provide a brief description of the utility and include the context-setting table. For utilities operating in multiple states, complete the table below only for the areas within Washington state. If any of the information is not tracked, not applicable, or not known, please leave that section blank and provide a summary of the exception.

Note: If two or more utilities are filing jointly, each individual utility will need to provide the following information as well as a combined total. Columns can be added to the right for each individual utility and the furthest left column will contain the “total” or combined data.

Table 1. Context-Setting Information Table

Utility Name	
Service Territory Size (sq miles)	
Service Territory Make-up	<input type="checkbox"/> % Urban <input type="checkbox"/> % Agriculture <input type="checkbox"/> % Barren/Other <input type="checkbox"/> % Conifer Forest <input type="checkbox"/> % Conifer Woodland <input type="checkbox"/> % Desert <input type="checkbox"/> % Hardwood Forest <input type="checkbox"/> % Hardwood Woodland <input type="checkbox"/> % Herbaceous <input type="checkbox"/> % Shrub <input type="checkbox"/> % Water <input type="checkbox"/> NA / Not tracked (please describe below)
Service Territory Wildland Urban Interface (based on total area)	<input type="checkbox"/> % Wildland Urban Interface <input type="checkbox"/> % Wildland Urban Intermix

	<input type="checkbox"/> NA / Not tracked (please add any other detail below)
Customers Served	
Account Demographic <i>[Note: Please provide as a percent of total customers served]</i>	<input type="checkbox"/> % Residential <input type="checkbox"/> % Agricultural <input type="checkbox"/> % Commercial/Industrial <input type="checkbox"/> NA / Not tracked (please add any other detail below)
Utility Equipment Make-up (circuit miles) <i>[Note: Please provide brief description of how line miles are measured or calculated]</i>	Overhead Dist.: Overhead Trans.: Underground Dist.: Underground Trans.:
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?²	Yes <input type="checkbox"/> No <input type="checkbox"/> A summary or description of protocols can be provided in section 7.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, then provide the following data for the three trailing calendar years: Number of shut-off events: [] Customer Accounts that lost service for >10 minutes: [] For prior response, average duration before service restored: []

² For many utilities this will be a reference to a Public Safety Power Shutoff (PSPS) event. These events, whether through a formally defined PSPS program or not, are recognized as a safety measure of last resort initiated by utilities to pre-emptively de-energize specific powerlines during critical fire weather to reduce the risk of the electric system being involved in an ignition. The decision to either have or not have this type of practice is at the operational discretion of the individual utility.

4.0 Objectives of the Wildfire Mitigation Plan

In this section, please state the objectives of the mitigation plan and how each objective supports a response and recovery system that is focused on public safety.

For any section where a program overlaps two or more elements of the plan, it is acceptable to select the most applicable element to describe the program and reference that section where applicable for other areas. It is not necessary to repeat the program description multiple times.

4.1 Minimizing likelihood of ignition

Describe steps taken to reduce likelihood of ignitions from energized equipment.

4.2 Resiliency of the electric grid

Describe the utility's ability to withstand fire weather conditions and quickly recover services.

5.0 Roles and Responsibilities

Provide within these sections an organizational overview of the utility and wildfire management or response personnel, coordination efforts with other local utilities and infrastructure providers, and any currently obligated or voluntary emergency management communication efforts. It is up to the discretion of each utility to determine the specific needs of the communities they serve and how best to prepare for any emergency situation, including wildfire.

5.1 Utility Roles and Responsibilities

Please provide a utility wildfire program organizational chart highlighting the wildfire specific staff/positions within the utility. The utility should also provide a detailed description of the wildfire specific roles within the utility and the responsibilities of said roles.

5.2 Coordination with local utility and infrastructure providers

Describe any coordination and communication involving other local utilities and infrastructure providers which are essential to wildfire response and recovery (e.g., water utilities, gas utilities, phone/cable/internet providers, local emergency management and first responders).

5.3 Coordination with local Tribal entities

Describe any coordination with adjacent Tribes that may be impacted or have emergency response needs in the event of a wildfire scenario.

5.4 Emergency Management / Incident Response Organization

Describe utility's efforts (if any) to coordinate with relevant safety agencies as well as other relevant local and state agencies to establish roles, responsibilities, and structure of communication for emergency management system alerts. Coordination efforts may include but are not limited to:

- *Emergency management system structure during red flag conditions and wildfires*
- *Relevant training exercises the utility may participate in relating to red flag conditions and wildfires*

(It is recommended as a best practice that utilities adopt or adapt an industry recognized Incident Management System as a guide).

6.0 Wildfire Risks and Drivers Associated with Design, Construction, Operation, and Maintenance

Within these sections, provide any specific information regarding the risks and risk drivers specific to the utility service territory and surrounding areas as well as enterprise-wide safety risks.

6.1 Risks and risk drivers associated with topographic and climatological risk factors

List primary risk drivers for wildfires specific to the utility service area and briefly describe the utility's prioritization of stated risks (what is most important in a service area), and what climate conditions or geographic characteristics the utility's wildfire mitigation strategy incorporates. Example risk drivers may include:

- *Extended drought;*
- *Vegetation type;*
- *High winds;*
- *Steep terrain;*
- *Lack of early fall rains*

6.2 Enterprise-wide Safety Risks

Describe the utility's methodology for identifying and assessing enterprise-wide safety risks related to wildfires.

Risk areas may include:

- *Operational*
- *Procedural*
- *System Sensitivities*

Example risk drivers may include:

- *Contact from Object (i.e., animal, balloon, vegetation, vehicle);*
- *Equipment / Facility Failure (i.e., Capacitor Bank, Conductor, Crossarm, Fuse, Insulator, Transformer, etc.);*
- *Wire to Wire Contact*

7.0 Wildfire Preventative Strategies

Within these sections, provide any specific information regarding current prevention strategies, lessons learned from the prevention activities, and considerations for the future state.

7.1 Weather Monitoring

7.1.1 Current Strategy Overview

Provide details on weather monitoring (if any) conducted by the utility.

The following is a list of possible weather monitoring sources:

- *United States National Weather Service*
- *United States Forest Service Wildland Fire Assessment System*
- *National Fire Danger Rating System*

7.1.2 Planned Updates

Describe changes (if any) to weather monitoring that are anticipated in the upcoming three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented. If it is a pilot program, describe the pilot period.

7.2 Design and Construction Standards

7.2.1 Current Strategy Overview

Detail any instances where the utility is engaged in system re-design and hardening practices or other efforts for purposes of wildfire mitigation. If any industry best practices are being utilized, note the standard or code, as applicable, and how the utility achieves that standard in its processes.

7.2.2 Planned Updates

Describe any changes to design and construction standards that are anticipated in the upcoming three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

7.3 Fuel & Vegetation Management

7.3.1 Current Strategy Overview

Detail any instances where the utility has or is developing or implementing programs and practices to manage fuels and vegetation for purposes of wildfire mitigation. If any industry standards are used as a baseline for Vegetation Management, please cite and briefly describe the standard(s).

7.3.2 Planned Updates

Describe changes to the utility's vegetation management practices (if any) that are anticipated in the upcoming three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

7.4 Asset Inspections and Response

7.4.1 Current Strategy Overview

Detail any instances where the utility is engaged in inspection practices or pilot projects (e.g., use of LiDAR, infrared, drones, etc.) for purposes of wildfire mitigation. For any inspection program descriptions, include detail on remediation practices. If industry standards are used as a basis for inspections, please cite and briefly describe the standard(s).

7.4.2 Planned Updates

Describe any changes to the utility's inspection program that are anticipated in the next three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

7.5 Workforce training

7.5.1 Current Strategy Overview

Describe any wildfire mitigation related workforce training or work rules/practices.

7.5.2 Planned Updates

Describe any changes to workforce training efforts that are anticipated in the next three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

7.6 Relay and Recloser Practices

7.6.1 Current Strategy Overview

Describe the utility's associated protective devices and relay practices, including the use of pulse reclosers and other programmable controlled reclosers. Additionally, describe if the utility changes relay settings to more quickly or easily de-energize a circuit during certain conditions.

7.6.2 Planned Updates

Describe any changes to relay or recloser operations that are anticipated in the next three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

7.7 De-energization / Public Safety Power Shutoff

7.7.1 Current Strategy Overview

Provide information about plans (if any) to proactively de-energize as it pertains to wildfire mitigation, this can include, but is not limited to Public Safety Power Shutoff guidelines. Summarize the conditions (if any) under which the utility may de-energize to prevent ignitions. Describe the protocols the utility would utilize when determining the appropriateness of proactive de-energization.

If a utility does not plan on enacting proactive de-energization, please list other mitigation strategies to limit asset related ignitions under critical fire weather conditions. Additionally, utilities describe notification protocols and procedures ahead of, during, and following a proactive de-energization.

Detail on restoration of service following a de-energization can be provided in Section 9.

7.7.2 Planned Updates

Describe any changes to the de-energization strategy or program that are anticipated in the next three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

8.0 Community Outreach and Public Awareness

8.1 Current Community Outreach and Public Awareness Program

Provide a description of customer communication efforts or programs related to wildfire mitigation performed over the past three years. If any evaluations or assessments of customer communications were performed, briefly describe the findings as appropriate. This may include efforts to increase awareness that a WMP exists, notification of activities under the WMP, etc. If the Utility utilizes proactive de-energization (or PSPS) protocols, this section may be used to describe any efforts made to educate or interact with the public regarding customer awareness of the utility's protocols.

Examples may include, but are not limited to, interaction with the Fire Adapted Communities Learning Network, initiatives to reach customers with limited English proficiency, or interagency meetings to promote best management practices. Examples of evaluations may include number of impressions, customers reached, or resources provided/requested.

8.2 Planned Updates

Describe any changes to customer communication and public awareness strategies or programs that are anticipated in the next three years. If applicable, describe what led to the change and the anticipated benefit or improvement once implemented.

9.0 Restoration of Service

Within this section, provide the detailed process for restoring service after an outage as outlined by the utility during high wildfire risk conditions or following a de-energization or wildfire event. When applicable, reference specific sections within the utility's restoration plan (if available) that detail the utility's protocols before during and after restoration.³

10.0 Evaluating the Plan

Within these sections, provide information on how the utility tracks and evaluates the performance of its wildfire mitigation plan and the associated mitigation efforts. If this is an initial WMP submission, some sections may not apply or have any historical context. In such cases, the section can be used to describe future states if such information is known. If leaving blank, please indicate that the information is not yet available.

10.1 Metrics and Assumptions for Measuring Plan Performance

Provide metrics that are relevant to the utility's wildfire mitigation efforts described in the WMP and that measure or benchmark the utility's performance on such mitigation efforts. If desired, full metrics or tracking can be attached in the Appendix.

³ The State Energy Office – Energy Emergency Management is available to support development and assessment of restoration activities or assist with any questions or concerns.

10.2 Identifying and Addressing Areas of Continued Improvement in the Plan

When applicable, describe adjustments, improvements, or additions to the plan derived from established metrics including, lessons learned, or any other processes contributing to continuous improvement efforts.

10.3 Monitoring the Performance of Inspections

Describe processes for monitoring the performance of inspections, including inspections performed by contractors. This section may include any assurance or control protocols for reviewing inspection quality.

Appendix A.

Appendix A provides the Utility with the opportunity to add metrics tables, including:

External Risk Metrics:

- Red Flag Warning days
- High Wind Warning days
- Increases to customers in high-risk areas (as identified by utility)

Performance Metrics:

- Distribution Inspections (Inspection Type if Applicable)
 - Circuit Miles Inspected
 - Count of Inspection Findings
- Transmission Inspections (Inspection Type if Applicable)
 - Circuit Miles Inspected
 - Count Inspection Findings
- Vegetation Inspections (Inspection Type if Applicable)
 - Circuit Miles Inspected
 - Count Inspection Findings

Outage Metrics:

- Distribution:
 - Utility Identified Outage Case
- Transmission:
 - Utility Identified Outage Case