

RESOLUTION NO. 24-05

A Resolution Approving the District's Wildfire Mitigation Plan (WMP)

WHEREAS, in July 2023, the Washington State Legislature passed House Bill 1032 requiring utilities adopt Wildfire Mitigation Plans, and

WHEREAS, the District has compiled its existing procedures into the format recommended by the Department of Natural Resources to produce a comprehensive Wildfire Mitigation Plan.

NOW THEREFORE BE IT RESOLVED that the Board of Commissioners of Public Utility District No. 1 of Ferry County adopt and recognize the attached Wildfire Mitigation Plan (Rev. 08.23.24) and so approve it to be published and submitted as required by RCW 76.04.780.

ADOPTED at the regular meeting of the Board of Commissioners of Public Utility District No. 1 of Ferry County, Washington, this 16th day of September, 2024.



BOARD OF COMMISSIONERS
PUBLIC UTILITY DISTRICT NO. ONE
OF FERRY COUNTY, WASHINGTON

Chris Koupa

President

[Signature]

Vice-President

ATTEST:

[Signature]

Secretary

PUD No. 1 of Ferry County
Operations Department
Wildland Fire Management

PUD No. 1 of Ferry County Fire Mitigation Plan

August 23, 2024

Revision: 08.23.24

Table of Contents

Section

1.0 Executive Summary

2.0 Wildfire Mitigation Plan Overview

- 2.1 Purpose of the Wildfire Mitigation Plan
- 2.2 Description of Where WMP Can be Found Online
- 2.3 Best Practices Cross-Reference Table

3.0 Utility Overview

- 3.1 Utility Description and Context Setting Table

4.0 Objectives of the Wildfire Mitigation Plan

- 4.1 Minimizing likelihood of ignition
- 4.2 Resiliency of the electric grid

5.0 Roles and Responsibilities

- 5.1 Utility Roles and Responsibilities
- 5.2 Coordination with local utility and infrastructure providers
- 5.3 Coordination with local Tribal entities
- 5.4 Emergency Management / Incident Response Organization

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

- 6.1 Risks and risk drivers associated with topographic and climatological risk factors
- 6.2 System-wide Safety Risks

7.0 Wildfire Preventative Strategies

- 7.1 Weather Monitoring
- 7.2 Design and Construction Standards
- 7.3 Fuel & Vegetation Management
- 7.4 Asset Inspections and Response
- 7.5 Workforce training
- 7.6 Relay and Recloser Practices
- 7.7 De-energization / Public Safety Power Shutoff

8.0 Community Outreach and Public Awareness

- 8.1 Current Community Outreach and Public Awareness Program

9.0 Restoration of Service

10.0 Evaluating the Plan

- 10.1 Metrics and Assumptions for Measuring Plan Performance
- 10.2 Identifying and Addressing Areas of Continued Improvement in the Plan
- 10.3 Monitoring the Performance of Inspections

1.0 Executive Summary

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.

2.0 Wildfire Mitigation Plan Overview

2.1 Purpose of the Wildfire Mitigation Plan

This Wildfire Mitigation Plan describes in detail the range of activities that PUD No. 1 of Ferry County is taking to mitigate the threat of utility involved wildfires, including various programs, policies, and procedures. This plan complies with the requirements of HB1032 for customer owned electric utilities 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

<https://fcpud.com/wildfire-mitigation-plan>

2.3 Best Practices Cross-Reference Table

| 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 | Executive Summary. Pg. 3 of 4 |

3.0 Utility Overview

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

Table 1. Context-Setting Information Table

| | |
|--|--|
| Utility Name: PUD No. 1 of Ferry County | |
| Service Territory Size (2,509 sq miles) | |
| Service Territory Make-up As percentage of sq. miles. | Water 2% Grass/Shrub 18% Woodland 80% Conifer 85% Deciduous 15% Urban 1% Wildland/Rural 99% |
| | |

4.0 Objectives of the Wildfire Mitigation Plan

4.1 Minimizing likelihood of ignition

Vegetation management trim cycles are approximately 10 years. Our full-time in-house tree trimmers mitigate danger and priority vegetation encroachments as needed. The system is also inspected during annual pole testing that thoroughly examines approximately 10% of the system. System inspections also identify vegetation and maintenance needs.

4.2 Resiliency of the electric grid

The District has progressively hardened our system against fire ignition and damage through active vegetation management programs. The District employs one full time crew of Line Clearance Tree Trimmers, and in 2024 added another apprentice to that crew.

Our Crews have extensive experience suppressing fire. They are equipped with fire extinguishers, pressurized water tanks, shovels, Pulaski's and grubbing adzes. The District has a 150 gallon pumper truck that is available and used on job sites throughout fire season. Our crews coordinate with DNR to protect utility infrastructure including BPA transmission circuits.

It is the policy of the District that all new line extensions be placed underground, unless the amount of rock makes it impractical.

Herbicides are used as needed, including sterilization of substation sites and remote equipment installations.

5.0 Roles and Responsibilities

County or Tribal Emergency Management are the lead agencies during fire events. Our crews are directed by the District's Operations Manager (Superintendent) who coordinates with the involved agencies and makes operational determinations, directing resources and personnel. The District is a joint signatory to the State-wide, PUD Mutual Aid program. Member utilities make available their crews and equipment to assist in emergency power restorations, and when needed can request resources from any PUDs within Washington State.

5.1 Utility Roles and Responsibilities

The District does not have wildfire specific staff, but all staff has a role in mitigation, suppression or restoration processes.

Line crew – Identification during inspections, mitigation through vegetation removal (secondary role), restoration of systems (primary role), active suppression and structure protection during events.

Tree crew - Identification during inspections, mitigation through vegetation removal (primary role), assistance during restoration of systems, active suppression and structure protection during events.

Operations Manager – Initiates and documents all maintenance and inspection cycles, including vegetation management, pole testing, system inspections, equipment maintenance and herbicide applications. Incident Manager - Directs District personnel during emergency events and coordinates with involved agencies.

Support staff – Used to move supplies, equipment and food as needed.

5.2 Coordination with local utility and infrastructure providers

The Operations Manager is the lead coordinator for the District during incidents. He initiates communications on behalf of the District, with other affected providers, and when requesting restoration resources.

5.3 Coordination with local Tribal entities

The South half of Ferry County is on the Colville Indian Reservation. Tribal Emergency Management is the lead incident management coordinator for incidents on Indian Lands and coordinates their firefighting and mitigation efforts with our Operations Manager.

5.4 Emergency Management / Incident Response Organization

PUD No. 1 of Ferry County uses FEMA's NIMS (National Incident Management System) as a reference for our Incident Response System.

ICC – Customer Service personnel dispatch crews as part of regular business and form the core of the Incident Command Center during active incidents.

IC – Incident Command is the responsibility of the Operations Manager. If not available, the General Manager will assume the role. The District IC coordinates with other agency leads, coordinates all resource allocation (including mutual aid requests), and directs labor resources within the utility.

- The District coordinates directly with DNR during fire events and plans to schedule joint training with them in the future.*
- County Emergency Management leads coordination meetings during events, and during high risk weather. The District is an active stakeholder during those meetings.*
- The District participates in the Washington Department of Commerce, "Utility Coordination Call" that is routinely held during fire season.*
- All crews are supplied with phones, pagers, water cans, fire extinguishers, shovels, a pulaski and a grubbing adze. Fire danger, red flag warnings, IFPL levels and relevant local and State warning data are instantly accessible to all employees through their company phones and extended network access through FirstNet.*

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

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

Primary risk drivers for Public Utility District No. 1 of Ferry County are Extended drought, Vegetation type, High winds, Steep terrain and Lack of early fall rains.

6.2 System-wide Safety Risks

The District's methodology for identifying and assessing system-wide safety risks related to wildfires.

- *Operational: System inspections identify vegetation encroachment, deficient hardware and construction that needs updated. Pole testing identifies poles and hardware needing replaced. Right-of-Way clearing cycles remedy encroaching vegetation and identify other system repair needs.*
- *Procedural: Operations manager uses outage reports, and breaker operation logs to identify potential vegetation, or animal contact problems. Customer service generates repair work "Service Orders" from customer reporting.*

Risk Drivers:

- *Contact from Object (animal, vegetation, vehicle);*
- *Equipment / Facility Failure (Porcelain Cutouts, Conductor, Crossarm, Fuse, Insulator, Transformer, etc.);*
- *Wire to Wire Contact.*

7.0 Wildfire Preventative Strategies

7.1 Weather Monitoring

7.1.1 Current Strategy Overview

The District does not staff subject matter experts to forecast fire weather condition and warnings. We rely on existing external resources for forecasting as noted below, including our power supplier.

- *Bonneville Power Administration – Account Executive*
- *United States Forest Service Wildland Fire Assessment System*
- *DNR IFPL Levels (dnr.wa.gov/ifpl)*
- *NOAA (weather.gov – red flag warnings and weather hazards)*

7.1.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

7.2 Design and Construction Standards

7.2.1 Current Strategy Overview

Policy and procedural changes favor underground construction.

Maintenance to replace overhead with underground, when practical.

6 ft. neutral spacing.

Avian guards / deterrents.

7.2.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

7.3 Fuel & Vegetation Management

7.3.1 Current Strategy Overview

The District employs a full time crew of line clearance tree trimmers and has added an apprentice to that crew in 2024. Circuit trimming is performed after all danger and priority removals are complete. Cycle expectations & modifications are initiated by the Operations Manager. Mechanical removal of brush and small trees is contracted on an as-needed basis.

STANDARDS:

RCW 64.12.035 – Contacting and imminent danger tree removal.

NESC – Best practice, clearance requirements

RUS – Bulletin 1728F-804 section m – right-of-way specification guide.

7.3.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

7.4 Asset Inspections and Response

7.4.1 Current Strategy Overview

The District owns an inspection drone but currently does not have a qualified pilot. Engineering and operations personnel partner to perform asset inspections. Findings are turned into work orders by the engineering department. The District uses a Fluke, FLIR imaging device and inspects high value equipment annually.

7.4.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

7.5 Workforce training

7.5.1 Current Strategy Overview

Employees who serve, or have served on the volunteer fire department, have received wildland fire training. Those without fire department experience receive on the job task training and safety training.

7.5.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

7.6 Relay and Recloser Practices

7.6.1 Current Strategy Overview

Most of our systems' over-current protection devices are hydraulic reclosers. These devices are capable of a "non-reclose" function. We have used this feature during past fire-seasons but saw no reduction in incidents. If reducing breaker operations eliminated ignition incidents, "Public Safety Power Shutoff" (PSPS) procedures would not exist.

7.6.2 Planned Updates

The District is in the process of phasing out its hydraulic reclosers in favor of programable vacuum interrupted devices. These devices will allow more flexibility in programming faster time current curves.

7.7 De-energization / Public Safety Power Shutoff

7.7.1 Current Strategy Overview

In coordination with, or at the request of County Emergency Management, the District may de-energize lines due to forecasted wind events (during times of extreme fire danger).

To ensure rural customers have the ability to pump water, the District does not schedule power outages during fire season.

The District will receive requests from Local, State and Federal agencies, to proactively shut off lines and systems. These requests will be approved on a case by case basis by the Operations Manager.

7.7.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

8.0 Community Outreach and Public Awareness

8.1 Current Community Outreach and Public Awareness Program

Public Utility District No. 1 of Ferry County is a small, rural distribution utility, with customers that are actively engaged in local conversations. Our programs and efforts are public information and published in the local paper through our commission meeting summary.

8.2 Planned Updates

No planned updates at this time, but the District is forward thinking, adaptable and motivated to learn and improve systems as needed.

9.0 Restoration of Service

Refer to the Districts “Emergency Restoration Plan” located online at:

<https://fcpud.com/emergency-restoration-plan>

10.0 Evaluating the Plan

10.1 Metrics and Assumptions for Measuring Plan Performance

The District tracks vegetation caused power outages to measure the efficacy of line clearance tree trimming efforts. A trending reduction in outage occurrences has been realized since the District started its own Tree Trimming program and stopped using contractors.

10.2 Identifying and Addressing Areas of Continued Improvement in the Plan

Currently there is not enough data to evaluate any established metrics or discuss adjustments, improvements, or additions needed to this WMP. This plan will be reviewed and improved as lessons are learned from continuous improvement efforts.

10.3 Monitoring the Performance of Inspections

System inspections and vegetation maintenance are performed by utility employees. The tasks accomplished from these programs are reviewed by the Operations Manager and feedback is given to those employees. If the work is incomplete or inadequate it is sent back to the crew to be finished or fixed.

The District uses a contractor to inspect poles. The line crew replacing reject poles performs an initial inspection for accuracy. If there are any doubts a supervisor will dissect the pole and communicate those results with the contractor.

Appendix A. will be added in the future, if needed to provide additional documentation, illustrations, relevant metrics, 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

Loren Torgerson, Chair, Utility Wildland Fire Prevention Advisory Committee
Loren.Torgerson@dnr.wa.gov

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

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

Washington State Department of Commerce

Eli King, Director, Energy Resilience & Emergency Management Office
Elizabeth.King@commerce.wa.gov

Johanna Hanson, Wildfire Mitigation Technical Assistance
Operations Manager, Energy Resilience and Emergency Management Office
Johanna.Hanson@commerce.wa.gov

Dept. of Commerce Website: <https://www.commerce.wa.gov/>