Wildfire Mitigation Plan

For

Modern Electric Water Co.

Spokane Valley, WA

October 2024

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0.0 Definitions

WMP (Wildfire Mitigation Plan) – This document as described further in Section 1.0

WUI (Wildland Urban Interface) Terms –

Wildland: Those areas without any structures or human development that also have more than 50% burnable vegetative cover.

Urban: Those areas with both dense human development as well as less than 50% vegetative (wildland) cover, typically noted by their high density of structures.

Intermix: Wildland-Urban Intermix are those areas where structures intermingle with wildlands. To be considered Intermix, a development or structure must be surrounded on two or more sides by wildlands.

Interface: Those areas where human development meets areas that are covered with more than 50% wildlands. To be considered Interface, development or structures must be bordered by wildlands on at least one side.

DNR – Washington State Department of Natural Resources

PSPS (Public Safety Power Shutdown) – The intentional de-energization of electric distribution circuits intended to eliminate the risk of fires started by utility systems during specific weather conditions (typically hot, arid, windy)

Good Utility Practice – Any of the practices, methods and acts engaged in or approved by a significant portion of the electric utility industry during the relevant time period, or any of the practices, methods and acts which, in the exercise of reasonable judgment in light of the facts known at the time the decision was made, could have been expected to accomplish the desired result of the lowest reasonable cost consistent with good business practices, reliability, safety and expedition. Good Utility Practice is not intended to be limited to the optimum practice, method or act to the exclusion of all others, but rather to be acceptable practices, methods, or acts generally accepted in the region and consistently adhered to by similar entities under similar circumstances.

RED FLAG WARNING – The National Weather Service issues Red Flag Warnings & Fire Weather Watches to alert fire departments of the onset, or possible onset, of critical weather and dry conditions that could lead to rapid or dramatic increases in wildfire activity. A Red Flag Warning is issued for weather events which may result in extreme fire behavior that will occur within 24 hours. A Fire Weather Watch is issued when weather conditions could exist in the next 12-72 hours. A Red Flag Warning is the highest alert. During these times extreme caution is urged by all residents, because a simple spark can cause a wildfire. A Fire Weather Watch is one level below a warning, but fire danger is still high. The type of weather patterns that can cause a watch or warning include low relative humidity, strong winds, dry fuels, the possibility of dry lightning strikes, or any combination of the above. During heightened fire danger, most Fire Protection Districts will place additional firefighters on duty, staff more fire engines and keep more equipment on 24 hours a day to be able to respond to any new fires.

1.0 Executive Summary

Due to recent Washington State legislation, specifically HB 1032 (2023-24), which then modifies or adds to existing state legislation applicable to Modern Electric Water Company, specifically RCW 19.29A.170, electric utilities must adopt their own wildfire mitigation plan (WMP). WMP's are intended to mitigate the risk of wildfires through electric utility planning and identification of best practices appropriate to each utility's circumstances. These mitigation plans must use the recommended format and elements established in the aforementioned legislation and its stood-up advisory board, and the governing board of consumer-owned utilities (such as Modern's BOD) must review the plan. The guidance established in the suggested plan format allows for utility-specific policy and practices suited for the differences amongst each utility's service territory, customer base and functional organization. Because of Modern's unique characteristics (extremely small and homogeneous geographic service territory, operational organization, historical disaster experience, governance, etc....), this recently-developed mitigation plan and accompanying recommendations are not expected to appreciably impact Modern's operational, budgetary or design/construction practices, nor the experiences of Modern's customers. Notable changes might be through increased visibility of Modern's documented policies/practices and through increased communications with outside stake-holders (customers, regulatory/governing bodies, public safety agencies, press and public).

Once reviewed and adopted internally, the legislation requires Modern to provide a copy of its plan to the department of natural resources (WA State DNR). Consumer-owned utilities must adopt their plan by October 31st, 2024, and must review and/or revise the plan every three years thereafter.

1.1 From DNR…

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.

Submission: Modern to email 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

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2.0 Wildfire Mitigation Plan Overview

2.1 Purpose of the Wildfire Mitigation Plan

This WMP (Wildfire Mitigation Plan) describes the range of activities that Modern Electric Water Company 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 investor- and customer-owned electric utilities (IOU/COU) to prepare and adopt a wildfire mitigation plan by October 31st, 2024, and review it 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.

Once developed, reviewed and adopted, Modern will make the plan available to the various audiences dictated in the legislation and will provide a copy to the department of natural resources (WA State DNR) and to the utility wildland fire prevention advisory committee. Additionally, Modern Electric will post the plan's accessibility information on its website (below).

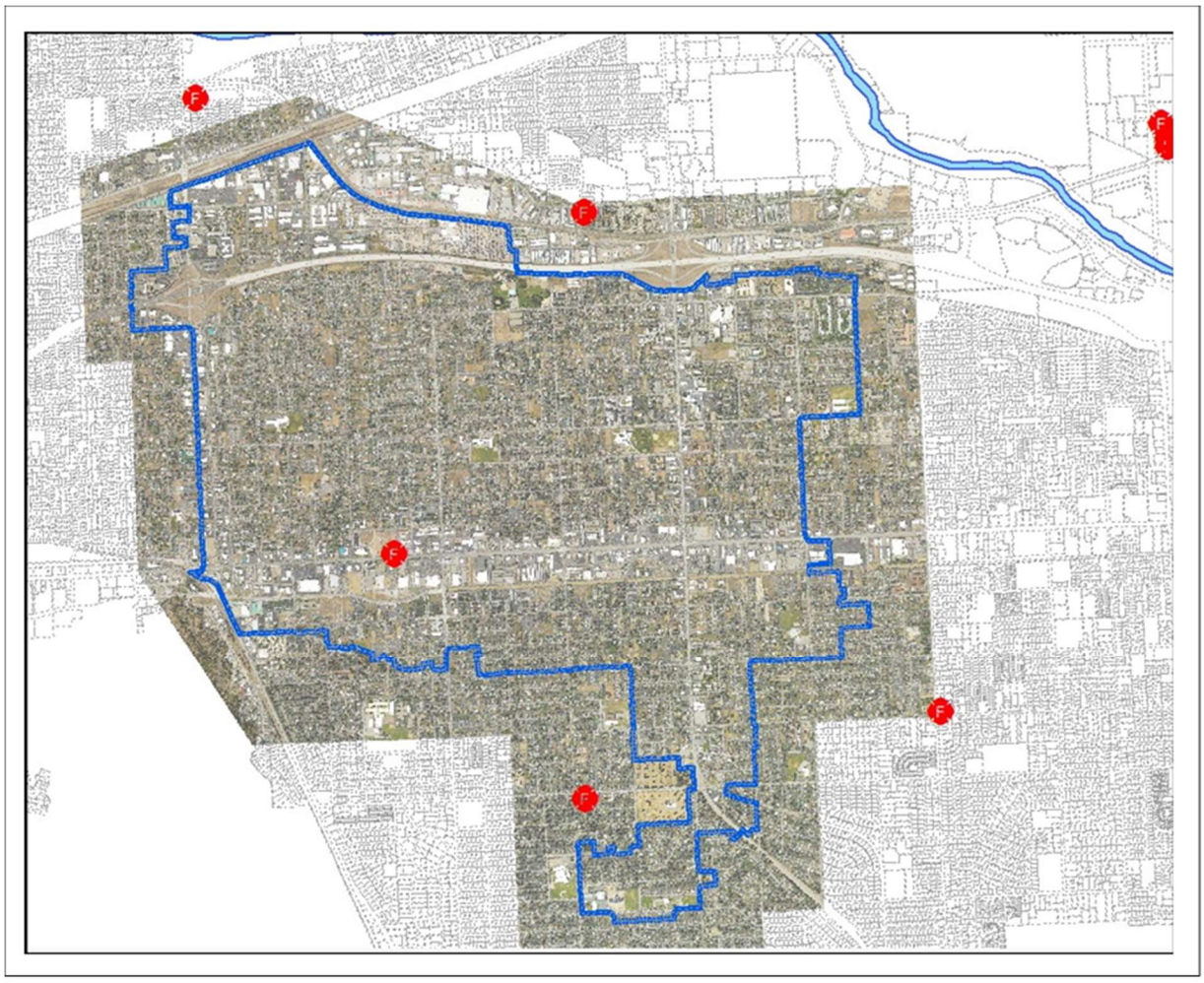
(URL: www.modernelectricwater.com)

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).

Formally established in 1905 to develop and market irrigated farmland, Modern Electric Water Company's (Modern's) approximately 3000 original acres still define the area served by the company's water and electric distribution system. However, the formerly-agrarian land was overtaken by residential and commercial development during the post-WWII building boom. Today, Modern serves nearly 11,000 electric meters and close to 6,000 water meters within this dense five (5) square mile service territory.

Modern's territory is comprised of mostly urban/residential properties (small residential lots w/ irrigated lawns mixed with some deciduous and conifer trees) as well as urban/commercial corridors (asphalt roadways and parking lots w/ irrigated landscaping). (See image below)



Aerial Image of Modern's Service Territory w/ Fire Station Locations

[Of Note: The daily water pumping difference within Modern's service territory between winter and summer months averages over 10M gallons, indicating the application of over 3000 gallons of water per acre per day (presumptively used mainly for irrigation).]

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.

Table 1. Context-Setting Information Table

Utility Name	Modern Electric Water Company
Service Territory Size (sq miles)	5 (sq miles)
Service Territory Make-up	98% Urban 2% Barren/Other
Service Territory Wildland Urban Interface (based on total area)	0% Wildland Urban Interface 0% Wildland Urban Intermix
Customers Served	10,900
Account Demographic *[Provide as a percent of total customers served]*	85% Residential 15% Commercial/Industrial
Utility Equipment Make-up (circuit miles) [*Note: Provide brief description of how line miles are measured or calculated*]	Overhead Dist.: 75 miles Overhead Trans.: 0.6 mile Underground Dist.: 22 miles Underground Trans.: n/a
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?[1]	Yes ☐ No X (A summary description is provided in Section 7.)
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	Yes ☐ No X

[1] 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.

The main objective of the WMP is to codify Modern's policies and practices in reducing the chance of utility-caused wildfires. Following Good Utility Practice(s), any and all of the suggested informational/educational/maintenance-based, operational or other actions that reduce wildfire risk also reduce outages, damage and other reliability-based, system-wide, or customer-experience issues. These are on-going practices and efforts which already take place, only now documented in this format (WMP) for this audience.

4.1 Minimizing likelihood of ignition

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

Any un-intended diversion of electricity outside of or away from a nominal utility system component has the potential to cause damage, including the creation of a spark, heat or other incendiary condition. So, it goes without saying, that most common utility maintenance, eqpt/structure hardening and visibility/monitoring actions specific to wildfire reduction causes are already part of Modern's historical and on-going operations and procedures. Nonetheless, adoption of the WMP (this document) serves to re-enforce Modern's current, long-standing practice of system operation and maintenance that ultimately provides safe, reliable energy to its customers and the community at large (albeit nothing new).

During Red Flag Warning events, Modern will evaluate placing circuit reclosers on alternate sensitivity settings or non-reclose status as well as direct crews to patrol and inspect lines in the event of circuit lock-out events until conditions are downgraded and safe for the community.

[Note: In this evaluation, Modern will consider the effect that reduced reliability of maintaining electrical energy to its customers might have such as the loss of electricity to operate heating/cooling/HVAC and refrigeration, traffic signals, cross walks, public safety signaling, communication and information systems, elevators/lifts, access/entry systems, battery charging, water pumping, and other life-safety equipment.]

4.2 Resiliency of the electric grid

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

Modern's system has several characteristics that help it to withstand fire weather conditions and quickly recover services – service territory size, urban-like make-up, feeder location along major road-way corridors (allows easy access for inspection and repair), system capacity and topology allows switching between source locations allowing for quicker restoration if adjacent source/circuit is compromised, etc.

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.

Modern's small size and staffing configuration allow for efficient operation and dispatch year-round. During storms and other emergency situations, such as during a wildfire event, employees shift to a heightened level of availability and, if needed, response as directed by Modern's operational and administrative management. Development, planning and implementation of policies and procedures as well as all internal and external communications are carried out by the same operational and administrative management staff, reducing overlap and uncertainty.

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.

- CEO – Oversees WMP implementation and recommendations to the Board of Directors, news media liaison
- Engineering Manager –WMP development and overall systems operation and actions
- Engineer – Assistance w/ overall systems operation, weather and SCADA monitoring, and data production
- Electric Superintendent – Electric facility oversight and personnel coordination
- Water Superintendent – Water facility oversight and personnel coordination
- Government Relations and Communications Coordinator – Customer, website and social media information
- GIS Analyst – Maps & records development, data production, and communication tools assistance

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).

As a purveyor of both electricity AND water, Modern Electric Water Company has operational and managerial oversight of the source of energy *distribution* as well as the source of water pumping, storage and distribution to our service territory. This affords a very high level of coordination to respond to any wildfire situation.

Additionally, Modern has existing operational protocols and procedures to coordinate with applicable external entities such as:

- Avista Utilities (AVA)
- Vera Water and Power

- Inland Power & Light
- Bonneville Power Administration (BPA)
- Spokane Valley Fire Dept. (SVFD 1)
- Spokane Valley Police Dept. (Spokane County Sheriff – Valley Precinct)
- City of Spokane Valley (CoSV)
- Spokane County Emergency Management
- WA State Dept. of Commerce, Energy Resilience & Emergency Management Office (EREMO)
- WA State Department of Health (DOH).

5.3 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.

Modern monitors activity and coordinates actions with the governmental agencies and regional partner-utilities listed above.

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.

Modern's service territory is small (5 square miles), highly-developed and well-established (as detailed in Section 3).

Climatological risk factors might be due to the effect of extended drought and higher-than-normal winds on the vegetation of individual private property lots within Modern's service territory.

Topographic risk factors are known due to the fact that development in Modern's service territory is limited to in-fill of existing, established parcels – Modern's service area is fixed at its present boundaries.

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*

Modern continually evaluates risks and areas for improvement on an enterprise-level (company-wide) basis. Identification of risk factors and associated improvements are on-going and may be informed by the development of and incorporated into future edits of this WMP.

Long-standing operational procedures exist to pre-emptively identify and/or respond to heightened emergency events (such as fires):

- Annual/on-going pole and system inspections
- 24/7 customer notifications and on-call responses
- Automatic SCADA monitoring and alarming
- Communications, notifications and information sharing methods

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.

Weather monitoring is possibly the highest used metric to knowing how an electric and water system 'behaves' and the usage levels which are experienced. Modern has highly ingrained procedures and resources for monitoring current conditions as well as forecasted weather. These include:

- SCADA (including hosted weather sensors, video and other system/sensor metrics)
- E-mail/list-serve participation
- Weather websites
- Wildfire incident map websites
- National Weather Service notifications (NOAA)

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.

There are no planned changes to Modern's current monitoring procedures.

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.

Design standards and specifications are similar, but vary from electric utility to electric utility. Following Good Utility Practice and monitoring industry trends, Modern has shifted portions of its standard construction specification which could be considered 'grid hardening'. These include:

- Use of fiberglass cross-arms
- Changing out porcelain insulators and switches to polymer type
- Connector inspection and/or tightening
- Wildlife guard and 'linehose' installation and replacement

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.

There are no planned changes to design and construction standards. Standards are generally reviewed as needed with industry improvements and within a three-year cycle corresponding with this WMP.

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).

Historically, Modern has patrolled for, identified, notified and performed extensive tree-trimming of its entire service territory annually – both with internal staff and 3rd party contractors. Currently, GIS mapping is used to identify and address the areas and properties on which the company or its contractor will perform vegetative line clearing.

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.

There are no planned changes to Modern's vegetation management practices within the initial three-year cycle corresponding with this WMP.

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).

As noted above (Section 7.3.1), Modern utilizes high-resolution aerial imagery, GIS tools, and Modern personnel for visual inspection of its system at least annually. Inspections are multi-purpose and include:

- Vegetation management
- Equipment/asset inspection (aging/damaged poles, equipment, etc.)
- Joint-use cataloging
- Safety/clearance/diversion

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.

There are no planned changes to Modern's inspection program within the initial three-year cycle corresponding with this WMP.

7.5 Workforce training

7.5.1 Current Strategy Overview

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

Modern's safety and training program include monthly (or more frequent) safety training meetings of Modern's field workforce and all staff as needed. Wildfire training as it pertains to this WMP will be included in the annual training of applicable staff, and as this WMP is updated and made available.

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.

See above (Section 7.5.1)

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.

Modern's high-voltage (12.5kV) distribution system is monitored and protected by switching apparatus with reclosing functionality at its distribution substations and at other locations. This involves de-energizing and (as appropriate) multiple re-energizing attempts when a circuit fault is sensed. Seasonal and storm-related settings changes can modify the speed, sensitivity, and operational characteristics of all of Modern's protective relays and systems. [Note: Operational security policies prevent further public disclosure (including in this WMP).]

Modern is continually evaluating its on-going practices as well as regional trends to determine whether modification to its system protection is necessary or appropriate.

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.

As mentioned above (Section 7.6.1) and within the three-year review cycle for this WMP, Modern will be evaluating the appropriateness and conditions under which circuit relaying and protective settings and characteristics might be altered. Such considerations *might* include:

- Non-reclose protective settings during Red Flag Warning conditions
- Complete and thorough line patrolling and evaluation prior to after-fault re-energization

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.

As in all emergency situations and storm events, and using extensive historical system operation/performance experience, Modern evaluates the situation and weighs the risks and probability of a utility-induced wildfire with the known outcomes of de-energizing urban electricity events (see Section 4.1).

No pre-emptive PSPS events are planned. However, if deemed necessary under extreme conditions, pre-emptive de-energizing actions may be taken and will be evaluated during on-going planning based on reasonably known information at the time.

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.

There are no planned changes to Modern's de-energization strategy within the three-year cycle corresponding with this WMP.

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.

After adoption, information regarding how to access and view Modern's WMP will be posted on Modern's website (URL: www.modernelectricwater.com) as well as communicated to Modern's customers through various methods including social media, website articles and bill-stuffers or mailers.

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.

There are no planned changes to Modern's customer communication and public awareness regarding this WMP within the three-year cycle corresponding with this WMP other than as mentioned in the proceeding section.

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.

Similar to other fault-caused or planned de-energizing events, Modern personnel will patrol and verify the affected circuits prior to re-energizing. Existing procedures exist for restoration efforts and are reviewed, adjusted and trained-upon periodically and as new staff are integrated into the organization.

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.

As of 2024, this is a new plan. Therefore, performance tracking, evaluation data and procedures are unavailable (specific to wildfire mitigation). (See Section 10.2 for future process improvement information)

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.

Metrics for measuring plan (WMP) performance are currently unavailable.

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.

In the future, Modern may incorporate tools and data metrics from other existing programs and procedures to address continued improvement in the WMP. Such items might include:

- GIS system tracking of inspections, work orders (maintenance, tree-trimming, etc.)
- Emergency Work Order (EWO) event tracking, data extraction (causes, fixes, durations, etc.), and frequency.
- Tracking weather event frequency (through SCADA trending, Nat'l Weather Service advisories, etc.)

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.

Practices and procedures exist for inspection, monitoring, and adjustment (see Section 7.4). Additional tools and metrics may be used (as indicated in Section 10.2) to address continued improvement in system inspection and performance and as it relates to this WMP.