

**Ohop Mutual Light Company
Wildland Fire Mitigation Plan**

October 7, 2024

Version 1.0

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.*

By October 31, 2024, and every three years thereafter, each consumer-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 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 format used here, 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. These plan elements 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 provides suggested topics, language, and guidance for wildfire mitigation. 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.

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

Appendix A. will provide additional documentation, illustrations, relevant metrics (see examples in template), or other relevant information that does not fit within the WMP.

Additional technical assistance regarding the requirements for this plan is available from the Department of Natural Resources and Washington State Department of Commerce. Contact information is provided below.

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

Submission: Please email your completed Wildfire Mitigation Plan to:

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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 Wildfire Mitigation Plan describes in detail the range of activities that Ohop Mutual Light Company is taking to mitigate the threat of utility involved wildfires, including various programs, policies, and procedures. To the best of our ability and current understanding, this plan complies with the requirements of HB1032 for customer owned electric utilities (COU) to prepare a wildfire mitigation plan by October 31, 2024, and review every three years thereafter.

2.2 Description of Where WMP Can be Found Online

This wildfire mitigation plan and additional information can be found in the [Stay Safe](#) link at ohop.coop.

2.3 Best Practices Cross-Reference Table

In accordance with HB 1032 – By October 31, 2024, and every three years thereafter, each Consumer-owned Utility must review, if appropriate revise, and adopt its wildfire mitigation plan.

3.0 Utility Overview

Ohop Mutual Light Company proudly provides electrical service to the rural residents in Pierce County, WA at the base of our national treasure, Mt Rainier/Mt Tahoma. With emphasis on our safety culture, our cost-conscious efforts continue to advance the reliability of essential electric service in our territory. For over 100 years, we have respected the harmony that exists between responsibly produced electric power and the natural environment that continues to sustain our membership. From the beautiful and vibrant Ohop Valley to the pristine Alder Lake and beyond, we honorably serve our membership and owners with accountability and pride.

3.1 Utility Description and Context Setting Table

The information provided was collected on August 1, 2024.

Table 1. Context-Setting Information Table

Utility Name	Ohop Mutual Light Company
Service Territory Size (sq miles)	83 sq mi
Service Territory Make-up	NA / Not tracked: Currently the territory mapping does not have access to layered information that includes the zones defined in the state template nor an equitable classification.
Service Territory Wildland Urban Interface (based on total area)	16.67% Wildland Urban Interface 53.01% Wildland Urban Intermix
Customers Served	4,118
Account Demographic	94% Residential 1% Agricultural 5% Commercial/Industrial
Utility Equipment Make-up (circuit miles) <small>Circuit miles are measured by linear path analysis in one plane</small>	Overhead Dist.: 257.96 miles, 54.87% Underground Dist.: 212.14 miles, 45.13%

Developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?¹	Yes
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	No

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 Components

The objective of this wildfire mitigation plan is to provide direction in mitigating potential ignition sources within the electric service territory and provide direction for recovery.

4.1 *Minimizing likelihood of ignition*

The following steps have been taken to promote a reduction of potential fire ignition sources from the Ohop Mutual Light Company (OMLC) electric system:

- 1) All new construction will be underground unless the installation is cost prohibitive or burdensome.
 - a. This program encourages reduced contact potentials to ignition fuels.
- 2) All fusing and system protection will be installed at a minimum level.
 - a. This practice intends to reduce the available fault current exposure time and thereby reduce the coincident energy to potential ignition source fuels.
- 3) Monitoring predicted and current weather conditions via PCWARN, National Weather Service, Department of Natural Resources, and local weather systems.
 - a. This information should be utilized to strategize and communicate with the OMLC customers and members for any potential power disruptions or alterations.
- 4) The distribution system will be highly sectionalized with single-operation fuses.
 - a. This practice in design should reduce affected areas and allow incremental sectionalization to reduce exposure in potential fire conditions.

4.2 *Resiliency of the electric grid*

The following steps have been taken to prepare for grid resiliency and prompt recovery of services:

- 1) Increased material inventory - OMLC has increased the material inventory for restoring services to accommodate for annual use and lead-times. The current inventory practice is available in OMLC Policy C-34.00
- 2) Spare vehicle maintenance - OMLC maintains spare vehicles for restoring services to provide more consistent response times that are independent of maintenance schedules.
- 3) Circuit redundancy - While OMLC has numerous radial circuits, redundant substation sources are maintained with pre-planned switching instructions.
- 4) Highly sectionalized electric system - The sectionalization of the distribution system utilizes single operation fuses in coordination with sectionalizing switch locations to promote outage limitations and faster partial restorations.
- 5) Underground conversions - OMLC is dedicating money for annual conversions to underground when practical, to reduce potential exposure to damage.

5.0 Roles and Responsibilities

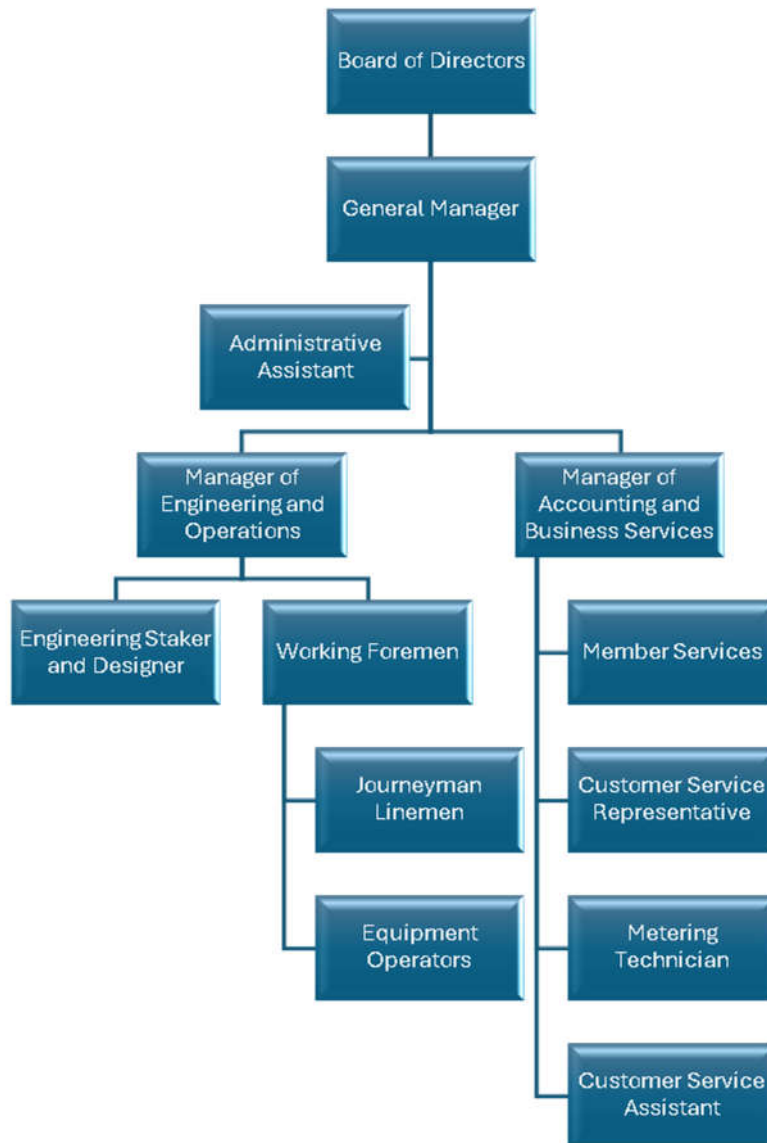
These sections provide an organizational overview of the utility and wildfire management or response personnel, coordination efforts with other local utilities and infrastructure providers, and any currently obligated or voluntary emergency management communication efforts.

5.1 Utility Roles and Responsibilities

During wildfire events, there are two scenarios for activation.

- 1) The mitigation of potential wildfire ignition sources during applicable weather events.
- 2) The safe restoration of services.

It is our intention to provide the roles and responsibilities of each here:



During a wildfire event, OMLC staff will assume the following roles and responsibilities in addition to standard assigned functions:

- 1) General Manager
 - a. Activates the Wildfire Mitigation Plan.
 - b. Oversee all communication with government agencies.
 - c. **Approves all outward communication, mitigation plans, and restoration plans.**
- 2) Administrative Assistant
 - a. **Coordinates and organizes all information to and from the General Manager.**
 - b. **Assists in creating communications to outside entities.**
 - c. Assists in material use tracking and acquisition.
 - d. Obtains replacement safety gear.
 - e. Coordinates food for staff and the delivery of that food when necessary.
 - f. Tracking crew members work hours to ensure proper rest and code compliance.
- 3) Manager of Engineering and Operations
 - a. **Reviews situational awareness tools and recommends a course of action to the General Manager.**
 - b. Reviews information provided by the reviewed resources to determine the best course of restoration and employee safety.
 - c. Develop restoration switching orders as necessary.
 - d. Implements the course of restoration and prevention action with the crews.
 - e. Reviews outage information for prioritization and restoration effort coordination.
 - f. Communicates with field staff concerning scheduling, outside assistance coordination, rest periods, and provides updates for crew safety.
 - g. Coordinate power supply restoration and communication with Bonneville Power Administration (BPA) and Tacoma Power (TPU).
- 4) Manager of Business Services and Accounting
 - a. **Oversee posting and transmission of public communication.**
 - b. **Outage Management software reporting to the General Manager and the Manager of Engineering and Operations**
 - c. **Monitoring internal security systems for situational awareness.**
 - d. **Communicate with distributed generation customers to coordinate system shut down and restoration safety.**
 - e. Accumulate information for any potential government assistance filing.
- 5) Utility Specialist
 - a. Reviews areas of damage prior to line crew deployments.
 - b. Take material to crews as needed.
 - c. Assist crew as a groundman when needed.

- d. Guide Outside crews assisting with restoration.
- 6) Customer Service Assistant
 - a. Reviews areas of damage prior to line crew deployments.
 - b. Take material to crews as needed.
 - c. Guide Outside crews assisting with restoration.
- 7) Engineering Staker and Designer
 - a. Reviews areas of damage prior to line crew deployments.
 - b. Take material to crews as needed.
 - c. Assist in tracking material in and out of the warehouse as needed.
- 8) Member Services
 - a. Assist in communicating information with customers through social media, messaging, direct calling, etc.
 - b. Assist employee families as needed.
 - c. Entering information into the Outage Management software by inputting assignments, combining, assignment of cause codes, and restoring outages as necessary.
- 9) Customer Services
 - a. Answer calls and coordinate with the call answering system.
 - b. Assist in collecting and organizing information for potential government agencies.
 - c. Assist in coordinating food for staff and the delivery of that food when necessary.
- 10) Working Foremen
 - a. Oversee the field employees perform restoration services under adverse and stressful situations.
 - b. Restore or shut off power as necessary and as is directed by the Manager of Engineering and Operations.
 - c. Communicate with crew members concerning the plan for restoration.
 - d. Communicate with the office concerning power status and location.
 - e. Perform switching functions as necessary restorations or transfers.
 - f. Assign crew members roles and responsibilities.
- 11) Journeyman Linemen
 - a. Safely perform restoration services under adverse and stressful situations.
 - b. Track material used by the crew.
 - c. Monitor truck stock to request additional material from the office.
- 12) Equipment Operators
 - a. Safely perform restoration services under adverse and stressful situations.
 - b. Monitor fleet status and communicate needs to the office.

5.2 Coordination with local utility and infrastructure providers

Ohop Mutual Light Company will coordinate with outside companies to meet operational needs and awareness. This outside communication will be coordinated from two different aspects, transmission or power supply and power distribution.

Power supply communication will be primarily with Bonneville Power Administration in conjunction with notifications to Tacoma Power. Because OMLC is served from a radial transmission circuit, the status of power supply stability and availability will be coordinated

primarily through the BPA Transmission Account Executive, BPA Customer Service Engineer, and BPA Account Executive while copied to Tacoma Power Utilities dispatch.

Power distribution operation and restoration will primarily utilize OMLC employees. During events requiring additional field support, Ohop Mutual Light Company will coordinate with utilities having pre-arranged mutual aid agreements and pre-approved outside construction contractors.

5.3 Coordination with local Tribal entities

Ohop Mutual Light Company does not currently coordinate with tribes. OMLC will establish and coordinate wildfire efforts once the co-managed state park is active in the service territory.

5.4 Emergency Management / Incident Response Organization

Ohop Mutual Light Company is proud of the positive relationship established with local emergency response entities. OMLC maintains a strong relationship with Washington Department of Transportation, Washington State Parks, Pierce County Fire, and Pierce County Emergency Management. OMLC also monitors emergency response information from the Federal Emergency Management Association.

During a designated wildfire event, communications to these entities will occur as designated in 5.1 above. Outside entity coordination and communication will be coordinated through the General Manager or a designee.

Periodic training will be coordinated through the offices listed above.

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

Ohop Mutual Light Company maintains a rural electric distribution system that acknowledges a few standard risks that are considered during design, construction and the resulting operations and maintenance.

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

Considerations for wildfire mitigation should include but not be limited to:

- Vegetation growth and species of tree in the area.
- Wetlands that could require overhead construction.
- County and State traffic corridors including the challenges within the corridors and coordinating future maintenance in the corridors.
- Funding limitations from individuals establishing new services.
- Ease of access with increasing security requirements of OMLC members.

6.2 Enterprise-wide Wildfire Safety Risks

Wildfire Safety Risks are reviewed through the standard inspection program identified in OMLC Policy OMLC Policy C-33.00.

7.0 Wildfire Preventative Strategies

Ohop Mutual Light Company utilized the knowledge of the local logging community in conjunction with industry standards to establish practices that have assisted in mitigating ignition sources and grid resiliency for over one hundred years. OMLC will continue this tradition through the practices covered here and in associated practices and policies.

7.1 Weather Monitoring

7.1.1 Current Strategy Overview

OMLC currently uses the Pierce County warning system PCWARN for notifications and information concerning wildfire risk factors for the service territory.

7.1.2 Planned Updates

OMLC is reviewing remote weather stations for deployment in the service territory to establishing more localized information including rainfall and wind speeds and directions.

7.2 Design and Construction Standards

7.2.1 Current Strategy Overview

Utilized best practices for construction standards are discussed in section 4.2.

7.2.2 Planned Updates

OMLC will continue to utilize information concerning new technology for mitigating wildfire ignition sources and system hardening. Sources for review could include but will not be limited to:

- Northwest Public Power Associate Engineering and Operations Conference
- Federated Insurance sources
- Vendor and supplier sources

Current areas of review include:

- Non-expulsion fuses
- Pole treatments and wraps
- Lowering relay operation thresholds

7.3 Fuel & Vegetation Management

7.3.1 Current Strategy Overview

Current vegetation management strategies are described in the Vegetation Management Plan. OMLC policy S-12.8.

7.3.2 Planned Updates

No updates are planned at this time.

7.4 Asset Inspections and Response

7.4.1 Current Strategy Overview

Inspections for overhead, vegetation encroachment, and underground systems are performed on a multi-year rotation as described in the OMLC Inspection Program. OMLC Policy C-33.00.

7.4.2 Planned Updates

Ohop Mutual Light Company will regularly monitor new technology and advancements in equipment for inspection.

7.5 Workforce training

7.5.1 Current Strategy Overview

Regular training will occur within the month of May in preparation for fire season. New technologies being deployed within the next year for wildfire mitigation will be explained.

7.5.2 Planned Updates

There are currently no planned updates to the training strategy.

7.6 Relay and Recloser Practices

7.6.1 Current Strategy Overview

Ohop uses the following protection devices within the service territory:

- Triple/Single reclosers
- Expulsion Fuses.

The current practice is to fuse the lines with the minimum level fuse to accommodate the anticipated power utilization in the area. The existing low setting reduces the potential arc-flash energy and thereby the total energy available as a potential ignition source.

7.6.2 Planned Updates

Some updates in protection schemes may result in research performed in association with section 7.2.2. In addition, OMLC is reviewing the available arc-flash current and settings for the system.

7.7 *De-energization / Public Safety Power Shutoff*

7.7.1 Current Strategy Overview

Once information is received as identified in section 7.1.1, and once all effected customers have been notified of a potential shutoff, OMLC will de-energize circuits under extreme conditions, if requested by outside entities and approved by the board of directors, and as a last resort. OMLC recognizes that many members have safety and preventative systems which require power. Such systems may include firefighting, and communication systems that may be vital.

7.7.2 Planned Updates

No changes are anticipated in this strategy.

8.0 Community Outreach and Public Awareness

8.1 *Current Community Outreach and Public Awareness Program*

OMLC has communicated wildfire preparedness information through articles in the monthly Ruralite magazine sent to all customers/members.

8.2 *Planned Updates*

OMLC Membership Services is reviewing additional training and communications options with the General Manager.

9.0 Restoration of Service

Service restoration will occur as needed and by following the guideline set in OMLC Policy C-35.00 while observing the potential threat of smoke danger covered in OMLC policy E-32.01.

10.0 Evaluating the Plan

OMLC will accumulate information in any situation when the plan is activated and review the success of the plan as indicated in the OMLC outage recovery plan (OMLC Policy C-35.00).

Any changes proposed for the plan that result from the review, will be evaluated at the end of fire season.

Necessary changes will be proposed to the Power Board for inclusion in the plan. Since the plan requires board of director approval, changes will occur no more often than once per year.

10.1 Metrics and Assumptions for Measuring Plan Performance

The current plan will call for a year-over-year comparison by charting the following indices and the favorable trend is denoted with the key performance indicators.

- Red flag days No Utility Control
- Wildfires within the territory per red-flag day No Utility Control
- Cost of damage due to wildfires Trend down
- Early notification preparation time Trend down
- Restoration time due to wildfires Trend down
- New technology effectiveness Track indices above in new-tech deployment areas
- PSPS activations Trend down

10.2 Identifying and Addressing Areas of Continued Improvement in the Plan

Nothing to catalog at this time. Future changes will be denoted here.

10.3 Monitoring the Performance of Inspections

The system inspection process is recorded in OMLC Policy C-33.00.

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

Outage Metrics:

- Distribution:
 - Utility Identified Outage Case