



**DEPARTMENT OF
NATURAL RESOURCES**

**OFFICE OF THE
COMMISSIONER OF PUBLIC LANDS**

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December 27, 2024

The Honorable Bernard Dean
Chief Clerk of the House
338B Legislative Building
Olympia, WA 98504

The Honorable Sarah Bannister
Secretary of the Senate
312 Legislative Building
Olympia, WA 98504

Dear Chief Clerk Dean and Secretary Bannister:

Please accept the enclosed legislative report on the Electric Utility Wildland Fire Mitigation Plans, submitted on behalf of Department of Natural Resources (DNR), as required in 2SHB 1032 (Chapter 132, Laws of 2023) and codified in RCW 76.04.185. The statute directs DNR to submit a compilation and summary of existing wildfire mitigation plans maintained by electric utilities to the appropriate committees of the Legislature by December 31, 2024.

Should you have any questions, please contact me at 360-486-3469 or Brian.Considine@dnr.wa.gov.

Sincerely,

Brian Considine
Legislative Director
Office of the Commissioner of Public Lands

Enclosure: Legislative Report – Electric Utility Wildland Fire Mitigation Plan

cc: Members of the Senate Environment, Energy & Technology Committee
Members of the House Agriculture & Natural Resources Committee
Members of the Senate Ways and Means Committee
Members of the House Appropriations Committee
Office of Financial Management
Ruth Musgrave – Senior Policy Advisor, Natural Resources, Office of the Governor

Electric Utility Wildland Fire Mitigation Plan Template Development and Deployment

Summary and Compilation

Prepared by Guidehouse in consultation with
Washington State Department
of Natural Resources

Office of the Commissioner of Public Lands, Hilary Franz
Loren Torgerson, Wildland Fire Strategic Advisor
December 23, 2024



WASHINGTON STATE DEPARTMENT OF
NATURAL RESOURCES



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Executive Summary

In passing SSHB 1032 the legislature believed that it was in the best interest of the state, their citizens, and their natural resources to identify the sources of wildland fires, identify and implement best practices to reduce the prevalence and intensity of those wildland fires, and put those practices in place to reduce the risk, damages and losses resulting from those fires.

Many electric utilities (Utilities) had developed and are implementing wildfire mitigation plans, some prior to the passing of SSHB 1032. These Utilities are partners with state agencies, emergency responders, and public and private entities in identifying best practices to reduce the risk of and prevent wildland fires. The legislature believes Utilities should be informed by recognized best practices, as applicable to their geography, terrain, vegetation, and other characteristics specific to their service area, for reducing wildland fire risk and reducing damage from wildland fires as may be ignited by electric utility equipment.

As a result, Washington Department of Natural Resources partnered with Guidehouse to plan, develop and distribute a Wildfire Mitigation Plan (WMP) template. This template included guidance and best practices for utilities submitting a WMP in response to SSHB 1032. To increase public transparency, SSHB 1032 requires that Utilities provide their WMPs to the state.

Included in this report is a summary of the methodology and approach to development, outreach, and ad-hoc technical support provided to the utilities during the drafting process. Due to the nature of wildfire risks and the increasing land areas susceptible to these risks, Wildfire Mitigation Planning requires regular evaluation and evolving strategies for addressing risk. A mature wildfire mitigation program can take several years of review and refining to best meet the needs of a geographically diverse state and set of utility stakeholders. The first cycle of WMP drafting and submission shows considerable effort toward awareness and wildfire preparation. This report is intended to provide a summary of current WMPs which can be used as a benchmark for future submission cycles as well as to evaluate outcome against expectations.

Methodology and Approach

Template Development

The Department of Natural Resources (DNR) selected Guidehouse Consulting (Guidehouse) to work with DNR, Washington State Department of Commerce (COMM), and the Wildfire Advisory Committee to develop a list of elements to include in a template to provide to utilities state-wide as an effort to standardize reporting and tracking methods of any wildfire mitigation planning across the state. Guidehouse provided their expertise and several years' experience in designing, drafting, and reviewing WMPs along with industry best practices to draft an initial list of recommended elements.

The steps outlined below describe the stakeholders consulted and steps to collect feedback about the needs and expectations of utilities and the public across Washington¹:

- 1. DNR**

The initial draft of suggested elements and template format was provided to DNR in October 2023 for review and feedback was incorporated.

- 2. Utility Wildland Fire Prevention Committee**

The template and list of elements was presented to the Utility Wildland Fire Prevention Committee in November 2023. Feedback resulted in updates to the elements and guidance in each section for clarity.

- 3. COMM**

COMM recommended additional guidance language and a cover letter to provide context and an overview of expectations for using and submitting the template.

- 4. Final Draft**

Prior to submission to utilities for feedback period, sign-off was received from the DNR and COMM in December 2023.

¹ Note: As part of their regular course of duties, the Department of Commerce works closely with utilities on a wide range of activities, including Wildfire-related activities. Guidehouse worked closely with Commerce to provide updates and solicit feedback as appropriate to avoid duplicate efforts and information blind spots on any relevant or in-scope items.

5. Distribution for Open Comment

The draft template was transmitted to Electric Utilities, the Utilities and Transportation Commission, and the Office of Tribal Affairs within the Governor's office for review and open comments on December 29, 2023.

The draft was made available for review and comment online and through distribution via email. Feedback and questions received during this process prompted the development of an FAQ document.

6. Public Open Comment Sessions

Two sessions were held for open comment from the public and utilities. These were conducted on February 28 and March 7, 2024. Each session included a brief overview of the project and purpose and was left open for discussion. Attendance by the public was minimal and attendees mostly represented utility and utility-adjacent stakeholders seeking clarification on process and expectations. Questions were incorporated into the FAQ, as appropriate.

Template Distribution

At the end of the feedback period, all feedback received was evaluated and, if relevant, incorporated into the template. The final template was then published and distributed for use on April 1, 2024. The final template package included:

- a. The WMP template with the recommended list of elements and a description of what to include in each section along with sample language for some sections.
- b. A cover letter providing context and further explanation of expectations and guidance for developing the template and directions for submitting a completed WMP.
- c. An FAQ document that included contact information for DNR and COMM for additional questions or feedback.

Guidehouse, in collaboration with DNR and COMM, developed language for email distribution. Email communication was managed by COMM.

A file sharing repository was created for WMP submissions with a backup option for emailing the completed WMP directly to DNR or COMM.

Guidehouse was retained to provide support for technical review and consultation with utilities following the distribution of the template. Three utilities utilized this option.

WMP Submission Summary

WMPs completed in the DNR developed template were to be submitted by October 31, 2024. Submissions were collected via a Box site set up by the DNR team. A total of 39 utilities provided WMPs.

The below table summarizes plan submissions.

	Count	Percent
Expected Utility Submissions ²	63	
Total Submissions	39	62%
Non-Submission	24	38%

Adherence to Template

To better understand how Utilities are utilizing the template and the level of information tracked or made available, Guidehouse reviewed the submissions and summarized the responses.

Of the 39 submissions, six utilities submitted plans utilizing a format different from the WA DNR template. Of those six utilities, four submitted plans that appear to have been developed prior to the publishing of the DNR recommended elements and format.

For all six submissions that did not use the template, the plans were detailed and contained many, if not all, of the elements suggested in the DNR template. For the purposes of this evaluation, all submissions were included in themes and summaries, regardless of format.

- Most utilities elected to use the template provided to them by DNR with no modifications. Formatting and headings were kept as-is and the guidance language was responded to with the information requested, to the degree that it was available for their utility.
- Eight utilities partnered/contracted with a third party for plan advisement and drafting support. The mitigation plans submitted by these utilities contained all the elements outlined in the DNR WMP template, with the addition of utility branding and graphics.

² Number of expected submissions was determined as the number of utilities operating electrical infrastructure within the State of Washington, as tracked and provided to Guidehouse by Washington State Department of Commerce.

- Two utilities elected to keep the format of their existing WMP, providing cross-references to the applicable DNR-developed WMP template section. Cross-references were summarized in a table at the beginning of the report, or italicized references next to the utility's existing WMP section heading.
- Some utilities elected to expand on the DNR template, adding subsections to the listed elements. These expansions demonstrate more mature wildfire mitigation programs, that have likely invested in mitigation planning prior to the passage of SSHB 1032. The additional sections add a level of detail to the WMP and could be used as a basis for future additions to the template.
- Four utilities elected to remove template sections in their WMP submission. Presumably these sections did not apply to those specific utilities, or the utilities provided responses in other sections.

WMP Content Summary

The below themes are observations made during the review process that helped paint a picture of the reports submitted. These themes are meant to provide detail to the reports at a high level and give some insight into items that may warrant further discussion and planning prior to the next WMP submission cycle.

- Content Overview
 - Report length varied from 8 pages to 139 pages, including appendices.
 - The Context-setting Information Table (Section 3 of the DNR template) was filled out, either partially or in full, by >90% of utilities.
 - 92% of utilities have evaluated the need for protocols to de-energize or preemptively shut off electricity in response to elevated wildfire risks.
 - 64% of utilities referenced developed protocols for enacting de-energization.
 - Nine utilities included attachments with supplemental information.
- *Executive Summary* – This section of the WMP template received a range of responses. Some elected to keep the DNR provided language. Others elected to only modify the DNR language slightly to include their utility name and agreement that wildfire mitigation planning is important moving forward for utilities in the State of Washington. Some utilities elected to completely rewrite the Executive Summary section to reflect

what could be found in their report. *Note: there was no expectation on how to fill this section out, but further direction may help standardize the response.*

- *Best Practices Cross Reference Table* (Section 2 of the DNR template) – overall response to this section was low, indicating that it may not be useful or relevant at this stage.
- *Wildfire Risks and Drivers Associated with Design, Construction, Operation, and Maintenance* (Section 6 of the DNR template) – overall response was limited. Responses either did not expand on risk evaluation or included risk evaluation information elsewhere in the report. This section may be better incorporated elsewhere in the report or re-organized to elicit a greater response.
- *PSPS or De-energization* (Section 7.7 of the DNR template) – The term “plan” appeared to be interpreted as a scheduled event. This section is intended to elicit any defined protocol, procedures, or processes in place for de-energization. WMP template updates may benefit from clarifying that there are no best practices or recommendations for utilities to have scheduled de-energization associated with wildfires or wildfire risk.
- Guidehouse noted the following items as indicative of mature wildfire mitigation programs:
 - Maps and figures that provided an additional level of detail that could not be captured in the narrative sections.
 - Risk/Hazard Assessment Material highlighting evaluation of where risk/hazard existed in the service territory, information that would be used to support wildfire-related decision making. This mapping improves decision-making related to asset and vegetation management and inspection, grid hardening initiatives, and device settings.
 - Robust Asset and Vegetation Management Plans – Many utilities provided information related to the asset and vegetation management plans, but the mature plans provided a higher level of detail, highlighting items such as:
 - Inspection methods used
 - Condensed timelines for total service territory and system review
 - Procedures that meet or exceed standards set by NERC or other governing bodies

Appendix A. Summary of Existing WMPs

The following are Wildfire Mitigation Plans submitted to WA DNR prior to the finalization and release of the DNR developed WMP Template that was made available to Utilities in April of 2024.

Utility Name	Document Title	Document Date	Pages	Number of Sections	Metrics Tracked	Notes
Avista Utilities	210254-AVA-Attachment A - Avista 2023 Wildfire Resiliency Plan	1/23/2023	58	13	Yes	13 Sections + a glossary of terms V3 A Wildfire Communication Plan was also submitted.
Kittitas PUD No. 1	2023 Board Resolution 1167 Adopt the Wildfire Mitigation Plan	3/28/2023	32	7	None found in WMP	Developed using National Electric Safety Code 7 sections + 2 Appendices V0
Klickitat PUD	KPUD_WMP_Draft_032222	Mar-2022	104	7	Yes	7 Sections + 3 Appendices V0 Applies to all of Klickitat County and parts of Skamania, Yakima, and Benton Counties
Mason County PUD 1	Wildfire Mitigation Plan (2022)	Feb-2022	33	4	Yes	4 Sections + 4 Appendices (Hazard maps)
Mason PUD 3	Wildfire Prevention Plan - ADM.wildfireprevention.com	Apr-2022	21	13	Yes	13 Sections + 5 Appendices
Pacific Power	Washington Wildfire Mitigation Plan	11/16/2023	56	12	Yes	
Puget Sound Energy	7616_WildfirePlan_2023	Jun-2023	48	7	Yes	7 Sections + 3 Appendices

Appendix B. WMP Respondents

1. Avista Utilities
2. Benton REA
3. City of Centralia
4. Chelan PUD
5. City of Cheney
6. Clallam PUD
7. Clark PUD
8. Clearwater Power, ID
9. Columbia REA
10. Cowlitz PUD
11. Douglas PUD
12. City of Ellensburg
13. Elmhurst Mutual Power & Light
14. Ferry PUD
15. Grant PUD # 2
16. Grays Harbor PUD
17. Inland Power & Light
18. Kittitas PUD
19. Klickitat PUD
20. Lakeview Light & Power
21. Lewis County PUD
22. Mason PUD #1
23. Mason PUD #3
24. Modern Electric
25. Northern Lights Power, ID
26. Ohop Mutual Light Co.
27. Okanagan County Elec. Coop
28. Okanagan PUD
29. Pacific PUD
30. PacifiCorp (Pacific Power)
31. City of Parkland Light & Water Co
32. Pend Oreille PUD
33. Peninsula Light Co
34. Puget Sound Energy
35. Seattle City Light
36. Skamania PUD
37. Snohomish PUD
38. Tacoma Public Utilities
39. Tanner Electric Coop