



**DEPARTMENT OF  
NATURAL RESOURCES**

**OFFICE OF THE  
COMMISSIONER OF PUBLIC LANDS**  
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MS 47001  
OLYMPIA, WA 98504-7001

June 30, 2025

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 report, submitted on behalf of the Department of Natural Resources (DNR), as directed in RCW 76.04.780. The statute directs DNR to report to the Legislature on the prior biennium proceedings of the Utility Wildland Fire Prevention Advisory Committee, including identification of recommended legislation, if any, necessary to prevent wildfires related to electric utilities. The report is due to the Legislature at the beginning of every biennium.

Should you have any questions, please contact me at 360-584-6873 or [Pat.Sullivan@dnr.wa.gov](mailto:Pat.Sullivan@dnr.wa.gov).

Sincerely,

Pat Sullivan  
Director of Governmental & External Affairs  
Office of the Commissioner of Public Lands

Enclosure: Legislative Report – 2025 Utility Wildland Fire Prevention Advisory Committee

cc: Members of the Senate Agriculture and Natural Resources Committee  
Members of the House Agriculture and Natural Resources Committee

# Utility Wildland Fire Prevention Advisory Committee — Biennial Report, July 2025

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Completed Tasks and Recommended Future Work

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Prepared by  
Utility Wildland Fire Prevention Advisory Committee Chair, Robyn Whitney  
Washington State Department of Natural Resources

Office of the Commissioner of Public Lands, Dave Upthegrove



WASHINGTON STATE DEPARTMENT OF  
**NATURAL RESOURCES**

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# Executive Summary

This report to the legislature highlights the work completed by the Utility Wildland Fire Prevention Advisory Committee (advisory committee) during the prior biennium (July 2023 – June 2025) as well as a preview of the work moving forward. The report highlights accomplishments of the advisory committee including completion of the 2024 summary and compilation report to the Legislature on utilization of the Wildfire Mitigation Plan (WMP) template and the development of an inter-agency agreement between the Department of Natural Resources and Department of Commerce creating a framework for providing technical assistance support to utilities in their efforts to develop and implement WMP's.

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# Introduction

In 2019, the Washington State Legislature (legislature) created the Utility Wildland Fire Prevention Task Force (task force) with the passage of Substitute Senate Bill 5305 (Chapter 77, Laws of 2019) to advise the Department of Natural Resources (department) on issues related to preventing wildland fires caused by utilities such as model agreements, protocols, thresholds, and identifying third parties that can assistance when needed. The task force met quarterly from July 2019 through December 2020 and DNR submitted a [final report](#) to the legislature from results and recommendations.

In 2021, the legislature established a permanent Utility Wildland Fire Prevention Advisory Committee (advisory committee) in Engrossed Senate Bill 5158 (Chapter 183, Laws of 2021). The bill was codified in RCW [76.04.780](#) and became effective July 25, 2021. In permanently establishing the advisory committee, the legislature created a forum for electric utilities, the department, forestland owners, historically marginalized communities, and fire suppression organizations to meet, identify, and develop solutions for utility wildland fire prevention and risk mitigation. The advisory committee addresses matters related to utility transmission and distribution networks, identification of best management practices, electric utility infrastructure protection, and wildland fire suppression and response. The Commissioner (or designee) chairs the committee and appoints members that include:

- One person representing each investor-owned utility;
- Two persons representing municipal utilities;
- Two persons representing public utility districts;
- Two persons representing rural electric cooperatives;
- One person representing small forestland owners;
- One person representing industrial forestland owners;
- Other persons with expertise in wildland fire risk reduction and prevention;
- Two persons representing historically marginalized or underrepresented communities; and,
- Other persons whom the commissioner deems appropriate to carry out the functions of the committee.

The legislature intended that the advisory committee specifically address issues related to the ongoing implementation of the relevant recommendations of the electric utility wildland fire prevention task force established in 2019. This included:

1. Finalizing a model agreement for managing danger trees and other vegetation adjacent to utility rights-of-way on state uplands managed by the department;
2. Implementing recommendations of the task force related to communications and information exchanges between the department and utilities;
3. Implementing recommendations of the task force related to protocols and thresholds when implementing provisions of RCW 276.04.015; and
4. Implementing recommendations of the task force related to creating rosters of certified wildland fire investigator firms or persons and qualified utility operations personnel who may be called upon as appropriate;
5. Establishing joint public communications protocols among members of the advisory committee, and other entities, to inform residents of the state of potential critical fire weather events and the potential for power outages or disruptions;
6. Providing comment to the wildland fire advisory committee established in RCW 76.04.179 through an annual presentation addressing policies and priorities of the utility wildland fire prevention advisory committee; and
7. Addressing other related issues deemed necessary by the commissioner.

The legislature also established reporting requirements for the department to submit a biennial report to the legislature beginning July 1, 2022, that:

1. Describes the prior biennium's proceedings of the advisory committee, and;
2. Identifies recommended legislation from the advisory committee, if any, necessary to prevent wildfires related to electric utilities.

# Acknowledgements

## Wildland Fire Prevention Advisory Committee Members:

Name	Position
Robyn Whitney - Chair	Designee - Commissioner of Public Lands
Mathew Ugaldea – Avista, Wildfire Program Specialist	Individual representing an investor-owned utility
Allen Berreth – Pacific Corp., T&D Operations Vice President	Individual representing an investor-owned utility
David Bayard – Puget Sound Energy, Wildfire Risk Manager	Individual representing an investor-owned utility
Anabel Roza – Seattle City Light, Vegetation Management & Wildfire Mitigation Manager	Individual representing a municipal utility
VACANT	Individual representing a municipal utility
Colin Willenbrock – Public Utility District No. 1, General Counsel, Snohomish County	Individual representing a public utility district
VACANT	Individual representing a public utility district
Garry Rosman – Inland Power & Light, Board Member	Individual representing a rural electric cooperative or mutual corporations or associations
VACANT	Individual representing a rural electric cooperative or mutual corporations or associations
Jason Callahan – Green Diamond, Policy & Communications Manager	Individual representing industrial forest landowners
VACANT	Individual representing small forestland owners
John McDonald – Senior Wildfire Investigator, WADNR	Person with expertise in wildland fire risk reduction and prevention
Evelyn Andrade – Earth Corps, Board of Directors	Individual representing historically marginalized or underrepresented communities
VACANT	Individual representing historically marginalized or underrepresented communities
Elizabeth King – Emergency Resilience & Emergency Management Director, WADOC	Representative of the energy resilience and emergency management office – Department of Commerce
Brett Shearer – Deputy Director, Regulatory Services, WAUTC	Representative of the Utilities and Transportation Commission

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# Proceedings of the Advisory Committee

## Advisory Committee Meeting Dates

- Since the July 2023 report, the Advisory Committee met on the following dates:
  - August 16, 2023
  - November 15, 2023
  - February 21, 2024
  - May 22, 2024
  - August 21, 2024
  - November 20, 2024

The former Chair continued to solicit and fill vacancies on the committee, increasing overall membership and representation. The former Chair of the advisory committee, Loren Torgerson retired from DNR February 2025 and as a result, the advisory committee did not convene in February or May of 2025 for regular meetings. Several vacancies remain, due to recent membership turnover.

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# Completed Tasks

- On December 27, 2024 the Department of Natural Resources (DNR) submitted a [report](#) to the legislature, compiling and summarizing existing wildfire mitigation plans maintained by electric utilities as required in 2SHB 1032 (Chapter 132, Laws of 2023) titled, *Electric Utility Wildland Fire Mitigation Plan Template Development and Deployment*.

This report summarized the methodology and approach in the development, outreach, and ad-hoc technical support provided to the utilities during the drafting of the Wildfire Mitigation Plan (WMP) template — an effort supported by the Advisory Committee, DNR, the Washington State Department of Commerce (DOC), and Guidehouse consulting services.

The WMP template helps coordinate statewide efforts for all utility wildfire mitigation planning and standardize reporting and tracking methods for all utility WMP's.

- On January 29, 2025 DNR and DOC finalized an interagency [agreement](#), providing a framework for providing technical assistance support to utilities in their efforts to develop and implement WMP's. This interagency agreement will reduce duplication of efforts around existing technical support provided by both agencies and will support efforts to reduce the risk of wildland fires and damage and losses resulting from those fires.
- The advisory committee developed and approved a roster of subject matter experts (SME's), providing utilities with a support network for delivering technical assistance and supporting utilities efforts related to vegetation management, wildfire investigations, post wildfire assessments and other technical matters.
- The advisory committee added a representative from the Department of Commerce, Elizabeth King, Director of Emergency Resilience and Emergency Management resulting in increased coordination and support between DNR as well as increased DNR attendance and engagement in support of DOC's Pre & Post Season Wildfire Workshops. The workshops provided utilities and local fire service with updated rosters to increase coordination with response efforts.

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# Future Advisory Committee Tasks

- Development of a utility-interagency wildfire communications and coordination plan to enhance inter-communication between DNR and the utilities related to:
  - Pre-wildfire season coordination, inspections, vegetation management;
  - DNR response to wildfires;
  - Providing technical assistance and expertise to utilities for post-wildfire assessments;
  - Improving coordination and communication between all relevant parties.

The development of a utility-interagency wildfire communications and coordination plan is the last remaining recommendation from the previous task force to be completed. Opportunities exist to utilize and integrate DOC's existing communications plan with utilities.

- Assess opportunities for transitioning the role of the Advisory Committee toward a more intentional and formal advisory role to help guide DNR in its partnership efforts to reduce wildfire risk.
  - The advisory committee convened May 21<sup>st</sup>, 2025 to introduce the new Chair, Robyn Whitney, Strategic Advisor to the State Forester.
  - State Forester/Deputy Supervisor Wildland Fire Management for DNR, George Geissler presented the option of having a utility representative serve as Chair of the advisory committee in the future to facilitate a transition to a formal advisory role to DNR.
- Develop recommendations related to the challenges utilities face in securing adequate insurance policies as a result of increased wildfire risk.
  - Explore opportunities for addressing the concerns of utility liability while balancing DNR's wildfire suppression and management needs.
- Review and update the committee charter to meet the needs of committee members and advise the Commissioner of Public Lands.
  - Explore opportunities for establishing a subcommittee to provide strategic direction, create workflow efficiencies, enhance productivity, and increase engagement for the advisory committee.
- Develop recommendations for resource and technical support and sharing between investor-owned Utilities (IOUs) and local cooperatives (Co-ops).

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# Recommendations

The advisory committee has been focused on implementation of the provisions of HB 1032 to mitigate the risk of wildfire through electric utility planning and does not have any legislative recommendations at this time. The advisory committee recognizes opportunities for developing legislative recommendations related to insurance for utilities related to wildfire and sharing of resources and technical assistance between IOUs and Co-ops.

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# Appendices

## **Appendix I: Electric Utility Wildland Fire Mitigation Plan Template Development and Deployment**

Washington State Department of Natural Resources

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 30, 2024

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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.

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# 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 Washington<sup>11</sup>:

### 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. Wildfire Advisory Committee

The template and list of elements was presented to the 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.

#### **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.

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## 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 <sup>[2]</sup>	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.

- 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

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# Lessons Learned and Recommendations

While submission rate is an important metric to track, the primary goal of wildfire mitigation planning is to understand wildfire risk in order to mitigate that risk and prepare for the impacts of wildfires. With those goals in mind, Guidehouse provides the following recommendations with a focus on improving engagement and eliciting the most relevant wildfire related data in future WMP drafting and submission cycles. Specific improvements to the template are made to enhance the data first and increase adherence to the template second.

## Communication

- Ensure there is an accurate list of all utilities expected to comply with SSHB1032 (and subsequent legislation on WMP drafting) and verify correct utility contact information. We received one piece of feedback that a utility contact was incorrect.
- Begin communication for 2027 cycle as soon as possible. Some of the feedback received was that there was not enough time to produce a WMP. Communicating expectations for the next cycle as soon as possible will allow for time to plan resources and collect information as needed.

## List of Utility Related Wildfires

- Review DNR data needs from 2024 submission cycle (e.g., wildfire tracking data) and work with associated groups to determine if any updates to tracking or data collection will improve the output for the 2027 cycle.
- Review the template to include a section or appendix for wildfire information, including an attestation that the list was referenced but no fires applied.
- Consider providing the information to utilities ahead of the drafting cycle/as soon as possible to capture the full timeline of wildfire tracking.
- Determine a date to communicate wildfire data to utilities for the 2027 drafting cycle and work backward to pull and review the information in timely manner.
- Clarify what information is needed in this list to ensure proper communication and expectations for utilities, DNR, and supporting agencies.
- Determine if the list can be provided in a format other than ArcGIS (an account is required to access the GIS database).

**Standardize Submission Process** – move toward a standardized location that can operate as a one-stop-shop for WMP drafts, including resources, links, template, contacts, etc.

- Design and implement an internal repository. Manual submissions are challenging for both utilities and the compiling agency/group and requires reliance on a third party to store and catalogue.
- Benefits of designing an internal storage and tracking tool:
  - Standardized intake (metadata such as Utility name, date, etc.).
  - Standardized document format.
  - Year over year monitoring of submissions (especially if utilities are provided a unique ID).
  - Streamlined communication – one-stop-shop for all WMP resource needs, including template download, FAQ, contact information, feedback, list of wildfires, etc.
  - Easy sorting and export options (search WMPs by year, title, utility, etc.).
  - Control over data without relying on a third-party system or technology.
  - Consistent process – establishing a central location early in the process will reduce change fatigue and confusion with each subsequent submission cycle.

### **WMP Support**

- Consider expanding awareness of WMP planning to additional departments or stakeholder groups. For example, in addition to Commerce, DNR project supports, and the Guidehouse team, it was noted that utilities work with local DNR staff on issues related to their region.
- Understanding more broadly what resources utilities employ can improve messaging and ensure people are directed to the most up to date information.

### **Template Updates**

- Several sections were interpreted differently than intended or not used at all (or minimally) – review the major themes sections and make updates to the template accordingly.
- Some sections could be removed and added back if/when they become relevant as Washington state’s WMP process matures. Other sections may benefit from reorganization/redistribution.
- Review all areas where questions or ambiguity came up around word choice or definitions. These could benefit from a definitions section in the future.

# 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

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# 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

# Appendix C. After Action Survey

## Summary

Summary of Survey Detail	
Number of Respondents.	7
Percent that had previously developed a Mitigation Plan.	43%
Respondents that Submitted a WMP.	100%
Respondents that used the DNR provided WMP Template.	100%
<i>Average Respondent Score for the following prompts (Scale of 1-5 with 5 being the Highest):</i>	
Clarity of expectations? (e.g., what was being asked and how to fill it out)	3.0
Ease of accessing the template?	3.4
Ease of completing the template?	3.1
Overall communication about the new template and steps leading up to its implementation?	2.6
Ease of getting questions answered if needed?	2.9
Count of Respondents that felt there was not adequate time.	2
Count of Respondents who attended feedback sessions.	4
Count of Respondents that were not aware feedback sessions were available.	2

Summary of Survey Feedback
<ul style="list-style-type: none"> <li>• A closer working relationship between DNR and the utilities would aid in Mitigation Plan development and would also assist in a clearer understanding of system operation and wildfire cause investigation.</li> <li>• A streamlined report template would assist in Wildfire Mitigation Plan development for small utilities.</li> <li>• Validation prior to process initiation of the Point of Contact (POC) at each utility so that all communication, invitations, and wildfire mitigation plan material is appropriately received by the utilities.</li> </ul>

- An expert on the legislature that can work with DNR/Commerce and the utilities to outline clear expectations and provide support when questions are raised that could affect the utilities as its related to wildfires and wildfire mitigation.
- Access to more in-person resource session (training/working sessions/process meetings).

<sup>[1]</sup> 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.

<sup>[2]</sup> 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.

# Appendix II: Electrical Utility Subject Matter Expert Roster

2023 Electrical Utility Wildfire Prevention Advisory Committee

Electrical Utility Subject Matter Roster

	Wildland Fire Investigation SME	Electrical Engineering & Utility Operations SME	Utility Vegetation Management SME
<b>Chloeta</b>	✓	✓	✓
<b>EFI Global</b>		✓	
<b>Guidehouse</b>		✓	✓

<u>Business</u>	<u>Contact Number</u>	<u>Contact Person</u>	<u>Email Contact</u>
Chloeta Fire, LLC	(877) 245-6382	Emily Cochran	<a href="mailto:ecochan@chloeta.com">ecochan@chloeta.com</a>
EFI Global, Inc.	(503)894-0920	Kendall Biggs	<a href="mailto:Kendall.biggs@efiglobal.com">Kendall.biggs@efiglobal.com</a>
Guidehouse Inc.	(916) 549-7393	C. Lopes	<a href="mailto:clopes@guidehouse.com">clopes@guidehouse.com</a>

# Appendix III: Utility Technical Assistance Interagency Agreement DNR & DOC



INTERAGENCY AGREEMENT  
DEPARTMENT OF NATURAL RESOURCES  
(DNR) NO. 93-108196

**PI:** 2T6

**Funding Source:**

State

**GrantFunded:**

Yes  No

**OMWBE:**

Not Applicable

**Procurement method:**  Exempt, Department of Enterprise Services Sole Source Policy No. POL-140-00, Section 5A, Item 1, RCW 39.29.125(10)

This Agreement is made and entered into between the Washington State Department of Natural Resources, hereinafter referred to as DNR, and the below named firm, hereinafter referred to as the Washington State Department of Commerce (COM).

DNR and COM enter into this agreement under Chapter 39.34, Interlocal Cooperation Act.

Washington State Department of

Commerce 1011 Plum Street SE

Olympia, WA, 98504

**Phone:** 360-764-0126

**Email:** [elizabeth.king@commerce.wa.gov](mailto:elizabeth.king@commerce.wa.gov)

**Statewide Vendor # (SWV): SWV0007526**

**IT IS MUTUALLY AGREED THAT:**

- 1.0 **Purpose.** The purpose of this Agreement is to provide technical assistance to electric utilities in the state as they develop and implement wildfire mitigation plans. This interagency agreement will reduce duplication of efforts around existing technical support provided by both agencies and will support efforts to reduce the risk of wildland fires and damage and losses resulting from those fires.
- 2.0 **Scope of Work.** The COM shall furnish the necessary personnel, equipment, material and/or services and otherwise do all things necessary for or incidental to performing work set forth in the Exhibit A – Scope of Work.
- 3.0 **Period of Performance.** The period of performance under this contract will be from December 31, 2024, or date of execution, whichever is later, through June 30, 2029.
- 4.0 **Payment.** Pay for the work provided is established under RCW 39.34.130. The parties estimate that the cost of accomplishing the work will not exceed Seven Hundred Seventy-Three Thousand Eight Hundred Sixty-Two Dollars (\$773,862.00) in total for the performance period. Pay for services shall be based on the rates and terms described in Exhibit B – Budget.
- 5.0 **Billing Procedures.** COM shall promptly submit invoices quarterly to DNR for services rendered. Payment for approved goods and/or services will be made by check, warrant or account transfer within 30 days of receipt of the invoice. Upon expiration of the Agreement, invoices shall be paid, if received within 30 days after the expiration date. However, invoices for all work done within a fiscal year must be submitted within 30 days after the end of the fiscal year.

Each invoice submitted to DNR shall include information needed by DNR to determine the exact nature of all expenditures and completed work. At a minimum, each invoice shall specify the following:

- A. Agreement number **93-108196**
  - B. The (e.g., monthly fixed cost, etc.) for each (month billed, deliverable, etc.)
  - C. The total number of hours worked for each employee
  - D. The total amount of taxes (if any)
  - E. Any other relevant information.
  - F. The total invoice charge.
- 6.0 **Records Maintenance.** COM shall maintain books, records, documents and other evidence, to sufficiently document all direct and indirect costs incurred by COM in providing the services. These records shall be available for inspection, review, or audit

by personnel of the DNR, other personnel authorized by the DNR, the Office of the State Auditor, and federal officials as authorized by law. COM shall keep all books, records, documents, and other material relevant to this Agreement for six years after agreement expiration. The Office of the State Auditor, federal auditors, and any persons authorized by the parties shall have full access to and the right to examine any of these materials during this period.

Records and other documents in any medium furnished by one party to this agreement to the other party, will remain the property of the furnishing party, unless otherwise agreed. The receiving party will not disclose this material to any third parties without first notifying the furnishing party

and giving it a reasonable opportunity to respond. Each party will use reasonable security procedures and protections to assure that records and documents provided by the other party are not erroneously disclosed to third parties.

7.0 **Rights to Data.** Unless otherwise agreed, data originating from this Agreement shall be ‘works for hire’ as defined by as defined by Title 17 U.S.C., Section 101 and shall be owned by the DNR. Data shall include, but not be limited to, reports, documents, pamphlets, advertisements, books, magazines, surveys, studies, computer programs, films, tapes, and/or sound reproductions. Ownership includes the right to use, copyright, patent, register and the ability to transfer these rights.

8.0 **Independent Capacity.** The employees or agents of each party who are engaged in performing this Agreement shall continue to be employees or agents of that party and shall not be considered for any purpose to be employees or agents of the other party.

9.0 **Amendments.** This Agreement may be amended by mutual agreement of the parties. Amendments shall be in writing and signed by personnel authorized to bind each of the parties.

10.0 **Termination for Convenience.** Either party may terminate this Agreement upon 30 calendar days’ prior written (including email) notice to the other party. If this Agreement is terminated, the parties shall be liable only for performance rendered or costs incurred in accordance with the terms of this Agreement prior to the effective date of termination.

11.0 **Termination for Cause.** If for any cause either party does not fulfill in a timely and proper manner its obligations under this Agreement, or if either party violates any of the terms and conditions, the aggrieved party will give the other party written notice of the failure or violation. The aggrieved party will give the other party 15 working days to correct the violation or failure. If the failure or violation is not corrected within 15 days, the aggrieved party may immediately terminate this Agreement by notifying the other party in writing (including email).

12.0 **Disputes.** If a dispute arises, each party will make a good faith effort to resolve issues at the lowest possible level in their respective agencies. If they cannot resolve an issue, they will elevate the issue within their respective chains of command to resolve it.

In the event that a dispute arises under this Agreement, it shall be determined by a Dispute Board in the following manner: Each party to this Agreement shall appoint one member to the Dispute Board. The members so appointed shall jointly appoint an additional member to the Dispute Board. The Dispute Board shall evaluate the facts, Agreement terms, applicable statutes and rules, and make a determination of the dispute. The determination of the Dispute Board shall be final and binding on both parties. The cost of resolution will be borne as allocated by the Dispute Board. Alternatively, the parties may pursue a third-party dispute resolution as the parties mutually agree to in writing.

If the parties cannot resolve the issue within their chains of command, either party may request intervention by the Governor, as provided by RCW 43.17.330. In this case, the Governor's process will control the dispute resolution.

13.0 **Governance.** This contract is entered into by the authority granted by the laws of the State of Washington and any applicable federal laws. The provisions of this agreement shall be construed to conform to those laws.

If there is an inconsistency in the terms of this Agreement, or between its terms and any applicable statute or rule, the inconsistency shall be resolved by giving precedence in the following order:

- (4) Applicable federal statutes and rules;
- (4) State of Washington statutes and regulations;
- (4) Scope of Work; and
- (4) Any other provisions of the agreement, including materials incorporated by reference.

14.0 **Assignment.** The work to be provided under this Agreement and any claim arising from this Agreement cannot be assigned or delegated in whole or in part by either party, without the express prior written consent of the other party. Neither party shall unreasonably withhold consent.

15.0 **Waiver.** A party that fails to exercise its rights under this agreement is not precluded from subsequently exercising its rights. A party's rights may only be waived through a written amendment to this agreement.

16.0 **Harassment.** Per [RCW 43.01.135](#), Sexual harassment in the workplace, Agency Contractors hereby have access to DNR Policy PO01-052 Sexual Harassment:  
[https://www.dnr.wa.gov/publications/em\\_harassment\\_prevention\\_policy.pdf](https://www.dnr.wa.gov/publications/em_harassment_prevention_policy.pdf)

17.0 **Severability.** The provisions of this agreement are severable. If any provision of this Agreement or any provision of any document incorporated by reference should be held invalid, the other provisions of this Agreement without the invalid provision remain valid.

18.0 **Responsibilities of the Parties/Indemnification.** Each party to this Agreement hereby assumes responsibility for claims and/or damages to person and/or property resulting from any act or omissions on the part of itself, its employees, its officers, and its agents. Neither party assumes any responsibility to the other party for the consequences of any claim, act or omission of any person, agency, firm or corporation not a party to this Agreement.

19.0 **Insurance.** The State of Washington, including all its agencies and departments, is self- insured for all exposures to tort liability, general liability, property damage liability and vehicle liability, as provided in statute, but only as respects the negligence of State.

21.0 **Complete Agreement in Writing.** This Agreement contains all the terms and conditions agreed upon by the parties. No other understanding, oral or otherwise, regarding the subject matter of this Agreement shall be deemed to exist or to bind any of the parties.

22.0 **Contract Management.**

<b>CONTRACTOR Contract Manager</b>	<b>DNR Contract Manager</b>
Elizabeth King Washington State Department of Commerce 1011 Plum Street SE Olympia, WA, 98504 <i>Phone:</i> 360-764-0126 <i>Email address:</i> <a href="mailto:elizabeth.king@commerce.wa.gov">elizabeth.king@commerce.wa.gov</a>	Loren Torgerson Department of Natural Resources 1111 Washington Street SE Olympia, WA, 98504 <i>Phone:</i> 360-902-1011 <i>Email address:</i> <a href="mailto:loren.torgerson@dnr.wa.gov">loren.torgerson@dnr.wa.gov</a>
<b>CONTRACTOR Project Manager</b>	<b>DNR Project Manager</b>
Elizabeth King	Loren Torgerson

Washington State Department of Commerce 1011 Plum Street SE Olympia, WA, 98504 <i>Phone:</i> 360-764-0126 <i>Email address:</i> <a href="mailto:elizabeth.king@commerce.wa.gov">elizabeth.king@commerce.wa.gov</a>	Department of Natural Resources 1111 Washington Street SE Olympia, WA, 98504 <i>Phone:</i> 360-902-1011 <i>Email address:</i> <a href="mailto:loren.torgerson@dnr.wa.gov">loren.torgerson@dnr.wa.gov</a>
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22.0 **Subcontracts.** Subcontractor means not in the employment of the Agency, who is performing all, or part of the activities related to this Agreement under a separate contract with the Agency responsible for the scope of work as identified within. If utilizing subcontractors to perform the scope of work, the Agency is required to obtain subcontractors in compliance with RCW 39.26. Agency must provide both proof of competitive solicitation and that the solicitation was posted in WEBS, sole source filing and DES approval, or a documented exemption per DES policy, whichever the case may be.

By signature below, the Parties certify that the individuals listed in this document, as representatives of the Parties, are authorized to act in their respective areas for matters related to this instrument.

**IN WITNESS WHEREOF, the Parties have executed this Agreement.**

**STATE OF WASHINGTON DEPARTMENT OF COMMERCE  
STATE OF WASHINGTON DEPARTMENT OF NATURAL RESOURCES**

			1/24/2025
<b>Signature</b>	<b>Date</b>	<b>Signature</b>	1/29/2025
<u>Jennifer Grove</u>		<u>Kathryn W. Taylor</u>	
<b>Name</b>		<b>Name</b>	
<u>Energy Division Assistant Director (Interim)</u>		<u>DNR Chief Operating Officer</u>	
<b>Title</b>		<b>Title</b>	
<u>1011 Plum Street SE</u> <u>Olympia, WA, 98504</u>		<u>1111 Washington Street SE</u> <u>Olympia, WA, 98504</u>	
<b>Address</b>		<b>Address</b>	

## EXHIBIT A

### SCOPE OF WORK

#### Purpose

House Bill 1032 requires all electric utilities to publish Wildfire Mitigation Plans. Because each electric utility is unique in fire risk, service territory makeup, and mitigation and staffing resources, they need long-term and customized technical assistance to understand fire risk in their service territory, develop high-quality mitigation plans, understand policy and program implications, and prioritize and fund mitigation projects. The Department of Commerce Energy Resilience and Emergency Management Office (Office) due to its statutory role for energy security, resilience, mitigation, response, and recovery has existing and long-standing relationships with the state's electric utilities. The Office facilitates existing workgroups for electric utilities including a workgroup for wildfire mitigation planning elements. HB 1032 requires DNR to provide technical assistance for utility mitigation plans, having this established interagency agreement will help reduce duplication of efforts around existing work from both state agencies and have a formalized connection to support the partnership required for success at the state level for electric utility wildfire mitigation planning.

#### Task 1: Wildland Fire Mitigation Plan Technical Assistance

##### Tasks and Deliverables from the Department of Commerce, Energy Resilience and Emergency Management Office

1. Have a dedicated full time equivalent (FTE) employee to carry out the required tasks.
2. Facilitate all peer learning and information sharing with the state's electric utilities related to the development of the required Wildfire Mitigation Plan Template, plan writing resources, and broader risk and policy issues related to energy resilience. Activities may include:
  - a. Host monthly Utility Wildfire Mitigation Planning coordination workgroup meeting calls. Host monthly open office hours times to answer questions from utilities. Maintain a record of the communications for DNR review.
  - b. Host two biannual two-day workshops with utilities, with one day focused on WMP development and Q&A.

- c. In coordination with DNR, develop and publish guidance, FAQ sheets, or other resources to Commerce and DNR websites to support electric utilities' development of Wildfire Mitigation Plans.
- d. Conduct in person assistance meetings with utilities as requested and maintain a record of meetings, including issues discussed, for DNR review.
- e. Develop data visualizations as requested by utilities and maintain a record for DNR review.
- f. Generate a report quarterly that consists of the employee's tasks accomplished to date. This should include a catalog of any meetings and workshops that were

hosted and/or facilitated, any guidance, FAQ sheets, or other resources that were created, and any data visualizations that were developed as requested by utilities.

- g. Collect utility feedback related to wildland fire mitigation planning and provide a detailed report of relevant feedback to the DNR and the Utility Wildland Fire Advisory Committee by December 1<sup>st</sup> of each year.

### **Tasks and Deliverables from the Department of Natural Resources**

1. DNR will provide information and data about wildland fires involving utility equipment to meet the requirements in HB 1032 and support the development of data visualizations.
2. In coordination with COM, serve and be available as a subject matter expert to provide information on wildland fire and resource protection policies, wildland fire suppression activities, wildland fire investigations, and vegetation management for the purpose of wildland fire mitigation planning or other relevant topics.

**EXHIBIT B**

**BUDGET**

DNR shall pay an amount not to exceed \$773,862 for the performance period of all things necessary for the performance of work as set forth in the Scope of Work. This is a performance Agreement, and all payments will be based on the completed tasks as described in the Scope of Work. Invoices shall be submitted monthly based on actual costs incurred during that month.

<b>Budget</b>	
Task 1: Plan technical assistance	
For FY 25 not to exceed	\$99,721
For FY 26 not to exceed	\$196,069
For FY 27 not to exceed	\$192,696
For FY 28 not to exceed	\$190,862
For FY 29 not to exceed	\$94,514
<b>Total Budget</b>	<b>\$773,862</b>