



Wildfire Mitigation Plan and Procedures

June 3, 2025

Purpose: The purpose of this Fire Mitigation Policy is to reduce the risk of wildfires caused by High West Energy's (HWE) electrical infrastructure. HWE is committed to implementing proactive measures to protect, as much as possible, our members, communities, and the environment while ensuring the reliability of electric service.

Helpful Definitions

1. High-risk Area is a region identified by qualified personnel as potentially having a higher-than-normal risk of damage from fires involving HWE equipment. Reasons for rating as a High-risk Area may include:
 - a. Line installed along difficult to access right-of-way.
 - b. Line installed on Federal and State Lands (United States Forest Service, Bureau of Land Management, and State Trust).
 - c. Areas that may have a longer-than-typical response time for a fire department, or areas that may be difficult for a fire department to manage.
 - d. Geographical areas where fires are less likely to be observed by the public until they grow larger.
2. Red Flag Warning is an event declared by the National Weather Service, one zone at a time, influenced by factors such as high winds, low humidity, and/or the presence of dry lightning. The National Weather Service sets the zones to which a red flag warning is applied; HWE operates in the NWS Cheyenne and NWS Boulder zones.
3. Electronic Breaker or Over Current Device (OCD) equipped with Supervisory Control and Data Acquisition (SCADA) is a controlled device that can be manipulated to different fault operations, including opening and closing remotely.
4. Zone of Protection is a stretch of line between two OCDs that are either SCADA-controlled or manually reset.
5. Fault indicators are devices that indicate the passage of fault current. When properly applied, fault indicators can reduce outage times and service interruptions by identifying the section of line where a fault has occurred. Typically, the unit will have an indicator that flashes or is a solid light.
6. HWE Dispatcher is an employee assigned the duties of tracking and directing field personnel, assigning outage and maintenance requests, and operating SCADA controls. The assigned Dispatcher may be defined as any competent employee trained for these duties.

High Risk Areas of HWE's Service Territory

1. Table 3 in this document illustrates the areas that HWE feels are of highest concern for a wildfire to occur.
 - a. A Area – This geographic region consists mainly of open range land on the eastern side, adjacent to the I-25 corridor. The western portion of this area consists of both Private and Public forested areas with relatively rough terrain, making fire suppression a difficult task. This area often receives high wind events that could spread wildfire if started at an extremely fast pace. The majority of HWE powerlines in this area follow the I-80 corridor with most of the taps coming off of

the line heading south, with 1 line feeding 3 meters just across the WY/CO border in Larimer Co. Colorado. Vegetation management is of top priority in this area due to timber growth and difficult accessibility to the right-of-way during the winter and spring months due to snowfall.

- b. B Area - This area consists of open native grass hilltops mixed with dense forests of ponderosa pines and cedar trees in the valleys. Due to its distance from fire stations and rough terrain, this area is of high concern due to its low population density, which may delay notification to fire departments to begin suppression. Also, access is very limited due to steep terrain. Most of HWE's powerlines are 3-phase construction supplied from the Weikhorst Substation.
- c. C Area - This area consists of a long ridge that runs north and south, timbered with pine and cedar trees. HWE has minimal lines that cross through this area, with most of them being on the north end of the ridge. The big concern is that the small town of Pine Bluffs sits right on the north end of the ridge with multiple houses within the tree-covered draws and ravines, with little to no vegetation management for fire suppression around them. The main substation feed of concern in this area is the east circuit that feeds up and over the ridge approximately 1 mile south of the Town of Pine Bluffs. This circuit is built through a very hard-to-access terrain inaccessible to fire suppression until the blaze reaches the ridge's top or bottom.
- d. D Area - This area of concern is geographically similar to Area B since it is on the same ridgeline. HWE believes that, due to the area being between Harrisburg, NE, and Albin, WY, the area is not quite as far from fire suppression resources as other areas. This area has very few roads that run north to south through the ridge that would act as a fire break. This area is susceptible to high wind events similar to Area A, allowing a wildfire to potentially consume large portions of fuel in a short amount of time before fire departments would be able to access the area. Geographically, the area east of Banner County Road 15 all the way to Hwy 71 is more rolling hills that would allow slightly easier access to fire trucks. The area west of Road 15 to Laramie County Road 158 is comprised of steeper terrain, including some escarpments that are unnavigable even on foot.
- e. E Area - This area of concern encompasses nearly 75% of the West Unit of the Pawnee National Grasslands. This area contains both Private and Public lands. While the expanse of grasslands is a concern for wildfire, annual grazing keeps fuel load down on the land, and this unit of the grasslands is more rolling hills, so an active wildfire would not be extremely hard to access with suppression equipment. There are quite a few roads that grid this area, creating fire lines to help with suppression. Most of HWE's powerlines are along roadways that employees and the public often travel. If a fire were to start in this area, the reporting timeline to authorities would be relatively quick.
- f. F Area - The East Unit of the Pawnee National Grasslands is mainly comprised of rolling hills, but there is an escarpment that runs in an L shape from the WY/CO boarder approximately 13 miles south before turning east in the Pawnee Butte area and continuing east approximately 50 miles to the Peetz, CO area. The area around the Pawnee Butte is relatively rough but treeless. The area west of Pawnee Butte in the escarpments that extend up to the WY/CO border does contain some cedar trees in the drainages. If a wildfire began in this area, it could be difficult to access for

fire suppression. None of HWE's powerline right-of-ways are in an area that would cause a need for tree trimming. Additionally, nearly all of HWE's right-of-ways are located in a flat, relatively easy area to access and are annually grazed by livestock, making the fuel load minimal. One concern that should be noted is the distance to a fire station in this area, as the nearest would be Grover, CO, Kimball, NE, and New Raymor, CO.

System Inspection and Maintenance

1. HWE may utilize drones to continue reasonable inspections of its overhead system yearly.
2. Unless there are extenuating circumstances, HWE will annually choose a Substation(s) to have all poles on that Sub's circuits inspected for rot, deterioration, and structural integrity by a licensed pole testing/inspecting company. Failed poles will be replaced in a timely manner.
3. Line crews will also visually inspect the line, equipment, and poles during routine maintenance.
4. HWE will make its best effort to evaluate and mitigate issues discovered in the electrical distribution and transmission system in a timely manner based on the severity of the hazards discovered.

Vegetation Management

1. Maintain a vegetation management plan that prioritizes clearing brush and trimming or removing trees near power lines, poles, and other electrical equipment.
2. Trees that need trimming or removal will be marked on the HWE mapping system during physical line inspections and/or drone inspections.
3. The trees and brush will be trimmed or removed by an outside contractor hired by HWE or performed by HWE personnel.
4. Special right-of-way clearing on public lands managed by either the US Forest Service or Bureau of Land Management will be conducted according to the rules set forth by said entities in the agreement of HWE's Operating Plan.
5. Right-of-way clearing will be performed according to specifications set forth in RUS Bulletin 1728F-804 (12.47 kV line construction) and/or REA standard T-805A 34.5 (34.5-69kV line construction) or additional government agency specifications in place.
6. Priority will be made for all tree trimming in the Primary and Transmission right-of-way to be conducted as ground to sky.
7. Service conductors under 600v may be trimmed for a two-foot (2) clearance around the conductor.
8. Hazard tree is defined as any dead or dying tree that needs to be removed to protect the powerline, regardless of whether it is in the right-of-way. A tree would be deemed hazardous if the overall height of the tree was within that measured distance of the pole or span of wire plus 10 feet. (See Table 1)
9. High West Energy Substation Vegetation Control:
 - a. Outside borders of the fence parameters will be mowed or ground sterilized (sprayed) annually to a distance of at least five (5) feet.

- b. Inside the substation fence, weed control will be performed annually by ground sterilizing (spraying).

Proactive actions to enhance the ability to respond to events:

1. Operations: Prepare maps describing high-risk and/or difficult-to-patrol areas. Install fault indicators on sections of the line within the High-Risk Area.
2. Engineering: Actively moving ahead to build SCADA logic to turn reclosing on and off for multiple reclosers at once. This will be based on overhead lines routed within the Fire Mitigation zones. (See Table 2)
3. Member Services: Develop a communications plan to explain to members that following this plan may cause increased or more frequent outage durations during high-fire-risk events.
4. Engineering/Operations: Install additional SCADA-controlled reclosers upstream of certain High-risk Areas when economically justified.
5. Engineering/Operations: Install disconnect switches to isolate certain taps that are difficult to patrol or are in high-risk areas when feasible.
6. Engineering/Operations: Bury distribution feeders through certain high-risk areas when economically justified.
7. Engineering/Operations: Install fusible cutout switch online taps to isolate faults to smaller stretches of line to pinpoint outages quicker.

Wildfire Mitigation Strategy Changes

1. The installation of SCADA-controlled electronic OCDs in Area A was the beginning of HWE's effort to limit fire exposure by not allowing a device to close back in on a fault when a high fire danger threat is present.
2. Installation of the fault indicators on the line in Area A took place at the beginning of 2025 as a way to pinpoint the direction that a fault may have come from on a line. This was made a priority in Area A since the topography of this area makes line patrolling difficult. HWE wanted to be able to restore power to our customers as quickly as possible while still being able to make sure we were patrolling and fixing problems on the line without reclosing an OCD on a section of line that may possibly have two different faults on the line.
3. As of June 2025, only Fire Mitigation Zone 1 has field-operated SCADA-controlled OCDs programmed to fall under HWE's Fire Mitigation program. All other Circuits and OCDs on HWE's system will be reenergized following the **Line Re-energizing Protocol**.
4. This Wildfire Mitigation plan was originally instated in June 2025. This plan is consistent with HWE's historic commitment to protecting life and property in the event of a fire. During our annual review of this policy, addendums and corresponding paragraphs will be added to this space as necessary.

Triggers/Events - The following events may activate a High Fire Risk Event:

1. Red flag warning declared within the NWS Cheyenne and/or Boulder zone.
2. Judgment of HWE's Operations Manager, Engineering Manager, or General Manager.

- a. Either a red flag warning OR the manager's judgment can trigger the start of a High Fire Risk Event. The event does not end until the same manager's judgment calls for it to end, AND there is no red flag warning in effect.
- b. HWE may elect to leave its Fire Mitigation Program in place for extended periods of time throughout the year if the Cooperative deems environmental conditions may yield a High Fire Risk to that geographical area of the service territory. This may include placing non-SCADA-controlled manual OCD reclosures into non-reclosing in the field. When manual OCD reclosures are placed into non-reclosing for Fire Mitigation, those OCD locations shall be marked on the map via the associated smart tag and removed when the High Fire Risk Event is over.

Responsive Actions to Take During High Fire Risk Events

1. Initiate Fire Mitigation procedures for the affected Fire Mitigation Zones.
2. Operations and Dispatch to follow **the line re-energization protocol during an outage**.
3. Proactive outages, aka "Public Safety Power Shutoff."
4. HWE dispatching will contact Black Hills Power and/or Wyrulec dispatching if joint-use poles are in danger from a fire threat. If HWE needs Black Hills Power or Wyrulec to de-energize a circuit for maintenance or repairs, this will be communicated and coordinated between the power companies' dispatch personnel and with employees in the field collaborating to establish visual opens on the circuits for the affected parties to begin work.

Instituting a High-Risk Fire Event (Fire Mitigation)

1. The HWE-assigned dispatcher will begin by contacting the power supplier and asking for no-reclose to be initiated if this affects the Red Flag Warning area. Once completed, this will be documented in the dispatching daily log (Date and Time).
2. All SCADA-operated OCDs within the affected warning area will be put on non-reclose. Once completed, this will be documented in the dispatching daily log (Date and Time).
3. A radio call will be sent to all crews that HWE is in (Wildfire Mitigation) and the area that this affects.
4. An email will be sent to all staff regarding the details (affected areas, counties, states, etc.). HWE will make every attempt to publish this information on all available public communication platforms so members can access information about a High-Risk Fire event.
5. In the event that a Red Flag Warning or HWE Fire Mitigation event continues past normal working hours, all OCDs will be left on non-reclosing until a HWE manager deems the High-Risk event to be over.

Removal of a High-Risk Event (Fire Mitigation)

1. A HWE manager will determine when the High-Risk event has passed, including when:
 - a. Cancellation of a Red Flag Warning has been issued by the NWS; or
 - b. Determination is made that environmental conditions (rain/snow/high humidity) have changed, and the risk of starting a fire by an electrical fault has diminished significantly.

2. HWE dispatcher will contact the power supplier and have OCDs put back to normal operation if this was part of the Fire Mitigation event. Once completed, this will be documented in the dispatching daily log (Date and Time).
3. All SCADA-operated OCDs within the affected warning area will be restored to normal operation. Once completed, this will be documented in the dispatching daily log (Date and Time).
4. A radio call will be sent to all crews to inform them that the (Wildfire Mitigation) is cancelled and that OCDs are back to normal reclosing.
5. An email will be sent to all staff stating that the Wildfire Mitigation is cancelled.

After Hours or Weekend Instituting of Fire Mitigation Event

1. If a Red Flag warning is issued after hours or during the weekend and was not executed before the end of normal business hours, then it will be the on-call linemen for that area's responsibility to initiate the Fire Mitigation protocols.
2. Once the breakers have been placed into non-reclosing status, an all-staff email should be sent to inform staff about which OCDs were put on non-reclosing.
3. Once non-reclosing is initiated on OCDs after business hours, Fire Mitigation is to be left on until the following normal business day for re-evaluation to determine whether it can be removed.

Requirements for Line Re-energizing Protocol during High Fire Risk Events - The following rules shall apply during a High Fire Risk Event if a fault occurs in the zone of protection of a recloser:

1. Field personnel shall patrol as much of the line within the zone of protection as they can. If deemed necessary, a drone may patrol inaccessible lines.
 - a. If a zone of protection is operating with fault indicators in use, then the field personnel may use these as a stopping/starting point of the patrol based on the assessment of a fault indicator instead of a downstream OCD.
 - b. If a fault within the zone of protection is identified and repaired, the remainder of the zone should still be patrolled before energizing when feasible.
 - c. Field personnel may choose not to patrol certain segments of the line that they determine cannot be safely patrolled. Reasons they may determine the line unsafe to patrol include, but are not limited to:
 - i. They cannot drive along the line without risk of their vehicle starting a fire (tall/dry grass).
 - ii. The line is not reasonably accessible (sand, locked gates, etc.).
 - iii. Terrain is too steep or unsafe to walk.
2. If field personnel cannot identify a fault within the zone of protection, then the line may be energized with mutual concurrence of field personnel AND an office operations employee overseeing the field personnel (Dispatcher, Operations Manager, Engineering Manager). Personnel may decide to energize or not energize based on many factors, including but not limited to the following:
 - a. Risk of starting a fire that may not exist prior to energizing the line (recent rainfall, general condition of the line, etc.).

- b. Risk of harm to person(s) or property that may come from not energizing the line (heat-related illness, crop damage, livestock harm, frozen pipes, etc.).
3. Fire departments, in certain situations, take water from nearby wells in order to fight fires. Operations field and office personnel shall make reasonable efforts to energize a section of line to a well at the request or direction of emergency responders, up to and including waiving the previous rules in this section, as long as the operations personnel believe that such acts would not create a safety hazard in the vicinity of an active fire.

Community Outreach and Public Awareness Efforts Before and During the Wildfire Season, Particularly in Areas Impacted by Wildfires or De-energizations

1. HWE understands the importance of communication during emergencies. In emergencies that may lead to unplanned outages or require de-energization for the safety of HWE Members, Employees, Emergency Personnel, or the public, the CEO, Operations Manager, and Safety Director — with support from the dispatch team — will take appropriate actions and ensure the Communication Coordinator receives accurate information to share with all affected parties.
2. For scheduled maintenance outages, HWE provides affected members with information at least 48 hours in advance. Information about unplanned outages, red flag warnings, de-energization, or elevated fire danger that could result in a power shutoff within HWE's service area will be communicated to Members as quickly as possible to support their preparation and response efforts.
3. Each year, initial measures will be taken by communicating to members in the Sparks newsletter what HWE is doing to mitigate fires or emergency shut-offs in its service area and what measures will be taken if an emergency occurs during fire season.
4. In the event of a red flag warning, when HWE feels fire danger is high, or if power shut-offs are deemed necessary, HWE will communicate this information on its Facebook page, providing members with quick and easy access to information. This information will also be given to our member service representatives to assist members. If needed, the "Outage Center" on HWE's website will be updated as new information is provided. Further communication will be made with emergency management agencies, communication companies attached to HWE infrastructure, and local news media outlets in the affected areas if needed.

Public Safety Power Shutoff

1. HWE reserves the right to de-energize any circuits/lines at all times in the event that the qualified personnel feel is the safest option during a weather/wind event.

Active Wildfire Operations Plan

1. Once a wildfire is reported to HWE by the commanding agency requesting the line(s) be de-energized, the following steps will take place:
 - a. HWE personnel will be dispatched to the scene of the fire or a pre-requested location to meet with the commanding agency to establish what area first responders will need to begin accessing. During this meeting, the commanding agency will begin making assignments that HWE field personnel will follow. HWE

may also give recommendations to the commanding agency to assist with the situation. The final assignments may change throughout the incident. As these changes occur, information must be reported back to HWE dispatching.

- b. When de-energization is requested or required by a governmental authority (Fire Department/US Forest Service Personnel/law enforcement), the name, agency or authority, truck number (if on site), and phone number of the individual making the request or demand shall be documented and given to HWE dispatching, where it will be noted and saved on the daily log.

Post-Wildfire Electrical System Restoration

1. Once a wildfire is extinguished or is no longer a threat, contact must be made between the incident commander and HWE before HWE personnel are sent into the affected area to begin inspections and repairs. In the event that minor repairs may be made to restore power during the incident, these efforts will be focused on re-energizing circuits that would facilitate fire suppression. These would include:
 - a. Water wells or Dam sites.
 - b. Fire Stations/ Dept headquarters/ incident command centers.
 - c. Members' residents who are still under threat from the fire.

Important Phone Number/Contacts

Tri-State Dispatching: 800-230-6180

WAPA Dispatching: 970-461-7279

1. Kimball WAPA Sub
 - a. Kimball N-442
 - b. Clean Harbors/ Tallgrass-542
 - c. Enders-342
2. Sidney WAPA
 - a. Brownson-542
3. Pine Bluffs 12.5kv
 - a. Pine Bluffs West 612
 - b. Pine Bluffs East 412
 - c. Town of Pine Bluffs 512

PacifiCorp/Rocky Mountain Power: 503-251-5230

1. Laramie Substation (Breaker 5H92)

Black Hills Power: 800-694-8989

Wyrulec: 307-837-2225

High West Energy Dispatching: 307-245-3261

US Forest Service

1. Laramie office (Wyoming): 307-745-2300

2. Ault office (Colorado): 970-834-9270

Bureau of Land Management (Wyoming): 307-775-6256

Colorado State Trust Land: 970-454-5279

Nebraska BELF (School Sections): 402-471-2014

Wyoming Office of State Lands and Investments: 307-777-7331

Training

1. This document is to be reviewed annually by all employees with job duties mentioned in this document. Employees responsible for wildland fire mitigation and response will receive training from qualified HWE personnel and outside consultants as needed to ensure that HWE personnel meet industry standards.
2. Amendments shall be made as HWE makes electrical system changes or governing bodies change the set rules regarding Fire Mitigation (RUS, USFS, BLM, etc.).