

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF AVISTA ) CASE NO. AVU-E-25-15**  
**CORPORATION’S APPLICATION FOR )**  
**APPROVAL OF THE 2026 WILDFIRE )**  
**MITIGATION PLAN ) ORDER NO. 37064**  
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On December 9, 2025, Avista Corporation (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting an order approving its 2026 Wildfire Mitigation Plan (“WMP”) (“Application”).

On January 6, 2026, the Commission issued a Notice of Application and Notice of Intervention Deadline. Order No. 36901. The Commission granted intervention to PotlatchDeltic Forest Holdings, LLC (“PotlatchDeltic”). Order No. 36888.

On February 4, 2026, the Commission provided notice that the Application would be processed under Modified Procedure and set comment deadlines. Order No. 36927. Commission Staff (“Staff”) and PotlatchDeltic filed comments, to which the Company replied. The Commission also received two public comments from the Idaho Department of Lands (“IDL”), one filed timely and the other filed after the deadline.

This matter is now fully submitted.

**BACKGROUND**

On July 1, 2025, the WSCA, *Idaho Code* §§ 61-1801 et seq., became effective. Through enactment of the WSCA, the Idaho Legislature established a framework intended to support the continued delivery of safe, reliable, and cost-effective electric service while addressing the growing risks associated with wildfires. *Idaho Code* § 61-1802. The Legislature recognized that wildfire preparedness and response have become increasingly significant components of utility system planning and operations, particularly for electric utilities responsible for transmission and distribution infrastructure throughout the state. *Id.*

The Legislature further acknowledged the Commission’s role in overseeing electric utility compliance with applicable statutes, regulations, and safety standards. *Id.* In adopting the WSCA, the Legislature emphasized that utilities should proactively identify, mitigate, and respond to

wildfire risk in a manner that protects public safety and property while also ensuring that utility expenditures remain prudent and rates remain affordable for customers. *Id.*

Under the WSCA, electric corporations regulated as public utilities under *Idaho Code* §§ 61-119 and 61-129 are required to “adopt and file” WMPs with the Commission for review. *Idaho Code* § 61-1803(2)(a). The statute also permits municipal and cooperative utilities to voluntarily submit WMPs for Commission consideration. *Idaho Code* § 61-1803(2)(b). If a WMP is filed by a municipal or cooperative utility the Commission can assess reasonable fees to such entity which “may not exceed the actual reasonable cost incurred by the Commission for the review and consideration of a plan submitted to it.” *Id.*

Commission-approved WMPs shall be implemented upon approval and be reviewed and updated annually. *Idaho Code* § 61-1803(4). A Commission-approved WMP establishes the operational and risk-mitigation measures the utility will undertake to prepare for and respond to wildfire-related threats and helps define the utility’s responsibilities to the public and its customers. *Idaho Code* § 61-1805.

The WSCA also creates a rebuttable presumption in wildfire-related litigation that an electric corporation acted without negligence if it reasonably implemented a Commission-approved WMP. *Idaho Code* § 61-1806(1). To ensure ongoing oversight and continued adaptation to changing conditions, the statute requires utilities to review and update their WMPs annually and to submit periodic compliance reporting as directed by the Commission. *Idaho Code* §§ 61-1803(4), 61-1804.

Consistent with the WSCA, on September 30, 2025, the Commission issued Order No. 36774 establishing a procedural schedule for WMP filings. The Order directed utilities to submit initial WMP no earlier than October 1, 2025, and to file annual updates one year following approval of each preceding WMP. Order No. 36774 at Exhibit A.

### **THE APPLICATION**

The Company submitted its 2026 WMP to the Commission for approval pursuant to the WSCA. Application at 1. The Company represented that its 2026 WMP complied with all requirements of the WSCA—including the notice requirements set forth in *Idaho Code* § 61-1804(2)—and with all Commission directives set forth in Order No. 36774 (“Guidelines”), which was issued in Case No. GNR-E-25-02 on September 30, 2025. *Id.* at 3–4, 6.

According to the Company, its 2026 WMP was the result of a comprehensive assessment of wildfire risk specific to its service territory, which included input from internal experts and industry peers. *Id.* at 4, 7. The Company stated that its proposed wildfire mitigation measures reflected a reasonable balance between mitigation costs and a reduction of wildfire risk. *Id.* at 3–4.

The Company requested a Commission order finding that the 2026 WMP: meets the minimum requirements of the WSCA and the Guidelines; is consistent with public health, safety, and welfare; can be feasibly implemented; reasonably minimizes the risk of wildfires; and provides standard operating procedures for responding to wildfires that do occur. *Id.* at 8. Additionally, the Company sought clarification allowing it to file its future annual WMPs for the Commission’s review on or about November 1 of each year. *Id.*

### **PUBLIC COMMENTS**

On March 13, 2026, IDL, on behalf of Idaho State Forester, Julia Lauch, filed comments identifying several items it believed the Company should include in WMP filings, including: (1) a narrative description of the modeling inputs; (2) a cost-benefit analysis for each general mitigation action category; (3) clarification regarding actions to reduce damage from external wildfire events; (4) a defined formal process for determining the fair market value of timber; (5) worker qualification standards and vegetation inspection practices designed to identify and address conditions specific to wildfire risks; and (6) input from county fire planning groups. IDL Comments at 1–3.

On May 20, 2026, IDL filed supplemental comments with additional recommendations for future WMP filings. IDL believed risk modeling inputs should address Company infrastructure details (type, condition, and age); vegetative layer height; soil type; and damaging wind events. IDL Supplemental Comments at 1–2. Because IDL filed its supplemental comments after both the public comment deadline and the Company’s reply comment deadline, no party has had an opportunity to respond to the recommendations contained in those comments.

### **STAFF COMMENTS**

Following review of the Company’s Application, 2026 WMP, and discovery responses, Staff recommended that the Commission issue an order approving the WMP and clarifying that the Company may file updated annual WMPs on or about November 1 of each year. Staff

Comments at 2. Though Staff believed the 2026 WMP met the relevant requirements, it also suggested improvements for future WMP filings. *Id.*

According to Staff, the Company's WMP should provide additional details about the cost and quality of the Company's wildfire mitigation workforce preparedness. *Id.* at 3–4, 9. Staff recommended that the Commission require the Company to specifically identify internal wildfire mitigation labor in its cost forecasts. *Id.* at 3–4. According to Staff, the Commission has previously ordered other regulated utilities to include a separate line item for internal labor in their WMP cost forecasts. *Id.* at 4 citing Order Nos. 37004 and 36405. Staff also contended that such a requirement would allow tracking of labor costs overtime and assist Staff in its review. *Id.* at 4. Relatedly, Staff recommended that the Commission direct the Company to proactively provide workforce training materials and participation information in future WMP filings. *Id.* at 9.

While noting several strengths of the Company's geographical risk assessment methodology, Staff identified limitations and areas for improvement. *Id.* at 5–7. Staff believed that the Company should use a name other than “wildland urban interface” (“WUI”) to avoid confusion with differing, industry-standard WUI maps. *Id.* at 5. Staff also recommended that the Company consider adjusting inputs used to determine geographical risk areas to align with existing literature and include a detailed description of the risk modeling methodology in its WMP. *Id.* at 5–8.

Though Staff stated that the Company's public and government outreach efforts met the minimum requirements of the WSCA and the Guidelines, it also believed there were opportunities for improvement. *Id.* at 10. Staff suggested that the Company specify the federal, state, local, and tribal organizations with which it coordinates during wildfire mitigation planning. *Id.* Staff also believed that the Company should discuss methods to expand participation in the planning process. *Id.*

Staff further recommended that the Company provide additional details regarding its approach to grid hardening and line rebuilding in future WMPs. *Id.* at 11. Specifically, Staff stated that the Company should consider including information regarding asset-level ignition likelihood and a stochastic scenario optimization in wildfire consequence modeling in the description of its grid hardening approach. *Id.* at 12. As Staff believed some transmission and distribution (“T&D”) projects might be driven by factors unrelated to wildfire mitigation, it also recommended that the Commission instruct the Company to provide a detailed list of all T&D projects driven by wildfire mitigation in future WMP submissions. *Id.* Additionally, Staff believed that the Company could

improve the overhead to underground conversion study by including tables demonstrating potential mitigation effectiveness and a cost-benefit analysis comparing alternative grid hardening strategies. *Id.* at 11–12. Staff also recommended reconsideration of certain premises and modeling inputs used in the undergrounding study. *Id.* at 13–14. Finally, Staff suggested improving the covered conductor pilot study by providing short-term measurable targets and project selection criteria. *Id.* at 14.

Staff also believed that the WMP met the situational awareness and monitoring requirements of the WSCA and the Guidelines. *Id.* at 14–15. However, Staff recommended that the Commission direct the Company to improve the level of detail provided for weather station sources and wildfire detection cameras in future WMP submissions. *Id.* at 15. Staff first thought that the Company should add a description of the publicly available data used in situational awareness efforts. *Id.* Staff believed that the Company should include specific detail surrounding the plans to expand the use of its camera network, including: “locations of focus, average cost of installation, timeframe for installation of cameras, cost-benefit analysis, and other alternatives considered.” *Id.* at 16. Staff further suggested that the Company consider providing metrics for the number of ignitions detected; ignition response time; Company responses; and involvement of Company infrastructure. *Id.*

Similarly, Staff stated that the Company had satisfied WSCA and Guideline requirements regarding discussion of infrastructure inspection and maintenance but again had recommendations for improvement to future WMPs. *Id.* According to Staff, the Commission should instruct the Company to provide details of all inspections. *Id.* at 16–17. Staff also believed that the WMP should include documentation of deficiencies identified through inspection and information regarding corrections. *Id.* at 17.

Despite asserting that the Company had adequately detailed its de-energization protocols, Staff believed future WMPs could benefit from additional description of workforce practices during times of heightened wildfire risk. *Id.* at 17–18. Staff also suggested that the Company continue refining its public safety power shut-off protocols. *Id.* at 18.

Staff recommended that the Company describe its vegetation management quality assurance program in future WMP filings. *Id.* at 19. Staff also agreed with IDL’s recommendation that the Company add “standards specific to wildland fire to training and certification required for personnel doing vegetation management work.” *Id.* at 20. According to Staff, the Commission

should require the Company to continue providing summaries of T&D fault, outage, and ignition data. *Id.* Staff further suggested that the Company consider including such data at the line and feeder level, if possible. *Id.*

Staff noted that during discovery, the Company provided information regarding grants to which it had unsuccessfully (as of January 2026) applied as part of its wildfire mitigation efforts. *Id.* at 21. Staff recommended that the Commission direct the Company to provide details concerning potential alternative funding sources in future WMPs. *Id.*

Staff recommended that the Commission require the Company to include all metrics used within each respective section of future WMPs and to provide the data in a format allowing for easy tracking across WMP filings. *Id.* at 22. According to Staff, these metrics and the associated data allow for tracking and evaluating the Company's plan over time. *Id.*

Finally, Staff supported each of the recommendations that IDL offered in its initial comments. *Id.* at 23.

#### **INTERVENOR COMMENTS**

PotlatchDeltic, the private owner of timbered acreage within and near the Company's Idaho service territory and traversed by the Company's T&D systems, urged the Commission to reject the Company's 2026 WMP or alternatively, to hold a technical hearing prior to making a decision on the Company's Application. PotlatchDeltic Comments at 1–2. The intervenor claimed that “[d]epending on whether [the Company's] WMP is blessed by the Commission, liability for untold millions of dollars of valuable timber and the very lives and livelihoods of PotlatchDeltic's employees and contractors is at stake.” *Id.* at 2. According to PotlatchDeltic, the WSCA requires the Commission to either entirely approve of or reject the Company's WMP. *Id.* at 3. The intervenor argued that the Commission can only properly address any flaw in the WMP by rejecting the Application. *Id.* PotlatchDeltic argued that if the Commission were to approve a flawed WMP, under the WSCA, the Company would receive “a blanket grant of immunity” for its negligence. *Id.*

PotlatchDeltic first contended that the Company's grid hardening efforts, which account for approximately 90 percent of the Company's total wildfire-related expenditures, are either inapplicable to Idaho or merely free rider measures disguised as WMP measures. *Id.* at 4. According to the intervenor, the Company plans to conduct all distribution grid hardening projects scheduled for 2026 and 2027 in Washington State, with no such work planned in Idaho. *Id.* at 5–

6. PotlatchDeltic alleged that this planning was intentional, as the Company’s risk modeling was designed to prioritize denser “urban fringe” areas near Spokane while ignoring risks in high-fuel forested lands in Idaho. *Id.* at 6, 9–13. PotlatchDeltic also contended that all transmission grid hardening efforts planned for Idaho are part of a free rider effort of steel transmission pole replacement that predates the WMP process. *Id.* at 7.

Similarly, the intervenor argued that the Company could not comply with the WSCA’s requirement of developing a vegetation management plan because the vegetation management plan contained in the 2026 WMP was a free rider that was developed prior to the WSCA. *Id.* at 8–9. PotlatchDeltic believed that repurposing pre-WSCA plans could not satisfy the act’s mandates. *Id.* at 9.

PotlatchDeltic further argued that the WMP is too ambiguous to satisfy the requirements of the WSCA. *Id.* at 13. According to PotlatchDeltic, the Company’s grid hardening plans contain unverifiable, unenforceable phrases such as “[r]ebuilding lines with hardened designs,” that the Company failed to sufficiently define through its discovery responses. *Id.* at 14. PotlatchDeltic also noted that despite listing the covered conductor program as one of its top grid hardening strategies, the Company, which allegedly has no plans to install covered conductors in Idaho, provided no standard by which successful implementation of the measure would be demonstrated. *Id.* at 16–17. PotlatchDeltic contended that such ambiguities throughout the plan prevent a clear determination of when the WMP has been reasonably implemented. *Id.* at 16.

Finally, PotlatchDeltic stated that Commission approval of the Company’s flawed plan would shift liability for wildfires started by the Company to Idaho property owners without any obligation for the Company to implement risk mitigation measures in Idaho. *Id.* at 18. PotlatchDeltic characterized potential approval of the WMP as an “unfair, unjust and unreasonable” transfer of wealth “of questionable legality.” *Id.*

### **COMPANY REPLY COMMENTS**

In its reply comments, the Company separately responded to recommendations from Staff, IDL, and PotlatchDeltic.

#### **Response to Staff**

In addition to supporting Staff’s recommendation that the Commission approve its 2026 WMP, the Company expressed agreement with several of Staff’s recommendations to improve future WMP filings. Company Reply Comments at 3. The Company agreed that it should include

a distinct line item for internal labor costs for wildfire mitigation activities. *Id.* The Company also agreed that it should provide the additional workforce preparedness and training documentation and information Staff recommended for inclusion. *Id.* In response to Staff’s recommendation that the Company provide a detailed description of the risk modeling methodology and inputs used to determine geographical risk areas, the Company stated its intention “to include a clearer methodology description in future WMP filings....” *Id.* at 3–4. The Company also committed to adopting Staff’s recommendation of providing summaries of T&D projects for which wildfire mitigation is a documented driver. *Id.* at 4. Additionally, the Company agreed to include more details concerning the weather data sources it uses for situational awareness. *Id.* The Company stated that it had no objection to providing details concerning additional sources of funding. *Id.* at 5. Finally, the Company agreed that future WMPs would include program evaluation metrics in each applicable section in a format that allows for comparisons over time. *Id.*

The Company was non-committal in response to Staff’s recommendation that it provide the details of all inspections in future WMP filings. The Company stated that it would “consider providing supplemental detail, such as a summary table describing inspections in more detail, where doing so adds value and improves transparency in future WMP filings.” *Id.* at 4.

### **Response to IDL**

Generally, the Company indicated that it would incorporate changes to future WMP filings based on the IDL’s recommendations. In response to IDL’s recommendation that future WMPs include narratives describing inputs used for risk modeling, the Company represented that it is currently implementing an updated risk analysis methodology comparable to that used by Idaho’s State Forest Action Plan, which will include additional details regarding the modeling inputs. *Id.* at 6. As to IDL’s recommendation that it perform a cost-benefit analysis for each general mitigation action category, the Company stated that it will continue to assess measures using the risk model while continuing “to evaluate opportunities to enhance its analytical framework and presentation of decision-making information in future WMP filings, consistent with data availability, methodological limitations, and the intent of the WSCA.” *Id.* at 6–7. In response to IDL’s recommendation that the Company clarify actions designed to reduce damage from external wildfire events, the Company stated that the 2026 WMP already identifies strategies to reduce the effects of facilities exposed to wildfire that are applicable to both internal and external ignition risks but also indicated that it would seek to more clearly address how certain mitigation measures

reduce risks from external fires in future plans. *Id.* at 7. As to IDL’s recommendation that it define a formal process for determining the fair market value of timber, the Company responded that it would continue to refine its standard operating procedures regarding the treatment of marketable timber. *Id.* Finally, in response to IDL’s recommendation that it incorporate input from county fire planning groups, the Company expressed its intention to continue participating in county planning groups and to seek additional opportunities. *Id.* at 8.

The Company objected entirely to only one of IDL’s recommendations. The Company stated that it was not currently planning any changes to the certification requirements for its vegetation management workers, despite IDL’s belief that it should establish worker qualification standards and conduct vegetation inspections designed to address specific conditions that increase the risk of wildland fire. *Id.* at 7. According to the Company, its vegetation management practices conform to established industry standards. *Id.*

### **Response to PotlatchDeltic**

The Company disagreed with PotlatchDeltic’s position that the 2026 WMP failed to meet the requirements of the WSCA. *Id.* at 9. In response to PotlatchDeltic’s contention that the Commission must reject any flawed WMP, the Company argued that the Commission possesses broad authority under the statute to condition its approval and oversee implementation of the WMP. *Id.* The Company also opposed PotlatchDeltic’s characterization of WMP approval as “a blanket grant of immunity.” *Id.* Rather, the Company contended that WMP approval would merely create a conditional, rebuttable presumption that the utility acted without negligence with respect to the cause of a damage-causing wildfire. *Id.* Additionally, the Company contended that PotlatchDeltic mischaracterized the requirements of the WSCA when it argued that the Commission should reject the 2026 WMP on the basis that many mitigation efforts pre-dated the WSCA. *Id.* at 10. According to the Company, there is no requirement that each plan element be created following enactment of the statute. *Id.*

As to PotlatchDeltic’s contention that the 2026 WMP is largely inapplicable to Idaho, the Company defended its risk modeling framework as a location-neutral assessment of the Company’s service territory. *Id.* According to the Company, its mitigation measures are informed by the resulting risk scores and mitigation measures are prioritized in the areas where electric-related wildfire risk is the highest. *Id.* The Company stated that the highest scores in this planning period were in Spokane County, justifying concentration of grid hardening and vegetation

management efforts. *Id.* The Company argued that the WSCA does not prevent utilities from prioritizing areas for mitigation investments based on relative risk. *Id.* The Company added that though the 2026 WMP prioritized WUI areas for certain measures, such as distribution hardening, other measures, including pole inspections, vegetation management, operational practices and situational awareness, and protection automation were implemented on a system-wide basis. *Id.* at 13.

The Company also disputed PotlatchDeltic's argument that the 2026 WMP is impermissibly vague. *Id.* According to the Company, the 2026 WMP reasonably established the utility's duties regarding mitigation strategies by providing "annual budgets, targets, inspection programs, and implementation practices...." *Id.* The Company contended that the WSCA does not require each mitigation measure to include rigid thresholds by which successful implementation can be determined. *Id.* at 13–14.

### COMMISSION FINDINGS AND DECISION

The Commission has jurisdiction over the Company's Application and the issues in this case under Title 61 of the Idaho Code including, *Idaho Code* §§ 61-501, -502, and -503. The Commission is empowered to investigate rates, charges, rules, regulations, practices, and contracts of all public utilities and to determine whether they are just, reasonable, preferential, discriminatory, or in violation of any provisions of law, and to fix the same by order. *Idaho Code* §§ 61-501, -502, and -503.

The Commission is required to review a utility's WMP to ensure it satisfies the minimum requirements of the WSCA. *Idaho Code* § 61-1804(1). In conducting its review, the Commission considers the protection of public health, safety, and welfare; the feasibility of the WMP and the cost of its implementation; and the extent to which the WMP minimizes wildfire risk and provides for an effective response to potential wildfire events. *Idaho Code* § 61-1804(1)(a)–(c). The Commission is obligated to incorporate any recommendations submitted by the State Forester in the order approving or rejecting the WMP absent a determination that "they are not just, reasonable, and in the public interest...." *Idaho Code* § 61-1804(3).

Under the Commission's Rules of Procedure, it may find that technical hearing is unnecessary to serve the public interest and may decide a case "through written filings in which persons views are expressed through written comments rather than by hearing." IDAPA 31.01.01.201. Once the Commission notifies interested persons that it may process a case through

this modified procedure, the burden rests on a party requesting a technical hearing to demonstrate “why written comments alone are insufficient.” IDAPA 31.01.01.202.01.c.

### **The Company’s 2026 WMP**

The Commission has reviewed the Company’s 2026 WMP for compliance with the requirements of the WSCA. Based on the record, we find that the Company’s WMP satisfies the minimum statutory requirements set forth in *Idaho Code* § 61-1803(3)(a)–(g). Specifically, the Commission finds that, when reasonably weighing cost mitigation, the 2026 WMP adequately addresses wildfire risk identification and assessment, preventative and corrective mitigation measures, public outreach and governmental coordination, infrastructure inspection and maintenance, operational practices, vegetation management, situational awareness and monitoring, emergency response planning, and public communication protocols. Additionally, we find that the Company’s 2026 WMP is consistent with protection of public health, safety, and welfare; is reasonably implemented; and adequately minimizes wildfire risk.

The approval of a WMP under the WSCA does not predetermine future ratemaking outcomes, cost allocation decisions, or prudence determinations that may arise in future proceedings. Those matters remain subject to review in the appropriate docket. At the same time, the Commission recognizes that the WSCA requires consideration of the feasibility and cost of proposed wildfire mitigation measures as part of the WMP review process. Accordingly, our approval of the WMP reflects compliance with the statutory requirements governing wildfire mitigation planning and should not be interpreted as a determination regarding the recoverability or allocation of any future expenditure.

However, as the Commission values the perspectives of the participants to this proceeding and endeavors to facilitate continual improvements to annual WMP filings through an iterative process, we also direct the Company to make revisions to future WMP submissions addressing some of the concerns expressed in the written submissions—most of which the Company committed to implement in its reply comments. Namely, we instruct the Company to integrate feedback by including: (1) a specific cost forecast for internal wildfire mitigation labor; (2) copies of all wildfire-related training and a table with wildfire mitigation personnel training information; (3) a detailed description of the risk modeling methodology and inputs used to determine geographical risk areas; (4) information for all T&D projects driven by wildfire mitigation efforts; (5) a description of the publicly available data the Company uses as part of its situational awareness

efforts; (6) a description of all wildfire mitigation inspections that the Company performs; (7) continued summaries of the Company's T&D fault, outage, and ignition data; (8) details concerning potential alternative wildfire mitigation funding sources; (9) all metrics used for the WMP within each respective section in a format allowing for easy tracking across WMP filings; (10) a cost-benefit analysis for each general mitigation action category; (11) a description of actions designed to reduce damage from external wildfire events; (12) establish a formal process for determining the fair market value of timber; and (13) input from county fire planning groups.

We note that the Company had no opportunity to respond to the recommendations contained in IDL's supplemental comments, filed on May 20, 2026. Accordingly, we will not expressly require the Company to incorporate those recommendations in future WMPs. Nevertheless, in recognition of the statutory deference afforded the State Forester, we expect the Company to implement the recommendations concerning risk modeling inputs unless it can articulate substantial justification for failing to do so. The recommendations include accounting for Company infrastructure details (type, condition, and age); vegetative layer height; soil type; and damaging wind events.

While the Commission is unopposed to IDL's position that vegetation inspection practices and certification standards should address conditions specific to wildfire risks, without further elaboration of the additional requirements envisioned by IDL, we lack the basis to impose rigid obligations on the Company in excess of, and possibly contrary to, what IDL acknowledges are established industry standards. However, we strongly encourage the Company to explore opportunities to address IDL's concerns about vegetation inspections overlooking fire ignition and propagation potential.

Though the Commission understands PotlatchDeltic's discomfort with a plan that largely focuses on mitigation efforts outside of Idaho, we do not find that rejecting the Company's 2026 WMP on that basis would serve the intent of the WSCA or the public interest. The WSCA unambiguously tasks utilities with conducting "a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk." *Idaho Code* § 61-1803(1). To that end, the Company subjected its entire service territory to a risk model assessment for purposes of prioritizing areas for mitigation activities. PotlatchDeltic suggested that the Company's risk modeling was intentionally designed to prioritize Washington territory by giving more weight urban fringe areas, but it made no showing that the model's sensitivity to higher density resulted in an inaccurate ranking of areas

in terms of wildfire risk faced by the Company. We decline to dictate the risk modeling input values employed for the Company's WMPs at this time. However, we can revisit the deference given to the Company later should the Commission sense a pattern of the Company's WMPs disproportionately prioritizing out-of-state areas.

We disagree with PotlatchDeltic's argument that mitigation measures pre-dating the WSCA should be disregarded when assessing satisfaction of the statutory requirements. The fact that certain measures were implemented as standard practice prior to the effective date of the WSCA does not invalidate the effectiveness of those measures, either in fact or according to the statutory text.

Finally, the Commission emphasizes that all directives from prior Order Nos. 35909 and 36741 that are not superseded or otherwise addressed by the WSCA or Order No. 36774 remain in full force and effect. The Company is expected to continue complying with those requirements unless the Commission orders otherwise.

#### **PotlatchDeltic's Request for a Technical Hearing**

The Commission finds that a technical hearing is unnecessary to render a decision in this matter. PotlatchDeltic has had sufficient opportunity to examine the Company's positions related to this case through discovery. PotlatchDeltic made no showing, and in fact, did not expressly contend that written comments alone were insufficient to develop a full evidentiary record in this proceeding. Setting a technical hearing would not contribute meaningfully to a resolution of the case.

#### **ORDER**

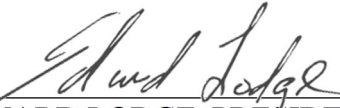
IT IS HEREBY ORDERED that the Company's 2026 WMP is approved.

IT IS FURTHER ORDERED that the Company shall revise future WMPs in a manner consistent with the directives of this Order.

IT IS FURTHER ORDERED that the Company may file its updated annual WMP on or about November 1 of each year.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within 21 days of the service date of this Order regarding any matter decided in this Order. Within seven days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *Idaho Code* § 61-626.

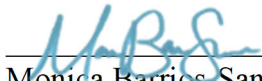
DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 9<sup>th</sup> day of June 2026.

  
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EDWARD LODGE, PRESIDENT

  
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JOHN R. HAMMOND JR., COMMISSIONER

  
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DAYN HARDIE, COMMISSIONER

ATTEST:

  
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Monica Barrios-Sanchez  
Commission Secretary

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