

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF RAFT RIVER RURAL) CASE NO. C11-E-26-01
ELECTRIC CO-OP INC.'S APPLICATION)
FOR APPROVAL OF THE COMPANY'S) ORDER NO. 37112
WILDFIRE MITIGATION PLAN)
_____)

On January 29, 2026, Raft River Rural Electric Co-op Inc. ("Company") applied to the Idaho Public Utilities Commission ("Commission") requesting approval of its Wildfire Mitigation Plan ("2026 WMP") in accordance with the Wildfire Standard of Care Act ("WSCA") *Idaho Code* § 61-1801, *et seq.* and the guidelines established in Commission Case No. GNR-E-25-02 ("Application"). Application at 1.

On March 3, 2026, the Commission issued a Notice of Application and Notice of Intervention Deadline, setting a deadline for interested parties to file a petition to intervene. Order No. 36952. No petitions to intervene were filed. On April 2, 2026, the Commission issued a Notice of Modified Procedure, establishing public comment and Company reply deadlines. Order No. 36988. Only Commission Staff ("Staff") and the Idaho Department of Lands ("IDL") filed comments. IDL filed its initial comments and an amendment to its comments after the public comment deadline.

Based on our review of the record, we issue this Final Order denying the Application for approval of the 2026 WMP.

BACKGROUND

On July 1, 2025, the WSCA 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 utilities system planning and operations, particularly for electric corporations 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 electric corporations 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.*

The WSCA allows municipal and cooperative electric corporations to voluntarily submit WMPs for review by the Commission. *Idaho Code* § 61-1803(2)(b). The WSCA does not treat a municipal or cooperative electric corporation's WMP differently than a Commission-regulated public utility's WMP. Order No. 36774 at 14. If a municipal or cooperative electric corporation elects to file a WMP, 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." *Idaho Code* § 61-1803(2)(b).

The WSCA requires the Commission to consult with the IDL state forester ("State Forester") on an electric corporation's WMP. *Idaho Code* § 61-1804(3). Recommendations from the State Forester for a WMP are presumed to be reasonable and appropriate under the WSCA. *Id.* The presumption of reasonableness regarding the State Forester's recommendations on a WMP can only be overcome by a showing that said recommendations are "not just, reasonable, and in the public interest." *Id.* Recommendations on a WMP from the State Forester that the Commission does not deem unreasonable, unjust, or not in public interest must be incorporated in the Commission's decision on a WMP. *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 electric corporation will undertake to prepare for and respond to wildfire-related threats and helps define the electric corporation'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). If an electric corporation, like a municipal or cooperative utility, elects to file any future WMP filings, to ensure continued adaptation to changing conditions, the statute requires electric corporations 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 that established a filing schedule, guidelines, and essential components for WMPs filed for

Commission review and approval. Order No. 36774 at Exhibit A. Each WMP filed with the Commission, whether it is a Commission-regulated utility's WMP or a municipal or cooperative electric corporation's WMP, is subject to the requirements for WMPs under the Commission WMP guidelines detailed in Order No. 36774 ("Guidelines") and Order No. 36929.

In conducting its review, the Commission considers: (1) the protection of public health, safety, and welfare; (2) the feasibility of the WMP and the cost of its implementation; and (3) 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 also considers its Guidelines, which require a WMP to include the following sections: (1) geographical risk assessment; (2) preventative actions and programs; (3) public outreach and engagement; (4) government outreach; (5) method of line design; (6) situational awareness and monitoring; (7) infrastructure inspection and maintenance; (8) de-energization and line operation practices; and (9) vegetation management.

THE APPLICATION

The Company submitted its WMP in accordance with the WSCA and the Guidelines. Application at 1. The Company represented the WMP is intended to reduce wildfire risk by guiding strategies for wildfire mitigation. *Id.* The Company stated that the WMP identifies areas at heightened risk of wildfires due to the Company's electric utility infrastructure or equipment. *Id.* The Company stated that the WMP employed a cost-benefit balancing approach to selecting and prioritizing mitigation strategies, including inspection programs, system hardening, vegetation management, and stakeholder outreach, among other measures. *Id.*

STAFF COMMENTS

Staff reviewed the 2026 WMP for compliance with the requirements of the WSCA, the Guidelines, and Order No. 36929. Staff Comments at 2. Based on its review, Staff believed the 2026 WMP, and additional information provided by the Company through discovery, satisfied the applicable statutory and regulatory requirements, and Staff recommended that the Commission approve the 2026 WMP and direct the Company to meet with IDL and the Company's third-party vendor, Steven W. Carothers & Associates ("SWCA") Environmental Consultants, to correct the Company's wildfire risk assessment prior to filing its next WMP. *Id.* at 17. Further, Staff recommended the Commission direct the Company to include the following additional information in future filings, should the Company seek Commission approval of another WMP:

1. Provide detailed, wildfire-related project-level cost forecasts for each year;
2. Provide details of all funding alternatives and funding sources pursued;
3. Include wildfire risk mitigation benefits, whether qualitative or quantitative, as part of its cost-benefit analysis;
4. Include all metrics used within each respective section and provide the data in a format that can easily be tracked across WMP filings, with at a minimum of three years of data if available;
5. Provide an explanation of how certain mitigation activities, such as grid hardening efforts, are reducing wildfire risk;
6. Include an explanation of how the Company identifies, evaluates, and selects wildfire-related projects;
7. Include the wildfire-related project-level details that include targets, expected wildfire mitigation benefits, and alternatives considered within the respective sections of the WMP;
8. Include a description of each external weather source and include additional information of the situational awareness meetings; and
9. Include additional details about the Company's weather station network, including areas of focus, average cost, and any metrics it will use to evaluate success of the network.

Id. at 17–18. If the 2026 WMP is approved, Staff recommended the Commission clarify that the Company can file an updated WMP annually on or about January 29 of each year for Commission review and approval. *Id.* at 17.

I. Cross Cutting Elements

a. Cost Feasibility

i. Cost Forecasts

Staff believed the 2026 WMP and information provided by the Company through discovery with Staff satisfied the Guidelines' requirement that an electric corporation provide a cost forecast for program categories and capital and O&M expenditures in its WMP. *Id.* at 4.

ii. Identifying Wildfire Expenditures

Staff noted that the cost forecasts supplied in the 2026 WMP, and in most of the Company's responses in discovery, did not include specific wildfire-related expenses. *Id.* However, Staff stated that in discovery the Company supplied a breakdown of the estimated costs for its system improvement schedule. *Id.* at 4–5. Because the Company was able to provide information on the estimated costs for its system improvement schedule, Staff believed the Company was able to narrow down which of its projects were associated with wildfire mitigation and thus show some of the costs associated with implementing the 2026 WMP, which the Commission must consider

under the WSCA (*Idaho Code* § 61-1804(1)(b)). *Id.* Staff recommended the Commission direct the Company to include detailed project-level costs forecasts for projects that are wildfire-related in any future WMP filings. *Id.*

iii. Grants

Staff noted the 2026 WMP did not include information on funding alternatives, such as grant funds, in its information on the cost of implementing the 2026 WMP. *Id.* at 5. In response to Staff's discovery requests, the Company supplied information on three grants the Company had received. *Id.* Staff believed information on funding alternatives helps inform the Commission on an electric corporation's cost of implementing its WMP, which the Commission is required to consider under the WSCA (*Idaho Code* § 61-1804(1)(b)). *Id.* Thus, Staff recommended the Commission direct the Company to include alternative funding sources the Company is pursuing, if any, and the amount of funds received, to help fund its wildfire mitigation efforts in any future WMP filings. *Id.*

iv. Cost-Benefit Approach

Staff explained that because the Company provided “qualitative wildfire risk mitigation benefits” in discovery, Staff believed that the Company satisfied the requirements under the Guidelines to provide information that would allow the Commission to consider the feasibility of a WMP. *Id.* at 5. Staff recommended the Commission direct the Company to include information on the benefits of wildfire risk mitigation, either qualitative or quantitative, and to define the benefits and explain their effectiveness of mitigating wildfire risk, in all future WMP filings. *Id.* at 5–6. Staff believed using a “consistent, transparent, and repeatable methodology across all projects” would help the Commission determine if the Company's projects were being prioritized using similar data. *Id.*

b. *Cross Cutting Elements*

i. Metrics within the WMP

Staff stated the 2026 WMP did not include information on the metrics the Company uses to measure and track the effectiveness of its wildfire mitigation plans, operations, and projects. *Id.* at 6–7. Through discovery, Staff was able to analyze how the Company measured and tracked the effectiveness of its wildfire mitigation plans and work, and thus Staff believed the Company provided sufficient information on material the Commission must consider under the WSCA (*Idaho Code* § 61-1804(1)(b)-(c)). *Id.* at 7. However, Staff believed information on metrics used

to track the effectiveness of wildfire mitigation efforts must be included in an electric corporation's WMP, and not through discovery. *Id.* Thus, Staff recommended the Commission direct the Company to include information on the metrics it uses to track the feasibility of wildfire mitigation efforts in any future WMP filings. *Id.*

ii. Coordination with IDL

In a meeting between Staff and IDL, IDL shared concerns it had with the accuracy of the data used in the 2026 WMP. *Id.* IDL indicated to Staff that it intended to file its concerns as public comments. *Id.* Staff recommended the Commission consider IDL's comments in conjunction with Staff's comments.

iii. Lessons Learned from Previous WMPs

Staff believed that the Guidelines' requirement that electric corporations supply information on the lessons it has learned from its previously approved WMPs was not applicable to the Company because the Company was not a utility regulated by the Commission and had not previously filed a WMP for approval with the Commission. *Id.* at 8.

II. Geographical Risk Assessments

a. *Risk Model Limitations*

Staff noted that the Company's third-party vendor, SWCA Environmental Consultants, utilized various fire behavior models that Staff stated were well-established to model the areas in the Company's service territory that are at wildfire risk. *Id.* at 9. Staff believed that the SWCA Environmental Consultants' model for the Company was sufficient to satisfy what was required under the WSCA (*Idaho Code* § 61-1803(3)(a)) and the Guidelines, which requires a WMP to include an explanation of the Company's assessment and identification of wildfire risk areas. *Id.*

However, Staff noted it was concerned with SWCA Environmental Consultants' modeling approach because in a meeting with IDL, IDL raised concerns regarding whether the data set for the Wildland Urban Interface ("WUI") was included in the modeling for the Company's wildfire risk areas. *Id.* IDL indicated to Staff that if the WUI data was not included, then the Company's wildfire risk model may not be accurate. *Id.* Thus, while Staff believed the Company supplied what was required under the WSCA (*Idaho Code* § 61-1803(3)(a)) and the Guidelines on assessing and identifying wildfire risk areas, based on IDL's concerns with the sufficiency of SWCA Environmental Consultants' modeling approach, Staff recommended that the Commission direct

the Company to work with IDL and SWCA Environmental Consultants' on IDL's concerns with the modeling approach before filing a future WMP with the Commission. *Id.* at 9.

Staff stated that while it believed the Company's model developed by SWCA Environmental Consultants did consider risk due to external factors, it believed the model did not factor in the risk of ignition from the Company's infrastructure, which Staff believed would help the Company make decisions on where to invest in its system. *Id.* at 9–10. Thus, Staff encouraged the Company and SWCA Environmental Consultants to include risk from infrastructure as they further refine the modeling approach for the Company's wildfire risk areas. *Id.* at 10. Further, because the WSCA requires consideration of a WMP's adequacy of minimizing wildfire risk, and the Company was able to supply information on the qualitative benefits of its wildfire mitigation benefits through discovery, Staff recommended the Commission direct the Company to include narratives on how the Company's mitigation efforts have reduced wildfire risk in any future WMP filings. *Id.*

III. Method of Line Design and System Hardening

While the Company provided information on its process for system hardening in the 2026 WMP, Staff believed the 2026 WMP did not sufficiently explain how the Company chooses its system hardening projects (e.g., criteria, costs, etc.). *Id.* at 12. Staff stated that because the Company explained how the Company chooses its system hardening projects in response to Staff's discovery requests, Staff believed that the Company satisfied the requirements of the WSCA (*Idaho Code* §§ 61-1803(3)(b) and 61-1803(3)(e)) and the Guidelines. *Id.*

However, Staff believed information on how the Company selects its system hardening projects must be included in an electric corporation's WMP under the WSCA and the Guidelines, and not through discovery. *Id.* Thus, Staff recommended the Commission direct the Company to include said information in any future WMP filings. *Id.*

IV. Situational Awareness and Monitoring

Staff explained that because the 2026 WMP included high level information on the Company's current method for monitoring weather, and because the Company supplied additional information on weather monitoring through discovery, Staff believed the Company satisfied the WSCA (*Idaho Code* § 61-1803(3)(f)) and the Guidelines that require a WMP to detail how a utility assesses wildfire risk and weather conditions. *Id.* at 12–13. Even though Staff considered the information on the Company's weather and situation monitoring in the 2026 WMP and discovery

sufficient, Staff believed information on weather and situation monitoring must be included in an electric corporation's WMP under the WSCA and the Guidelines, and not through discovery. *Id.* at 13. Thus, Staff recommended the Commission direct the Company to include the information it provided in discovery on weather and situation monitoring in any future WMP filings. *Id.*

V. Vegetation Management

a. Marketable Timber on Timber Company Land

Staff noted that the Company explained in discovery that the Company has no timber land in its service territory or near its Rights of Ways. *Id.* at 17. Thus, Staff believed *Idaho Code* § 61-1803(3)(g)(iii) was not applicable to the Company and its operations. *Id.*

VI. Suggestions from Staff

Staff outlined various suggestions for the Company on information and/or practices Staff believed the Company should consider implementing and including in any future WMP filings, should the Company file again with the Commission. For instance, Staff encouraged the Company to include additional information on the Company's objectives and goals for the "risk assessment system hardening, situational awareness, outreach and communications, inspection, and vegetation management categories" of the 2026 WMP in any future WMP filings. *Id.* at 6. Staff also suggested the Company include a figure that shows an overview of wildfire risk in the Company's total service territory, rather than in separate maps. *Id.* at 10. Additionally, Staff encouraged the Company to include its wildfire mitigation training in any future WMP filings. *Id.* at 11. Further, Staff recommended the Company continue to refine and update its outreach, engagement, and education efforts with the public and its government outreach work. *Id.* at 11–12.

Regarding infrastructure inspection and maintenance, Staff recommended the Company include details on its line inspection frequency. *Id.* at 14. Further, Staff suggested the Company supply information on its quality assurance ("QA") review of infrastructure maintenance. *Id.* Regarding monitoring deficiency backlog for infrastructure, Staff encouraged the Company to include the information it supplied in discovery that identified deficiency priority categories, the amount of deficiency repairs completed, repair objectives, time to repair, and remaining repairs, in any future WMP filings. *Id.*

Regarding the Company's operations during heightened wildfire risk or in high-risk areas, Staff encouraged the Company to include details on what operational changes the Company makes during those times and/or in those areas in future WMP filings. *Id.* at 15. Additionally, Staff

encouraged the Company to include information on its QA process for managing vegetation. *Id.* at 16. Regarding vegetation inspection, Staff recommended the Company provide more details and context for why it changed its schedule and frequency of vegetation management inspections in any future WMP filings. *Id.* Lastly, regarding vegetation management training, Staff suggested the Company consider whether the International Society of Arboriculture’s Wildfire Risk Reduction Qualification would be useful for the Company to address shortfalls of the American National Standards Institute A300 standards that IDL identified in a meeting with Staff and the Company. *Id.*

PUBLIC COMMENTS

I. IDL Comments

a. Initial Comments

IDL was concerned with the Company’s risk modeling because IDL believed there was insufficient information on the data and methodology used to develop the modeling. IDL Comments at 1. IDL requested the Company provide more descriptive details on the risk modeling data and methodology. *Id.* For the Company’s future assessments of wildfire risk, IDL strongly recommended the Company include data on: (1) the Company’s system components; (2) where trees surrounding the Company’s system are taller than said system; and (3) information on soil types. *Id.* at 1–2.

IDL recommended the Company include information on the risks associated with, and mitigation efforts for, “significant straight line wind events” that IDL believed occur frequently in the Company’s service territory. *Id.* at 2. IDL believed there was an opportunity for “cross integration” between county level Community Wildfire Protection Plans (“CWPP”) and a utilities wildfire mitigation plan and thus encouraged the Company to work with Idaho counties where the Company’s system is located to improve wildfire response and mitigation efforts. *Id.* at 2–3. Regarding the Company’s vegetation management, IDL recommended the Company’s inspection qualification standards include wildland fire certification. *Id.* at 3.

Regarding the areas of the Company’s system that show elevated risk of wildfire in the Company’s risk modeling, IDL requested narrative details from the Company on how it prioritizes or adjusts the frequency of system inspections in conjunction with elevated risk areas of wildfire. *Id.* IDL also believed the 2026 WMP did not sufficiently explain how the Company receives and uses situational awareness data and thus made it difficult for IDL to evaluate the Company’s

situational awareness regarding wildfire. *Id.* IDL noted there were multiple sections in the 2026 WMP that needed to be updated to reflect current information. *Id.* at 3–4.

b. Amended Comments

On June 9, 2026, IDL filed amended comments. IDL Amended Comments at 1–2. Specifically, IDL stated that the Company’s wildfire risk modeling did not include “clearly identifiable wildland interface (WUI) or other comparable data in the modeling....” *Id.* at 2. IDL explained that the consequence of not including that information was that a fire ignited by a utility was not accurately reflected in the modeling and caused IDL to question the validity of the risk modeling. *Id.* Due to the questionable validity of the risk modeling, IDL recommended the 2026 WMP be denied. *Id.*

IDL also reiterated its requests for the Company to include certain data inputs, more information on how the Company tackles straight line wind events, additional information on the Company’s process for prioritizing inspections, more details on how situational awareness data is used, and to update certain sections of the 2026 WMP. *Id.* at 1–4. Additionally, IDL repeated its suggestion that the Company work with Idaho counties on wildfire mitigation and consider wildland fire certification in its inspection practice. *Id.*

COMMISSION FINDINGS AND DECISION

An electric corporation like the Company can elect to file a WMP with the Commission for review and approval. *Idaho Code* § 61-1803(2)(b). Once an electric corporation files a WMP with the Commission for review, the WMP is subject to the authority and jurisdiction of the Commission. *Id.* When reviewing a WMP, the Commission must ensure the WMP satisfies the minimum requirements of the WSCA (*Idaho Code* § 61-1804(1)) and the requirements set forth in the Commission’s Guidelines.

The Commission recognizes that the 2026 WMP is the Company’s first WMP submitted to the Commission for review and approval under the WSCA. The Commission also recognizes that wildfire mitigation planning is an evolving process. As utilities gain operational experience, incorporate new technologies, collect additional data, and evaluate the effectiveness of mitigation activities, future WMPs will continue to develop and improve. Thus, we understand that subsequent WMPs will look different from a utility’s first WMP.

However, through WSCA, the Idaho Legislature established minimum requirements that must be satisfied before the Commission may approve a WMP. *See Idaho Code* § 61-1801, *et seq.*

Those requirements ensure that an approved WMP provides a sufficient account of the utility's wildfire risks, mitigation efforts, operational practices, and plans for reducing wildfire risk. Because approval of a WMP under the WSCA imposes a rebuttable presumption that the Company acted without negligence if it reasonably implemented its Commission-approved WMP, the Commission must ensure a WMP adequately and comprehensively describes the Company's operational and preventive measures for wildfire mitigation before granting approval.

The Commission has reviewed the record in this case. Based on our review, we find that the 2026 WMP does not adequately provide information on the Company's wildfire risk assessment that the Commission must consider under the WSCA, specifically *Idaho Code* § 61-1803(3)(a), and the Guidelines. The Commission acknowledges and appreciates the Company's cooperation throughout Staff's review of the 2026 WMP in its responses to discovery requests and providing additional information for the 2026 WMP where Staff sought clarity or supporting documentation. While the additional information provided by the Company was helpful and demonstrates the Company's willingness to engage in the Commission's review process, we find that the information provided did not fully resolve the material omissions or limitations with the 2026 WMP. Thus, additional development of the 2026 WMP is necessary before the 2026 WMP can be approved.

I. Wildfire Risk Assessment and Modeling

The Commission finds that the Company's wildfire risk model requires further development before approval can be granted. While the Commission recognizes that the WSCA does not require a specific wildfire risk model or prescribe a particular analytical framework, we find that the risk assessment used in a WMP must include identifiable WUI, infrastructure, and other comparable data.

The Commission acknowledges that IDL's original and amended comments were filed after the public comment deadline. However, due to IDL's role in this process as set forth by the WSCA, the Commission has considered IDL's late filed comments in this case.

IDL noted concerns with SWCA Environmental Consultants' modeling approach. IDL Comments at 1. Specifically, IDL was concerned that the Company's wildfire risk model did not include WUI. IDL Amended Comments at 2. IDL explained that not including WUI or other similar data caused the Company's wildfire risk model to not accurately reflect the consequences of a wildfire ignited by a utility. *Id.* As a result of the omission, IDL questioned the validity of the

risk model and recommended denial of the 2026 WMP until the issues it identified were addressed. *Id.*

Similarly, Staff believed that while the risk model supplied what was required under the WSCA (*Idaho Code* § 61-1803(3)(a)) and the Guidelines on the Company's assessment and identification of wildfire risk areas, based on IDL's concerns and the fact that the model did not consider risk due to external factors (i.e., infrastructure), Staff recommended that the Commission direct the Company to work with IDL and SWCA Environmental Consultants on the modeling approach (including data inputs) utilized for the wildfire risk model. Staff Comments at 9–10.

The Commission finds IDL's concerns, and Staff's recommendations, reasonable and finds that IDL and Staff's concerns should be addressed before the Commission grants approval of the 2026 WMP. Accordingly, the Commission strongly encourages the Company to work with IDL on its wildfire risk modeling approach and to include in future WMP filings wildfire risk modeling that incorporates WUI, infrastructure, and similar data to accurately model and reflect the consequences of a wildfire ignited by a utility.

II. Incorporating Additional Information in the 2026 WMP

We find that supplemental information that was provided by the Company in discovery regarding: (1) wildfire-related project-level forecasts; (2) funding alternatives and sources; (3) wildfire risk mitigation benefits; (4) metrics used in components of the 2026 WMP; (5) wildfire-related project-level details; (6) mitigation activities; and (7) information on the Company's weather station network and monitoring (collectively "Supplemental Information") was consistent with what is required under the WSCA and the Guidelines. However, the Supplemental Information was not in the 2026 WMP. The Commission finds that the Supplemental Information must be included in future WMP filings. Our finding is based on the fact that the WSCA imposes a rebuttable presumption that the Company acted without negligence if it reasonably implemented its Commission-approved WMP. Thus, the Commission must ensure a WMP comprehensively describes the Company's operational and mitigation measures for wildfire mitigation.

Accordingly, the Commission finds that the Company must include the following information (collectively "WMP Update Material") in any future WMP filings:

1. Provide detailed, wildfire-related project-level cost forecasts for each year, consistent with, but further developed from, the information that was supplied in the Company's Response to Staff's First Production Request at No. 17;

2. Provide details of all funding alternatives and funding sources pursued, consistent with, but further developed from, the information that was supplied in the Company's Response to Staff's First Production Request at No. 17;
3. Include wildfire risk mitigation benefits, whether qualitative or quantitative, as part of its cost-benefit analysis, consistent with, but further developed from, the Company's Supplemental Response to Staff's First Production Request at No. 20;
4. Include all metrics used within each respective section and provide the data in a format that can easily be tracked across WMP filings, with at a minimum of three years of data if available, consistent with, but further developed from, the Company's Response to Staff's First Production Request at No. 23 and the Company's Response to Staff's First Production Request at No. 24;
5. Provide an explanation of how certain mitigation activities, such as grid hardening efforts, are reducing wildfire risk, consistent with, but further developed from, the information that was supplied in the Company's Response to Staff's First Production Request at No. 1 and the Company's Response to Staff's First Production Request at No. 17;
6. Include an explanation of how the Company identifies, evaluates, and selects wildfire-related projects, consistent with, but further developed from, the Company's Response to Staff's First Production Request at No. 17 and the Company's Response to Staff's Second Production Request at No. 25;
7. Include the wildfire-related project-level details that include targets, expected wildfire mitigation benefits, and alternatives considered within the respective sections of the WMP, consistent with, but further developed from, the Company's Response to Staff's First Production Request at No. 17 and the Company's Response to Staff's Second Production Request at No. 25;
8. Include a description of each external weather source and additional information of the Company's situational awareness, consistent with, but further developed from, the information the Company supplied in meetings with Staff; and
9. Include additional details about the Company's weather station network, including areas of focus, average cost, and any metrics it will use to evaluate success of the network, consistent with, but further developed from, the information the Company supplied in meetings with Staff.

Additionally, the Commission finds that most of IDL's recommendations in this case are reasonable and thus the Company must incorporate the following recommendations from IDL (collectively the "IDL Recommendations") in any future WMP filing:

1. Include more descriptive details on the Company's risk modeling data and methodology;
2. Include the following data inputs in future evaluations of wildfire risk:
 - a. Type, condition, and age of system components;
 - b. Data regarding the vegetative layer that includes information where the surrounding tree canopy is taller than the adjacent system; and

- c. Soil layer data.
- 3. Include information on the risks associated with, and mitigation efforts for, significant straight-line wind events;
- 4. Work with counties where the Company's system is located to improve wildfire response and mitigation efforts;
- 5. Provide narrative details on how the Company prioritizes or adjusts the frequency of system inspections in conjunction with elevated risk areas of wildfire;
- 6. Further describe how the Company receives and uses situational awareness data; and
- 7. Update the material supplied in the following sections of the 2026 WMP to reflect current information:
 - a. Sections 2.1.1 to reflect policy directing elements of the mitigation plan;
 - b. Section 2.5.2.1.1 to include the Owyhee County Plan Hazard Mitigation Plan that was updated and approved in 2018;
 - c. Section 2.5.4.1 to include the Idaho Forest Action Plan that was updated in 2020;
 - d. Section 2.5.5.1 to reflect that the Bureau of Land Management now includes the national Wildland Fire Service; and
 - e. Section 3.1.1.1 to reflect an accurate trend based on data maintained by IDL.

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. Thus, without additional information from IDL, we find that its recommendation that the Company include wildland fire specific inspection standards in its vegetation inspection as unreasonable. However, we strongly encourage the Company to explore opportunities to address IDL's concerns about vegetation inspections overlooking fire ignition and propagation potential. In any future WMP filing, the Company must describe what effort it has taken to address this recommendation, or if no attempt has been made to address the recommendation, the Company must explain why it was unaddressed.

III. Conclusion

The Commission recognizes the significant work undertaken by the Company in preparing the 2026 WMP for Commission review and approval and appreciates the Company's cooperation throughout the process. The Commission also recognizes that wildfire mitigation planning will continue to evolve as utilities gain experience and additional information becomes available. At

the same time, the Commission has a responsibility to the people of Idaho to ensure that any WMP approved under the WSCA satisfies the minimum requirements established by the Legislature. The Commission must balance this responsibility with its obligation to provide utilities with a fair and reasonable regulatory process and to recognize the practical challenges associated with wildfire mitigation planning.

Based on our review of the record, the Commission finds that the Company's 2026 WMP provides a foundation for its wildfire mitigation efforts but does not contain sufficient wildfire risk modeling that is needed for the Commission to make the findings necessary for approval under the WSCA. Accordingly, the Commission denies the Application for approval of the 2026 WMP without prejudice. The Commission encourages the Company to continue working with Staff and IDL as it develops its next WMP. The Commission expects that future filings will address the concerns and recommendations identified and outlined in this Order. A future WMP that incorporates these improvements and provides sufficient risk modeling will allow the Commission to conduct the thorough review required by the WSCA and determine whether approval is appropriate.

ORDER

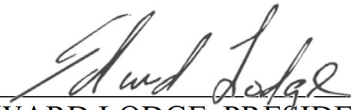
IT IS HEREBY ORDERED that the Application for approval of the 2026 WMP is denied.

IT IS FURTHER ORDERED that in any future WMP filing the Company shall incorporate the WMP Update Materials outlined in this Order, provided that such material may be reasonably adjusted to account for change in facts, circumstances, available data, applicable assumptions, and other relevant factors with sufficient justification.

IT IS FURTHER ORDERED that the Company shall incorporate in future WMP filings the IDL Recommendations outlined in this Order.

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 29th day of July 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary
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