

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF CLEARWATER	)	CASE NO. CO1-E-26-01
POWER COMPANY’S APPLICATION FOR	)	
APPROVAL OF THE COMPANY’S 2026	)	
IDAHO WILDFIRE MITIGATION PLAN	)	ORDER NO. 37102
	)	
	)	

On January 20, 2026, Clearwater Power Company (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting that the Commission issue an order approving its 2026 Idaho Wildfire Mitigation Plan (“WMP”), in accordance with *Idaho Code* § 61-1801, *et seq.*, the Wildfire Standard of Care Act (“WSCA”), and the guidelines established by the Commission in Case No. GNR-E-25-02 (“Guidelines”)(“Application”).

On February 13, 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. 36934. Intervention was granted to PotlatchDeltic Forest Holdings, LLC (“PotlatchDeltic”). Order No. 36938.

On March 23, 2026, the Commission issued a Notice of Modified Procedure, establishing deadlines for public comments and Company reply comments. Order No. 36977. Staff and PotlatchDeltic filed comments. Public comments were filed by the Idaho Department of Lands (“IDL”). The Company filed reply comments.

Based on our review of the record, the Commission now issues this Final Order denying the Company’s 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 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 utility'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 the public interest must be incorporated in the Commission's decision on a WMP. *Id.*

Commission-approved WMPs shall be implemented upon approval and 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 Nos. 36774 and 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; (9) vegetation management.

THE APPLICATION

The Company's WMP outlined a set of strategies, programs, and activities, supported by goals and performance measures, designed to reduce fire-related risk in the near term while allowing for ongoing improvement. WMP at 1. The Company stated that as it implements the 2026 WMP and gains operational experience, and as new data or technologies become available, the Company's mitigation practices will be regularly reviewed, evaluated, and enhanced. *Id.* The Company believed that its WMP addressed key areas such as vegetation management, asset inspection, system maintenance, recloser setting protocols, communications, and service restoration. *Id.* Additionally, the Company's WMP established roles and responsibilities, identified performance metrics and mitigation gaps, and included processes for auditing and approving the plan. *Id.* The Company's WMP also outlined initiatives aimed at reducing the risk of wildfires caused by electrical equipment and considered the specific characteristics of the Company's service territory, including terrain, climate conditions, infrastructure, grid design, and wildfire exposure. *Id.*

STAFF COMMENTS

Commission Staff (“Staff”) reviewed the Company’s 2026 WMP pursuant to *Idaho Code* § 61-1804 and believed that the filing substantially complied with the requirements of the WSCA, Commission Order No. 36774, and the Commission’s Guidelines. Staff Comments at 2. Staff evaluated whether the WMP was consistent with public health, safety, and welfare; whether the proposed mitigation measures were feasible and cost-effective; and whether the plan adequately minimized wildfire risk and addressed wildfire response. *Id.* Staff believed that the Company satisfied the required filing components, including the geographic risk assessment, prevention and mitigation programs, public and governmental outreach, line design practices, situational awareness and monitoring, inspection and maintenance programs, operational practices, and vegetation management strategies. *Id.* Staff also believed that the Company complied with additional filing requirements, including submission of a Need to Know document, stakeholder notification, and a three-year planning horizon addressing prior Commission directives, and Staff recommendations. *Id.*

While recommending approval of the 2026 WMP, Staff identified several areas for improvement in future filings. *Id.* at 4. Staff believed that the Company’s cost forecasts and implementation plans were generally reasonable and feasible but recommended that future WMPs provide more robust cost-benefit analyses, including consistent method for measuring wildfire risk reduction and documenting project benefits. *Id.* at 4-5. Staff also recommended that the Company disclose all grant funding opportunities pursued or received, as external funding affects the evaluation of project costs and feasibility. *Id.* at 6. Additionally, Staff encouraged the Company to enhance future filings by including more comprehensive performance metrics, measurable targets, historical trend data, lessons learned from prior mitigation activities, and project-level details such as costs, timelines, alternatives considered, and expected benefits. *Id.*

Staff also evaluated the Company’s wildfire risk assessment and modeling method. *Id.* at 9-10. Although Staff believed that the Company employed a reasonable approach to identify wildfire risk areas, concerns were raised regarding the age and accuracy of certain data sources and assumptions used in the model. *Id.* at 10. Staff noted that IDL expressed significant concerns that some datasets may underrepresent wildfire risk within the Company’s service territory. *Id.* Staff recommended that the Commission direct the Company to collaborate with IDL and its consultant to address identified deficiencies before submitting future WMPs. *Id.* Staff also

recommended that future risk assessments include more detailed descriptions of modeling inputs and methods, incorporate infrastructure-related ignition risk, explain how mitigation investments reduce overall wildfire risk, and involve consultation with local fire experts to validate model results. *Id.* at 10-11.

Staff believed that the Company's WMP generally satisfied statutory and Guideline requirements related to workforce preparedness, pilot programs, public outreach, governmental coordination, line design, system hardening, situational awareness, infrastructure inspections, operational practices, and vegetation management. *Id.* at 11-12. However, Staff recommended that future WMPs provide additional information regarding training activities, pilot program performance metrics, quality assurance programs, inspection and repair backlogs, Red Flag Warning operational procedures, hazard tree management, vegetation management quality controls, and the process for compensating timber companies for the removal of live marketable timber adjacent to utility rights-of-way. *Id.* at 12. Staff also suggested that certain successful pilot programs, such as the electronic recloser deployment program, eventually be transitioned into the Company's standard wildfire mitigation programs. *Id.* at 13.

Staff agreed that the Company adequately addressed public outreach by communicating wildfire mitigation efforts through multiple channels, including the Ruralite Magazine, its website, bill inserts, and social media, while encouraging continued refinement of community education and engagement efforts in future plans. *Id.* at 13-14. The Company's WMP also satisfied coordination requirements through its Emergency Restoration Plan, which establishes emergency response roles, identifies government and tribal partners, includes mutual aid agreements, and is exercised annually in accordance with federal requirements. *Id.* at 14.

Staff believed that the Company's descriptions of system design, weather monitoring, inspection programs, operational practices, and vegetation management generally meet statutory requirements but identified several opportunities to improve the completeness and usefulness of future WMP filings. *Id.* at 14-19. Although the Company identified several wildfire mitigation design and construction programs, including undergrounding, animal guards, reduced span lengths, avian protection, increased phase spacing, and fire-resistant pole treatments, Staff believed that the WMP lacked sufficient project-level detail, measurable performance targets, cost information, implementation timelines, alternatives considered, and explanations of project benefits. *Id.* at 14. Much of this information was only provided during discovery. *Id.* Staff

recommended that future WMPs include these details within the filing itself and that the Company evaluate whether planned deployment of electronic reclosers has progressed sufficiently to become a standard wildfire mitigation program rather than remaining a pilot initiative. *Id.* at 15.

Staff believed that the Company's weather monitoring program satisfied regulatory requirements by identifying public weather and wildfire information sources and describing its evaluation of a company-owned weather station network. *Id.* at 15-16. However, because the purpose and value of the pilot weather station program relative to existing public data remain unclear, Staff recommended that the Company provide updates on the program's progress and findings in future WMPs. *Id.* at 16.

With respect to inspections and asset maintenance, Staff believed the Company adequately described enhanced inspection practices for high-risk wildfire areas, including annual pre-fire season patrols and increased inspection frequencies. *Id.* Staff recommended expanding future WMPs to provide additional information regarding the Company's quality assurance program, including audit selection criteria, audit frequency, and procedures for addressing deficiencies identified during quality assurance reviews. *Id.* Staff further recommended reporting historical performance metrics on identified deficiencies, repair completion rates by priority level, and outstanding corrective action backlogs to better evaluate maintenance effectiveness and resource needs. *Id.* at 17.

Staff agreed that the Company's operational practices during wildfire season also met statutory requirements, including seasonal operating procedures and policies governing de-energization and re-energization. *Id.* at 17-18. However, Staff recommended that future WMPs explicitly describe operational changes implemented during National Weather Service Red Flag Warning conditions, as these procedures were only provided during discovery. *Id.* at 17. Staff also encouraged the Company to evaluate additional system segmentation that would enable future de-energization actions to be more narrowly targeted, thereby minimizing customer impacts while maintaining wildfire risk reduction. *Id.* at 18.

Staff offered that the Company's routine and enhanced vegetation management programs generally complied with applicable requirements but identified several areas for improvement. *Id.* Staff believed that future WMPs should provide greater detail regarding vegetation management quality assurance procedures, including audit sampling methods and frequencies. *Id.* Staff also recommended tracking and reporting annual hazard tree metrics, including the number of hazard

trees identified, removed, and remaining, to better monitor emerging risks associated with drought, insect infestations, and increasing tree mortality. *Id.* at 19. In addition, Staff suggested the Company consider increasing post-storm hazard tree inspections following significant wind events, particularly in areas containing tree species that are more susceptible to wind damage. *Id.* While the Company confirmed during discovery that it will compensate timber companies for live marketable timber removed adjacent to its rights-of-way as required by the WSCA, Staff recommended that future WMPs include a dedicated section documenting this compensation process to fully satisfy statutory requirements. *Id.* at 20.

Based on its review, Staff recommended that the Commission: (1) approve the Company's 2026 WMP; (2) clarify that future annual WMP updates may be filed on or about January 20 of each year; and (3) direct the Company to work with IDL to address risk-modeling concerns prior to future filings. *Id.* Staff further recommended that future WMPs include enhanced information regarding funding sources, wildfire risk reduction benefits, project-level mitigation details, and timber compensation procedures to improve transparency, accountability, and the Commission's ability to evaluate the effectiveness of the Company's wildfire mitigation efforts. *Id.* at 21.

IDL COMMENTS

IDL reviewed the Company's WMP and identified significant shortcomings that it recommended be addressed prior to approval. IDL Comments at 1. IDL believed that the plan relied on an outdated definition of the Wildland Urban Interface that was inconsistent with current industry standards, resulting in a substantial underrepresentation of wildfire risk to Idaho communities and the Company's service territory. *Id.*

Additionally, the wildfire risk modeling was based on obsolete datasets and methods from 2012 and 2016, which significantly underestimated wildfire risk when compared to current industry-standard models. *Id.* at 2. IDL recommended updating the modeling using current data and incorporating additional risk factors, including the type, age, and condition of system components; vegetation characteristics such as tree canopy height adjacent to utility infrastructure; soil conditions affecting tree stability; and the impacts of damaging wind events on wildfire risk. *Id.*

IDL also encouraged the Company to strengthen its coordination with county Community Wildfire Protection Plans to improve community protection, resource sharing, and wildfire preparedness. *Id.* at 3. The review by IDL noted that the WMP's economic analysis focused on

wildfire impacts rather than the value of mitigation measures and recommended including the economic benefits of mitigation, the costs associated with service disruptions, and the consequences of taking no action. *Id.* IDL further recommended developing a standard operating procedure to address cost recovery for vegetation removal on privately owned forest lands and incorporating that effort into the implementation plan. *Id.*

Regarding vegetation management, IDL believed that while the WMP appropriately referenced arboriculture standards, it did not adequately address wildfire-specific considerations such as ignition potential, fire propagation, and ladder fuels. *Id.* at 3-4. Accordingly, IDL recommended that vegetation inspection qualifications include certifications specific to wildland fire. *Id.*

Finally, IDL identified editorial revisions needed to reflect current information and practices, including updating statements regarding Idaho's fire season declaration process. *Id.*

POTLATCHDELTIC COMMENTS

PotlatchDeltic explained that it owns substantial commercial timberlands within the Company's service territory and adjacent to the Company's electric facilities, making wildfire prevention a matter of critical importance. PotlatchDeltic Comments at 2. PotlatchDeltic argued that approval of the Company's WMP would have significant consequences because the WMP would provide the Company with statutory immunity for actions or omissions taken in reasonable accordance with the approved plan. *Id.*

PotlatchDeltic believed that the Commission's authority under the WSCA is limited to approving or rejecting a WMP, with no continuing authority to supervise or enforce implementation after approval. *Id.* at 3. Because the Commission could not modify a deficient plan or oversee its execution, PotlatchDeltic maintained that any material defect required rejection of the Application. *Id.* at 4.

PotlatchDeltic further argued that approval of an inadequate WMP would improperly shift the financial burden of catastrophic wildfire losses from the utility to landowners, businesses, and the public. *Id.* PotlatchDeltic emphasized that the Company's failure to incorporate a Public Safety Power Shutoff ("PSPS") program distinguished it from other Northern Idaho utilities and fell below the emerging regional standard of care. *Id.* at 5-6. It also contended that the Company's WMP largely duplicated its 2022 wildfire mitigation plan, reflected existing practices rather than new prospective measures required by the WSCA, and repeatedly referred only to wildfire

mitigation measures that the Company was “evaluating” or “developing” rather than committing to implement. *Id.* at 8-9. PotlatchDeltic further criticized the Company’s situational awareness program, arguing that it relied on generalized national resources, outdated or inoperative information sources, and an unimplemented weather station pilot rather than providing meaningful local fire weather intelligence. *Id.* at 9-10.

PotlatchDeltic also argued that the Company’s representations regarding weather stations were misleading because, although the WMP repeatedly described weather stations as valuable and under evaluation, the Company had already decided not to install them while failing to disclose that decision. *Id.* at 10-11. It asserted that the Company’s reliance on local television and radio broadcasts during fire season was inconsistent with the level of wildfire preparedness necessary to justify statutory immunity. *Id.* at 12.

PotlatchDeltic believed that numerous provisions of the WMP merely committed the Company to complying with existing federal and state fire prevention requirements, rather than implementing enhanced wildfire mitigation measures contemplated by the WSCA. *Id.* at 12-13. It maintained that the Company’s discussion of reclosers was similarly misleading because the equipment had existed on the Company’s system for many years, including installations dating back to 2009, and had been deployed primarily for outage restoration rather than wildfire prevention. *Id.* at 14. PotlatchDeltic further criticized the Company’s infrastructure inspection and maintenance programs, noting that these practices long predated the WSCA and therefore did not constitute new mitigation efforts. *Id.* It highlighted the Company’s 15-year inspection cycle for Idaho facilities, contrasting it with Oregon’s ten-year inspection requirement, and argued that the Company failed to explain why a longer inspection interval should be sufficient to warrant statutory immunity. *Id.* Likewise, PotlatchDeltic challenged the Company’s wood pole inspection program, asserting that its claimed inspection rate fell below accepted inspection guidance rates. *Id.* at 14-15.

PotlatchDeltic further believed that the Company had misrepresented its compliance with Rural Utilities Service (“RUS”) guidance by claiming that inspecting 6.6% of its wood poles annually was “in line with” RUS Bulletin 1730B-121. *Id.* at 15. It argued that the bulletin contemplated reinspection approximately every 12 years following the initial inspection, requiring inspection of roughly 8.3% of poles annually, and therefore the Company’s representations overstated its compliance with the RUS Bulletin 1730B-121. *Id.*

PotlatchDeltic also believed that the Company's vegetation management program reflected little more than longstanding compliance with existing state and federal requirements and failed to incorporate enhanced practices responsive to the WSCA. *Id.* at 16. It emphasized the IDL's concern that the Company failed to address the wildfire risk posed by tall trees outside maintained rights-of-way that could strike energized conductors. *Id.* at 17.

PotlatchDeltic further argued that the Company improperly characterized fire-resistant pole wrapping as a wildfire mitigation measure despite the technology merely protecting utility assets during a wildfire, rather than reducing ignition risk or slowing fire spread. *Id.* at 17-18. PotlatchDeltic similarly criticized the Company's discussion of undergrounding, noting that although the WMP acknowledged undergrounding as an effective wildfire mitigation strategy, the Company had neither meaningfully evaluated nor substantially implemented underground conversion projects in high wildfire hazard areas. *Id.* at 19-21.

PotlatchDeltic also argued that the Company understated the significance of utility-caused wildfires by relying on outdated fire-cause information while omitting electric utilities as a meaningful ignition source despite more recent data demonstrating that utility-caused fires represented a measurable percentage of North Idaho wildfires. *Id.* at 21-23. Finally, it asserted that the Company's performance metrics lacked measurable objectives, quantifiable benchmarks, defined terminology, and meaningful methods for evaluating program effectiveness, rendering the WMP incapable of objective assessment. *Id.* at 23-24.

Finally, PotlatchDeltic argued that IDL, acting through the State Forester, had identified significant additional shortcomings in the Company's WMP, including an outdated definition of the wildland-urban interface that substantially understated community wildfire exposure, antiquated wildfire risk modeling that distorted wildfire risk throughout the Company's service territory, the absence of meaningful cost-benefit analysis, and reliance on outdated or inaccurate assumptions. *Id.* at 24-25. It contended that because the WSCA afforded the State Forester's comments a presumption of reasonableness, the Commission would be required to make specific findings to disregard those recommendations, something PotlatchDeltic argued could not be accomplished on the limited evidentiary record created through modified procedure. *Id.* at 25-26. PotlatchDeltic therefore maintained that the Commission had no practical alternative but to reject the WMP and require the Company to submit a revised plan in a future filing. *Id.* at 26.

PotlatchDeltic also criticized Staff's recommendation for approval, arguing that Staff repeatedly acknowledged deficiencies within the WMP itself but attempted to cure those deficiencies by relying on information provided during discovery responses rather than requiring the information to be incorporated into the WMP. *Id.* PotlatchDeltic argued that the Commission lacked authority to rewrite or supplement the WMP through Staff recommendations, and therefore any material omission required rejection of the Application. *Id.* at 28-29. PotlatchDeltic additionally asserted that the Company's inconsistent representations regarding weather stations undermined the credibility of its entire WMP and warranted further scrutiny through an evidentiary hearing. *Id.* at 27.

Finally, PotlatchDeltic raised procedural concerns regarding Staff's meetings and substantive discussions with the Company and IDL, asserting that those communications occurred without notice to PotlatchDeltic, deprived it of the opportunity to participate, and raised due process concerns regarding the validity of Staff's recommendation to approve the WMP. *Id.* at 29-30.

COMPANY REPLY

The Company expressed its appreciation for the thorough review conducted by Staff, the IDL, and PotlatchDeltic and acknowledged their shared commitment to reducing wildfire risk throughout Idaho. Company Reply Comments at 1. The Company agreed with Staff's belief that its 2026 WMP satisfied the requirements of the WSCA, the Commission's Guidelines, and applicable Commission orders, and it supported Staff's recommendation that the Commission approve its 2026 WMP. *Id.* at 2.

The Company also recognized the recommendations provided by IDL and PotlatchDeltic, noting that many of those suggestions involved additional information, enhanced analyses, and future refinements that could be considered as its planning efforts continued to evolve. *Id.* at 2-3. Accordingly, the Company stated that it intended to evaluate those recommendations during the development of future WMPs. *Id.* at 3.

The Company maintained that the central issue before the Commission was whether the 2026 WMP complied with the statutory and regulatory requirements established by the Legislature and the Commission, rather than whether additional information or alternative methods could be incorporated into future plans. *Id.* at 5. It emphasized that wildfire mitigation planning was an evolving process and that future WMPs would likely include expanded analyses, operational

experience, improved data, and lessons learned. *Id.* at 5-6. The Company noted that, although Staff identified several areas where future filings could provide additional discussion—including wildfire risk modeling, mitigation metrics, project-level information, quality assurance procedures, funding opportunities, and related topics—Staff did not conclude that the current WMP was deficient. *Id.* at 6. Instead, Staff expressly believed that the WMP met all applicable requirements and recommended its approval. *Id.* at 6-7.

The Company similarly acknowledged the recommendations of IDL and PotlatchDeltic regarding additional datasets, infrastructure and vegetation information, and alternative wildfire risk assessment methods. *Id.* at 3-4. While agreeing that wildfire risk assessment practices continued to evolve and that future WMPs could benefit from the use of additional analytical tools and data sources, the Company believed that differing opinions regarding preferred methods did not demonstrate noncompliance with the WSCA. *Id.* at 4. It emphasized that the statute did not prescribe any specific wildfire risk model, dataset, mapping platform, or analytical framework, but instead required utilities to identify wildfire risks and develop plans to mitigate them. *Id.*

In response to PotlatchDeltic's request that the Commission reject the WMP, the Company disagreed, believing that the comments primarily reflected differences of opinion regarding methods, mitigation priorities, weather monitoring strategies, vegetation management practices, and the level of detail included in the WMP. *Id.* at 5. The Company argued that the WSCA did not require utilities to adopt particular risk models, datasets, mitigation measures, technologies, or commenter recommendations, but instead required utilities to develop wildfire mitigation plans that reflected their individual circumstances and operations. *Id.* The Company maintained that its WMP satisfied those requirements by identifying wildfire risks, describing existing and planned mitigation activities, and establishing a framework for continued wildfire risk reduction. *Id.*

Finally, the Company emphasized that many of the mitigation measures described in the WMP built upon longstanding operational programs that predated the enactment of the WSCA and that the existence of those preexisting programs did not diminish their effectiveness as wildfire mitigation measures. *Id.* at 6. The Company concluded that neither IDL's nor PotlatchDeltic's recommendations established that the WMP failed to comply with applicable statutory or regulatory requirements. *Id.* It ultimately asserted that the record supported Staff's determination that the WMP satisfied all applicable requirements and respectfully urged the Commission to adopt Staff's recommendation and approve the Company's WMP. *Id.* at 6-7.

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 Company's 2026 WMP is its first WMP submitted for Commission 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. The Commission does not expect a utility's first WMP to address every potential wildfire risk or contain every possible refinement that may be identified over time. We understand that subsequent WMPs will look different from the first.

However, the Legislature established minimum requirements that must be satisfied before the Commission may approve a WMP. Those requirements ensure that an approved WMP provides a sufficient description of the utility's wildfire risks, mitigation efforts, operational practices, and plans for reducing wildfire risk. Because approval of a WMP under the WSCA provides statutory protections available to a utility that reasonably implements an approved plan, the Commission must ensure that the record supports the necessary findings before granting approval.

The Commission has reviewed the record in this case, including the Company's 2026 WMP, Staff's comments, IDL's comments, PotlatchDeltic's comments, and the Company's reply comments. The Commission appreciates the efforts of all parties that participated in this proceeding and recognizes the importance of their shared goal of reducing wildfire risk throughout Idaho.

The Commission also acknowledges the Company's cooperation throughout Staff's review. The Company worked with Staff, responded to discovery requests, and provided additional information regarding several portions of the WMP where Staff sought clarity or supporting documentation. The Commission finds that the additional information provided by the Company

was helpful and demonstrates the Company's willingness to engage in the review process. However, information provided only through discovery may assist the Commission's review, but it does not fully resolve material omissions or limitations within the filed WMP.

The Commission finds that the Company's WMP demonstrates meaningful efforts to reduce wildfire risk. The WMP identifies existing mitigation programs, describes the Company's operational practices, and establishes a framework for continued improvement. The Commission agrees with Staff that portions of the WMP address important areas, including vegetation management, inspections, system maintenance, public outreach, emergency response planning, and coordination efforts.

Nevertheless, based on our review of the record, the Commission finds that further development is necessary before the Company's WMP can be approved. The record identifies several areas where the WMP does not provide the level of detail, analysis, or plan implementation necessary for the Commission to determine that the plan satisfies the minimum statutory requirements of the WSCA.

I. Wildfire Risk Assessment and Modeling

The Commission finds that the Company's wildfire risk assessment requires further development before approval of a WMP can be granted.

The Commission recognizes that wildfire risk modeling is an evolving area and that utilities may reasonably consider different methods and data sources. While the Commission recognizes that the WSCA does not prescribe a specific wildfire risk model or a particular analytical framework, we find that the risk assessment used in a WMP must provide a reasonable basis for identifying wildfire exposure and prioritizing mitigation activities within the Company's service territory.

The Commission must give significant consideration to the comments submitted by IDL. As explained above, under the WSCA, the Commission is required to consider recommendations provided by the State Forester. *Idaho Code* § 61-1804. IDL raised concerns that the Company's risk assessment relied on outdated information and assumptions that may understate wildfire risk within the Company's service territory. Staff similarly recognized concerns regarding certain data sources and recommended that the Company work with IDL and its consultant to address those issues.

The Commission finds these concerns reasonable and agrees that the concerns should be addressed so that the Company's WMP sufficiently demonstrates how the Company plans to: (1) minimize wildfire risk; (2) provide an effective response to potential wildfire events; and (3) conduct an appropriate geographical risk assessment and situational awareness and monitoring.

Accordingly, future WMP filings should include additional information regarding wildfire risk modeling, including updated datasets and methods, consideration of system-specific risk factors, vegetation conditions near infrastructure, soil conditions affecting tree stability, damaging wind events, and other factors identified by IDL and Staff in their respective comments.

II. Mitigation Measures and Implementation Details

The Commission finds that future WMP filings should provide greater detail regarding the Company's wildfire mitigation programs and the extent to which those programs are implemented, planned, or still under evaluation.

The Commission recognizes that many of the Company's wildfire mitigation activities build upon existing operational programs. The Commission acknowledges that a mitigation measure is not ineffective simply because it existed before the enactment of the WSCA. However, the WMP must provide sufficient information to allow the Commission to understand how those existing programs help to reduce wildfire risk going forward, how the Company evaluates their effectiveness, and how the Company prioritizes mitigation investments.

The record demonstrates that several mitigation efforts discussed in the WMP remain in development or are being evaluated. The Commission understands that utilities must consider costs, feasibility, and operational impacts when developing and implementing wildfire mitigation programs. At the same time, an approved WMP must provide a clear description of the mitigation measures the Company is undertaking to reduce wildfire risk. Thus, future WMP filings should provide information regarding mitigation projects, including expected wildfire risk reduction benefits, project execution timelines, costs, alternatives considered, funding sources, and measurable performance objectives.

III. Performance Metrics, Cost Information, and Transparency

The Commission finds that additional performance information is necessary for future WMP filings to improve the Commission's ability to evaluate the effectiveness of the Company's wildfire mitigation efforts. Specifically, information should include consistent performance metrics, historical trend data, project-level cost information, quality assurance programs, and

explanations of how specific mitigation investments reduce wildfire risk. We find that this information will allow the Commission and interested stakeholders to evaluate whether mitigation programs are achieving their intended objectives and whether future adjustments are necessary.

The Company should also provide more detailed economic analyses that demonstrate not only the costs associated with wildfire mitigation activities, but also the benefits of those activities, including avoided wildfire impacts and the consequences of not implementing mitigation measures.

IV. Vegetation Management and Operational Practices

The Commission finds that additional information regarding vegetation management and operational practices is necessary in future WMP filings.

The Commission acknowledges that the Company's vegetation management program addresses many important requirements of the WSCA and the Guidelines. However, the Commission agrees with IDL and Staff that future filings should expand on how the Company will address wildfire-specific vegetation risks, including ignition potential, ladder fuels, hazard trees, vegetation management quality assurance procedures, and inspection practices.

The Commission also finds that future WMP filings should provide additional information regarding operational practices during heightened wildfire conditions, including Red Flag Warning procedures, system segmentation considerations, and other operational decisions intended to reduce wildfire risk while minimizing customer impacts.

V. PotlatchDeltic Comments

The Commission acknowledges PotlatchDeltic's participation in this proceeding and the importance of wildfire mitigation planning to PotlatchDeltic as a timberland owner with property located within the Company's service territory. We value PotlatchDeltic's input and evaluation of the Company's WMP and appreciate PotlatchDeltic's concerns regarding the importance of ensuring that an approved WMP provides a complete and meaningful framework for wildfire risk reduction. We understand several concerns raised by PotlatchDeltic are consistent with issues identified by Staff and IDL, particularly regarding the need for greater detail, measurable objectives, improved risk assessment, and a clearer distinction between existing practices and future mitigation initiatives. We find that requiring the Company to provide additional information regarding wildfire risk assessment and modeling, mitigation measures and their implementation,

performance metrics, cost information and transparency, and vegetation management and operational practices will address PotlatchDeltic's concerns.

VI. Conclusion

The Commission recognizes the significant work undertaken by the Company in preparing its first WMP 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 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 continued wildfire mitigation efforts but does not contain sufficient information or implementation detail for the Commission to make the findings necessary for approval under the WSCA.

Accordingly, the Commission denies the Company's Application for approval of its 2026 WMP without prejudice. The Commission encourages the Company to continue working with Staff, IDL, PotlatchDeltic, and other stakeholders as it develops its next WMP. The Commission expects that future filings will address the concerns identified in this Order, with particular attention to IDL's recommendations regarding wildfire risk modeling, updated data sources, system-specific risk factors, vegetation considerations, community coordination, and economic analysis.

A future WMP that incorporates these improvements and provides sufficient detail regarding mitigation measures, implementation plans, costs, benefits, and performance evaluation 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 Company's 2026 WMP is denied.

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 7 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 16th day of July 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary

I:\Legal\ELECTRIC\CO1-E-26-01_CWP WMP\orders\CO1E2601_final_em.docx