

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF KOOTENAI ELECTRIC) CASE NO. CO7-E-25-01
COOPERATIVE, INC.’S APPLICATION FOR)
APPROVAL OF ITS 2026-2028 WILDFIRE) ORDER NO. 37081
MITIGATION PLAN)
)

On December 31, 2025, Kootenai Electric Cooperative, Inc. (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting approval of its 2026-2028 Wildfire Mitigation Plan (“2026 WMP”) (“Application”), in accordance with Wildfire Standard of Care Act (“WSCA”) *Idaho Code* § 61-1801, *et seq.* (“Application”). Application at 1.

On January 23, 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. 36911. No petitions to intervene were filed. On February 19, 2026, the Commission issued a Notice of Modified Procedure, establishing public comment and Company reply deadlines. Order No. 36939. Idaho Department of Lands (“IDL”) filed public comments after the public comment deadline.

Based on our review of the record, we issue this Final Order conditionally approving 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 electric corporations that are municipal and cooperative utilities 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 utility’s WMP. Order No. 36774 at 14. If a municipal or cooperative utility 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

utility'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; (9) vegetation management.

THE APPLICATION

The Company attached a full copy of its 2026 WMP as Attachment 1 to the Application. The Company stated that its WMP was structured to comply with the Guidelines and the WSCA by utilizing a rolling three-year planning horizon and incorporating detailed implementation plans for vegetation management, construction work, and system inspections for the 2026-2028 period. Application at 3. The Company represented that its 2026 WMP identified geographic areas in the Company's service territory that are subject to heightened wildfire risk using a multi-factor risk assessment. *Id.* at 4. The Company explained that the multi-factor risk assessment considered vegetation, weather, topography, historical fire activity, and asset location, with most of the Company's service territory being classified as medium to very high risk. *Id.* at 3-4.

The Company represented that its 2026 WMP outlined comprehensive preventive programs, including situational awareness supported by weather and fire-risk modeling tools, systematic asset inspections, enhanced vegetation management practices, operational protocols during elevated fire risk conditions, and the potential use of Public Safety Power Shutoffs. *Id.* at 4-8. The Company's 2026 WMP also outlined the Company's community outreach and coordination with federal, state, tribal, and local agencies to ensure there was effective wildfire preparedness, communication, and emergency response. *Id.* at 8-9. The Company represented that its board of directors reviewed the 2026 WMP and that the board of directors formally accepted the 2026 WMP and determined that the 2026 WMP was feasible, financially prudent, and reasonably balanced mitigation costs with wildfire risk reduction. *Id.* at 11.

STAFF COMMENTS

Staff reviewed the 2026 WMP for compliance with the requirements of the WSCA and the Guidelines. 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 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 sources pursued;
3. Include wildfire risk mitigation benefits, applying a consistent, transparent, and repeatable methodology across projects;
4. Include all metrics used within each respective section and provide the data in a format that can easily be tracked across WMP filings;
5. Provide an explanation of how certain mitigation activities (such as grid hardening efforts) are reducing wildfire risk;
6. Overlay its service territory boundaries on the Heightened Wildfire Risk Map;
7. Include a more detailed explanation of how each heightened wildfire risk zone was determined;
8. Narratively explain how the Company divides its territory and explain how it prioritizes wildfire-related projects in each section;
9. Include wildfire-related project-level details that includes targets, expected wildfire mitigation benefits, and alternatives considered within the respective sections of the WMP;
10. Include the Company's process for compensating timber companies for marketable timber marked for removal on land adjacent to Company's ROW; and
11. 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. Staff also recommended the Commission clarify that the Company can file an updated WMP annually on or about December 31 of each year for Commission review and approval. *Id.*

I. 2026 WMP Overview & Cross Cutting Elements

a. Cost Feasibility

Staff noted that the Company's cost forecasts for its: (1) Vegetation Management Implementation Plan; (2) Construction Work Implementation Plan; and (3) System Inspection Implementation Plan (collectively the "Cost Forecasts") did not include specific wildfire-related expenses. *Id.* at 4. In a meeting with Staff, the Company represented that it considered wildfire mitigation "in all aspects of its daily operations" due to the Company's service territory and that it

could not “isolate costs for only wildfire mitigation.” *Id.* at 5. However, based on Staff’s review of material the Company supplied to Staff in discovery, Staff believed the Company could isolate costs for wildfire-related projects. *Id.*

Because the Company was able to provide information on costs for work related to wildfire in a response to Staff’s production request, Staff believed the Company sufficiently provided information on the costs to implement the 2026 WMP. *Id.* However, Staff believed WMP implementation costs must be included in an electric corporations WMP under the WSCA (*Idaho Code* § 61-1804(1)(b)), and not through discovery. *Id.* Thus, 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.*

i. 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 6. In response to Staff’s discovery requests, the Company supplied information on grants it applied for related to wildfire mitigation. *Id.* Because the Company was able to provide information on alternative funding in responses to Staff’s production requests, Staff believed the Company sufficiently provided information on the costs to implement the 2026 WMP. *Id.*

However, 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 evaluate 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, to help fund its wildfire mitigation efforts in any future WMP filings. *Id.*

ii. Cost-Benefit Approach

Staff explained that because the Company provided some information on the feasibility of the 2026 WMP and a cost-benefit analysis of the 2026 WMP in meetings with Staff and in responses to Staff’s production requests, Staff believed the Company satisfied the requirements under the WSCA (*Idaho Code* § 61-1804(1)(b)) and the Guidelines to provide information on wildfire risk mitigation benefits in the 2026 WMP. *Id.*

However, Staff believed information on wildfire risk mitigation benefits must be included in an electric corporation’s WMP under the WSCA and Order Nos. 36774 and 36882, and not through discovery. *Id.* Thus, Staff recommended the Commission direct the Company to include information on wildfire risk mitigation benefits in any future WMP filings. *Id.* Further, Staff

recommended the Commission direct the Company to apply “a consistent, transparent, and repeatable methodology” on all projects for wildfire mitigation. *Id.* Additionally, if the Company identifies qualitative benefits, Staff recommends the Company define the benefits, explain how the benefits help mitigate wildfire risk, and to quantify the reduction of risk for particular infrastructure mitigation measures. *Id.*

b. Cross Cutting Elements

i. Targets and goals within WMP

Staff believed the Company provided sufficient information on its objectives for managing vegetation and inspecting the Company’s system in the 2026 WMP and through discovery. *Id.* at 7. Thus, Staff thought the Company provided enough information for the Commission to evaluate the 2026 WMP’s feasibility and to what extent the 2026 WMP minimized risk of wildfire, as required under the WSCA (*Idaho Code* § 61-1804(1)(c)). *Id.* While Staff believed the information provided was sufficient, Staff encouraged the Company to include additional information on objectives in future WMP filings. *Id.*

ii. Metrics

Staff believed the Company provided enough information on the metrics the Company uses to measure and track the effectiveness of the Company’s grid hardening efforts. *Id.* However, Staff argued information on metrics used to track the effectiveness of wildfire mitigation efforts must be included in the 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.*

While Staff believed the Company provided sufficient information through discovery on the metrics it uses in the 2026 WMP, Staff encouraged the Company to use industry-standard metrics including System Average Interruption Duration Index, System Average Interruption Frequency Index, Customer Average Interruption Duration Index, and Monetary Average Interruption Frequency Index for a period of three years to track and assess the performance and success of vegetation management and maintaining the Company’s system. *Id.* at 7–8.

II. Geographical Risk Assessments

a. Limitations of Risk Modeling

Staff explained that even though it thought the Company’s use of data from the United States Forest Service Wildfire Risk to Communities combined with Overstory mapped data of the

vegetation in the Company's service territory to model wildfire risk in its territory was reasonable due to the size and complexity of the Company, Staff believed the Company may have been overweighing the vegetation risk in its territory. *Id.* at 10. Thus, Staff argued that so long as the Company acknowledged the limitation of the type of vegetation data used in the Company's process to model wildfire risk in its territory, it would be appropriate for the Company to continue to utilize its current process. *Id.*

However, while Staff stated the Company's model did consider risk due to external factors, it believed the Company's 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.* Thus, Staff recommended the Commission direct the Company to include narratives on how the Company's investments in its system have reduced wildfire risk in any future WMP filings. *Id.*

b. Heightened Risk Area Map

Staff explained that because the Company provided a map of its heightened wildfire risk areas, and provided information in meetings with Staff on how the Company divides and prioritizes sections of its service territory, Staff believed the Company satisfied the requirement under the Guidelines to depict risk areas in its service territory. *Id.* at 10–11.

However, Staff opined that overlaying the boundaries of the Company's service territory on its heightened wildfire risk area map would help the Commission review the heightened wildfire risk area in the Company's service territory. *Id.* at 10. Further, Staff believed that information on how the Company divides and prioritizes sections of its service territory must be included in an electric corporation's WMP under the Guidelines, and not through discovery. *Id.* at 11. Thus, Staff recommended the Commission direct the Company to: (1) overlay its service boundary on the Company's heightened wildfire risk area map; and (2) include information on how the Company divides and prioritizes sections of its service territory in any future WMP filings. *Id.*

III. Optional Preventative Actions & Programs

Staff believed the information the Company supplied regarding its workforce's preparedness in discovery met the Guidelines' recommendations on including optional preventative actions in a WMP. *Id.* Staff encouraged the Company to include in future WMP filings information on: (1) frequency of training; (2) roles of employees; (3) topics and focus areas; and (4) the number of employees trained. *Id.*

IV. Method of Line Design & Grid Hardening

Staff believed the initial cost forecast provided on Page 26 of the WMP was insufficient to satisfy the requirements of the WSCA (*Idaho Code* §§ 61-1803(3)(b), 61-1803(3)(e)) and the Guidelines. *Id.* at 12–13. However, Staff explained that because the Company supplied additional information on: (1) the Company’s line design methods for planned system upgrades; (2) a cost-benefit evaluation of the Company’s projects; and (3) the Company’s selection method for its projects in discovery, Staff believed that the Company satisfied the requirements of the WSCA and the Guidelines. *Id.* at 13. Staff believed sufficient cost forecasts 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 future WMP filings. *Id.*

V. Situational Awareness & Monitoring

Staff explained that because the 2026 WMP included information on the Company’s current method for monitoring weather, and because the Company supplied additional information on weather monitoring to Staff 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.* Even though Staff considered the information on the Company’s weather monitoring in the 2026 WMP sufficient, Staff encouraged the Company to: (1) include more information related to the Tempest Daily Awareness Tool; (2) narratively describe the work the Company is already doing as it is related to its weather station network; and (3) provide more detail on the Company’s planned future weather station installations in future WMP filings. *Id.* at 13–14.

VI. Infrastructure Inspection & Maintenance

Staff believed that the material on standards and frequency of electric infrastructure inspections included in the 2026 WMP, and supplied to Staff through discovery, satisfied the WSCA (*Idaho Code* §§ 61-1803(3)(b), 61-1803(3)(g)(i)) and the Guidelines that require a WMP to describe a utility’s standards, efforts, and goals to inspect its electric infrastructure in areas of heightened wildfire risk. *Id.* at 14. Even though Staff considered the information on the Company’s standards and frequency of electric infrastructure inspections in the 2026 WMP sufficient, Staff encouraged the Company to: (1) further develop its inspection and remediation process to support tracking the length of a deficiency and timely repairs/resolutions of a deficiency; and (2) include

in future WMP filings more descriptions on the Company's quality assurance process for infrastructure inspections and maintenance. *Id.* at 15.

VII. Vegetation Management

Staff believed the information in the 2026 WMP on the Company's process for vegetation management was insufficient to satisfy the requirements of the WSCA (*Idaho Code* § 61-1803(3)(g)(iii)) and the Guidelines. *Id.* at 16. Staff explained this was because the 2026 WMP did not include information on compensating timber companies for "live, marketable timber identified for removal from a timber company adjacent to the Company's Right of Way..." which Staff believed must be included in a WMP. *Id.* at 18 (citing *Idaho Code* § 61-1803(3)(g)(iii)).

However, Staff explained that because the Company provided information on the Company's process for "compensating timber companies for marketable timber..." through discovery, Staff believed the Company satisfied the requirements under the WSCA and Guidelines to supply such information. *Id.* at 18. Staff stated the information on compensation to timber companies must be included in an electric corporation's WMP under the WSCA and the Guidelines, and not through discovery. *Id.* Staff recommended the Commission direct the Company to include material on timber compensation to timber companies in any future WMP filings. *Id.*

Even though Staff believed the information provided in the 2026 WMP, and through discovery, met the requirements for vegetation management, Staff encouraged the Company to improve: (1) vegetation management training; (2) tracking and inspecting hazard trees; (3) the metrics used to assess the effectiveness of the Company's vegetation management; and (4) quality assurance determinations of vegetation management practices. *Id.* 16–18.

PUBLIC COMMENTS

I. IDL Comments

IDL expressed concerns with the Company's risk modeling. IDL Comments at 1. Specifically, IDL argued that because information on the Company's system was not included, it was difficult to determine the risks wildfire posed to the Company's infrastructure, and the risks the Company's infrastructure posed for wildfire ignition. *Id.* IDL requested that the Company's future modeling include information on the Company's system to qualify the risks of wildfire to and from the Company's system. *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 the system infrastructure; 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, damaging wind events that IDL believe occur frequently in the Company’s service territory. *Id.* at 2. IDL believed there is an opportunity for “cross integration” between county level Community Wildfire Protection Plans (“CWPP”) and the utility’s wildfire mitigation plan and thus encouraged the Company to work with counties where the Company’s system is located to improve wildfire response and mitigation efforts. *Id.*

IDL believed the Company’s cost breakdown was general and recommended the Company provide more localized examples. *Id.* IDL also encouraged the Company to evaluate the cost of no mitigation efforts to provide more information on the impacts of expenditure investment. *Id.* at 2–3. IDL questioned whether a standard operating procedure (“SOP”) existed for the Company’s work on industrial lands, and if the Company did not have a SOP for that work, IDL recommended the Company develop one. *Id.* at 3. Regarding the Company’s vegetation management, IDL recommended the Company’s inspection qualification standards include wildland fire certification. *Id.*

COMPANY REPLY

The Company filed reply comments in response to Staff’s comments but noted that because IDL submitted comments on May 26, 2026, after the public comment deadline, the Company did not have sufficient time to review and respond to IDL’s comments. Company Reply at 1. Thus, the Company’s reply was limited to responding only to Staff’s comments. *Id.* The Company stated that it would consider IDL’s comments and to the extent the comments were in line with the WSCA, the Company would implement IDL’s recommendations in its next WMP filing. *Id.*

The Company represented it has approximately 120 employees and serves about 30,000 members. *Id.* at 4. The Company requested the Commission approve the 2026 WMP and indicated it is willing to supply additional information “reasonably required by the Commission.” *Id.* at 4–5. The Company asked that when reviewing Staff’s recommendations that the Company include additional information in future filings, that the Commission consider the Company’s size and available resources so that any additional requirements do not create an undue burden for the Company. *Id.* at 5.

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 has reviewed the record in this case. Based on our review, we find that the 2026 WMP, and the information the Company supplied in discovery, satisfies the minimum statutory requirements set forth in *Idaho Code* § 61-1803(3)(a)-(g) and the Guidelines. Specifically, the Commission finds that the 2026 WMP and the supplemental information provided 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) how the Company compensates timber companies; and (7) information on the Company’s weather station network (collectively “Supplemental Information”) is consistent with what is required under the WSCA and the Guidelines.

However, because the Supplemental Information was provided by the Company through discovery, and not in the 2026 WMP, the Commission approves the 2026 WMP on the condition that the Company file an updated 2026 WMP with the 2026 WMP Update Materials (defined below) included, within 14 days from the date of the Commission’s order in this case. Further, due to the Commission’s obligation under the WSCA to consider IDL’s recommendations, and the presumption of their reasonableness under the WSCA, because we find that the IDL Recommendations (defined below) are reasonable, just, and in the public interest, the Company must incorporate the IDL Recommendations in any future WMP filings.

I. 2026 WMP

The Commission finds that the 2026 WMP and Supplemental Information adequately address the Company’s 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. In making this finding, the Commission considered: (1) the public interest, specifically, public health, safety, and

welfare; (2) the feasibility of the proposed mitigation measures; and (3) the anticipated costs of implementation.

a. Updated 2026 WMP Filing

While the Commission finds that the 2026 WMP and Supplemental Information satisfies the requirements under WSCA and the Guidelines, the Commission finds that the Supplemental Information must be included in the 2026 WMP and in future WMP filings, should the Company file again for Commission review and approval. 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 2026 WMP is approved on the condition that the Company make a compliance filing with the following information (collectively the "2026 WMP Update Materials") incorporated into the 2026 WMP within 14 days of the date this Order:

- i. Detailed, wildfire-related project-level cost forecasts for each year, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 1 Item 1-Exhibit A;
- ii. Details of all funding alternatives and sources the Company pursued, consistent with the information that was supplied in the Company's Response to Staff's Second Production Request at No. 15 and the Company's Response to Staff's Second Production Request at No. 16;
- iii. Wildfire risk mitigation benefits, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 1;
- iv. All metrics used within each respective section of the WMP and provided in a format that can easily be tracked across WMP filings, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 11;
- v. The Heightened Wildfire Risk Map overlaid with the Company's service territory boundaries;
- vi. A narrative explanation on how the Company divides its territory and how it prioritizes wildfire-related projects in each section, consistent with the explanation the Company provided in a meeting with Staff;
- vii. Wildfire-related project-level details that include targets, expected wildfire mitigation benefits, and alternatives considered within the respective sections of the WMP, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 1 Item 1-Exhibit A;

- viii. The Company's process for compensating timber companies for marketable timber marked for removal on land adjacent to Company's ROW, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 4; and
- ix. Details about the Company's weather station network, including areas of focus, average cost, and any metrics it will use to evaluate success of said network, consistent with the information that was supplied in the Company's Response to Staff's First Production Request at No. 14.

The 2026 WMP Update Materials must be included in any future WMP filings submitted by the Company. Due to the requirements established for WMPs under the WSCA and the Guidelines, the Company must also include the following information in any future WMP filings:

- i. Information on wildfire risk mitigation benefits that shows the Company is applying a consistent, transparent, and repeatable methodology across projects;
- ii. An explanation of how certain mitigation activities (such as grid hardening efforts) are reducing wildfire risk; and
- iii. A more detailed explanation of how each heightened wildfire risk zone was determined.

Should the Company fail to file with the Commission an updated 2026 WMP with the 2026 WMP Update Materials incorporated within 14 days of this Order, the Commission will by its order revoke its approval of the 2026 WMP. If the Company files with the Commission an updated 2026 WMP with the 2026 WMP Update Materials incorporated within 14 days of the Commission's order in this case, then we find that the Company may file an updated WMP annually on or about December 31 of each year for Commission review and approval.

We find that incorporating the 2026 WMP Update Material in the 2026 WMP will ensure that the 2026 WMP comprehensively describes the Company's operational and mitigation measures, in accordance with the WSCA. Further, we find it reasonable to require the Company to incorporate the 2026 WMP Update Materials in the 2026 WMP because the 2026 WMP Update Material was supplied by the Company in discovery and meetings with Staff.

II. IDL Recommendations

The Commission acknowledges the timing of IDL's comments limited the Company's opportunity to respond to IDL's recommendations. However, the Commission's procedural rules must be "liberally construed to secure just, speedy, and economical determination of all issues..." IDAPA 31.01.01.013. Thus, "[u]nless prohibited by statute, the Commission may permit deviation from these rules when it finds compliance with them is impracticable, unnecessary, or not in the public interest." *Id.* Due to the Commission's statutory obligation to consider IDL's recommendations, the Commission has considered IDL's late filed comments in this case.

Accordingly, 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"):

- i. Include information on the Company's system in the Company's future modeling to qualify the risks of wildfire to and from the Company's system;
- ii. For the Company's future assessments of wildfire risk, include data on:
 - a. The Company's system components;
 - b. Where trees surrounding the Company's system are taller than the Company's surrounding infrastructure; and
 - c. Information on soil types.
- iii. Include information on the risks associated with, and mitigation efforts for, damaging wind events;
- iv. Work with counties where the Company's infrastructure is located to improve wildfire response and mitigation efforts;
- v. Provide more localized examples of the Company's cost breakdown;
- vi. Evaluate the cost of no mitigation efforts to provide more information on the impacts of the Company's expenditures; and
- vii. Develop a SOP for the Company's work on industrial lands, if one does not exist already.

While the Commission is unopposed to IDL's position that vegetation inspection practices and certification standards should address conditions specific to wildfire risks (IDL Recommendation No. 7), 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 the Company's next WMP, it 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.

ORDER

IT IS HEREBY ORDERED that the 2026 WMP is approved subject to the condition that the Company must file with the Commission as a compliance filing an updated 2026 WMP with the 2026 WMP Update Materials incorporated within 14 days of this Order.

IT IS FURTHER ORDERED that the Company shall incorporate the 2026 WMP Update Materials outlined in this order in future WMP filings, 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.

IT IS FURTHER ORDERED that the Company shall incorporate in future WMP filings: (1) information on wildfire risk mitigation benefits that shows the Company is applying a consistent, transparent, and repeatable methodology across projects; (2) an explanation of how certain mitigation activities (such as grid hardening efforts) are reducing wildfire risk; and (3) a more detailed explanation of how each heightened wildfire risk zone was determined, provided that such material may be reasonably adjusted to account for change in facts, circumstances, available data, applicable assumptions, and other relevant factors.

IT IS FURTHER ORDERED that should the Company satisfy the condition that the Company must file with the Commission as a compliance filing an updated 2026 WMP with the 2026 WMP Update Materials incorporated within 14 days of this Order, then the Company may file its future annual WMP on or about December 31 of each year.

IT IS FURTHER ORDERED that should the Company fail to file with the Commission an updated 2026 WMP with the 2026 WMP Update Materials incorporated within 14 days of this Order, the Commission will by its order revoke its approval of the 2026 WMP.

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.

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DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 29th day of June 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary
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