

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) CASE NO. IPC-E-25-32
COMPANY’S APPLICATION FOR)
APPROVAL OF THE COMPANY’S 2026)
WILDFIRE MITIGATION PLAN) ORDER NO. 37004
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On October 14, 2025, Idaho Power Company (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) for approval of its 2026 Wildfire Mitigation Plan (“Application”). A copy of the proposed 2026 Wildfire Mitigation Plan (“WMP”) was attached to the Application as Attachment 1.

On November 6, 2025, the Commission issued a Notice of Application and Notice of Intervention Deadline, setting a deadline for interested parties to intervene. Order No. 36835. Intervention was granted to Micron Technology, Inc. (“Micron”) and the Idaho Department of Lands (“IDL”). Order No. 36865

On December 31, 2025, the Commission issued a Notice of Modified Procedure, establishing deadlines for public comments and Company reply comments. Order No. 36895.

Based on our review of the record, the Commission now issues this Final Order approving the Company’s 2026 WMP.

BACKGROUND

On July 1, 2025, the Wildfire Standard of Care Act (“WSCA”), *Idaho Code* § 61-1801 *et seq.*, became effective. The WSCA requires electric corporations that are public utilities, as defined in *Idaho Code* §§ 61-119 and 61-129, to file WMPs with the Commission for approval. *Idaho Code* § 61-1803(2)(a). Municipal and cooperative utilities may also submit WMPs for review. *Idaho Code* § 61-1803(2)(b).

Commission-approved WMPs must be implemented and updated annually. *Idaho Code* § 61-1804(4). A Commission-approved WMP establishes “measures for the electric corporation to prepare for and address wildfire risk” and defines the corporation’s duty to its members and the public. *Idaho Code* § 61-1805. In any lawsuit seeking wildfire-related damages, an electric corporation that reasonably implements a Commission-approved WMP is presumed to have acted

without negligence with respect to the cause of the fire; however, this presumption may be rebutted. *Idaho Code* § 61-1806(1). Each approved WMP must be reviewed and updated annually, and every electric corporation must submit annual compliance reports, or reports as otherwise directed by the Commission. *Idaho Code* §§ 61-1803(4), 61-1804.

On September 30, 2025, the Commission issued Order No. 36774, which established a filing schedule requiring the Company to submit its WMP no earlier than October 1, 2025, and to provide annual updates one year after each previously approved WMP. Order No. 36774 at Exhibit A.

THE APPLICATION

The Company stated that its WMP was designed to protect the public interest while accounting for the scale and complexity of the Company's operations and the specific wildfire risks present in areas where its infrastructure and equipment are located. Application at 5-6. The Company applied a risk-based cost-benefit framework to identify and prioritize wildfire mitigation measures, seeking to reasonably balance the cost of mitigation activities with the level of wildfire risk reduction achieved. *Id.* at 6. The Company's approach began with an assessment of the potential costs associated with wildfires, followed by identification of key wildfire risk drivers, and culminated in the selection of cost-effective mitigation strategies intended to reduce wildfire risk. *Id.*

Although the Company reviewed multiple data sources on the costs of major wildfires, it concluded that precise quantification of potential future wildfire costs was not feasible due to the variability in factors such as jurisdictional differences, weather, fuel conditions, topography, population density, and litigation outcomes. *Id.* Nevertheless, publicly available analyses demonstrated that prudent mitigation could significantly reduce the likelihood or consequences of catastrophic wildfire events. *Id.*

To support mitigation planning, the Company employed a structured wildfire risk management framework within its 2026 WMP. *Id.* at 6-7. This framework enabled the identification, assessment, and management of wildfire risks associated with Company equipment. *Id.* Internal subject matter experts contributed to identifying potential ignition drivers and developing ignition scenarios, risk drivers, likelihoods, and potential impacts. *Id.* at 7. The Company used this information, together with its wildfire risk zone analysis, to direct mitigation

efforts toward geographic areas and infrastructure most susceptible to heightened wildfire risk. *Id.* at 7-8. The Company intended each mitigation strategy to reduce the frequency of risk drivers or limit the potential impacts of wildfire events, while also potentially producing co-benefits such as improved safety, reliability, and system resiliency. *Id.* at 8.

The Company assessed wildfire risk using both qualitative and quantitative methods to identify Wildfire Risk Zones in areas where Company infrastructure could face elevated wildfire risk. *Id.* at 8-9. In collaboration with an external wildfire-risk consultant, the Company applied risk-based wildfire spread modeling that incorporated weather modeling, fire spread simulations, and Monte Carlo analysis. *Id.* at 9. The resulting data was organized into draft risk tiers using Jenks optimization methods and were further refined through qualitative considerations, including emergency access, fire response capability, feedback from fire management agencies, and community input regarding growth in the wildland-urban interface. *Id.* at 10. Through this process, the Company identified Tier 2 and Tier 3 wildfire risk zones, with Tier 3 representing areas of comparatively higher risk. *Id.* at 11. These zones were displayed on publicly available maps and updated through an iterative review process that included annual qualitative adjustments to account for changing conditions such as vegetation changes following wildfire events. *Id.*

The Company implemented numerous preventive actions and programs to reduce wildfire risk in accordance with statutory requirements and regulatory guidelines. *Id.* at 12. The Company established procedural and personnel measures, including a Wildland Fire Preparedness and Prevention Plan that provided employees with guidance on preventing accidental ignitions during field work under heightened wildfire risk conditions. *Id.* at 13. The plan addressed required equipment, situational awareness practices, reporting protocols, and employee training requirements. *Id.* at 13-14. The Company also conducted pilot projects to evaluate technologies and mitigation approaches, including standby helicopter inspections, fuels-reduction partnerships, line-monitoring technology, covered conductor applications, three-dimensional pole loading analysis, high-impedance relay protection, and drone inspections supported by regulatory waivers. *Id.* at 14.

Public communication and outreach were also included in the Company's wildfire mitigation strategy. *Id.* at 15. The Company conducted annual education campaigns and outreach initiatives before, during, and after wildfire season to inform customers about wildfire risk, outage

preparedness, and Public Safety Power Shutoff (“PSPS”) procedures. *Id.* at 16. Communication channels included social media, news media, customer newsletters, printed materials, phone calls, text messages, and email notifications. *Id.* The Company also hosted public meetings and collaborated with community organizations and government agencies at the federal, tribal, state, and local levels to coordinate wildfire preparedness, share mitigation information, and gather feedback to inform future WMP updates. *Id.* at 16-17.

The Company believed that its wildfire mitigation strategy incorporated financially prudent and reasonably practicable line design methods for new, planned, and existing transmission and distribution infrastructure to reduce wildfire risk. *Id.* The Company applied a cost-benefit approach when evaluating mitigation measures, seeking to balance mitigation costs with the expected reduction in wildfire risk. *Id.* at 17-18. Design and system hardening efforts included line rebuilding, installation of covered conductors, strategic undergrounding of power lines, replacement of hardware and equipment with more fire-resistant materials, and the deployment of automatic reclosers and remote-controlled devices that enabled remote operations. *Id.* at 18. These improvements were intended to reduce wildfire ignition potential and also to provide additional benefits such as enhanced system safety, reliability, and resiliency. *Id.* When assessing construction, rebuilding, or upgrade projects, the Company employed a risk-based evaluation process in which the Company analyzed whether each project achieved an appropriate balance between mitigation costs and wildfire risk reduction as required under applicable statutory standards. *Id.*

The Company’s WMP described how design methods for new lines and planned upgrades were selected to reduce ignition risk in areas of heightened wildfire exposure. *Id.* The Company evaluated multiple mitigation options, including overhead system hardening and strategic undergrounding, and selected the approach that most effectively balanced cost and risk reduction. *Id.* at 19. While undergrounding overhead distribution lines could reduce wildfire ignition risk, improve reliability, and decrease long-term vegetation management needs, such projects typically required extensive planning and higher upfront costs. *Id.* In contrast, overhead hardening could often be implemented more quickly and at lower initial cost while benefiting a larger number of circuit miles and customers. *Id.* Accordingly, the Company assessed overhead-to-underground

conversions using established criteria to ensure that such projects were justified by the associated wildfire risk reduction and other operational benefits. *Id.*

The Company also relied on enhanced situational awareness tools to support wildfire mitigation and operational decision-making. *Id.* at 20. The Company utilized fire weather stations, wildfire detection cameras, and an internally developed Fire Potential Index (“FPI”) that converted environmental, meteorological, and fuel-related data into a numeric forecast of short-term wildfire potential across its wildfire risk zones. *Id.* The FPI generated daily forecasts during wildfire season, categorizing fire potential into green, yellow, or red levels to indicate the likelihood that a large wildfire could develop and spread. *Id.* These forecasts supported proactive operational planning and preparedness activities. *Id.*

Beginning in late 2024, the Company integrated advanced wildfire risk modeling software to support wildfire spread prediction, scenario analysis, and risk forecasting. *Id.* at 21. This cloud-based platform provided additional analytical capabilities that complemented the Company’s existing forecasting tools and supported operational decisions intended to reduce wildfire threats and risks. *Id.*

Asset management practices, including inspections and maintenance programs, represented another key component of the Company’s wildfire mitigation strategy. *Id.* at 22. The Company implemented a comprehensive set of inspection initiatives and established annual performance targets to support safe and reliable grid operations while reducing wildfire risk. *Id.*

During periods of elevated wildfire risk, the Company implemented operational measures designed to reduce the likelihood of ignition events. *Id.* at 24. These measures included temporary operating procedures for distribution and transmission systems during wildfire season, emergency de-energization strategies, and the potential implementation of PSPS during extreme weather conditions. *Id.* The Company’s distribution system protection strategy utilized Enhanced Protection Settings (“EPS”), which enabled more sensitive fault detection on distribution circuits located in higher wildfire risk zones. *Id.* Although these settings reduced the probability of ignition during fault events, they also increased the likelihood of customer outages; therefore, the Company activated EPS only when defined risk conditions were met. *Id.* at 25. Transmission system operating procedures were also modified during wildfire season to include additional inspection, patrol, and re-energization protocols for lines experiencing fault conditions. *Id.*

Through the Company's Vegetation Management Program, it conducted regular inspections of transmission and distribution corridors and cleared trees and vegetation that could contact energized equipment or damage facilities. *Id.* Enhanced vegetation management practices were implemented in higher wildfire risk zones, including additional patrols, mid-cycle pruning, identification of hazard trees, and targeted removal of vegetation posing imminent threats to infrastructure. *Id.* at 27. Annual audits of pruning activities were also conducted to confirm compliance with required clearance standards. *Id.*

Finally, the Company coordinated its wildfire mitigation planning with regulatory requirements and stakeholder engagement processes. *Id.* at 28. The Company filed its initial WMP with the Commission and subsequently submitted updated plans in later regulatory proceedings. *Id.* The 2026 WMP incorporated directives issued in prior Commission orders while also addressing statutory requirements established under applicable wildfire safety legislation. *Id.* at 28-29.

STAFF COMMENTS

Commission Staff ("Staff") reviewed the Company's 2026 WMP for compliance with the requirements of *Idaho Code* § 61-1804(1)-(2), the WSCA, *Idaho Code* § 61-1803, and the Commission's WMP Guidelines. Staff Comments at 2. Based on its review, Staff believed that the Company's 2026 WMP satisfied the applicable statutory and regulatory requirements and recommended that the Commission approve the Company's 2026 WMP with certain recommendations intended to improve future filings. *Id.* Specifically, Staff recommended that the Commission: (1) approve the 2026 WMP incorporating Staff's recommendations; (2) permit the Company to file updated WMPs on or about October 1st of each year; (3) require the Company to attach copies of its quarterly North American Electric Reliability Corporation ("NERC") FAC-003-X reports to future WMP filings; and (4) require the Company to include copies of current transmission maintenance and inspection plans used for compliance with NERC FAC-501-WECC-X, along with any violations identified in the most recent NERC compliance audit. *Id.*

Staff addressed the Company's request for clarification regarding the relationship between recently adopted WMP requirements and directives contained in prior Commission orders. *Id.* at 2-3. Although the Commission had previously approved a five-year WMP planning horizon for the Company, a more recent order established a minimum three-year planning horizon for WMPs.

Id. at 3. Staff recommended that the Company should comply with the Commission’s most recent directives concerning the planning horizon for its WMP. *Id.* Staff recommended that the Company continue separating internal wildfire mitigation labor within cost forecasts, continue exploring cost-effective methods of communication and education related to wildfire preparedness and PSPS programs, and continue identifying and describing funding alternatives and sources pursued to support wildfire mitigation activities. *Id.* at 3-4. Staff explained that these practices would improve transparency, allow tracking of labor costs over time, and assist the Commission in evaluating potential cost impacts on ratepayers. *Id.* at 4.

The Company forecasted approximately \$32.9 million in capital expenditures and \$53.5 million in operations and maintenance (“O&M”) expenses for 2026. *Id.* The largest capital investments were associated with the Overhead Primary Hardening Program and the Strategic Undergrounding Program, while the largest O&M expense related to the Company’s three-year vegetation management cycle. *Id.* Staff noted that the Company’s five-year capital forecast increased significantly compared to the prior year’s WMP, primarily due to expanded strategic undergrounding and overhead hardening investments, while the overall O&M forecast decreased due to program changes and operational adjustments. *Id.* at 4-5.

Staff evaluated the Company’s wildfire risk assessment methodology and believed that the Company employed sound quantitative and qualitative modeling techniques to identify wildfire risk zones and assess wildfire exposure. *Id.* at 5. The methodology incorporated multiple data sources, including weather modeling, fuel characteristics, and structural density data, and applied Monte Carlo fire spread simulations to estimate wildfire risk. *Id.* Staff identified several strengths in the Company’s approach, including the use of a conventional risk calculation framework, diverse technical inputs, proximity-based ignition sampling near transmission and distribution lines, and the use of a data-driven classification method to establish wildfire risk zone tiers that were further refined using qualitative local information. *Id.* at 6. Staff also noted that the Company planned to update its wildfire risk maps annually to reflect changing conditions. *Id.* at 5.

Although Staff found the overall methodology reasonable, it identified several areas for improvement in future WMPs. *Id.* at 7. These included incorporating asset-condition data and failure modes into ignition probability models, providing quantitative validation metrics for wildfire modeling results, evaluating potential forward-looking climate and environmental

scenarios, addressing whether additional infrastructure such as generation facilities or battery energy storage systems should be incorporated into risk modeling, and considering methods to account for potential loss of life as a risk consequence parameter. *Id.* at 7-8. Staff recommended that the Company address these areas in future WMP filings to enhance transparency and modeling accuracy. *Id.* at 7.

Staff also reviewed the Company's preventative programs and believed that the Company satisfied the requirements of *Idaho Code* § 61-1803(3)(b). *Id.* at 8. The WMP included programs related to situational awareness, infrastructure inspections, enhanced vegetation management in wildfire risk zones, operational practices during elevated wildfire risk conditions, workforce preparedness, and public education initiatives. *Id.* The Company also described several pilot programs designed to evaluate new mitigation technologies and operational approaches. *Id.* at 9. Staff recommended that future WMPs include additional detail regarding pilot program metrics, estimated duration, and annual costs, as well as a description of the Company's internal vegetation management crew pilot program. *Id.*

Staff believed that the Company adequately addressed the WSCA requirements related to public outreach and community education, including efforts to inform customers about wildfire risk and mitigation activities through meetings, public communications, and employee training. *Id.* at 9-10. Staff also believed that the Company had satisfied the WSCA requirements related to coordination with federal, state, tribal, and local agencies involved in wildfire preparedness and response. *Id.* at 10. However, Staff recommended that future WMPs provide additional information describing fuel reduction collaboration projects, including their locations, participating entities, and estimated costs. *Id.*

With respect to line design and system hardening, Staff believed that the Company's overall approach was reasonable and appropriately prioritized investments based on wildfire risk zone tiers. *Id.* at 10-11. The Company's mitigation strategies included overhead system hardening, underground conversion of distribution lines, installation of covered conductors, use of fire-resistant poles and crossarms, and targeted transmission line rebuilds. *Id.* at 11. Staff noted, however, that additional reporting would improve transparency and facilitate regulatory review. *Id.* Staff recommended that future WMPs include quantitative targets and effectiveness metrics for grid hardening programs, as well as a comprehensive table of transmission and distribution

projects that identified project drivers, design standards, costs, timelines, and the role of wildfire mitigation in project prioritization and design. *Id.* at 12.

Staff also reviewed the Company's situational awareness and wildfire monitoring programs and believed that they satisfied the WSCA requirements. *Id.* at 13. These programs included the use of weather stations, wildfire detection cameras, and forecasting tools such as the Fire Potential Index to monitor wildfire risk conditions. *Id.* Staff recommended that the Company adopt industry best practices for configuration management, testing, and issue tracking for internally developed software tools that support wildfire risk forecasting and operational decision-making. *Id.*

Staff further noted that the Company's infrastructure inspection programs, operational protocols, and PSPS framework were reasonable and consistent with industry practices intended to reduce wildfire ignition risk while balancing customer impacts. *Id.* at 14. The Company maintained a structured inspection program that included aerial and ground inspections, thermal imaging, pole inspections, and pre-season inspections in higher wildfire risk zones. *Id.* Staff also believed that the Company's operational protocols for distribution and transmission systems during wildfire season, including enhanced protection settings and emergency de-energization procedures, were appropriate. *Id.* at 14-15.

Staff believed that the Company's vegetation management program remained a critical component of wildfire mitigation and met the WSCA requirements. *Id.* at 15. The program included regular inspection cycles, vegetation clearance activities, and enhanced vegetation management practices in higher wildfire risk zones. *Id.* However, Staff recommended that the Company include additional reporting in future WMP filings, including NERC vegetation management compliance reports and expanded metrics that track vegetation-related outages and faults across both transmission and distribution systems. *Id.* at 15-16. Staff explained that such reporting would allow improved monitoring of vegetation management effectiveness across wildfire risk zones. *Id.* at 16.

Staff evaluated the Company's cost-benefit analysis and believed that while the WMP included a portfolio-level assessment, additional project-level analysis would improve the Commission's ability to evaluate the prudence of individual wildfire mitigation investments. *Id.* at 17. Staff recommended that future WMPs include consistent project-level cost-benefit evaluations

and additional cost data for mitigation technologies to improve transparency and support regulatory review. *Id.* Staff emphasized that Commission approval of the WMP did not guarantee recovery of forecasted costs, which would instead be evaluated in future rate proceedings. *Id.*

Finally, Staff coordinated with IDL during its review process, as required by *Idaho Code* § 61-1804(3). *Id.* at 18. IDL raised several concerns related to risk model inputs, the Company's cost-benefit approach, vegetation management practices, and the description of fuel reduction projects outside of utility rights-of-way. *Id.* Staff agreed that these concerns were valid and supported IDL's recommendations for further clarification and improvement in future WMP filings. *Id.* at 18-19.

IDL COMMENTS

IDL stated that it had historically required county cooperators who developed and maintained County Wildfire Preparedness Plans to provide detailed descriptions of the modeling inputs used to produce their planning products. IDL Comments at 1. IDL maintained that applying a lesser standard to utilities would create a double standard and set a precedent that would not meaningfully advance wildfire mitigation efforts. *Id.* Accordingly, IDL requested that the Company provide additional narrative detail describing the data used to produce its risk model. *Id.* Regarding Section 3, which addressed cost-benefit analysis of mitigation efforts, IDL recommended including a discussion of diminishing returns to better inform investment decisions and identify points at which additional expenditures would provide little or no added value. *Id.*

To reduce workload, IDL recommended that this analysis occur at the practice or project level and noted that the section as written lacked clarity and should be further clarified. *Id.* at 2. If the Company was unable to discuss the economics of mitigation actions directly, IDL suggested that the Company instead address the economic value of the systems served and the impacts associated with disruptions in electric service. *Id.* In Section 9.2.3, while the Company discussed fair market value for industrial lands, IDL asserted that the concept should be extended at minimum to state endowment lands and, if feasible, to other large non-industrial private landowners. *Id.* IDL also suggested that any existing agreements and standard operating procedures governing these situations be highlighted to strengthen confidence in working relationships and the valuation of timbered lands. *Id.*

Finally, IDL noted that vegetation inspection qualifications were appropriately based on arboriculture standards but argued that these standards alone were insufficient for addressing wildfire-related risks. *Id.* While arboriculture standards addressed vegetation health and proper pruning or removal practices, they did not account for ignition potential or fire propagation. *Id.* IDL recommended that vegetation inspection standards incorporate wildland fire-specific expertise, including attention to factors such as ladder fuels that allow fire to spread from the ground into forest canopies, thereby increasing wildfire risk if not properly mitigated. *Id.*

PUBLIC COMMENTS

Six public comments were filed. Two of the comments were from individuals that are not in the Company's service territory. The first comment (AiDash, Inc.) supported the Company's WMP and encouraged the Commission to ensure the Company continuously improves its approach to wildfire mitigation, specifically using AiDash, Inc.'s technology. The second comment also supported the Company's WMP and recommended the Commission consider blockchain-based verification infrastructure, specifically, the commenter's own company, to "strengthen implementation accountability under SB 1183, the Wildfire Standard of Care Act."

Northwest Energy Coalition ("NWEK")

NWEC stated that its comments were informed by its experience reviewing wildfire mitigation plans and regulatory processes across the region. NWEC Comments at 1. NWEC commended the Company for producing a clear and comprehensive plan and for maintaining partnerships that support wildfire detection, coordination with public safety agencies, and community outreach efforts. *Id.*

NWEC encouraged the Company to expand public education and communication regarding EPS, noting that these unplanned outages may occur more frequently than PSPS and can create confusion, financial hardship, and safety risks for customers. *Id.* at 1-2. NWEC also emphasized that, following the passage of the WSCA, rigorous regulatory review and oversight of wildfire mitigation plans remained important to ensure utilities effectively implemented proposed activities, particularly given the significant costs that customers ultimately bear. *Id.* at 2.

Finally, NWEC stressed the importance of balancing infrastructure and modeling investments with programs that directly benefit communities, such as battery backup systems and home fire-hardening measures for vulnerable customers. *Id.* It encouraged a broader, forward-

looking approach to wildfire mitigation that considered cumulative community impacts and prioritized coordinated planning, community resilience, and long-term risk reduction as wildfire risks and wildland-urban interface areas continue to expand. *Id.*

The Idaho Emergency Management Association (“IEMA”)

IEMA submitted comments regarding the role of PSPS, which occur when electric utilities de-energize power lines during hazardous weather conditions to reduce wildfire risk and protect critical infrastructure. IEMA Comments at 1. IEMA expressed appreciation for the efforts of power providers to enhance community and responder safety, including initiatives that increase public awareness of wildfire risk zones and encourage personal preparedness, particularly for vulnerable populations with medical or mobility needs who may be more affected by power outages. *Id.*

IEMA noted that the 2026 wildfire season had the potential to be highly active in Idaho and emphasized the importance of coordinated planning for PSPS events. *Id.* In particular, the association highlighted the role of Community Resource Centers (“CRCs”), which utilities may establish to support customers affected by outages by providing basic services such as hydration, temporary shelter, device charging, and situational updates. *Id.* IEMA observed that supporting CRC operations during extended outages would require an all-of-community approach involving coordination among utilities, public safety agencies, and volunteer organizations to address resource needs and service gaps. *Id.*

At the same time, IEMA emphasized that local emergency management agencies often face logistical and capacity constraints, which may be intensified during extreme weather events and heightened wildfire conditions. *Id.* As a result, IEMA encouraged utilities and local emergency managers to engage in early and frequent communication to improve coordination and preparedness. *Id.* IEMA further recommended that mitigation and operational planning related to CRCs be informed by regionally driven, scenario-based planning discussions conducted prior to wildfire season. *Id.* at 1-2. Such planning efforts would help clarify resource requirements, establish roles and responsibilities, develop shared response strategies, and assess the feasibility of proposed actions. *Id.* at 2.

City of Boise City (“City of Boise” or “City”)

The City of Boise commented on the Company’s 2026 WMP, expressing appreciation for the opportunity to provide feedback and commending the Company for developing a

comprehensive and detailed plan that reflected the growing national trend of increased wildfire damages. City of Boise Comments at 1. The City also acknowledged the Company's ongoing collaboration with local governments and public safety partners to improve community resilience to wildfire risks. *Id.* In particular, the City recognized the addition of CRCs in the 2026 WMP as a response measure during PSPS events and agreed with the Company's emphasis on public awareness of wildfire risk zones and the importance of household preparedness, particularly for residents with medical or mobility needs. *Id.* at 1-2.

The City noted that extended PSPS-related outages could create significant operational and resource challenges for local communities, even when utilities and partner organizations provided support. *Id.* at 2. While the City of Boise welcomed the Company's willingness to assist through measures such as deploying response trailers with mobile power capacity, the City emphasized the importance of clearly understanding risk exposure, potential cascading infrastructure impacts, and the scale of shared resources required during emergency responses. *Id.* at 2-3. The City further stated that although local emergency management agencies play an important role in coordinating disaster response, assigning them sole responsibility for CRC operations could divert limited resources away from their statutory emergency management functions. *Id.* at 3.

Instead, the City recommended that local emergency management agencies could provide valuable coordination and advisory support rather than direct CRC operation. *Id.* Suggested areas of collaboration included identifying potential CRC locations, advising on site accessibility and suitability, sharing information about vulnerable populations and high-risk areas, coordinating communications, and participating in pre-season planning and post-event evaluations. *Id.* The City emphasized the need to clarify responsibilities for CRC funding, staffing, and operations before any policy assigning such duties to local governments was finalized, noting that utilities in other states typically fund and operate CRCs while coordinating with local agencies. *Id.* at 4.

To support effective planning, the City recommended that the Company conduct regional, discussion-based exercises prior to wildfire season to review plausible PSPS scenarios, clarify partner roles, and identify resource needs. *Id.* at 4. The City also expressed support for the Company's vegetation management strategy, noting that it was appropriate for the City of Boise's local fuel conditions, which are primarily sagebrush and grass, and commended the Company's efforts to maintain vegetation-free areas around wood poles. *Id.* at 4-5. Additionally, the City

acknowledged the Company's ongoing coordination with public safety partners and indicated interest in continuing collaboration to verify critical infrastructure locations and ensure accurate contact information for PSPS notifications. *Id.* at 5.

Finally, the City of Boise raised concerns regarding the removal of explicit climate change references that had appeared in the 2025 WMP. *Id.* The City noted that the earlier plan directly acknowledged climate change as a factor contributing to increased wildfire risk through warmer temperatures, reduced snowpack, and earlier snowmelt, while the 2026 WMP relied more generally on references to changing conditions and variability. *Id.* The City encouraged the Company to continue explicitly recognizing and modeling climate-related wildfire risks and associated mitigation costs to ensure that long-term planning accurately reflected evolving environmental conditions. *Id.* at 5-6.

COMPANY REPLY

The Company expressed appreciation for the thorough review conducted by Staff and their determination that the Company's 2026 WMP met the requirements of the WSCA and the Commission's WMP guidelines. Company Reply at 3. The Company indicated that it generally supported many of Staff's recommendations and provided clarifications or alternative approaches where appropriate. *Id.* at 3-4. The Company explained that certain requested reporting, such as submissions to the NERC, would not meaningfully inform wildfire mitigation analysis because NERC's periodic data submittals primarily report vegetation-related outages for reliability purposes and may contain no data in quarters when no such outages occur. *Id.* at 4. Similarly, the Company noted that audits conducted under standards administered by the Western Electricity Coordinating Council were designed to evaluate compliance with transmission reliability standards rather than wildfire mitigation and therefore would provide limited insight into wildfire risk trends. *Id.* at 5. Instead, the Company supported developing alternative metrics, such as annual counts of vegetation-related outages by wildfire risk zone, to better evaluate vegetation management performance and system trends. *Id.* The Company proposed meeting with Staff prior to its next WMP filing to coordinate on appropriate metrics and reporting approaches. *Id.*

The Company explained that its wildfire risk modeling had historically focused on overhead transmission and distribution assets because those assets were most likely to interact with wildland fire environments, whereas other facilities such as power plants and offices were

managed under separate safety and fire protection frameworks. *Id.* at 6. The Company stated that geographic wildfire risk zones were designed to reflect inherent landscape risk—considering fuels, topography, weather patterns, and community exposure—rather than the condition of specific utility assets, which could change frequently due to inspections or repairs. *Id.* at 7. Asset-condition information, the Company explained, was instead used to prioritize mitigation activities within identified high-risk areas. *Id.* Looking ahead, the Company planned to enhance its modeling capabilities through the implementation of the FireSight platform developed by Technosylva, which would allow simulation of wildfire behavior and potential community impacts to further refine its analysis of loss-of-life risk and wildfire consequences. *Id.* at 7-8.

In response to comments submitted by IDL, the Company acknowledged the importance of coordinating with local partners and indicated that future WMP filings would include additional descriptive information regarding modeling inputs. *Id.* at 14. The Company also addressed IDL’s recommendations regarding cost-benefit analysis, fair market value for timber removal, and vegetation inspection standards. *Id.* at 15. The Company stated that while it would continue to improve modeling related to ignition-risk reduction and mitigation effectiveness, the Commission had previously clarified that cost-benefit analysis under the WSCA did not require highly granular quantification of wildfire mitigation benefits. *Id.* The Company also argued that extending fair market value requirements for timber removal beyond those specified in statute would exceed the Commission’s jurisdiction. *Id.* at 15-16. Regarding vegetation management, the Company noted that its program followed established arboriculture standards designed to maintain reliability and safety near powerlines, while broader landscape-scale fuel reduction efforts were typically the responsibility of land management agencies. *Id.* at 16. Nevertheless, the Company highlighted its participation in collaborative fuel reduction projects with partners such as the U.S. Forest Service and the Bureau of Land Management to reduce wildfire hazards near critical infrastructure. *Id.* at 17.

The Company also addressed comments from community stakeholders, including the City of Boise, the IEMA, and the NVEC. *Id.* at 17-22. These stakeholders generally supported the WMP while recommending continued coordination with local agencies, improved planning for CRCs during PSPS events, enhanced public communication regarding Enhanced Protection Settings, and ongoing evaluation of wildfire risk factors such as climate variability. *Id.* The

Company affirmed its commitment to collaboration with emergency managers, local planning committees, and community-based organizations through annual meetings, preparedness exercises, and public outreach efforts. *Id.* The Company also noted that its wildfire risk modeling already incorporated a multi-year climatology capturing severe fire-weather conditions and that it would continue evaluating how climate variability may influence wildfire risk over time. *Id.* at 19.

COMMISSION FINDINGS AND DECISION

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

The Commission is required to review a utility's WMP to ensure it satisfies the minimum requirements of the WSCA. *Idaho Code* § 61-1804(1). In conducting its review, the Commission considers the protection of public health, safety, and welfare; the feasibility of the WMP and the cost of its implementation; and the extent to which the WMP minimizes wildfire risk and provides for an effective response to potential wildfire events. *Idaho Code* § 61-1804(1)(a)-(c).

2026 WMP

The Commission has reviewed the Company's WMP in accordance with the requirements of the WSCA, including *Idaho Code* §§ 61-1803 and 61-1804. Based on the record, we find that the Company's WMP satisfies the minimum statutory requirements set forth in *Idaho Code* § 61-1803(3)(a)-(g). Specifically, the Commission finds that the Company's WMP adequately addresses the required elements, including risk identification and assessment, mitigation strategies, community outreach, vegetation management, infrastructure inspection and maintenance, operational practices, emergency response protocols and coordination, and public communication measures.

The Commission further finds that the WMP is consistent with the public interest, taking into account the protection of public health, safety, and welfare, the feasibility of the proposed measures, and the anticipated costs of implementation. The WMP reflects a good-faith effort by

the Company to reduce wildfire risk and to prepare for effective response to potential wildfire events.

Accordingly, the Commission approves the Company's WMP as filed, subject to ongoing review and future updates as required by the WSCA and Commission order.

Additional Public and Party Comments

We commend the Company for its continued efforts and commitment to collaborating with emergency managers, local planning committees, and community-based organizations, including NWECA, IEMA, and the City of Boise. The Commission acknowledges the recommendations and comments provided by these entities and encourages ongoing coordination with local partners.

Numerous recommendations were made by Staff and IDL regarding the Company's WMP. The Commission recognizes that this is the first year of implementation under the WSCA and that the Company, Staff and interested parties are operating within an evolving regulatory framework. The Commission appreciates their efforts to advance wildfire mitigation planning and to help protect Idahoans as this process continues to be refined and improved over time.

The Commission further commends the Company, Staff, and IDL for their collaborative efforts in reviewing and strengthening the Company's WMP. The Commission encourages the Company to continue working closely with Staff and its partners in future planning cycles to further enhance and refine its wildfire mitigation efforts. This cooperative process is essential to ensuring continuous improvement and strengthening protections for Idaho's communities, infrastructure, and natural resources.

Staff Recommendations

Staff recommended that the Company continue to separately identify wildfire mitigation labor in its cost forecasts, further explore cost-reduction opportunities through enhanced communication and education regarding wildfire risk and PSPS, and provide detailed information on all funding alternatives and sources pursued within the WMP. The Company agreed with these recommendations. The Commission finds these recommendations to be reasonable and in the public interest.

Staff recommended that the Company identify the types of infrastructure excluded from its risk modeling and, where such infrastructure is not incorporated into the Company's models, provide an explanation for its exclusion. Staff further recommended that the Company incorporate

quantitative model validation and analysis into its geographic risk modeling and assessment, and provide the estimated cost, planned duration, and evaluation metrics for each pilot program. In addition, Staff advised the Company to include a description of its internal vegetation management crew in Section 10.2 of the WMP and to adopt and further develop industry best practices in configuration management, requirements management, test management, and issue and defect tracking for all custom models or software developed for the FPI tool, as well as other custom-developed models or applications that play a critical role in the Company's WMP.

Staff also recommended that the Company expand the description of resources available to call center agents during a PSPS event within Appendix B and identify average project costs, including installation costs for steel poles, fire mesh wraps, wildfire detection cameras, undergrounding, covered conductors, fiberglass cross-arms for wooden poles, and weather stations. Staff recommended that all metrics used in the WMP be included in their respective sections and presented in a format that enables tracking across versions of the WMP. The Company agreed with these recommendations, and the Commission finds them to be reasonable and in the public interest.

Staff recommended that the Company establish and publish annual mileage targets for all transmission and distribution ("T&D") hardening programs and projects by wildfire risk zone tier or feeder, along with modeled ignition risk reduction per mile for each category. Staff further recommended that the Company adopt an effectiveness scorecard for each grid hardening method—including, but not limited to, covered conductor, non-wooden poles, non-wooden crossarms, and undergrounding—based on industry guidance. The Company stated that recommendations related to cost-benefit analysis should be interpreted more broadly to require the development of modeling for ignition risk reduction and mitigation effectiveness, and that such modeling should be required to inform its WMP beginning with the 2028 plan. The Commission finds these recommendations, as modified, to be reasonable and in the public interest.

Staff also recommended that the Company include a table in the WMP identifying all T&D rebuild and grid hardening projects, including the project name, type, primary driver, location, design standards, anticipated timeline, and estimated costs, as well as an explanation of whether wildfire mitigation priorities affected any aspect of the project, such as design, cost, or schedule. The Company agreed to apply this recommendation only to T&D rebuild and grid hardening

projects undertaken as part of its wildfire mitigation strategy, rather than to all such projects across its system. The Commission finds these recommendations, as modified, to be reasonable and in the public interest.

Staff recommended that the Company conduct cost-benefit analyses on a project-by-project basis to demonstrate that each project reasonably balances costs with reductions in wildfire risk. The Company stated that it will continue advancing this effort in 2026 and will provide an update on its progress in the Company's 2027 WMP. The Commission finds these recommendations, as modified, to be reasonable and in the public interest. The Commission looks forward to reviewing the Company's progress in the 2027 WMP and expects completion of this effort by 2028, or, alternatively, a clear explanation as to why project-by-project analysis has not been completed.

Staff recommended that the Company include copies of its four most recent quarterly NERC FAC-003-X compliance reports as attachments in future WMPs; include copies of current transmission maintenance and inspection plans used for NERC FAC-501-WECC-X compliance, along with any violations identified in the most recent NERC compliance audit; identify ways to incorporate loss of life as a parameter in future wildfire risk assessments, or at a minimum include it as a qualitative factor in areas with higher probabilities of such outcomes; take necessary steps to integrate asset condition and inspection data, as well as failure modes, into ignition models as part of geographic risk modeling and assessment; and expand reporting in future WMPs to include both T&D assets not covered by NERC standards in order to provide a more comprehensive view of trends and effectiveness across the utility's entire system.

The Company agreed to work with Staff in advance of finalizing its next WMP to better understand Staff's objectives and to identify appropriate and workable methods for addressing these recommendations. The Commission finds that requiring the Company to include loss of life as a parameter in future wildfire risk assessments is unreasonable. However, the Commission finds it reasonable and in the public interest for Staff and the Company to work collaboratively to address Staff's remaining recommendations.

IDL Recommendations

IDL recommended that the Company provide additional descriptive narrative regarding the data used to develop its risk model, including a discussion of diminishing returns within its cost-

benefit analysis and the impact of electrical service disruptions when making mitigation decisions. The Company stated that it would include further detail on the modeling inputs used in its updated geographic risk analysis and will consider economic impact factors as part of developing a cost-benefit framework to inform future iterations of the Company's WMP. The Commission finds these recommendations to be reasonable and in the public interest.

Prior Order

The Commission finds that the Company's WMP complies with the requirements and directives set forth in Order Nos. 36774, 36742, 36042, and 35717. We further clarify that the Company shall adhere to the most recent WMP requirements adopted in Order No. 36774, which govern the content and filing of future plans.

Consistent with Order No. 36774, the Commission confirms that the Company may file its updated WMP with the Commission on or about October 1st of each year going forward. This schedule is intended to provide a predictable and consistent framework for annual reviews and updates.


The Commission also emphasizes that all directives from prior Order Nos. 36742, 36042, and 35717, that are not superseded or otherwise addressed by the WSCA or Order No. 36774 remain in full force and effect. The Company is expected to continue complying with those requirements unless the Commission orders otherwise.

ORDER

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

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order regarding any matter decided in this Order. Within seven (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 14th day of April, 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary
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