

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN) CASE NO. PAC-E-25-22
POWER’S APPLICATION FOR APPROVAL)
OF THE 2026-2028 IDAHO WILDFIRE) ORDER NO. 37063
MITIGATION PLAN)
_____)

On December 19, 2025, Rocky Mountain Power, a division of PacifiCorp (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting that the Commission approve its 2026-2028 Idaho Wildfire Mitigation Plan (“WMP”), in accordance with *Idaho Code* § 61-1801, et seq., the Wildfire Standard of Care Act (“WSCA”), and the Commission Guidelines established in Order No. 36774 (Commission Guidelines”).

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. 36912. Intervention was granted to Ruveon, LLC, an affiliate of Bayer Corporation (“Bayer”). Order No. 36951.

On March 5, 2026, the Commission issued a Notice of Modified Procedure, establishing deadlines for public comments and Company reply comments. Order No. 36955.

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

The Legislature further acknowledged the Commission’s role in overseeing electric utility compliance with applicable statutes, regulations, and safety standards. *Id.* In adopting the WSCA,

the Legislature emphasized that utilities should proactively identify, mitigate, and respond to wildfire risk in a manner that protects public safety and property while also ensuring that utility expenditures remain prudent and rates remain affordable for customers. *Id.*

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

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

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

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

THE APPLICATION

The Company stated that its WMP was developed to comply with *Idaho Code* § 61-1803(3), the Commission Guidelines, and the directives established in Order No. 36405. Application at 2. The WMP described the strategies, practices, and mitigation measures the Company intends to use to address wildfire risk while balancing mitigation costs against reductions

in wildfire risk exposure. *Id.* The Company explained that its risk-informed cost-and-benefit framework guided the selection and prioritization of mitigation activities designed to meaningfully reduce wildfire risk. *Id.* Appendix A of the WMP detailed the Company's compliance with applicable Commission orders and the requirements of the WSCA and demonstrated how the WMP satisfied statutory and regulatory requirements. *Id.*

The Company acknowledged that wildfire risk had historically existed throughout its service territory, including Idaho, and recognized that such risk was inherent to operating an electric utility in the western United States. *Id.* at 3. The Company noted that the frequency, severity, and costs of catastrophic wildfires had increased significantly across the region, prompting utilities to place greater emphasis on wildfire mitigation. *Id.* The Company stated that it remained committed to long-term investments intended to reduce wildfire risk and described efforts to construct, maintain, and operate electrical infrastructure in a manner designed to minimize wildfire ignition potential. *Id.*

The Company's baseline risk analysis framework consisted of data collection and analysis, risk evaluation, risk treatment, and risk monitoring and review. *Id.* The Company reviewed fire history, causes, acreage impacts, and seasonal occurrence patterns to identify and prioritize wildfire risks. *Id.* Annual wildfire risk assessments incorporated models using vegetation, weather, topography, historical fire occurrence, and asset location data. *Id.* Risk maps identified areas with elevated wildfire risk and are reviewed annually to determine whether updates or changes in mitigation priorities were necessary. *Id.*

The Company implemented a variety of preventative programs, including inspection and correction activities, vegetation management, situational awareness technologies, and operational restrictions during periods of elevated wildfire risk. *Id.* at 4. Routine inspections and supplemental visual patrols are conducted ahead of high-risk conditions, while areas designated as Fire High Consequence Areas ("FHCAs") are subject to enhanced inspection requirements. *Id.* Although the Company's risk models had not identified any Idaho geographic areas for FHCA designation at the time of filing, the Company stated that it would continue evaluating Idaho service territory conditions for potential future inclusion. *Id.*

Vegetation management efforts were intended to reduce the likelihood of vegetation contacting power lines and causing ignitions. *Id.* The Company maintained both regular cycle

maintenance and enhanced vegetation management programs. *Id.* Regular cycle maintenance included tri-annual inspections, vegetation pruning, and removal of dead or hazardous trees near electrical facilities. *Id.* Enhanced vegetation management involved annual off-cycle inspections within FHCA territories and could also be applied in Idaho even in the absence of a formally designated FHCA. *Id.* The Company also shortened vegetation management cycles in wildfire-prone areas, implemented risk tree programs, and tracked measurable targets such as miles cleared and hazardous trees removed. *Id.*

The WMP described operational adjustments designed to reduce wildfire risk, including modified relay settings, altered re-energization protocols, enhanced safety settings, additional patrols during elevated risk periods, and deployment of fault indicators to expedite restoration activities. *Id.* at 5. The Company recognized that such measures could increase outage frequency and duration but stated that it continually evaluated these strategies to balance wildfire mitigation objectives with customer reliability needs. *Id.*

System strengthening initiatives included pole replacements, conductor upgrades, undergrounding projects, and retrofitting or replacing legacy equipment where cost-effective. *Id.* These efforts were intended to improve system resilience and reduce the likelihood that electrical infrastructure would create ignition sources during fault events. *Id.*

The Company also emphasized workforce training, pilot programs, and continuous improvement efforts. *Id.* Throughout the year, the Company defers nonessential work in high-risk areas, imposed operational restrictions based on weather conditions, equipped field personnel with firefighting tools and training, and deployed enhanced communication technologies such as Starlink satellite devices. *Id.*

The Company further described its Public Safety Power Shutoff (“PSPS”) Program, which authorizes proactive de-energization during periods of extreme wildfire risk. *Id.* at 6. The Company explained that PSPS events could be initiated based on factors such as high winds, low humidity, and dry fuel conditions and were intended to supplement other wildfire mitigation measures. *Id.* The Company’s WMP detailed PSPS decision-making processes, coordination with public safety partners, customer notification procedures, support for critical facilities, and re-energization protocols. *Id.*

The Company outlined a coordination and outreach strategy involving public safety agencies, emergency managers, the Forest Service, the Bureau of Land Management, and local stakeholders. *Id.* at 6-7. Activities included workshops, tabletop exercises, Community Resource Center demonstrations, functional exercises, and collaborative mitigation planning. *Id.* Customer outreach efforts included public service announcements, educational materials, and notifications delivered through mail, email, text messaging, and web platforms. *Id.* at 6. The Company stated that it maintained proactive communication before, during, and after wildfire season and ensured that vulnerable populations and critical infrastructure received advance notice during PSPS events. *Id.*

The Company also described its situational awareness capabilities, including real-time simulations, advanced weather forecasting, wildfire modeling, and daily operational assessments. *Id.* at 7. The Company's meteorology department uses advanced numerical weather prediction models to forecast weather-related impacts to the electrical system. *Id.* Coordination with neighboring utilities and regional partners facilitated awareness of broader wildfire and de-energization conditions throughout the region. *Id.*

Inspection and correction programs covered transmission, distribution, and substation assets located in elevated wildfire risk zones. *Id.* at 8. The Company established standards and schedules for inspections and classified defects according to priority levels for correction. *Id.* Numerous policies, procedures, and standard operating practices governing inspections, vegetation management, de-energization, and wildfire operations were identified in Appendix C of the WMP. *Id.* at 8-9.

Finally, the Company provided cost forecasts for wildfire mitigation investments and operations and maintenance ("O&M") expenditures through 2028. *Id.* at 10. The WMP projected approximately \$13.9 million in additional investments, including \$8.1 million in capital expenditures, to implement the mitigation activities described in the WMP. *Id.*

STAFF COMMENTS

Staff reviewed the Company's WMP pursuant to *Idaho Code* § 61-1804 and believed that the plan complied with the requirements of the WSCA, Commission Order No. 36405, and the Commission Guidelines. Staff Comments at 1-2. Staff evaluated whether the WMP protected public health, safety, and welfare; whether the proposed mitigation measures and associated

expenditures were feasible; and whether the plan adequately minimized wildfire risk and addressed wildfire response capabilities. *Id.* at 2. Staff believed that the Company had satisfied the required WMP components, including geographical risk assessments, preventative actions and programs, public outreach and government coordination, methods of line design, situational awareness and monitoring, infrastructure inspection and maintenance, de-energization practices, vegetation management, lessons learned, cost forecasts, and compliance with Commission directives. *Id.* Accordingly, Staff recommended that the Commission approve the Company's WMP and require the Company to continue filing updated WMPs annually on or about December 1 of each year. *Id.* Although Staff found the WMP compliant overall, it also identified numerous areas where future filings could include additional information, greater transparency, and more measurable performance metrics. *Id.*

Staff's review focused on the feasibility and cost effectiveness of the Company's wildfire mitigation activities. *Id.* at 3. Staff observed that the Company's WMP filing only provided incremental wildfire mitigation costs for 2026 through 2028 and omitted comprehensive baseline budget information as well as vegetation management forecasts. *Id.* Although the Company later supplied supplemental program-level cost information through discovery responses, Staff recommended that future WMP filings include complete capital and O&M forecasts broken down by individual programs and categories, with wildfire-related costs separately identified whenever possible. *Id.* Staff noted that the Company forecast approximately \$13.7 million in incremental wildfire mitigation investments between 2026 and 2028, consisting of approximately \$8 million in capital expenditures and \$5.7 million in O&M expenses. *Id.* at 6. This represented a decrease from the Company's 2024 WMP forecast of approximately \$31.4 million in total investments. *Id.* Staff explained that the reduction primarily resulted from lower projected spending on system hardening activities and operational work practices. *Id.*

Staff also reviewed the Company's wildfire mitigation labor forecasts and believed that, although the Company included a "Wildfire Mitigation Program Delivery" line item as required by prior Commission orders, the WMP itself did not identify any associated labor costs. *Id.* at 4. Supplemental discovery responses revealed approximately \$163,200 in Idaho-allocated internal labor costs. *Id.* Staff therefore recommended that the Commission continue requiring separate

labor cost reporting in future WMPs to allow comparisons across Idaho's investor-owned utilities and to track changes in labor expenditures over time. *Id.*

In evaluating the Company's cost-benefit analysis efforts, Staff believed that the Company generally complied with prior Commission directives requiring analyses of wildfire mitigation alternatives. *Id.* However, Staff expressed concern that the Company had not provided actual project-level analyses for Idaho because the Company identified no FHCAs within its Idaho service territory. *Id.* The Company stated that system hardening investments were prioritized only within FHCAs and therefore did not perform detailed alternative analyses for Idaho projects. *Id.* Staff disagreed with this interpretation and recommended that projects such as conductor upgrades, relay replacements, weather station installations, and other mitigation investments within Idaho Areas of Interest ("AOIs") should also be evaluated through formal cost-benefit analyses. *Id.* at 4-5. Staff additionally recommended that future WMPs include estimated costs for mitigation alternatives such as non-wooden poles, undergrounding, and covered conductors in to allow the Commission to better evaluate the relative effectiveness and reasonableness of proposed wildfire mitigation strategies. *Id.* at 5. Staff also noted that the Company was developing a "Risk Spend Efficiency" evaluation tool intended to improve future cost-benefit analysis efforts. *Id.*

Staff reviewed the Company's use of grants and alternative funding sources and believed that this information should be more prominently included within future WMPs. *Id.* Through discovery responses, the Company disclosed that it had received a \$650,000 Idaho State Energy Resiliency Grant for a Madison County project and a separate \$50 million award from the U.S. Department of Energy to support advanced network technology and fault circuit indicators. *Id.* The Company also disclosed that it had unsuccessfully applied for an additional grant through the Office of Energy and Mineral Resources. *Id.* Staff recommended that future WMPs identify all pursued funding opportunities, grant awards, and associated project details because such funding could reduce wildfire mitigation costs borne by ratepayers and assist the Commission in evaluating the feasibility of planned mitigation activities. *Id.* at 5-6.

Staff reviewed the Company's wildfire risk modeling methodology and believed that it generally reflected sound industry practices. *Id.* at 8. The Company utilized Technosylva's FireSight Wildfire Analyst Enterprise platform to evaluate wildfire risk through a framework that incorporated data collection, risk evaluation, risk treatment, and continuous monitoring. *Id.* The

model calculated wildfire risk as the product of ignition likelihood and consequence severity and used two primary metrics: Risk Association with Ignition Location and Risk Association with Value Exposure. *Id.* at 8-9. These metrics incorporated variables such as fire spread potential, terrain, fuels, structures at risk, and community impacts to produce composite risk scores across one-mile by one-mile grid cells. *Id.* at 9. Based on those scores, the Company categorized wildfire risk areas into FHCAs, AOI I, and AOI II. *Id.* Staff noted that the Company identified no FHCAs in Idaho and therefore relied primarily on operational controls and situational awareness rather than extensive infrastructure hardening. *Id.*

Although Staff found the overall modeling framework reasonable, it identified six major areas for improvement. *Id.* at 9-10. First, Staff observed that the Company excluded generation facilities, battery energy storage systems, and other non-line assets from wildfire ignition modeling despite the potential fire risks associated with those facilities. *Id.* at 11. Second, Staff noted that the Company did not use Company-specific ignition data because the data remained under review and validation; instead, the Company relied on generalized ignition probability proxies. *Id.* Staff warned that this approach could either understate or overstate actual ignition risk. *Id.* Third, Staff expressed concern that the model failed to establish a direct statistical relationship between probability of failure and probability of ignition, potentially biasing overall risk calculations. *Id.* Fourth, Staff questioned the adequacy of the Company's one-mile grid resolution because larger grid sizes could obscure smaller wildfire "hot spots" and reduce modeling precision compared to other Idaho utilities that used significantly smaller grid cells. *Id.* at 12. Fifth, Staff observed that the Company's model did not separately quantify potential loss of life, wildlife impacts, ecosystem damage, or timber losses as distinct consequence categories. *Id.* Sixth, Staff criticized the absence of benchmarking against publicly available wildfire risk maps such as the U.S. Forest Service Wildfire Hazard Potential maps and FEMA's National Risk Index. *Id.* at 13. Staff recommended that future WMPs address each of these modeling concerns and provide additional transparency regarding validation efforts. *Id.* at 10.

Staff also reviewed the Company's workforce preparedness, pilot programs, public outreach efforts, and governmental coordination activities. *Id.* at 13-15. Staff believed that the Company met applicable outreach and preparedness requirements through employee training programs, webinars, public information campaigns, informational videos, social media

communications, billing inserts, and coordination with federal, state, tribal, and local agencies. *Id.* at 13. However, Staff recommended that future WMPs provide additional detail regarding training participation rates, training frequency, specific partner organizations, and cost-sharing arrangements. *Id.* at 13-14. Staff further noted that the Company operated several pilot programs outside Idaho, including fault detection sensors, Gridware line sensors, and drone inspections, and recommended that future WMPs include summaries of all pilot programs, estimated costs, durations, and performance metrics even if those programs were not currently deployed within Idaho. *Id.* at 14.

Staff reviewed the Company's methods of line design and system hardening and believed that the Company's overall approach is reasonable given the absence of FHCAs in Idaho. *Id.* at 15. The Company planned limited system-strengthening projects in Idaho, including breaker and relay replacements at substations in Rexburg, Ashton, and Shelley. *Id.* Staff recommended that future WMPs include measurable project goals, timelines, cost justifications, project selection criteria, and estimated wildfire risk reduction benefits associated with those upgrades. *Id.* at 15-16. Staff also addressed the Company's use of fire mesh pole wraps and recommended that future WMPs describe the Company's installation practices, estimated per-pole costs, and accounting treatment for those mitigation activities. *Id.* at 16.

In reviewing situational awareness and monitoring activities, Staff believed that the Company satisfied statutory and Commission requirements. *Id.* at 17. The Company forecast approximately \$1.9 million in capital expenditures and \$3.2 million in O&M expenses over the three-year WMP period for weather monitoring, fire detection, and operational awareness activities. *Id.* Staff believed the Company's use of weather forecasting systems, weather stations, and wildfire detection technologies is generally appropriate but recommended additional detail regarding publicly available weather data sources, installation targets for new weather stations, deployment plans for wildfire detection cameras, and metrics used to evaluate camera effectiveness. *Id.* Staff also encouraged the Company to provide more transparent cost-benefit analyses for future situational awareness investments. *Id.* at 18.

Staff's review of infrastructure inspection and maintenance practices similarly concluded that the Company generally complied with WSCA and Guideline requirements. *Id.* However, Staff recommended that future WMPs provide additional data concerning inspection deficiencies, repair

priorities, remediation timelines, and pending corrective work. *Id.* Staff also encouraged the Company to establish and describe formal quality assurance (“QA”) procedures for inspection programs similar to those already used for vegetation management activities. *Id.* at 18-19. Staff explained that improved QA processes would enhance accountability, safety, and system reliability in wildfire-prone areas. *Id.* at 19.

With respect to operational practices and PSPS procedures, Staff believed that the Company’s WMP generally satisfied applicable requirements but lacked sufficient detail regarding changes in workforce practices during elevated wildfire conditions. *Id.* at 19-20. Staff recommended that future WMPs include detailed tables describing operational restrictions, fire watch requirements, vehicle equipment requirements, and changes to field activities based on increasing fire risk levels. *Id.* at 20. Staff also noted that the Company had conducted a PSPS event in Utah during 2025 and encouraged the Company to continue refining its PSPS protocols using lessons learned from planned and executed events. *Id.* at 19-20.

Staff also reviewed the Company’s vegetation management practices and believed them to be generally compliant with statutory and guideline requirements. *Id.* at 20. The Company utilized vegetation management standards such as ANSI A300, National Electrical Safety Code requirements, and North American Electric Reliability Corporation standards. *Id.* However, Staff observed that these standards primarily addressed vegetation clearances and reliability rather than wildfire ignition and propagation risks, particularly “ladder fuels” that allow fires to spread vertically into tree canopies. *Id.* at 20. Staff therefore recommended that the Company consider incorporating wildfire-specific vegetation management qualifications and standards into future programs. *Id.* at 20-21. Staff also encouraged the Company to move beyond simple completion metrics, such as miles treated, and develop more outcome-based metrics tied to vegetation-related outages, faults, and ignitions. *Id.* at 21. Staff further recommended that future WMPs include measurable vegetation management targets and discuss any incremental vegetation management activities conducted within Idaho AOIs. *Id.*

Finally, Staff confirmed that the Company complied with all procedural requirements related to WMP notice, annual filing obligations, lessons learned, and coordination with the Idaho Department of Lands (“IDL”). *Id.* at 21-22. Staff documented multiple meetings between Staff, IDL, and the Company during early 2026 to discuss wildfire risk modeling, vegetation

management practices, and responses to Staff discovery requests. *Id.* at 22. Staff believed that the Company met the required three-year planning horizon and properly addressed Commission orders and Staff recommendations within its appendices and supplemental responses. *Id.* Overall, Staff believed that the Company's 2026 WMP satisfied the applicable statutory and regulatory requirements while also identifying numerous recommendations intended to improve the detail, transparency, consistency, and effectiveness of future wildfire mitigation plan filings. *Id.* at 22-23.

BAYER COMMENTS

Bayer stated that its comments were intentionally limited in scope and were submitted to acknowledge the statutory purpose of the WSCA wildfire mitigation planning process while preserving Bayer's rights to address cost recovery, allocation, and liability issues in future proceedings. Bayer Comments at 1. Bayer explained that the WSCA directed the Commission's review toward prospective mitigation measures and whether the proposed WMP satisfied *Idaho Code* § 61-1803 and the Commission Guidelines, including whether the WMP reasonably balanced mitigation costs with risk reduction and identified appropriate preventative actions. *Id.* Bayer emphasized that the proceeding did not adjudicate wildfire liability or determine the recoverability or allocation of wildfire-related costs among the multiple jurisdictions in which the Company operated. *Id.* Bayer noted that Commission approval of the WMP did not constitute a finding that any specific mitigation expenditure was prudent or recoverable from Idaho ratepayers, and that such issues would instead arise in future rate cases, cost recovery proceedings, or allocation dockets. *Id.* at 1-2.

Bayer explained that the Company operated as a division of PacifiCorp, which managed operations on an integrated multi-state basis, and that the WMP relied on systemwide tools, programs, and operational capabilities that were developed and implemented across PacifiCorp's broader service territory. *Id.* at 2. Bayer argued that the WMP appeared to assume traditional systemwide allocation methodologies for wildfire mitigation costs without adequately demonstrating Idaho-specific cost causation or providing transparent state-by-state comparisons of wildfire risks, mitigation activities, and expected costs. *Id.* Bayer further contended that wildfire mitigation spending and related costs could be influenced by differing legal standards and policy decisions in other jurisdictions, underscoring the need for greater transparency before assigning such costs to Idaho customers. *Id.*

Bayer also maintained that compliance with an approved WMP should not be conflated with a determination that wildfire mitigation expenditures were reasonable or appropriately allocated to Idaho ratepayers. *Id.* Bayer identified several unresolved issues related to cost allocation, including the absence of designated FHCA in Idaho, the lack of state-specific wildfire risk and cost comparisons, and concerns that some mitigation measures primarily addressed distribution-level public safety risks rather than transmission-level reliability. *Id.* at 2-3. Bayer further argued that the WMP did not sufficiently demonstrate least-cost or least-risk alternatives for major mitigation categories and lacked detailed state-by-state wildfire exposure metrics necessary to evaluate the reasonableness of allocating systemwide costs to Idaho customers. *Id.* at 3. Bayer also raised concerns regarding increased inspection frequencies, expanded vegetation clearance requirements, and new wildfire initiatives that could materially increase costs without adequately demonstrating Idaho-specific need or cost causation. *Id.*

Although Bayer acknowledged and appreciated the Company's efforts to develop the WMP and the Commission's oversight of wildfire mitigation planning under the WSCA, Bayer asserted that Idaho's comparatively lower wildfire exposure should result in demonstrable cost savings relative to other PacifiCorp states. *Id.* Bayer believed that the WMP lacked sufficient information to evaluate whether the wildfire mitigation program would be successful or whether its costs were reasonable. *Id.* Accordingly, Bayer argued that approval of the 2026–2028 WMP should be limited to mitigation planning and standard-of-care compliance and should not be interpreted as a determination regarding cost recovery, cost allocation, or liability for wildfire losses incurred in other jurisdictions. *Id.* Bayer therefore requested that any Commission order approving the WMP expressly preserve the parties' ability to challenge future wildfire-related cost recovery, jurisdictional cost allocation, and customer-class allocation issues in subsequent proceedings. *Id.* at 3-4.

IDAHO DEPARTMENT OF LANDS COMMENTS

IDL reviewed the Company's wildfire risk modeling and expressed several reservations regarding the process used to identify wildfire risk areas. IDL Comments at 1. IDL noted that the Company's modeling did not designate any FHCA in Idaho, which IDL stated was inconsistent with wildfire risk modeling conducted by IDL and other entities. *Id.* As a result, IDL requested

additional information regarding the modeling products and methodologies used to develop the wildfire risk maps. *Id.*

IDL also observed that the Company's cost breakdown categorized investments by program area but did not clearly explain how investment decisions were differentiated or prioritized. *Id.* IDL stated that, without a cost-benefit analysis of mitigation activities, it was difficult to assess the relative value of individual investments, and it encouraged the Company to evaluate the potential costs of taking no mitigation action to better illustrate the benefits of the proposed investments. *Id.* at 1-2.

IDL further commented that the WMP primarily addressed wildfire risk from an internal causation perspective, while external wildfires could also significantly affect system reliability. *Id.* at 2. IDL requested that the Company provide additional discussion regarding measures intended to reduce damage from external wildfire events affecting the system. *Id.* With respect to fair market value considerations, IDL acknowledged that the Company addressed the issue generally in Section 3 of the WMP but requested that the Company either reference any existing procedures for compensating marketable timber or, if no such procedures existed, develop a formal implementation project and standard operating procedure addressing compensation for timbered lands. *Id.* IDL stated that clearly defined standard operating procedures would strengthen stakeholder confidence regarding wildfire mitigation activities affecting timber resources. *Id.*

IDL also raised concerns regarding vegetation inspection standards contained in the WMP. *Id.* Although IDL acknowledged that the qualifications relied on established arboriculture standards, it argued that those standards did not adequately address wildfire-specific concerns such as ignition potential and fire propagation. *Id.* IDL specifically referenced the importance of addressing "ladder fuels," which can allow fires to spread rapidly from the ground into forest canopies, thereby increasing wildfire severity. *Id.* IDL recommended that vegetation inspection qualification standards also include certifications specific to wildland fire mitigation. *Id.* In addition, IDL encouraged the Company to participate in Idaho county wildfire planning groups, noting that every Idaho county had completed a County Wildfire Preparedness Plan and that greater coordination could improve resource sharing, wildfire mitigation planning, and public education efforts. *Id.* at 2-3.

COMPANY REPLY

In its Reply Comments, the Company stated that its WMP built upon recent operational experience and stakeholder engagement efforts and focused on improving situational awareness, operational readiness, and system performance to reduce ignition risk and limit the consequences of wildfire-related fault events. Company Reply Comments at 2. The Company explained that during 2025 it expanded weather monitoring capabilities, enhanced wildfire risk modeling, implemented modified operating practices, launched the Wildfire Intelligence Center, and strengthened coordination with public safety partners. *Id.* The Company also forecasted approximately \$13.9 million in additional Idaho-specific wildfire mitigation investments through 2028. *Id.* Although no FHCA had been identified in Idaho, the Company maintained that the WMP reflected ongoing risk evaluation and statewide mitigation efforts tailored to Idaho's wildfire risk profile. *Id.*

The Company responded to Staff's comments and recommendations. *Id.* The Company noted that Staff believed the WMP satisfied the requirements of the WSCA, prior Commission orders and applicable guidelines, and recommended Commission approval of the WMP with annual filing updates. *Id.* In response to Staff's concerns regarding AOI, the Company stated that it was updating its wildfire risk mapping methodology to transition away from AOIs and establish new FHCA boundaries in Idaho. *Id.* at 2-3. The Company further agreed with Staff's recommendation to develop a transparent and repeatable cost-benefit methodology and explained that it was creating a monetized cost-benefit analysis framework that would evaluate wildfire mitigation investments using assumptions regarding the economic impacts of wildfire damage, including impacts to life, property, and acres burned. *Id.* at 3.

The Company also addressed Staff's recommendations regarding transparency, metrics, and future reporting requirements. *Id.* at 4. The Company agreed to include additional metrics, measurable targets, training information, pilot program details, weather station plans, camera network information, vegetation management metrics, infrastructure deficiency tracking, quality assurance processes, and workforce safety practice descriptions in future WMP filings where data were available. *Id.* at 4-6. The Company stated that it would continue refining PSPS procedures through exercises and operational experience and would evaluate industry wildfire-specific vegetation management qualifications. *Id.* at 7. While the Company acknowledged Staff's

recommendations for increased detail and reporting, it explained that some metrics and mitigation programs were still evolving and therefore lacked sufficient historical data for meaningful trend analysis. *Id.* at 7-8.

The Company also responded to IDL's concerns regarding wildfire risk modeling. *Id.* at 9. The Company explained that its modeling used Technosylva's FireSight platform to evaluate wildfire risk at the transmission and distribution line segment level by analyzing probability of fault, probability of ignition, and wildfire consequences. *Id.* at 9-10. The Company described ongoing improvements to grid resolution, risk validation processes, and cost-benefit analyses, including the incorporation of publicly available wildfire datasets and monetized assessments of loss-of-life impacts. *Id.* at 10-11. The Company also acknowledged that while it has not identified wildfire risk areas in the State of Idaho or completed a comparative analysis using public risk maps, the Company was currently updating its methodology for identifying high risk areas. *Id.* at 9.

The Company addressed concerns regarding wildfire risk mapping, vegetation management, cost-benefit analysis, timber compensation procedures, and coordination with local wildfire planning groups. *Id.* at 11-13. The Company stated that it was updating its risk mapping methodology to incorporate publicly available wildfire hazard data and to benchmark future wildfire risk maps against other available datasets. *Id.* at 11. The Company also explained that its wildfire mitigation measures, including vegetation management, inspections, pole wrapping, and emergency de-energization procedures, were designed to address both utility-caused ignitions and external wildfire threats. *Id.* at 11-12. Additionally, the Company agreed to develop a formal procedure regarding compensation for marketable timber and stated that it would continue evaluating wildfire-specific vegetation management credentials and coordination with county wildfire preparedness planning groups. *Id.* at 12-13.

The Company also responded to Bayer's comments regarding cost recovery, allocation, and the legal significance of WMP approval. *Id.* at 13. Bayer had argued that approval of the WMP should be limited to mitigation planning and standard-of-care considerations and should not affect future determinations regarding prudence, cost recovery, or cost allocation. *Id.* The Company disagreed, asserting that approval of the WMP carried evidentiary value regarding whether future mitigation expenditures were reasonably and prudently incurred under the WSCA. *Id.* at 14. The

Company argued that the WSCA expressly required the Commission to consider the feasibility and cost reasonableness of wildfire mitigation plans and therefore WMP approval could properly inform future prudence evaluations, even though it did not predetermine future ratemaking outcomes. *Id.*

The Company further rejected Bayer's assertions regarding systemwide cost allocation and Idaho-specific mitigation costs. *Id.* at 15. The Company maintained that most wildfire mitigation costs were state-specific rather than systemwide and that Idaho's WMP did not include costs associated with mitigation work performed in other states. *Id.* at 15-16. The Company also disagreed with Bayer's arguments regarding the need for state-by-state wildfire comparisons and "least-cost, least-risk" analyses, asserting that such requirements were not mandated by statute or Commission order. *Id.* at 16. The Company emphasized that many wildfire mitigation efforts, including inspections, vegetation management, the Wildfire Intelligence Center, idle line mitigation, and emergency de-energization strategies, were appropriate and necessary even in the absence of designated FHCA areas in Idaho. *Id.* at 16-17. The Company believed that the WMP appropriately addressed wildfire risk in Idaho, satisfied statutory and regulatory requirements, and should be approved as filed without the limitations or disclaimers requested by Bayer. *Id.* at 17-18.

IDAHO DEPARTMENT OF LANDS SUPPLEMENTAL COMMENTS

IDL filed Supplemental Comments to encourage additional data inputs in future wildfire risk evaluations. IDL Supplemental Comments at 1. IDL encouraged the Company to include system components, vegetative height layer, and soil layer. *Id.* at 1-2. IDL also requested that the Company address wind events in the Company service territory when evaluating wildfire risk. *Id.* at 2.

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 2026 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 WMP adequately addresses wildfire risk identification and assessment, preventative and corrective mitigation measures, public outreach and governmental coordination, infrastructure inspection and maintenance, operational practices, vegetation management, situational awareness and monitoring, emergency response planning, and public communication protocols.

The Commission further finds that the WMP is consistent with the public interest when considering the protection of public health, safety, and welfare; the feasibility of the proposed mitigation measures; and the anticipated costs of implementation. The Company has demonstrated a continued commitment to evaluating and reducing wildfire risk through enhanced situational awareness, operational preparedness, vegetation management, infrastructure maintenance, and coordination with public safety partners. The Commission also recognizes that the Company forecasts approximately \$13.9 million in Idaho-specific wildfire mitigation investments through 2028 and has committed to continuing annual updates to its wildfire mitigation efforts.

Accordingly, the Commission approves the Company's 2026 WMP as filed, subject to ongoing review and future updates as required by the WSCA and Commission order.

Additional Public and Party Comments

The Commission appreciates the participation of Staff, IDL, Bayer, and the Company throughout this proceeding. The comments submitted by the parties contributed to a thorough review of the Company's WMP and identified opportunities to improve future wildfire mitigation planning efforts.

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

The Commission also appreciates IDL's continued participation and expertise regarding wildfire risk, vegetation management, and land management practices. We encourage the Company to continue coordinating with IDL, county wildfire preparedness planning groups, emergency management organizations, and other stakeholders as it refines future iterations of its WMP.

Staff Recommendations

Staff recommended that the Company continue to provide greater transparency regarding wildfire mitigation costs, including separate identification of wildfire-related labor expenditures and more detailed capital and operation and maintenance forecasts by program category. The Company agreed to continue improving its reporting and disclosure practices. The Commission finds these recommendations to be reasonable and in the public interest.

Staff recommended that future WMPs provide additional information regarding grants, alternative funding sources, and other opportunities to offset wildfire mitigation costs. The Company agreed to expand its reporting of grant applications, funding awards, and associated projects. The Commission finds these recommendations to be reasonable and in the public interest.

Staff also recommended that the Company further develop its cost-benefit analysis framework and apply that framework to wildfire mitigation investments undertaken within Idaho AOIs. The Company stated that it is developing a monetized cost-benefit methodology that will evaluate wildfire mitigation investments using assumptions related to wildfire impacts, including impacts to life, property, and acres burned. The Commission finds these recommendations to be

reasonable and in the public interest. We expect the Company to continue developing and refining this framework and to report on its progress in future WMP filings.

Staff identified several opportunities to improve the Company's wildfire risk modeling, including additional transparency regarding model inputs, validation processes, asset coverage, benchmarking against publicly available wildfire datasets, and incorporation of Company-specific operating experience. The Company indicated that it is updating its risk mapping methodology, improving model validation efforts, and incorporating additional publicly available wildfire hazard data. The Commission finds these recommendations to be reasonable and in the public interest and encourages the Company to continue refining its modeling processes and providing additional information regarding those efforts in future WMPs.

Staff further recommended that future WMPs include additional detail regarding workforce training, pilot programs, weather monitoring, wildfire detection technologies, infrastructure inspections, quality assurance procedures, operational practices, Public Safety Power Shutoff protocols, vegetation management activities, and measurable performance metrics. The Company generally agreed with these recommendations and committed to providing additional information where data is available. The Commission finds these recommendations to be reasonable and in the public interest. The Commission encourages the Company to continue developing meaningful performance measures that allow stakeholders to evaluate the effectiveness of wildfire mitigation activities over time.

IDL Recommendations

IDL recommended that the Company provide additional information regarding its wildfire risk modeling methodology and continue refining its identification of high wildfire risk areas. IDL also encouraged the Company to incorporate additional data inputs into future risk assessments and to benchmark its results against publicly available wildfire hazard datasets. The Company stated that it is updating its risk mapping methodology and intends to incorporate additional public wildfire hazard information into future analyses. The Commission finds these recommendations to be reasonable and in the public interest.

IDL further recommended that the Company continue developing its cost-benefit analysis framework, provide additional discussion regarding external wildfire threats to utility facilities, develop procedures addressing compensation for marketable timber where appropriate, evaluate

wildfire-specific vegetation management qualifications, and coordinate with county wildfire preparedness planning groups. The Company generally agreed with these recommendations and committed to evaluating or implementing these measures in future planning cycles. The Commission finds these recommendations to be reasonable and in the public interest.

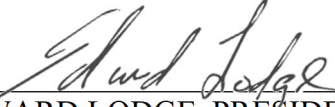
The Commission commends the Company, Staff, IDL, and participating stakeholders for their collaborative efforts throughout this proceeding. Wildfire mitigation planning remains an evolving process under the WSCA, and continuous improvement is essential to reducing wildfire risk and protecting Idaho communities, infrastructure, natural resources, and utility customers. The Commission encourages the Company to continue working closely with Staff, IDL, and other stakeholders as it develops future WMPs and implements wildfire mitigation measures throughout its Idaho service territory.

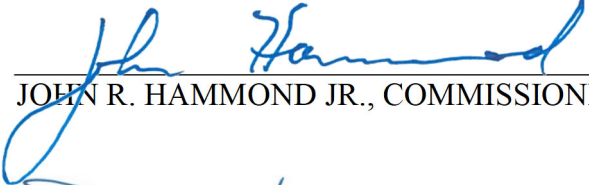
ORDER

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 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 9th 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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