

Tanner Electric Cooperative Wildfire Mitigation Plan

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1.0 Executive Summary

When the Washington Legislature passed House Bill 1032 in July 2023 it stated that, *it is in the best interest of the state, our citizens, and our natural resources to identify the sources of wildland fires; identify and implement best practices to reduce the prevalence and intensity of those wildland fires; put those practices in place; and by putting those practices in place, reduce the risk of wildland fires and damage and losses resulting from those fires.*

The Legislature directed the Department of Natural Resources (DNR), in consultation with the Energy Resilience and Emergency Management Office of the Department of Commerce, to contract with an independent consultant with experience in developing electric utility wildfire mitigation plans to develop an electric utility wildfire mitigation plan format and a list of elements to be included in electric utility wildfire mitigation plans. The Wildfire Mitigation Plan (WMP) format below achieves the direction of the Legislature.

The mission of Tanner Electric Cooperative (TEC) is to provide reliable, safe, sustainable, and affordable utility services to the communities we serve. TEC is dedicated to safe operations while striving to improve the quality of life of our member-owners and the local community. The Cooperative works aggressively and proactively to manage and mitigate wildfire risk while operating and maintaining its system. The outcome of this approach is diligent stewardship of customer/owner investment in the Cooperative as it continues to construct, maintain, and operate its electric distribution system in a manner that minimizes the risk of catastrophic wildfire posed by electrical lines and equipment. The Cooperative has applied careful consideration in developing broad strategies to mitigate utility posed wildfire risks. This Plan is a "living document" and will be reviewed and modified on an as-needed basis when regulations are updated, advances in technology occur, and operational circumstances change.

2.0 Wildfire Mitigation Plan Overview

2.1 - Purpose of the Wildfire Mitigation Plan

This Wildfire Mitigation Plan (WMP or Plan) describes TEC's measures to mitigate the threat of Cooperative equipment and procedure ignited wildfires.

The goals and activities included in the WMP focus on a comprehensive and integrated assessment of the risks posed by TEC's distribution system, including equipment, facilities, weather conditions, density and condition of potential fuels, and the potential threat to public safety. TEC's commitment to fire safety, prevention, mitigation, response, and recovery is a crucial element of our mission.

This Plan is subject to approval by the Cooperative's Board of Directors and implemented by the CEO.

2.2 - Where can the Wildfire Mitigation Plan be found

TEC's Wildfire Mitigation Plan can be found on the State of Washington's Wildfire Resources page along with all other utilities Wildfire Mitigation Plans.

3.0 Cooperative Overview

3.1 - Utility Description and Context Setting Table

Tanner Electric Co-op serves the communities of North Bend, Ames Lake, and Anderson Island.

Tanner Electric Facts:

- 5,093 meters
- 345 miles of line
- 18 employees
- Plant investment: \$33,148,642
- 2020 kWh sales: 92,856,863
- 2020 sales: \$12,583,634

Table 1. – Context-Setting Information Table

Utility Name	Tanner Electric Cooperative
Service Territory Size (Sq. Miles)	97.86 Sq. Miles
Service Territory Make-Up	Not Tracked – Data not made available for this Plan
Service Territory Wildland Urban Interface (based on total area)	100% Wildland Urban Interface
Members Served	5093 Meters
Account Demographics	70% Residential 30% Commercial/Industrial
Utility Equipment Make-up (circuit miles) *based on GIS data	Overhead Distribution: 75.19 Miles Overhead Transmission: 2.68 Miles Underground Distribution: 282.96 Miles
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	Yes
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	No

4.0 Objectives of the Wildfire Mitigation Plan

4.1 Minimizing Likelihood of Ignition

The primary goal of this Plan is to minimize the possibility that the Cooperative's facilities may be an original or contributing, however unlikely, source of ignition. The Cooperative has evaluated system improvements, operational procedures, and training that can help meet this objective. Further, the Cooperative continually updates best management practices to reflect its commitment to sensible system management and new opportunities to improve the Plan's efficacy.

4.2 Resiliency of the Electric Grid

Along with creating a WMP, the Cooperative realizes the opportunity to improve resiliency by hardening the system. The National Infrastructure Advisory Council defines system resiliency as the ability to reduce the magnitude and/or duration of disruptive events. As part of the ongoing development of this Plan, the Cooperative assesses new industry practices and technologies that may reduce the likelihood of a service disruption or improve the timeline for restoration of service.

5.0 Roles and Responsibilities

5.1 Utility Roles and Responsibilities

The Cooperative utilizes a Board/CEO governance and reporting hierarchy. Cooperative member-owners elect board members to rotating terms. The Board is responsible for adopting all policies and delegates the operational implementation of policy to the CEO.

The CEO has the operational authority of the Cooperative and reports directly to the Board. The CEO provides direction and management to all Cooperative staff while implementing Board adopted policy.

The Operations Manager and CFO/Office Manager serve as the Cooperative's public liaisons to outside agencies and respond to requests for information, including proactively providing public awareness outreach and emergency information.

The Operations Manager will assume the WMP operational authority of the CEO in the absence of the CEO. The Operations Manager oversees the daily electric utility operations, including construction, maintenance, energy control, fleet, vegetation management, and other ancillary daily duties.

All Cooperative staff have the following responsibilities regarding fire prevention, response, and investigation:

- Conduct work in a manner that will minimize potential fire dangers
- Take all reasonable and practicable actions to prevent fires resulting from the Cooperative's electric facilities
- Coordinate with Federal, State, and Local fire management personnel to ensure that appropriate preventative measures are in place
- Immediately report fires, according to specified procedures
- Take corrective action when observing or having been notified of fire protection measures that have been improperly installed or maintained
- Ensure that wildfire data is appropriately collected
- Maintain adequate training programs for all relevant employees

5.2 Coordination with Local Emergency Management and Incident Response

When requested by an emergency manager, the Cooperative will support the King County and Pierce County Emergency Management Center (EMC) operations. Support could include exchanging information, supplying resources, or staffing at the EMC.

Other local entities that TEC may work with are:

- King County Sheriff
- Pierce County Sheriff
- Snoqualmie Police Department
- Eastside Fire and Rescue
- Anderson Island Fire Department
- Sallal Water Association
- Ames Lake Water Association
- Riviera Water Association
- In addition, TEC will implement their Emergency Management Plan if needed. TEC also follows the FEMA Incident Command System when working with local organizations during crises.

6.0 Wildfire Risks

6.1 Identified Drivers of Wildfire Risk

Environmental risks present in TEC territory include extended draughts, high winds, steep terrain, and heavy vegetation. All of these risk factors contribute to an elevated risk of wildfire especially in the higher elevations of TEC's service territory.

7.0 Wildfire Preventative Strategies

7.1 Weather Monitoring

The Cooperative monitors current and forecasted weather data from a variety of sources, including:

- The National Oceanic and Atmospheric Administration (NOAA)
- United States National Weather Service (NWS)
- United States Forest Service Wildland Fire Assessment System
- National Fire Danger Rating System
- Internal knowledge of local conditions

Based on the relevant weather data and knowledge of local conditions, the daily conditions could fall into one of these categories.

- 1) Normal: No operational changes will occur during normal conditions.
- 2) Elevated: During elevated fire-risk conditions, Cooperative staff will perform routine work with an elevated level of observation for environmental factors that could lead to ignition.
- 3) Red Flag Warning: If the National Weather Service declares a Red Flag Warning (RFW) for any portion of the Cooperative's service territory, the Cooperative may delay all routine work on

overhead energized primary lines. The Cooperative may perform necessary work to preserve facilities or property. TEC will provide a one-hour fire watch when operating on public lands during an RFW. A one-hour fire watch is defined as an employee(s) or qualified worker who will stay on-site and monitor the worksite for fires or fire dangers.

7.2 Design and Construction Standards

The Cooperative has changed certain aspects of its line design to help mitigate the potential of its facilities contributing to a wildfire start. These are:

- Requiring new facilities to be built underground
- Changing out expulsion fuses to Current Limiting fuses (CLF) in certain areas

7.3 Fuel and Vegetation Management

TEC employs a vegetation management that attempts to minimize the risk that TEC facilities would be involved in igniting a fire.

TEC has a rotating, three-year cycle of tree trimming. Tree trimming is usually performed by contractors in the spring and TEC line crews when supplemental trimming is needed.

7.4 Workforce Training

TEC believes that an essential line of defense against the ignition of fires is a well-trained and alert workforce. Internally, TEC has created a culture of fire prevention. To that end, TEC is developing training programs designed to minimize the likelihood that TEC facilities or fieldwork would be the source of ignition for a fire.

The Cooperative requires its workforce to become familiar with the WMP. All field staff will be:

- Trained in the content of the WMP
- Trained in proper use and storage of fire extinguishers
- Trained in environmental conditions (current and forecasted weather that coincides with the duration of work for the day)

Generally, all planned PSPS events will go through a chain-of-command decision process. However, any trained TEC employee can conduct a PSPS with Management follow-up during an emergency or quickly developing situation. The training will also review member communications strategy with employees. Workforce training additionally will include obtaining feedback from employees for possible incorporation into the Plan.

7.5 Relay and Recloser Practices

During times of elevated fire risk (historically from mid-summer through late fall), TEC may disable the reclosing on lines that feed overhead distribution lines. Disabling reclosers can lengthen the duration and increase the number of outages because every outage will require that crews visually inspect the line during daylight hours before re-energization.

7.6 De-Energization / Public Safety Power Shutoff (PSPS)

TEC has the authority to shut off power during high fire-threat conditions preemptively. TEC may exercise this option after a case-by-case analysis based on any one or more of the following considerations:

- Red-Flag Warnings issued by the National Weather Service
- TEC staff assessments of local conditions
- Real-time information from staff located on-site

During an PSPS event, Tanner staff will continuously monitor relevant conditions. Operations will re-energize affected lines when industry established thresholds for re-energization are met. Lines shall be patrolled in daylight to visually verify that the lines are clear/safe to re-energize. Length of outages depends on multiple factors and cannot be determined before a specific PSPS event occurs. As experience with PSPS is gained, TEC expects the Plan to evolve, incorporating lessons learned to improve the process.

While all TEC members affected by an PSPS will experience the effects of loss of power, TEC is aware of vulnerable groups for whom a loss of power would be a more significant hardship or who live in an area where traditional communication channels are lacking. These groups include:

- Members reliant on medical devices
- Members who lack mobility
- Members in areas that do not have cell phone service
- Members in areas that do not have internet service

TEC will utilize the headquarters in North Bend as a resource center to assist these vulnerable members during a predicted PSPS. However, it is critical that members establish their own emergency plan for loss of power during an PSPS event.

7.7 Plan Updates

Achieving a robust, effective plan to mitigate wildfire risk is the primary objective of this document. Staff has the role of vetting current procedures and recommending changes or enhancements to build upon non-optimized strategies in the Plan. Unforeseen circumstances, regulatory changes, emerging technologies, or other rationales may expose deficiencies within the Plan. Those deficiencies will be reported to the CEO and rectified on an as-needed basis.

The Operations Manager, or their designee, will be responsible for spearheading discussions to address deficiencies when updating the Plan for its annual presentation to the CEO. All stakeholders are empowered to suggest improvement opportunities. These stakeholders may include, but are not limited to:

- Employees
- Management
- Auditors
- Fire safety professionals
- Emergency Management personnel
- Members of the public

8.0 Community Outreach and Public Awareness

TEC employs various methods of communicating with its members and the public. These forms of communications each have their use in terms of differing levels of immediacy and the amount of information one can supply. These forms of communications to the members may include:

- Ruralite articles
- Social Media
- TEC Website
- E-Mail
- Text messages (coming soon)
- TEC sponsored Member Forums
- Annual meetings
- King/Pierce County Emergency Management Systems

TEC will continue to post and supply informational materials on different platforms in an attempt to inform our Members of the effects of this mitigation plan as well as any possible PSPS.

9.0 Third Party Review

Brown and Kysar, Inc, an engineering services company with experience in preparing wildfire mitigation plans, assisted in developing this plan.