

 Valley Electric Association, Inc. A Touchstone Energy® Cooperative 	Operations Plan	Version No.	1.1 (updated 07/10/26)
		Effective Date	August 6, 2026
		Plan Owner	Aaron Lynn
WILDFIRE MITIGATION PLAN (WMP)		DISTRIBUTION RESTRICTION: NONE	

WILDFIRE MITIGATION PLAN (WMP) FILED PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE §8387

1. INTRODUCTION & STATUTORY AUTHORITY

This Wildfire Mitigation Plan (WMP) is prepared and filed in compliance with California Public Utilities Code §8387, which requires all local publicly owned electric utilities and electrical cooperatives to prepare, adopt, and update a wildfire mitigation plan every four years.

The purpose of this plan is to ensure that Valley Electric Association, Inc. (VEA) constructs, maintains, and operates its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfires.

VEA's presence in California represents a limited portion of its overall service territory, consisting of approximately:

- 48 Meters,
- 314 Distribution Poles,
- 19.9 Line Miles, and
- 126.9 Square Miles of Service Area.

Relative to larger California utilities, this footprint constitutes a small and geographically limited system, primarily located in rural and low-density areas. The California portion of VEA's system is served via a radial line configuration, which is dependent on upstream transmission infrastructure operated by Southern California Edison. As a result, during elevated wildfire risk conditions, upstream de-energization or Public Safety Power Shutoff (PSPS) events initiated by Southern California Edison may preemptively de-energize VEA's California service area, thereby further reducing potential ignition risk associated with VEA-operated facilities.

While VEA remains fully committed to compliance with § 8387 and the safe operation of its facilities, the scale and configuration of its California infrastructure reflect a comparatively minimal wildfire exposure profile. A summary of VEA's California service territory characteristics is provided in Appendix H.

2. ORGANIZATIONAL RESPONSIBILITIES

- 2.1** Plan Owner – Aaron Lynn, Director of Line Operations
- 2.2** Line Operations – Implements inspection, patrol, and vegetation management.
- 2.3** System Operations Center – Monitors weather, issues reclosing and de-energization orders.
- 2.4** Vegetation Management Team – Executes clearance cycles and contractor oversight.
- 2.5** Emergency Management Coordinator – Coordinates notifications and outage communications.
- 2.6** Legal & Regulatory Affairs – Ensures compliance with CPUC and Wildfire Safety Advisory Board requirements.

(PUC §8387(b)(2)(A))

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3. OBJECTIVES OF THE PLAN

- 3.1 Minimize the risk of utility-caused wildfires.
- 3.2 Protect public safety, property, and critical infrastructure.
- 3.3 Enhance coordination with fire suppression agencies.
- 3.4 Ensure safe and timely restoration of power after a wildfire event.
- 3.5 Provide transparency through public meetings, stakeholder engagement, and independent review.

(PUC §8387(b)(2)(B))

4. SYSTEM RISKS & MITIGATION STRATEGIES

- 4.1 Identified Risks
 - 4.1.1 High Wind Events, Vegetation Contact, Pole/Hardware Failure, Steep Topography, Climate Factors
- 4.2 Mitigation Strategies
 - 4.2.1 Covered conductors, recloser upgrades, underground lines where feasible, vegetation management, and updating design standards.
- 4.3 Prioritization of Risks
 - 4.3.1 See Appendix A

(PUC §8387(b)(2)(C), (H), (I), (J), (K), (L))

5. PERFORMANCE METRICS & EVALUATION

- 5.1 Metrics: Basis
 - 5.1.1 Utility-caused ignitions, vegetation miles cleared, % of inspections completed, equipment upgrades installed, and outage notifications.
- 5.2 Evaluation
 - 5.2.1 Audits, Corrective action plans, Integration of fire investigations into revisions.

(PUC §8387(b)(2)(D), (E), (N)(i)–(ii))

6. OPERATING STRATEGIES

- 6.1 Weather Monitoring
 - 6.1.1 Continuous monitoring of NWS Red Flag Warnings and local conditions.
- 6.2 Reclosing Protocols
 - 6.2.1 Automatic reclosing may be disabled during Red Flag Warnings or other elevated fire weather conditions. Although VEA does not have designated High Fire-Threat Districts within its California service area, reclosing decisions are made based on real-time system conditions, weather data, and operational risk assessments.

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6.3 De-Energization Protocols

- 6.3.1** De-energization decisions are made on a case-by-case basis using real-time and forecasted conditions, including high winds, low humidity, dry vegetation, active fire conditions, infrastructure risk, and impacts to essential services.

VEA's California service territory is served through a radial line configuration dependent on upstream Southern California Edison infrastructure and may be de-energized during SCE Public Safety Power Shutoff (PSPS) events. SCE's publicly documented PSPS framework considers factors such as high winds, low humidity, dry vegetation, and operational conditions, including baseline activation thresholds of approximately 31 mph sustained winds / 46 mph gusts for bare conductor circuits.

The Fish Lake Valley/Oasis area is served by bare conductor facilities, and VEA would utilize similar baseline thresholds when evaluating local de-energization considerations and operational response actions.

6.4 Power Restoration

- 6.4.1** Patrols conducted prior to re-energization; System Operators coordinate safe re-energization once verified.

(PUC §8387(b)(2)(F), (M))

7. NOTIFICATION PROCEDURES

7.1 Planned Outages

- 7.1.1** Advanced notice to customers via text/robocalls, postings on VEA's website.

7.2 Unplanned Outages

- 7.2.1** Outage map updated in real time; updates via text messages.

7.3 Public Safety Notifications

- 7.3.1** Critical facilities, telecoms, and first responders notified per Appendix C.

(PUC §8387(b)(2)(G))

8. COORDINATION WITH FIRE AGENCIES

8.1 VEA incorporates BLM/NREA MOU protocols, including:

- 8.1.1** Initial attack communication with BLM Duty Officer.
- 8.1.2** Extended attack coordination and Incident Command Post check-ins.
- 8.1.3** Fire investigation protocols, evidence handling, and custodian agreements.
- 8.1.4** Notification protocols for BLM critical infrastructure
- 8.1.5** Wildfire response within the Fish Lake Valley/Oasis area may involve coordination with BLM, federal wildland fire resources, and the Fish Lake Valley Volunteer Fire Department, depending on incident conditions and resource availability.

(PUC §8387(b)(2)(F), (N))

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9. VEGETATION MANAGEMENT

- 9.1 Vegetation management on distribution circuits is maintained on an approximate three-year trimming cycle. Additional work may be performed as needed based on inspections, observed conditions, or operational requirements.
- 9.2 Clearance distances in line with or exceeding CPUC standards.
- 9.3 Contractor oversight, performance auditing, and corrective action tracking.

(PUC §8387(b)(2)(H))

10. INSPECTION & CONTRACTOR OVERSIGHT

- 10.1 Inspection cycles
 - 10.1.1 Detailed inspections every 10 years.
- 10.2 Technology
 - 10.2.1 VEA utilizes inspection technologies such as drones and infrared imaging, where appropriate, to support the identification of potential equipment deficiencies and wildfire ignition risks.

VEA is currently in the process of initiating a pilot program to expand the use of these technologies within its inspection and maintenance practices. The pilot program will evaluate the effectiveness of drone-based inspections, infrared thermography, and related data collection methods in improving system reliability and early detection of potential hazards.

Findings from the pilot program will be used to determine the feasibility of broader implementation. As the program matures, VEA will incorporate additional details regarding inspection frequency, data integration, and operational procedures into future updates of this Wildfire Mitigation Plan.

- 10.3 Auditing
 - 10.3.1 Contractor-performed inspections subject to QA reviews.

(PUC §8387(b)(2)(I), (N)(iii))

11. PUBLIC ENGAGEMENT

- 11.1 Initial presentation of WMP at a noticed VEA Board of Directors meeting and then every four years afterwards.
- 11.2 Public comment period with responses documented.
- 11.3 Coordination with local agencies, town boards, and emergency services.

(PUC §8387(b)(3))

12. INDEPENDENT EVALUATION

- 12.1 Review every four years by a qualified independent evaluator.
- 12.2 Report published on VEA's website and presented at a public board meeting.

(PUC §8387(c))

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13. REVIEW & REVISION

13.1 VEA will maintain a process for identifying, documenting, evaluating, and correcting deficiencies in the WMP or its implementation. Deficiencies may be identified through annual WMP reviews, inspections, vegetation management activities, contractor audits, outage reviews, after-action reviews, fire investigations, public comments, agency coordination, independent evaluation findings, or changes in applicable law or guidance.

The Plan Owner, or designee, will review identified deficiencies and assign corrective actions where appropriate. Corrective actions may include procedure updates, additional training, changes to inspection or vegetation management practices, improved documentation, revised notification protocols, updated risk scoring, or future WMP revisions. Corrective actions will be tracked until completed, deferred with documented justification, or incorporated into a subsequent WMP update.

13.2 Update to be submitted every four years to the California Wildfire Safety Advisory Board by July 1.

(PUC §8387(b)(1))

Note: As of July 10, 2026, VEA has reviewed the findings and recommendations identified in the independent evaluation of this Wildfire Mitigation Plan and has incorporated updates intended to address the critical findings identified during that review. Future WMP updates will consider any additional recommendations, observations, or best-practice improvements identified through the independent evaluation process, operational experience, public comments, agency coordination, or changes in applicable law or guidance.

APPENDICES

- **Appendix A: Prioritized Wildfire Risk List**
- **Appendix B: High Fire-Threat District Maps**
- **Appendix C: BLM/NREA MOU (Points of Contact, Notification Protocols).**
- **Appendix D: Vegetation Management Program (Clearance Standards and Schedules).**
- **Appendix E: Inspection Program (Schedules, Contractor oversight).**
- **Appendix F: Fire Investigation Procedures (Evidence handling, interview protocols).**
- **Appendix G: Independent Evaluator Selection & Reporting Timeline**
- **Appendix H: Context Setting Table**

Valley Electric Association, Inc.

With approval from the Board of Directors



8/19/26

Name: Aaron Lynn

Title: Director of Line Operations, Valley Electric Association, Inc.

Date:

1. PURPOSE

This appendix provides a systematic methodology for identifying, ranking, and prioritizing wildfire risks associated with VEA's electrical system. The framework ensures risks are consistently evaluated across the service territory, integrating equipment, vegetation, environmental, and topographic/climatological drivers.

2. RISK CATEGORIES

Risks are grouped into the following categories, consistent with CPUC guidance and utility wildfire plans:

- 2.1 Equipment/Infrastructure Risks
 - 2.1.1 Aging poles and hardware
 - 2.1.2 Conductor failure (slap, breakage)
 - 2.1.3 Recloser/fuse malfunction
- 2.2 Vegetation Risks
 - 2.2.1 Trees and branches encroaching on lines
 - 2.2.2 Dead/diseased vegetation near facilities
- 2.3 Environmental Risks
 - 2.3.1 High winds (Red Flag events)
 - 2.3.2 Extreme temperatures and low humidity
 - 2.3.3 Drought conditions and fuel moisture
- 2.4 Topographic/Climatological Risks
 - 2.4.1 Steep slopes where fire spread is rapid
 - 2.4.2 Valleys or canyons with wind tunnel effects
 - 2.4.3 High desert ecosystems with flash-dry fuels
- 2.5 Critical Infrastructure / Community Risks
 - 2.5.1 Hospitals, water pumping stations, emergency communications towers
 - 2.5.2 Densely populated communities and evacuation-constrained areas

3. RISK SCORING METHODOLOGY

Each risk is scored based on Likelihood of Ignition and Consequence of Ignition.

- 3.1 Likelihood Factors (1–5 scale)
 - 3.1.1 Equipment age/condition
 - 3.1.2 Vegetation density/encroachment
 - 3.1.3 Wind/temperature/humidity exposure
 - 3.1.4 Historical ignition history
 - 3.1.5 Likelihood Scoring Definitions

3.2 Consequence Factors (1–5 scale)

- 3.2.1 Population density near circuit
- 3.2.2 Proximity to critical infrastructure
- 3.2.3 Fire spread potential (slope, fuels, canyon effect)
- 3.2.4 Suppression difficulty (access, distance from resources)

3.3 Risk Score Formula

Risk Score = (Likelihood Average) × (Consequence Average)

- 3.3.1 Scores range from 1 (Very Low) to 25 (Very High).
- 3.3.2 Circuits/assets scoring 16 or higher are considered Priority 1 for mitigation actions.

3.4 Application of Risk Scoring

- 3.4.1 Risk scores are assigned based on a combination of:
 - 3.4.1.1 Historical system performance
 - 3.4.1.2 Asset population density
 - 3.4.1.3 Environmental exposure conditions
 - 3.4.1.4 Operational experience within the service territory

For systems with limited asset populations and minimal historical failure rates, lower likelihood scores are assigned where supported by operational data and field experience.

VEA's California system represents a small subset of total assets, and scoring reflects both historical performance trends and localized risk conditions. In addition, VEA incorporates routine manual inspections, including inspections following high-wind events, as well as real-time operational monitoring tools (e.g., WeatherSentry and Watch Duty) to support situational awareness and proactive risk mitigation.

3.5 Aging Poles – Likelihood Rating Justification (Score = 1, Very Low)

The likelihood of pole failure within VEA's California service area is assessed as **Very Low (1)** based on the following factors:

- 3.5.1 **Limited Assets:** Approximately 314 poles are located within the California portion of VEA's system, representing less than 1% of VEA's total system (35,800 poles).
- 3.5.2 **Historical Performance:** In over 20 years of operation, fewer than five pole failures have been observed within this subset due to wind or other causes, resulting in an extremely low historical failure rate.
- 3.5.3 **Inspection Practices:** VEA conducts routine manual inspections, including inspections following high-wind events, to identify and address potential structural issues.
- 3.5.4 **Operational Monitoring:** VEA System Operations utilizes weather monitoring tools (WeatherSentry) and fire tracking applications (Watch Duty) to maintain situational awareness and respond proactively to elevated wildfire risk conditions.

Score	Description	General Criteria
1 – Very Low	Highly unlikely to occur	Minimal historical occurrence; limited asset exposure; low environmental stressors
2 – Low	Unlikely	Infrequent occurrence; moderate exposure to risk factors
3 – Moderate	Possible	Occasional issues or moderate exposure
4 – High	Likely	Repeated issues or strong exposure to risk factors
5 – Very High	Highly likely	Frequent failures or severe exposure conditions

APPENDIX A: PRIORITIZED WILDFIRE RISK LIST

- 3.5.5 Environmental Conditions:** The service area is characterized by low vegetation density and relatively low mechanical loading exposure, reducing external stressors that contribute to pole failure.

Based on these factors, aging poles are not considered a material driver of wildfire ignition risk within VEA's California service territory.

VEA has not identified wind-related structural failure trends within its California asset population and therefore does not consider additional pole loading analysis necessary at this time; this assumption will be revisited as part of future WMP updates.

4. *PRIORITIZED RISK LIST FOR FISH LAKE VALLEY, CA*

Risk Driver	Likelihood (1-5)	Consequence (1-5)	Risk Score	Priority Level	Mitigation Strategy
High winds in valley that may cause pole or vegetation breakage	1	2	2	Low	Disable reclosing, inspect, harden conductor, frequent patrols, maintain ROW
Vegetation encroachment and dead vegetation at Oasis Ranch	2	1	2	Low	Continuous vegetation clearance, and maintain ROW
Area Topography	1	1	1	Low	No steep or sloped terrain in area
Aging poles and cross arms throughout the valley	1	1	1	Low	Inspect frequently and replace/repair as needed
Critical Infrastructure	1	1	1	Low	No critical infrastructure in area

5. *APPLICATION OF METHODOLOGY*

- 5.1 Risk scoring is performed by VEA Engineering & Operations.
- 5.2 Scores used to prioritize vegetation cycles, equipment replacements, and underground projects.
- 5.3 High-priority circuits included in capital planning and O&M budgeting.
- 5.4 Scores updated with new climate/weather data, wildfire history, and CPUC fire-threat maps.

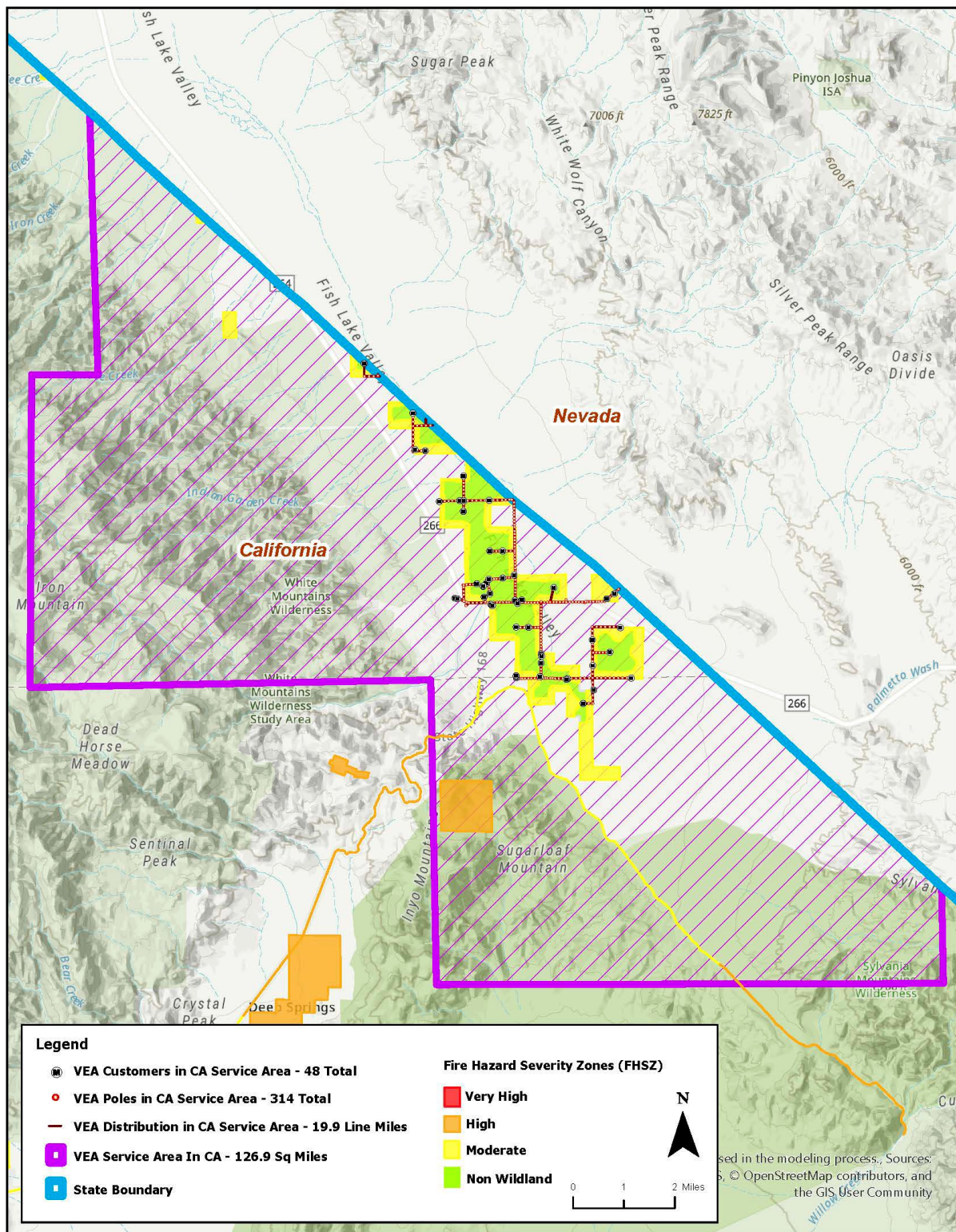
6. *INTEGRATION WITH ENTERPRISE SAFETY*

This methodology ensures wildfire risk is considered alongside other enterprise risks (safety, reliability, financial). Results are incorporated into:

- 6.1 Board-level reporting (WMP presentation every four years).
- 6.2 Public engagement process (community risk transparency).
- 6.3 Independent evaluator review (validation of methodology and priorities).

APPENDIX B: HIGH FIRE-THREAT DISTRICT MAP

NO INFRASTRUCTURE IDENTIFIED AS HIGH FIRE RISK



1. PURPOSE

This appendix formalizes Valley Electric Association's (VEA) coordination with federal, state, and local fire suppression agencies to ensure timely communication, de-energization decisions, and investigation support during wildfire events.

This framework is based on the Memorandum of Understanding (MOU) between NREA Members and the Bureau of Land Management (BLM) and ensures that VEA's operations align with PUC §8387 requirements for public safety, notification, and plan auditing.

2. ROLES AND RESPONSIBILITIES

2.1 VEA Responsibilities

- 2.1.1 Notification of potential and actual outages impacting BLM and other agency critical infrastructure.
- 2.1.2 Provision of circuit status (energized/de-energized), hazard identification, and impacts to essential services.
- 2.1.3 Designation of a Liaison Officer to coordinate with Incident Command during Extended Attack operations.
- 2.1.4 Real-time situational awareness using company monitoring assets.
- 2.1.5 Evidence protection and cooperation with fire investigations.

2.2 BLM Responsibilities

- 2.2.1 Primary contact point: BLM District Duty Officer (State Duty Officer as backup).
- 2.2.2 Notification to VEA when wildfire threatens VEA infrastructure.
- 2.2.3 Provision of fire details: location, size, behavior, projected movement, estimated time of impact.
- 2.2.4 Radio frequency assignments and communications integration for VEA staff.
- 2.2.5 Fire investigation leadership, including evidence handling and coordination with VEA personnel.

3. NOTIFICATION PROTOCOL

3.1 Threatened Powerline Notification

- When a wildfire threatens VEA infrastructure:
 - 3.1.1 BLM Duty Officer contacts VEA Dispatch/Liaison.
 - 3.1.2 BLM provides:
 - 3.1.2.1 Fire location, size, behavior, projected movement, estimated impact time.
 - 3.1.3 VEA provides:
 - 3.1.3.1 Status of powerlines (energized/de-energized).
 - 3.1.3.2 Safety hazards for firefighting personnel.
 - 3.1.3.3 Critical infrastructure concerns (hospitals, water pumping, emergency communications).
 - 3.1.4 Joint decision is made regarding de-energization.
 - 3.1.5 Updates exchanged at regular intervals until fire threat subsides.

3.2 Outage Notification for Critical Infrastructure

- When a planned or unplanned outage affects BLM or other critical facilities:
 - 3.2.1 VEA promptly notifies the appropriate Fire Dispatch Center.
 - 3.2.2 BLM provides geographic coordinates of affected sites (Attachment C-1).
 - 3.2.3 VEA provides:
 - 3.2.3.1 Estimated outage duration.
 - 3.2.3.2 Backup system activation status.
 - 3.2.3.3 Restoration timeline once fire threat passes.

3.3 Initial Attack (IA) & Extended Attack Coordination

3.3.1 Initial Attack:

3.3.1.1 VEA's Dispatch notified by BLM Dispatch upon fire confirmation.

3.3.1.2 Duty Officer-to-Duty Officer communication established.

3.3.2 Extended Attack:

3.3.2.1 VEA Liaison checks in at Incident Command Post (ICP).

3.3.2.2 VEA provides ongoing infrastructure updates, de-energization support, and restoration coordination.

3.3.2.3 Liaison remains available to Operations Section Chief or IC.

3.4 Participation in Incident Planning

3.4.1 VEA is not part of Unified Command, but participates in planning sessions to:

3.4.1.1 Provide infrastructure updates.

3.4.1.2 Coordinate with Operations Section.

3.4.1.3 Share situational awareness with utility assets.

4. RADIO FREQUENCY ASSIGNMENTS & COMMUNICATION PROTOCOLS

4.1 Provide VEA personnel receive temporary access to incident radio frequencies during fire events.

4.2 Priority frequency use is reserved for suppression activities; utility communications limited to fire-related emergency coordination.

4.3 Interference/misuse addressed by Incident Commander or COML; may result in suspension of access.

4.4 VEA ensures all participating staff are trained in radio protocol compliance.

5. FIRE INVESTIGATION COORDINATION

5.1 VEA preserves fire origin areas to support BLM fire investigation.

5.2 Evidence may not be removed without authorization from BLM investigators.

5.3 Interviews of VEA personnel conducted in presence of VEA management.

5.4 Chain-of-custody for evidence jointly maintained when large/hazardous utility equipment is involved.

5.5 VEA provides operational/maintenance records when requested.

6. MONITORING & AUDITING

6.1 After each major fire event, VEA and BLM conduct a joint after-action review.

6.2 Effectiveness of coordination, notification, and investigation processes are evaluated.

6.3 Corrective actions incorporated into the next WMP update.

7. CRITICAL INFRASTRUCTURE COORDINATION AND DATA RETENTION

7.1 Overview

7.1.1 Valley Electric Association (VEA) maintains an internal Critical Infrastructure Contact Matrix identifying federal, state, and local facilities coordinated under the 2025 NREA–BLM Memorandum of Understanding. This matrix includes geographic coordinates, contact information, and notification protocols for facilities such as BLM dispatch centers, repeater sites, communication towers, water pumping stations, and other critical assets that may require direct notice in the event of system outages, maintenance activities, or Public Safety Power Shutoffs (PSPS).

7.2 Data Retention & Security

- 7.2.1** For security and sensitivity reasons, these specific coordinates and contact details are retained internally within VEA's Emergency Management and Operations divisions and are not published in the publicly filed Wildfire Mitigation Plan. All notifications and coordination activities are conducted through established MOU channels and verified via periodic joint exercises with BLM and county fire agencies.

7.3 Agency Points of Contact (Summary)

- 7.1.1** BLM California Desert District – Ridgecrest Field Office (760) 384-5400
BLM_CA_Web_RI@blm.gov
- 7.1.2** VEA System Operations Center (24/7 Dispatch) (775) 727-2188
- 7.1.3** Emergency Management Coordinator/Director of Line Operations: Aaron Lynn,
(775) 253-5197 aaronl@vea.coop

1. PROGRAM OBJECTIVES:

- 1.1 Maintain required vegetation clearances around all distribution and transmission facilities.
- 1.2 Exceed minimum industry standards (CPUC GO 95).

2. CLEARANCE STANDARDS:

- 2.1 Distribution (≤ 34.5 kV): 10-feet Clearance To Wire
- 2.2 Transmission (69 kV – 230 kV): 16-feet Clearance To Wire
- 2.3 High Fire-Threat Areas: Enhanced clearances based on local conditions and fire risk scoring.
 - 2.3.1 No High Fire-Threat Area within our service territory.

3. CYCLE FREQUENCY:

- 3.1 Distribution: Every 3 years
- 3.2 Transmission: Every 3 years

4. CONTRACTOR OVERSIGHT:

- 4.1 All contractors must comply with VEA Vegetation Management Standards.
- 4.2 VEA audits at least 10% of contractor work for compliance.

1. INSPECTION OBJECTIVES:

- 1.1** Identify and correct equipment deficiencies that may create ignition risks.
- 1.2** Exceed minimum CPUC inspection requirements.

2. INSPECTION CYCLES:

- 2.1** Distribution Poles: Detailed inspection every 10 years. Patrolled annually.
- 2.2** Transmission Poles: Detailed inspection every 10 years. Patrolled annually.
- 2.3** Substations: Detailed monthly inspections

3. INSPECTION METHODS:

- 3.1** Ground patrols.
- 3.2** Aerial patrols using drones/helicopters.
- 3.3** Infrared thermography for hotspots.

4. CONTRACTOR AUDITING:

- 4.1** Independent QA audits on at least 10% of inspection work.
- 4.2** Deficiencies tracked in VEA's asset management system until resolved.

FIRE INVESTIGATION QUESTIONS

The BLM fire investigators may seek information regarding, but not limited to, the following areas of concern: recent maintenance and repairs, recent issues or outages, proximity of personnel or equipment, circuit information, and visual documentation that may be pertinent to the investigation. A copy of the witness statement will be provided to the ROW holder.

***COMMON FIELD LINEMAN QUESTIONS, MAY INCLUDE BUT NOT LIMITED TO:
THE BLM FIRE INVESTIGATORS SHOULD REQUEST UTILITY MANAGEMENT IS PRESENT FOR QUESTIONS.***

- 1. WHEN YOU FIRST ARRIVED ON SCENE WHAT DID YOU OBSERVE?***
 - 1.1 Wildfire location on arrival?***
 - 1.2 Equipment damaged?***
 - 1.3 People or vehicles in the area?***
- 2. HAS THERE BEEN ANY MAINTENANCE OR REPAIR WORK CONDUCTED RECENTLY?***
 - 2.1 If so, please specify the date of these activities.***
 - 2.2 What specific actions were carried out during this maintenance or repair?***
 - 2.3 Are there official records available regarding these activities?***
- 3. WERE ANY EMPLOYEES, CONTRACTORS, OR EQUIPMENT LOCATED NEAR THE LINES OR POLES PRIOR TO THE ARRIVAL OF FIRE INVESTIGATORS?***
 - 3.1 Were any actions initiated in response to this proximity?***
 - 3.2 Were any items moved or removed from the vicinity?***
- 4. CAN YOU PROVIDE DETAILS ON THE ROUTE OF THE INVOLVED CIRCUIT?***
 - 4.1 Are there maps available for review that depict the circuit's path?***
- 5. PROVIDE PHOTOS AND VIDEOS***
 - 5.1 Provide photos and videos to investigator.***
 - 5.2 Can you assist us in taking photos? Ex: Take a photo from the boom truck.***

COMMON QUESTIONS FOR MANAGEMENT/SUPERVISORS, MAY INCLUDE BUT NOT LIMITED TO:

- 1. HAVE THERE BEEN ANY RECENT DISRUPTIONS OR OUTAGES WITHIN THE AREA OF INTEREST?***
 - 1.1 Are the relevant records pertaining to these incidents accessible to investigators?***
- 2. HAS THERE BEEN ANY MAINTENANCE OR REPAIR WORK CONDUCTED RECENTLY?***
 - 2.1 If so, please specify the date of these activities.***
 - 2.2 What specific actions were carried out during this maintenance or repair?***
 - 2.3 Are there official records available regarding these activities?***
- 3. CAN YOU PROVIDE DETAILS ON THE ROUTE OF THE INVOLVED CIRCUIT?***
 - 3.1 Are there maps available for review that depict the circuit's path?***
- 4. WERE ANY PHOTOGRAPHS OR VIDEO, INCLUDING FOOTAGE RECORDED BY DASH CAMS, CAPTURED BY EMPLOYEES OR CONTRACTORS?***
 - 4.1 If so, are these photographs or recordings available for review by the investigators?***

1. EVALUATOR SELECTION:

- 1.1** VEA shall retain a qualified independent evaluator with expertise in:
 - 1.1.1** Electrical system operations.
 - 1.1.2** Wildfire mitigation strategies.
 - 1.1.3** Utility safety performance assessment.

2. EVALUATION PROCESS:

- 2.1** Independent evaluator conducts a comprehensive review every four years.
- 2.2** Evaluator assesses completeness, accuracy, and sufficiency of the WMP.
- 2.3** Evaluator issues a written report with findings and recommendations.

3. REPORTING TIMELINE:

- 3.1** Evaluator's Report due: Within 90 days of WMP filing.
- 3.2** Publication: The independent evaluator's report will be posted on VEA's website as required by California Public Utilities Code §8387, subsection (c).
- 3.3** Presentation: Report will be presented at a noticed VEA Board of Directors meeting within 120 days of filing.
- 3.4** Retention: Reports archived for public access for at least 5 years.

APPENDIX H – CONTEXT SETTING TABLE

Utility Name	Valley Electric Association, Inc. * All data provided reflects the CA portion of our service territory only.	
Service Territory Size	126.9 Square Miles	
Owned Assets	☐ Transmission ☒ Distribution ☐ Generation	
Number of Customers Served	48	
Population Within Service Territory	45 (Estimate based on residential accounts)	
Customer Class Makeup	Number of Accounts	Share of Total Load (MWh)
	Residential: 18	~38%
	Irrigation: 28	~58%
	General: 2	~4%
Service Territory Location/Topography	Oasis, California (Mono County); rural high-desert agricultural area characterized by flat basin terrain, with low vegetation and development density.	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Tier 2: 0%	
	Tier 3: 0%	
Prevailing Wind Directions & Speeds by Season	Prevailing winds in the service territory are variable due to local topography, with typical westerly to southwesterly flow. Seasonal high-wind events in spring and fall may produce sustained winds of 20–35 mph with gusts exceeding 45–55 mph.	
Miles of Owned Lines Underground and/or Overhead	Overhead Distribution.: ~20 miles	
	Overhead Transmission: 0 miles	
	Underground Distribution: <1 mile	
	Underground Transmission: 0 miles	
Percent of Owned Lines in CPUC High Fire Threat Districts	Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)	
	Tier 2: 0%	
	Tier 3: 0%	
Have customers ever lost service due to an IOU PSPS event?	☒ Yes ☐ No	
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☒ Yes ☐ No	
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☒ Yes ☐ No	
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☒ Yes ☐ No	

BOARD RESOLUTION NO. 2026-05

**RESOLUTION OF THE BOARD OF DIRECTORS
OF VALLEY ELECTRIC ASSOCIATION, INC.**

WHEREAS, California Public Utilities Code §8387 requires local publicly owned electric utilities and cooperatives to prepare and adopt a Wildfire Mitigation Plan; and

WHEREAS, VEA serves a small number of customers in the Fish Lake Valley area who are located in California (Approximately 50 members), and

WHEREAS, Valley Electric Association, Inc. (VEA) has prepared a Wildfire Mitigation Plan incorporating vegetation management, inspection, de-energization protocols, public safety notifications, and coordination with state and federal fire suppression agencies; and

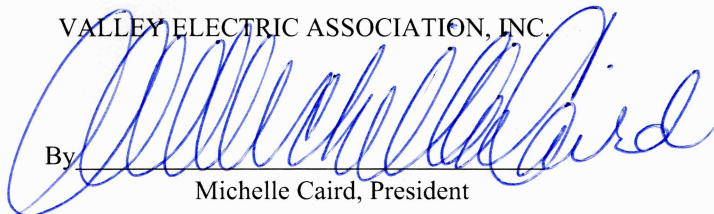
WHEREAS, the Board of Directors has reviewed the Plan, finds it consistent with statutory requirements, and desires to formally adopt it;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of Valley Electric Association, Inc. hereby adopts the 2026 Wildfire Mitigation Plan as presented, and authorizes its filing with the California Wildfire Safety Advisory Board in compliance with PUC §8387;

BE IT FURTHER RESOLVED that the CEO and the Director of Line Operations are authorized to execute and implement the Plan, and to take all necessary actions to comply with filing, reporting, and public transparency requirements, including publication of the Independent Evaluator's Report.

VALLEY ELECTRIC ASSOCIATION, INC.

By

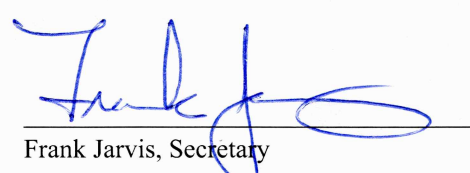

Michelle Caird, President

CERTIFICATE

I, Frank Jarvis, do hereby certify that I am Secretary of Valley Electric Association, Inc.

THAT the above resolutions are a true and correct copy of the resolution adopted by the board of directors of Valley Electric Association, Inc. at its meeting held on the 5th day of August 2026, in Pahrump, Nevada, and that said resolution has not been rescinded or modified.

IN WITNESS WHEREOF, I have set my hand this 5th day of August 2026.


Frank Jarvis, Secretary