MODESTO IRRIGATION DISTRICT

2026–2029 Wildfire Mitigation Plan

Independent Evaluator's Report

Pursuant to California Public Utilities Code § 8387(c)

Prepared by

Electric Power Engineers, LLC

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Disclaimer

This Independent Evaluator's Report was prepared by Electric Power Engineers, LLC ("EPE") for the Modesto Irrigation District ("MID" or "the District") pursuant to California Public Utilities Code § 8387(c) and MID procurement reference RFP No. 24646.

The opinions, findings, and recommendations presented in this Report reflect EPE's professional judgment based on the information made available to EPE at the time of the engagement, including the District's 2026–2029 Wildfire Mitigation Plan dated October 2, 2026; prior MID wildfire mitigation plans (2019, 2021, 2022, and 2023–2025 in its July 2024 and July 2025 forms); the prior Independent Evaluator's Report prepared by Anser Advisory Management LLC (June 2, 2023); Responses to Information Requests provided by MID (including the MID Emergency Operations Plan, Osmose Inspection Report, New Hogan CCWD–MID Operating Agreement, and Operating Bulletins No. 037 and 042); and applicable California statutes and guidance current as of the report date.

EPE is not responsible for the reader's use of, or reliance upon, this Report. Readers are advised that they assume all liabilities incurred by them or by third parties as a result of any reliance on the data, information, findings, or opinions in this Report. The Report is intended for use by MID, the California Wildfire Safety Advisory Board, the public, and other agencies in connection with the District's submission under PUC § 8387.

A. Executive Summary

California Senate Bill 901 (2018), Assembly Bill 1054 (2019), and most recently Senate Bill 254 (2025) require each local publicly owned electric utility and electrical cooperative subject to Public Utilities Code § 8387 to prepare and submit a Wildfire Mitigation Plan (WMP) to the California Wildfire Safety Advisory Board (WSAB). SB 254, effective September 19, 2025, amended § 8387(b)(1) to require submission at least once every four years on a schedule established by the WSAB; the WSAB-approved POU schedule (December 2025) sets the District's first comprehensive submission under the new cadence at October 2, 2026.

In compliance with PUC § 8387(c), the Modesto Irrigation District contracted with Electric Power Engineers, LLC (EPE), through a competitive procurement (RFP No. 24646), to serve as the qualified Independent Evaluator (IE) of its 2026–2029 WMP. This Report presents EPE's independent assessment of the comprehensiveness of MID's 2026–2029 WMP.

EPE's evaluation methodology comprised: (i) a sub-by-sub statutory compliance review against PUC § 8387; (ii) a benchmarking review against similarly situated California POUs and against the WSAB's most recent Guidance Advisory Opinion; (iii) detailed engineering review of the WMP's risk modeling, asset management, vegetation management, inspections, situational awareness, operational practices, HFTD applicability, and grid-hardening programs; (iv) cross-cycle comparison against MID's prior WMPs (2019, 2021, 2022, and 2023-2025); and (v) review of MID's prior Independent Evaluator's Report (Anser, June 2, 2023) for continuity of findings.

Overall Conclusion

Based on this evaluation, EPE concludes that the Modesto Irrigation District's 2026–2029 Wildfire Mitigation Plan is comprehensive and meets the requirements of California Public Utilities Code § 8387(b)(2). The Plan demonstrates continued improvement over the District's prior WMP cycles, reflects the District's measured risk profile (limited HFTD exposure consisting of 1.6 miles / 30 poles of the CCWD-owned, MID-operated 60kV New Hogan line in Tier 2), and contains a coherent program of preventive strategies, performance metrics, and corrective-action processes.

EPE identifies four (4) Recommendations (Medium severity) and six (6) Observations (Low severity) for the District's consideration. No Material Gaps were identified. The full set is summarized in Section H and tabulated in the accompanying Gap, Deficiency & Recommendation Register.

Notable Year-over-Year Improvements

- **Expansion of PRC §4292 brush clearing** from 2 poles (2022–2024) to all 47 New Hogan poles in 2025–2026 (WMP §5.4.2.4 / Table 8).
- **Completion of intrusive pole inspections** for all HFTD wood poles in 2025, with one failed guy pole replaced on April 3, 2025 (WMP §5.5.1.4).
- **Avian protection response** to the August 2025 60kV New Hogan bird-contact event, with avian-protection equipment installed at the affected structure (WMP §5.3.2).
- **Wires-down reduction** outside HFTD from 38 (2024) to 21 (2025), per WMP Table 7.
- **OCB-to-ACB program** with five oil circuit breakers replaced at non-HFTD substations during the 2023-2025 cycle (WMP §5.3.3).

B. Purpose of the Independent Evaluation

California Public Utilities Code § 8387(c) provides that each local publicly owned electric utility or electrical cooperative "shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the internet website of the local publicly owned electric utility or electrical cooperative and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board."

The Modesto Irrigation District, in compliance with this requirement, issued Request for Proposal No. 24646 on April 13, 2026, soliciting proposals from qualified firms to conduct a comprehensive, independent review of the District's 2026–2029 WMP pursuant to WSAB guidelines and PUC § 8387. Electric Power Engineers, LLC was selected through that competitive process.

This Report responds to the Scope of Work set forth in Attachment A to RFP No. 24646, namely:

- Compliance and Industry Assessment — assess MID's compliance with all applicable elements of PUC § 8387; evaluate whether the WMP appropriately reflects MID's system characteristics; compare MID's wildfire mitigation strategies, risk modeling, asset management, vegetation management, inspection protocols, situational awareness tools, and operational practices against industry standards and best practices for similarly situated utilities; identify gaps, deficiencies, inconsistencies, or areas requiring clarification; and provide findings regarding the reasonableness and effectiveness of MID's wildfire mitigation strategies.
- Independent Evaluation Report — this document, drafted to be suitable for public disclosure and regulatory review and including an executive summary, compliance assessment, industry benchmarking analysis, identification of material gaps and risks, and recommendations for improvement.
- Presentation to the MID Board of Directors — to be delivered by EPE at a duly noticed in-person public meeting of the MID Board, scheduled by MID, in July, August, or September 2026.
- Regulatory Filing — documentation necessary for MID to submit the Independent Evaluation to the WSAB, plus reasonable assistance in responding to WSAB clarification requests.
- Public Posting — finalized documents in a format suitable for publication on MID's public website.

C. Evaluator Qualifications

Electric Power Engineers, LLC (EPE) is a global power-systems engineering and consulting firm dedicated to the electric utility and energy industry. Founded in 1968, EPE has supported utilities, public agencies, system operators, regulators, and energy developers with technically rigorous, defensible solutions across the full lifecycle of electric power systems planning, design, operation, and regulatory compliance. EPE's team of 650+ power systems consultants includes distribution and transmission planners, protection and controls specialists, regulatory compliance professionals, data scientists, and software developers.

EPE's qualifications to serve as the District's Independent Evaluator under PUC § 8387(c) include direct engagement experience in wildfire mitigation assessment and adjacent fields:

- **Wildfire risk integration with sensor and asset programs:** EPE has supported large investor-owned utilities (including Pennsylvania Power & Light) in integrating a normalized Wildfire Risk Factor (derived from U.S. Forest Service wildfire risk data) into distribution-level sensor alert prioritization, embedding wildfire risk alongside asset condition, load, and failure probability.
- **Utility WMP and Independent Expert review experience:** EPE has supported multiple utilities with Independent Expert and Independent Evaluator engagements for Wildfire Mitigation Plans.
- **California utility experience:** EPE has direct experience with California POU and IOU regulatory frameworks, distribution planning, integrated resource planning, and CPUC compliance work.
- **Distribution planning depth:** EPE has supported utilities including Puget Sound Energy in updating distribution planning guidelines, integrating non-wires alternatives, weather and extreme-temperature scenarios, and bottom-up forecasting methods relevant to wildfire-program design.

Character, Integrity, and Independence

EPE has no ownership, employment, or material financial relationship with the Modesto Irrigation District, the Calaveras County Water District, or Pacific Gas & Electric Company that would impair its independence in conducting this evaluation. EPE has performed this evaluation independently of MID's WMP development team.

This engagement was conducted under the project leadership of Jonathan Fleming, P.E., PMP, M.S., Associate Director, Distribution Design & Grid Modernization, Electric Power Engineers.

D. Evaluation Methodology

EPE's evaluation methodology comprised five interlocking work streams. Each is summarized below; underlying workpapers are available in the deliverables set transmitted with this Report.

D.1 Statutory Compliance Review

EPE reviewed each sub-requirement of California PUC § 8387 (as amended by SB 254) and mapped it to the section(s) and page(s) of the 2026–2029 WMP that address it. Each mapping was assessed against five outcomes: Meets; Meets with Observation; Partially Meets; Does Not Meet; or Not Applicable. The full sub-by-sub mapping is presented in Section E of this Report and in the accompanying §8387 Compliance Matrix workpaper.

D.2 WSAB Guidance Review

EPE reviewed MID's 2026–2029 WMP against the most recent published Guidance Advisory Opinion issued by the California Wildfire Safety Advisory Board for electric POU and electrical cooperative WMPs, with particular attention to (a) MID-specific feedback from prior cycles and (b) generic recommendations applicable to all POUs. Findings are summarized in Section F.

D.3 Engineering Review (Workpapers)

EPE conducted topic-by-topic engineering review of: risk modeling; asset management; vegetation management; inspections; situational awareness; operational practices; HFTD applicability; and grid hardening. For each topic, EPE captured (i) what the 2026–2029 WMP states, with page citations; (ii) the prevailing industry or best-practice reference; (iii) the evaluator's assessment; and (iv) any recommended action. The detailed workpapers are transmitted as a separate Excel deliverable.

D.4 Peer / Industry Benchmarking

EPE benchmarked MID's WMP practices against six similarly situated California publicly owned utilities — Turlock Irrigation District (TID), Sacramento Municipal Utility District (SMUD), City of Roseville Electric, Imperial Irrigation District (IID), Merced Irrigation District, and Trinity PUD — across fifteen WMP elements. MID's relative position is summarized in Section G.

D.5 Cross-Cycle Comparison

EPE reviewed MID's prior WMPs (Nov 2019, 2021, 2022, and the 2023–2025 Comprehensive Update with its July 2024 and July 2025 updates) and compared them against the 2026–2029 Plan, with attention to which prior-cycle WSAB feedback has been addressed and which content has carried over unchanged. This comparison informed the findings in Section H and is available in full in the Prior-WMP Comparison workpaper.

D.6 Documents Reviewed

A complete list of documents reviewed for this engagement appears in Appendix A. Source documents include the 2026–2029 WMP itself, the District's prior WMPs and the prior Independent Evaluator's Report, MID's response to EPE's Request for Information (including the MID Emergency Operations Plan, the Osmose Inspection Report, the New Hogan CCWD–MID Operating Agreement, and Operating Bulletins 037 and 042), and applicable statutes and guidance documents.

E. Analysis of Required WMP Elements (PUC §8387)

Pursuant to PUC § 8387(b)(2), MID's WMP must consider, at a minimum, the requirements set forth in subsections (A) through (N). The table below maps each statutory sub-requirement to the District's 2026–2029 WMP and presents EPE's assessment with supporting page references.

§ Cite	Requirement	WMP §	WMP Page(s)	Status	Evidence / Note
§8387(a)	Construct, maintain & operate to minimize wildfire risk	§2.4, §2.5, §5	17–18, 34–45	Meets	Mitigation strategies described in §5 (pp.34-45); ignition-minimization framing in §2.4 (p.17) and grid resiliency in §2.5 (p.18).
§8387(b)(1)	Prepare WMP and submit to WSAB ≥ every 4 years per WSAB schedule (SB 254 amendment)	§2.2, §3.3 (Table 4)	8, 21	Meets	§2.2 (p.8) addresses the SB 254 amendment; Table 4 (p.21) shows Oct 2, 2026 cycle date per WSAB-approved schedule.
§8387(b)(2)(A)	Accounting of responsibilities of persons executing the plan	§3.1, §3.2 (Table 3)	19–21	Meets w/ Observation	Table 3 (p.20) assigns titled positions; recommend named primary/backup individuals (see G-001).
§8387(b)(2)(B)	Objectives of the WMP	§2.4–§2.6	17–18	Meets	Three objectives clearly articulated: minimize ignition, improve resiliency, measure effectiveness.
§8387(b)(2)(C)	Preventive strategies including dynamic climate change risks	§5 (overall); §4.6	26-28, 34-45	Meets w/ Observation	Comprehensive §5 strategies; climate adaptation analysis is forward-looking (see G-002).
§8387(b)(2)(D)	Metrics and assumptions	§7.1 (Tables 6–8)	48–50	Meets	Three CMUA/WSAB-aligned metrics with multi-year data.
§8387(b)(2)(E)	How prior metrics inform the plan	§7.5	51	Meets w/ Observation	Bird-contact event → avian protection cited; opportunity to expand (G-003).
§8387(b)(2)(F)	Recloser disabling / de-energization protocols	§5.7, §5.8	44–45	Meets	No recloser on New Hogan (structural); PG&E-coordinated PSPS framework documented.
§8387(b)(2)(G)	Customer & critical-infrastructure notification	§5.8.1–§5.8.2, §6	45–47	Meets w/ Observation	Substantively satisfied (no MID customer impact); recommend

§ Cite	Requirement	WMP §	WMP Page(s)	Status	Evidence / Note
					explicit EOP cross-reference (G-004).
§8387(b)(2)(H)	Vegetation management plans	§5.4 (incl. 5.4.1–5.4.2)	38–41	Meets	Comprehensive standards, procedures, qualifications, cadence, brush-clearing expansion.
§8387(b)(2)(I)	Inspection plans	§5.5	42–43	Meets	GO 95/165/174 compliance; 5/yr HFTD patrols; 2025 intrusive pole inspection completed.
§8387(b)(2)(J)	Prioritized list of all wildfire risks and drivers	§4 (overall)	22–33	Meets w/ Observation	Risks enumerated but explicit prioritization absent (see G-005).
§8387(b)(2)(J)(i)	Risks from design / construction / O&M	§4.7	28–29	Meets	New Hogan line characterization complete with figures.
§8387(b)(2)(J)(ii)	Topographic & climatological risk drivers	§4.2 (and 4.3–4.6)	23–28	Meets	Modesto-specific data on temperature, wind, drought.
§8387(b)(2)(K)	Geographic areas higher than CPUC map / HFTD expansion recommendation	§4.8–§4.10	30–33	Meets	MID concurs with HFTD; FHSZ review confirms no additional exposure.
§8387(b)(2)(L)	Methodology for enterprise-wide safety risk	§4.1	22–23	Partially Meets	Methodology described in narrative form only (see G-006).
§8387(b)(2)(M)	Restoration of service after a wildfire	§5.8.3	45–46	Meets	System Restoration Plan referenced; PSPS-specific 5-step procedure documented.
§8387(b)(2)(N)(i)	Monitor/audit implementation	§7.3	50–51	Meets	Department-lead accountability with corrective-action linkage.
§8387(b)(2)(N)(ii)	Identify & correct deficiencies	§7.4	51	Meets	Corrective-action commitment documented.
§8387(b)(2)(N)(iii)	Audit effectiveness of inspections (including contractor)	§5.4.2.5; §5.5	42	Partially Meets	Frequency cited as substitute for QA/QC — see G-007.
§8387(b)(3)	Present at noticed public meeting; accept comments; verify compliance	§3.3	21–22	Meets (procedural)	Adoption process documented; will be fully satisfied upon Board adoption.
§8387(c)	Contract with qualified IE; IE	§8	51–52	Meets	EPE engaged via RFP No. 24646 on 4-yr

§ Cite	Requirement	WMP §	WMP Page(s)	Status	Evidence / Note
	Report posted & presented				cycle aligned with WSAB schedule.

E.1 Summary of Statutory Compliance

MID's 2026-2029 WMP meets nineteen (19) of the twenty-two (22) PUC § 8387 sub-requirements identified above, with two requirements (§8387(b)(2)(L) — risk methodology; and §8387(b)(2)(N)(iii) — effectiveness auditing of inspections) assessed as Partially Meets. None of the assessed sub-requirements rises to a Does Not Meet status. The corresponding recommendations appear in Section H.

F. Wildfire Safety Advisory Board Guidance Review

The WSAB publishes periodic Guidance Advisory Opinions setting expectations for POU and electrical-cooperative WMPs. EPE reviewed the most recent published opinion applicable to MID's 2026-2029 cycle, together with MID-specific feedback issued by the WSAB in prior cycles (notably, the 2022 Guidance Advisory Opinion's recommendations regarding context-setting templates, climate-change specificity, design and construction standards refresh, and PSPS / IOU-customer impact analysis).

F.1 Continuity with Prior WSAB Feedback

MID's 2026-2029 WMP preserves the elements that earned positive WSAB commendation in prior cycles, including the comprehensive statutory cross-reference table (§2.2, Table 1), the context-setting template (§2.3, Table 2), and the well-maintained public-website disclosure practice (§3.4). MID has also retained the climate-change content and IOU-PSPS impact analysis that were strengthened in response to the 2022 WSAB Guidance Advisory Opinion.

F.2 Open Items vs. WSAB Recommendations

EPE identifies two areas where MID is, as of this Report, behind WSAB-recommended practice for similarly situated POUs:

- **Operating-condition framework:** WMP §5.1 (p.35) explicitly states that MID does not assign different operating conditions based on current or forecasted weather, and that MID is evaluating WSAB-recommended operating conditions for the 2028 update. EPE recommends that MID establish an internal milestone for this decision (Recommendation G-009).
- **Effectiveness auditing of inspections (QA/QC):** WMP §5.4.2.5 (p.42) states that no separate QA/QC of vegetation work is performed because of inspection frequency. The 2023-2025 Anser IE Report likewise recommended additional procedural language on wood-pole inspection. EPE recommends a documented sampling-based QA/QC process (Recommendation G-007).

The full WSAB element-by-element crosswalk is provided in the accompanying WSAB Guidance Crosswalk workpaper.

G. Benchmarking Industry Practices and Standards

EPE benchmarked MID's 2026-2029 WMP against six similarly situated California publicly owned utilities across fifteen WMP elements. Detailed comparisons are presented in the accompanying Peer Benchmarking workbook; the salient observations are summarized below.

G.1 Where MID is On Par or Above Peer Practice

- **HFTD exposure profile:** MID's limited HFTD exposure (1.6 miles in Tier 2) is consistent with TID, Roseville Electric, and IID, and below SMUD and Trinity PUD.
- **Statutory cross-reference and context-setting:** MID's tables are at or above the level of detail provided by peer POUs.
- **Vegetation inspection cadence:** 5 inspections/year on HFTD transmission, with biweekly substation inspections, is above the prevailing peer-utility baseline of 4 transmission inspections/year.
- **Asset inspections (HFTD transmission):** 5 patrols/year plus annual detailed inspections is at or above peer cadence.
- **Mutual aid & POU collaboration:** Bi-weekly CMUA WMP calls, CUEA membership, and WEI/WRMAA participation are standard for the larger CA POUs and exceed the practice of smaller districts.

G.2 Where MID Trails Leading Peer Practice

- **Risk methodology and prioritization:** Leading peer POUs (notably SMUD) document an explicit risk methodology with prioritization; MID's narrative description is briefer (Recommendations G-005, G-006).
- **Vegetation QA/QC:** Most benchmark peers maintain some form of supervisor spot-checking or sampling-based QA/QC; MID has not yet adopted one (Recommendation G-007).
- **Operating-condition framework:** Most peers have adopted at least a basic operating-condition tier framework; MID has not (Recommendation G-009).

H. Findings, Observations, and Recommendations

EPE has consolidated all findings from the statutory matrix, WSAB crosswalk, engineering workpapers, peer benchmarking, and prior-cycle comparison into a single register. The table below presents the consolidated findings. The accompanying Gap, Deficiency & Recommendation Register provides the same information in editable form with owner and target-resolution columns.

ID	Category	WMP § / Page	Finding	Recommendation	Severity
G-001	Roles & Responsibilities	§3.2 / p.20	Table 3 lists titled positions only.	Maintain a separately referenced internal contact list with primary/backup names, refreshed annually.	Low (Observation)
G-002	Climate Change	§4.6 / pp.26-28	Climate-adaptation analysis is forward-looking; concrete linkage to current program design is not stated.	In next update, tie at least one identified climate trend to a specific WMP program-design decision.	Low (Observation)
G-003	Metrics-to-Plan Linkage	§7.5 / p.51	Brief discussion; cause-and-effect not fully traced.	Expand to trace 2-3 specific 2026-2029 changes back to metric trends or events.	Low (Observation)
G-004	Notification Cross-Reference	§5.8.2, §6.2 / pp.45, 47	No explicit cross-reference between de-energization notification and the Emergency Operations Plan / CISA-sector coordination.	Add a one-sentence cross-reference in §5.8.2 to the EOP and §6.2 for full traceability.	Low (Observation)
G-005	Risk Prioritization	§4 / pp.22-33	Risk drivers enumerated but not prioritized as required by §8387(b)(2)(J).	Insert a qualitative High/Medium/Low risk-ranking table at the end of §4.	Medium
G-006	Risk Methodology	§4.1 / p.23	No documented framework presented.	Add a 1-2 paragraph methodology subsection in §4.1.	Medium
G-007	Effectiveness Auditing / QA-QC	§5.4.2.5 / p.42 (and §5.5)	Inspection frequency cited as substitute for QA/QC effectiveness auditing — also flagged in 2023-2025 Anser IE.	Implement sampling-based re-inspection of contractor VM work and supervisor spot-checks of line inspections, tied to corrective action.	Medium
G-008	D&C Standards Refresh	§5.2 / p.35	Section is brief; recent D&C improvements not captured.	Add a short paragraph summarizing 2023-2025 D&C improvements (e.g., OCB→ACB program).	Low (Observation)
G-009	Operating-Condition Framework	§5.1 / p.35	WSAB-recommended framework not yet adopted; commitment deferred to 2028 update.	Set an internal interim milestone (e.g., decision by year-end 2027) and report progress in the 2028 update.	Medium

ID	Category	WMP § / Page	Finding	Recommendation	Severity
G-010	New Hogan OCB Plan	§5.3.3 / pp.37-38	WMP describes OCB replacements at non-HFTD substations but is silent on the New Hogan terminal OCB.	Add a statement of replacement timing or retention rationale.	Low (Observation)

H.1 Severity Summary

Critical: 0 • High: 0 • Medium: 4 • Low (Observation): 6 • Total: 10 findings.
No findings rise to the level of a Material Gap that would preclude WSAB acceptance of the 2026–2029 WMP.

H.2 Disposition

EPE recommends that MID address the four (4) Medium-severity recommendations (G-005, G-006, G-007, G-009) in the 2028 WMP Update at the latest. Items G-005, G-006, and G-007 are good candidates for the current-cycle editorial pass if MID elects to incorporate IE recommendations prior to Board adoption; G-009 is appropriately scheduled for the 2028 update with an internal decision milestone in 2027. The six (6) Observations are forward-looking enhancements rather than deficiencies.

I. Conclusion

Based on the foregoing assessment, Electric Power Engineers, LLC concludes that the Modesto Irrigation District's 2026–2029 Wildfire Mitigation Plan is comprehensive and meets the requirements of California Public Utilities Code § 8387(b)(2). The Plan reflects MID's measured risk profile (limited HFTD exposure consisting of 1.6 miles / 30 poles of the CCWD-owned, MID-operated 60kV New Hogan line in CPUC Tier 2), demonstrates continued improvement over the District's prior WMP cycles (including expansion of PRC §4292 brush clearing to all 47 New Hogan poles, completion of intrusive pole inspections of all HFTD wood poles in 2025, and the avian-protection response to the August 2025 bird-contact event), and contains a coherent program of preventive strategies, performance metrics, and corrective-action processes.
EPE identifies four (4) Recommendations and six (6) Observations for the District's consideration. No Material Gaps were identified.
EPE has discussed the findings and recommendations of this Report with MID's Electric Engineering Department and will present this Report at a duly noticed public meeting of the MID Board of Directors per PUC § 8387(c) and the scope set forth in RFP No. 24646.

Respectfully submitted,

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Appendix A — Documents Reviewed

A.1 MID Plan and Related Filings

- Modesto Irrigation District — 2026-2029 Wildfire Mitigation Plan, dated October 2, 2026 (53 pp.)
- MID 2023-2025 Wildfire Mitigation Plan — Comprehensive Update (48 pp.)
- MID 2023-2025 Wildfire Mitigation Plan — July 2024 update (48 pp.)
- MID 2023-2025 Wildfire Mitigation Plan — July 2025 update (48 pp.)
- MID 2022 Wildfire Mitigation Plan (40 pp.)
- MID 2021 Wildfire Mitigation Plan (39 pp.)
- MID Wildfire Mitigation Plan — November 2019 (33 pp.)
- MID 2023-2025 WMP Independent Evaluation (Anser Advisory Management LLC, June 2, 2023) (15 pp.)

A.2 RFI / Source Documents Provided by MID

- MID Emergency Operations Plan, February 2024 (final)
- MID Osmose Inspection Report
- New Hogan CCWD-MID Operating Agreement
- MID Operating Bulletin No. 037 — Transmission & Distribution Vegetation Management Program
- MID Operating Bulletin No. 042 — 230kV Transmission Vegetation Management Program

A.3 Procurement & Engagement Documents

- MID Request for Proposal No. 24646 — 2026-2029 Wildfire Mitigation Plan Independent Review (17 pp.)
- EPE Proposal in response to RFP No. 24646 (April 27, 2026)

A.4 Statutes and Guidance

- California Public Utilities Code § 8387 (as amended by SB 254, effective September 19, 2025)
- California Senate Bill 901 (2018); Assembly Bill 1054 (2019); Senate Bill 254 (2025)
- California Public Resources Code §§ 4291, 4292, 4293
- CPUC General Orders 95, 128, 165, 174
- NERC FAC-003 — Transmission Vegetation Management
- CAL FIRE — 2021 Power Line Fire Prevention Field Guide
- CPUC High Fire Threat District Map
- WSAB Schedule for POU and Co-op WMP Submissions (approved December 2025)
- WSAB Guidance Advisory Opinion (most recent edition applicable to MID's 2026-2029 filing)

Appendix B — Acronyms and Abbreviations

AB — Assembly Bill
ACB — Air Circuit Breaker
CAL FIRE — California Department of Forestry and Fire Protection
CCWD — Calaveras County Water District
CISA — Cybersecurity and Infrastructure Security Agency
CMUA — California Municipal Utilities Association
CPUC — California Public Utilities Commission
CUEA — California Utilities Emergency Association

EOP — Emergency Operations Plan
EPE — Electric Power Engineers, LLC
FAC — Facilities Design, Connections, and Maintenance (NERC Reliability Standards series)
FHSZ — Fire Hazard Severity Zone
GO — General Order (CPUC)
HFTD — High Fire-Threat District
IE — Independent Evaluator
IID — Imperial Irrigation District
IOU — Investor-Owned Utility
kV — Kilovolt
LLC — Limited Liability Company
MID — Modesto Irrigation District
NERC — North American Electric Reliability Corporation
OCB — Oil Circuit Breaker
P.E. — Professional Engineer
PG&E — Pacific Gas and Electric Company
PMP — Project Management Professional
POU — Publicly Owned Utility (Local Publicly Owned Electric Utility)
PRC — Public Resources Code (California)
PSPS — Public Safety Power Shutoff
PUC — Public Utilities Code (California)
PUD — Public Utility District
QA — Quality Assurance
QA/QC — Quality Assurance / Quality Control
QC — Quality Control
RFI — Request for Information
RFP — Request for Proposal
SB — Senate Bill
SMUD — Sacramento Municipal Utility District
TID — Turlock Irrigation District
VM — Vegetation Management
WEI — Western Energy Institute
WMP — Wildfire Mitigation Plan
WRMAA — Western Region Mutual Assistance Agreement
WSAB — California Wildfire Safety Advisory Board