



**Modesto Irrigation District
2026 – 2029 Wildfire Mitigation Plan**

August 18, 2026

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ACRONYMS	
AGM	Assistant General Manager
BOD	Board of Directors
CAL FIRE	California Department of Forestry and Fire Protection
CCWD	Calaveras County Water District
CPUC	California Public Utilities Commission
CUEA	California Utilities Emergency Association
FAC-003	NERC Reliability Standard: Transmission Vegetation Management Program
FHSZ	CAL FIRE Fire Hazard Severity Zone
GM	General Manager
GO	CPUC General Order
HFT / HFTD	High Fire Threat / High Fire Threat District
HHZ	High Hazard Zone
IE	Independent Evaluator
ISA	International Society of Arboriculture
kV	Kilovolt (1,000 volts)
MID	Modesto Irrigation District
MVCD	Minimum Vegetation Clearance Distance
NERC	North American Electric Reliability Corporation

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ACRONYMS	
NESC	National Electrical Safety Code
NOAA	National Oceanic and Atmospheric Administration
NWS	National Weather Service
PG&E	Pacific Gas & Electric
POU	Publicly Owned Utility
PRC	Public Resources Code
PSPS	Public Safety Power Shutoff
PUC	Public Utilities Code
QA/QC	Quality Assurance/Quality Control
QEW	Qualified Electrical Worker
RFW	Red Flag Warning – Issued by the National Weather Service when warm temperatures, very low humidity, and strong winds are forecasted and combined are expected to produce an increased risk of fire danger
USFS	United States Forest Service
WMP	Wildfire Mitigation Plan
WSAB	Wildfire Safety Advisory Board

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1. EXECUTIVE SUMMARY

At Modesto Irrigation District (MID), safety is not simply a priority—it is a fundamental responsibility. MID is committed to protecting its employees, customers, and the communities it serves by operating its electric system safely and reliably. This commitment guides every aspect of MID's operations, from daily work practices to long-term planning, with the goal of preventing injuries, protecting property, and safeguarding the environment. Safety is embedded in MID's culture and reflected in the careful planning, execution, and continuous improvement of its programs and procedures.

California's environment presents unique and evolving wildfire risks. MID's service territory is increasingly affected by extreme weather conditions, including elevated temperatures, low relative humidity, strong winds, and prolonged fire weather. These conditions increase the likelihood and potential severity of wildfires, which could threaten lives, property, natural resources, and critical electric infrastructure.

In support of its commitment to safety and regulatory compliance, MID submits its 2026–2029 Wildfire Mitigation Plan (WMP). This WMP outlines the programs, policies, and initiatives MID has implemented—or is evaluating—to reduce the risk of wildfires associated with its electrical system. It serves as a strategic roadmap to guide MID's efforts to prevent wildfire ignitions, strengthen system resilience, and respond effectively to wildfire-related risks.

MID's overarching objective is to construct, operate, and maintain its electrical facilities in a manner that minimizes the risk of wildfire ignition and mitigates potential consequences should an incident occur. Through infrastructure improvements, enhanced operational practices, and risk-informed planning, MID seeks to reduce wildfire risk, protect its customers and communities, and maintain reliable electric service.

MID is a community-owned, not-for-profit public utility governed by a locally elected five-member Board of Directors (BOD). Each director represents a geographic division within MID's service territory and is elected to serve a four-year term. The Board provides oversight and establishes policies to ensure MID fulfills its mission to safely and reliably serve its customers.

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Located in California's central valley, MID provides electric service, irrigation water, and treated drinking water. MID is committed to delivering safe, reliable, and cost-effective electric service while proactively reducing risks associated with its infrastructure, including wildfire risk. This 2026–2029 WMP builds upon MID's previous mitigation plans and continues to strengthen the resilience of electrical infrastructure located within areas designated as High Fire Threat Districts (HFTDs).

MID complies with all applicable federal, state, and regional regulations governing the design, construction, operation, and maintenance of its transmission, distribution, and substation facilities. This WMP describes the specific measures MID is implementing to meet its statutory obligation to construct, operate, and maintain its electrical lines and equipment in a manner that minimizes wildfire risk within the HFTD.

2. OVERVIEW OF THE WILDFIRE MITIGATION PLAN

This WMP describes the programs, operational practices, and system improvements MID is implementing or evaluating to reduce the risk of its electrical assets igniting or contributing to catastrophic wildfires. The 2026–2029 WMP builds upon prior mitigation efforts and reflects MID's ongoing commitment to continuous improvement, risk reduction, and regulatory compliance.

MID developed this WMP to support its statutory obligations under California Public Utilities Code (PUC) Section 8387(a) and to demonstrate its systematic approach to wildfire risk management. The WMP identifies key mitigation strategies, outlines program objectives, and establishes a framework for ongoing evaluation and enhancement of MID's wildfire mitigation efforts.

2.1 Objectives of the Wildfire Mitigation Plan

This WMP provides a comprehensive overview of MID's wildfire mitigation programs and initiatives designed to minimize the risk that its owned or operated electrical facilities could

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ignite or contribute to a catastrophic wildfire. MID’s wildfire mitigation strategy is guided by its statutory obligation under California PUC Section 8387(a), which requires that:

“Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.”

Consistent with this requirement, the primary objective of this WMP is to describe the actions MID is taking to reduce wildfire risk associated with its electrical system. MID has complied annually with its obligation to prepare and submit a wildfire mitigation plan pursuant to PUC Section 8387(b)(1), and this 2026–2029 WMP continues that commitment.

Following public review and comment, this WMP will be presented for final approval by MID’s BOD after which it will be submitted to the California Wildfire Safety Advisory Board (WSAB).

2.2 Statutory Cross-Reference Table

California Senate Bill 254 (2025) amended California PUC § 8387, effective September 19, 2025. The most significant revision is to § 8387(b)(1), which changes the WMP filing frequency from annually to at least once every four years, on a schedule determined by the California WSAB.

MID’s 2026–2029 WMP complies with all applicable PUC § 8387 requirements, as summarized in Table 1. The table also identifies the specific sections of this WMP where each statutory requirement is addressed.

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Table 1: PUC § 8387 – Statutory Requirements Checklist

PUC § 8387	Compliance Requirements and Corresponding Plan Sections	Plan Section
(a)	Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.	
(b)(1)	The local publicly owned electric utility or electrical cooperative shall, before January 1, 2020, prepare a wildfire mitigation plan. After January 1, 2026, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan and shall submit the plan to the California Wildfire Safety Advisory Board at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board.	
(b)(2)	The wildfire mitigation plan shall consider as necessary, at minimum, all of the following:	
(b)(2)(A)	An accounting of the responsibilities of persons responsible for executing the plan.	3.2
(b)(2)(B)	The objectives of the wildfire mitigation plan.	2.4 , 2.5 and 2.6
(b)(2)(C)	A description of the preventative strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	5
(b)(2)(D)	A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to measure and track the implementation of the plan and the assumptions that underlie the use of those metrics.	7
(b)(2)(E)	A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	7.5

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PUC § 8387	Compliance Requirements and Corresponding Plan Sections	Plan Section
(b)(2)(F)	Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, and protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	5.7 and 5.8
(b)(2)(G)	Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential de-energization for a given event.	5.8.1 5.8.2 6
(b)(2)(H)	Plans for vegetation management.	5.4
(b)(2)(I)	Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	5.5
(b)(2)(J)	A list that identifies describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited, to both of the following:	4
(b)(2)(J)(i)	Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities.	4.7
(b)(2)(J)(ii)	Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	4.2

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PUC § 8387	Compliance Requirements and Corresponding Plan Sections	Plan Section
(b)(2)(K)	Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high-fire threat district based on new information or changes to the environment.	<u>4.8</u> <u>4.9</u> <u>4.10</u>
(b)(2)(L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.	<u>4</u>
(b)(2)(M)	A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	<u>5.8.3</u>
(b)(2)(N)	A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:	
(b)(2)(N)(i)	Monitor and audit the implementation of the wildfire mitigation plan.	<u>7.3</u>
(b)(2)(N)(ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.	<u>7.4</u>
(b)(2)(N)(iii)	Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.	<u>5.4.2.5</u>
(3)	In each year it is required to submit a plan, the local publicly owned electric utility or electrical cooperative shall present its wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.	<u>3.3</u>

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PUC § 8387	Compliance Requirements and Corresponding Plan Sections	Plan Section
(3)(c)	The 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.	<u>8</u>

2.3 Utility Overview and Context Setting Table

MID is a California irrigation district organized in 1887 under the California Water Code. Under this authority, MID provides irrigation water and electric service within its service territory. MID also has the authority to exercise eminent domain, enter into contracts, construct infrastructure, establish rates and charges for commodities or services furnished, lease property, and incur indebtedness.

MID began providing electric service in 1923. Its service territory is in the San Joaquin Valley of Central California, approximately 90 miles east of San Francisco. In 2025, MID recorded total retail sales of approximately 2.6 billion kilowatt-hours (kWh) and a peak demand of 760 megawatts (MW).

MID owns, operates, and maintains transmission, distribution, and generation assets. MID also purchases and sells power and transmission services and participates in power pooling and other utility coordination arrangements.

MID provides electric service across approximately 560 square miles in portions of San Joaquin, Stanislaus, and Tuolumne counties, as authorized by the California Water Code and other relevant law. This includes its traditional service area in the Modesto area of Stanislaus

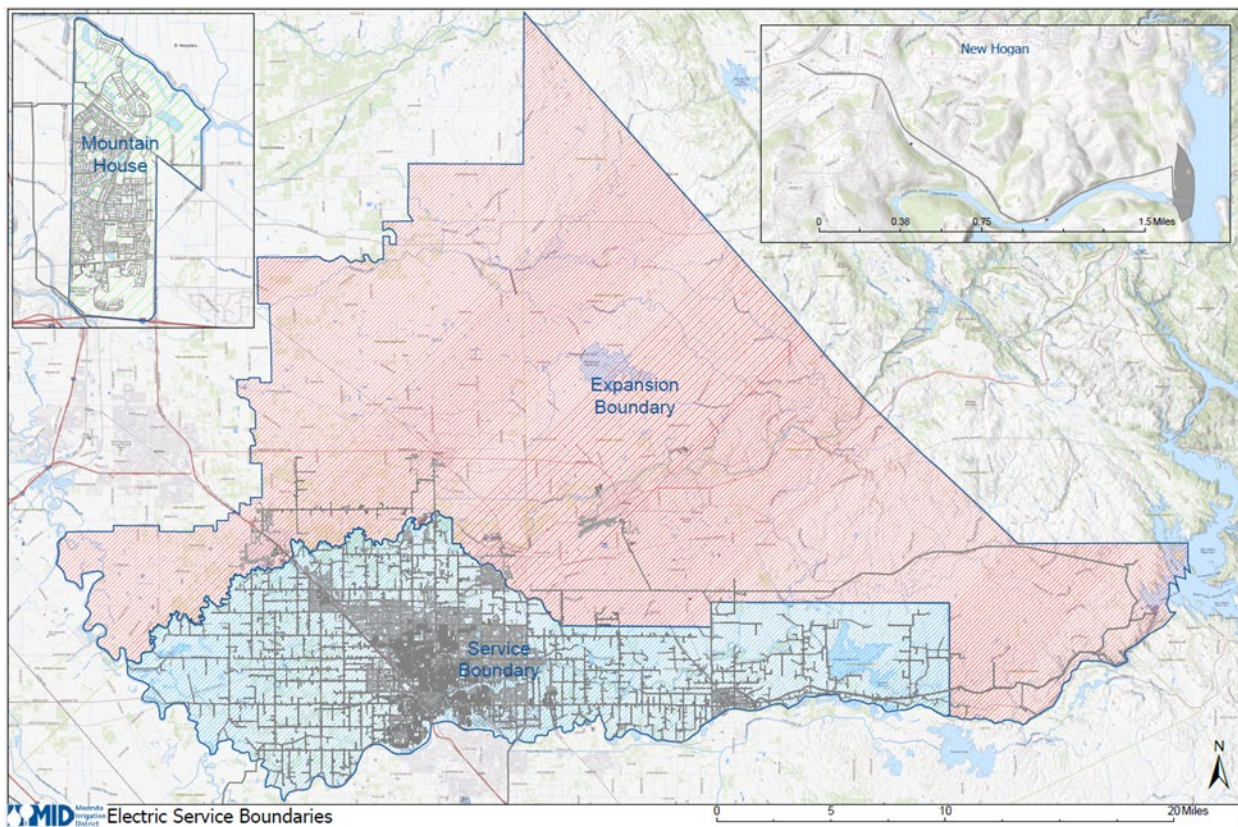
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and Tuolumne counties, and the City of Mountain House (see Figure 2) in San Joaquin County, an area of approximately eight square miles.

Most of MID's service territory is relatively flat, with an average elevation of less than 100 feet above sea level. Areas to the east and west transition to gently rolling terrain with low-growing vegetation. Three waterways – Dry Creek, the Tuolumne River, and the Stanislaus River – traverse the broader service region.

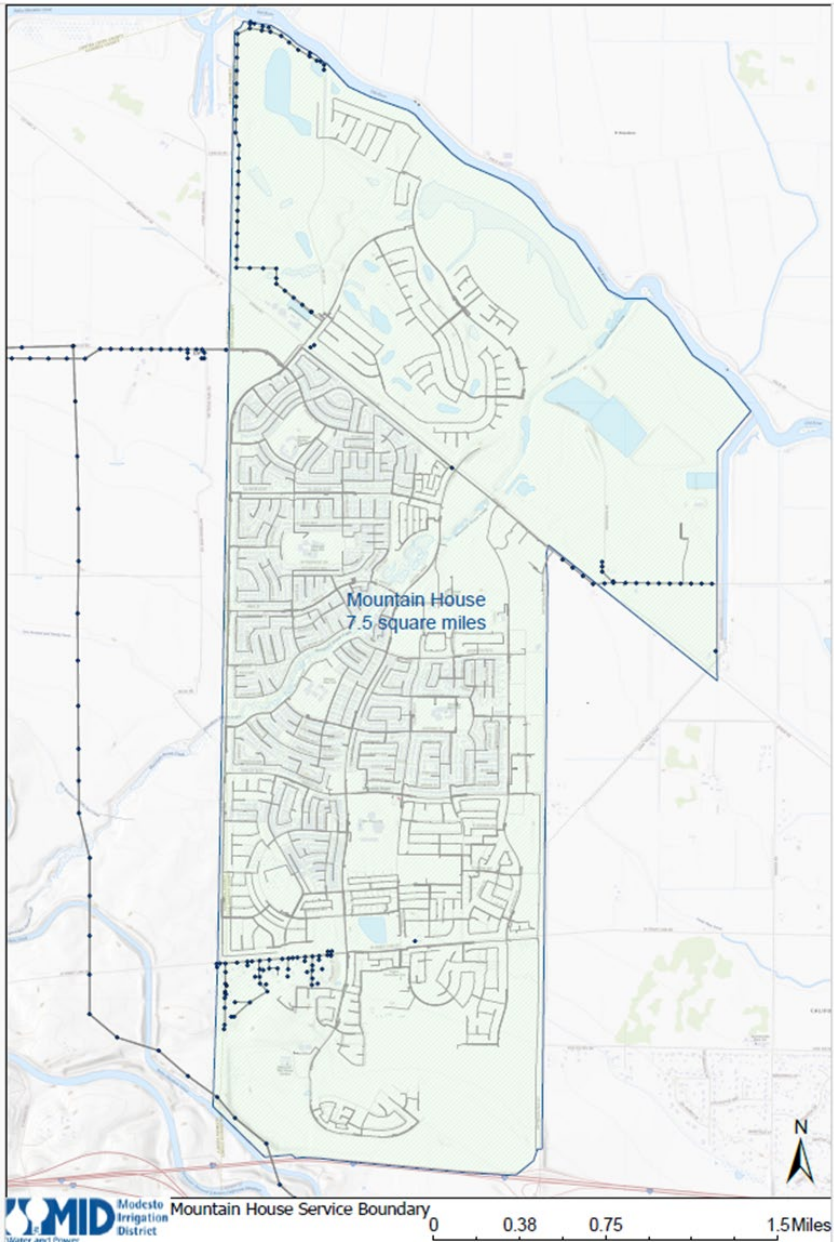
MID may also serve customers within separate joint electric service areas shared with other utilities. Some of these joint service areas are within MID's Expansion Boundary (see Figure 1). In these areas, each utility owns, operates, and maintains its respective infrastructure independently. Where MID is the electric service provider, it does not rely on another utility's infrastructure to serve customer load, and MID customers are not affected by another utility's Public Safety Power Shutoff (PSPS) events.

Figure 1: Modesto Irrigation District Service Territory with Expansion Boundary



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Figure 2: City of Mountain House



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Figure 3: 60kV New Hogan Line

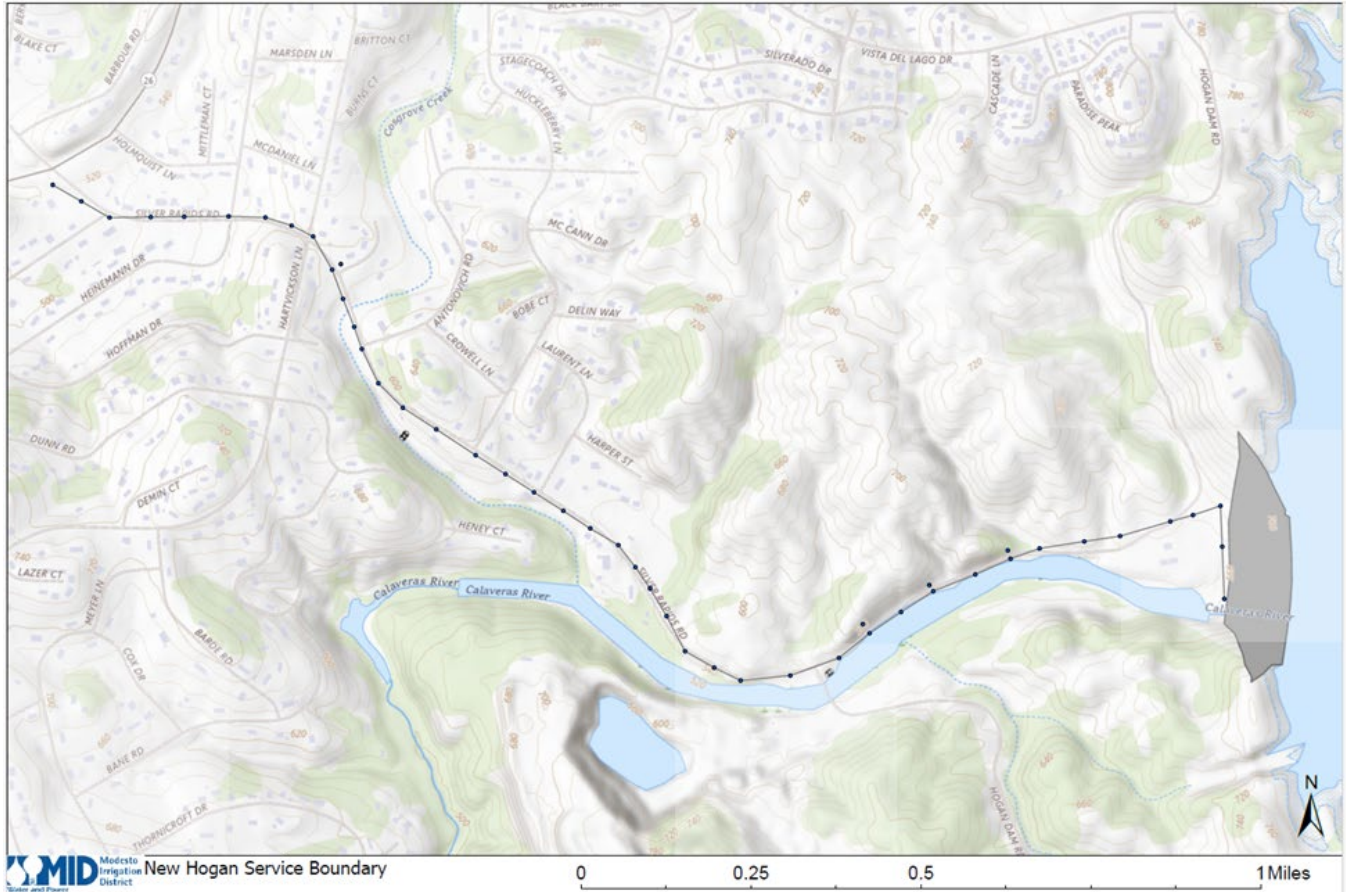


Table 2 below includes the Context Setting Table for MID and provides detailed information regarding MID's assets, resources, and general service area.

Table 2: Context Setting Table

Utility Name	Modesto Irrigation District (MID)
Service Territory Size	~560 square miles
Owned Assets	Transmission ~400 line miles Distribution ~2010 line miles Generation (14 units / Total Capacity ~470 MW)
Number of Accounts Served	~134,500
Population Within Service Territory	~300,000

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Utility Name	Modesto Irrigation District (MID)	
Customer Class Makeup	Number of Accounts	Share of Total Load (MWh)
	77.80% Residential	38.3% Residential
	9.85% Commercial	25.8% Commercial
	0.11% Industrial	30.5% Industrial
	12.24% Other	5.3% Other
Service Territory Location/ Topography	86.45% Agriculture 0.32% Barren/Other 0.25% Hardwood Forest 3.03% Hardwood Woodland 7.60% Urban 2.27% Water	
Service Territory Wildland Urban Interface (based on total area)	0.54% Wildland Urban Interface 2.02% Wildland Urban Intermix	
Percent of Service Territory in CPUC HFTD (based on total area)	Tier 2: 0% Tier 3: 0%	
Miles of Owned Lines Underground and/or Overhead (Total Systemwide Line Miles)	Overhead Distribution: ~ 1,080 miles Overhead Transmission: ~ 400 miles Underground Distribution: ~ 888 miles Underground Transmission: ~ 0 miles	
	Explanatory Note 1 – Description of Unique Ownership Circumstances: A portion of 230kV ~23.5% of the transmission line miles is jointly owned (MID & Turlock Irrigation District)	
	Explanatory Note 2 – Additional Relevant Context: ~4.5% of lines are located outside the service territory	
Miles of Overhead Lines Owned by CCWD and Strictly Operated and Maintained by MID	Overhead Transmission: ~2.3 line miles	
	Explanatory Note 1 – Additional Relevant Context: ~1.5% of lines are located outside the service territory. This line is New Hogan and is maintained by MID but not owned by MID.	

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Utility Name	Modesto Irrigation District (MID)
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%
	Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)
	Tier 2: ~0.4% Tier 3: 0%
Have customers ever lost service due to an IOU PSPS event?	No
Have customers ever been notified of a potential loss of service due to a forecasted IOU PSPS event?	No
Have protocols been developed to pre-emptively shut off electricity in response to elevated wildfire risks?	Yes, for the 60kV New Hogan line in the HFTD connecting a small hydro generator. Does not impact MID's customers. (See Figure 3)
Has electricity previously, since 2019, pre-emptively been shut off in response to elevated wildfire risk?	No Data for the calendar year 2025: Number of shut-off events: 0 Customer accounts that lost service for >10 minutes: 0 For prior response, average duration before service restored: 0

2.4 Minimizing Sources of Ignition

MID's WMP outlines wildfire mitigation strategies applicable to Calaveras County Water District (CCWD)-owned but MID-operated assets within the HFTD. MID has limited exposure within the HFTD, with only 1.6 miles of operated and maintained overhead 60kV transmission line located in a Tier 2 fire-threat area and no distribution assets in or adjacent to the HFTD.

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The primary goal of this WMP is to minimize the probability that MID's operated transmission facilities could ignite or contribute to a wildfire. MID has evaluated prudent and cost-effective improvements to its infrastructure, operations, and training programs and has implemented appropriate mitigation measures. MID will continue to evaluate additional tools, technologies, and industry best practices and implement improvements as appropriate through its continuous improvement process.

2.5 Improving Grid Reliability and Resiliency

The programs described in this WMP are designed to enhance the reliability and resiliency of MID's electrical assets, including those operated and located within the HFTD. As part of this WMP development, MID evaluated industry practices and emerging technologies to reduce the likelihood of service disruptions and improve restoration capabilities.

MID routinely evaluates mitigation programs, including grid hardening and vegetation management, to determine whether enhancements could further reduce wildfire risk while improving reliability and resiliency. Based on this evaluation, MID has determined that its assets within the HFTD present a very low wildfire ignition risk. MID will continue to evaluate wildfire risk and asset performance annually and implement improvements where warranted.

2.6 Measuring Plan Effectiveness

Evaluating the effectiveness of MID's wildfire mitigation programs is essential to ensuring the WMP achieves its intended objectives. MID monitors key performance indicators, including equipment failures and vegetation-related incidents, to assess program effectiveness.

MID will use this information to identify trends, evaluate mitigation effectiveness, and implement improvements as needed to enhance system safety, reliability, and resiliency. MID will also evaluate whether alternative mitigation measures could achieve equal or greater wildfire risk reduction in a more cost-effective manner.

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3. ROLES AND RESPONSIBILITIES

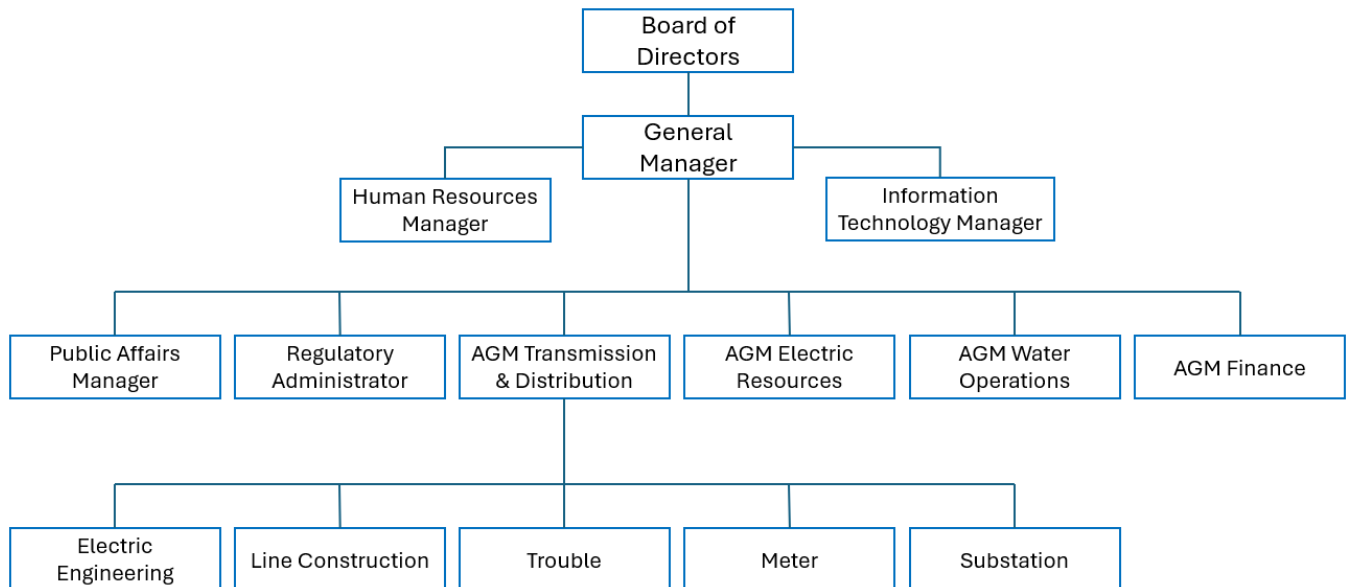
This section identifies the MID management staff responsible for the development, approval, and implementation of this WMP and lists the operating departments accountable for carrying out the various activities described.

3.1 Organizational Chart

MID's BOD appoints the General Manager (GM), who reports to the Board and has overall responsibility for MID operations. Eight managers report to the GM, including the Assistant General Manager (AGM) of Transmission & Distribution (T&D) and the AGM of Electric Resources (see Figure 4).

Departments within the T&D Division – including Electric Engineering, Line Construction, Trouble, Meter, and Substation – play key roles in implementing wildfire mitigation measures and reducing the risk of wildfire ignition associated with MID-owned or operated facilities.

Figure 4: MID Organizational Chart



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3.2 MID Wildfire Mitigation Plan Responsibilities

The GM has overall accountability for the WMP. The AGM of T&D is responsible for implementation of the WMP. Table 3 identifies the department or activity owner responsible for each mitigation measure.

Table 3: WMP Program Responsibility

Activity	Responsible Person/Title
T&D Line Asset Inspections	Trouble Supervisor
Substation Inspections and Maintenance	Substation Supervisor
T&D Line Maintenance	Line Construction Manager
T&D Line Vegetation Inspections	Trouble Supervisor
Substation Vegetation Inspections and Management	Substation Supervisor
WMP Updates	Electrical Engineering Manager
Communications	Power Operations Supervisor and Public Affairs Specialist
Governmental Liaison	Regulatory Analyst
WMP Review	GM and AGM T&D
WMP Implementation	AGM T&D
WMP Final Approval	Board of Directors

MID utility staff have the following responsibilities regarding fire prevention, response, and investigation:

- Conduct work in a manner that will minimize the risk of ignition for a utility-caused wildfire.
- Take all reasonable and practicable actions to prevent and suppress fires resulting from MID electric facilities.
- Coordinate with local, state, and federal fire management personnel to ensure that appropriate preventative measures are in place.

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- When made aware of a fire caused by MID assets immediately report the incident to the Authority Having Jurisdiction (AHJ) (i.e., CAL FIRE, U.S. Forest Service (USFS), local fire department, etc.) pursuant to specified procedures.
- Take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.
- Ensure compliance with relevant federal, state, and industry standard requirements.
- Ensure that relevant incident data is appropriately and timely collected and preserved when MID facilities are suspected of igniting or contributing to a wildfire.
- Maintain adequate fire mitigation training programs for all relevant employees and, as applicable, publicly owned utility (POU) contractors.

3.3 WMP Adoption Process

The MID Electric Engineering department is responsible for updating the WMP in compliance with PUC § 8387 and submitting the WMP to the WSAB per the “2026-2029 Wildfire Mitigation Plan Schedule for Publicly Owned Utilities and Electrical Cooperatives”¹ approved in December 2025.

Table 4: 2026 – 2029 MID WMP Due Dates

Early Collaborative Exchanges	Final Due Date
March 30-June 19, 2026	October 2, 2026 (Requires Independent Evaluator Report per PUC § 8387(3)(c))
April 3-June 23, 2028	October 6, 2028

¹ <https://energysafety.ca.gov/wp-content/uploads/2025/12/schedule-for-pou-and-co-op-wmp-submissions-working-version-approved-dec-2025.pdf>

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MID Electric Engineering will provide the AGM T&D with a final draft of the revised WMP for review. After review by the AGM T&D, the draft WMP will be approved as follows:

For October 2, 2026, filing:

- MID retains an Independent Evaluator (IE) who provides a report on the overall comprehensiveness of the WMP.
- MID makes the WMP available for public comment and incorporates recommendations if approved by MID.
- IE presents the report at a public meeting of the MID BOD.
- MID BOD (approve / ratify) the WMP.
- MID submits final approved WMP and IE report to the WSAB.
- MID posts the WMP and IE report on the MID public website (<https://www.mid.org/outages-safety/safety/wildfire-safety/>).

For October 6, 2028, filing:

- MID makes the WMP available for public comment and incorporates recommendations if approved by MID.
- MID AGM/GM approves WMP (proxy for BOD).
- MID submits final WMP to the WSAB.
- MID posts the WMP on the MID public website.

3.4 Description of Where WMP Information Can be Found on Utility Website

The updated MID WMP and each IE report along with relevant information, will be posted on the MID public-facing website. Here, the public can also view MID's previous WMPs and IE report(s).

4. WILDFIRE RISKS AND RISK DRIVERS

The Office of Energy Infrastructure Safety (OEIS) defines risk as “a measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard

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occurring.” This section lists the wildfire risks and risk drivers associated with CCWD-owned but MID-operated and maintained assets within the HFTD.

4.1 Enterprise-Wide Safety Risks

MID’s risk evaluation process incorporates institutional knowledge and historical operating experience. MID’s mitigation programs align with applicable regulatory requirements and industry standards, including CPUC General Orders, North American Electric Reliability Corporation (NERC) Reliability Standards, National Electrical Safety Code (NESC), and industry best practices.

4.2 Topographic and Climatological Risk Drivers

MID’s topographic and climatological wildfire risk exposure is limited; however, MID monitors the following potential risk factors:

- Extended drought,
- Lack of early fall rains,
- Hot temperatures,
- High winds, and
- Vegetation type and density.

Adverse weather conditions, specifically critical fire weather events, pose very little risk to MID electrical assets in the HFTD. MID’s service territory is subject to hot temperatures during the summer months but historically does not experience strong damaging winds. The MID service area is subject to Red Flag Warnings (RFW), however most of the MID service territory is in the valley where most of the vegetation is frequently irrigated crops.

MID referenced the City of Modesto *2022 Climate Change Vulnerability Assessment*² to evaluate potential climate change impacts to the MID service territory and MID assets.

² https://gp2050.modestogov.com/wp-content/uploads/2022/06/Modesto-VulnerabilityAssessment-Final_June-2022.pdf

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4.3 Extended Drought

MID service area has experienced periodic drought conditions. While drought can increase wildfire risk, MID's limited operated infrastructure within the HFTD results in a very low likelihood that MID-operated facilities would ignite or contribute to a catastrophic wildfire.

4.4 Extreme Heat

The City of Modesto *2022 Climate Change Vulnerability Assessment* states that "Extreme heat occurs when temperatures rise significantly above normal levels. In Modesto, an extreme heat day occurs when temperatures reach above 102.9 degrees Fahrenheit (°F). As shown in the city's Assessment, the number of extreme heat days in Modesto is projected to increase from four days historically to an average 22 extreme heat days per year by midcentury and an average of 42 extreme heat days per year by the end of the century."³

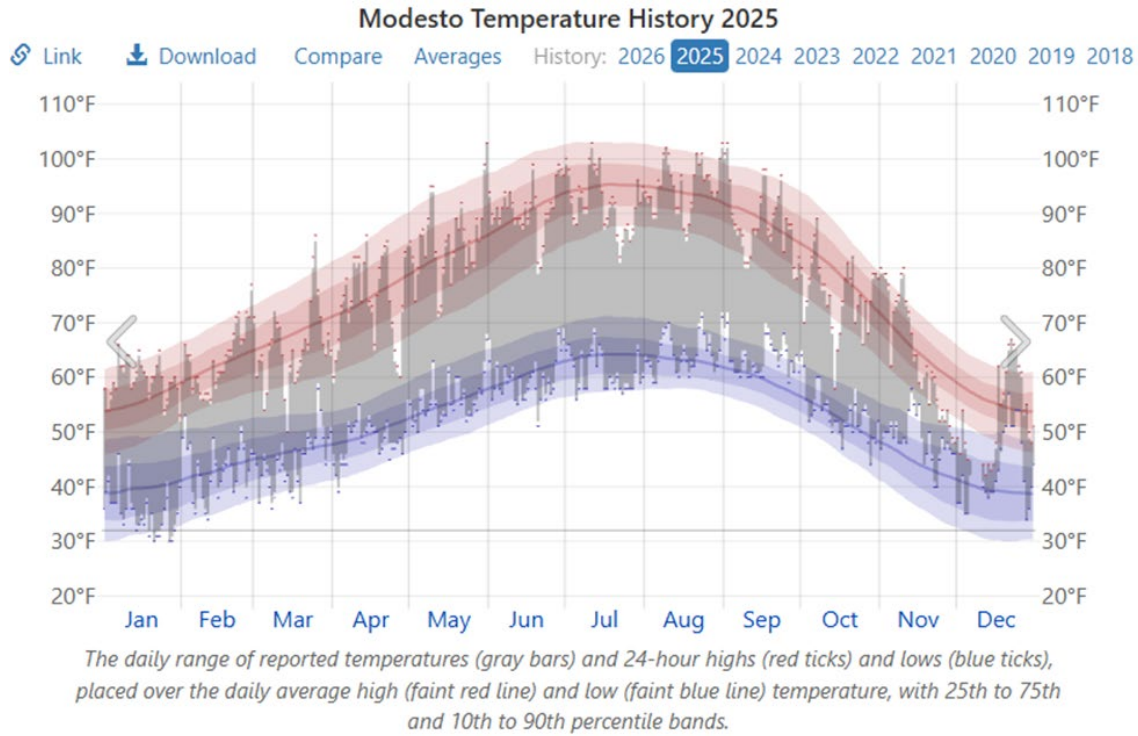
Figure 5 below shows the daily temperatures in Modesto in 2025. The hottest temperature in 2025 was 108 degrees recorded on July 6 and July 11.⁴

³ https://gp2050.modestogov.com/wp-content/uploads/2022/06/Modesto-VulnerabilityAssessment-Final_June-2022.pdf

⁴ <https://weatherspark.com/h/y/1325/2025/Historical-Weather-during-2025-in-Modesto-California-United-States#Figures-WindSpeed>

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Figure 5: Modesto Temperature History



4.5 High Winds

Average sustained wind speed throughout the Modesto region varied throughout 2025 from 5.7 to 8.5 miles per hour. The average wind speed and direction collected from Modesto Airport is stated below.

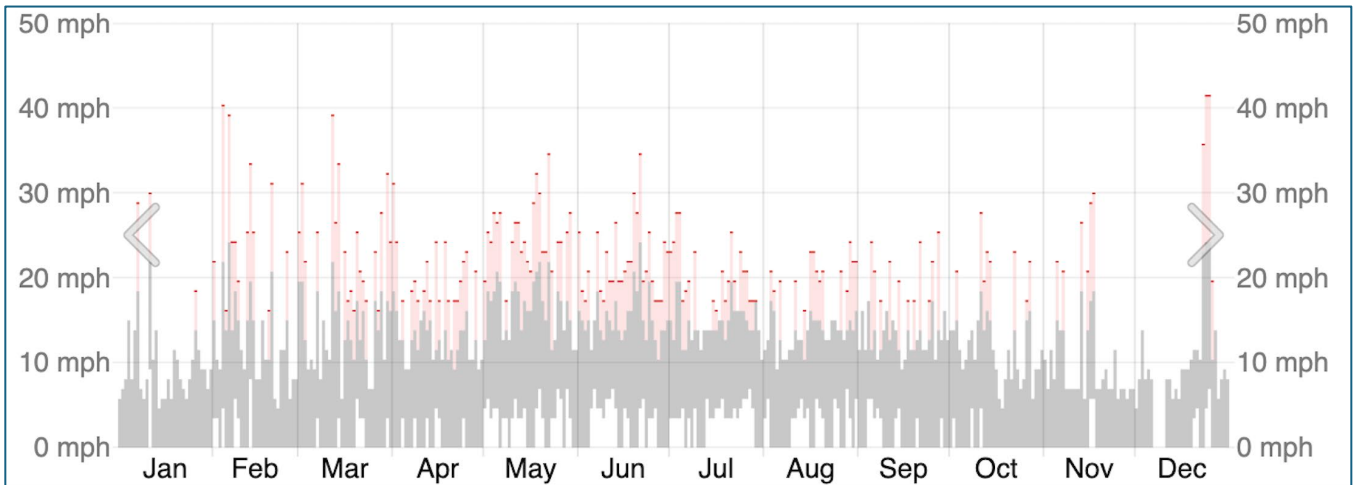
Table 5: Reported Average Wind Speeds and Direction, 2025

Month		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
Wind	Speed	5.7	6.2	6.5	7.2	8.0	8.5	8.1	7.4	6.5	5.7	5.7	5.9	7.3
	Direction	SE	SE	NW	NW	NW	NW	NNW	NNW	NW	NW	NW	SE	NW

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Figure 6 below displays the reported sustained wind speeds and maximum wind gust throughout 2025 in the Modesto region. The highest wind gust reported at approximately 40 mph.

Figure 6: Wind Speed in 2025 in Modesto⁵



4.6 Climate Change

The National Oceanic and Atmospheric Administration (NOAA) describes climate change as “any significant change in the measures of climate for extended periods of time, usually over decades or longer. This includes major, long-term changes in temperature, precipitation, humidity, ocean heat, wind patterns, sea level, sea ice extent, and other factors, and how these changes affect life on Earth.”⁶

NOAA also states that “Global temperatures rose about 1.98°F (1.1°C) from 1901 to 2020, but climate change refers to more than an increase in temperature. It also includes sea level rise, changes in weather patterns like drought and flooding, and much more. Things that we depend upon and value — water, energy, transportation, wildlife,

⁵ <https://weatherspark.com/h/y/1325/2025/Historical-Weather-during-2025-in-Modesto-California-United-States#Figures-WindSpeed>

⁶ <https://www.noaa.gov/explainers/what-s-difference-between-climate-and-weather>

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agriculture, ecosystems, and human health — are experiencing the effects of a changing climate”.

In June 2022 the City of Modesto published the “Modesto 2050 General Plan Update and Environmental Impact Report, Final Technical Memorandum: Climate Change Vulnerability Assessment” report.⁷ The assessment looked at climate change hazards, agricultural and ecosystem pests, air quality, drought, extreme heat, flooding, human health hazards, landslides, and severe weather.

In conclusion, the study “identifies which hazards are expected to harm sensitive populations and assets, and which assets are most vulnerable to various hazards that are projected to intensify with climate change. The effects of climate change that are expected to have the largest impacts on Modesto’s communities, infrastructure, buildings, activities, ecosystems, and services are extreme heat, flooding, and severe weather.”

There were 17 different infrastructure assets evaluated that provide various services to the Modesto community. MID has identified six risks that are of specific interest:

1. Electrical substations and transmission lines, as mapped by the California Energy Commission and California Office of Emergency Services.
2. Power plants, including McClure Generation Station and Stone Drop Mini-Hydro.
3. Dams and reservoirs, including Don Pedro Dam, New Melones Dam, New Exchequer Dam, La Grange Dam, Hetch-Hetchy Reservoir, Modesto Reservoir, and Turlock Lake.
4. Electric vehicle charging stations.
5. Communication facilities, including television and radio antennae and Internet lines, as mapped by the California Office of Emergency Services.
6. Evacuation routes and single access roads.

⁷ https://gp2050.modestogov.com/wp-content/uploads/2022/06/Modesto-VulnerabilityAssessment-Final_June-2022.pdf

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During the 2026-2029 WMP cycle MID will evaluate the conclusions of this report to determine what impact these projected climate change risks may have on MID operations and evaluate possible changes to reduce MID's fire risk potential, if any identified, in the region and develop an action plan to mitigate any potential increase in risk.

4.7 Risks and Risk Drivers Associated with Design, Construction, Operations, and Maintenance

MID has very minimal overhead line exposure within the CPUC HFTD. As described below, a small section of the CCWD-owned 60kV New Hogan line is the only MID-operated and maintained asset within the HFTD.

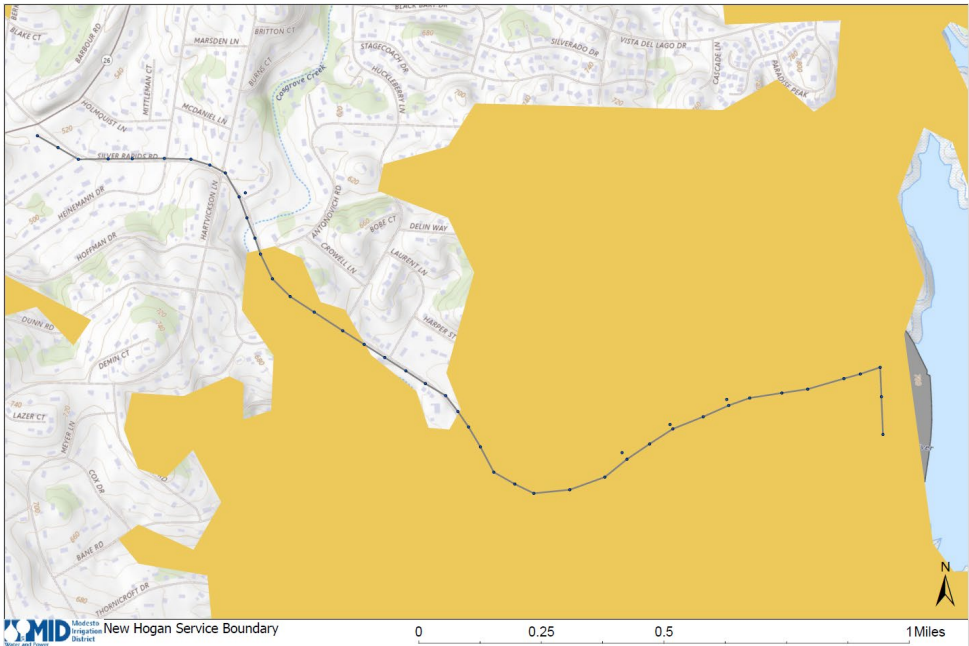
The CCWD-owned 60kV New Hogan transmission line is a tap line that interconnects with PG&E's 60kV Valley Springs #1 line (Figure 8). MID does not own but does operate and maintain the 2.2 miles (47 poles, all contiguous) of the overhead electrical infrastructure; 1.6 miles – 30 poles – of this tap line is within a Tier 2 fire threat area. The MID-operated section of the 60kV New Hogan transmission line runs from the New Hogan Powerhouse along Silver Rapids Road to Highway 26 in the community of Valley Springs, California (Figure 7), where it interconnects to the PG&E system at a line switch. All terrain is below 700 feet elevation. MID evaluates risk events system-wide, to identify cause trends and consequences of those risk events and to determine if construction, maintenance, and/or operational changes should be considered, including to the 60kV New Hogan line and, based on this evaluation, MID has determined that its operated and maintained electrical assets in the HFTD are very low risk for igniting or contributing to a catastrophic wildfire.

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Figure 7: Aerial View of Valley Springs Community



Figure 8: New Hogan Line – MID Facilities in CPUC HFTD



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4.8 High Fire Threat District (HFTD)

MID participated in the development of the CPUC's Fire-Threat Map (Figure 9),⁸ which is one part of the HFTD. The HFTD is made up of two maps:

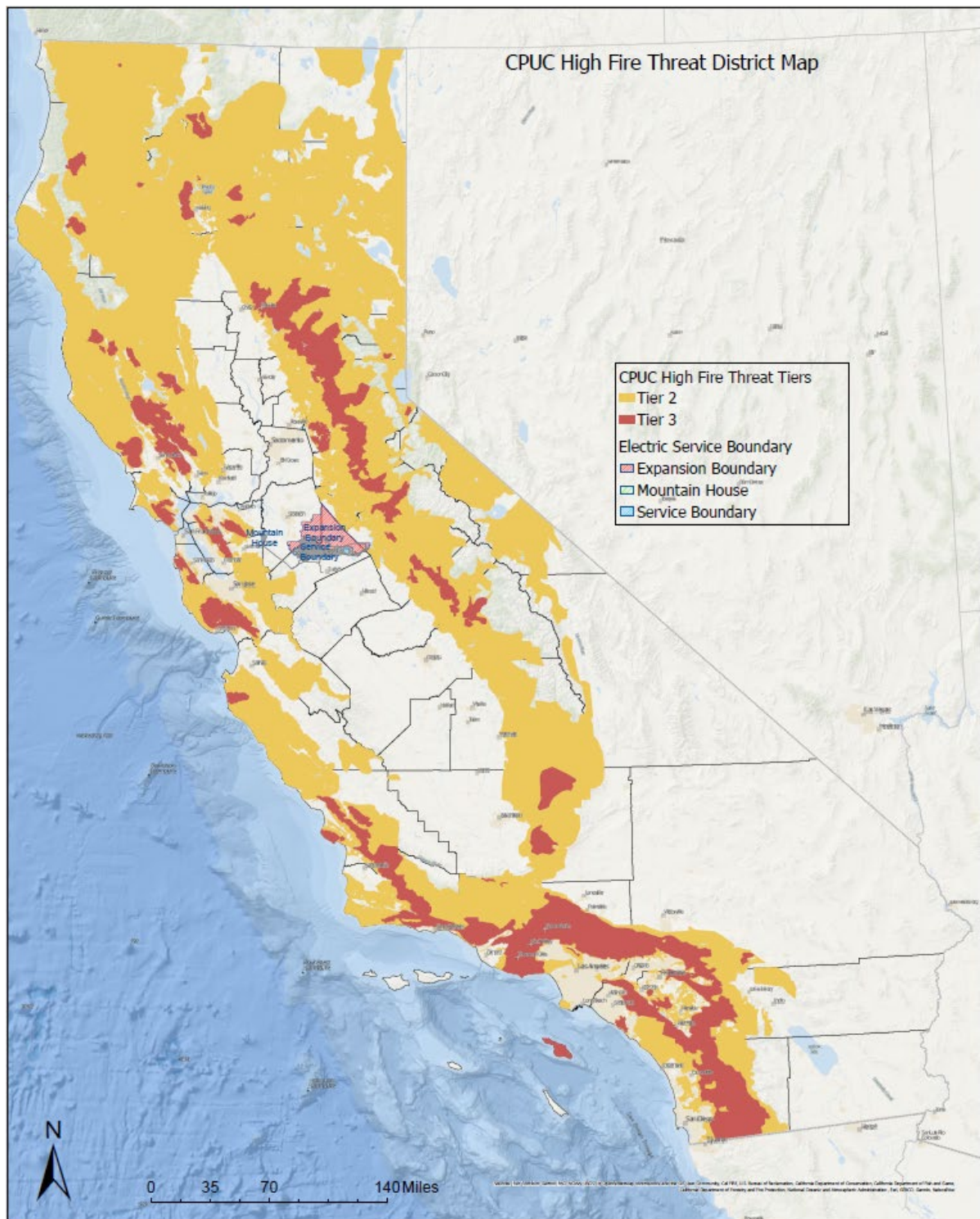
1. Tier 1 High Hazard Zones (HHZs) on the USFS-CAL FIRE joint map of Tree Mortality HHZs ("Tree Mortality HHZ Map").
 - a. The Tree Mortality HHZ Map is an off-the-shelf map. Tier 1 HHZs are zones near communities, roads, and utility lines, and are a direct threat to public safety.
2. Tier 2 and Tier 3 fire-threat areas on the CPUC Fire-Threat Map.
 - a. Tier 2 fire-threat areas outline areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility-related wildfires.
 - b. Tier 3 fire-threat areas outline areas where there is an extreme risk (including likelihood and potential impacts on people and property) from utility-related wildfires.

In the map development process, MID reviewed the proposed boundaries of the fire-threat areas and confirmed that, based on local conditions and historical fire data, all of MID's service territory was properly excluded from the HFTD; MID's entire service territory is located outside of the HFTD. The 60kV New Hogan line is the only MID-operated and maintained asset located within the Tier 2 fire-threat area.

MID has incorporated HFTD procedures into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

⁸ <https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking>

Figure 9: CPUC High Fire Threat District Map



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4.9 Changes to CPUC HFTD

MID-operated electrical assets pose a very low wildfire ignition risk, with only 1.6 miles of line in a Tier 2 fire-threat area. MID concurs with the existing HFTD boundaries and does not recommend changes to the HFTD boundaries as currently established.

4.10 Fire Hazard Severity Zones

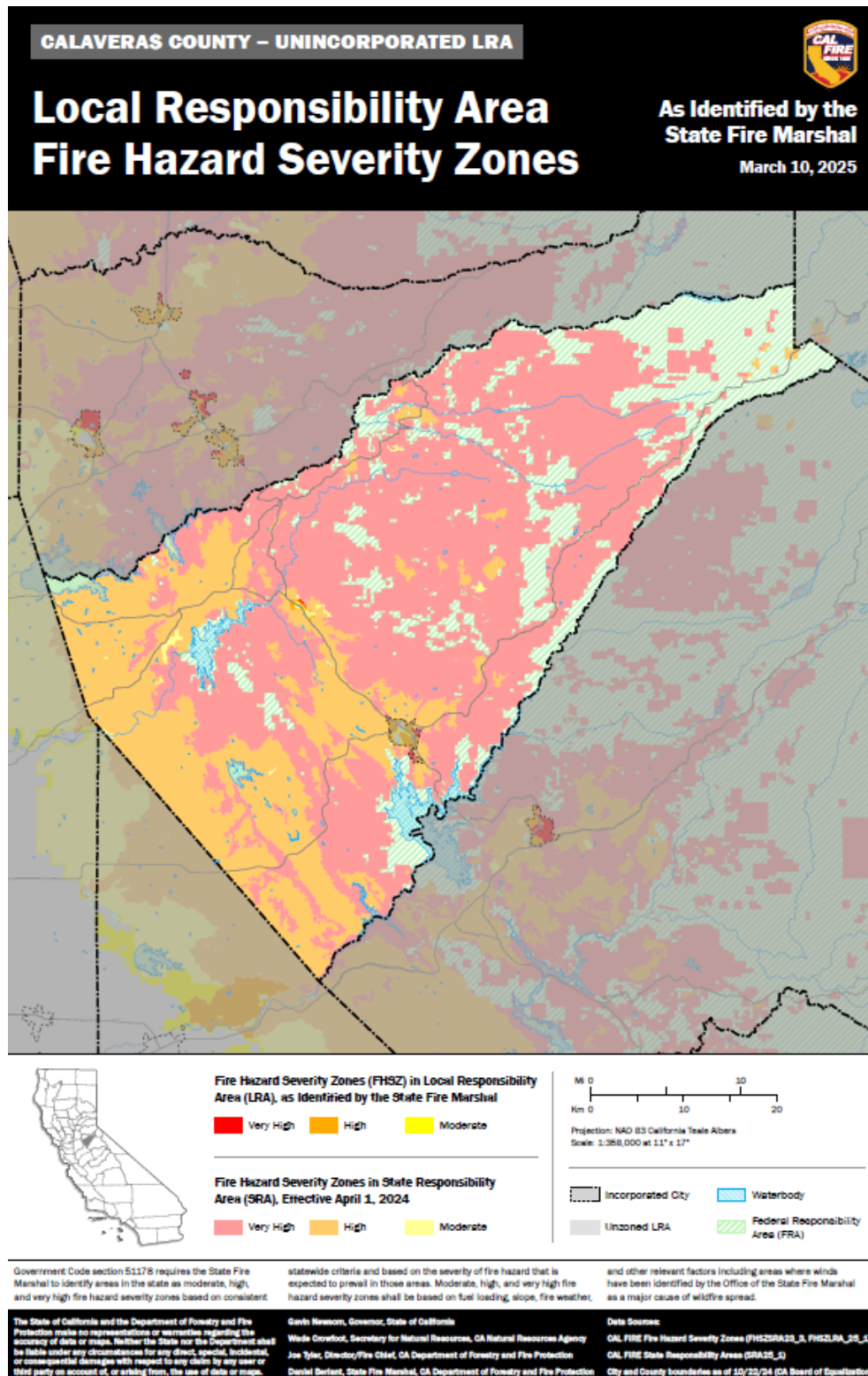
MID evaluated the CAL FIRE Fire Hazard Severity Zone (FHSZ) map within Calaveras County, the only location where MID-operated electrical assets are within a Tier 2 HFTD and found no additional risk exposure (Figures 10 & 11).

CAL FIRE FHSZ maps are developed from a geospatial model that is designed to describe relative wildland and urban-interface fire hazard potential over the long-term for all areas of the state. FHSZ maps evaluate “hazard,” not “risk.”⁹

⁹ <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>

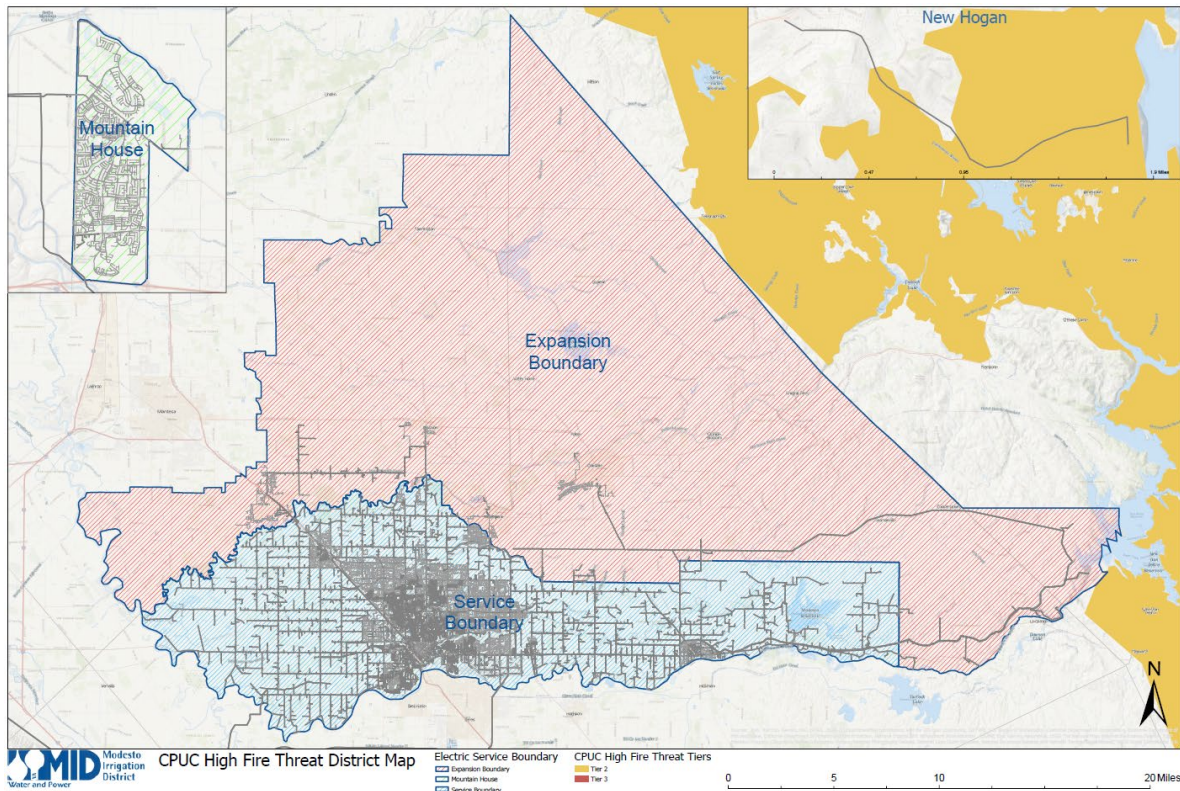
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Figure 10: Calaveras County FHSZ Map



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Figure 11: California HFTD and MID Service Areas



5. MITIGATION STRATEGIES

MID's wildfire mitigation strategies are described below:

5.1 Situational Awareness

MID does not have a meteorologist on staff. MID owns one weather station but staff monitor publicly available weather information that could impact the MID service territory.

The MID operations department receives a "Weather Threat Briefing" situation report prepared by the California State Warning Center and issued by the California Office of Emergency Services.¹⁰ The report is issued during periods of increased wildfire risk and provides information including (not all inclusive):

¹⁰ Adopted by CPUC Decision 17-12-024;
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M200/K976/200976667.PDF>

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- Weather Risk Outlook for the day and a 7-day outlook,
- A narrative on significant weather conditions,
- Weather Outlook (6-14 days),
- Statewide wildfire risk potential,
- Weekly fire potential and weather forecast,
- Weather map & watches / warnings,
- PSPS Summary/Status for PG&E, SCE, SDG&E, Liberty Utilities, and
- Cal OES Fire Preparedness Levels and Fire Activity.

MID reviews the Weather Threat Briefing report for any approaching severe weather events including RFWs issued for Fire Weather Zone CAZ 219, which covers the MID service territory including the City of Mountain House and the area where the 60kV New Hogan line is located.

RFWs are issued by the National Weather Service and wildfire alerts are provided by local news media or the fire agency having jurisdiction of the incident.

MID does not assign different operating conditions based on current or forecasted weather. MID is still evaluating adopting the WSAB-recommended operating conditions and will report back in the 2028 WMP Update.

5.2 Design and Construction Standards

MID's electric facilities, throughout the entire service territory, are designed and constructed to meet or exceed the CPUC GO 95, the National Electric Safety Code (NESC), and the Institute of Electrical and Electronics Engineers (IEEE) standards.

MID continuously evaluates and, if necessary, makes modifications to existing equipment design to reduce the risk of MID asset failure. MID's current design and construction standards are applicable to the operated and maintained assets in the Tier 2 fire threat area and do not require changes specific to fire risk mitigation.

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5.3 Grid Hardening

MID evaluates grid hardening opportunities to improve safety and reliability. Based on current risk assessments, the following mitigation measures apply to MID-operated and maintained facilities within the HFTD:

5.3.1 Wood Pole Replacement

Routine inspections of operated and maintained assets within the HFTD have not identified any poles that need replacing at this time.

5.3.2 Avian Protection

Risk events caused by bird contact can result in the ignition of a fire. MID's Avian Protection Plan is designed to protect wildlife (birds) from contacting energized equipment. MID's avian protection programs include the use of perch deterrents, conductor insulator and jumper cover (bird guard), avian diverters, and installation of nesting platforms. At selected locations, phase spacing between conductors has been increased to provide additional clearances. By making this change, birds or other wildlife will be less likely to create a connection between two conductor phases, which could result in a risk event.

MID experienced one bird-related contact event on the 60kV New Hogan line in August of 2025. Avian protection (See Image 1) equipment was installed at the affected structure, and MID continues to evaluate whether additional avian protection measures are warranted.

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Image 1: Example of Avian Protection, New Hogan Line



5.3.3 Oil Circuit Breaker Replacement

During the 2023-2025 WMP cycle MID replaced five oil circuit breakers (OCB) with air circuit breakers at substations located outside of the HFTD.

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There is one oil circuit breaker at the 60kV New Hogan line terminal. The breaker is tested every year, and complete maintenance is performed every four years. Complete breaker maintenance was completed on October 5, 2023. The source/remote end of this line is owned, operated, and maintained by PG&E.

5.4 Vegetation Management

Most of the vegetation in MID's service area includes crops in frequently irrigated fields, primarily nuts and fruits. To the east of MID's service territory there is dry wild grass and low growth bushes. Specifically, within the New Hogan line area, there are mild amounts of grass, small brush, and some nearby trees, as well as areas of just mixed dirt and gravel.

MID meets or exceeds the industry standards for vegetation management around transmission lines, distribution lines, and substation facilities. For transmission-level facilities, MID complies with NERC FAC-003, where applicable. For both transmission and distribution level facilities, MID meets or exceeds the following standards:

1. CA Public Resource Code (PRC) § 4291
2. CA PRC § 4292
3. CA PRC § 4293
4. CPUC GO 95 Rule 35
5. CPUC GO 95 Appendix E Guidelines to Rule 35
6. CAL FIRE's Power Line Fire Prevention Field Guide - 2021

These standards require significantly increased clearances in the HFTD. The recommended time-of-trim guidelines do not establish a mandatory standard but instead provide useful guidance to utilities. MID will use specific knowledge of tree growth rates and tree species to determine the appropriate time-of-trim clearance in each circumstance.

MID's Trouble department reviews the vegetation management program on a yearly basis and recommends updates or changes to the WMP as needed for effectiveness. Any changes made to the vegetation management program that coincide with the WMP will be reviewed by all departments involved and the changes will be recommended for implementation into the WMP as needed.

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To comply with industry, state, and federal standards, MID maintains the following internal vegetation management procedures:

1. Operating Bulletin No. 37 - Transmission & Distribution Vegetation Management Program, and
2. Operating Bulletin No. 42 - 230kV Transmission Vegetation Management Program (TVMP).

These procedures provide the methodology for preventing encroachment into minimum vegetation clearance distances of energized overhead lines and on clearing vegetation from the energized lines by maintaining safe clearance.

MID's Vegetation Manager is a Qualified Electrical Worker (QEW or Journeyman level line worker) and a member of the International Society Arboriculture (ISA) and Utilities Arborist Association (UAA). MID contracts with a tree trimming service to maintain clearance around its power lines and structures. The tree trimming services are performed by Qualified Line Clearance Tree Trimmers (QLCTT). The contractor adheres to the Minimum Approach Distances (MADs) set by Cal/OSHA. MID's Vegetation Manager makes periodic field visits to check trimming activities and worksite safety.

All contractors and MID personnel are required to maintain safe working distances from energized lines and use spark arrestors on their equipment for worker safety and to reduce the risk of an ignition.

The MID Trouble department maintains patrol reports documenting vegetation inspection and maintenance records.

5.4.1 Vegetation Inspections

5.4.1.1 Vegetation Inspections / Transmission Lines

MID conducts vegetation inspections around transmission lines in compliance with local, state, and federal standards. For operated and maintained transmission line segments located in HFTD, MID conducts vegetation inspections five times per year.

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5.4.1.2 Vegetation Inspections / Distribution Lines

MID conducts vegetation inspections around distribution lines in compliance with local, state, and federal standards. MID has no distribution lines in the HFTD.

5.4.1.3 Vegetation Inspections / Substations

MID conducts biweekly substation inspections of all 43 substations. These routine inspections include inspection of vegetation in and around the facility.

5.4.2 Vegetation Management / Maintenance

5.4.2.1 Vegetation Management around Transmission Assets

MID conducts vegetation management (maintenance) around transmission lines in compliance with local, state, and federal standards, or as needed when identified. For operated and maintained transmission line segments located in HFTD, clearing/trimming is completed within two weeks from the time the follow up is issued.

5.4.2.2 Vegetation Management around Distribution Assets

MID conducts vegetation management (maintenance) around distribution lines in compliance with local, state, and federal standards. MID has no distribution lines in the HFTD.

5.4.2.3 Vegetation Management in and around Substations

The MID Substation Supervisor is accountable for the vegetation management in and around the substations. Any weeds inside the station are sprayed and trees outside of the fence are trimmed as needed.

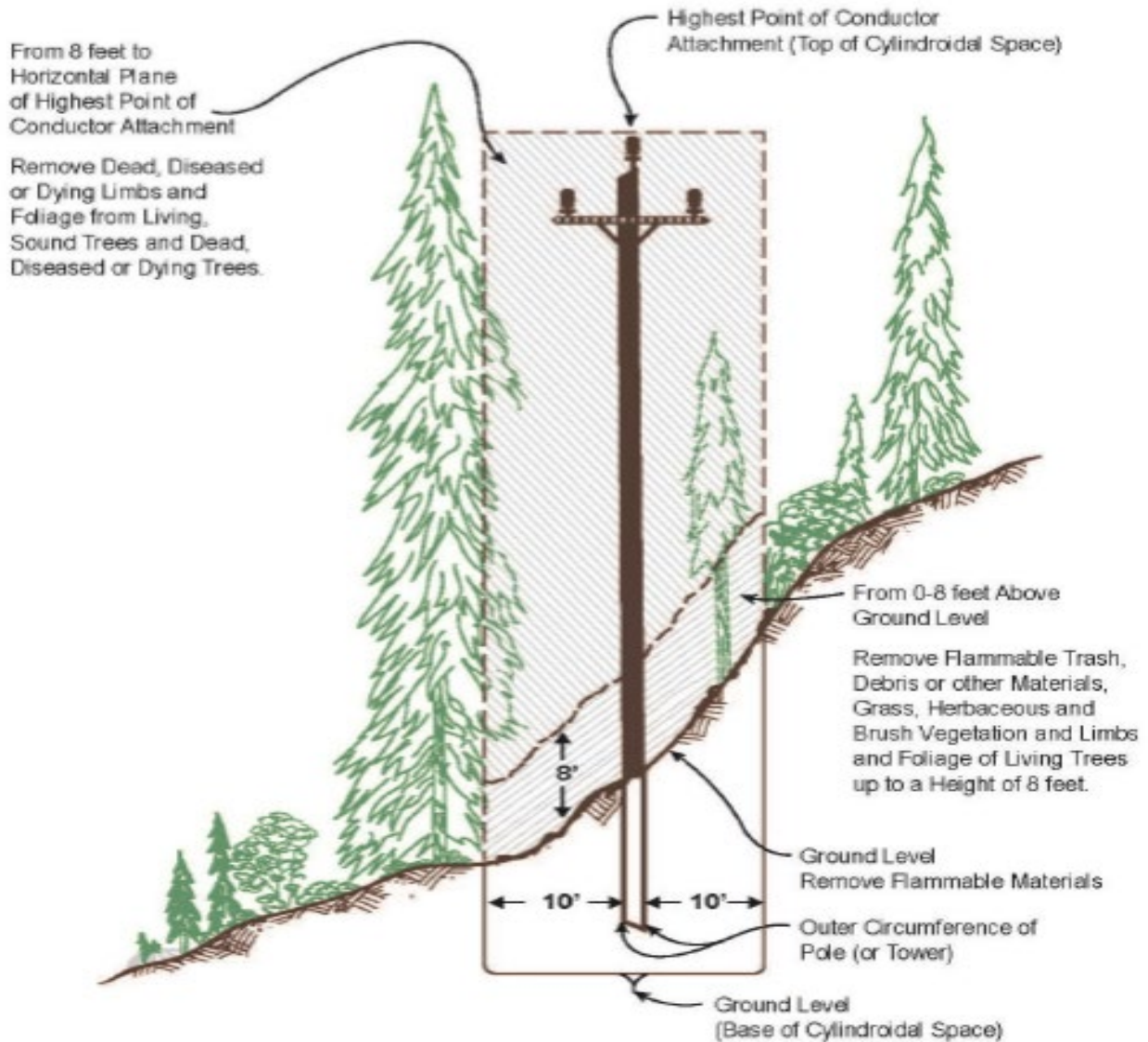
5.4.2.4 Brush Clearing

MID's Vegetation Management Program includes a fuel reduction program and brush clearing around electrical assets in compliance with PRC § 4292. MID identifies and removes (where practical) the sources of fuels around its energized lines that could potentially contribute to the start and growth of wildfires. Examples of such fuels include brush, grass, dry leaves, dry branches, dead wood, etc.

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The CCWD-owned and MID-operated 60kV New Hogan line is comprised of 47 poles with 30 poles located within the HFTD. In 2026, MID has begun annual brush clearing of all 47 poles consistent with PRC § 4292.

Figure 12: PRC § 4292 Firebreak Clearance Requirements



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5.4.2.5 Quality Assurance / Quality Control (QA/QC)

MID does not perform a separate QA/QC process of its work due to the frequency of its inspection and trim cycles which are performed five times per year.

5.5 Asset Inspections

MID meets or exceeds the minimum inspection requirements of CPUC GO 95 Rule 18, CPUC GO 165, and CPUC GO 174. Pursuant to these rules, MID inspects electric facilities as required. MID has operating procedures that detail the inspection frequency and methodologies and establishes the criteria for repair or replacement of the assets.

MID's only operated and maintained asset within the HFTD—the CCWD-owned 60kV New Hogan transmission line—is inspected five times per year. MID staff use their knowledge of the specific environmental and geographical conditions of MID's service territory to determine if any areas require more frequent inspections.

The Trouble department also inspects overhead electric lines per established requirements on a yearly basis. The department maintains the records of such inspections. Any deficiencies found during inspections are prioritized and addressed according to the level of severity.

If MID staff discover a facility in need of repair that is owned by an entity other than MID, MID will issue a notice of repair to the facility owner and work to ensure that necessary repairs are completed promptly.

Any identified imminent risk to public or employee safety as identified during such inspection will be immediately addressed.

5.5.1 Overhead Asset Inspections

5.5.1.1 Transmission Line Patrols

MID conducts transmission line patrols in compliance with local, state, and federal standards. MID conducts five line patrols per year on the CCWD-owned 60kV New Hogan line which is the only MID-operated and maintained facility located within the HFTD.

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5.5.1.2 Transmission Line Detailed Inspections

MID conducts detailed inspections of transmission lines in compliance with local, state, and federal standards. MID conducts annual detailed inspections on the CCWD-owned 60kV New Hogan line.

5.5.1.3 Distribution Line Inspections and Patrols

MID conducts distribution line patrols in compliance with local, state, and federal standards. MID has no distribution lines in the HFTD.

5.5.1.4 Intrusive Pole Inspections

In 2025 MID conducted intrusive pole inspections for all wood poles in the HFTD. Only one guy pole failed the inspection and was replaced on April 3, 2025.

5.6 Workforce Training

Electrical workers are continuously exposed to hazards from energized power lines and equipment. If proper safety and work procedures are not followed, risks may include personnel injury or death, equipment failure leading to power outages, or exposing safety risks to the public.

Safety is a positive and integral part of the culture at MID. MID provides a variety of training for all levels of employees to perform their jobs in the safest and most efficient manner. MID crews always adhere to safe work practices.

All electrical workers are provided with classroom and on-the-job training. Only trained and QEWS are authorized to work on specific jobs. Prior to commencing any work, a job briefing is held with everyone on site. All safety procedures are followed. MID requires all electrical workers to adhere to all safety procedures and wear proper personal protective equipment while working on the lines and equipment.

MID provides employees with the necessary and appropriate tools and equipment required to perform their work. These tools and equipment are also properly maintained. All MID vehicles are regularly serviced to reduce the risk of creating a spark (i.e., faulty brakes or metal in contact with the ground).

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MID provides annual training on the use of fire extinguishers for personnel and for new employees as part of the on-boarding process.

5.7 Recloser Policy

An industry best practice is to disable the automatic reclose function on circuits that traverse the HFTD when critical fire weather conditions are forecasted or are being observed. The CCWD-owned 60kV New Hogan line is the only facility in the HFTD that MID operates and maintains and it does not have an automatic recloser.

5.8 Preemptive De-energization

MID has the authority to preemptively de-energize electrical facilities when necessary to protect public safety.

Preemptive de-energization of utility electrical assets during critical fire weather conditions is more commonly known as a PSPS. A PSPS is used to minimize the risk of utility infrastructure igniting or contributing to a wildfire. Many utilities throughout the Western states now execute PSPS for public safety.

The CCWD-owned and MID-operated 60kV New Hogan line is subject to de-energization during critical fire weather conditions when PG&E determines that the line could be a potential source of ignition. The only MID system impact from de-energizing the line is the loss of the CCWD-owned and MID-operated New Hogan generator which would not result in any system reliability concerns or impacts to MID nor PG&E customers.

MID does not operate load-serving distribution facilities within the HFTD, and there are no MID customers that could be impacted by the PSPS of a neighboring utility, such as PG&E; no PG&E distribution circuits that are subject to PSPS serve any MID facilities or customers.

Based on MID's assessment of its electrical assets, historical fire patterns, vegetation conditions, and topography within the HFTD, MID has established a preemptive de-energization protocol for the CCWD-owned and MID-operated 60kV New Hogan line. This protocol recognizes that PG&E may de-energize the line during critical fire weather conditions

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as part of its PSPS program, and MID may also coordinate with PG&E to proactively de-energize the line when wildfire risk conditions warrant such action.

5.8.1 Impacts to Public Safety

As noted above, MID has an established preemptive de-energization protocol with no load-serving assets located in or through the HFTD and no MID customers impacted by a neighboring utility's PSPS.

5.8.2 Customer Notification Protocols

MID customer communication/information is for unplanned interruptions which include interruptions caused by wildfires. Information provided for an unplanned interruption includes, but is not limited to, time outage occurred, estimated time of restoration, number of customers impacted, and outage cause.

5.8.3 Restoration of Service

For unplanned interruptions MID follows an established set of procedures for the restoration of service. MID's System Restoration Plan details the restoration of service following emergencies and disturbances, consistent with these general guidelines:

1. Trouble department crews patrol the lines.
2. Any abnormalities to the infrastructure are identified during the patrol and resolved.
3. A qualified line worker confirms lines are safe to energize.
4. Restore service.

For a PSPS on the 60kV New Hogan line, the restoration procedure is as follows:

1. PG&E declares an all clear and the line is ready for service.
2. PG&E notifies MID to patrol the line from the MID New Hogan line terminal to the point of demarcation between PG&E and MID.
3. MID completes the line patrol and notifies PG&E.
4. PG&E will energize the line from the PG&E line terminal.
5. MID will reconnect the New Hogan generator and resume operations.

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Restoration of service after a wildfire varies depending on several factors. First, the AHJ of the incident must give approval for MID personnel to access the burn area. Qualified personnel must then conduct a damage assessment of the area to determine the extent of damage to MID assets. The outage duration will depend upon the extent of damage done to the electrical infrastructure and time required to repair the equipment.

Restoration of service involves the coordination between various departments within the T&D Division. Where possible, restoration is prioritized to critical facilities. Best attempts are made to restore service as soon as possible.

6. STAKEHOLDER OUTREACH AND ENGAGEMENT

MID's Public Affairs department, reporting directly to the GM, is responsible for MID's public information management including public relations, media relations, advertising, social media, reputation management, and crisis communications. The MID website, direct mail, e-mail, local media outlets, social media, and paid advertising are all tools MID uses to educate and inform its customers. The WMP is another available tool, publicly accessible on MID's website.

In addition to viewing the MID website, community members who are interested in learning more about what is happening at MID are encouraged to attend the regularly scheduled Board meetings. The MID BOD typically meets on the second and fourth Tuesday of each month. MID's Board encourages public participation on the topics of discussion. Live streaming is also available for those who cannot attend meetings. Meeting agendas and videos are archived on the MID website.¹¹

MID's Energy Service department is in regular communication with major customers. Communications include load forecasting, coordinating scheduled outages, addressing

¹¹ <https://www.mid.org/about-us/governance/board-meetings/>

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situational awareness, and other important topics that can have direct or indirect impact on MID's and/or the customer's operations.

MID plays an active role in the community and maintains a sound relationship with neighboring utilities, local government organizations, and local law enforcement and fire agencies. MID representatives regularly interact with these agencies on pressing issues.

MID provides copies of its WMP to CAL FIRE, Modesto Fire Department, Stanislaus County OES, Stanislaus Consolidated Fire Department, Calaveras County Fire, and Calaveras County OES.

6.1 MID Emergency Response Plan

MID's Emergency Response Plan outlines MID departmental responsibilities for response, communications, and recovery from major incidents.

6.2 Coordination with Critical Infrastructure Providers

The U.S. Cybersecurity & Infrastructure Security Agency states that "There are 16 critical infrastructure sectors whose assets, systems, and networks, whether physical or virtual, are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health or safety, or any combination thereof."¹²

MID serves no critical infrastructure facilities in the HFTD. For other MID system emergencies, we adhere to the communication protocols outlined in our Emergency Operations Plan. We consider the following infrastructure sectors within our service territory of critical importance to the safety and health of the MID customers. MID's Emergency Operations Plan describes the coordination activities between MID and the following sectors:

- Water and Wastewater Systems,

¹² <https://www.cisa.gov/critical-infrastructure-sectors>

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- Communications, and
- Healthcare and Public Health.

6.3 California Municipal Utilities Association (CMUA) Collaboration

CMUA hosts a bi-weekly call with CMUA members, specific to the development of the WMPs. MID actively participates in these calls, along with other POUs.

6.4 Mutual Assistance Agreements

MID is a member of the California Utilities Emergency Association (CUEA),¹³ which plays a key role in ensuring communications between utilities during emergencies. MID also participates in the Western Energy Institute's Western Region Mutual Assistance Agreement,¹⁴ which is a mutual assistance agreement covering utilities across several western states.

7. EVALUATING WMP PERFORMANCE

7.1 Metrics and Assumptions for Measuring WMP Performance

MID tracks three metrics to measure the performance of this WMP. MID adopted the applicable outcome and performance metric categories recommended and developed by CMUA in coordination with the WSAB. The current metrics data goes back to 2022 which includes the prior WMP reporting cycle (see Tables 6-8 below). The three metrics are tracked by MID's Electric Engineering department and include:

7.1.1 Metric 1: Fire Ignitions

For purposes of this metric, a fire ignition is defined as follows:

1. MID facility was associated with the ignition of the fire.

¹³ <https://cuea.net/>

¹⁴ <https://www.westernenergy.org/wrmaa-resources/>

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2. The fire was self-propagating and of a material other than electrical and/or communication facilities.
3. The resulting fire traveled greater than one meter (approx. 3.28 feet) from the ignition point.

MID will continue to record the number of fires that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

Table 6: Performance Metrics - Ignitions

	2022	2023	2024	2025
Ignitions in HFTD	0	0	0	0
Ignitions outside HFTD	1	1	0	0

7.1.2 Metric 2: Wires Down

The second metric is the number of distribution and transmission wires downed within MID's service territory, tracked separately inside and outside HFTD, including car-pole incidents. For purposes of this metric, a wire-down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or onto a foreign object.

Table 7: Performance Metrics – Wire Down

	2022	2023	2024	2025
Wire down in HFTD	0	0	0	0
Wire down outside HFTD	36	36	38	21

7.1.3 Metric 3: Vegetation Management and Inspections

To measure the effectiveness of the vegetation management program each year, MID will keep records of the following incidents in the HFTD:

1. Percentage of vegetation inspections completed in the HFTD. Target is 100%.

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2. Vegetation clearing completed in the HFTD. Target is 100%.
3. Pole clearing (brushing) program completed in the HFTD. Target is 100%.

Table 8: Performance Metrics – Vegetation Management in HFTD

Performance Metrics / Veg Management in HFTD 2022-2025				
	2022	2023	2024	2025
No. Inspections/Line Patrols	4 (100%)	5 (100%)	5 (100%)	5 (100%)
Vegetation Clearing complete	100%	100%	100%	100%
Pole Clearing complete	100% 2 poles	100% 2 poles	100% 2 poles	100% 47 poles

7.2 Impact of Metrics

Because MID has limited infrastructure within the HFTD, available wildfire-related performance data is limited. MID will continue collecting and analyzing performance data to identify trends and evaluate mitigation effectiveness. As additional data becomes available, MID will refine its mitigation strategies as appropriate.

7.3 Monitoring and Auditing the WMP

The successful implementation of this WMP requires a collective effort from various MID departments. Each department lead, listed in Section 3, Roles and Responsibilities, is responsible for ensuring the execution of the applicable tasks stated within the WMP. The department lead ensures that the applicable tasks have been completed in a safe and timely manner. A proactive approach will be taken in identifying emergent hazards and taking corrective action.

Any deficiencies noted during the execution of this WMP will be recorded and improvements recommended for implementation by the department lead on a yearly basis.

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MID collaborates with other POU's to create guidelines for future WMPs through attendance in bi-weekly meetings with the CMUA. Additionally, MID follows recommendations put forth in the WSAB's Guidance Advisory Opinion to help with revisions to the WMP.

7.4 Corrective Action Program

MID is committed to making this WMP as effective and robust as possible. MID is also aware that identifying gaps and deficiencies in the WMP is a continuous process which is learned through experience and specific record keeping. Once identified, any gaps or deficiencies will be corrected.

MID understands that changes to the WMP could occur due to new policies, changes in strategies, or changes in technology.

MID will evaluate such gaps and update the WMP as appropriate.

7.5 Monitoring the Effectiveness of the WMP

During the 2023-2025 WMP cycle, MID did not identify any deficient programs applicable to CCWD-owned but MID-operated and maintained assets within the HFTD. However, MID did experience a 60kV New Hogan line interruption due to a bird contact. Following an investigation MID installed avian protection as described in Section 5.3.2. MID will continue monitoring and documenting the listed performance metrics to ensure expected performance of the WMP.

8. INDEPENDENT EVALUATION

PUC § 8387(c) requires MID to contract with a qualified IE with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this WMP. MID's WMP will continue to be updated, per the WSAB schedule, and MID will commission an IE review and report every four years.

MID may hire IEs for WMP evaluation on an as-needed basis within the four-year period.

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Selection of the successful IE will be made based on the IE's level of experience with wildfire mitigation plans, familiarity with similar type and size utilities, knowledge of utility's design and construction standards, and recommendations from references.

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APPENDIX FOR REFERENCE DOCUMENTS

1. [GO 95](#) - Overhead electric line construction. Revised 01/16/2020 (Decision No. 20-01-010)
2. [GO 128](#) - Construction of underground electric supply and communication systems
3. [GO 165](#) - Inspection cycles for electric distribution facilities. Revised 12/14/2017
4. [GO 174](#) - Rules for Electric Utility Substations
5. [NERC FAC-003-4](#) – Transmission Vegetation Management
6. [California Power Line Fire Prevention Field Guide](#), 2021 Edition
7. [Standardized Emergency Management System](#) (SEMS)
8. [Wildfire Safety Advisory Board](#) (WSAB) - The WSAB reviews the WMPs submitted by Publicly Owned Electric Utilities and Electrical Cooperatives (together, POUs) and provides comments and Advisory Opinions.
9. [CPUC High Fire Threat District Map](#)