

RESOLUTION NO. 2026 - 34

**RESOLUTION ADOPTING THE TURLOCK IRRIGATION DISTRICT
2026 WILDFIRE MITIGATION PLAN UPDATE**

WHEREAS, California Public Utilities Code section 8387 requires the Turlock Irrigation District to prepare and maintain a Wildfire Mitigation Plan (WMP) addressing measures to reduce the risk of utility-caused wildfire; and

WHEREAS, staff has updated the WMP to reflect work completed in 2025 and 2026, including deployment of additional weather stations, installation of four additional East Side reclosers in 2026, accelerated intrusive wood-pole inspections and replacement of deficient wood poles with fiberglass poles, and updated goals for 2026 and future years; and

WHEREAS, the 2026 WMP includes the AiDash vegetation management pilot, enhanced fire-season recloser settings and automation planning, additional grid-hardening and weather-monitoring efforts, and updated Public Safety Power Shutoff protocols.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Turlock Irrigation District that the Turlock Irrigation District 2026 Wildfire Mitigation Plan Update is hereby adopted.

Moved by Director Alamo, seconded by Director Frantz, that the foregoing resolution be adopted.

Upon roll call the following vote was had:

Ayes:	Directors Arellano, Frantz, Alamo, Macedo, & Yonan
Noes:	None
Absent:	None

The President declared the resolution adopted.

I, Jennifer Land, Executive Secretary to the Board of Directors of the TURLOCK IRRIGATION DISTRICT, do hereby CERTIFY that the foregoing is a full, true and correct copy of a resolution duly adopted at a regular meeting of said Board of Directors held the 22nd day of September, 2026.



Executive Secretary to the Board of
Directors of the Turlock Irrigation District



WATER & POWER
Serving Central Tarrant County

WILDFIRE MITIGATION PLAN

2026



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Table 1: Turlock Irrigation District 2026 Wildfire Mitigation Plan Revision Log

Date	Location	Description
June 2026	Sec. 6.3 page 37	Updated tasks completed for 2025.
	Sec. 6.3 page 38	Updated goals for 2026 and beyond.
	Sec. 6.3 page 36	Updated 2024 Fire Zone work and 2025 Future Years Action Plan
	Section 6.5 page 43	Updated plan to show TID is now in the final year of a 10-year cycle to perform intrusive testing on all of its wood poles.
	Sec 6.8 page 46-48	Updated TID's public safety power shutoff protocols
	Appendix 1	Updated wildfire mitigation plan initiatives appendix.

1.0 OVERVIEW

1.1 POLICY STATEMENT

Senate Bill 901, approved in 2018, amended Public Utilities Code §8387 which requires TID to prepare a wildfire mitigation plan that describes how electrical lines and equipment are constructed, maintained, and operated in a manner that minimizes the risk of wildfire. TID has had standard requirements for design, construction and maintenance in the Fire Zones to reduce wildfire risk. This Wildfire Mitigation Plan (WMP) builds on those requirements and complies with PUC §8387.

1.2 PURPOSE

This Wildfire Mitigation Plan describes programs, policies, and procedures implemented by TID to mitigate the threat of power line-ignited wildfires. This plan is subject to direct supervision by the TID Board of Directors and is implemented by the TID Management Team. Specific roles and responsibilities for the plan are identified in Section 9.1. Every submission of TID's Wildfire Mitigation Plan includes an opportunity for public comment prior to the resolution being adopted. In 2023 TID performed a comprehensive update to the Wildfire Mitigation Plan and requested public comment prior to TID Board of Directors adoption of the plan through posting the draft plan on TID's website.

1.2.1 Wildfire Budgeting

TID wildfire budgeting is focused on spending in wildfire zones with vegetation management and capital improvements.

1.3 COMPLIANCE WITH PUC §8387 (b)

Table 2 lists each of the elements required of Public Utilities Code §8387 (SB 901) and references where that information can be found in this plan.

Table 2: Plan Compliance with Public Utilities Code §8387 (b)

b (2) (A)	An accounting of the responsibilities of persons responsible for executing the plan.	9.1
b (2) (B)	The objectives of the wildfire mitigation plan.	2.0
b (2) (C)	A description of the preventive 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.	6.0
b (2) (D)	A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.	9.2
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.	6.3
b (2) (F)	Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	6.7
b (2) (G)	Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities and operators of telecommunications infrastructure.	7.4
b (2) (H)	Plans for vegetation management.	6.4
b (2) (I)	Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	6.5
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:	4.0

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.	6.3
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.	4.3, 4.5
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.	5.2
b (2) (L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.	4.1
b (2) (M)	A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	8.0
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:	See below;
b (2) (N) (i)	Monitor and audit the implementation of the wildfire mitigation plan.	9.2
b (2) (N) (ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.	9.4
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.	9.5

b (3)	The local publicly owned electric utility or electrical cooperative shall present each 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.	7.3, 1.3
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 web site 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.	10.0

Table 3: Context Setting Information

Utility Name	Turlock Irrigation District	
Service Territory Size	662 square miles	
Owned Assets	(Yes) Transmission (Yes) Distribution (Yes) Generation	
Number of Customers Served	100,000 customer accounts	
Population Within Service Territory	239,815	
Customer Class Makeup	Number of Accounts	Share of Total Load (MWh)
	71.53% Residential; 1.16% Government; 2.83% Agricultural; 7.10% Small/Medium Business; .84% Commercial/Industrial	37.95% Residential; 6.08% Government; 10.48% Agricultural; 6.22% Small/Medium Business; 37.36% Commercial/Industrial 1.91% Other
Service Territory Location/Topography ¹	56.04% Agriculture .009% Barren/Other 0% Conifer Forest .001% Conifer Woodland 0% Desert .005% Hardwood Forest	

¹ This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) *available at:* <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

	9.63 % Hardwood Woodland 21.22% Herbaceous 5.46% Shrub 5.55% Urban 1.94% Water																																																								
Service Territory Wildland Urban Interface² (based on total area)	1.3612% Wildland Urban Interface; .3561% Wildland Urban Intermix;																																																								
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Includes Appendix Tier 2: 29% Tier 3: 0%																																																								
Prevailing Wind Directions & Speeds by Season	☐ Includes maps Prevailing Wind Direction 1992-2002 Prevailing wind direction is based on the hourly data from 1992-2002 and is defined as the direction with the highest percent of frequency. <table><tr><td>Station</td><td>JAN</td><td>FEB</td><td>MAR</td><td>APR</td><td>MAY</td><td>JUN</td><td>JUL</td><td>AUG</td><td>SEP</td><td>OCT</td><td>NOV</td><td>DEC</td><td>ANN</td></tr><tr><td>Modesto Airport</td><td>SE</td><td>SE</td><td>NW</td><td>NW</td><td>NW</td><td>NW</td><td>NNW</td><td>NNW</td><td>NW</td><td>NW</td><td>NW</td><td>SE</td><td>NW</td></tr></table> Average Wind Speed 1996-2006 Average wind speeds are based on the hourly data from 1996-2006 from automated stations at reporting airports (ASOS) unless otherwise noted. <table><tr><td>Station</td><td>JAN</td><td>FEB</td><td>MAR</td><td>APR</td><td>MAY</td><td>JUN</td><td>JUL</td><td>AUG</td><td>SEP</td><td>OCT</td><td>NOV</td><td>DEC</td><td>ANN</td></tr><tr><td>Modesto Airport</td><td>5.0</td><td>6.2</td><td>7.0</td><td>7.8</td><td>8.9</td><td>9.4</td><td>8.6</td><td>8.1</td><td>6.9</td><td>6.0</td><td>5.0</td><td>5.6</td><td>7.0</td></tr></table> Source – Western Regional Climate Center https://wrcc.dri.edu/Climate/wind.php	Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN	Modesto Airport	SE	SE	NW	NW	NW	NW	NNW	NNW	NW	NW	NW	SE	NW	Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN	Modesto Airport	5.0	6.2	7.0	7.8	8.9	9.4	8.6	8.1	6.9	6.0	5.0	5.6	7.0
Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN																																												
Modesto Airport	SE	SE	NW	NW	NW	NW	NNW	NNW	NW	NW	NW	SE	NW																																												
Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN																																												
Modesto Airport	5.0	6.2	7.0	7.8	8.9	9.4	8.6	8.1	6.9	6.0	5.0	5.6	7.0																																												
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 1772 miles - SRA and Tier 2 – 4.6% (east 41 miles + west 42 miles) - Only SRA - 3.1% (East 39.50 miles + West 16.50 miles) - Tier 2 Only - 1.5% (East 1.50 miles + West 25.50 miles)																																																								

² This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at chrome-extension://efaidnbmnnnibpcjpcglclefindmkaj/https://www.fs.usda.gov/nrs/pubs/rmap/rmap_nrs8.pdf.

	Overhead Trans.: 441 miles (<i>Of this, 96 miles is jointly owned.</i>) • SRA and Tier 2 – 17% (East 68.58 miles + West 8 miles) • Only SRA - 14% • Tier 2 - 3% Underground Dist.: 535 miles Underground Trans.: 0 miles
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System</i> <i>(Inside and Outside Service Territory)</i>
	Tier 1 and 2 Only: 4.2% Tier 3: 0%
	<i>Overhead Transmission Lines as % of Total Transmission System</i> <i>(Inside and Outside Service Territory)</i>
	Tier 1 and 2: 10% Tier 3: 0%
Customers have ever lost service due to an IOU PSPS event?	☒ Yes ☐ No Number of shutoff events: [1] Customer accounts that lost service for > 10 minutes: [31] For prior response, average duration before service restored [33.5]
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☒ Yes ☐ No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☒ Yes ☐ No
Has previously pre-emptively shut off	☐ Yes ☒ No

electricity in response to elevated wildfire risk?	If yes, then provide the following data for calendar year 2020:
Substations	Power transformers, voltage regulators, protective devices, relays, open-air structures, switchgear and control houses. 6 substations in East Side Fire Zone
Mini Hydro Plants	Generators, transformers, switches, protective devices, control houses

2.1 MINIMIZE ELECTRICAL SOURCES OF IGNITION

The primary objective of this Wildfire Mitigation Plan is to minimize the probability that TID's electrical facilities may be the origin, or a contributing source, for the ignition of a catastrophic wildfire. TID has created Fire Zones within their service territory that are inclusive of the California Public Utilities Commission (CPUC) Tier 2 High Fire Threat District (HFTD) and Cal Fire State Responsibility Areas (SRA). There are no Tier 3 HFTD areas within the TID service Territory. For the purpose of this WMP, TID will apply all wildfire mitigation regulations and standards to electric facilities within its designated Fire Zones. TID's Fire Zone Standard has been updated to comply with CPUC General Orders 95, 128, 165, 174 and Cal Fire's Power Prevention Field Guide. TID continually evaluates prudent and cost-effective improvements to its standards, physical assets, operations, and training that can help meet the objective.

2.2 MAINTAIN RESILIENCY OF THE ELECTRIC GRID

The second goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. Resiliency is the ability for the electric power system to withstand and recover from extreme, damaging conditions, including weather and other natural disasters, as well as cyber and physical attacks. In updating this plan, TID assessed new industry practices and technologies that may reduce the likelihood of an interruption in service and/or improve the restoration of service, and regularly evaluates best practices for possible inclusion in the Plan.

2.3 EVALUATE PLAN PERFORMANCE AND EFFECTIVENESS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of wildfire mitigation measures and look for opportunities to improve efficiency. Where a particular action, program component, or protocol is determined to be unnecessary or ineffective, TID will assess whether a modification or replacement is merited. This plan will also help determine if more cost-effective measures would produce the same or improved results.

3.0 TID PROFILE AND SERVICE AREA

3.1 SERVICE TERRITORY

Turlock Irrigation District is a community-owned, not-for-profit irrigation water and electric utility formed in 1887. It was the first irrigation district in California. Organized under the Wright Act, TID operates under the provisions of the California Water Code. TID is governed by a five-member Board of Directors.

TID's electric service territory spans 432,887 acres, from the crest of the Coast Range across the Central Valley to the foothills of the Sierra adjacent to Don Pedro Reservoir (Figure 1). TID provides retail electric service in Stanislaus and Tuolumne Counties, across the cities of Turlock, Ceres, south Modesto, Keyes, Delhi, Hilmar, Patterson, Diablo Grande, Denair, Hickman, Ballico, and La Grange. TID serves approximately 100,000 electric customers. TID's annual peak load average is 710 MW over the last three years, with an all-time peak of 735 MW in September 2022.

TID operates 379 miles of 230 kV, 115 kV, and 69 kV transmission lines, and distributes electricity at 12 kV through above and below-ground lines. TID derives its generation from TID-owned hydroelectric plants, thermal plants, and a wind power plant. It also purchases additional power from various regional resources, including solar, hydro, and thermal power.

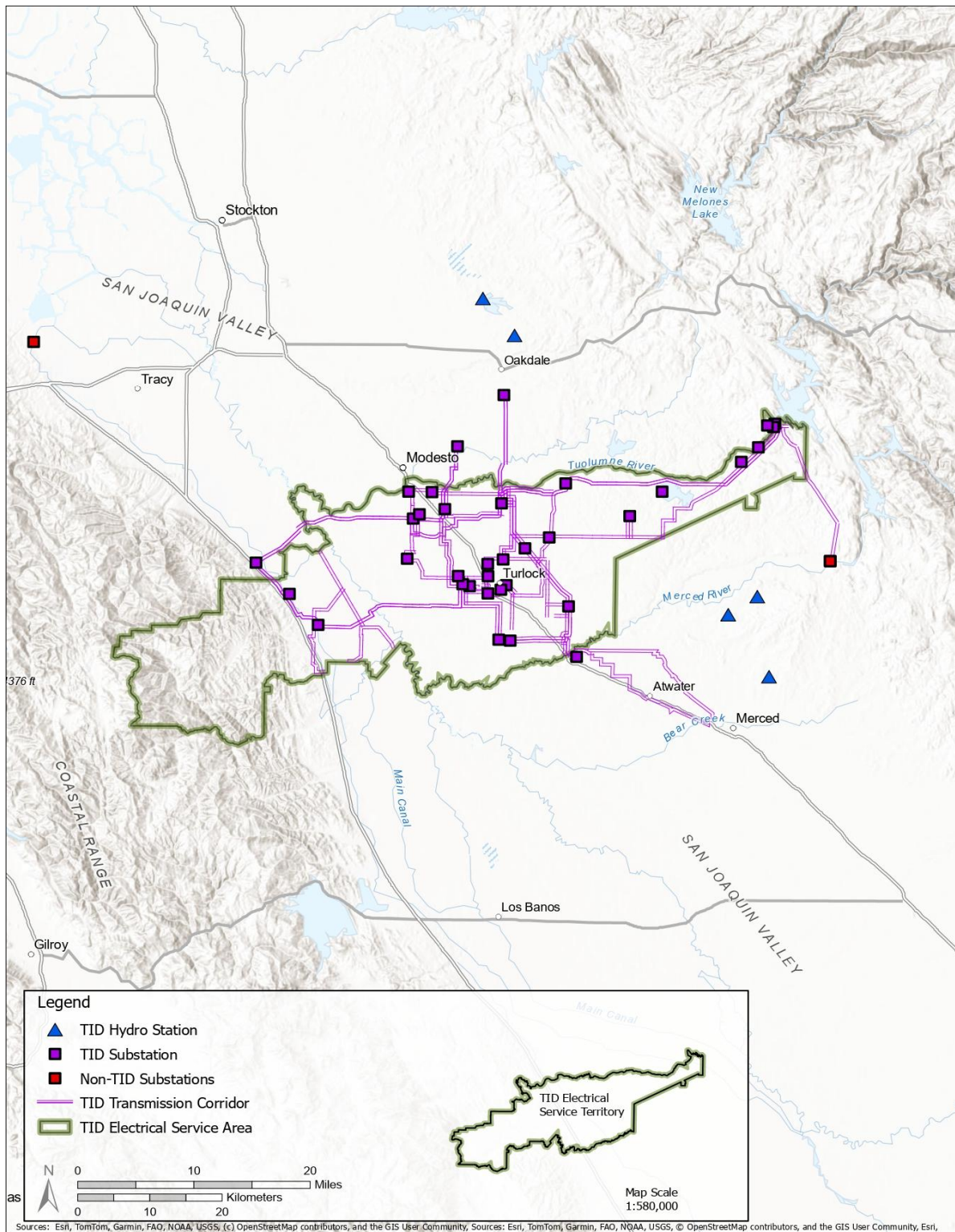


Figure 1: TID Service Territory

3.2 TID PURPOSE AND VISION

Turlock Irrigation District's overarching goal is to provide safe, reliable, and competitively priced irrigation water and electric service to our customers, while being good stewards of our resources and providing a high level of customer satisfaction.

3.3 UTILITY GOVERNANCE STRUCTURE

TID is governed by a five-member locally elected Board of Directors. The Board operates under the provisions of the State of California Water Code as a special district. The Board directs and monitors performance through the General Manager, who in turn directs the actions of the Chief Operating Officer and the Assistant General Managers to achieve TID goals. The Board of Directors is responsible for review and approval of the Wildfire Mitigation Plan.

3.4 WILDFIRE PREVENTION GENERAL PRACTICE

In all of its activities related to electric facility design, maintenance, inspection, and vegetation management, all TID staff adhere to the following principles, goals, and objectives:

- Operate the system in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by TID electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement TID's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing TID practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when the staff witnesses, or is notified that fire protection measures have not been properly installed or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission.
- Collect and maintain wildfire data necessary for the implementation of this Wildfire Mitigation Plan.

- Provide regular training programs for all employees having obligations for implementation of this Wildfire Mitigation Plan.

TID's goal is to prevent electric facilities from starting fires throughout its service territory and wherever its lines are located. Attention is focused toward areas where Cal Fire or the CPUC have identified areas of heightened wildfire risk (e.g., Tier 2 and Tier 3). In these areas, TID complies with Cal Fire's requirements for State Responsibility Areas (SRAs) and CPUC General Order 95 and 165 requirements to reduce risks from electric utilities (Figure 2: Fire Zones in TID Service Territory, Figure 3: East Side Fire Zone including La Grange, Figure 4: West Side Fire Zone including Diablo Grande).

Figure 3 shows that the East Side Fire Zone is in the foothills of the Sierra Nevada and includes riparian vegetation on the south bank of the Tuolumne River. The city of La Grange is located within this area and is crossed by Highway 132. Between the California Department of Forestry and Fire Protection's State Responsibility Area (SRA) and TID's Tier 2 fire zone the East Side Fire Zone contains 41 distribution miles of SRA and Tier 2 elevated fire risk. Of these 41 miles only 1.50 miles are in TID's Tier 2 fire zone while the remaining 39.50 miles are in the SRA. There are 259 customers in SRA and Tier 2 fire zone (SRA 254 customers and Tier 2 fire zone has 5 customer meters). There are 94 customers (meters) within the community of La Grange. The East Side Fire Zone contains 68.58 transmission miles between the SRA and TID's Tier 2 fire zone. The State Responsibility Area is 53.95 miles and TID only has 14.63 miles of transmission line.

Figure 4 shows the West Side Fire Zone and all TID electric facilities in the West Side Fire Zone. This area runs from the edge of the Central Valley to the crest of the Coast Range. The community of Diablo Grande is located within this area and is crossed by Del Puerto Canyon Road. The West Side Fire Zone consists of 8 transmission miles of between the SRA and TID's Tier 2 fire zone. The SRA captures all 8 miles. The West Side Fire Zone furthermore consists of 42 distribution miles between the SRA and TID's Tier 2 fire zone. The SRA is 16.50 miles and TID's Tier 2 fire zone is 25.50 miles. TID has a total of 46 customers in the SRA and 670 customer meters in the Tier 2 fire zone, consisting of the community of Diablo Grande. There is a total of 716 customers between SRA and the Tier 2 fire zone.

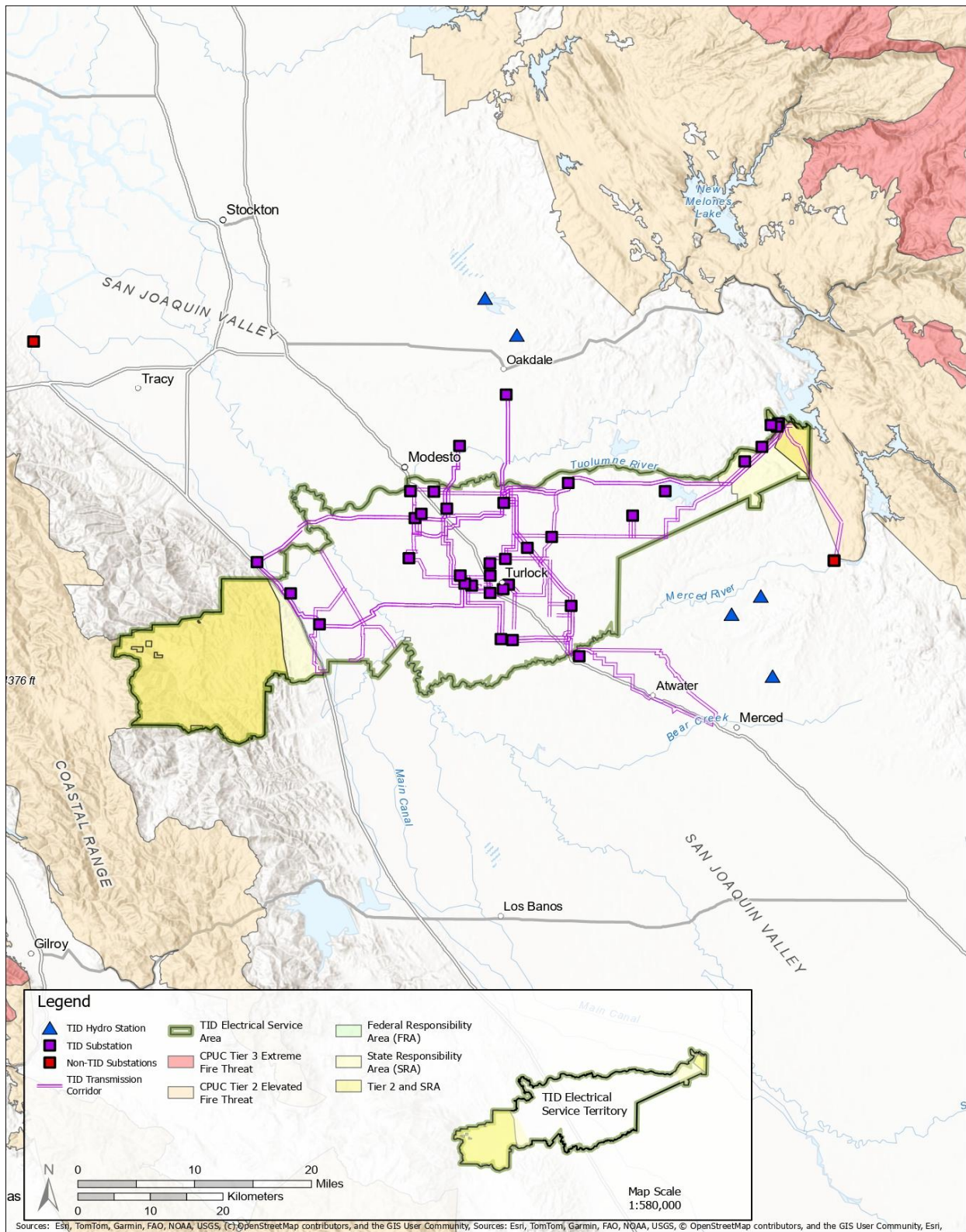


Figure 2: Fire Zones in TID Service Territory

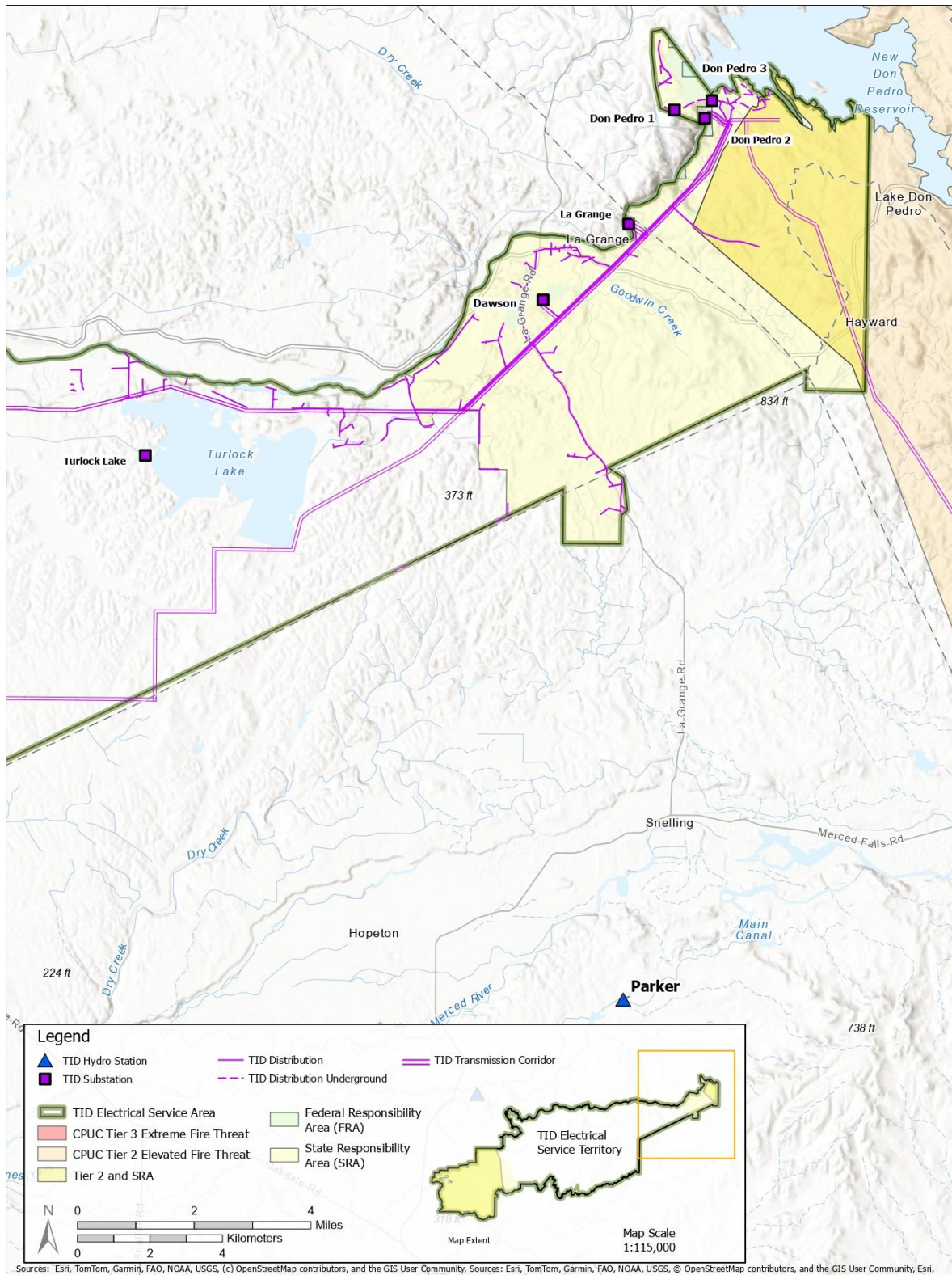


Figure 3: East Side Fire Zone including La Grange

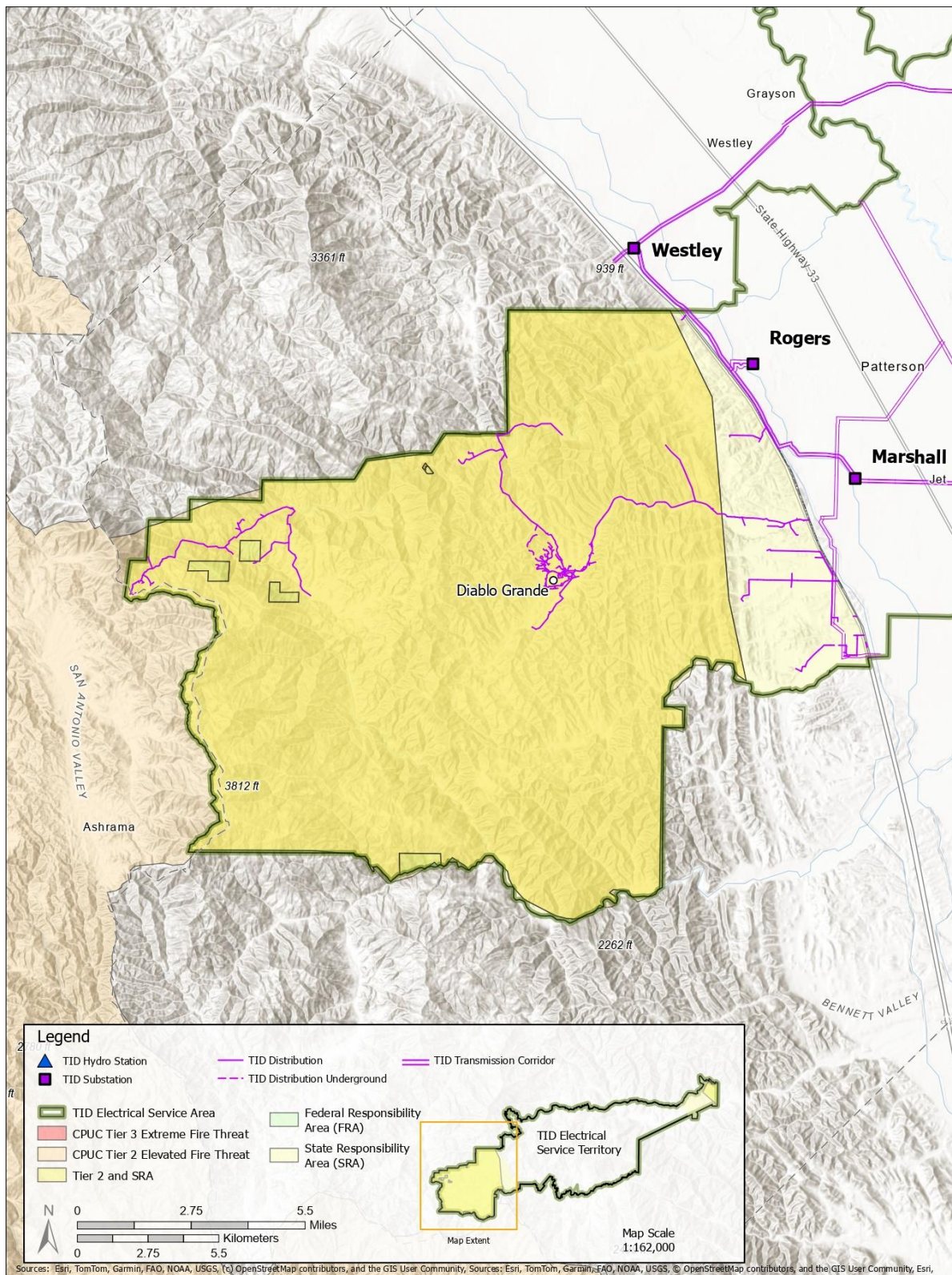


Figure 4: West Side Fire Zone including Diablo Grande

4.0 WILDFIRE RISKS AND DRIVERS

4.1 ENTERPRISE RISK MANAGEMENT

One of TID's Strategic Plan Goals was to develop an Enterprise Risk Management Plan. This plan was completed in early 2021. The operating strategy for Water and Electric Supply and Distribution is to maintain and enhance TID's water and electric resources and customer distribution systems in a sustainable manner. The objective of enterprise risk management is to develop and manage a holistic, portfolio view of the most significant risks to TID's mission of providing reliable and competitively priced water and electric service. TID's Enterprise Risk Management Plan defines risk "as any potential event which could prevent the achievement of an objective, or hinder the performance of key objectives, measured in terms of consequence and likelihood." TID's strategy is to identify, analyze and respond appropriately to enterprise risks. The level of TID's response is determined by the risk appetite and tolerance for identified risks and opportunities. TID's risk appetite is based on the level of risk that TID is willing to take to achieve prospective opportunities that further our goals and strategic imperatives. Risk tolerance is the threshold of risk that TID considers acceptable, balanced with our capabilities to mitigate the identified risks. Risk appetite and tolerance will vary over time according to specific business objectives. Wildfire risk is discussed in other sections of this document.

4.2 FIRE RISK DRIVERS

The primary risk drivers for fire ignitions are

- vegetation contact with wires,
- wire to wire contacts,
- wire down events, and
- electrical equipment failure.

The following contribute to the potential for rapid spread of fire after ignition:



Drought – As the vegetation gets drier, there is a greater risk of fire ignition and rapid spread of fire.



Vegetation Type – The lower elevation of TID's Fire Zone are predominantly grass lands, but as the elevation increases, the vegetation transitions to brush and trees, especially in the Coast Range. If ignited, brush and trees can produce more intense fires.



Vegetation Density – As the elevation increases in TID's Fire Zone, the vegetation density increases, especially in the Coast Range. Greater vegetation density has the potential to produce more intense fires.



Weather – Lack of rain, low humidity, and high temperatures can increase the intensity of fire behavior.



High winds – High winds may increase chances of fire ignition and fire spread.



Terrain – Fire may spread more rapidly uphill, the Coast Range includes terrain that is conducive to the uphill spread of fire. In addition to the Coast Range, there are portions of the Sierra foothills where terrain is conducive to wildfire spread.



Changing Weather Patterns (Climate Change) – As the climate gets drier and/or hotter, conditions in the future may increase fire risk.

4.3 CLIMATE AND CLIMATE CHANGE

The average rainfall in the TID service territory is about 12 inches per year, most of which falls from October through April. Summers are consistently hot and dry. Thus, even in an average or wet year, there is always a heightened risk of fires in the summer and into the fall before the rainy season begins. During dry years, the fire risk can extend into the winter and through the spring. While wet winters can delay the ignition of significant fires later into spring or early summer, they also promote more vegetation growth, and may therefore produce higher fire risk during the inevitable hot, dry, summer season.

The statewide fire experience over the last few years has shown that catastrophic fires

can occur anywhere, even in residential subdivisions outside areas of high fire risk. TID is prepared to assist fire agencies with their response to active fires anywhere within its territory. However, TID concurs with the Cal Fire and CPUC risk designations, and sees no reason to change the boundaries that designate the areas that are the highest risk within the TID territory.

According to experts, climate change is expected to increase the frequency and intensity of wildfires, as well as the extent of wildfires. The severity of wildfires is a function of the type of vegetation, the health of trees, dryness of the combustible vegetation material involved, slope, topography, and weather conditions. Tree stress and mortality, including damage due to insect infestations such as the bark beetle exacerbate fire hazards, causing catastrophic fires.

Fire season has historically extended from early spring through the late fall, but due to drier conditions and increasing urban development in fire-prone areas, fire protection and mitigation is becoming a year-round necessity.

4.4 VEGETATION TYPE

Vegetation types vary across the TID service territory. The Central Valley is dominated by agricultural (i.e. row crops, orchards, vineyards, pasture), and urban development. These vegetation types are considered to be lower fire risk because irrigation and frequent fire breaks minimize the chance for a fire to propagate. By contrast, the Fire Zones identified in the eastern and western portions of the territory have zones dominated by chaparral, shrub and woodland environments. Once fire starts in these vegetation types, the additional fuel load and lack of fire breaks can fuel a very intense fire that moves quickly and is hard to control (Figure 5: East Side Fire Zone Vegetation Map, Figure 6: West Side Fire Zone Vegetation Map).

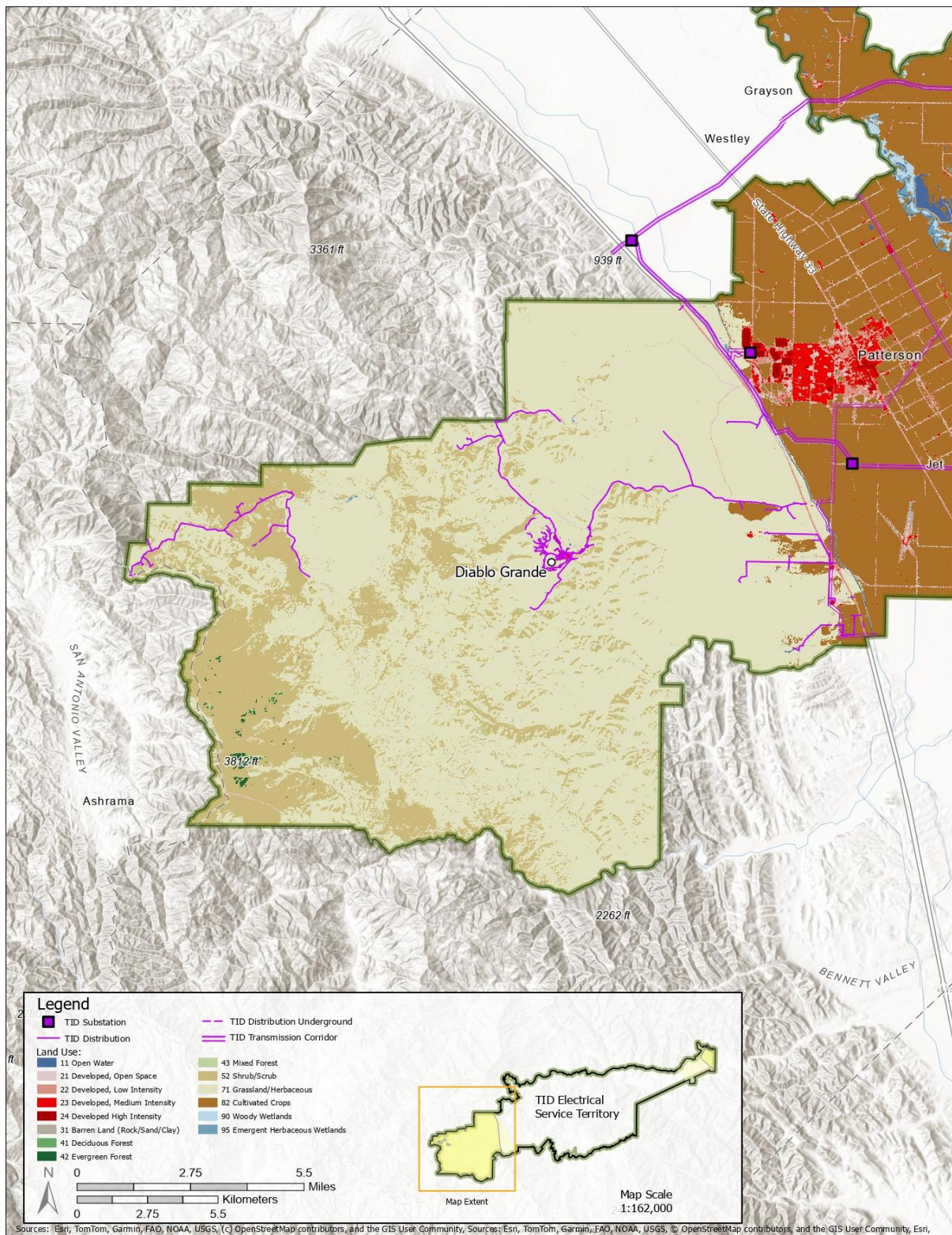


Figure 6: West Side Fire Zone Vegetation Map

4.5 TOPOGRAPHY AND SLOPE

Fires propagate and move faster depending on topography. Flat or moderate slopes (0-5%) generally have slower moving fires, with lower intensity than fires on steeper slopes (10-30%). In the TID service territory, slopes are flat to moderate throughout the Central Valley and become steeper in the East and West Fire Zones. The East zone, near Don Pedro reservoir tends to be more moderate (slopes < 10%), but the West Fire Zone has slopes exceeding 20%. Higher slopes along with chaparral vegetation constitute an area of higher fire hazard (Figure 7: East Side Slopes, Figure 8: West Side Slopes).

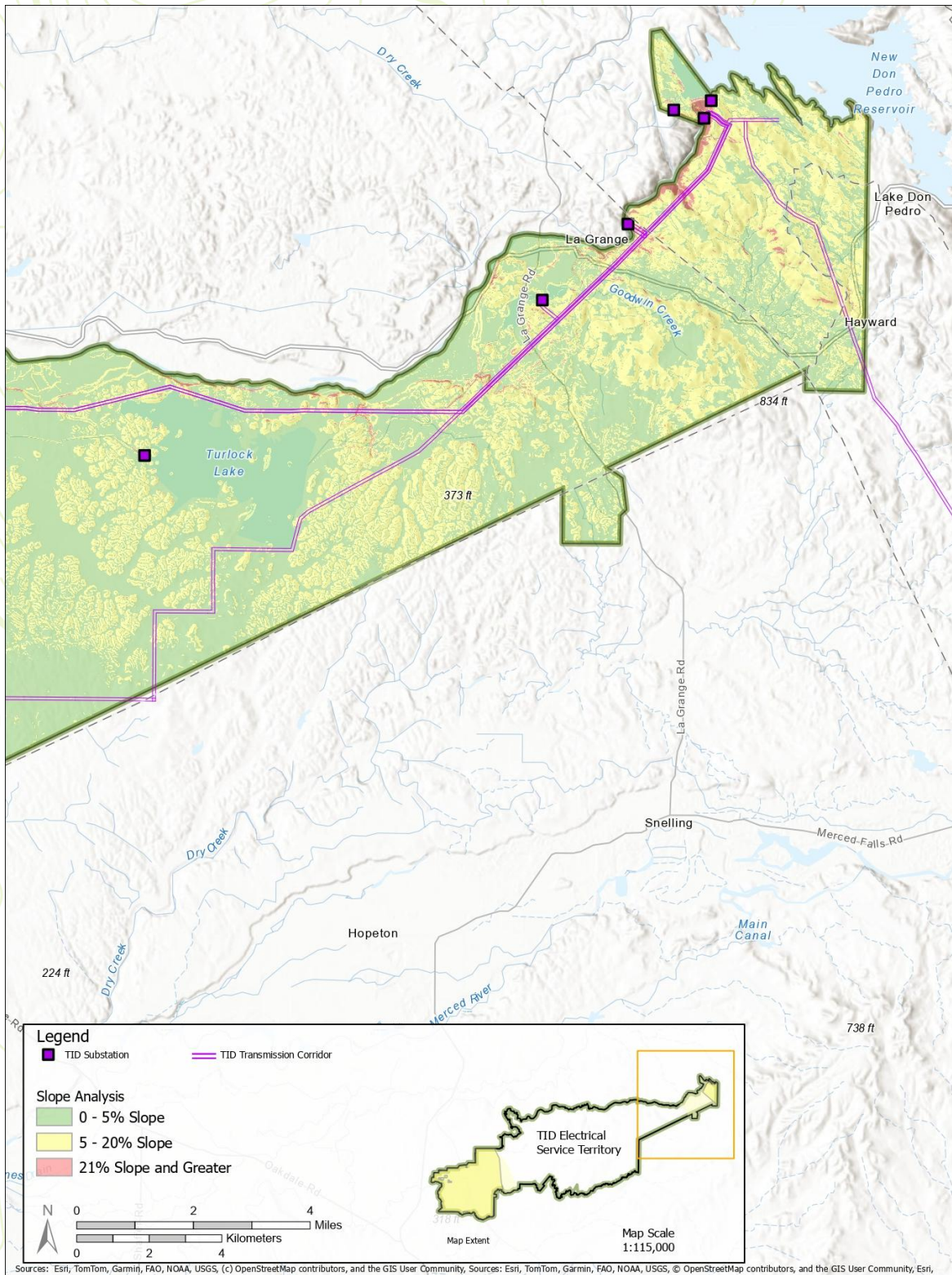


Figure 7: East Side Slopes

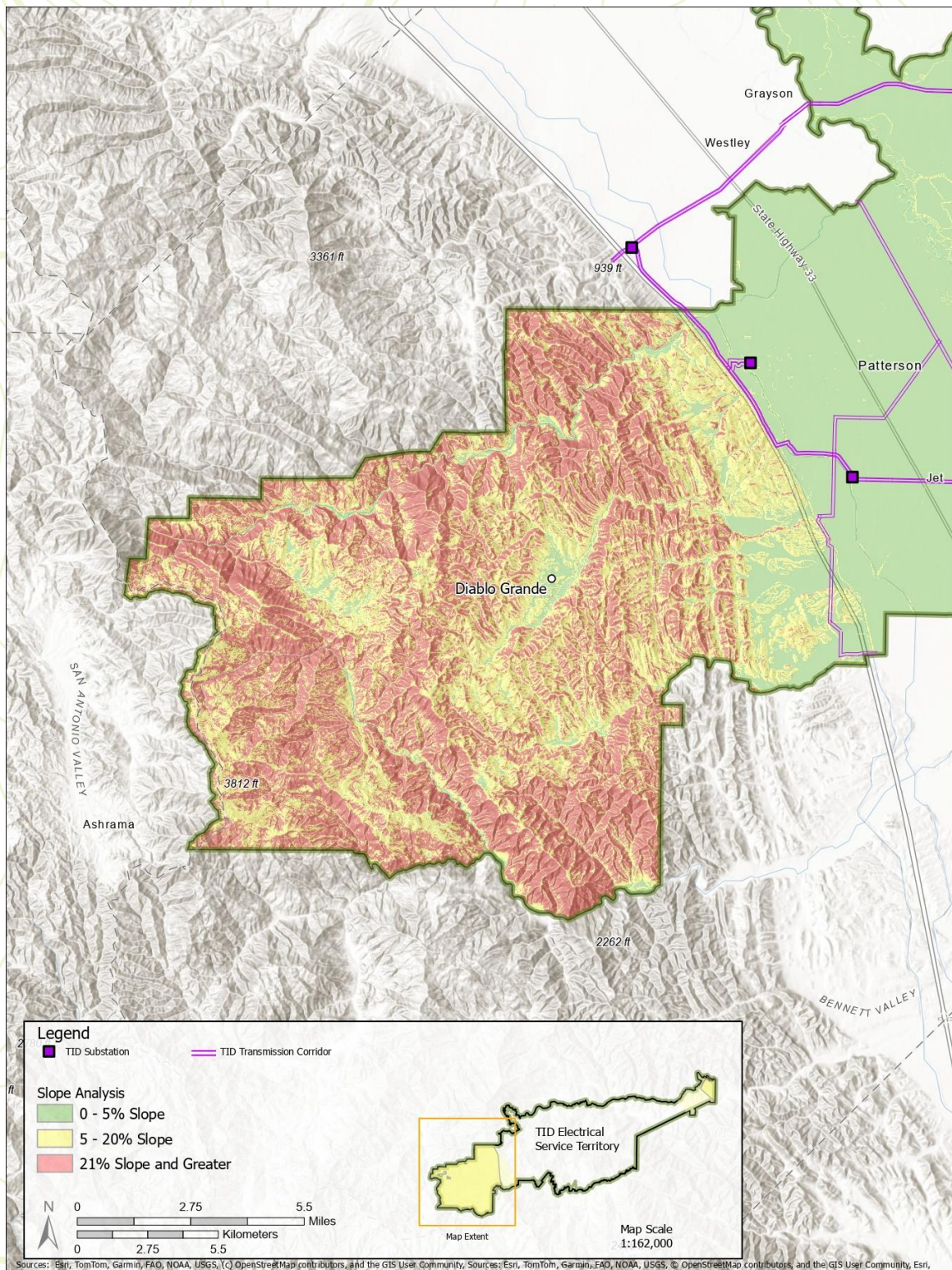


Figure 8: West Side Slopes

5.0 TID ASSETS IN FIRE ZONES

5.1 TID ASSETS

For purposes of risk assessment, TID assets consisting of substations, transmission and distribution electrical lines were considered as potential sources of wildfire ignition.

5.2 LOCATIONS OF FIRE ZONES

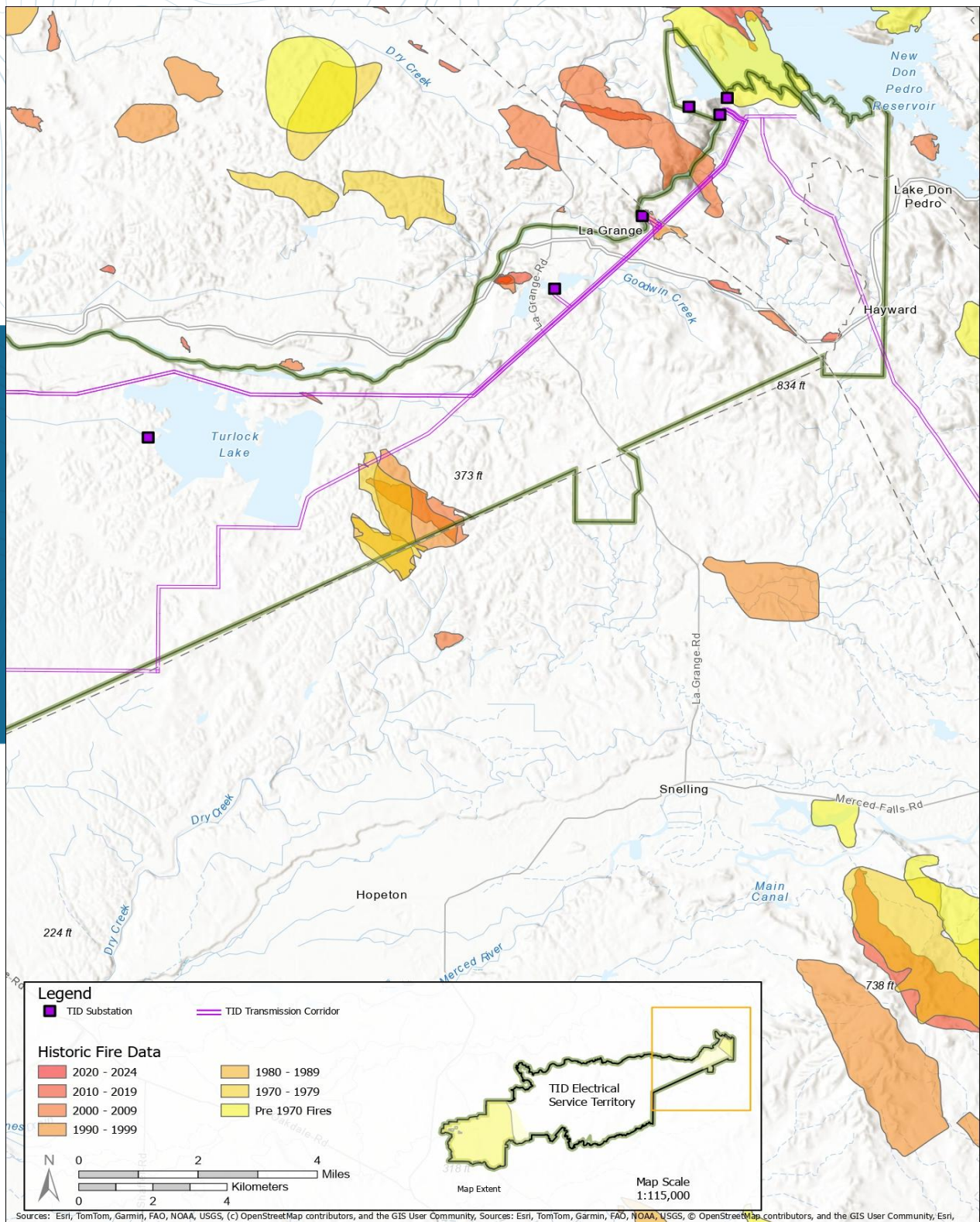
TID's service territory spans the Central Valley from the foothills of the Sierra (near Don Pedro Reservoir) to the crest of the Coast Range. TID's highest fire risk is at the far west end and far east end of the District (Figure 2). These areas are designated as State Responsibility Areas (SRAs) and Cal Fire standards apply to vegetation clearing and electrical equipment in these areas. Portions of these SRAs are also designated as Tier 2 by the CPUC. TID applies the more stringent of the two standards where overlaps occur. Figure 2 depicts areas where there is an elevated risk of utility associated wildfires. In Tier 2 areas, the CPUC has increased requirements for vegetation clearing and inspections. TID did not identify areas of High Fire Danger in addition to those indicated.

TID's service territory comprises a large area of Central Valley grassland and agricultural lands that are considered relatively low fire threat. To the west of I-5, and between Turlock Lake and Don Pedro Reservoir, vegetation comprises more shrubs and trees that constitute areas of high fire threat (Figure 3; East Side Fire Zone including La Grange, Figure 4: West Side Fire Zone including Diablo Grande). Each of these areas contain SRA and Tier 2 High Fire Threat Districts. TID has developed a Fire Zone Standard that applies to these two areas of increased wildfire risk. The Fire Zone standard requires that fuses, reclosers, and connectors be exempt, or if non-exempt equipment is used, flammable vegetation must be removed for 10 feet around the structure base. The Fire Zone Standard also requires that vegetation clearance at a minimum meet SRA and Tier 2 standards. Vegetation Management is addressed in more detail in Section 6.4 below.

Communities at risk in the TID Fire Zone include Diablo Grande and La Grange. Because of the concentrated population in these communities in the TID Fire Zone, these areas are the highest risk areas to public safety.

The CPUC Fire Map website shows that there is a history of small fires, predominantly in

grass lands but also including riparian areas along the Tuolumne River in the east side Fire Zone. TID's west side Fire Zone has an extensive history of large fires due to vegetation and terrain. The fire history does not include fires within La Grange or Diablo Grande (Figure 9: East Side Fire History, Figure 10: West Side Fire History).



6.1 HIGH FIRE THREAT DISTRICT

TID directly participated in the development of the California Public Utilities Commission's (CPUC) Fire-Threat Map which designates a High-Fire Threat District. In the map development process, TID served as a territory lead, and worked with utility staff and local fire & government officials to identify the areas of TID service territory that are at an elevated or extreme risk of power line ignited wildfire. TID has incorporated the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

6.2 WEATHER MONITORING

The TID Power Control Center monitors current and forecasted weather data from a variety of sources including:

- United States National Weather Service.
- National Fire Danger Rating System.
- National Interagency Fire Center – Predictive Services for Northern California.
- Local Fire District Warnings.
- Fire Weather Snooper – Identifies stations reaching critical wind and humidity thresholds.
- Initial Attack Viewer – Displays emerging wildfire incidents for early detection near TID assets.
- SOC Dashboard – Shows active fire perimeters, heat detections, and weather warnings.
- Technosylva 3-Day Fire Potential – Highlights areas with elevated fire-growth risk.

TID assigns one of two operating conditions based on the relevant weather data and knowledge of local conditions:

Normal: During normal conditions, no changes are made to operations or work policy.

Elevated: This condition is triggered by Red Flag Warnings issued by the National Weather Service. During elevated fire-risk conditions, TID crews and contractors take special precautions to prevent fire ignition and spread, including:

- Any crew working in the Fire Zone is required to carry a 200-gallon water tank.
- All crews are required to carry firefighting equipment, restrict use of tools or work methods that can produce sparks, and restrict vehicle operation in areas of flammable grasses.
- All automatic reclosing on lines that are within the Fire Zone is disabled.

6.3 DESIGN AND CONSTRUCTION STANDARDS

TID's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. TID treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities, and TID meets or exceeds all standards in GO 95. TID also monitors and follows the National Electric Safety Code as appropriate. TID ensures any new construction is designed to CPUC GO 95 grade A construction with a safety factor of four.

To reduce the potential for equipment causing wildfire ignition, Cal Fire specifies exempt and non-exempt equipment that can be used on electric facilities in Fire Zones. Exempt equipment is less likely to be a source of ignition and is preferred for Fire Zones. Where non-exempt equipment is used, Cal Fire requires removal of flammable vegetation around the base of structures (poles) to mitigate the potential for wildfire. TID originally tested poles in 2020 and tested again in 2025 instead of 2030. Every pole identified with internal wood decay was replaced with a fiberglass pole.

TID does maintain pole data height, age and class in our geographic information system (GIS) database. When utilities request to attach to TID poles they are required to provide loading data. TID will assess the loading data provided by the third party and ensure the appropriate mitigation measures are addressed prior to attachment.

TID's Fire Zone mitigation strategy begins with compliance with the SRA and CPUC requirements, but also includes additional actions to harden the electric system. Over the last year, and informed by experiences in the past, TID has increased inspections and upgraded equipment to ensure that design and construction are consistent with mitigating fire hazards. Below is an account of what was accomplished from 2019 through 2025 and what is planned and ongoing for 2026 and future years.

2019 Fire Zone Work

- Increased frequency of Fire Zone inspections.
- Coordinate with Cal Fire to review requirements.
- Non-exempt equipment identified and replaced. (Non-exempt equipment not replaced at 3 locations.)
- Lightning arrestors removed.
- Non-exempt switch removed.
- Vegetation removal completed.

**TID'S FIRE ZONE STANDARD APPLIES
THE MOST CONSERVATIVE FIRE PREVENTION
REQUIREMENT (WHETHER FROM CAL FIRE OR THE CPUC)
TO ALL LANDS WITHIN ITS FIRE ZONE.**

- 2,359 trees trimmed.
- Installed wire guards to protect against abrasion.
- Substation breakers and line reclosers in Fire Zone set to non-reclosing during red flag conditions.
- Notified landowners on their obligation to clear vegetation around low voltage wires that connect to their homes and businesses.
- Constructed communication system for remote control of Fire Zone equipment.

2020 Fire Zone Work

- Completed annual patrols.
- Trim and remove trees, with trimming as needed.
- Pilot test of drone-mounted infrared inspection of critical equipment.
- Initiate intrusive wood pole testing to identify poles that could fail and cause ignition.
 - 469 poles in TID's fire zones; Diablo Grande and La Grange.
 - Percent of failure rate for poles tested was 2.5%.

- TID replaced all failed poles.
- Trial use of steel or fiberglass poles to replace failed wood poles.
- Replace 12 kV copper conductors in Diablo Grande and La Grange with lower hazard aluminum and steel conductors.
- Increase wire clearance or installed animal guards to prevent animal-caused ignition.
- Began installing transformers with lower fire risk FR 3 vegetable-based fluid.

2021 Fire Zone Work

- TID evaluated undergrounding and tree wire and found these actions to not be warranted at this time.
- Began process to deploy weather station in Diablo Grande region with a targeted 2023 completion date.

2022 Fire Zone Work

- Continued process of deploying multiple weather stations in Diablo Grande region.
- Completed annual patrols in HFTD.
- Installed fault indicators in La Grange HFTD zone.

2023 Fire Zone Work

- Deployed a weather station in the Diablo Grande region of our service territory.

2024 Fire Zone Work

- Completed annual patrols in HFTD.
- Began looking to test satellite communications to assets in Del Puerto Canyon for another weather station.

2025 Fire Zone Work

- Deployed and commissioned two weather stations West of I-5. The first weather station is located just to the west of I-5 on Oak Flat Rd.
- The second weather station is located on Del Puerto Canyon Rd. at the Santa Clara County Line.

- TID has communications to the weather stations and bring the data into the Power Control Center for monitoring and alarming.
- The following weather data is brought in: Wind Speed, Temperature, and Relative Humidity.

2026 and Future Years Action Plan

In future years, TID plans to continue efforts to harden its electric equipment in the Fire Zones. New projects will build on lessons learned from each annual submission. TID continually monitors the development of new technology and is prepared to apply these advancements when it encounters appropriate opportunities. The following efforts are being prepared for future plan updates:

- Deploying weather stations in TID service territory.
- Install 4 additional reclosers in the East Side Tier 1 high fire threat area.
- Evaluate covered conductors and assess potential applicability to TID's high fire threat zones.
- Continue replacing wood poles with fiberglass poles in high fire threat zones.
- Will be conducting 5-year intrusive pole inspection for poles in fire zones.
- Bring into the Power Control Center EMS system weather data from existing deployments of weather stations at Don Pedro Reservoir, Dawson Power Plant, and Turlock Lake Power Plant.
- AiDash Vegetation Management Pilot: TID began a pilot project in the Hughson area to evaluate AiDash's Intelligent Vegetation Management System (IVMS), which uses high-resolution satellite imagery, artificial intelligence, LiDAR, weather data, and internal system information to monitor vegetation along power lines and identify risks such as grow-in and fall-in trees. The pilot achieved 100% confirmed results, demonstrating strong accuracy and reliability while also providing field-level tools to support documentation, verification, and coordination.
- Next Steps: TID will assess IVMS's work management capabilities to determine how the system can support planning, assignment, tracking, and verification of vegetation management activities with TID's tree trimming contractor across the District's service territory.
- Recloser Fire Season Settings: In preparation for fire season and potential Red Flag Warnings, TID developed more sensitive Group 2 protection settings for reclosers in designated fire zone areas. These settings allow reclosers to trip

faster and lock out instead of automatically reclosing, helping reduce wildfire ignition risk if a conductor falls to the ground.

- Automation Project: Currently, Electronics Technicians manually switch reclosers to Group 2 settings during Red Flag Warnings. TID Station Engineering, Electronics, and EMS are working to automate the process so PCC operators can place reclosers into a Red Flag state that automatically applies the correct settings, with full implementation targeted for 2027.

6.4 VEGETATION MANAGEMENT

TID meets or exceeds the minimum industry standard vegetation management practices. For 230kV transmission-level facilities, TID complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, TID meets:

- Public Resources Code Sections 4292; 4293, 4294, and 4296;
- Title 14 Section 1257 of California Code of Regulations;
- GO 95 Rule 35; and
- GO 95 Appendix E Guidelines to Rule 35.

These standards require significantly increased clearances in the High Fire Threat District. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. TID uses specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance. Figure 11 is an excerpt from TID's Fire Zone Standard and provides a graphic presentation of compliance with GO 95.

Fire Zone Ground Vegetation Removal:

In Fire Zone locations where non-exempt Fire Zone equipment must be used, flammable materials, grass, herbaceous and brush vegetation within 10 feet of the base of the pole must be removed. Additionally, within 10 feet of the base of the pole, limbs of living trees up to a height of 8 feet must be removed. Above 8 feet in height and within 10 feet of the pole, dead, diseased and dying limbs and foliage from living sound trees must be removed. Above 8 feet in height and within 10 feet of the pole, dead, diseased or dying trees must be entirely removed.

Removal of ground vegetation can also be accomplished with chemical treatment. Chemical treatments are performed by personnel with a Qualified Applicator License issued by the California Department of Pesticide Regulations.

Poles that require clearing will be marked with a visibility strip located 6 feet above ground.

Ground vegetation does not have to be removed if fire will not propagate, such as planted fields, vineyards, irrigated pasture, orchards, or marsh land.

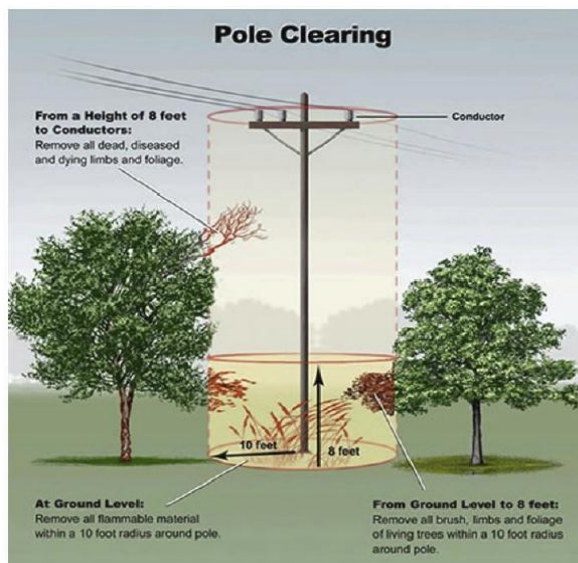


Figure 1

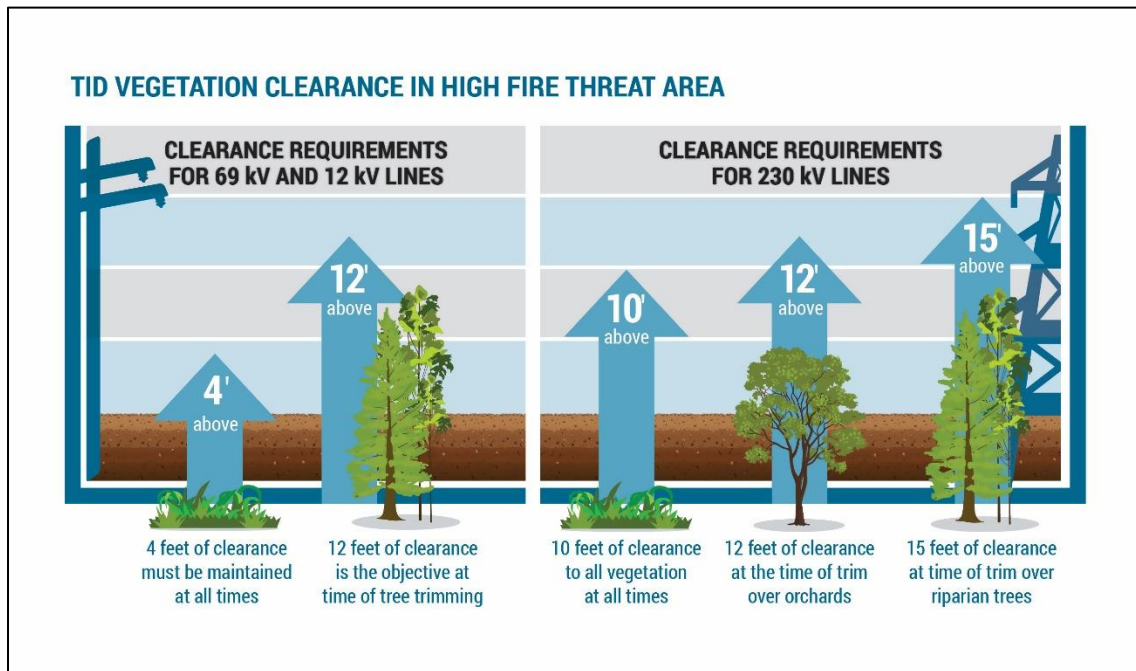
Fire Zone Line Patrols:

GO165 required line patrols will be performed annually in the Fire Zone.

FIRE ZONE	CONSTRUCTION STANDARDS		
	SHEET 3 OF 4	DWG. NO. 20900	A PAGE

Figure 11: Excerpt from TID Fire Zone Standard

Within the Fire Zone, TID performs an annual evaluation of every dangerous tree that has the potential to strike overhead facilities if it were to fail. In cases where dangerous trees (dead, dying, diseased or leaning) could strike the facilities, TID removes the tree or portion of the tree that poses a risk. TID also has a weed abatement program which is budgeted and utilizes herbicides around poles.



All State Responsibility Area requirements are incorporated into TID's Fire Zone Standard. SRA requirements are contained in Section 4292 and 4293 of the California Public Resources Code. Exemptions to the conductor clearance requirements are contained in Sections 4292, 4294, and 4296 of the California Public Resources Code. Exemptions are found in Title 14, Section 1257, of the California Code of Regulations. TID also references the Power Line Fire Prevention Field Guide published by Cal Fire.

The SRA radial clearance requirement between vegetation and electric lines is the same as GO 95 for 12 kV and 69 kV lines. There is no SRA recommended clearance at time of trim. The SRA requires the removal or trimming of trees, or portions of trees, that are dead, rotten, decayed or diseased and which may fall into or onto the line and trees leaning toward the line.

Cal Fire maintains lists of exempt and non-exempt equipment. Operation of non-exempt equipment can create electrical arcs and be a source of fire ignition. Therefore, if non-exempt equipment is used in the SRA, there are additional vegetation removal requirements around the base of the structure for 10 feet in all directions.

Cal Fire has requested a copy of the maps that TID maintains that show the location of all non-exempt structures in the SRA. While TID has replaced the majority of non-exempt equipment in the SRA, three non-exempt structures remain on the map.

TID owns and/or operates facilities that are outside of the TID service territory. Some of these facilities are in SRA areas and Tier 2 areas. Following is a list of these facilities, and a summary of the status of compliance with Cal Fire and CPUC requirements.

- Westley – Quinto and Westley – Tesla 230 kV Lines. TID is 50% owner of 0.3 miles of this double-circuit line that is west of Interstate 5 in an SRA. TID inspects this line twice a year and maintains the clearances required by NERC Standards.
- Westley – Tracy 230 kV Line. TID is 50% owner of this double-circuit line. 29.80 miles and only 8 miles of this line is located in an SRA. TID inspects this line twice a year and maintains the clearance required by NERC Standards.
- Don Pedro – Merced 69 kV Line. TID owns this 14 mile line. 6 miles of this line are in the TID service territory and Fire Zone, 8 miles are outside the TID service territory and in an area designated Tier 2 by the CPUC. This line is not presently in service. Nonetheless, TID is working to ensure that the 4 feet of required clearance is maintained.
- Mini Hydros. TID manages Woodward, Frankenheimer, Canal Creek, Parker, and Fairfield generating plants that interconnect with PG&E distribution lines. These facilities are located in SRAs outside the TID service territory. TID inspects and maintains these facilities in accordance with Cal Fire and CPUC Standards.

6.5 INSPECTIONS

TID Substations are inspected monthly for safety and reliability in compliance with GO 174.

Overhead system patrols and inspections are the responsibility of the Line Division Manager, Service Division. Underground system patrols and inspections are the responsibility of the Line Division Manager, Line Division.

TID inspects its 230 kV transmission lines twice per year. Any problems discovered, including those involving vegetation, are addressed promptly to ensure the safety and reliability of these facilities. Clearances to vegetation are maintained in accordance with NERC FAC-003-4.

Other transmission and distribution facilities, both overhead and underground, are inspected annually in urban areas, and every two years in rural areas, in accordance with the requirements of GO 165. During these inspections, problems are identified, prioritized and corrected. All facilities in the Fire Zone are patrolled annually in compliance with CPUC GO 165. TID staff use their knowledge of the specific environmental and geographic conditions to determine when areas require more frequent inspections. If TID staff discover a facility in need of repair that is owned by an entity other than TID, TID will issue a notice to the facility owner and work to ensure that necessary repairs are completed promptly.

TID is in the final year of a 10-year cycle to perform intrusive testing on all of its wood poles. The intrusive test looks for internal wood decay. Poles with insufficient strength to meet the GO 95 strength requirements are replaced. This year TID made a policy change and will now perform intrusive wood pole inspections in the fire zones every five years as opposed to ten. TID originally tested poles in 2020 and is concluding testing in 2026 instead of 2030. Every pole identified with internal wood decay will be replaced with a fiberglass pole.

Vegetation trimming along transmission and distribution lines is done primarily by TID contractors. The contractors are specialists, selected for their knowledge and



experience with work near energized electric lines. These contractors also have in-depth knowledge of various tree species, growth rates, and pruning methods that maintain tree health. Customers and property owners receive a phone call from TID informing them staff will be in the area inspecting and possibly trimming vegetation. TID trims so that minimum required clearances are maintained for a two-year trim cycle. If TID has discovered vegetation that has grown faster than expected staff will trim the trees and trim again if necessary, during winter and summer months. In TID's HFTD area inspections begin in late April to avoid rattlesnake season. Staff traversing HFTD areas are equipped with snake-proof leggings for safety. The town of La Grange is prioritized by TID due to it being in a HFTD and receives inspections every couple of months.

Detailed inspection and patrols identify problems that need correction. Maintenance tags are issued by the Line Department Manager and assigned to Line Division Managers to correct problems on a prioritized basis. Maintenance work is tracked by the Line Department, from the time problems are identified until corrected. All records of inspections and patrols, problems identified, and corrective actions tags issued and completed are maintained by the Line Department.

6.6 WORKFORCE TRAINING

TID linemen are members of the International Brotherhood of Electrical Workers. Electrical safety is integral to their livelihood and culture, as well as the safety of the public and the customers they serve. Any accident involving energized electrical facilities is a public hazard and a potential source of fire ignition. TID has training and work rules for its workforce to help reduce accidents, which also reduces the likelihood of wildfire ignition. Safely planning work is a daily exercise for linemen.

Lineman apprenticeship programs emphasize safety. Apprentices receive rigorous classroom and on the job training in electrical safety and safe work practices. TID's lineman apprentice program includes a module on vegetation management which includes the components of TID's Fire Zone Standard. Orientation is also provided on TID's 230 KV Transmission Vegetation Management Program which complies with NERC and WECC standards and requirements. TID linemen are also trained yearly on the use of fire extinguishers.

TID uses specialty contractors to trim vegetation from the vicinity of electric lines. TID's contract with the tree trimming contractor requires that employees follow a company safety program and that the equipment they use has spark arresters and is maintained so as to not initiate fires.

TID vehicles and equipment receive regular maintenance to reduce the likelihood of fire ignition from faulty brakes or metal in contact with the ground.

In the event of a fire TID staff have been known to assist Cal Fire in firefighting efforts.

6.7 RECLOSING POLICY

TID substation breakers can be set in a non-reclosing mode when desired. TID line reclosers can also be set in a non-reclosing mode when desired. This is done when needed for worker safety. TID substation breakers and line reclosers that feed into the Fire Zone are set in a non-reclosing mode during Red Flag Warnings.

6.8 PUBLIC SAFETY POWER SHUTOFF

TID has the authority to preemptively shut off power due to fire-threat conditions. This is referred to as a Public Safety Power Shutoff (PSPS), and this option will only be used in extraordinary circumstances. TID has identified switches that can be operated to shut off power to La Grange and Diablo Grande if the situation were to warrant it. However, there is no historical precedent for a situation in which a preemptive Public Safety Power Shutoff would have previously occurred. Compared to other parts of the state, most of TID's Fire Zone has less fuel and lower population density. Nonetheless, TID will make a case-by-case decision to shut off power based on the following considerations:

- Red Flag Warnings issued by the National Weather Service for fire weather zones that contain TID circuits.
- TID staff assessments of local conditions, including wind speed (sustained and gust), humidity and temperature, fuel moisture, fuel loading and data from weather stations.
- Forecasted wind gusts in excess of 56 miles per hour.
- Real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions.
- Input from fire experts and vegetation experts.
- Input from local and state fire authorities regarding the potential consequences of wildfires in select locations.
- Alternative ways to reroute power to affected areas.

- Awareness of evacuation orders in place.
- Expected impact of de-energizing circuits on essential services.
- Other operational considerations to minimize potential wildfire ignitions, including the blocking of reclosers on the identified circuit(s).
- On-going fire activity throughout TID and California.
- Ability to notify customers, local governments and public officials.
- Potential impacts to communities and customers.

TID's Power Control Center (PCC) Operators maintain continuous awareness of Red Flag Warnings and active fires using approved weather and wildfire-related resources. Primary monitoring begins with utilization of the Watch Duty platform and further resources include products from NOAA, NWS, Cal Fire, and WFTIC. These products include the following:

- Fire Weather Snooper – Identifies stations reaching critical wind and humidity thresholds.
- Initial Attack Viewer – Displays emerging wildfire incidents for early detection near TID assets.
- SOC Dashboard – Shows active fire perimeters, heat detections, and weather warnings.
- Technosylva 3-Day Fire Potential – Highlights areas with elevated fire-growth risk.

When active wildfires or Red Flag Warnings are present within TID's High Fire Threat Areas, our Power Control Center (PCC) takes immediate, preventative action to secure the grid and minimize ignition risks. All emergency actions are carefully tracked and recorded in our operational logs.

To protect our community and infrastructure, TID system operators execute the following standardized safety protocol:

- **Preventing Automatic Power Reclose:** Under normal conditions, our power grid is designed to automatically try to restore power if a line trips (for example, if a tree branch temporarily brushes against a wire). During high fire risk, we disable this automatic feature to prevent potential sparks.

Operators digitally lock specific circuits by placing "Do Not Close" safety tags on them until the severe weather passes. Auto reclosing is disabled for protection devices within the defined fire zones.

- **Increasing System Sensitivity:** Operators remotely activate heightened safety profiles on multiple automated switches (reclosers) throughout the La Grange area. Enabling these tags makes the power lines highly sensitive to disturbances, ensuring that power shuts off instantly if a fault is detected.
- **Regional Utility Coordination:** Wildfire safety requires continuous regional teamwork. During these critical periods, TID operators actively monitor communication channels and coordinate with neighboring utilities, such as PG&E, to answer questions and provide real-time status updates regarding impacted facilities.

During extreme fire weather, if a power line automatically shuts off due to a disturbance, our standard procedure is to keep the line de-energized. TID will not test the line by attempting to push power back through it. Instead, troubleshooter must physically patrol the affected line to ensure it is clear of damage or debris before power is restored.

Our system operators continuously track localized weather data and wind forecasts during fire threats. We take immediate, proactive steps if conditions severely worsen:

- **Field Assessments:** If wind gusts are forecasted to reach 56 mph or higher in High Fire Threat Areas, we immediately dispatch field experts (TID Troubleshooters) to assess real-time, on-the-ground conditions.
- **Rapid Chain of Command:** Field intelligence is rapidly escalated through our operations managers to Senior Management.
- **PSPS Decision Making:** Senior Management reviews the field reports alongside current temperature and humidity data. Based on this comprehensive view, they determine whether a preemptive Public Safety Power Shutoff (PSPS) is necessary to keep the community safe. Internal response teams are kept continuously updated throughout this process.

When an Active Fire is contained or a Red Flag Warning officially expires, TID begins a methodical process to safely restore normal grid operations. Senior Management, acting on recommendations from operations directors, gives the final approval to end any active PSPS events.

The restoration process includes:

- **Resetting Grid Sensitivities:** Operators remotely revert the power grid back to its standard operational state. This includes removing safety holds and turning automatic power restoration features back on.
- **Mandatory Safety Patrols:** If power was intentionally shut off during a PSPS (for example, in the Moccasin Point area), our field crews must complete a visual inspection of the lines. We must confirm no trees or branches have fallen on the wires before we can safely turn the lights back on.
- **Coordinating with Regional Partners:** If a PSPS involved interconnected facilities with PG&E, TID crews first patrol our local equipment. Once we verify our lines are clear and safe to re-energize, we digitally notify PG&E to authorize the restoration of regional power. For safety, PG&E will not restore power until TID gives this explicit all-clear.
- **Documentation:** Every step of the safety event, from weather monitoring to final restoration, is strictly logged for compliance, auditing, and continuous improvement of our safety protocols.

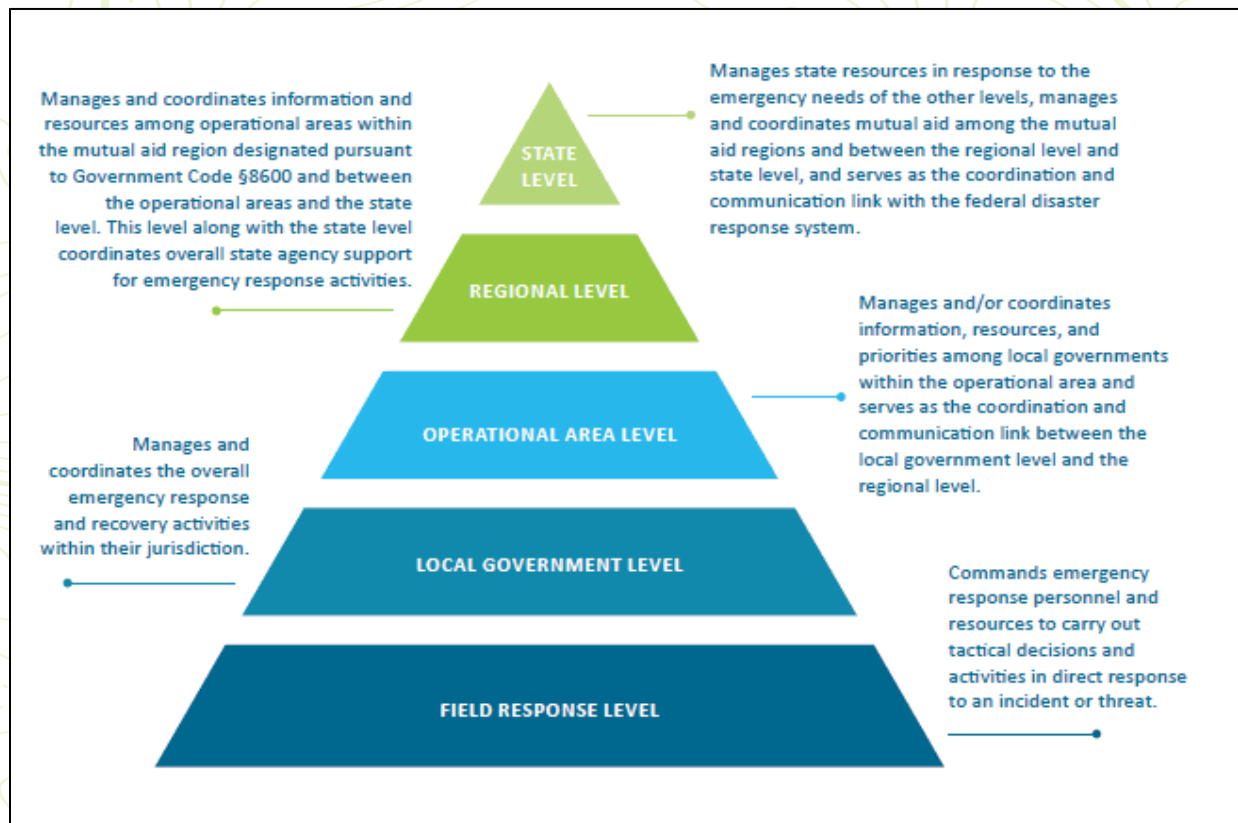
TID serves 36 meters at the far west end of the District along Del Puerto Canyon Road. TID's power for these customers is delivered from a line connected to PG&E that is located in a Tier 2 High Fire Threat District and could be subject to a PSPS. If PG&E notifies TID that they will de-energize these lines due to critical fire weather conditions and a threat to public safety, TID will immediately communicate that information to TID customers that will be affected by PG&E's PSPS.

In 2020 there were two PSPS events that occurred in the Diablo Grande and Del Puerto Canyon area. Both de-energizations resulted in 36 customers losing power and were restored in unison. The first de-energization was prompted due to the SCU Lightning Complex Fire. Customers impacted by the SCU Lightning Complex Fire were de-energized on August 17 and were re-energized on September 4 after restoration efforts concluded. TID was able to communicate timely information to the community of Diablo Grande as they became placed under an evacuation warning due to the collaborative efforts between TID, PG&E and other cooperating agencies. The second Diablo Grande de-energization occurred on October 26 and power was restored the next day.

7.0 PUBLIC AND AGENCY COMMUNICATION FOR POTENTIAL WILDFIRE OR POWER SHUT OFF

7.1 EMERGENCY PREPAREDNESS AND RESPONSE

Turlock Irrigation District follows and complies with obligations for communication and coordination pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations (Government Code section 8607) for emergency communications and support. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state. Pursuant to this structure, Turlock Irrigation District regularly coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies.



7.2 PUBLIC AND AGENCY COMMUNICATIONS FOR POTENTIAL WILDFIRE

The Turlock Irrigation District Board of Directors uses the SEMS, NIMS and ICS emergency preparedness protocols. TID's Wildland Fire Response Incident Action Plan (IAP) follows the National Incident Management System (NIMS) in addressing the five mission areas of Presidential Directive #8: prevention, protection, mitigation, response and recovery. TID's Wildland Fire Response IAP lists steps that should be considered if an uncontrolled wildland fire is approaching or occurring inside TID territory and threatening lives, property or District facilities. A copy of the Wildland Fire IAP is available by emailing TID at info@TID.org.

Should the Operational Area become active due to a wildfire, TID's Manager of Security and Emergency Preparedness, in consultation with the General Manager, would activate the Wildland Fire Incident Action Plan (IAP) and coordinate with other emergency responders throughout Stanislaus County, as well as California OES services and emergency personnel. The primary point of contact in a wildfire emergency would be Stanislaus OES.

If TID infrastructure or its ability to serve customers is affected by an incident, the District will respond at the field level first. If the incident cannot be resolved by field personnel, TID would activate the District Operations Center at the appropriate level and if necessary, contact Stanislaus or Merced County to coordinate an Operational Area response, per the SEMS structure.

Under the SEMS structure, and in coordination with public, private, and non-profit organizations, TID has done substantial advance preparation and planning with Stanislaus County. Stanislaus serves as the Operational Area. The Operational Area comprises the members of the Disaster Council as well as American Red Cross, broadcast industry, California Office of Emergency Services, community-based organizations, faith-based organizations, fire districts, hospitals, the Latino Emergency Council (LEC,) law enforcement, Mountain Valley EMSA, National Weather Service, non-governmental organizations, private industry, reclamation districts, the Salvation Army, schools, special districts, Stanislaus County departments, Stanislaus Regional 9-1-1, the United Way, and utility agencies. The Disaster Council includes representatives of the nine incorporated cities, a member of the Board of Supervisors, the County Chief Executive Officer and the County Fire Warden.

Turlock Irrigation District is a member of the California Utility Emergency Association, which plays a key role in ensuring communications between utilities during

emergencies. Turlock Irrigation District also participates in the Western Energy Institute's Western Region Mutual Assistance Agreement, which is a mutual assistance agreement covering utilities across a number of western states.

Additional details about Turlock Irrigation District's direction, control and coordination during an emergency, can be found in Section 7 of the Turlock Irrigation District Emergency Operations Plan.

7.2.1 PUBLIC AND AGENCY COMMUNICATIONS SCU LIGHTNING COMPLEX FIRE

In August 2020 TID activated its Wildland Fire Response IAP due to the SCU Lightning Complex Fire. The fire was caused by lightning strikes in the mountains above Adobe Springs. The District wrote IAPs for every day of the fire, with information capturing TID's efforts following the NIMS structure from mitigation and prevention, to recovery. The SCU Lightning Complex Fire lasted several days and the majority of the burn area in TID's service territory was low intensity. Residents in the community of Diablo Grande and those around the Adobe Springs area were placed under an evacuation warning due to the spread of the fire. TID communicated with customers who were de-energized through our TID Alerts notification system. Customers who were de-energized received continuous updates as TID coordinated communications with other agencies to assure consistent and correct messaging was conveyed throughout the duration of the fire.

District infrastructure in the Adobe Springs area, the Del Puerto Canyon Road lines, along with power poles, wires, transformers and other equipment were damaged as a result of the fire. Customers who were de-energized on August 17, 2020 were re-energized by September 4, 2020. The quick restoration of power for these customers was due to the efforts facilitated by TID staff who responded to the SCU Lightning Complex Fire. Post recovery efforts which include updates to TID's IAP, were included in TID's Hazard Mitigation Plan.

7.3 PUBLIC OUTREACH COMMUNICATIONS

TID has developed and initiated a multi-tiered outreach and public awareness strategy. At a broad level, TID has shared prepared messaging about TID's fire mitigation efforts. This information is available via the District's website (www.TID.org). TID publicized the availability of this information via The Wire, a newsletter distributed to TID electric customers. The District also brought attention to the available information and the TID Fire Mitigation Plan through social media, inviting the public to review and provide

comment on the Plan from August 1-31, 2019. The District also held a public workshop for the TID Board of Directors to further discuss the Fire Mitigation Plan and receive feedback.

Two community meetings were held in September and October of 2019 to address those specific communities (Diablo Grande and La Grange) that are located in the Fire Zone. Stanislaus County Office of Emergency Services and Cal Fire attended the Diablo Grande meeting, and Stanislaus County Office of Emergency Services attended the La Grange Meeting.

TID has continued to keep customers informed throughout 2020 with messaging about TID's fire mitigation efforts. At a November 19, 2020 workshop TID, along with six other utilities, were selected by the Wildfire Safety Advisory Board to present our wildfire mitigation plan. TID was selected due to our efforts towards meeting the objectives set forth by the Wildfire Safety Advisory Board for all publicly owned utilities wildfire mitigation plans. TID shared this development with our customers on the District's social media channels. In October 2021 the TID Water and Power Podcast highlighted measures taken by TID to protect customers from fire risk. For 2023 TID posted its wildfire mitigation plan for a public comment period prior to the plan's adoption.

7.4 COMMUNICATIONS PRIOR TO PUBLIC SAFETY POWER SHUTOFFS

In situations of high fire danger (i.e., dry conditions, high winds) the best mitigation to prevent wildfire may be to preemptively de-energize transmission or distribution lines ("Public Safety Power Shutoff"). Before shutting off power, there are significant impacts to public safety that need to be considered, including:

- Customers with electric medical equipment or medication that requires refrigeration needed to support life and health will lose the power needed to sustain these life-supporting measures.
- During a summer heat wave, high internal home temperatures resulting from lack of air conditioning may make homes uninhabitable.
- Communications are compromised. Cell phones cannot be recharged and landlines with battery modules will run out of power. Computers cannot be powered on, preventing use of the internet.
- Power to pump well water or charge public water systems is shut off, resulting in limited or no water.

- Critical service providers, such as police, fire departments, water and sewer utilities, communication utilities, medical facilities, and nursing homes will lose power if they are within the footprint of the area affected by the power shutoff.
- Traffic congestion from home and business owner evacuations may result. This congestion may compromise emergency responders' ability to access the area.
- Local businesses would be forced to cease operations.

TID has developed a system, TID Alerts, to notify customers of record in La Grange and Diablo Grande of Public Safety Power Shutoffs. Based on the historical record, TID does not anticipate that activation of this system for pre-emptive power shut off will be required. Nonetheless, TID will use all available communication methods in the event it foresees the need for a Public Safety Power Shutoff. Customers receiving TID Alerts have provided their contact preferences for use in an emergency. TID will use its automated emergency communication system to notify customers, if required.

To the west of Diablo Grande is a small group of customers within the TID service area adjacent to the west boundary of Stanislaus County that is supplied power via PG&E electrical lines that are located in a High Fire Threat area. If PG&E decides to de-energize this line due to public safety concerns in the PG&E territory, this would interrupt power to these customers in TID territory. If TID receives notice that these lines will be de-energized, TID will relay this notice to the TID customers that will be affected. To assist these customers in preparing for potential wildfire, the District mailed a letter to each of these customers. The letter asked customers to update contact information with TID to facilitate informing them of potential Public Safety Power Shutoffs. TID will continue the practice of mailing letters to customers whose power is supplied by PG&E electrical lines that are located in a High Fire Threat area when appropriate and will continue communication with these customers through the TID Alerts notification system.

Electrical lines can be de-energized through an unplanned fault in the system, to restore service after a wildfire or similar damage, or as a Public Safety Power Shut Off in the event of high fire danger.

8.1 UNPLANNED FAULT

In the event of a fault in the system, there are four steps to restoring service: Patrol, Repair, Test and Re-energize.

- **Patrol:** The system has to be patrolled to determine where and why an electric fault was detected by the recloser, breaker or fuse that caused the circuit to be de-energized. TID crews must investigate the de-energized line directly to determine if a tree limb, fallen pole or failed insulator resulted in the fault. If the problem can be quickly identified, such as with a vehicle accident in which information is also relayed to the TID Power Control Center through the California Highway Patrol or the local police department, the patrol can be accomplished quickly. However, in cases where the fault is unknown, and there are many miles of line to patrol, patrol may take hours.
- **Repair:** During patrol, crews look for potential damage to the lines and poles. Where equipment damage is found, additional crews are dispatched with new materials to repair or replace damaged equipment. Vegetation management crews may be required to clear downed trees or limbs before restoring service. Once a physical problem is located, repairs typically take between one and eight hours depending on the extent of damage.
- **Test:** Once the lines and poles are safe to operate, crews test the infrastructure by closing the fuse or breaker to re-energize the line segment.
- **Re-Energize:** After repairs are completed and tested, the system is re-energized and customers are alerted through the public communication system.

8.2 RESTORATION AFTER WILDFIRE

Restoration of service after a wildfire requires additional steps to assess the extent of damage, plan and mobilize for rebuilding poles or other infrastructure, and testing before re-energization. Depending on the extent of damage, repairs and restoration can take days to complete.

8.3 RESTORATION AFTER SCU LIGHTNING COMPLEX FIRE

Actions taken after the SCU Lightning Complex Fire in 2020 included re-routing distribution line to run along Del Puerto Canyon Road which, going forward, provides TID staff easy access for maintenance, tree trimming, and fire hardening. TID staff also replaced damaged wood poles with fiberglass poles in hard to access areas. Following the SCU Lightning Complex Fire it made the most sense for TID to re-route distribution line through a major thoroughfare as opposed to undergrounding due to the region's rocky topography.

8.4 RESTORATION AFTER PUBLIC SAFETY POWER SHUT OFF

In situations of high fire danger (i.e., dry conditions, high winds,) the best mitigation to prevent wildfire may be to preemptively de-energize transmission or distribution lines ("power shutoff").

Prior to a pre-emptive power shut off, TID will use all available communication methods in the event it foresees the need for a Public Safety Power Shutoff.

After the high fire danger has passed, all lines would have to be patrolled to ensure nothing is damaged during the outage. If damage was discovered, it would have to be repaired. Depending on the extent of line that was de-energized, this could take a day, or more, to patrol. After the patrol was complete, if no damage was discovered, the system would be tested and restored to service.

Public Safety Power Shutoffs, as they occur, may result in long durations of loss of electric service, lasting at least a few days. If the extreme weather conditions that trigger the power shut off last for multiple days, the patrol takes a day, and repairs take a day, the outage could last multiple days. Public Safety Power Shutoffs will not be a short service interruption.

9.1 ROLES AND RESPONSIBILITIES FOR PLAN EXECUTION

This section identifies TID's management responsibilities for overseeing this WMP and includes the operating departments and teams responsible for carrying out the various activities described in the previous chapters. This section also identifies the controllable metrics which are used to demonstrate compliance with this WMP.

TID's Assistant General Manager for Electrical Engineering and Operations has overall responsibility for the WMP. The Assistant General Manager for Water Resources, The Assistant General Manager for Financial Services, and the Manager for External Affairs have responsibility for components of the WMP as follows:

The General Manager is responsible for:

- The General Manager directs the Chief Operating Officer who directs the Assistant General Managers and Assistant General Manager for Electrical Engineering and Operations, the Assistant General Manager for Water Resources, the Assistant General Manager of Financial Services, and the Manager for External Affairs in the development and implementation of the Wildfire Mitigation Plan.

The Assistant General Manager for Electrical Engineering and Operations directs the following:

- Overall Responsibility for Implementation of the WMP.
- Tree trimming to maintain clearances required by TID Standards. Vegetation removal at base of poles in accordance with TID Standards.
- Power Control Center weather monitoring for Red Flag Warnings.
- Power Control Center implementation of non-reclosing for breakers and reclosers during Red Flag Warnings
- Collection and analysis of outage statistics and fire incidents in the TID Fire Zone.

The General Manager or Designee directs:

- Interagency communication and coordination during the occurrence of a wildfire

event in accordance with the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations.

The Manager for External Affairs directs:

- Public communication regarding prevention of wildfire and preparation for a wildfire event.

Table 4 lists Departments and Workgroups that are responsible for various components of the WMP.

Table 4: Accountability of the groups responsible for the Wildfire Management Plan Components

WMP Requirement	Responsible Department / Workgroups
Develop Fire Zone Standard	Assistant General Manager, Electrical Engineering and Operations
Vegetation Management	Line Division Manager, Vegetation Management
Substation Inspections	Maintenance and Operations Department Manager
Overhead Line Inspections and Patrols	Line Division Manager, Service Division
Underground Line Inspections and Patrols	Line Division Manager, Line Division
Wood Pole Intrusive Inspection	Electrical Engineering and Operations Department Manager, Line Engineering
Maintenance Tag Work	Line Division Manager, Line Division
Non-reclosing during red flag warnings	Electrical Engineering and Operations Department Manager, Power Control Center Department Manager, Line Division Manager, Service Division
Equipment Standards	Electrical Engineering and Operations Department Manager, Line Engineering
Work Order Preparation for System Hardening	Electrical Engineering and Operations Department Manager, Line Engineering
Implement Work Rules for Red Flag Warnings	Line Department Manager

WMP Requirement	Responsible Department / Workgroups
Planned De-energization	Electrical Engineering and Operations Department Manager, Power Control Center
System Restoration	Electrical Engineering and Operations Department Manager, Power Control Center Line Division Manager
Outage Metric Analysis	Line Department Manager Electrical Engineering and Operations Department Manager, Line Engineering
Emergency Plan Activation	Manager of Security and Emergency Preparedness
Public and Agency Communication	Communications Division Manager

9.2 METRICS FOR MEASURING PLAN PERFORMANCE

The following Tables consist of wildfire metrics TID is tracking which measure the WMP plan performance. TID plans to utilize this data to inform future wildfire mitigation investments.

Table 5: External Risk Metrics								
Metric type	External Risk Event	2021	2022	2023	2024	2025	Unit(s)	Comments
1. Red Flag Warning Days	Red Flags Warning Days* for Weather Zone that includes Utility Service Territory	20	6	2	6	4	#Days	Summation of TID's service area
2. [Particularly Dangerous Situation (PDS)/Extreme Fire Threats]	[PDS/Extreme Threat] Days for Weather Zone that includes Utility Service Territory	0	0	0	0	0	#Days	No extreme fire threats reported
3. Wind Conditions	High Wind Warning Days* in Weather Zone that includes Utility Service Territory	0	0	0	0	0	#Days	No high wind warning days reported

4. Increase of Customers/Infr astructure in High-Risk Areas	Circuit Miles in [high risk area as defined by POU]	0	0	0	0	0	#Miles	
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Table 5 Continued: Performance Metrics

Metric type	Progress metric name	Actual 2020	Actual 2021	Actual 2022	Actual 2023	Actual 2024	Actual 2025	Unit(s)	Comments
1.Distribution Inspections	Patrol Inspections <i>Performed</i>	39.4	39.4	39.4	39.4	39.4	39.4	# circuit miles	
	Intrusive Inspections <i>Performed</i>	82	0	0	0	82	0	# circuit miles	
	Routine Vegetation Manageme nt <i>Performed</i>	39.4	39.4	78.8	78.8	78.8	78.8	# circuit miles	Circuit miles are doubled in 2022 as line crews went through inspections twice in the year.
2.Transmission Inspections	Patrol Inspections <i>Performed</i>	66.9	66.9	66.9	66.9	66.9	66.9	# circuit miles	
	Intrusive Inspections <i>Performed</i>	4	0	0	0	0	0	# circuit miles	
	Routine Vegetation Manageme nt <i>Performed</i>	66.9	66.9	133.8	133.8	133.8	133.8	# circuit miles	Circuit miles are doubled in 2025 as line crews went through inspections twice in the year.

Table 5 Continued: Outcome Metrics

Event Category	Cause category	2019 HFTD	2020 HFTD	2021 HFTD	2022 HFTD	2023 HFTD	2024 HFTD	2025 HFTD	Unit(s)	Comments
	Contact from object - Distribution (non vegetation)	0	0	0	1	0	0	0	# outages	

Outage Event - Distribution	Vegetation caused - Distribution	0	0	0	0	0	0	0	# outages	
	Equipment / facility failure - Distribution	0	2	1	0	0	0	1	# outages	
	Wire-to-wire contact - Distribution	0	0	0	0	0	0	0	# outages	
	Contamination - Distribution	0	2	0	0	0	0	0	# outages	
	Utility work / Operation	0	0	0	0	0	0	3	# outages	
	Vandalism / Theft - Distribution	0	0	0	0	0	0	0	# outages	
	Other-Distribution	0	3	5	3	1	0	0	# outages	Due to cust. non pay
	Unknown-Distribution	0	1	1	1	0	0	0	# outages	
Outage Event - Transmission	Contact from object - Transmission	0	0	0	0	0	0	0	# outages	
	Vegetation caused - Transmission	0	0	0	0	0	0	0	# outages	
	Equipment / facility failure - Transmission	0	0	0	0	0	0	1	# outages	
	Wire-to-wire contact - Transmission	0	1	2	1	0	0	0	# outages	
	Contamination - Transmission	0	3	5	1	0	0	0	# outages	
	Utility work / Operation	0	0	0	0	0	0	0	# outages	
	Vandalism / Theft - Transmission	0	0	0	0	0	0	0	# outages	
	Other-Transmission	0	1	0	2	0	0	0	# outages	
	Unknown-Transmission	4	9	4	6	0	0	6	# outages	

Utility-Caused Ignitions Distribution	Contact from object - Distribution	0	0	0	0	0	0	0	# ignitions	
	Vegetation caused - Distribution	0	0	0	0	0	0	0	# ignitions	
	Equipment / facility failure - Distribution	0	0	0	0	0	0	0	# ignitions	
	Wire-to-wire contact - Distribution	0	0	0	0	0	0	0	# ignitions	
	Contamination - Distribution	0	0	0	0	0	0	0	# ignitions	
	Utility work / Operation	0	0	0	0	0	0	0	# ignitions	
	Vandalism / Theft - Distribution	0	0	0	0	0	0	0	# ignitions	
	Other-Distribution	0	0	0	0	0	0	0	# ignitions	
	Unknown-Distribution	0	0	0	0	0	0	0	# ignitions	
Utility-Caused Ignitions Transmission	Contact from object - Transmission	0	0	0	0	0	0	0	# ignitions	
	Vegetation caused - Transmission	0	0	0	0	0	0	0	# ignitions	
	Equipment / facility failure - Transmission	0	0	0	0	0	0	0	# ignitions	
	Wire-to-wire contact - Transmission	0	0	0	0	0	0	0	# ignitions	
	Contamination - Transmission	0	0	0	0	0	0	0	# ignitions	
	Utility work / Operation	0	0	0	0	0	0	0	# ignitions	
	Vandalism / Theft - Transmission	0	0	0	0	0	0	0	# ignitions	
	Other-Transmission	0	0	0	0	0	0	0	# ignitions	

	Unknown-Transmission	0	0	0	0	0	0	0	# ignitions	
Vegetation Management (No Outage/Ignition)	Offcycle Treatment - Distribution	1585	1585		1585	1585	1585	1585	# poles	Pole base clearing
	Offcycle Treatment - Transmission	79	79	79	79	79	79	79	# poles	Fire break clearing around tower
System wide Information	SAIDI	59	56	75	68	61	49	62	All Events, # minutes/year	2025 Data available Jan '26
	SAIFI	0.59	0.57	0.88	0.5	.63	.52	.66	All Events, # times/year	2025 Data available Jan '26

9.3 IMPACT OF METRICS ON PLAN

TID has always kept records of ignitions and other fire related data. Going forward, more information will be collected specific to the metrics outlined in the data conveyed in Section 9.2. As the data collection history becomes more extensive, TID will be able to identify areas of its operations and service territory that are disproportionately impacted. TID will then evaluate potential improvements to the plan.

9.4 IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

TID staff are constantly evaluating best wildfire mitigation practices throughout the year. If deficiencies are identified with existing activities, TID Management will direct immediate corrective efforts to improve work activities upon discovery of a deficiency. The annual and comprehensive review, redevelopment, and resubmission of the plan will also result in continual improvement to the Wildfire Mitigation Plan.

9.5 MONITORING THE EFFECTIVENESS OF INSPECTIONS

GO 165 requires detailed inspection for distribution facilities that range from three to five years, and patrols for distribution facilities at intervals that range from one to two years, depending on the type of equipment and location (e.g., rural or urban). TID's patrols for all overhead equipment in the Fire Zone must be conducted annually.

Problems that are identified during inspections are prioritized for correction. TID tracks inspections and resulting maintenance tags throughout the process. Inspection findings will be examined to identify trends and recurring problems. Findings are combined with

performance analysis metrics to evaluate changes to design, construction or maintenance standards and practices that could improve overall performance, safety and reliability of the electric system.

10.0 INDEPENDENT EVALUATION

TID has selected a qualified independent auditor to evaluate TID's WMP. The independent auditor has been selected through a request for qualification, consistent with TID's current procurement practice to identify the best qualified independent evaluator. TID has made the independent evaluation report available to the public via the District's website (www.tid.org).

Appendix 1 – Key Wildfire Mitigation Initiatives

<i>Key Initiatives</i>	
Situational Awareness and Forecasting	2026 Reporting Period Goals • Integrate AiDash technology for utilization across TID service territory.
Grid Hardening	2026 Reporting Period Goals • Conclude intrusive pole inspections and replace wood poles with fiberglass poles in TID fire zones. • Work to automate reclosers to Group 2 settings during Red Flag Warnings.

Independent Evaluator's Report

Turlock Irrigation District 2026-2028 Wildfire Mitigation Plan

SEPTEMBER 2026

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CAL FIRE	California Department of Forestry and Fire Protection
CPUC	California Public Utilities Commission
FEMS	Fire Environment Mapping System
FHSZ	Fire Hazard Severity Zone
GIS	Geographic Information System
HFTD	High Fire-Threat District
IEMS	Iowa State University Mesonet
LRA	Local Responsibility Area
NWCG	National Wildfire Coordinating Group
OEIS	California Office of Energy Infrastructure Safety
PG&E	Pacific Gas and Electric Company
POU	Publicly Owned Electric Utility
PSPS	Public Safety Power Shutoff
PUC	Public Utilities Code
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SME	Subject Matter Expert
SRA	State Responsibility Area
T&D	Transmission and Distribution
TID	Turlock Irrigation District
WFTIIC	Wildfire Forecast & Threat Intelligence Integration Center
WMP	Wildfire Mitigation Plan
WSAB	Wildfire Safety Advisory Board

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1 Introduction

Publicly owned electric utilities and electric cooperatives in California are required to construct, maintain, and operate their electrical equipment in a manner that minimizes the wildfire risk posed by this equipment. This requirement includes preparing a Wildfire Mitigation Plan (WMP) that documents the utility's understanding of wildfire risk and risk drivers in its service territory, as well as the wildfire risk-reduction strategies it uses to mitigate these risks. Publicly owned electric utilities and electric cooperatives are further required to have their WMP evaluated by a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure.

Dudek's fire prevention team worked with the Turlock Irrigation District (TID) to review its current WMP, evaluate its ongoing and new wildfire mitigation strategies, and prepare this Independent Evaluator's Report for TID's 2026–2028 WMP.

1.1 Scope and Intent

Dudek worked with TID to prepare this Independent Evaluator's Report to satisfy the requirements of Public Utilities Code (PUC) Section 8387(c). This report is specific to TID's 2026–2028 Wildfire Mitigation Plan. It reviews the elements of the WMP and presents the results of Dudek's review of data provided by TID and publicly available data regarding wildfire risk in TID's service territory and TID's wildfire risk-reduction strategies. Dudek's review assessed the following elements:

- i. Regulatory Requirements
- ii. TID's understanding of the wildfire risk and risk drivers in its service territory
- iii. TID's wildfire mitigation strategies

This Independent Evaluator's Report is intended to satisfy the requirements of the PUC and provide TID with an assessment of the comprehensiveness of its WMP. Recent guidance from the California Wildfire Safety Advisory Board (WSAB) indicated that its current focus areas are risk identification and preemptive de-energization (WSAB 2025). Therefore, Dudek's independent evaluation of TID's WMP also focuses on risk identification and preemptive de-energization.

1.2 Changes to the WMP Submittal Process

The Wildfire Safety Advisory Board published several guidance documents in late 2025 and early 2026 that included information about changes to the WMP submittal process for publicly owned electric utilities. Changes to PUC Section 8387 revised the submittal requirement for POU WMPs from annually to every two years. To distribute the WMP review workload, the WSAB modified the submission dates for POU WMPs. The WSAB's new guidance establishes a staggered submittal process in which a select group of POUs submits WMPs each year for WSAB review. The WSAB published the final WMP submittal schedule in March 2026 for more than 50 California public electric utilities. The state's public utilities were divided into groups, and each group was assigned a final submittal

date in the first week of October for the 2026–2028 version of each utility's WMP. TID is in the group whose WMPs are due on October 2, 2026. Under the new WMP submittal guidance, TID will not be required to resubmit its WMP to the WSAB for review until 2028.

The changes to the WSAB submittal schedule do not affect the requirement in PUC Section 8387(b)(3) to present the WMP at a properly noticed public meeting to accept comments from the public and other agencies. Before submitting its 2026–2028 WMP, TID staff will present the WMP at a public meeting.

1.3 Qualifications of the Independent Evaluator

PUC Section 8387(c) states that a public electric utility must contract with a qualified independent evaluator with experience assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its WMP.

Dudek's Fire Prevention Planning team has prepared independent evaluator reports, wildfire risk assessments, and wildfire mitigation plans for publicly owned electric and water utilities and independent transmission operators since the State of California began requiring these plans for publicly owned utilities in 2019. Additionally, Dudek has worked with and prepared fire-prevention planning documents for new energy projects across California and the Pacific Northwest. Our Fire Prevention Planning Team includes National Fire Protection Association Certified Wildfire Mitigation Specialists and Fire Protection Engineers.

1.4 Assessment Methods

Dudek fire prevention planners prepared this Independent Evaluator's Report using TID's draft 2026–2028 Wildfire Mitigation Plan, as well as the following documents and datasets from TID:

- Draft PSPS Circuit Recommendations
- Outage data tables
- Fire incident and wire-down data tables
- Emergency operations data tables
- WMP metric data tables
- GIS datasets of TID circuits and facilities

These datasets, in combination with TID's 2026–2028 WMP, were used to evaluate TID's service territory, utility-ignited wildfires and potential ignition events, and the wildfire risk drivers described in the WMP. Dudek also used publicly available datasets, including:

- Weather and climate data (FEMS, WFTIIC, IEMS)
- Fuels and fire-danger data (FEMS, WFTIIC)

- Local fire history (CAL FIRE)
- PG&E local fire history (CPUC)

These datasets were used to assess the fire environment in TID's service territory and to independently verify the fire risk factors described in the WMP.

2 TID Service Territory

2.1 TID Service Territory Fire Environment Summary

Turlock Irrigation District's service territory covers 662 square miles within and outside the Turlock city limits. It extends across the San Joaquin Valley—from the crest of the Coast Range, across the Central Valley, to the Sierra Nevada foothills adjacent to Don Pedro Reservoir (Figure 1, Turlock Irrigation District Service Territory). Due to a combination of terrain, vegetation, and weather conditions, TID's service territory experiences frequent wildfires during the summer. Fire risk is higher in the portions of TID's service territory that encompass the Coast Range west of Patterson and the Sierra Nevada foothills to the east. These areas are known as the West Side Fire Zone and East Side Fire Zone, respectively (Figure 2, West Side Fire Zone, including Diablo Grande; and Figure 3, East Side Fire Zone, including La Grange). Grassland communities dominate the vegetation in both fire zones, with chaparral, shrubland, and woodland also present. If a fire starts in these zones, the additional fuel load and limited firebreaks can support a fast-moving, high-intensity fire that is difficult to control. Additionally, slopes within the West Side and East Side Fire Zones are steep: the East Side Fire Zone has moderate slopes ranging from 0% to 20%, while slopes in the West Side Fire Zone exceed 20%. This topography, combined with vegetation-related fire risk, increases the fire hazard in these areas. In contrast, the portion of TID's service territory within the Central Valley has flat to moderate slopes and is dominated by agricultural land uses and urban development. These land-use types result in lower fire risk because of irrigation, limited combustible vegetation, and fewer steep slopes.

Turlock, like most of the San Joaquin Valley, experiences hot, dry summers and cool, wet winters. Summers are consistently hot and dry, and there is always a heightened risk of fires in the summer and into the fall before the rainy season begins—even in an average or wet year. During dry years, the fire risk can extend into the winter and through the spring. While wet winters can delay the ignition of significant fires until later in spring or early summer, they also promote more vegetation growth and may therefore produce higher fire risk during the inevitable hot, dry summer season. Fire season in the TID service area—the period of the year when wildfires occur most frequently based on historical fire occurrence—has historically extended from early spring through late fall (NWCG n.d.), after annual grasslands and herbaceous cover have cured. The potential for extreme fire behavior, as indicated by Red Flag Warnings issued by the National Weather Service, occurs during most of the region's fire season, from June to October (IEMS n.d.). Due to drier conditions and increasing urban development in fire-prone areas, however, fire protection and mitigation are becoming year-round necessities.

The TID service area has experienced numerous wildfires, including overlapping historical fire perimeters in the mountainous terrain of the West Side Fire Zone and some fire history in the East Side Fire Zone. A total of 48 fires have been recorded within TID's service territory. The Coast Range within the West Side Fire Zone has the most extensive fire history, with 30 recorded wildfires; the most recent were the 2025 Grande Fire (12 acres) and the 2025 Fink Fire (12 acres). The most significant recent wildfire recorded in the West Side Fire Zone is the 2020 SCU

Lightning Complex Fire. Approximately 65,733 acres of the fire's total 393,624 acres burned within the West Side Fire Zone. The East Side Fire Zone has 16 recorded fires. The most recent was the 2025 Grange Fire (19 acres), and the most significant recent wildfire was the 2008 La Grange Fire. Approximately 196 acres of the fire's total 1,334 acres overlapped the East Side Fire Zone. Two fires occurred along the San Joaquin River near the northwestern boundary of TID's service territory (CAL FIRE 2026).

2.2 Fire Hazard Severity Zones

CAL FIRE designates areas of the state with increased wildfire hazard based on previous fire occurrence and anticipated fire behavior. These areas are designated as fire hazard severity zones (FHSZs). FHSZs are present in portions of TID's service territory that overlap the Coast Range and Sierra Nevada but are not present in the Central Valley portions of the service territory. Most of the West Side Fire Zone consists of State Responsibility Area (SRA) designated as Very High FHSZ. SRA High FHSZ areas and much smaller SRA Moderate FHSZ areas are also present. Local Responsibility Area (LRA) designated as Very High FHSZ is present along the western side of the City of Patterson and continues approximately 3 miles south along the east side of Interstate 5. Smaller outer bands of LRA High and Moderate FHSZ are adjacent to the LRA Very High FHSZ areas. The East Side Fire Zone contains SRA Moderate, High, and Very High FHSZ areas. The SRA Moderate FHSZ is above Turlock Lake, while much of the SRA High FHSZ is east of Turlock Lake and extends into the foothills. SRA Very High FHSZ areas are located in the portion of TID's service territory near Don Pedro Reservoir.

Most of TID's transmission corridors are within the Central Valley, which does not have a CAL FIRE FHSZ designation. Portions of these corridors run parallel to the SRA Very High FHSZ within the West Side Fire Zone but are not located within it. Transmission corridors and distribution lines do pass through SRA Moderate, High, and Very High FHSZ areas in the northeastern portion of TID's service territory and into the East Side Fire Zone. Distribution lines are also located within the West Side Fire Zone, primarily in SRA Very High FHSZ areas. Underground distribution lines are present in the SRA Very High FHSZ areas and adjacent SRA High FHSZ areas in both the West Side and East Side Fire Zones; however, their total extent is substantially less than that of the transmission corridors and overhead distribution lines. Figure 5, Fire Hazard Severity Zones, shows the FHSZs and the locations of transmission corridors and distribution lines within TID's service territory.

2.3 High Fire Threat Districts

The California Public Utilities Commission (CPUC) designates areas with an increased risk of utility-associated wildfires as High Fire-Threat Districts. The West Side and East Side Fire Zones contain areas designated as Tier 2 High Fire-Threat Districts (HFTDs). These areas overlap SRA lands with the FHSZ designations described above. The nearest Tier 3 HFTD areas are approximately 11 miles northeast of the East Side Fire Zone, east of Don Pedro Reservoir. The Tier 3 HFTD areas closest to the West Side Fire Zone are on the opposite side of the Coast Range, west of Morgan Hill and Gilroy, approximately 22 miles southwest of the West Side Fire Zone.

As shown on the FHSZ maps, the distribution lines and underground distribution lines described above are also located within Tier 2 HFTD areas. However, some underground distribution lines in the East Side Fire Zone near Don Pedro Reservoir are outside the Tier 2 HFTD areas. Figure 6, High Fire-Threat Districts, shows the HFTDs and the locations of transmission corridors and distribution lines within TID's service territory.

3 Independent Evaluator Review of Regulatory Compliance

Public Utilities Code (PUC) Section 8387 creates two requirements for each publicly owned electric utility (POU) in California. First, each POU is required to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes wildfire risk. Second, each POU is required to prepare a wildfire mitigation plan and submit it to the California Wildfire Safety Advisory Board (WSAB) in accordance with the applicable submission schedule.

PUC Section 8387 contains several subsections that identify the elements required in WMPs prepared by POUs. Publicly owned utilities have prepared WMPs since 2019 and, with support from power-agency associations, have consistently produced plans containing the elements required by PUC Section 8387(b)(2). Table 1 lists each required element and identifies where it appears in TID's 2026-2028 WMP.

Table 1. PUC 8387(b)(2) Required Element Table and Location in TID WMP

PUC 8387 Subsection¹	PUC 8387 Required Element Description	WMP Section and Page No.	Section Title
(b)(2)(A)	Person responsible for executing the plan	3.3 Page 17 ; 9.1 Pages 56-58	Utility Governance Structure, Roles and Responsibilities
(b)(2)(B)	Objectives of the wildfire mitigation plan	1.2 Page 6	Purpose
(b)(2)(C)	Identification and prioritization of risks; preventive strategies	6.0	Wildfire Preventative Strategies
(b)(2)(D)	Evaluation of plan performance, including metrics	9.2 Pages 58-62	Metrics for Measuring Plan Performance
(b)(2)(E)	Description of how metrics inform plan improvements	9.3, Page 62	Impact of Metrics on Plan
(b)(2)(F)	Protocols for de-energization	6.8 Pages 45-47	Public Safety Power Shutoff
(b)(2)(G)	Procedures for customer notification before, during, and after de-energization	6.8 Pages 45-47 ; 7.4 Pages 52-53	Public Safety Power Shutoff, Communications Prior to Public Safety Power Shutoffs
(b)(2)(H)	Vegetation management activities and protocols	6.4 Pages 39-42	Vegetation Management

¹ TID's 2026-2029 WMP contains all of the PUC 8387 required elements.

PUC 8387 Subsection¹	PUC 8387 Required Element Description	WMP Section and Page No.	Section Title	
(b)(2)(I)	Inspections and maintenance of electrical infrastructure	6.5 Pages 43–44	Inspections	
(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.	4.2–4.5 Pages 22–29	Wildfire Drivers	Risk
(b)(2)(J)(i)	Risks and risk drivers associated with the design, construction, operation, and maintenance of the electric utility's equipment and facilities.	4.2 Pages 22–23	Wildfire Drivers	Risk
(b)(2)(J)(ii)	Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electric utility's service territory.	4.2–4.5 Pages 23–27	Wildfire Drivers	Risk
(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	5.2 Pages 30–31 ; 6.1 Page 34	Locations of Fire Zones, High Fire Threat District	
(b)(2)(L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk	4.1 Page 22	Enterprise Management	Risk
(b)(2)(M)	Procedures for restoration of service after de-energization or wildfire-related outages	8.0 Pages 54–55	Restoration of Service	
(b)(2)(N)	Monitoring and auditing of plan implementation	9.3, 9.4, and 9.5 Pages 62–63	Identifying and Correcting Deficiencies in the Plan, Monitoring Effectiveness of Inspections	

4 Wildfire Mitigation Strategy Review and Understanding

According to PUC Section 8387(c), the role of the Independent Evaluator is to “review and assess the comprehensiveness of [the utility’s] wildfire mitigation plan.” Dudek interprets this requirement to include assessing whether the utility:

- A. Understands the wildfire risks present in its service territory.
- B. Understands the specific wildfire risks associated with its equipment and operations.
- C. Implements effective mitigation strategies to address these risks.

4.1 TID’s Understanding of Wildfire Risk in Its Service Territory

TID’s 2026–2028 WMP does not divide wildfire risk and risk drivers into the two categories described in PUC Section 8387(b)(2)(J). Instead, Chapter 4 of the WMP describes the key wildfire risk drivers in TID’s service territory based on their contribution to ignition risk and fire-spread risk. These drivers include equipment failure and contact with wires, as well as environmental factors such as terrain and combustible vegetation cover. In addition to the fire-risk drivers described in Chapter 4, Sections 3.4 and 5.1 describe the two fire zones in TID’s service territory. As outlined in Section 2.1 of this report, wildfire risk is elevated in two areas: the Sierra Nevada foothills east of Turlock Lake and the Coast Range west of Interstate 5. In contrast, the remainder of the service territory has relatively low wildfire risk because the land surrounding TID equipment and lines is primarily agricultural or urban and lacks sufficient combustible vegetation to sustain a wildfire.

To evaluate TID’s understanding of wildfire risk in its service territory, Dudek reviewed utility-caused fire and outage data from 2021–2025. Utility-caused fire data serve as an indicator of the potential for an ignition event to develop into a wildfire, while outage data provide an indicator of the frequency of events with ignition potential. Dudek did not cross-reference outage data with weather data to determine whether an outage occurred during conditions conducive to wildfire spread. To evaluate risk drivers associated with fire spread, Dudek reviewed fire history within TID’s service territory.

According to TID’s WMP metrics (Section 9.2), TID’s equipment and lines have not been identified as the cause of any recorded wildfire during the past five years. TID’s outage data show 16 instances of pole or equipment fires, two-thirds of which occurred during the region’s typical fire season; one occurred within a fire zone. Additionally, TID’s service territory contains PG&E infrastructure, including transmission lines and a substation. According to CPUC records, three recorded fires in or near TID’s service territory were attributed to PG&E equipment (CPUC 2026).

4.1.1 Equipment-Based Fire Risk Drivers

TID's WMP identifies the following equipment-based risk drivers: equipment failure, wire-to-wire contact, and wire-down events. Based on outage data from TID, vehicle or third-party incidents are the most common cause of outages, accounting for about 30% of recorded outages. Equipment failure is the second most common cause of outages, accounting for 20% of outages in TID's service territory. Wire-to-wire contact is not listed as a cause of any outages in the records, but this cause would be difficult to determine unless directly observed by TID staff. Wires down is a relatively uncommon cause of outages in TID's service territory, accounting for less than 5% of outages. It is worth noting that less than 1% of recorded outages, regardless of cause or initiating event, were attributed to lines and equipment within a state-designated FHSZ or HFTD.

TID's equipment-based fire risk drivers are appropriate for understanding the utility's wildfire risk. Vehicle/third-party and equipment failure are appropriate indicators of higher-frequency outage causes in TID's service territory and are useful for understanding the frequency of events with ignition when filtered for time of year (during fire season) and location (outside of urban and agricultural areas). Vehicle/third-party-caused outages are a particularly valuable fire risk driver to understand because they represent the majority of outages in a FHSZ or HFTD and have the potential to knock energized equipment to the ground. Wire-to-wire contact and wires down are appropriate indicators of lower-frequency outage events that have a higher potential for igniting a wildfire. These fire risk drivers are useful for informing TID about the potential for higher-severity events in its service territory and, when filtered for location and weather, are good indicators of where there is a higher potential for a high-severity event.

4.1.2 Environment-Based Fire Risk Drivers

TID's WMP identifies only one environment-based fire ignition driver: vegetation contact with wires. Based on TID's outage data, less than 10% of recorded outages are attributed to contact with vegetation. This is not surprising, considering that tree cover within TID's service territory is limited to small, isolated areas and that most vegetation is either agricultural or grassland. Adverse weather, which includes high winds, is not listed as a wildfire ignition risk driver but accounts for a similar percentage of outages in TID's service territory. Only one recorded outage attributable to vegetation or adverse weather was located within an FHSZ or HFTD.

TID's WMP identifies environment-based fire-risk drivers as important factors in fire spread. The WMP summarizes terrain, weather, and vegetation conditions within the service territory that are more conducive to fire spread, such as those in FHSZs and HFTDs. These risk drivers are not unique to areas surrounding TID's equipment and lines; rather, they occur throughout portions of TID's service territory within FHSZs and HFTDs. TID's WMP states that mountainous areas covered by chaparral and woodlands have the greatest potential for high-intensity wildfire within the service territory. CAL FIRE fire-history data confirm this: historical fires are more frequent and larger on the western side of the service territory in the Coast Range, where mountainous terrain and chaparral predominate, than on the eastern side, which extends into the grass-covered Sierra Nevada foothills. Table 3 of the WMP identifies the circuit miles of overhead distribution and transmission lines within FHSZs or HFTDs and further divides those miles between the East Side and West Side Fire Zones. Although the distribution of overhead lines is similar in the two fire zones, the fire-spread risk drivers described in the WMP suggest that TID's equipment and lines in the West Side Fire Zone have a higher fire risk; however, the WMP does not state this explicitly.

TID's environment-based fire-risk drivers are appropriate for understanding the conditions that govern wildfire spread within its service territory. Because the East Side and West Side Fire Zones are relatively sparsely developed

and contain continuous combustible vegetation, it is appropriate to use general terrain features, such as the Coast Range, or vegetation types, such as chaparral, to define areas of higher wildfire risk. However, the analysis could provide greater detail. Based on Table 3 of the WMP, a relatively small portion of TID’s equipment and lines is located within an FHSZ or HFTD. In both fire zones, the equipment and lines occupy relatively limited areas, creating an opportunity to refine the analysis to conditions immediately surrounding the equipment and lines rather than treating each entire fire zone uniformly. Terrain and vegetation likely vary within each zone, resulting in corresponding variation in fire risk.

4.2 TID Wildfire Risk Mitigation Strategies

As identified in Sections 4.2–4.5 of the WMP, the potential for TID equipment to ignite a wildfire—and for that wildfire to spread from the point of ignition within TID’s fire zones—is driven by a combination of equipment-based factors that affect ignition risk and environmental conditions that affect fire-spread risk.

TID deploys several wildfire mitigation strategies intended to reduce the risk of its equipment starting a wildfire, including situational awareness tools, design and construction standards, vegetation management, inspection programs, workforce training, reclosing policy for the substations that feed into the two fire zones, and public safety power shutoff. Regarding design and construction standards, TID has a separate standard, the Fire Zone Standard, that describes where the standard applies, allowable equipment in the fire zones, and vegetation clearance requirements, including surface vegetation management standards.

The wildfire mitigation strategies listed in TID’s WMP are consistent with practices implemented by other POUs in California and the Western U.S. (Coleman et al. 2025). Table 2 lists the wildfire risk drivers in TID’s service territory and the mitigation strategies that impact its overall risk.

Table 2. TID Wildfire Risk Driver to Risk Mitigation Strategy Comparison

Wildfire Mitigation Strategy	Wildfire Risk Driver	Relationship to Ignition Event/Outage Data	Comment
Weather Monitoring	Vegetation contact with wires, wire-to-wire contact, Vegetation density, Vegetation type, high winds	56% of alert levels and operating state changes due to Red Flag Warning, 10% due to wildfire	Deployed two weather stations in the west fire zone

Wildfire Mitigation Strategy	Wildfire Risk Driver	Relationship to Ignition Event/Outage Data	Comment
Vegetation Management (Line Clearance)	Vegetation contact with wires, Vegetation density, Vegetation type, high winds	Vegetation contact with wires accounts for 8% of TID-recorded outages.	TID completes vegetation inspections on all T&D lines annually.
Vegetation Management (Pole Clearance and Fuel Reduction)	Wire down events, Vegetation density, Vegetation type	Pole clearance and fuel reduction don't eliminate fire risk but reduce the likelihood of rapid fire growth at ignition point. Limits fire intensity and duration near poles	TID Fire Zone Standard defines treatment requirements.
Inspections	Wire-to-wire contacts, wire-down events, electrical equipment failure, vegetation contact with wires	Equipment failure accounts for 20% of TID recorded outages. Wires down account for 1% of TID recorded outages.	TID completes asset inspections on all T&D lines annually.
Design and Construction Standards	Wire-to-wire contacts, wire-down events, electrical equipment failure, high winds	Equipment failure accounts for 20% of TID recorded outages.	Wood poles with internal decay are being replaced with fiberglass poles. TID developed more sensitive protection settings for reclosers in fire zones.
PSPS	Wire-to-wire contacts, wire-down events, electrical equipment failure, vegetation contact with wires, vegetation density, vegetation type	TID has not de-energized lines. PG&E has de-energized lines twice since 2020, impacting a small number of customers on the west side of the service territory.	Based on weather observations, fire danger, and SME assessment of local conditions

Wildfire Mitigation Strategy	Wildfire Risk Driver	Relationship to Ignition Event/Outage Data	Comment
Reclosing Policy	Wire-to-wire contacts, wire-down events, electrical equipment failure, vegetation contact with wires	Reclosing policy activated 4 times in 2025 due to Red Flag Warning conditions.	TID reclosers in fire zones are disabled during Red Flag Warnings.

4.3 TID Public Safety Power Shutoff

TID, like many POU's, views Public Safety Power Shutoffs as a last resort. However, TID has continued to develop its PSPS program since publishing its first WMP in 2020, when the thresholds for determining when to use a PSPS were limited and the program was implemented only at the request of emergency services during an active incident. The current PSPS program described in the 2026-2028 WMP is more robust and includes monitoring fire danger, nearby fire incidents, and observed and forecast weather conditions, as well as consulting subject matter experts (SMEs). TID has also integrated its PSPS processes into its wildfire mitigation strategy framework so that use of a PSPS is assessed as part of a broader wildfire risk-reduction strategy that includes disabling reclosers and increasing system sensitivity. The WMP describes TID's PSPS implementation sequence, including staff responsibilities, the implementation timeline, and restoration procedures when a PSPS is no longer necessary.

The Wildfire Safety Advisory Board's December 2025 guidance provided specific recommendations that TID add more detail to its WMP regarding the potential use of a PSPS, including the following (OEIS 2025):

1. Describe the data and data sources used to make the decision.
2. Describe the procedures used to collect data and verify that the data are accurate and current.
3. Identify the parties responsible for making the decision and the criteria used.
4. Describe the actions necessary to implement a de-energization and the parties responsible for executing them.
5. Define the "extreme fire event" under which TID would make a real-time decision about whether to de-energize.

Section 6.8 of TID's 2026-2028 WMP addresses WSAB Recommendations 1-4. Recommendation 5 is not described in the WMP; TID is currently developing weather and fire-danger thresholds for implementing a PSPS.

5 Wildfire Mitigation Strategy Execution

5.1 WMP Tracked Event Metrics

Section 9.2 provides records for 12 tracked metrics: 4 event-based metrics, 2 performance-based metrics, and 5 outcome-based metrics. The twelfth metric consists of TID's SAIDI and SAIFI scores, which, as measures of overall reliability, represent both performance- and outcome-based metrics. The WMP metric data generally indicate successful implementation of TID's wildfire mitigation strategies. Negative outcome events, such as TID-attributed wildfire ignitions, indicate that the utility's electrical system has not caused a wildfire ignition during the past five years. Outage data indicate that outages—particularly those attributed to causes more likely to start a fire, such as downed wires, or those occurring in areas where substantial fire growth is possible—are not increasing. At the same time, positive performance metrics, including distribution and transmission inspections, show that 100% of TID's equipment and lines were inspected.

5.2 Vegetation Inspection and Management

TID met all of its vegetation management activity targets in 2025. It began inspections around transmission assets in April and prioritized communities within HFTDs. TID completed line-clearance trimming for all identified trees and cleared vegetation around the base of all poles identified for pole-base clearance.

5.3 Situational Awareness Upgrades

In 2025, TID installed two new weather stations in the fire zone west of Interstate 5. TID also began a partnership with the Wildfire Forecast & Threat Intelligence Integration Center (WFTIIC) to receive weather observations, fire-danger observations, and forecasts for the region that includes TID's service territory.

6 Conclusion

Within TID's service territory and portions of the surrounding area, wildfire risk is elevated because of terrain and vegetation that can support rapid fire growth, combined with a prolonged dry period during summer and fall when extreme fire-weather events occur. Within TID's designated fire zones, portions of TID's overhead circuits and facilities are near continuous unmanaged vegetation and could ignite a wildfire if an ignition event—such as vegetation contacting an energized line or equipment failure—occurred. Although TID equipment has not been identified as the cause of any recent wildfires, its service territory and surrounding areas in the Coast Range and Sierra Nevada have experienced several recent destructive wildfires, including the 2006 Canyon Fire.

TID's 2026–2028 Wildfire Mitigation Plan is a comprehensive document that addresses each element required by PUC Section 8387(b)(2). This review assessed whether the plan satisfies applicable PUC requirements, reflects an appropriate understanding of wildfire risk and risk drivers in TID's service territory, and identifies mitigation strategies responsive to those risks. TID's WMP demonstrates an understanding of wildfire risk through its partnership with WFTIIC, its use of weather and fire-danger monitoring for real-time analysis during fire season, and a proactive annual inspection program that includes two cycles of equipment and line inspections each year. The WMP also describes how TID modifies system settings to minimize ignition risk in areas it has identified as having high wildfire risk. Although TID considers PSPS a last-resort measure, the program is integrated into its situational-awareness and wildfire mitigation framework. Accordingly, PSPS is evaluated as fire danger increases and TID consults with SMEs and utility leadership, rather than being treated as a stand-alone strategy. TID's mitigation strategies are responsive to the specific risks in its service territory. For example, its robust equipment inspection and maintenance program addresses several of the most frequent causes of outages and, therefore, sources of ignition potential. The WMP also demonstrates TID's investment in long-term wildfire risk reduction, including an equipment-hardening program intended to reduce the likelihood of ignition in high-fire-hazard areas and a pole-wrap program intended to improve pole and line survivability during a wildfire.

The Wildfire Safety Advisory Board (WSAB) released guidance to POUs in December 2025 regarding the contents of each POU's WMP. TID received specific guidance from the WSAB to include a more detailed description of its PSPS processes, including the data and data sources used to make PSPS decisions. TID's 2026–2028 WMP addresses this request, and TID is working with Dudek to develop more detailed weather and fire-danger thresholds for incorporation into its PSPS decision-making process.

In summary, TID's 2026–2028 Wildfire Mitigation Plan addresses each required element of Public Utilities Code Section 8387. It demonstrates a proactive, risk-informed approach to wildfire prevention, operational readiness, and system resiliency. The plan reflects TID's commitment to continuous improvement through enhanced situational awareness, targeted vegetation management, system-hardening investments, and clearly defined operational protocols intended to reduce the likelihood and consequences of utility-related ignitions. By incorporating WSAB guidance, strengthening its PSPS framework, and aligning mitigation strategies with the specific wildfire risks present within its service territory, TID has developed a WMP that supports regulatory compliance and the ongoing protection of public safety, utility infrastructure, and the communities it serves.

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Figure 1. Turlock Irrigation District Service Territory

Figure 2. West Side Fire Zone

Figure 3. East Side Fire Zone

Figure 4A. Fire History

Figure 4B. Fire History—West Side

Figure 4C. Fire History—East Side

Figure 5. Fire Hazard Severity Zones

Figure 6. High Fire-Threat Districts



BOARD AGENDA REPORT

Board Meeting Date:	September 22, 2026
Subject:	TID 2026 Wildfire Mitigation Plan Update
Administration:	Electrical Engineering and Operations
Recommended Action:	Consider a resolution adopting the Turlock Irrigation District 2026 Wildfire Mitigation Plan.
Background and Discussion:	In accordance with Public Utilities Code (PUC) § 8387, TID maintains a Wildfire Mitigation Plan (WMP) to reduce utility wildfire risk. The Board adopted the original plan in 2019 and the 2025 annual update on June 17, 2025. The 2026 update documents performed 2025 and 2026 work, including two weather stations west of Interstate 5 with wind, temperature, and humidity data integrated into Power Control Center monitoring. TID also accelerated intrusive wood-pole testing, continued replacing internally decayed poles with fiberglass poles, and shifted fire-zone intrusive inspections from a 10-year to a 5-year cycle as well as added four additional East Side reclosers. The update adds the Hughson AiDash vegetation-management pilot using satellite imagery, artificial intelligence, LiDAR, weather, and system data to identify vegetation risks. The pilot produced 100% confirmed results and broader work-management integration will be evaluated. The plan also documents more sensitive Group 2 recloser settings for Red Flag Warnings, automation targeted for 2027, covered-conductor evaluation and weather-data integration.
Alternative(s) Pros and Cons:	Alternative: Not adopt the Wildfire Mitigation Plan Update. Pros: None Cons: The District would be in non-compliance.
Additional Information:	N/A
Fiscal Impact:	N/A

Presenter Signature	Dept. Manager Signature	AGM Signature
<i>Manjot Gill</i>		<i>Manjot Gill</i>
Name: Manjot Gill	Name:	Name: Manjot Gill
Date Signed: 09/11/2026	Date Signed:	Date Signed: 09/11/2026

GM Signature

Name: Brad Koehn
Date Signed: 09/16/2026