
 <b>Valley Electric Association, Inc.</b> A Touchstone Energy® Cooperative 	<b>Operations Plan</b>	Version No.	1.0
		Effective Date	January 1, 2026
		Plan Owner	Aaron Lynn
<b>WILDFIRE MITIGATION PLAN (WMP)</b>		<b>DISTRIBUTION RESTRICTION: NONE</b>	

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

**1. INTRODUCTION & STATUTORY AUTHORITY**

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

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

**2. ORGANIZATIONAL RESPONSIBILITIES**

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

(PUC §8387(b)(2)(A))

**3. OBJECTIVES OF THE PLAN**



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

(PUC §8387(b)(2)(B))

**4. SYSTEM RISKS & MITIGATION STRATEGIES**

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

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

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## 5. PERFORMANCE METRICS & EVALUATION

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

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

## 6. OPERATING STRATEGIES

- 6.1 Weather Monitoring
  - 6.1.1 Continuous monitoring of NWS Red Flag Warnings and local conditions.
- 6.2 Reclosing Protocols
  - 6.2.1 Automatic reclosing disabled during Red Flag Warnings in high fire-threat areas.
- 6.3 De-Energization Protocols
  - 6.3.1 Case-by-case decisions based on weather, fire behavior, risk to infrastructure, and impacts on essential services.
- 6.4 Power Restoration
  - 6.4.1 Patrols conducted prior to re-energization; System Operators coordinate safe re-energization once verified.

(PUC §8387(b)(2)(F), (M))

## 7. NOTIFICATION PROCEDURES



- 7.1 Planned Outages
  - 7.1.1 Advanced notice to customers via text/robocalls, postings on VEA's website.
- 7.2 Unplanned Outages
  - 7.2.1 Outage map updated in real time; updates via text messages.
- 7.3 Public Safety Notifications
  - 7.3.1 Critical facilities, telecoms, and first responders notified per Appendix C.

(PUC §8387(b)(2)(G))

## 8. COORDINATION WITH FIRE AGENCIES

- 8.1 VEA incorporates BLM/NREA MOU protocols, including:
  - 8.1.1 Initial attack communication with BLM Duty Officer.
  - 8.1.2 Extended attack coordination and Incident Command Post check-ins.
  - 8.1.3 Fire investigation protocols, evidence handling, and custodian agreements.
  - 8.1.4 Notification protocols for BLM critical infrastructure

(PUC §8387(b)(2)(F), (N))

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## 9. VEGETATION MANAGEMENT

- 9.1 Annual trimming cycles based on species, growth rates, and fire-threat level.
- 9.2 Clearance distances in line with or exceeding CPUC and RUS standards.
- 9.3 Contractor oversight, performance auditing, and corrective action tracking.

(PUC §8387(b)(2)(H))

## 10. INSPECTION & CONTRACTOR OVERSIGHT

- 10.1 Inspection cycles
  - 10.1.1 Annual patrols; detailed inspections every 1–5 years.
- 10.2 Technology
  - 10.2.1 Drones, infrared imaging where appropriate.
- 10.3 Auditing
  - 10.3.1 Contractor-performed inspections subject to QA reviews.

(PUC §8387(b)(2)(I), (N)(iii))

## 11. PUBLIC ENGAGEMENT

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

(PUC §8387(b)(3))

## 12. INDEPENDENT EVALUATION



- 12.1 Annual review by a qualified independent evaluator.
- 12.2 Report published on VEA’s website and presented at a public board meeting.

(PUC §8387(c))

## 13. ANNUAL REVIEW & REVISION

- 13.1 Annual update submitted to the California Wildfire Safety Advisory Board by July 1.
- 13.2 At least once every three years, a comprehensive revision will be filed.

(PUC §8387(b)(1))

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### *APPENDICES*

- **Appendix A: Prioritized Wildfire Risk List**
  
- **Appendix B: High Fire-Threat District Maps (including any proposed expansions).**
  
- **Appendix C: BLM/NREA MOU (Points of Contact, Notification Protocols).**
  
- **Appendix D: Vegetation Management Program (Clearance Standards and Schedules).**
  
- **Appendix E: Inspection Program (Schedules, Contractor oversight).**
  
- **Appendix F: Fire Investigation Procedures (Evidence handling, interview protocols).**
  
- **Appendix G: Independent Evaluator Report (upon completion).**

Valley Electric Association, Inc.  
With approval from the Board of Directors

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Name: Aaron Lynn  
Title: Director of Line Operations, Valley Electric Association, Inc.  
Date:

## APPENDIX A: PRIORITIZED WILDFIRE RISK LIST

### 1. PURPOSE

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

### 2. RISK CATEGORIES

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

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

### 3. RISK SCORING METHODOLOGY

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

- 3.1 Likelihood Factors (1–5 scale)
  - 3.1.1 Equipment age/condition
  - 3.1.2 Vegetation density/encroachment
  - 3.1.3 Wind/temperature/humidity exposure
  - 3.1.4 Historical ignition history
- 3.2 Consequence Factors (1–5 scale)
  - 3.2.1 Population density near circuit
  - 3.2.2 Proximity to critical infrastructure
  - 3.2.3 Fire spread potential (slope, fuels, canyon effect)
  - 3.2.4 Suppression difficulty (access, distance from resources)

#### Risk Score Formula:

- 3.3 Risk Score = (Likelihood Average) × (Consequence Average)
  - 3.3.1 Scores range from 1 (Very Low) to 25 (Very High).
  - 3.3.2 Circuits/assets scoring 16 or higher are considered Priority 1 for mitigation actions.

## APPENDIX A: PRIORITIZED WILDFIRE RISK LIST

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

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

### 5. *APPLICATION OF METHODOLOGY*

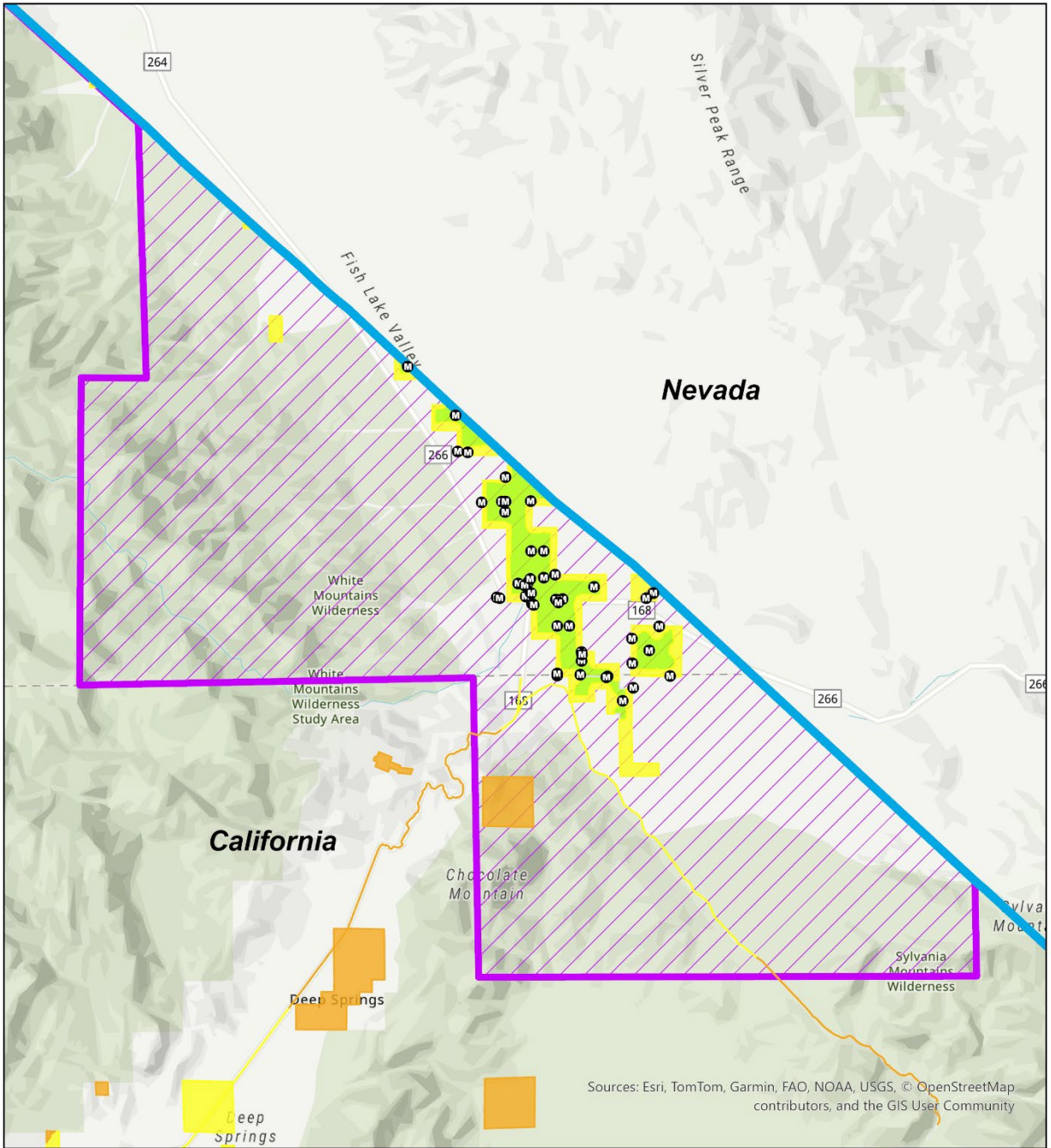
- 5.1 Risk scoring is performed annually by VEA Engineering & Operations.
- 5.2 Scores used to prioritize vegetation cycles, equipment replacements, and underground projects.
- 5.3 High-priority circuits included in capital planning and O&M budgeting.
- 5.4 Scores updated with new climate/weather data,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

### 6. *INTEGRATION WITH ENTERPRISE SAFETY*

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

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

**APPENDIX B: HIGH FIRE-THREAT DISTRICT MAPS**



**Legend**

- VEA Customers in California (48 Total)
- VEA Service Area In California
- State Boundary

**Fire Hazard Severity Zones (FHSZ)**

- Very High
- High
- Moderate
- Non Wildland



## APPENDIX C: BLM/NREA MOU (POINTS OF CONTACT, NOTIFICATION PROTOCOLS).

### 1. PURPOSE

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

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

### 2. ROLES AND RESPONSIBILITIES

#### 2.1 VEA Responsibilities

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

#### 2.2 BLM Responsibilities

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

### 3. NOTIFICATION PROTOCOL

#### 3.1 Threatened Powerline Notification

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

#### 3.2 Outage Notification for Critical Infrastructure

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

## APPENDIX C: BLM/NREA MOU (POINTS OF CONTACT, NOTIFICATION PROTOCOLS).

### 3.3 Initial Attack (IA) & Extended Attack Coordination

#### 3.3.1 Initial Attack:

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

3.3.1.2 Duty Officer-to-Duty Officer communication established.

#### 3.3.2 Extended Attack:

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

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

3.3.2.3 Liaison remains available to Operations Section Chief or IC.

### 3.4 Participation in Incident Planning

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

3.4.1.1 Provide infrastructure updates.

3.4.1.2 Coordinate with Operations Section.

3.4.1.3 Share situational awareness with utility assets.

## 4. RADIO FREQUENCY ASSIGNMENTS & COMMUNICATION PROTOCOLS

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

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

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

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

## 5. FIRE INVESTIGATION COORDINATION

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

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

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

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

5.5 VEA provides operational/maintenance records when requested.

## 6. MONITORING & AUDITING

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

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

6.3 Corrective actions incorporated into the next WMP update.

## 7. CRITICAL INFRASTRUCTURE COORDINATION AND DATA RETENTION

### 7.1 Overview

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

### 7.2 Data Retention & Security

7.2.1 For security and sensitivity reasons, these specific coordinates and contact details are retained internally within VEA's Emergency Management and Operations divisions and are not published in the publicly filed Wildfire Mitigation Plan. All notifications and coordination activities are

## APPENDIX C: BLM/NREA MOU (POINTS OF CONTACT, NOTIFICATION PROTOCOLS).

conducted through established MOU channels and verified via periodic joint exercises with BLM and county fire agencies.

### **7.3** Agency Points of Contact (Summary)

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

## APPENDIX D: VEGETATION MANAGEMENT PROG. (CLEARANCE STANDARDS & SCHEDULES)

### **1. PROGRAM OBJECTIVES:**

- 1.1** Geographic Maintain required vegetation clearances around all distribution and transmission facilities.
- 1.2** Exceed minimum industry standards (CPUC GO 95, RUS Bulletin 1730B-121).

### **2. CLEARANCE STANDARDS:**

- 2.1** Distribution ( $\leq 34.5$  kV): 10-foot Clearance To Wire
- 2.2** Transmission (69 kV – 230 kV): 16-foot Clearance To Wire
- 2.3** High Fire-Threat Areas: Enhanced clearances based on local conditions and fire risk scoring.

### **3. CYCLE FREQUENCY:**

- 3.1** Distribution: Every 3 years (annual patrols in Tier 2/3 zones).
- 3.2** Transmission: Every 5 years (aerial patrols annually).
- 3.3** High Fire-Threat Zones: Additional mid-cycle inspections as needed.

### **4. CONTRACTOR OVERSIGHT:**

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

## APPENDIX E: INSPECTION PROGRAM (SCHEDULES, CONTRACTOR OVERSIGHT).

### **1. INSPECTION OBJECTIVES:**

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

### **2. INSPECTION CYCLES:**

- 2.1** Distribution Poles: Detailed inspection every 5 years; patrol annually.
- 2.2** Transmission Poles: Detailed inspection every 3 years; patrol annually.
- 2.3** Substations: Monthly inspections; annual detailed inspection.
- 2.4** High Fire-Threat Areas: Accelerated cycle (distribution poles every 3 years, patrols twice per year).

### **3. INSPECTION METHODS:**

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

### **4. CONTRACTOR AUDITING:**

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

***FIRE INVESTIGATION QUESTIONS***

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

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

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

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

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

## APPENDIX G – INDEPENDENT EVALUATOR SELECTION & REPORTING TIMELINE

### **1. EVALUATOR SELECTION:**

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

### **2. EVALUATION PROCESS:**

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

### **3. REPORTING TIMELINE:**

- 3.1** Evaluator's Report due: Within 90 days of WMP filing each year.
- 3.2** Publication: Report will be posted on VEA's website.
- 3.3** Presentation: Report will be presented at a noticed VEA Board of Directors meeting within 120 days of filing.
- 3.4** Retention: Reports archived for public access for at least 5 years.

BOARD RESOLUTION NO. 2026-XX

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

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

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

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

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

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

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

VALLEY ELECTRIC ASSOCIATION, INC.

By \_\_\_\_\_  
Michelle Caird, President

CERTIFICATE

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

THAT the above resolutions are a true and correct copy of the resolution adopted by the board of directors of Valley Electric Association, Inc. at its meeting held on the 8th day of January 2026, in Pahrump, Nevada, and that said resolution has not been rescinded or modified.

IN WITNESS WHEREOF, I have set my hand this 8<sup>th</sup> day of January 2026.

\_\_\_\_\_  
Frank Jarvis, Secretary