

 Central Power Electric Cooperative, Inc. Your Touchstone Energy® Cooperative 	WILDFIRE MITIGATION PLAN	Revision 1.00
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Wildfire Mitigation Plan

Version: 1.00
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Central Power's Wildfire Mitigation Plan (Revision 1.00) is adapted from Minnkota Power Cooperative's Wildfire Mitigation Plan (Version 1.00), with Minnkota's permission. Central Power has reviewed and, where appropriate, modified the source material to reflect its own system characteristics and operational practices. Additional sources are cited in footnotes throughout this document.

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1. Introduction

Central Power Electric Cooperative, Inc. (Central Power) is committed to providing safe, reliable, and economical electric power to our member cooperatives while mitigating the risk of wildfire ignition and spread. In recognizing risk factors, following existing procedures, and implementing new practices, we aim to continue to provide excellent service while mitigating wildfire risk.

1.1 Purpose of Wildfire Mitigation Plan

The purpose of the Wildfire Mitigation Plan (WMP) is to identify risk factors present in the Central Power service territory including topography, weather, drought, and areas with a higher historical risk of wildfires. The WMP also collects and reiterates the processes and procedures Central Power is already following to reduce fire risk while expanding procedures to include new technologies and changes in industry practices.

1.2 Objective of Plan

The objective of the WMP is to identify areas of direct and indirect risk and document our practices in reducing those risks. The overall goal of the WMP is to:

- Increase safety for our operations team, members, and surrounding communities
- Continue service reliability
- Limit liability
- Streamline community outreach
- Set a standard upon which to continually improve

1.3 Central Power History

Central Power is a not-for-profit wholesale power supply and transmission cooperative headquartered in Minot, North Dakota. Central Power was organized in 1949 to build, own, and operate the William J. Neal power plant to supply electrical power for its member rural electric distribution cooperatives. Central Power was later reorganized to supply the bulk power needs of its members through a backbone system of transmission and substation facilities. Today, Central Power operates and maintains transmission infrastructure including 179 delivery substations, 29 wholly owned and 7 jointly owned high-voltage transmission stations, and 1,532 miles of transmission line which span the central and southeastern third of North Dakota. Central Power's facilities are interconnected with Western Area Power Administration, Basin Electric Power Cooperative, and three investor-owned utilities.

1.4 Service Territory

Central Power's member cooperatives combine to serve 69,900 farms, homes, and businesses in a service area of 25 counties across the central and southeastern third of North Dakota (Figure 1).

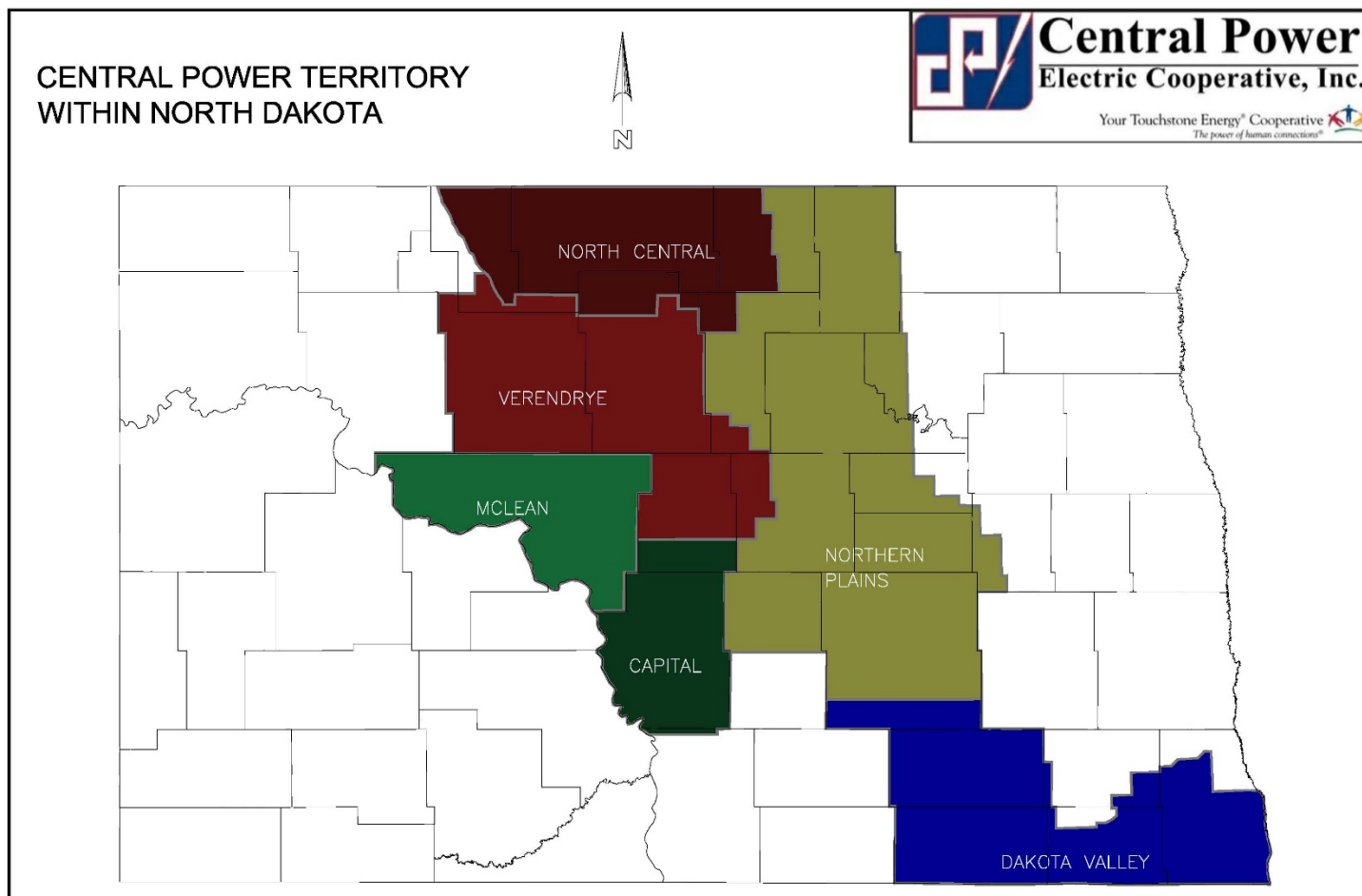


Figure 1: Central Power Service Territory

2. Risk Analysis and Risk Drivers

To create processes and procedures to decrease the risk of wildfire, Central Power first examined internal and external factors that have the potential to cause wildfire. After reviewing the service territory, land uses, weather conditions, topography, operational practices, and infrastructure, Central Power identified the following risk factors:

- Drought and historical fire risk
- Right-of-way clearance and vegetation types
- Routine maintenance activities
- Routine construction activities
- Accessibility limitations
- Conductor contacts
- Land usage
- Equipment failure

2.1 Drought and Historical Fire Risk

Central Power's service territory is fully included within the Commission for Environmental Cooperation (CEC) Level 1 Terrestrial Ecoregion denoted as the Great Plains region. This region experiences an average rainfall of between 15" and 24" according to the CEC Annual precipitation level maps.

Factors considered when identifying risk within the Central Power service territory include the Wildland Urban Interface (WUI) map (Figure 2) and Wildfire Hazard Potential (WHP) map (Figure 3). Central Power's transmission lines are overlaid on these maps.

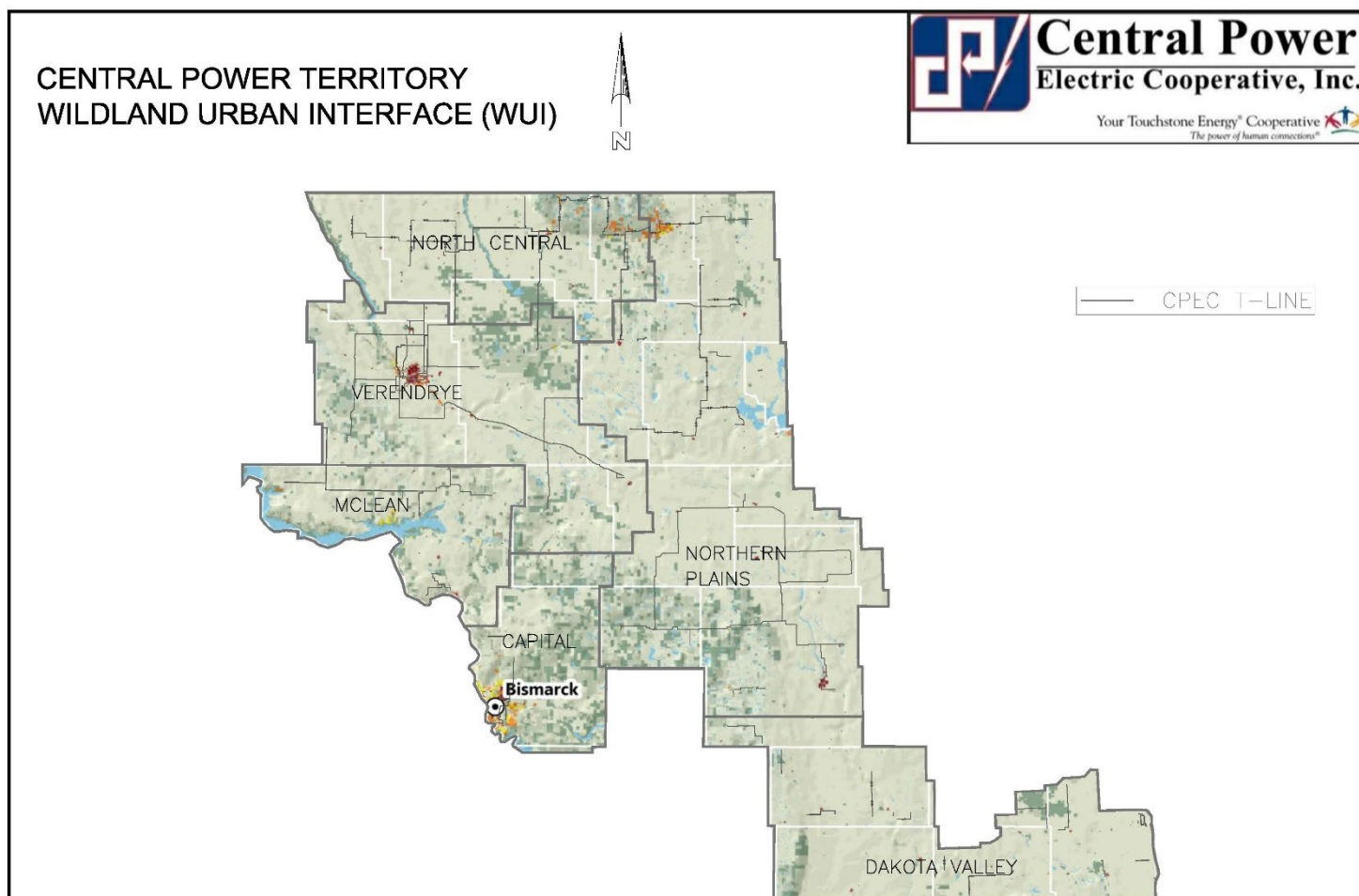


Figure 2: Wildland Urban Interface map as it relates to Central Power territory
"Wildland-Urban Interface (WUI) Change 1990-2020" Accessed
March 4, 2026 (<https://silvis.forest.wisc.edu/data/wui-change/>)

The Western Fire Chiefs Association (WFCA) explains the WUI as: "Wildland Urban Interface (WUI) is the area where land that has been developed by humans, meets land that is unoccupied and undeveloped.² It exists in all regions of the United States, in any place where humans live among or

adjacent to vegetation.³ Expanding human development into areas of WUI has led to a rise in the risk of wildland fires, which can be challenging and complicated to fight.⁴ Currently there are over 60,000 communities at risk of fires in areas of WUI, and every year the amount of WUI area grows by an estimated 2,000,000 acres.^{2 “ 1}

The WFCA also describes how fire spreads in WUI areas as: “Fires spread through WUI areas by means of radiant exposure, ember exposure, and direct flame contact. Radiant exposure can happen when flames from wildland fires are next to exposed structures, and thermal radiation increases. Direct flame contact takes place when flames from vegetation fires or other sources come into contact with adjacent structures. Ember exposures, which are the primary cause of structural loss from WUI fires, can happen in different ways. Embers can ignite structures directly, they can smolder and later transition to flames, they can enter structures through openings and ignite materials within, they may ignite vegetation, and they can cause fire to spread long after the “fire front” has moved on.⁵ In areas of higher housing density, a fire that has moved from wildland to a structure can then spread rapidly between buildings, creating a “domino effect.”^{6 “ 1}

Sources

1. Western Fire Chiefs Association (WFCA), “What is WUI (Wildland Urban Interface) and How Does It Work?” Accessed March 4, 2026 (<https://wfca.com/wildfire-articles/what-is-wui-wildland-urban-interface/>)
2. U.S. Fire Administrations, “What is the WUI?” – Accessed March 11, 2025 (by WFCA)
3. National Park Service, “Wildland Urban Interface (WUI).” Accessed March 12, 2025 (by WFCA)
4. Natural Hazards, “Compounding effects of climate change and WUI expansion quadruple the likelihood of extreme impact wildfires in California.” Accessed March 14, 2025 (by WFCA)
5. National Institute of Standards and Technology, “How Fire Spreads in the WUI.” Accessed March 12, 2025 (by WFCA)
6. Insurance Institute for Business & Home Safety, “Wind-Driven Building-to-Building Fire Spread.” Accessed March 12, 2025 (by WFCA)

The Wildland Urban Interface map (Figure 2) shows areas of higher concern within Central Power’s territory to be the Turtle Mountain, Bismarck, Jamestown, and Minot areas.



**CENTRAL POWER TERRITORY
WILDFIRE HAZARD POTENTIAL (WHP)**

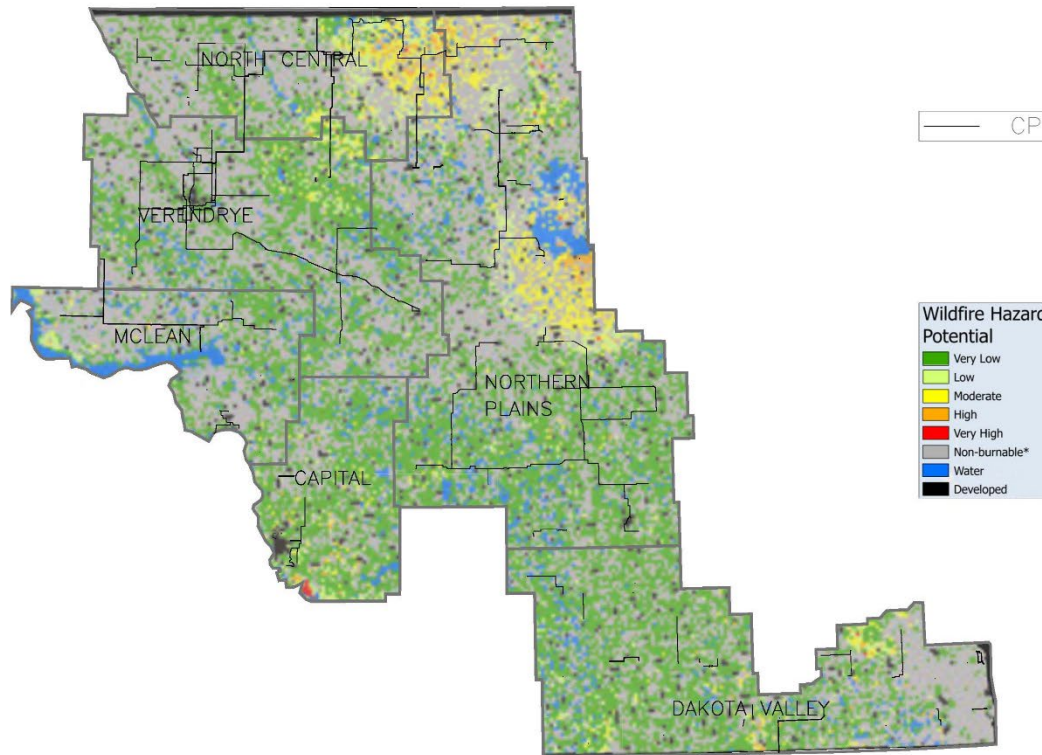


Figure 3: Wildfire Hazard Potential as it relates to Central Power territory
“Wildfire Hazard Potential map, Version 2023” Accessed March 4, 2026
(<https://research.fs.usda.gov/firelab/understory/whp2023-classified-map>)

“The Wildfire Hazard Potential (WHP) map is a raster geospatial product produced by the USDA Forest Service, Fire Modeling Institute that can help to inform evaluations of wildfire hazard or prioritization of fuels management needs across very large landscapes. Our specific objective with the WHP map is to depict the relative potential for high-intensity wildfire that may be difficult to manage.”¹

“Areas mapped with higher WHP values represent fuels with a higher probability of experiencing torching, crowning, and other forms of extreme fire behavior under conducive weather conditions, based primarily on landscape conditions at the end of 2020.”¹

“On its own, WHP is not an explicit map of wildfire threat or risk. Its primary purpose is to highlight places where vegetation treatments may be needed to reduce the intensity of future wildfires. It is one of several factors used to prioritize limited fuel treatment resources. WHP is a tool for long-term

strategic planning, but it is not a forecast or wildfire outlook for any particular season, as it does not include any information on current or forecasted weather or fuel moisture conditions.”¹

Sources

1. U.S. Department of Agriculture (USDA), “Wildfire Hazard Potential” Accessed March 4, 2026 (<https://research.fs.usda.gov/firelab/products/dataandtools/wildfire-hazard-potential>)

The Wildfire Hazard Potential map (Figure 3) shows areas of higher concern within Central Power’s territory to be the Turtle Mountains and the area south of Devils Lake. The Turtle Mountain area is the only area within Central Power’s territory where both the WUI and WHP maps reflect heightened risk when they are overlaid. This overlapping area is the general location of Central Power’s Bottineau, Metigoshe, Kelvin, Thorne 69kV transmission line. This is further addressed in Section 3.2.2.

2.2 Accessibility Limitations

Although much of Central Power’s system is easily accessible by adjacent roadways, there are areas not easily accessible by roadways as well as areas of difficult terrain. Central Power mitigates accessibility limitations by having equipment available that can traverse difficult terrain.

2.3 Vegetation and Fuel Types

Vegetation throughout the Central Power system varies as the system transitions from prairie land in most of Central Power’s system to heavily treed areas in the Turtle Mountain area but there are risks associated with both prairie land and treed areas. Prairie land in North Dakota poses risk to fast ignition and burning, especially when paired with the extended periods of drought, mature crops each fall, and high winds that this region sees. Conversely, the heavily treed Turtle Mountain area has a significant amount of fuel that has the capacity to burn for a longer period of time. This fuel source, combined with access concerns and the WUI, increases the risk of widespread fire creating significant damage. Hazard trees are a risk to consider in treed corridors as weather and disease can increase the risk of a hazard tree falling and striking transmission lines and causing ignition.

2.4 Foreign Contact

Foreign contact with conductors and poles increases the risk of a wildfire. Foreign contacts can include but are not limited to:

- Wildlife such as birds, squirrels, and raccoons
- Vegetation
- Farming and construction equipment
- Vehicles

Central Power has installed protective relay settings intended to reduce the risk of ignition due to foreign contact. In the event foreign contact continues through the recloser sequence, there is risk of a spark causing ignition.

2.5 Equipment Failure

Equipment failure could be a result of defects in equipment or aging infrastructure. Central Power's robust inspection programs help identify equipment problems so that they can be corrected, thereby reducing equipment failure related fire risk. However, some defects may be very difficult to identify because of their location or size of the defect. Unobserved defects have the potential to cause failure and result in ignition.

2.6 Land Usage

Central Power's system resides in agricultural, residential, and recreational land. Most of Central Power's transmission system runs adjacent to road rights of way. Operations performed in these areas (i.e. harvesting and vehicle traffic) can heighten the risk of foreign contact and ignition from a third party.

3. Operational Practices

Central Power has established operational processes and procedures used to reduce the risk of fire ignition and has identified areas to expand on existing procedures related to wildfire mitigation. Some of the actions in this section are new or will be introduced in 2026 or 2027.

3.1 Situational Awareness

Central Power purchased a National Information Solutions Cooperative (NISC) iVUE Geographic Information System (GIS) system in 2025 and has been loading our transmission line information to make it a fully functional GIS system. Our efforts to fully implement the GIS system will continue into 2027.

Central Power is working with our GIS vendor to include situational awareness tools within our GIS applications that will allow personnel to evaluate fire danger risk within our service territory. These tools will help job planning, decision-making, and alterations to operational procedures when deemed necessary. Central Power will use our GIS platform, North Dakota Fire Danger Ratings map, North Dakota Red Flag Warning/Fire Weather Watch map, North Dakota Daily Burn Restrictions map, and real-time field observations to assist in work planning and identifying alterations to work practices.

- The North Dakota Fire Danger Ratings map is found at:
["https://experience.arcgis.com/experience/c5da309af17b4c48a3b953675a77f654/page/Dashboard-Page?views=Fire-Danger-Ratings"](https://experience.arcgis.com/experience/c5da309af17b4c48a3b953675a77f654/page/Dashboard-Page?views=Fire-Danger-Ratings)
- The North Dakota Red Flag Warning/Fire Weather Watch map is found at:
<https://experience.arcgis.com/experience/c5da309af17b4c48a3b953675a77f654/page/Dashboard-Page?views=Red-Flag-Warning%2FFire-Weather-Watch>
- The North Dakota Daily Burn Restrictions map is found at:
<https://experience.arcgis.com/experience/c5da309af17b4c48a3b953675a77f654/page/Dashboard-Page?views=Today%27s-Burn-Restrictions>

In addition to the Fire Danger Ratings map, Red Flag Warning/Fire Weather Watch map, and Daily Burn Restriction map; real-time field observations allow our crews to adjust for work site climate deviations.

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Wildfires can be exacerbated by weather conditions with the main contributing factors being high temperatures, low humidity, and strong winds. Crews evaluate the real-time field fire danger by assessing these three factors. Based on the results of this assessment, crews may implement heightened risk protocols.

3.2 Heightened Risk Protocols

Central Power will require that our contractors either follow Central Power's field work rules as listed in Table 1 below, or contractors that have their own Wildfire Mitigation Plans will be allowed to follow their own Wildfire Mitigation Plan after its requirements are reviewed and approved by Central Power.

By assessing the real-time risk of fire ignition, we provide guidance to our operations team and to those contractors that follow Central Power's field work rules on modifications to work practices. Below are the Heightened Risk Protocol Levels that Central Power will utilize to initiate different operational procedures.

- Level 1
 - Fire Danger Rating is low or moderate, **AND**
 - No Red Flag Warning, **OR**
 - Area designated as Level 1 in real-time field observation
- Level 2
 - Fire Danger Rating is High, **AND**
 - No Red Flag Warning, **OR**
 - Area designated as Level 2 in real-time field observation
- Level 3
 - Fire Danger Rating is Very High or Extreme, **OR**
 - Red Flag Warning **OR**
 - Area designated as Level 3 in real-time field observation

3.2.1 Field Work

Central Power crews and contractors complete tasks that have the potential to ignite fires. Ideally these tasks will be avoided when fire risk is heightened, but in the event, this isn't feasible, the below listed constraints will be in effect for each of the Heightened Risk Protocol Levels for routine work. These limitations may not be possible during power restoration activities due to crew size limitations and the need to restore power as quickly as possible.

Level	Protocol
1	- Continue with work as normal - Monitor fire danger in the area
2	- Additional fire suppression tools loaded on trucks - Designated person periodically monitoring the site for ignitions. - Designated person to remain on-site, monitoring the site for ignitions, for at least 15 minutes after all vehicles have returned to the roadway on other non-flammable driving area.
3	- Avoid work when possible - Fire suppression tools are out on site near work being done - Designated person monitoring the site for ignition. - Designated person to remain on-site, monitoring the site for ignitions, for at least 15 minutes after all vehicles have returned to the roadway or other non-flammable driving area.

Table 1: Operations Heightened Risk Protocol Levels

3.2.2 System Operations

Central Power does not own a control center and instead relies on other entities to perform Transmission Operator (TOP) or power system dispatching functions. Central Power relies on Minnkota Power Cooperative, Otter Tail Power Company, the Western Area Power Administration, and to a limited extent on Montana Dakota Utilities as our Transmission Operators/power system dispatchers. This reliance on outside entities adds a layer of complexity to implementing temporary changes to operational protocols because each dispatch center tends to follow their own protocols when dispatching Central Power's transmission lines to reduce confusion for their dispatching personnel.

Central Power may request that our TOPs/power system dispatchers alter recloser protocols when there is a heightened fire risk, depending on operational constraints and conditions. Patrolling line sections before reclosing is ideal but not always feasible in a timely manner. Central Power's facilities provide electrical power to various life sensitive loads and the risks of extended outages due to the delay

associated with patrolling lines may outweigh the risk of reclosing the lines. Because of this, Central Power will install a Safegrid Intelligent Grid Monitoring System in the Turtle Mountain area, which was identified in Section 2.1 as the only area within Central Power's territory where both the WUI and WHP maps overlap from a heightened risk perspective. The Safegrid system is intended to detect transmission line problems while those problems are at their incipient stages.

In the event of a wildfire that damages a Central Power transmission line, Central Power will perform a line patrol to document all transmission line damage, will repair/replace the damaged section(s) of the transmission line, and will then re-energize the transmission line.

3.2.3 Public Safety Power Shutoff (PSPS)

A Public Safety Power Shutoff (PSPS) would have significant impacts to the Central Power cooperative membership and the reliability of the Bulk Electric System (BES); therefore, Central Power does not intend to perform a PSPS. Central Power reserves the right to perform a PSPS when the assessed impact to safety and reliability dictate to do so.

As a generation and transmission company, Central Power must balance the risk of wildfire ignition with the risk of implementing a PSPS. Below is a list of scenarios Central Power has identified that would outweigh the risk of ignition.

- Line de-energization caused by a PSPS could result in thousands of end users being out of power for a lengthy period.
- High-voltage transmission lines being de-energized have the potential to destabilize the grid.
- Extended outages will have an impact on critical services such as hospitals, fire departments, police departments, and traffic control devices. Additionally, people may be left without heating or cooling for an extended period of time and some of our end-use members rely on home based medical equipment that relies on electrical power.
- A large-scale PSPS could have severe economic impacts, affecting everything from local businesses to entire industries that depend on constant power supply.
- Central Power and its cooperative membership may face public backlash from consumers who rely on constant power supply.

Due to these identified risks, Central Power has decided not to establish a PSPS but will continue to evaluate the need to implement a PSPS if it is found that the risk of wildfire is greater than the impacts of initiating a PSPS.

4. Construction

Central Power's transmission lines range from 43 kilovolts (kV) to 230 kV. When building or rebuilding transmission lines, Central Power uses our internal transmission line construction standards which meet or exceed National Electrical Safety Code (NESC) requirements. Central Power is updating its infrastructure through Central Power's Long Range Plan and Construction Work Plan approval process.

4.1 Central Power's Transmission Line Rebuild Program

Central Power owns infrastructure that dates to the 1960s and Central Power has therefore created a program to evaluate the need and priority for infrastructure upgrades. Central Power evaluates many factors in deciding when a line section should be upgraded. Some deciding factors include:

- Capacity Analysis
- Line patrol inspection reports
- Infrastructure condition/maintenance issues
- Outage statistics
- Age assessment
- Asset criticality

Currently Central Power has a goal of rebuilding 30-35 miles of transmission line per year.

4.2 Central Power Construction Standards

Central Power construction standards meet or exceed NESC standards and are followed on new construction and transmission line rebuilds. Prior to construction, right-of-way corridor clearing is performed to achieve Central Power's standard right-of-way widths compliant with American National Standards Institute (ANSI) Standard A300, Clause 11 (formerly Part 7) wherever possible. While designing new and rebuilt transmission lines, the engineering staff takes into consideration multiple factors, one of which is wildfire risk. During the design phase, engineers consider wildfire risk when finalizing the line design and selecting the material to be used for construction.

Animal contacts with energized equipment are a concern from animal mortality, power system reliability, and fire prevention perspectives. Central Power has introduced construction standard changes to reduce the risk of animal contacts that can cause sparking and fires. Central Power's transmission line construction standards now call for the use of either "H" frame construction or single pole construction using horizontal post insulators instead of crossarms. These structure types have significant spacing between the phase conductors and any grounded components, thereby reducing the possibility of an animal creating a phase to ground fault on a transmission line structure. Exact details of transmission line construction standards can be found in Central Power's Transmission Line Design Standard document (CPEC DS-01).

Central Power also installs protective cover-up on non-insulated energized equipment and conductors where clearance between the energized items and grounded components are at or slightly above code minimums for lower voltages, thereby reducing the possibility of animals creating phase to ground faults. Central Power may modify existing facilities when dead and/or injured animals are found, high-risk lines/equipment are identified, or coordinating agencies express concern.

5. Inspection and Maintenance

Inspections and maintenance are a crucial part of providing safe and reliable power. Central Power has documented procedures providing for the regular inspection and maintenance on transmission lines, substations, and vegetation within the rights of way.

5.1 Inspection and Maintenance Programs

Inspection and maintenance programs are used to guide Central Power personnel in identifying and repairing equipment before faults or failures occur and identifying vegetation hazards within the rights of way. Central Power's inspection types and frequencies for transmission lines, substations, and vegetation can be found in Table 2. For an in-depth overview of each program, please reference their respective procedural documents.

Asset Classification	Inspection Type	Frequency
Sub-Transmission & 115kV Transmission	Ground Patrol	Annually
	Pole Testing	12 years*
230kV High Voltage Transmission	Ground Patrol	Annually
	Aerial Patrol – 230kV Only	Quarterly
Substation	Visual	Monthly
	Detailed	Annually
Vegetation	Ground Patrol	Annually
	Aerial Patrol – 230kV Only	Quarterly

Table 2: Inspection Program Summary

**Central Power schedules approximately 1/12th of all wood poles on our system to undergo pole testing each year, which results in all Central Power wood poles being inspected during each rolling 12-year period. The 12-year time period may vary somewhat depending on factors such as crew availability or weather-related constraints.*

5.1.1 Transmission Line Inspection and Maintenance

Transmission line inspections are broken down into two categories: "Sub-Transmission & 115kV Transmission" and "230kV High Voltage Transmission". Sub-Transmission & 115kV Transmission includes all line sections energized at 115 kV and below. 230kV High voltage Transmission only applies to Central Power's Wilton 230kV line.

5.1.1.1 Transmission Line Inspection Definitions

Ground Patrols – Ground patrols occur in conjunction with day-to-day activities as well as on a cycled basis. As Central Power's operational and engineering staff are in the field, they are advised to visually inspect Central Power assets whenever feasible and document any issues present on the transmission system.

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Pole Testing – Components of pole testing include visual, sound, bore, and partial excavation on wooden structures. Full excavation may be utilized during pole testing when warranted (i.e. early decay or mechanical damage present). Typically, pole testing is performed by a qualified inspection and testing contractor.

Aerial Patrols – Aerial patrols are performed by Basin Electric Cooperative on Central Power’s 230kV Wilton transmission line with the purpose of documenting issues present. Reports are received by Central Power quarterly, reviewed for possible conflicts or issues, and filed for possible future reference.

5.1.1.2 Transmission Line Maintenance

While pole testing, Central Power utilizes NESC clearances and design strength to assess the reject status of in-service wood poles. When a pole does not reach reject status but is showing signs of rot or decay, other factors including location and wildfire risk shall be considered when assessing the reject status of in-service wood poles. If a wood pole is rejected it will be documented using written inspection reports for the immediate future, but these reports will eventually be documented in the GIS system, as Central Power’s GIS system matures, to track maintenance activities and task closeout.

During ground and aerial patrols, Central Power continues using written inspection reports but will eventually use the GIS system to document issues observed. Each item will be given a priority based on factors including reliability, safety, and environmental concerns. Work orders designated as Priority 1 are considered emergent and require immediate attention. Priority 2 work orders are considered urgent. These will be directed to the Operations Superintendent for efficient review and scheduling. Priority 3-5 are considered non-emergent and will be addressed during the line section’s scheduled maintenance year.

5.1.2 Substation Inspection and Maintenance

5.1.2.1 Substation Inspection Definitions

Visual Inspections – Visual inspections are performed by either Central Power employees or Central Power’s member cooperative employees every month. The person inspecting the substation must complete the inspection form for each substation and submit all inspection forms to Central Power monthly. General substation conditions include condition of the perimeter fence, safety signage, vegetation management in/around the substation, and readings from equipment drag hands or gauges, verification that all substation equipment is operating properly.

Detailed Inspections – More detailed annual substation inspections are performed at all Central Power substations by a Central Power employee that is not normally tasked with monthly substation inspections. The annual substation inspections are recorded on substation inspection forms and submitted to Central Power for review and filing. Substations that have any portion energized at 115kV or above also undergo thermal imaging (infrared camera) and partial discharge (acoustic camera) inspections to identify possible problems. The thermal imaging and partial discharge inspections involve the inspector walking around the entire substation with an infrared camera and an acoustic camera while focusing individually on each substation component and each piece of substation equipment. If an abnormal reading is observed, an in-depth analysis of the problem is performed and a corrective action is determined.

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Annual Oil Testing – Annual oil testing involves a qualified contractor retrieving oil samples and testing them to determine the condition of the oil filled equipment. Central Power performs annual testing on all substation transformers rated at 5 MVA or above and on all transformers with unique winding configurations. Transformers rated below 5 MVA with “standard” Central Power winding configurations are tested every five years.

5.1.2.2 Substation Maintenance

Monthly visual inspections result in maintenance when the inspection form is submitted with action items. If any item falls in a category outside of “normal,” the form is forwarded to the operations superintendent for review and maintenance will be scheduled if required. Action items are addressed based on the severity of the issue.

Annual detailed substation inspections result in maintenance when results from the oil test, thermal imaging, or partial discharge tests identify possible problems. Maintenance schedules are determined based on the severity of the identified problem.

5.1.3 Vegetation Inspection and Maintenance

5.1.3.1 Vegetation Inspection Definitions

Ground Patrols – Ground patrols occur in conjunction with day-to-day activities as well as on a cycled basis. As Central Power’s crews are in the field, they are advised to visually inspect Central Power rights of way whenever feasible and document any vegetation issues present on the transmission system.

Aerial Patrols – Aerial patrols are performed on Central Power’s 230kV Wilton Line by Basin Electric Power Cooperative on a quarterly basis with the purpose of documenting vegetation encroachment and maintenance needs.

5.1.3.2 Vegetation Maintenance

Central Power continues to document vegetation maintenance using written reports but will move to using our GIS system as our vegetation management/work management tool as the GIS system matures. All personnel that inspect the rights of way have the capability to add vegetation management work to the current or future vegetation management plan. Central Power has created action thresholds, outlined in Section 6.3 to help guide personnel during inspections.

6. Vegetation Management

Vegetation Management within Central Power is managed by the Transmission Line Engineering department. The right-of-way clearing, trimming, and brush mowing are usually performed by a qualified forestry contractor but can be performed by Central Power crews. Herbicide applications are performed by a qualified contractor as well as Central Power crews. Contractors hired by Central Power must adhere to ANSI A300 Clause 11 (formerly Part 7) whenever possible. Vegetation Management is currently performed using paper documentation but will be transitioned to the GIS system to track work site status as our GIS system matures. Vegetation Management occurs on a cycled basis with maintenance occurring every 3-5 years depending on voltage and line patrol inspection reports.

6.1 Ideal Vegetation Scenario

Central Power strives to achieve our ideal vegetation scenario when clearing on all transmission rights of way. The ideal vegetation scenario constitutes our standard right-of-way widths cleared of all woody vegetation. Wherever feasible, the Wire Zone/Border Zone concept is integrated into the vegetation maintenance program to allow for different types and heights of vegetation in the ROW. This concept separates the ROW into the Wire Zone, directly under the electric phase conductors and the remaining Border Zone (see Figure 4). Generally, the concept allows for different, yet compatible, vegetation types in these separate zones. In the Wire Zone, the vegetation is managed for low growing forbs and grasses. The Border Zone may contain short growing woody species such as shrubs and trees with a maximum mature height of less than 15-feet in addition to the forbs and grasses. The density of Border Zone vegetation should be closely monitored. Dense vegetation in the Border Zone prohibits visibility of tall-growing species and may limit accessibility to the corridor for transmission line maintenance purposes. Central Power standard right-of-way widths vary based on the voltage of the line. Central Power's Ideal Vegetation Scenario is shown in Figure 4.

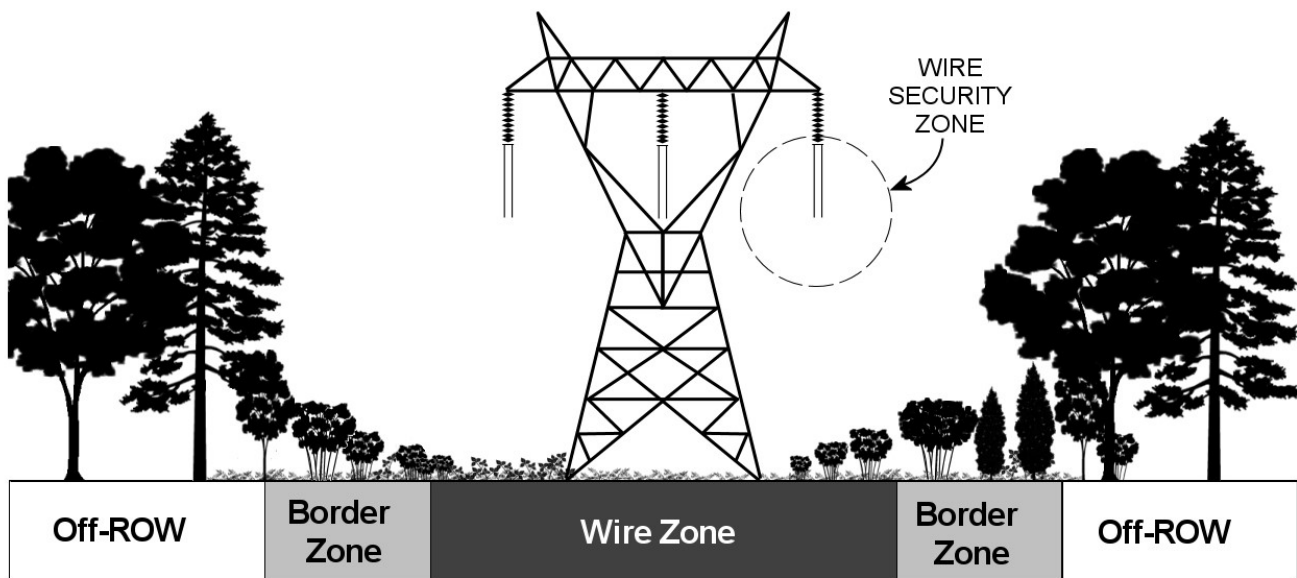


Figure 4: Illustration of Central Power's Ideal Vegetation Scenario consistent with a Wire Zone and Border Zone concept

Figure 4 from Ballard, Benjamin D., Kevin T. McLoughlin, and Christopher A. Nowak. 2007. New Diagrams and Applications for the Wire Zone-Border Zone Approach to Vegetation Management on Electric Transmission Line Rights-of-Way. *Arboriculture & Urban Forestry* 33(6).

The Wire Zone/Border Zone concept may not be appropriate for all ROW conditions and widths. For example, CPEC may maintain buffer zones at stream and river crossings. A detailed site assessment may be required to determine the appropriate ROW management strategy. Although Central Power strives to achieve this ideal scenario in the entirety of its system, it is not always possible due to easement rights and landowner refusals. Central Power does its best to work with landowners to get the greatest achievable clearances to reduce ignition and wildfire risk.

6.2 Control Methods

Central Power utilizes multiple control methods to perform integrated vegetation management. Control methods include:

- Herbicide application
- Hazard and danger tree removal
- Brush mowing
- Trimming

6.2.1 Herbicide Application

Herbicide application results in the reduction of incompatible vegetation within the right of way while promoting the growth of desirable grasses and forbs. Herbicide applications are performed by internal or contracted crews. All applications are to be performed in accordance with state and federal regulations and applied according to the product label.

6.2.2 Brush Mowing

When herbicide application is not feasible or a beneficial option, brush mowing is performed. Brush mowing assists in removing undesirable woody species. Brush mowing, especially when performed in conjunction with herbicide application, reduces woody vegetation that is both an ignition and fuel risk.

6.2.3 Trimming

Trimming is performed to maintain side clearance within the Wire Zone of the ideal vegetation scenario. (Section 6.1 Figure 4) Whenever feasible, Central Power will strive to achieve removals of incompatible species within the rights of way. Where removal is not allowed, trimming may occur to allow sufficient clearance from the line. Trimming will be performed to maintain at minimum NESC clearance. This may vary based on species, location, growth rates, and tree structure. All trimming and pruning shall follow ANSI A300 Pruning Standards.

6.2.4 Hazard Tree Removal

Hazard trees are structurally unsound trees that could strike a target when they fail. Hazard trees can be caused by mechanical and biotic factors. The Central Power territory is often affected by high winds, tornadoes, heavy snow, and ice storms, which can increase the risk of a hazard tree failing and striking the line, making identification and removal important. Hazard trees are identified during ground and aerial inspections.

6.3 Action Thresholds

Action threshold as defined by ANSI A300 Clause 11 (formerly Part 7) is a level of incompatible plant pressure (e.g. species, density, height, location or condition) where vegetation management treatments should occur to prevent conditions reaching the tolerance level. Central Power has established action thresholds based on NESC clearances, which are listed in the Transmission Line ROW Forestry Specification document (CPEC MS-02). Action thresholds are supplied to Central Power field employees and forestry contractors through this document.

6.4 Cycles

Central Power maintains vegetation within the right of way on a cycled basis. Cycles vary primarily based on line voltage, as voltages mandate standard right-of-way widths and clearance expectations. Although it is ideal for the rights of way to be maintained on a cycled basis, there is flexibility to allow for maintenance out of cycle to mitigate risk. Potential causes for mid-cycle maintenance are:

- Trimming due to landowner refusal for removal
- Hazard tree identification
- Unexpected growth rates

7. Readiness and Response

Central Power prepares for wildfire response by developing training, communication, and response procedures.

7.1 Training

Central Power utilizes in-person training to ensure employees stay up to date on safe work practices and procedures. While the WMP includes many practices that have been in place at Central Power predating the plan, there are practices and procedures that will be new to the company. Training on the WMP will be developed over 2026. All field employees and select office personnel that have a direct impact on wildfire prevention will be trained annually. Training topics may include, but are not limited to:

- The WMP
- Fire extinguisher training
- The Emergency Response Plan
- Heightened Risk Protocols
- Reporting an ignition

7.2 Communication Plan

Central Power provides power to its six member-owned distribution cooperatives. Internal and external communication is vital to ensure all stakeholders are aware of potential risk and mass events occurring in our territory.

7.2.1 Internal Communication

Streamlining internal communication increases efficiency during a mass event. Central Power has an Emergency Restoration Plan (ERP) which establishes organizational and personnel assignments, describes emergency communication procedures, and lists emergency contacts. Central Power is working to add a section in the ERP with any special procedures for wildfire response.

7.2.2 Crisis Communication Plan

Emergency events are stressful and can cause disarray, which is why it is important to be prepared prior to events occurring. Central Power's Crisis Communication Plan (CCP) is intended to navigate the communication process during emergency events with member cooperatives, the general public, and more. The CCP was created to prepare the Central Power's Operations department with topics, materials, and communication channels with stakeholders. The plan is reviewed and updated as deemed necessary, but at least annually. Central Power has added a section in the CCP to be used in wildfire response.

7.3 Community Outreach and Collaborations

In addition to Central Power's website, Central Power relies on its six member cooperatives to keep the community informed and educated before and during wildfire season. Community outreach methods include but are not limited to:

- Central Power Electric Cooperative's website
- Central Power's member cooperative communications with their members
- North Dakota Associate of Rural Electric Cooperatives – North Dakota Living Magazine center pages

Central Power is involved in local, regional, and national forums with the aim of ensuring it is performing at a high standard. Collaborating with other utilities has allowed Central Power to gain knowledge and evaluate industry standards. It also allows inclusion in discussions covering new tactics and available technologies as they arise. Central Power participates in the following forums:

- National Rural Electric Cooperative Association (NRECA)
- North Dakota Association of Rural Electric Cooperatives (NDAREC)
- North American Transmission Forum (NATF)

Central Power contacted the North Dakota Department of Emergency Services and many North Dakota County Emergency Managers seeking information on State or local level wildfire protection or mitigation plans. Central Power will participate with State or local wildfire protection or mitigation plans/planning when invited.

8. Review Process

Central Power's WMP is a living document and therefore will be reviewed and updated as necessary for continual improvement. To comply with North Dakota Century Code 49-25, Wildfire Mitigation Plan, the WMP will be reviewed and resubmitted for board approval at least every two years. Topics under review will include:

- Wildfire Hazard Potential
- Companion documents for changes that may impact the WMP
 - Substation and Transmission Line Maintenance Documents
 - Sub-transmission and Transmission Line Design Criteria
 - Transmission Line Right-of-Way Forestry Specification
 - Emergency Restoration Plan
 - Crisis Communication Plan
- Operational practices
- Training materials
- Risk assessment
- Cost of WMP implementation

9. Cost

Estimated cost of implementing the WMP can be found in Table 3. These estimates are based on three-year outlooks and are subject to board approval.

Program Category	2026	2027	2028
Operational Practices	\$50,000	\$50,000	\$50,000
Inspection and Maintenance	\$50,000	\$50,000	\$50,000
Vegetation Management	\$250,000	\$250,000	\$250,000
Readiness and Response	\$20,000	\$20,000	\$20,000
Construction *	\$16,612,000	\$25,649,000	\$13,600,000
WMP Review & Update	\$20,000	\$20,000	\$20,000
TOTAL	\$17,002,000	\$25,679,000	\$13,990,000

Table 3: Cost of WMP Implementation

* 2026 Construction costs include:

- Robinson to Tuttle 43.8kV Transmission Line Rebuild
- Rolla to Rock Lake 43.8kV Transmission Line Rebuild
- Woodworth to Robinson 43.8kV Transmission Line Rebuild
- Woodworth Tap In-Line Breaker Installation
- Transmission Line Pole Enforcer Installation Projects



2027 Construction costs include:

- Lincoln Valley 43.8kV Transmission line Rebuild
- Rangeley Tap Structure Rebuild
- Omega 69kV Transmission Line Rebuild
- Benedict to Crooked Lake 43.8kV Transmission Line Rebuild
- Metigoshe 69kV Tap Line Woodpecker Damage Pole Replacement
- Metigoshe to Kelvin 69kV Tap Line Woodpecker Damage Pole Replacement
- Kelvin to Dunseith 69kV Tap Line Woodpecker Damage Pole Replacement
- Belcourt 69kV Tap Line Woodpecker Damage Pole Replacement
- Brantford Tap to Glenfield 43.8kV Transmission Line Rebuild

2028 Construction Costs Include:

- Fisher Corner to Baldwin 43.8kV Transmission Line Rebuild
- Fisher Corner to Regan Tap 43.8kV Transmission Line Rebuild
- Regan Tap to Wing Tap 43.8kV Transmission Line Rebuild
- Wing Tap to Wing 43.8kV Transmission Line Rebuild
- Gibbs to Menoken Junction 43.8kV Transmission Line Rebuild

10. Revision History

Revision History			
Revision	Effective Date	Initials	Description:
0.0	08/01/2026		Initial version.



Appendix A: Acronym Glossary

BES	Bulk Electric System
CCP	Crisis Communication Plan
CEC	Commission for Environmental Cooperation
GIS	Geographical Information System
NESC	National Electric Safety Code
NWS	National Weather Service
PSPS	Public Safety Power Shutoff
VMPL	Vegetation Management Program Lead
WFAS	Wildland Fire Assessment System
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan
WUI	Wildland Urban Interface
