



WILDFIRE MITIGATION PLAN

**Grand Electric
Cooperative, Inc.**

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1 Introduction/Executive Summary

In the face of increasingly destructive wildfire seasons, South Dakota Senate Bill 36 (SB 36), codified at South Dakota Codified Laws Chapter 49-49 (Wildfire Mitigation Plans), authorizes qualified electric utilities operating in South Dakota to develop, adopt, and implement comprehensive wildfire mitigation plans. These plans must include strategies for inspecting and operating electric infrastructure, performing vegetation management, upgrading facilities where appropriate, and coordinating with wildfire response agencies. A utility that maintains an approved and published wildfire mitigation plan and substantially complies with its provisions is not subject to strict liability for wildfire damages, except in cases of willful and wanton misconduct or criminal conduct.

Fire mitigation is an essential part of Grand Electric Cooperative's (GEC) operational practices. Over the years, GEC has adopted fire mitigation programs to adjust to changes in the burning environment and has incorporated technological advances and improved operational practices to further mitigate the potential for ignitions and more effectively respond to elevated wildfire-risk conditions.

1.1 Purpose of the Plan

The Plan describes GEC's strategies, programs, and procedures to mitigate the threat of electrical equipment-ignited wildfires and addresses the unique features of its service territory, including topography, weather, infrastructure, grid configuration, and areas most prone to wildfire risk. This includes the inspection and maintenance of its transmission and distribution (T&D) assets, as well as the management of vegetation within rights-of-way containing those assets. This Plan is developed in accordance with South Dakota Codified Laws, Chapter 49-49 (Wildfire Mitigation Plans), as enacted by South Dakota Senate Bill 36, which authorizes qualified electric utilities to establish and implement wildfire mitigation plans.

GEC's Board of Directors reviews and approves the Plan as needed, while the Manager of Electric Operations is responsible for its implementation. Primary accountability for plan implementation resides with the General Manager.

1.2 Objectives of the WMP

The main objective seeks to implement an actionable plan to create increased reliability and safety while minimizing the likelihood that GEC assets may be the origin or contributing factor in the ignition of a wildfire. The mitigation programs and strategies will comply with current and anticipated South Dakota State law, and the 2023 National Electrical Safety Code (NESC) regulations and guidelines.

The secondary objective is to measure, through the annual evaluation of certain performance metrics, the effectiveness of the specific wildfire mitigation strategies. Where a

particular action, program component, or protocol proves unnecessary or ineffective, GEC will assess whether modification or replacement is suitable.

1.3 Utility Profile and History

Grand Electric Cooperative is committed to providing safe, reliable, and affordable electric service to rural communities across northwest South Dakota and beyond. Its roots trace back to July 12, 1946, when the Upper Grand River Electric Association was organized in Bison. At that time, virtually no rural electric service existed in the area. In response to the need for power, local residents came together under the framework of the Rural Electrification Act to bring electricity to their farms, ranches, and homes. On January 9, 1950, the organization officially transitioned to Grand Electric Cooperative, Inc., continuing its mission of rural electrification and member-owned service.

Today, Grand Electric serves 1,878 members through 5,273 meters across nearly 8,000 square miles of rugged, rural territory. The cooperative maintains over 4,000 miles of power line, delivering electricity to homes, farms, ranches, and businesses. Grand Electric serves 7 counties, including all of Harding County and Perkins County, along with portions of Butte County, Corson County, Ziebach County, and Meade County in South Dakota, as well as a portion of Carter County in Montana.

Headquartered in Bison, SD, Grand Electric also operates an outpost in Buffalo, SD, to efficiently serve its widespread membership.

Grand Electric is a member-owner of Basin Electric Power Cooperative, a regional generation and transmission cooperative formed in 1961 to supply wholesale power to rural electric systems. Basin Electric was created by distribution cooperatives to ensure a reliable and affordable power supply as demand grew, and today it provides a diverse mix of generation and a strong transmission network across several states.

The cooperative is governed by a nine-member board of directors, elected from the membership. These local leaders set policy and provide strategic direction, ensuring the cooperative remains focused on the needs of the communities it serves. Daily operations are managed by a General Manager and dedicated staff, including line workers who maintain infrastructure and respond to outages.

Grand Electric Cooperative remains focused on reliability, safety, and meeting the needs of its members, now and into the future.

1.4 The Service Area

Operating out of its headquarters in Bison, with an additional outpost in Buffalo, Grand Electric Cooperative serves a large, sparsely populated rural region of Northwest South Dakota. The cooperative provides electric service to all of rural Perkins and Harding Counties, including the towns of Bison and Buffalo, as well as portions of Butte, Corson, Ziebach, and Meade Counties in South Dakota, and a portion of Carter County in Montana. Service is provided to rural homes, farms, ranches, small communities, and unincorporated areas across nearly 8,000 square miles. (Figure 1)

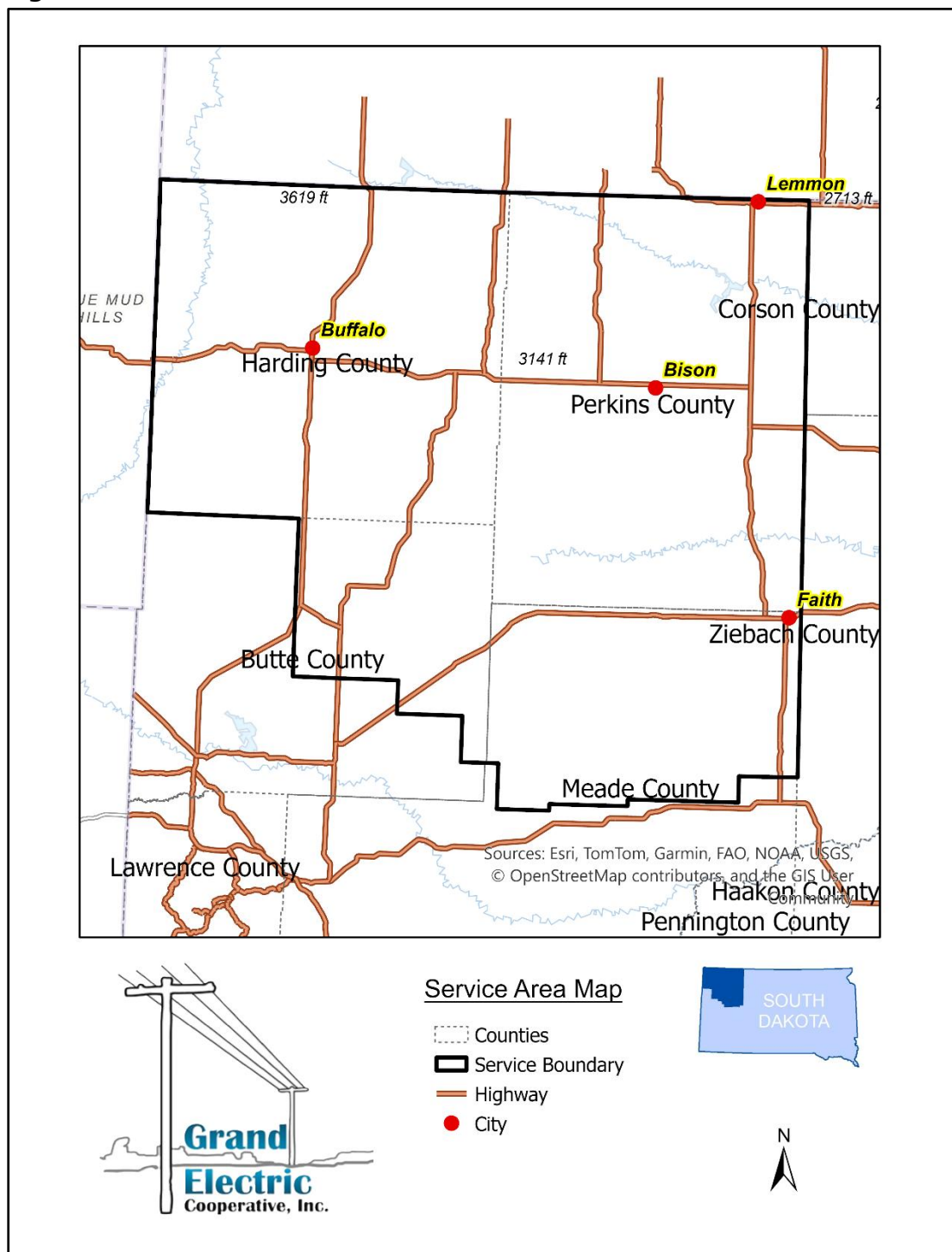
The region is characterized by a semi-arid continental climate, influenced by strong winds, low humidity, and wide temperature variations. Summers are typically warm, dry, and windy, while winters can be long, cold, and severe. Temperatures commonly range from below zero in the winter to over 100°F in the summer. Annual precipitation is relatively low, generally between 10 and 20 inches, with snowfall occurring from late fall through early spring.

Grand Electric's service area is dominated by open prairie, rolling hills, and badlands terrain. Vegetation is primarily grassland, with more concentrated tree growth found along river bottoms, shelterbelts, and draws. A significant portion of the cooperative's territory includes federally managed lands, particularly the Grand River National Grassland in Perkins County and areas of the Custer Gallatin National Forest located in Harding County. These lands contribute to the region's rural, undeveloped nature and present unique considerations for line construction, maintenance, and access.

Drought is a recurring concern, and wildfire season typically spans late spring through early fall. High winds, dry fuels, and low humidity can elevate fire danger, making vegetation management and system reliability critical priorities for the cooperative.

Topography across the system varies from relatively flat rangeland to rugged buttes and breaks, particularly in western portions of the service territory. Elevations generally range from approximately 2,500 to over 3,500 feet above sea level. The expansive, rural nature of the system requires significant infrastructure, with more than 4,000 miles of line serving a relatively small membership.

Figure 1. Service Area



1.5 Utility Asset Overview

Grand Electric Cooperative owns and maintains a diverse range of utility assets necessary to provide reliable electric service across its large, rural territory. The cooperative's primary facilities include its main office located in Bison and a satellite outpost in Buffalo. These locations serve as operational hubs for administrative functions, system control, and field crew deployment. Both sites also include storage yards used for staging materials, equipment, and maintenance supplies essential for day-to-day operations and storm response.

Grand Electric's electric system consists of both transmission and distribution (T&D) infrastructure designed to serve a wide geographic area. The cooperative operates approximately 174 miles of transmission line, delivering power at voltages of 69kV and 115kV to its substations. These transmission assets are critical for bringing wholesale power into the system and ensuring reliability across the network.

At the distribution level, Grand Electric maintains 2,995 miles of overhead distribution line and 725 miles of underground distribution line. The system operates primarily at 14.4/24.9kV, allowing for efficient delivery of electricity to homes, farms, ranches, and businesses throughout the service territory. The mix of overhead and underground infrastructure helps balance reliability, cost, and environmental considerations in a region subject to wind, ice, and wildfire risk.

The cooperative also operates a total of 10 substations, including 7 distribution substations and 3 transmission substations. These facilities play a vital role in stepping down voltage and distributing power safely and efficiently to end users.

In addition to electrical infrastructure, Grand Electric's non-electrical assets, including office facilities, storage yards, fleet vehicles, and specialized equipment, are essential to maintaining system operations and responding to outages. Together, these assets enable the cooperative to deliver dependable service across more than 4,000 miles of line in a challenging rural environment.

Table 1 provides a high-level description of GEC's T&D assets.

Table 1. Asset Overview

ASSET CLASSIFICATION	ASSET DESCRIPTION
Transmission Line Assets	Approximately 174 miles of conductor, transmission structures, and switches at 115 and 69 kilovolts (kV).
Distribution Line Assets	Approximately 2,995 miles of overhead (OH) and 725 miles of underground (UG) conductor, cabling, transformers, voltage regulators, capacitors, switches, line protective devices operating at or below 24.9/14.4 kilovolts (kV).
Substation Assets	Major equipment such as power transformers, voltage regulators, capacitors, reactors, protective devices, relays, open-air structures, switchgear and control houses in 10 substation/switchyard facilities.

1.6 Overview of Utility's Fire Prevention Strategies

This WMP integrates and interfaces with GEC's existing operations plans, asset management, and engineering principles, which are themselves subject to change. Future iterations of the WMP will reflect any changes to these strategies and will incorporate new best management practices as they are developed and adopted.

Table 2 summarizes GEC's five mitigation components with associated programs and activities that support GEC's ongoing commitment to wildfire prevention and mitigation.

Table 2. Mitigation Strategies/Activities

DESIGN AND CONSTRUCTION
Strategic undergrounding of distribution lines
Field recloser to vacuum-type breaker change-out program
Covered jumpers and animal guards
Avian protection construction standards
Substation perimeter fencing for security and protection
INSPECTION AND MAINTENANCE
Infrared inspections of substation equipment
Unmanned Aerial Vehicle (UAV) T&D line inspections when necessary
Wood pole intrusive inspection and testing
Ongoing safety observations and detailed inspections of transmission and distribution facilities
T&D system vegetation management program
OPERATIONAL PRACTICES
Work procedures and Fire Hazard training for persons working in locations with elevated fire-risk conditions
Community outreach/wildfire safety awareness
Staff safety training and orientation for vegetation management work
Fire suppression equipment on worksite during fire season
Provide liaison to county offices of emergency services (OES) during fire event
SITUATIONAL AWARENESS
Weather Monitoring in the service area
Monitoring active fires in the Service area
RESPONSE AND RECOVERY
Coordination with local Department of Emergency Management
Customer assistance programs for post-disaster recovery
Line patrols before re-energization

2 Risk Analysis and Risk Drivers

GEC assesses the key risk factors tied to its utility facilities. By identifying the primary drivers of risk, the company can develop targeted mitigation strategies to reduce overall operational risk exposure. For instance, if wildfire risk stems from potential equipment failure, increasing inspection frequency or enhancing maintenance practices can help lower that risk; or risks arise from power lines coming into contact with third-party objects (e.g., trees, vehicles, or structures), installing more resilient conductors can effectively mitigate that specific hazard.

Fire Risk Drivers Related to Construction and Operations

GEC staff evaluated other utilities' fire causes and applied its own field experience to determine the critical potential risk drivers. The categories listed below were identified as having the potential for causing power line sparks and ignitions:

- Equipment/facility failure
- Pole failure
- Foreign contact
- Standard expulsion fuses
- Cross-phasing
- Age of assets
- Vandalism

2.1 Fire Risk Drivers Related to the Service Area

- Accessibility
- Climate
- Vegetation Types / fuels
- Fire history
- Tree mortality / tree failure
- Lightning
- Fire Weather

2.2 Key Risk Impacts

Ignitions caused by the aforementioned risk drivers have many possible outcomes. The list below outlines some of the worst-case scenarios and consequences:

- Personal injuries or fatalities to the public, employees, and contractors
- Damage to public and/or private property
- Damage and loss of GEC-owned infrastructure and assets
- Impacts to reliability and operations
- Damage claims and litigation costs, as well as fines from governing bodies
- Damage to GEC's reputation and loss of public confidence

2.3 Wildfire History and Outlook

Fire history and regional data indicate that the primary wildfire season in northwest South Dakota occurs from late winter through spring, generally February through May, with peak activity in March and April. During this period, Grand Electric Cooperative's service territory experiences elevated fire risk due to dormant grasses, low relative humidity, and frequent high winds. These conditions allow wildfires to ignite easily and spread rapidly across open rangeland and prairie landscapes.

Large wildfires in this region have most commonly occurred in open grasslands across Perkins, Harding, and Corson counties, where continuous fuels and strong winds allow fires to spread rapidly and travel long distances. These events are often driven by frontal weather systems that produce sustained high winds and rapidly changing conditions, increasing both fire intensity and the difficulty of suppression efforts.

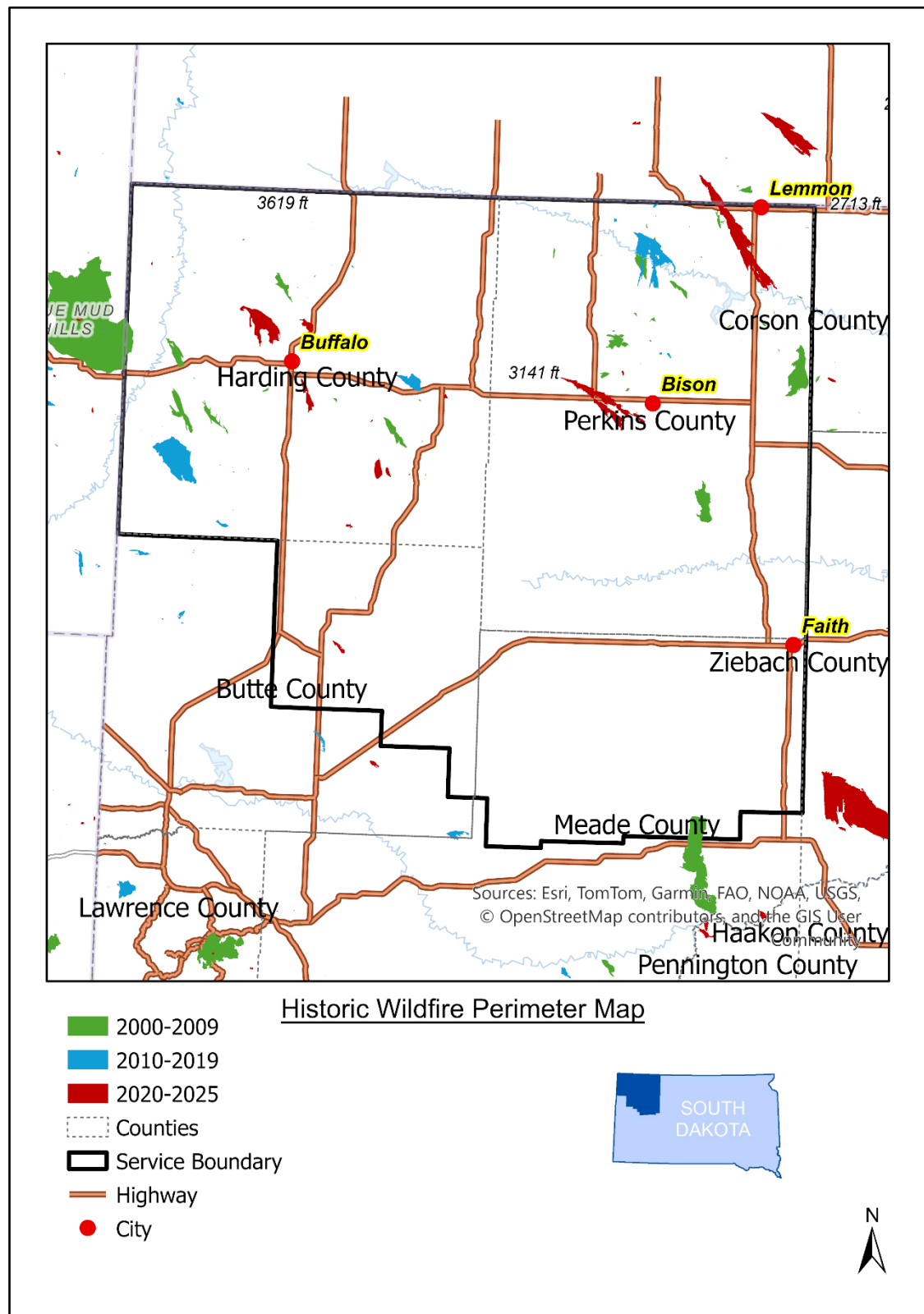
The majority of large wildfires in northwest South Dakota are human-caused. Typical ignition sources include escaped prescribed burns, debris burning, agricultural and ranching equipment, vehicle-related sparks such as dragging chains, and electrical infrastructure. Under extreme weather conditions, even a small ignition can quickly escalate into a large-scale event.

Wildfire suppression in Grand Electric Cooperative's service territory is primarily handled by local volunteer fire departments, supported by county emergency management, the South Dakota Wildland Fire Division, and mutual aid partners. However, the rural nature of the area, combined with long travel distances and limited personnel and equipment, can challenge response efforts during fast-moving or large incidents.

Climate variability and long-term climate trends are also influencing wildfire risk in the region. Warmer temperatures, changing precipitation patterns, and periods of prolonged drought can lead to earlier curing of grasses, extended fire seasons, and increased fuel availability. These factors contribute to a greater likelihood of large and more intense wildfires over time.

Fire activity typically declines following spring green-up, when increased fuel moisture limits fire spread potential.

Figure 2. Historic Wildfire Perimeters 2000-2024



2.4 Wildland Urban Interface

The USFS defines the wildland urban interface (WUI) as a place where humans and their development meet or intermix with wildland fuel and is composed of both interface and intermix communities. The distinction between the two is based on the characteristics and distribution of houses and wildland vegetation across the landscape.

Interface WUI

Interface is defined as those areas where human development meets areas that are covered with more than 50% wildlands. To be considered an “interface” land area, development or structures must be bordered by wildlands on at least one side.

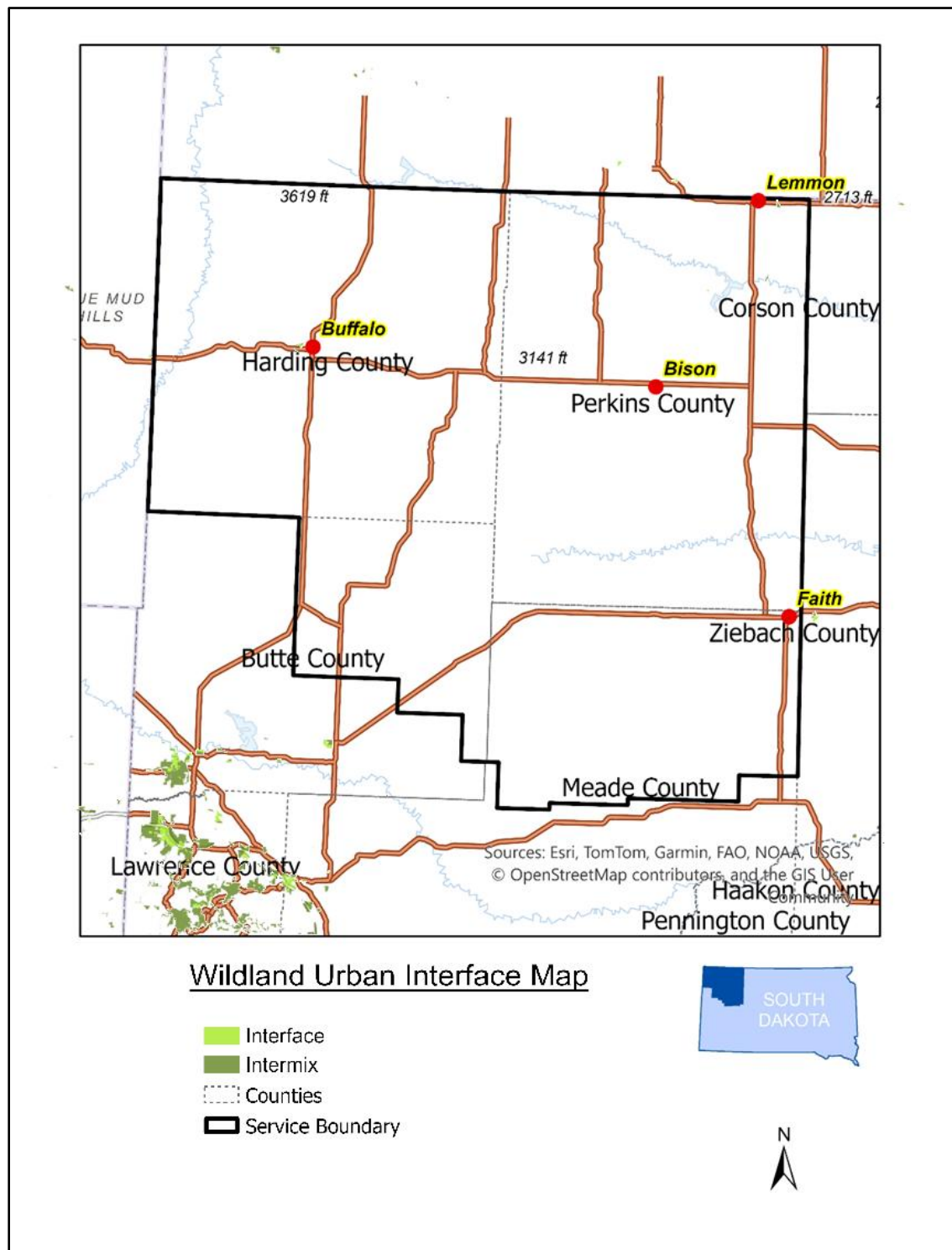
Intermix WUI

Intermix refers to areas where housing and wildland vegetation intermingle. To be considered intermix, a development or structure must be surrounded on two (2) or more sides by wildlands. Intermix is often found between the Interface and the wildlands.

Wildlands

For the purposes of this map, “wildlands” are defined as any area without any structures or human development that also have more than 50% burnable vegetated cover including grasslands and sagebrush-steppe. However, most wildlands could eventually become intermix, interface, or even urban areas. For example, a new single-family home in the woods could make wildlands into intermix, while a new housing development, strip mall, or other series of structures could turn a section of wildlands into interface.

Figure 3. Wildland Urban Interface



2.5 Fire Threat Assessment Mapping

The Wildfire Hazard Potential (WHP) map used in this plan is a raster geospatial dataset produced by the USDA Forest Service, Fire Modeling Institute (FMI). It is intended to inform evaluations of wildfire risk or prioritization of fuels management needs across large landscapes. The specific objective of the WHP map is to depict the relative potential for wildfire that would be difficult for suppression resources to contain.

The WHP-2023 dataset was built upon:

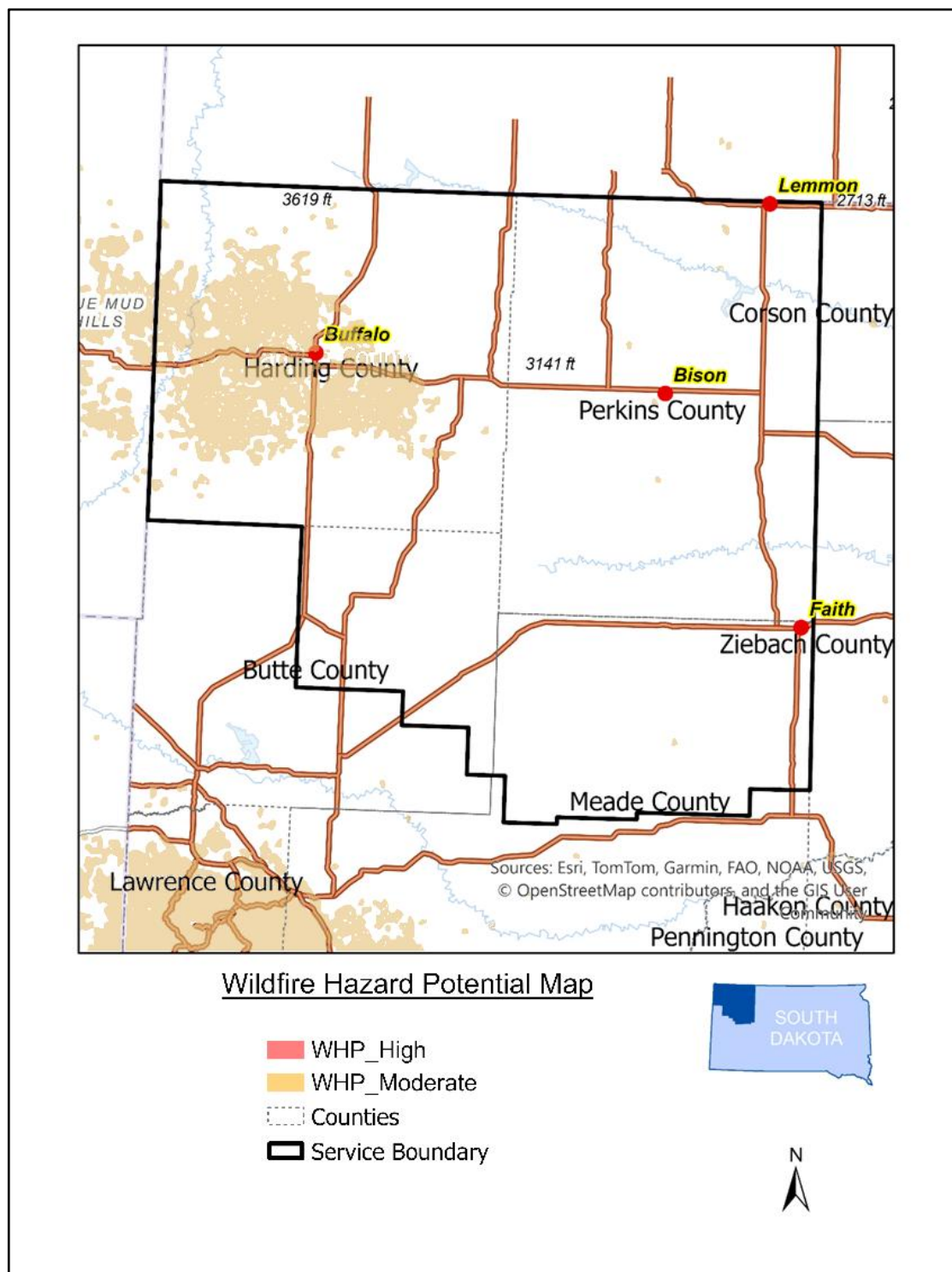
- Spatial vegetation and wildland fuels data from *LANDFIRE 2020* (version 1.4.0). The *LANDFIRE* Fire Behavior Fuel Models layer is a primary input to the FSim Burn Probability (BP) and Fire Intensity Level (FIL) datasets and forms the foundation for WHP.
- Spatial datasets of wildfire likelihood and intensity were generated for the conterminous U.S. with the *Large Fire Simulator* (FSim). FSim simulates the growth and behavior of hundreds of thousands of fire events for risk analysis across large land areas using geospatial data on historical fire occurrence, weather, terrain, and fuel conditions. Effects of large-fire suppression on fire duration and size are also simulated. This research aims to develop a practical method of quantifying geospatial wildfire impacts, including annual probabilities of burning and fireline intensity distributions at any point on the landscape.
- Point locations of past fire occurrence from 1992 through 2020

Areas mapped with higher WHP values represent fuels with a higher probability of experiencing torching, crowning, and other extreme fire behavior under conducive weather conditions. An essential aspect of the WHP method is the use of "resistance to control weights" at the end of the mapping process. This serves to reduce the WHP index in areas with light fuels, such as grass and shrubs. A smoothing process was applied to the raw data and the Very Low and Low tiers removed from the map. The High and Very High tiers were also combined to form the High-risk tier. This helps to inform where forest fuel reduction treatments and mitigations might be most needed.

On its own, WHP is not an explicit map of wildfire threat or risk, but when paired with spatial data depicting highly valued resources and assets such as communities, structures, or powerlines, it can approximate relative wildfire risk to those resources and assets. WHP 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.

The WHP map is used to prioritize vegetation management activities, determining the location for focused recloser operational protocols, and future sectionalizing studies and associated remedial actions.

Figure 4. Service Territory WHP Overview



2.5.1 Assets Within Wildfire Threat Index Tiers

Table 3 provides a high-level overview of GEC's various T&D assets relative to the Wildfire Hazard Potential tiers shown in the WHP map above (Figure 4).

Table 3. Overview of T&D Assets within WHP Tiers

Assets	Total	Low		Moderate		High	
	Line-miles	Line-miles	%	Line-miles	%	Line-miles	%
115 kV OH Transmission	56	36	63%	20	36%	0	0%
69 kV OH Transmission	118	103	87%	15	13%	0	0%
24.9 kV OH Distribution	2995	2634	88%	360	12%	0	0%
24.9 kV UG Distribution	725	703	97%	22	3%	0	0%
Totals							
Total OH Transmission	174	138	79%	36	20%	0	0%
Total OH Distribution	2995	2634	88%	360	12%	0	0%
Total UG Distribution	725	703	97%	22	3%	0	0%
Total Substations	10	9	90%	1	10%	0	0%

3 Operational Practices

This chapter describes the operational practices, preventive strategies, and programs implemented, or planned for implementation, to reduce the risk of wildfire ignition associated with the cooperative's electric facilities. These measures focus on minimizing ignition potential under elevated fire-risk conditions while maintaining system safety and reliability. The chapter outlines key operational controls and adaptive practices that may include, but are not limited to, public safety power shutoff (PSPS) protocols, recloser operational practices, pilot programs, and the evaluation and deployment of emerging technologies intended to reduce ignition risk and improve situational awareness.

Table 4. Activities That Address Wildfire Risk Factors

RISK FACTOR	MITIGATION ACTIVITY
Fuel Source	• Vegetation Management • ROW maintenance • Current-limiting fuses
Extreme Weather	• National weather service monitoring • Preemptive power shutdown during ongoing wildfires • Emergency preparedness community outreach and education
Contact with Foreign Objects	• Wildlife guards • Avian Protection construction standards • Insulated equipment • Covered Jumpers • Underground conversion of distribution lines • Hazard tree removal
Equipment Failure	• Routine Maintenance • Design and construction standards to reduce ignition sources • Transmission line detailed inspections and ongoing safety observations • Distribution line detailed inspections and ongoing safety observations • De-energizing or alternate settings of lines during certain conditions • Infrared inspections of substation equipment • Wood pole test and treatment program
Field Work	• GEC worker/contractor education on fire ignition sources • Tailgate meetings before fieldwork • Land agencies fire season requirements

3.1 De-energization – Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) preemptively de-energizes power lines during high wind events combined with hot and dry weather conditions. When considering de-energization, GEC

examines the impacts on fire response, water supply, public safety, and emergency communications.

GEC considers the external risks and potential consequences of de-energization while striving to meet its main priority of protecting the communities and members we serve. They include:

- Potential loss of water supply to fight wildfires due to loss of production wells and pumping facilities.
- Negative impacts to emergency response and public safety due to disruptions to the internet and mobile phone service during periods of extended power outages.
- Loss of key community infrastructure and operational efficiency that occurs during power outages.
- Medical emergencies for members of the community requiring powered medical equipment or refrigerated medication. Additionally, the lack of air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities.
- Negative economic impacts from local businesses forced to close during an outage.
- The inability to open garage doors or motorized gates during a wildfire event can lead to injuries and fatalities.

GEC will also consider the ability of cooperative personnel to reasonably access the affected powerline and associated facilities before and after a potential de-energization event. Factors may include terrain, road conditions, weather, fire activity, right of way access, and the ability of personnel and equipment to safely reach the affected facilities.

The risks and potential consequences of initiating a PSPS are significant and extremely complex. Based on the above considerations, GEC reserves the option of implementing a PSPS when conditions dictate. While GEC believes the risks of implementing a PSPS far outweigh the chances of its electric overhead distribution system igniting a catastrophic wildfire, the PSPS provides a last resort tool and another mitigation option in a potential crisis.

On a case-by-case basis, GEC has historically and will continue to consider de-energizing a portion of its system in response to a known public safety issue or response to a request from an outside emergency management/response agency. Any de-energizing of the lines is performed in coordination with key local partner agencies, however, the final determination is made by GEC.

3.2 Recloser Operational Practices

The GEC electric system operates a combination of electronic and oil-filled reclosers; electronic recloser units are adjusted remotely through the SCADA system if equipped with communications, while the traditional, oil-filled units, and electronic reclosers not equipped with communications are manually adjusted.

When weather forecasts or real-time weather station information indicates high fire threat conditions, GEC may operate select distribution lines with a more sensitive protection scheme, such as putting certain circuits in the substation on “hotline tag” which is an instantaneous trip on a fault.

De-energized circuits must be patrolled prior to re-energizing to ensure no vegetation, downed conductor, or other clearance issues are impacting the lines. While these measures are intended to reduce the risk of ignition, the required safety patrols may lead to prolonged customer outages.

3.3 Situational Awareness

Situational assessment is the process by which current operating conditions are determined. Situational Awareness is the understanding of the working environment, which creates a foundation for successful decision-making and the ability to predict how it might change due to various factors.

GEC’s System Operators rely on various resources to monitor evolving fire weather and climatological conditions that may lead to fire events. Sources for weather information include, but are not limited to the following:

- **The National Weather Service (NWS):** The NWS provides on-line predictive fire weather forecasting tools in the form of a current fire-weather outlook, 2-day, and a 3-8 day outlook. (https://www.spc.noaa.gov/products/fire_wx/)
- **NOAA Weather and Hazards Data Viewer:** This on-line map provides historic or real-time surface observations including wind speed and direction, wind gust, dew point, relative humidity, and sea level pressure collected from remote automated weather stations (RAWS). Extreme-weather alerts such as fire weather watch, high wind watch, and red flag warning are provided from this resource. (<https://www.weather.gov/wrh/hazards>)

4 Fire Mitigation Construction

This section outlines any construction standards or designs in use to reduce the likelihood of an ignition. Examples include:

- Steel poles on transmission lines
- Increased conductor spacing
- Undergrounding of distribution lines
- Polymer crossarms

4.1 Emerging Technologies

GEC has initiated various pilot projects to explore new technologies and best management practices. These pilot projects will serve to evaluate the effectiveness of emerging technologies while controlling unwarranted expenditures on unproven methods. GEC may elect to integrate these technologies or practices into its ongoing maintenance programs based on the outcomes. These technologies include, but are not limited to non-expulsion fuses, thermal imaging cameras, and electronic reclosers.

4.2 Avian Protection

Since 2012, GEC has employed design and construction standards to protect raptors, migratory birds, and other wildlife. Avian protection measures have been shown to reduce the collision and electrocution risks and the number of birds injured. Consequently, avian protection measures also reduce the potential for fire ignitions while helping to prevent power outages. Avian interactions are considered in the design and installation of new facilities, as well as the operation and maintenance of existing structures. Construction standards include but are not limited to:

- 10' cross arms to achieve 60" of phase separation
- Covered wire for jumpers and stingers
- Caps on surge arresters, energized bushings, and terminators
- Bushing covers on transformers, capacitors, reclosers, and regulators
- Bird flight diverters
- Replaced double crossarms with single fiberglass crossarms to limit nesting where needed
- Elevated nesting platforms
- Perch deterrents

The construction specifications listed above are used where a need has been identified, and not necessarily at every structure. These safety measures have reduced the potential for fire ignitions while also assuring compliance with the Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act (BGEPA), and the Endangered Species Act (ESA).

4.3 Circuit Recloser Upgrade

An automatic circuit recloser is a protective device designed to interrupt electrical faults and automatically restore service when appropriate. Modern electronic vacuum reclosers provide improved reliability, lower maintenance requirements, and enhanced protection capabilities when compared to legacy oil-filled equipment.

GEC has replaced nearly all older oil-filled field reclosers on its system with modern electronic vacuum reclosers. This modernization effort improves system reliability, reduces maintenance requirements, and provides greater flexibility in configuring protection schemes during normal operations and elevated fire-risk conditions. These devices also support future integration of advanced monitoring and control technologies as communications infrastructure and operational needs evolve.

4.4 Copper Replacement Program

GEC has made proactive efforts to identify, locate, and replace the CopperWeld conductor remaining on its distribution system. When planning copper replacement projects, the priority is to upgrade circuits with higher customer density, with additional consideration given to areas with elevated wildfire risk. While the cooperative has a minimal amount of CopperWeld in its system, its goal is to fully replace the remaining CopperWeld in its future work plans.

4.5 System Monitoring – SCADA

GEC utilizes Supervisory Control and Data Acquisition (SCADA) technology to monitor and control portions of its electric system. SCADA provides system operators with real-time visibility into transmission and substation operations, allowing for faster identification of outages, equipment alarms, and abnormal operating conditions. This improved situational awareness supports more efficient system operations and enables personnel to respond more quickly to emerging reliability concerns.

SCADA monitoring also assists operators during wildfire, storm, and other emergency events by providing timely information regarding circuit status, equipment operations, and system conditions. The transmission system is monitored and controlled through the SCADA network, providing operators with the ability to remotely monitor key facilities and support restoration activities when outages occur.

As GEC continues to evaluate future system modernization opportunities, additional monitoring and communications technologies may be considered where they provide operational, reliability, or wildfire mitigation benefits.

5 Infrastructure Inspections and Maintenance

GEC maintains a formal inspection and maintenance program for distribution, transmission, and substation equipment which plays an essential role in the prevention of wildfire. GEC personnel perform ongoing safety observations while traveling throughout the system and conducting routine operational and maintenance activities. Table 5 summarizes the inspection schedule for all assets, while the following sections outline inspection practices for the utility.

Table 5. Inspection Program Summary

ASSET CLASSIFICATION	INSPECTION TYPE	FREQUENCY
Transmission	Ongoing Safety Observations	During normal field operations
	Detailed Inspection	Every 7 years
	Wood Pole Test and Treatment	Every 10 years
Overhead Distribution	Ongoing Safety Observations	During normal field operations
	Detailed Inspection	Every 10 years
	Wood Pole Test and Treatment	Every 10 years
Underground Distribution	Ongoing Safety Observations	During normal field operations
	Detailed Inspection	Every 10 years
Substation	Routine Inspection	Monthly
	Detailed Inspection	Annually
	Infrared Inspection	Annually

5.1 Definition of Inspection Levels

1. **Ongoing Safety Observations:** Visual observations of utility equipment and structures made by field personnel during normal operational activities, including outage response, maintenance, construction, and service work. These observations provide opportunities to identify obvious structural concerns, vegetation encroachments, and other visible hazards between scheduled inspections. Ongoing Safety Observations do not replace the detailed inspections and other scheduled inspection activities identified in Table 5.
2. **Detailed Inspection:** Individual pieces of equipment and structures are carefully examined visually and through use of routine diagnostic testing as appropriate. If practical and useful information can be gathered, equipment may be opened and the condition rated and recorded.
3. **Intrusive Pole Inspection:** Inspections involving the movement of soil, taking samples of the wood pole for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections.

5.2 Ongoing Safety Observations

Grand Electric Cooperative conducts ongoing safety observations as line crews travel throughout the system performing their daily work activities. While responding to outages, completing maintenance, constructing new services, or performing other routine tasks, employees observe and document potential safety concerns and equipment deficiencies.

Using field observation and electronic mapping and work management tools, employees identify conditions such as low conductor clearances, unauthorized attachments, excessive splicing, slack guy wires, broken insulators, vegetation encroachments, physical damage, facility deterioration, and bird nests. Any deficiencies identified are documented and prioritized based on risk to public safety, system reliability, and wildfire potential.

Inspection data is used to plan maintenance and construction projects, prioritize work in higher-risk areas, improve system reliability, and support Grand Electric's wildfire mitigation efforts. All findings and corrective actions are tracked and retained according to cooperative record retention policies.

5.3 Detailed Inspections of Transmission and Distribution Lines

Grand Electric Cooperative conducts detailed inspections of its electric distribution facilities on a ten-year cycle to ensure the safety, reliability, and integrity of the system. Inspections include poles, conductors, hardware, transformers, overhead communication attachments, right-of-way conditions, vegetation encroachments, and required clearances.

Grand Electric Cooperative conducts detailed inspections of its transmission facilities on a seven-year cycle to ensure the safety, reliability, and integrity of the system. Inspections include poles, conductors, hardware, overhead communication attachments, right-of-way conditions, vegetation encroachments, and required clearances.

Inspection findings are documented and tracked using a mobile mapping application. Field personnel record deficiencies, locations, and recommend corrective actions. Inspection records and completed corrections are retained electronically within the mapping system.

Deficiencies are prioritized based on safety, reliability, and wildfire risk. Immediate hazards are addressed promptly, while less critical issues are incorporated into maintenance and construction work plans. Inspection data is used to identify aging infrastructure, recurring problem areas, and high-risk locations, helping prioritize future maintenance activities and system improvement projects.

5.4 Wood Pole Testing and Treatment

To maintain the integrity and reliability of its distribution system, Grand Electric Cooperative maintains a formal Wood Pole Assessment Program. The goal of the program is to inspect approximately 10% of the system's wood poles each year.

Wood pole inspections are performed by Grand Electric personnel using a resistance-measuring drill to evaluate the internal condition of each pole. Circuits are identified, mapped, and scheduled for inspection using the cooperative's mapping system and asset records.

Poles are evaluated to determine whether they continue to meet NESC strength and safety requirements. Poles exhibiting signs of decay, rot, insect damage, or other structural deficiencies are flagged for replacement and changed as soon as practical. Test results from the resistance-measuring drill are downloaded, retained electronically, and used to track pole condition over time and support future maintenance planning.

The data collected through the inspection program helps identify aging infrastructure, prioritize replacement projects, and maintain a safe and reliable electric system.

5.5 Substation Inspections

The Preventive Maintenance Plan provides for regular inspections of Grand Electric's substations on a 30-day cycle. Qualified personnel will use prudent care while performing inspections following all required safety rules to protect themselves, other workers, the general public, and the system's reliability.

The substation inspection involves a thorough review of substation equipment to confirm that there are no structural or mechanical deficiencies, hazards, or tree trimming requirements.

Individual pieces of equipment and or structures receive careful visual examination and routine diagnostic tests as appropriate.

5.6 Prioritization of Repairs

GEC considers and prioritizes maintenance work by assessing the most urgent needs. The inspector will document the overhead and underground systems condition, recording defects, deterioration, violations, safety concerns, or any other factors requiring attention on the inspection records. The inspection shall focus on any hazards that could affect the system's integrity or the safety of line workers and the public.

Inspection data (overhead & underground) will be prioritized and issued as follows:

Priority # 1 – Immediate hazard: Conditions that may affect the integrity of the system or present a hazard to workers or the general public. Priority #1 will be responded to immediately and appropriate action taken until the hazardous condition is remedied.

Priority # 2 – Non-emergency repair condition: Conditions that require maintenance that can be scheduled to maintain the integrity of the system. Priority #2 will be prioritized by urgency and will be scheduled to have appropriate repairs made to correct the condition within two years where practicable. If the Priority Level 2 issue is located in a High Risk zone and poses a potential fire risk, correction of the deficiency will occur as soon as the schedule allows.

Priority # 3 – Non-emergency repair condition: Conditions that do not present a situation that could jeopardize the safety of the system, line workers and the general public. Priority #3 will be documented with a recommended repair interval. In the judgment of the Manager of Electric Operations, work will be scheduled to be completed within five years.

6 Vegetation Management (VM)

6.1 Vegetation to Conductor Clearance

GEC will meet the minimum standards for conductor clearances from vegetation to provide safety for the public and utility workers, reasonable service continuity, and fire prevention. As an operator of electric supply facilities, GEC's VM program will keep appropriate records to ensure that timely trimming is accomplished to maintain the designated clearances. These records will be made available for RUS O&M inspections upon request.

GEC conducts vegetation management activities within and adjacent to utility rights-of-way to maintain safe operating clearances, improve system reliability, facilitate access to facilities, and reduce wildfire risk.

Patrols are scheduled to ensure all lines are inspected for vegetation hazards. The results of the patrols are targeted areas for vegetation pruning or removal.

The following are optimal clearance dimensions or trimming operations

- **OH Distribution:** 15 feet from the conductor
- **Transmission ROW (defined width):** 40 feet between the conductor and the rooted tree stem. Defined width ROWs are generally found on cross-country corridors.
- **Trees Under Conductors:** Trees that are under conductors should have crowns reduced to a height 10 feet below the primary conductors or be removed.
- **Overhanging Branches:** Removed to a height of 20 feet above all distribution conductors and from conductor to sky on all transmission lines.
- **Secondary Conductor:** Trees near open wire secondary are pruned to provide a minimum of 10 feet of clearance.

6.2 Vegetation Trimming Standards

GEC personnel follow American National Standards Institute (ANSI) A300 concepts and utility directional pruning, which supports proper pruning/tree health while achieving and maximizing the pruning cycle. The VM program was developed with RUS, ANSI A300, ANSI C2, and NESC¹ requirements.

Work performed in accordance with the above guidelines provides reasonable service continuity and public safety and guards against wildfire damage caused by supply conductors.

Consideration is given to the impact of pruning on power line reliability, individual tree condition, and tree aesthetics. All work is conducted in a safe manner in accordance with the work rules set forth in OSHA 1910.269 and RUS's Technical Guidelines.

¹ Rules 012,013 and 218

6.3 VM Trimming and Inspection Schedule

GEC line crews may identify and address vegetation concerns during service calls, ongoing safety observations, and other field activities, in addition to our normal line patrol schedule. Proactive maintenance during routine operations and prompt action during emergencies maintain system reliability, support a safe work environment, and reduce wildfire risk. Scheduled patrols ensure all lines are inspected for vegetation hazards and systematically trimmed. Ongoing, year-round field patrols identify targeted areas for vegetation pruning or removal and ensure compliance with state and federal regulatory requirements. Table 6 outlines the VM inspection and maintenance schedule for GEC.

Table 6. Vegetation Management Maintenance Schedules

ASSET CLASSIFICATION	OPERATION TYPE	FREQUENCY
Transmission ROW	Inspection	Annual
	Maintenance	Annual as needed
Overhead Distribution ROW	Inspection	Every 5 years
	Maintenance	Every 5 years as needed
High Growth Rate Areas	Mid-cycle Trimming	As needed

6.4 Hazard Trees

A subset of Danger Trees², A Hazard Tree is defined as any tree or portion of a tree that is dead, rotten, decayed, or diseased and which may fall into or onto the overhead lines or trees leaning toward transmission and distribution facilities. These trees are sometimes located beyond the easement or ROW. Any tree located outside the ROW and deemed a hazard tree will be removed or topped to make it safe for conductors.

² As defined by ANSI 300 Part 7 standards

A hazard tree will have one or more of the following characteristics:

- Dead or dying - all dead or dying trees along, or outside the GEC right-of-way may be removed depending on the height of tree and the direction of the lean.
- Leaning trees - trees that have such a lean toward the right-of-way that they cannot be trimmed without removing the tops and slanting the tree back. Removal depends on height and direction of the lean.

7 Emergency Response

7.1 Preparedness and Response Planning

Grand Electric Cooperative maintains emergency planning procedures designed to minimize the impacts of disruptive events regardless of size or scope, including severe weather, wildfires, equipment failures, and other emergencies. The cooperative's Emergency Response Plan (ERP) provides guidance to ensure employee safety, maintain situational awareness, and restore service as quickly and safely as possible.

The ERP establishes communication protocols, defines employee roles and responsibilities, and outlines procedures for mobilizing personnel and resources during emergency events. During major incidents, Grand Electric coordinates with local emergency responders, neighboring utilities, and mutual aid organizations to support response and restoration efforts.

7.2 Emergency Management Communication and Coordination

In response to active emergencies, GEC coordinates and collaborates with the local Department of Emergency Management (DEM) and relevant state agencies as a peer partner. During such emergencies, GEC may provide a utility representative to the county and/or city DEM to ensure effective communication and coordination.

7.3 Jurisdictional Structure

GEC has considered the jurisdictional structure of the service area when developing or implementing its strategic plan, including those related to wildfires. Figure 5 (page 32) illustrates the general land ownership, while the various stakeholders with land management responsibilities within the service area are listed below.

GEC has assets in the following counties:

- Harding, SD
- Perkins, SD
- Butte, SD
- Meade, SD
- Corson, SD
- Ziebach, SD
- Carter, MT

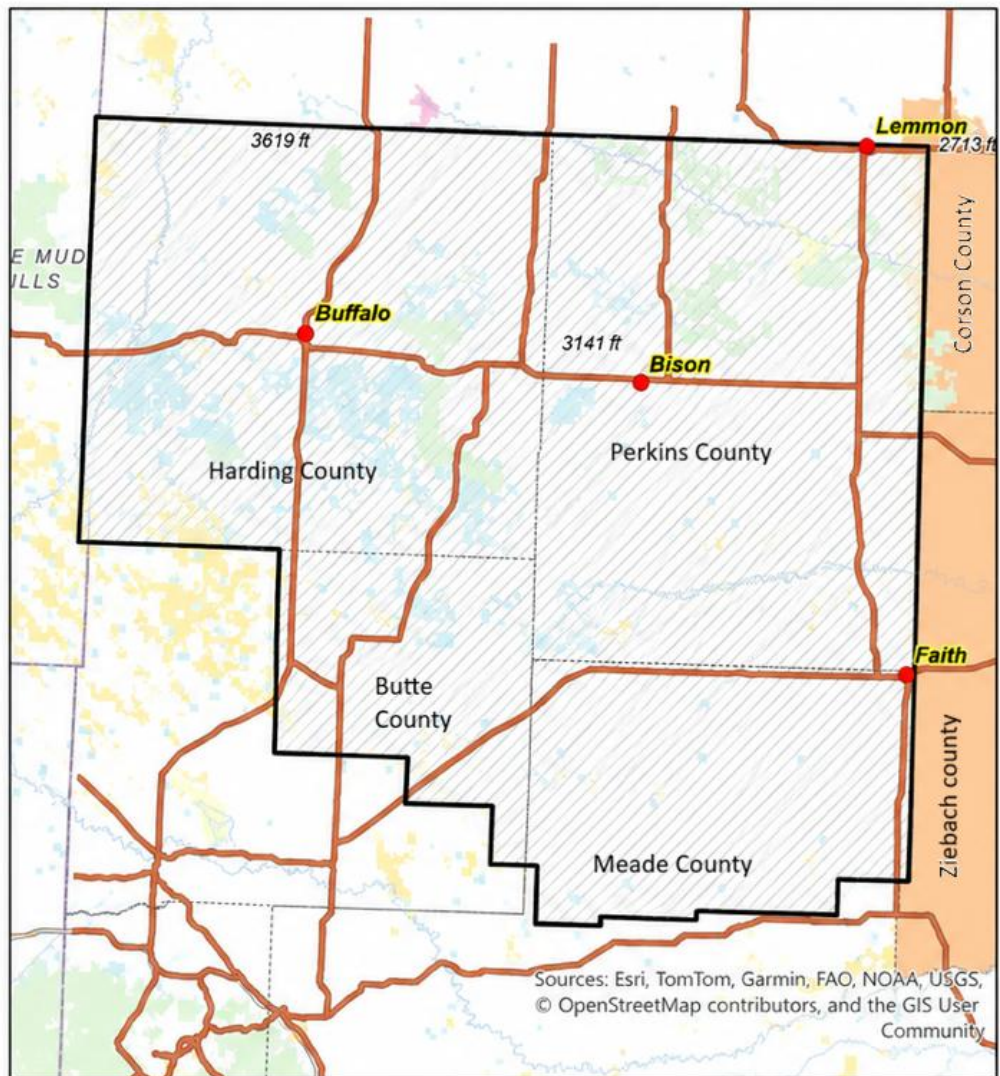
State Lands:

- South Dakota School and Public Lands
- South Dakota Game Fish and Parks

Federal Lands:

- US Forest Service – Grand River National Grasslands
- US Forest Service – Custer Gallatin National Forest
- US Fish and Wildlife Service
- Bureau of Land Management
- Bureau of Reclamation

Figure 5. General Land Ownership



General Land Ownership Map



7.4 Public Agency and Customer Communications for Outages

Grand Electric Cooperative is committed to providing timely and accurate communication before planned outages and during unplanned outages. For planned outages, the Cooperative provides members with at least 24 hours' notice whenever practical through its automated call and text notification system. Notifications include the reason for the outage, the anticipated start time, and the expected duration.

During unplanned outages, the same call and text system is used to notify affected members and provide restoration updates whenever practical. Grand Electric also uses social media to share outage information, estimated restoration times when available, safety reminders, and restoration progress.

When planned outages may affect critical infrastructure or a large number of members, Grand Electric makes reasonable efforts to notify external stakeholders including, but not limited to, other industry utility companies, county officials, and local emergency management agencies in advance. This coordinated approach helps keep members and community partners informed throughout outage events.

7.5 Community Outreach

Grand Electric Cooperative recognizes that public education is an important part of reducing wildfire risk throughout its service territory. The cooperative uses its monthly newsletter, Facebook page, website, and other member communications to share information on wildfire prevention, electrical safety, and emergency preparedness. Wildfire awareness and mitigation efforts are also discussed at the cooperative's annual meeting and other community events when appropriate.

Grand Electric Cooperative works to encourage members to take proactive steps to reduce wildfire hazards around their homes and property by maintaining defensible space, safely operating equipment during high fire danger, and reporting damaged electrical equipment or downed power lines. The cooperative also coordinates with local fire departments, emergency management agencies, and other public officials to promote wildfire awareness and preparedness.

Educational materials provided to members may include information on:

- National Weather Service fire weather alerts and Red Flag Warnings.
- Seasonal wildfire preparedness and fire prevention practices.
- Electrical safety around power lines and vegetation.
- Emergency preparedness and outage safety during wildfire events.
- Fire prevention practices for rural properties and areas where homes and rangeland interface.

By providing ongoing education and working with local partners, Grand Electric Cooperative helps members understand their role in reducing wildfire risk and protecting lives, property, and the reliability of the electric system.

7.6 Restoration of Service

If an outside emergency management/emergency response agency requests a power shutdown, or if GEC elects to de-energize segments of its system due to extreme weather, GEC staff will patrol the affected portions of the system before the system can be re-energized. Suspect equipment or distribution lines that cannot immediately be patrolled will remain de-energized until GEC staff can do so. Poles and structures damaged in a wildfire must be assessed and rebuilt as needed prior to re-energization. Periodic customer and media updates of restoration status prior to full restoration will be made.

7.6.1 Service Restoration Process

After a widespread outage, GEC work crews take the following steps before restoring electrical service after a de-energization event. These measures intend to protect the worker, members, the public, and the system's reliability.

- **Patrol:** Crews patrol the de-energized line(s) to ensure no hazards have affected the system during the outage. If an outage is due to wildfire or other natural disasters, as soon as it is deemed safe by the appropriate officials, crews inspect lines and equipment for damage, foreign contacts, and estimate materials and equipment needed for repair and restoration. Lines located in remote and rugged terrain with limited access may require additional time for inspection. GEC personnel assist in clearing downed trees and limbs as needed.
- **Isolate:** Isolate the outage and restore power to areas not affected.
- **Repair:** After the initial assessment, GEC staff develop the appropriate plan to implement the proper work for restoration. Rebuilding commences as soon as the affected areas become safe. Repair plans prioritize substations and transmission facilities, then distribution circuits serving the most critical infrastructure needs. While the goal is to reenergize all areas as soon as possible, emergency services, medical facilities, and utilities receive first consideration when resources are limited. Additional crew and equipment may be requested and are dispatched as necessary.
- **Restore:** Periodic customer and media updates of restoration status before full restoration are posted on social media platforms. After repairs are made, power is restored to homes and businesses as quickly as possible. Members, local news, and other agencies receive notification of restored electric service.

8 Performance Metrics and Monitoring

Grand Electric Cooperative continually develops performance metrics to monitor their efforts over time. The metrics provide a data-driven evaluation of performance to determine the Plan's effectiveness and identify areas for improvement. This section identifies Grand Electric Cooperative's management responsibilities for overseeing this Wildfire Mitigation Plan, including the operating departments and teams responsible for carrying out the various activities described in the previous chapters. This section also identifies the controllable metrics used to demonstrate compliance with this Wildfire Mitigation Plan.

8.1 Plan Accountability

The Board of Directors reviews and approves the Wildfire Mitigation Plan and any significant revisions as needed. The General Manager and Manager of Electric Operations are responsible for overseeing implementation of the plan and ensuring wildfire mitigation activities are carried out throughout the cooperative's service territory. The General Manager is responsible for communicating with members, local government officials, emergency management agencies, first responders, public safety organizations, and media outlets before, during, and after significant outage events. The General Manager and staff determine when and how outside agencies and the public are notified during wildfire-related incidents or other emergency situations to ensure timely, accurate, and coordinated communications.

Staff responsibility for plan implementation and general communications is described below:

- The Board of Directors makes policy decisions relative to the utility; they will be responsible for approving and adopting the Wildfire Mitigation Plan.
- The General Manager directs management staff responsible for operations, customer service, and finance.
- The Manager of Electric Operations is responsible for the overall execution of the WMP.
- The General Manager is responsible for transmitting communications to public safety, media outlets, public agencies, first responders, the local Office of Emergency Management, and health agencies during an emergency or planned maintenance outages.
- The General Manager determines when and how to notify outside agencies in the event of a wildfire emergency.
- GEC's Manager of Electric Operations will be responsible for monitoring and auditing the targets specified in the WMP to confirm that the objectives of the WMP are met, as well as the implementation of the plan in general.

8.2 Monitoring and Auditing of the WMP

The WMP will be reviewed at least once every two years and updated as needed to reflect knowledge gained since the previous review and modified accordingly. Updated versions will be

submitted to the Board of Directors for consideration and approval in accordance with Section 8.7.

8.2.1 Identifying Deficiencies in the WMP

The Manager will be responsible for ensuring that this WMP meets all public agency guidelines to mitigate the risk of its assets becoming the source or contributing factor of a wildfire. Staff responsible for assigned mitigation areas have the role of vetting current procedures and recommending changes or enhancements to build upon the strategies in the WMP. Either due to unforeseen circumstances, regulatory changes, emerging technologies, or other rationales, deficiencies within the WMP will be sought out and reported to the Board of Directors in the form of an updated WMP on an as-needed basis.

The Manager or their designee will be responsible for spearheading discussions on addressing any plan deficiencies and collaborating on solutions when updating the WMP. At any point in time when deficiencies are identified, the Supervisors or their delegates are responsible for suggesting the appropriate policy adjustments. GEC staff and qualified stakeholders are encouraged to bring any potential deficiencies to the attention of the Manager. The Manager, along with the appropriate staff, will evaluate each reported deficiency, and if determined to be valid, shall record the deficiency for further action.

8.3 Performance Metrics

GEC has developed performance metrics intended to gauge the effectiveness of its various programs and strategies for mitigating power-related ignitions (Table 7). The tracking of these metrics will help identify circuits most susceptible to unexpected outages, time-of-year risks, and the adequacy of the VM and asset inspection schedules. The metrics are also intended to assess the performance of different aspects of the plan.

Because this WMP is in the initial stage of implementation, relatively limited data is on hand. However, as results of the mitigation programs become evident and additional data is collected, GEC will identify areas of its operations that will require a different approach, as well as develop additional methods to eliminate GEC asset-sourced ignitions.

Table 7. Performance Metrics

METRIC	RATIONALE	INDICATOR	MEASURE OF EFFECTIVENESS
Field work-related ignitions	Demonstrates management of controllable ignition events	Count of events	Reduction or no material increase
Utility caused ignitions	Demonstrates the effectiveness of the plan	Count of events	Reduction or no material increase
Power line down during fire season	Assess system hardening efforts in critical areas	Count of events	Reduction in the general trend of events
Vegetation-caused Outage during fire season	Assess VM program work schedules/QC process	Count of events	Reduction or no material increase
Vegetation-caused ignition	Assess VM program work schedules/QC process	Count of events	Reduction or no material increase
Number of circuits operating under modified protection during fire weather	Demonstrates whether the utility is translating fire-weather awareness into operational action	Count of events	Reduction in ignition-related fault activity during fire weather

8.4 System Inspection QC Process

The Manager of Electric Operations manages the T&D line and substation assets and develops comprehensive inspection and maintenance programs. These programs ensure the safe operation of the T&D line and substation facilities.

Key imperatives are to:

- Reduce the risk of power-related wildfire.
- Meet federal and state regulatory requirements.
- Achieve reliability performance within mandated limits and to optimize capital and O&M investments.

Designated personnel regularly monitor inspection and corrective maintenance records and diagnostic test results to adjust maintenance plans and develop new programs. GEC makes all efforts to follow best industry practices in developing its maintenance programs.

GEC's Operations Department is responsible for performing the inspections and corrective maintenance. The priority for corrective maintenance is to remove safety hazards immediately and repair deficiencies according to the type of defect and severity of the risk level associated with the asset location. Work orders are monitored throughout the year to ensure timely completion via regular internal reports.

8.5 Vegetation Management QC Process

In-house operations personnel perform the vegetation management (VM) and clearing work for the cooperative. Quality control of VM activities is achieved through a structured review and audit process integrated into routine operations. Approximately 80 to 90 percent of distribution system VM work is reviewed in the field by the GEC staff and line crews during daily line patrols, inspections, and other system maintenance activities. These reviews assess compliance with established clearance specifications, trimming standards, and applicable utility procedures. GIS-based tools track the quality assurance work to monitor the vegetation management program's effectiveness.

8.6 Implementation and Improvement Costs

GEC implements most wildfire mitigation activities through existing inspection, vegetation management, maintenance, operations, emergency response, and capital improvement programs. These activities support wildfire risk reduction but are generally part of GEC's baseline utility operations and are not separately tracked as incremental WMP implementation costs.

At this time, GEC has not identified material incremental costs that are solely attributable to implementation of this WMP. Future wildfire-specific enhancements, system improvements, or upgrades may result in incremental costs if approved and implemented. Any such costs will be evaluated through GEC's normal budgeting, capital planning, and work-order processes.

8.7 Approval Process

In accordance with South Dakota Senate Bill 36, codified at South Dakota Codified Laws Chapter 49-49 (Wildfire Mitigation Plans), GEC shall submit an annual report to its Board of Directors detailing compliance with its approved Wildfire Mitigation Plan for the previous calendar year no later than June 1 of each year. The annual report will be made publicly available on GEC's website within 60 days of filing with the Board of Directors.

The Wildfire Mitigation Plan shall be submitted to the Board of Directors for review and approval and, upon approval, will be published on GEC's website. GEC shall review and update the

Wildfire Mitigation Plan at least once every two years and submit updated versions to the Board of Directors for consideration and approval.

GEC will maintain a valid and current Wildfire Mitigation Plan and will make reasonable efforts to substantially comply with the policies, programs, and procedures described within the Plan.

8.7.1 Board Presentation

GEC's WMP was developed by cooperative staff, with input from operations department personnel, and was reviewed by industry expert consultants and management prior to adoption. The Plan is presented to the Board of Directors for consideration and approval, following which it is adopted by formal board action. Upon adoption, the Plan is implemented by cooperative staff and made publicly available in accordance with applicable requirements.

Table 8. Version History

Date	Version	Author	Revision Description
09/2026	V1.0	GEC	Original document adopted in 2026

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Appendix A: Plan and Mapping Disclaimers

WILDFIRE MITIGATION PLAN DISCLAIMER

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Appendix B: SB-36 Cross Reference Table

SB-36	Guidelines Regarding Wildfire Mitigation Plans	Plan Section Number
SB-36, §2	A qualified utility that is an electric cooperative or a municipal utility may submit a wildfire mitigation plan to its approval authority for review and approval. The approval authority shall act upon a submitted wildfire mitigation plan within one hundred twenty days of submission. If approved, the electric cooperative or municipal utility must publish the wildfire mitigation plan on its website.	8.7
SB-36, §3	The electric cooperative or municipal utility shall publish the report on its website within sixty days of filing with the approval authority. The wildfire mitigation plan is valid and current if it is on file and all annual reports are timely filed with the commission or approval authority. The qualified utility shall file an update to the wildfire mitigation plan at least once every two years.	8.7
SB-36, §4	A wildfire mitigation plan under this section must include:	
SB-36, §4(1)	A description of areas within the service territory or facility locations of the qualified utility which may be subject to a heightened risk of wildfire.	2.3, 2.4, 2.5, 2.5.1
SB-36, §4(2)	A description of the procedures or strategies, standards, and time frames that the qualified utility will use to inspect and operate its infrastructure.	5
SB-36, §4(3)	A description of the procedures or strategies and standards that the qualified utility will use to perform vegetation management.	6
SB-36, §4(4)	A description of the procedures or strategies for modifications or upgrades to electric facilities and preventative programs to reduce the risk of its electric facilities initiating a wildfire.	1.6, 3, 4

SB-36, §4(5)	A description of considerations or strategies for de-energizing power lines or modifying electric facility operations to mitigate potential wildfires, taking into consideration:	3.1, 3.2
SB-36, §4(5)(a)	The ability of the qualified utility to reasonably access the proposed power line to be de-energized.	3.1
SB-36, §4(5)(b)	The balance of the risk of wildfire with the need for continued supply of electricity to a community.	3.1
SB-36, §4(5)(c)	Any potential impact to public safety and first responders, as applicable.	3.1
SB-36, §4(6)	A description of the procedures or strategies the qualified utility intends to use to restore its electrical system in the event of a wildfire.	7.6, 7.6.1
SB-36, §4(7)	A description of the estimated incremental costs, if any, for implementation of the plan, including system improvements and upgrades.	8.6
SB-36, §4(8)	A description of community outreach and public awareness efforts before and during a wildfire season.	7.5
SB-36, §4(9)	A description of coordination with applicable state or local wildfire agencies.	7.2