



Southeastern
Electric Cooperative, Inc.

A Touchstone Energy® Cooperative 

WILDFIRE MITIGATION PLAN

**SOUTH DAKOTA
STATE**

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1 Introduction/Executive Summary

Wildfire mitigation plays an essential role in Southeastern Electric Cooperative's (SEC) safety and operational practices. SEC has adopted this wildfire mitigation program to help balance its responsibility to provide reliable electric service with its responsibility to help manage wildfire risk. The program responds to changes in environmental conditions and evaluates industry trends and technologies to further mitigate the potential for ignitions and more effectively respond to wildfire risk conditions.

South Dakota Senate Bill 36, signed by Governor Rhoden in March 2026, authorizes qualified electric utilities operating in South Dakota to develop, adopt, and implement a comprehensive wildfire mitigation plan (WMP). Pursuant to South Dakota Law, a WMP must include strategies for inspecting and operating electric infrastructure, performing vegetation management, upgrading facilities where appropriate, and coordinating with emergency response agencies. SEC's WMP serves as a framework to identify wildfire-related risks, guide mitigation priorities, support consistent operational decision-making, and demonstrate the Cooperative's commitment to prudent wildfire risk management and the continuous improvement thereof.

1.1 Purpose of the WMP

SEC's WMP sets forth strategies, programs, and procedures to mitigate the threat of an electrical equipment-ignited wildfire and addresses the unique features of its service territory, such as topography, weather, infrastructure, grid configuration, and areas most prone to wildfire risk. This includes the inspection and maintenance of its distribution assets, as well as the management of vegetation within public right-of-way or private easements containing those assets.

SEC's Board of Directors approves the WMP, while SEC's Vice President of Operations and Engineering is responsible for its implementation. The primary accountability for plan implementation resides with SEC's Chief Executive Officer.

1.2 Objectives of the WMP

The primary objective of this WMP is to establish a practical framework that enhances safety and system reliability while reducing the likelihood that SEC's infrastructure may cause or contribute to the ignition of a wildfire. Mitigation measures and strategies established in SEC's WMP are intended to align with applicable South Dakota law and the National Electrical Safety Code (NESC), while also reflecting prudent utility practices and consideration of available technologies that may reduce both outage risk and ignition potential.

A secondary objective of this WMP is to evaluate the effectiveness of SEC's wildfire mitigation strategies through annual review and revision when necessary. If a particular program component or protocol is found to be unnecessary, ineffective, or in need of improvement, SEC will assess whether it should be modified, replaced, or discontinued.

1.3 Utility Profile and History

SEC is a South Dakota rural electric cooperative formed pursuant to SDCL ch. 47-21 which serves approximately 21,000 member-consumers in southeastern South Dakota. SEC was founded in 2000 as a result of the consolidation of the Lincoln-Union and Turner-Hutchinson Cooperatives. Thereafter, McCook Electric Cooperative merged into SEC in 2006. SEC is governed by a board of nine directors that are elected by the Cooperative's membership at the Cooperative's annual membership meeting held in June of each year.

1.4 The Service Area

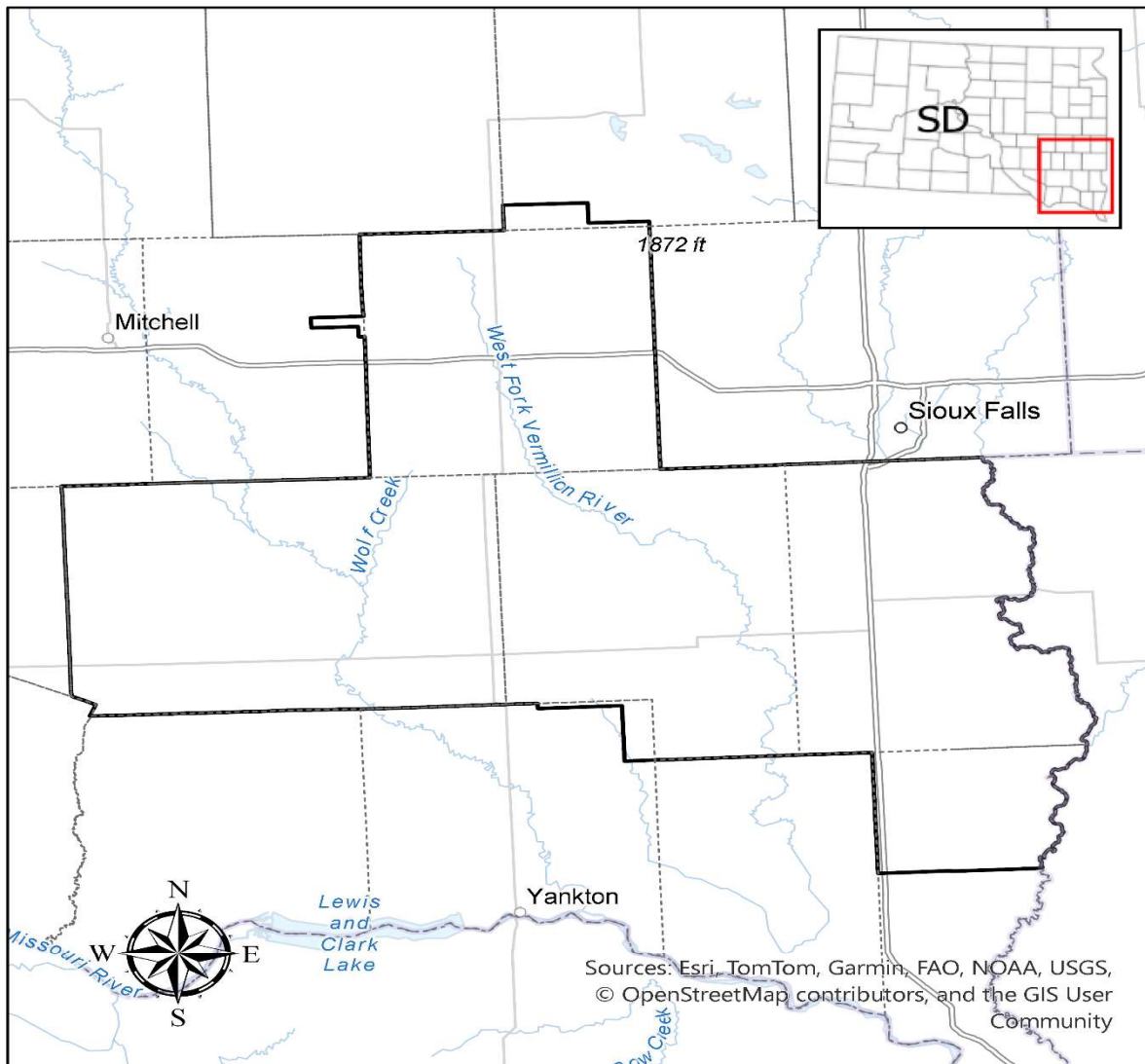
SEC's service territory, shown in Figure 1, includes portions of Clay, Hanson, Hutchinson, Lake, Lincoln, McCook, Minnehaha, Turner, Union, and Yankton Counties. In addition to providing electric service to the rural communities of Davis, Farmer, Irene, Hurley, Montrose, Spencer, and Viborg, SEC also serves urban growth on the outskirts of the municipalities of Harrisburg, Sioux Falls, and Tea. The balance of SEC's service territory is largely rural in nature.

SEC's service territory ranges in elevation approximately 1,200 to 1,700 feet above sea level. The average annual precipitation is 28 inches, but this average precipitation has ranged from 10 inches to 39 inches annually based on the National Weather Service records. Temperatures vary widely with extremes ranging from minus 40 degrees to 110 degrees Fahrenheit. The average winter low temperature is 7 degrees with a high temperature of 26 degrees. The average summer high temperature is 85 degrees.

Various types of vegetation exist within SEC's service territory. Grasses consist of native and cultivated types. Most of the trees are deciduous with some evergreen varieties. Most trees have been planted, except for volunteer trees along streams and river bottoms. Surface water levels are often minimal in the summer months, with some streams having very low flow or dry.

As it pertains to land use, SEC's service territory is predominantly rural farmland used for row crops, livestock pasture, hay, residential acreages, and value-added agriculture businesses. The next largest portion of the territory is urban developments used for residential, light commercial, industrial, and public activities. A very small portion of the service territory is covered by timber and is generally confined to the river bottoms associated with the Big Sioux, James, and Vermillion Rivers and their respective tributaries.

Figure 1. Service Area



Service Area Map

— Service Boundary
--- Counties

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1.5 Utility Infrastructure Overview

SEC's headquarters is located near Lennox, SD. SEC also maintains operation centers in Alcester, Marion, Parkston, Salem, and Viborg, SD. All six locations include a warehouse and pole yard.

SEC's distribution system includes approximately 4,650 miles of powerline operated at 12,470/7,200 Volts. Approximately 43.4% of the powerline is constructed overhead and the remaining 56.6% is underground.

SEC receives its power from 33 substations which are owned, operated, and maintained by its wholesale electric power provider East River Electric Power Cooperative (East River).

SEC does not have any transmission facilities. See Table 1 for a detailed description of the Cooperative's infrastructure.

Table 1. Infrastructure Overview

INFRASTRUCTURE CLASSIFICATION	INFRASTRUCTURE DESCRIPTION
Distribution Line Infrastructure	Approximately 2,018 miles of overhead (OH) and 2,632 miles of underground (UG) conductor, cabling, transformers, voltage regulators, reactors, switches, line protective devices operating at or below 12.5kV.
Substation Infrastructure	Low-side equipment such as protective devices, relays, and switchgear in all 33 East River substations. Control houses in 3 of 33 substations.

1.6 Overview of Utility's Fire Prevention Strategies

This WMP incorporates SEC's existing operations plans, asset management, and engineering principles, which are 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 SEC's five mitigation components with associated programs and activities that support SEC's ongoing commitment to wildfire mitigation.

Table 2. Mitigation Strategies/Activities

DESIGN AND CONSTRUCTION
Covered jumpers and animal guards
Avian protection construction standards
Protection coordination – sectionalizing studies
Hydraulic recloser replacement program
INSPECTION AND MAINTENANCE
Wood pole intrusive inspection and testing
Distribution system powerline patrols
Underground equipment inspection
Ground rod testing
Distribution system vegetation management program
Oil (hydraulic) circuit recloser maintenance program
Infrared inspections of substation equipment
Thermal imaging cameras
Voltage regulator inspection program
OPERATIONAL PRACTICES
Work procedures and Fire Hazard training for people working in locations with elevated fire risk conditions
Vehicle and ATV traffic restricted to established roads during red flag warnings, except in the case of emergency
Fire suppression equipment such as fire extinguisher and hand tools on worksite during red flag warning
Provide liaison to county offices of emergency services (OES) during fire event
SITUATIONAL AWARENESS
Weather Monitoring in the service area
RESPONSE AND RECOVERY

Powerline patrols before re-energization after a protective device lockout during a red flag warning

Emergency Restoration Plan

Pre-emptive de-energization protocols

Coordination with local Department of Emergency Management

2 Risk Analysis and Risk Drivers

SEC assesses the key risk drivers (RD) tied to its utility facilities. By identifying the primary drivers of risk, the Cooperative 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 arises from powerlines coming into contact with foreign objects (e.g., trees, vehicles, or structures), installing more resilient conductors can effectively mitigate that specific hazard. Such an approach ensures mitigation efforts are tailored to the root causes of each risk rather than applied generically.

2.1 Fire Risk Drivers Related to Construction and Operations

The following design, construction, and operational risks were identified by SEC based on its industry knowledge and experience. Each of these risks might result in sparks, arcs, or hot molten metal being emitted.

- Foreign contact. Overhead electric powerlines typically use bare conductors supported by insulators. The benefits include lighter and more cost-effective systems to distribute power. However, bare conductors are more susceptible to contact from foreign objects such as wildlife, vegetation, or third-party equipment. System protective devices are coordinated to isolate faults from foreign contact, but these protective devices cannot operate fast enough to completely prevent potential ignition sources.
- Vehicle or equipment accidents. Powerlines and equipment are normally located in or near public roads, and are therefore subject to being damaged by a motor vehicle.
- Equipment failure. Equipment malfunction can occur during its service life for many reasons. Even though SEC performs routine inspections and maintenance, internal defects not visible or other failures not predictable might result in equipment failure.
- Expulsion fuse operation. The utility industry commonly uses expulsion type fuses as protective devices. Expulsion fuses utilize a tin or silver link element in an arc-tube that vents gas and potentially molten metal to extinguish a faulted condition.

- Phase to phase conductor contact. High wind events, freezing rain, and motor vehicle accidents are several potential causes of phase-to-phase conductor contact. When conductors of different phases contact each other, a fault condition may be created.
- Underground cable dig-in. Excavation work done by property owners, or third-party contractors, without following South Dakota's 811 underground cable locating laws may create a situation in which the Cooperative is unaware of the work taking place and might result in arcing.

2.2 Fire Risk Drivers Related to the Service Area

The following topography and climate conditions are additional wildfire risks within SEC's service territory.

- Drought
- High winds
- Lightning
- Abundant fuel (vegetation)
- Wildland Urban Interface

2.3 Key Risk Impacts

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

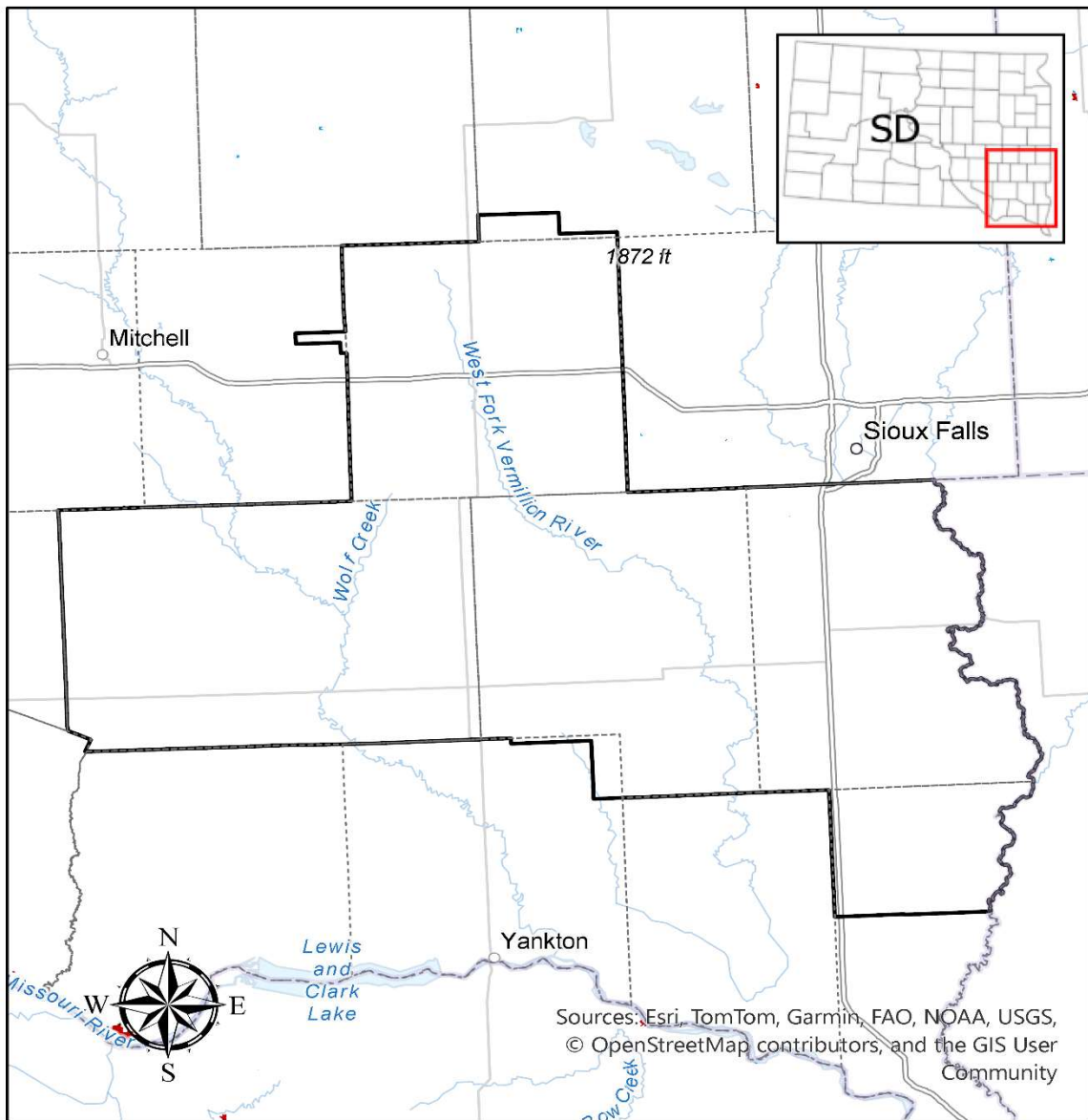
- Personal injuries or fatalities to the public, employees and contractors
- Damage to public and/or private property
- Damage and loss of SEC owned infrastructure
- Adverse impact upon distribution reliability and operations
- Third party damage claims and resulting litigation costs, as well as fines from governing bodies
- Reputational damage and resulting loss of public confidence

2.4 Wildfire History and Outlook

Past wildfire investigations demonstrate that most wildfires in this region are caused by people. Common ignition sources include debris burning, motor vehicles, mismanagement of intentional fires, welding or cutting activities in dry vegetation, and equipment failures. While the wildfire season typically runs from April 1st to October 31st, wildfire activity generally subsides once grasses green up in late spring. The timing of green up varies annually depending on soil moisture and temperature conditions.

Figure 2 shows that there have been no historic wildfires in and around SEC's service territory since 2000.

Figure 2. Historic Wildfire Perimeters 2000-2024



Historic Wildfire Perimeter Map

- Service Boundary
- 2000-2009
- 2010-2019
- 2020-2025
- - - Counties



2.5 Wildland Urban Interface

The USDA Forest Service defines 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 concepts 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% of wildlands. To be considered an "interface" land area, development or structures must be bordered by wildlands on at least one side.

Intermix WUI

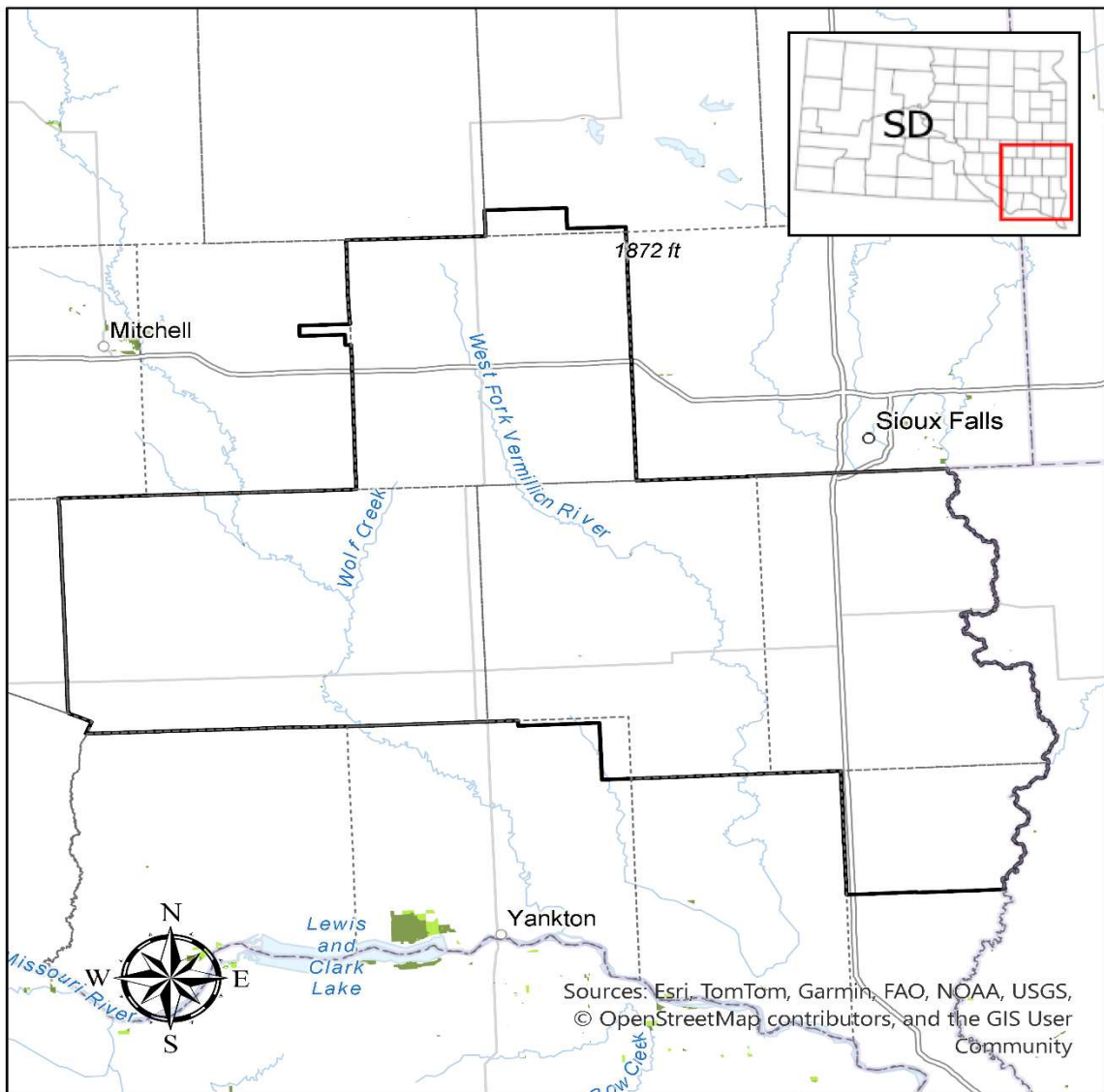
Intermix refers to areas where housing and wildland vegetation intermingle. To be considered intermix, a development or structure must be surrounded on two or more sides by wildlands. Intermix is often found between the Interface and the wildlands.

Wildlands

For the purposes of this map, "wildlands" are defined as any area without any structures or human development that also contain 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 shows there are no areas of WUI within SEC's service territory.

Figure 3. Wildland Urban Interface



Wildland Urban Interface Map

- Service Boundary
- Interface
- Intermix
- - - Counties

2.6 Wildfire Threat Assessment Mapping

The Wildfire Hazard Potential (WHP) map used in this WMP 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

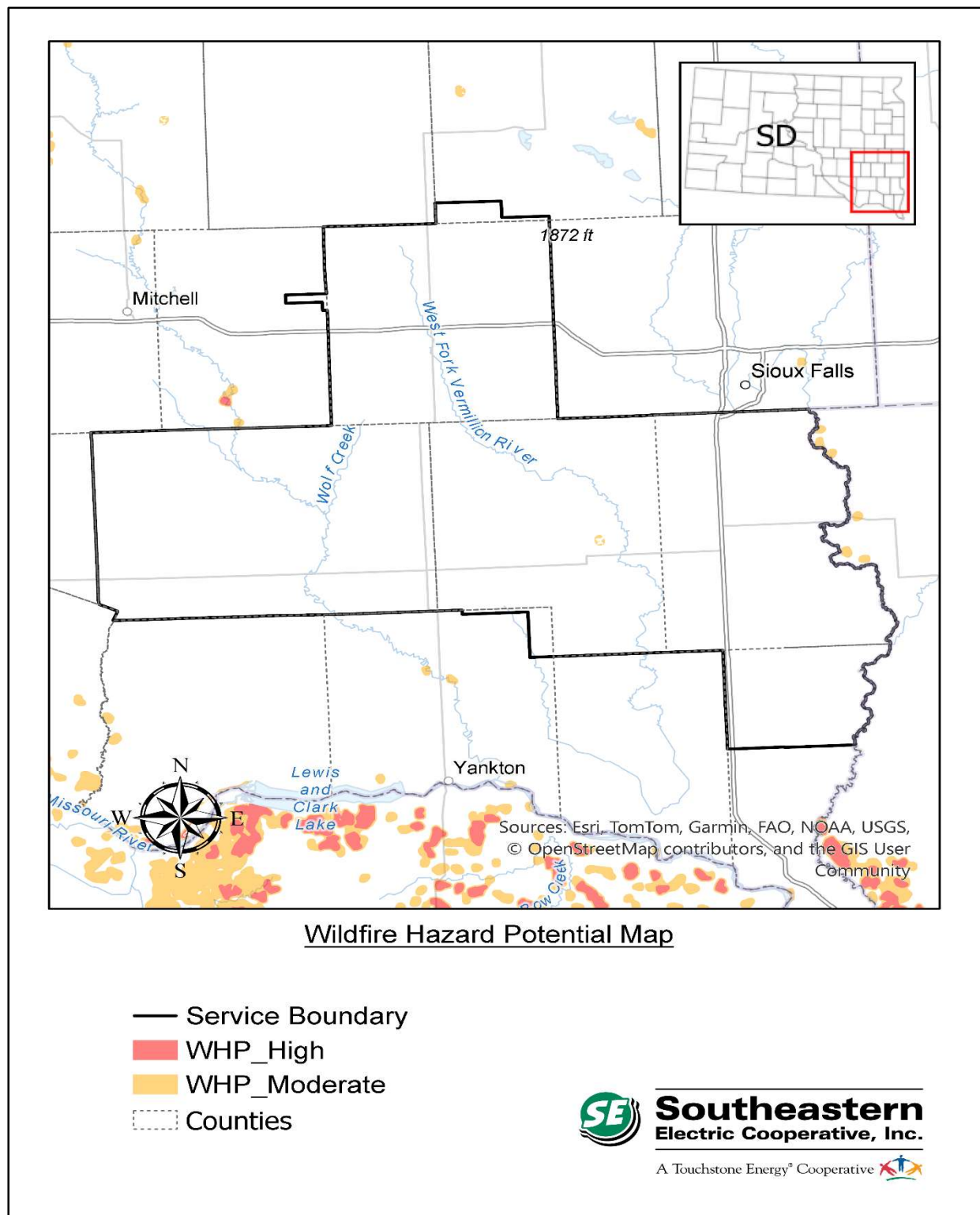
Areas mapped with higher WHP values represent fuels with a higher probability of experiencing torching, crowning, and other extreme fire behavior under conducive weather conditions. An essential aspect of the WHP method is the use of "resistance to control weights" at the end of the mapping process. 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 identify where fuel reduction treatments and mitigations might be most needed.

Standing alone, the 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 infrastructure. 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 and future sectionalizing studies and associated remedial actions.

Figure 4 shows that SEC's service territory does not include any areas categorized as high risk, and only a few hundred acres categorized as moderate risk.

Figure 4. Service Territory WHP Overview



2.6.1 Infrastructure Within Wildfire Threat Index Tiers

Table 3 provides a high-level overview of SEC's various infrastructure relative to the Wildfire Hazard Potential tiers shown in the WHP map above (Figure 4).

Table 3. Overview of Distribution Infrastructures within WHP Tiers

Infrastructure	Total	Moderate		High	
	Line-miles	Line-miles	%	Line-miles	%
12.47 kV OH Distribution	1930.22	1.1	.06	0	0
12.47 kV UG Distribution	2572.79	0.66	.03	0	0
Totals	4503.01	1.76	.04	0	0
Total Substations	33	0	0	0	0

3 Operational Practices

This chapter describes the operational practices, preventive strategies, and programs implemented, to reduce the risk of wildfire ignition associated with SEC's electric facilities. These measures focus on minimizing ignition potential under elevated fire-risk conditions while maintaining system safety and reliability.

Table 4. Activities That Address Wildfire Risk Factors

RISK FACTOR	MITIGATION ACTIVITY
Fuel Source	• Vegetation management program • Selective use of non-expulsion fuses • Enhanced tree removal efforts
Extreme Weather	• National weather service monitoring • Limit vehicle/ATV traffic to established roads
Contact with Foreign Objects	• Utilize 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 • Annual distribution line routine patrols • Infrared inspections of substation equipment • Wood pole test and treatment program
Field Work	• SEC worker/contractor education on fire ignition sources • Tailgate meetings before fieldwork

3.1 De-energization – Public Safety Power Shutoff

Public Safety Power Shutoffs (PSPS) are a recent development in the strategies used by electric utilities to help mitigate wildfire risk. A PSPS preemptively de-energizes power lines during extreme weather conditions. SEC, in consultation with local emergency managers, will evaluate the need for a PSPS along with the impacts on fire response, water supply, public safety, and emergency communications.

SEC considers the external risks and potential consequences of a PSPS while striving to meet its main priority of protecting the communities and members it serves. If conditions indicate that a

wildfire threat is imminent, SEC personnel have the authority to de-energize select distribution circuits. This decision is based on multiple factors accompanied by SEC's unique understanding of its distribution system. No single factor is determinative. External Risk factors that may initiate a PSPS include:

- Imminent fire danger
- Critically dry vegetation coupled with high winds
- NWS red flag warning
- Mandatory fire orders in effect (as directed by any Agency Incident Commander)
- Field observations by SEC or other emergency management staff
- An active wildfire in the area

The potential consequences of initiating a PSPS 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 heat or air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities.
- Traffic congestion resulting from the public evacuation in de-energized areas can lengthen response times for emergency responders.
- 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.

The risks and potential consequences of initiating a PSPS are significant and extremely complex. Based on the above considerations, SEC will make the determination to implement a PSPS on a case-by-case basis after carefully considering all known facts at the time the decision is made. While SEC 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 tool of last resort, as well as another mitigation option in the face of a potential crisis.

SEC will monitor the evolution of PSPS implementation by other regional electric utilities to continue to refine its evaluation of this wildfire mitigation strategy.

Relative to wildfire mitigation, SEC crews will take the following steps before restoring electrical service after a PSPS event. These steps are intended to protect SEC personnel, SEC members, the general public, and the distribution system.

- **Patrol:** Crews patrol every de-energized powerline to inspect for any damage or unsafe condition.
- **Isolate:** Crews isolate any damage.
- **Repair:** SEC evaluates the needed repair work. Rebuilding commences as soon as the affected areas become safe and conditions allow.
- **Restore:** Service is restored as sections of the system are patrolled or repaired if needed. Press releases and communication occur as needed to keep stakeholders informed.

3.2 Situational Awareness

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

SEC relies on various resources to monitor developing weather conditions that may lead to fire events. Sources for such information may include but are not limited to the following:

- **USFS-Wildland Fire Assessment System (WFAS):** For immediate and short-term situational awareness, mapping tools from the USFS-WFAS help determine daily and short-term forecasted risk, with daily or weekly fire weather status maps produced as needed to assess PNW wildfire conditions. (<https://www.wfas.net/index.php/fire-danger-rating-fire-potential--danger-32/fire-danger-subsets-fire-potential--danger-55>)
- **The National Weather Service (NWS):** The NWS provide 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.wrh.noaa.gov/map/?wfo=psr>)

3.3 Red Flag Warning (RFW) Operational Protocols

RFWs are issued by the NWS when critical fire weather conditions are forecast or met. RFW's are intended to bring attention to limited weather conditions of importance that may result in extreme wildfire risk. The type of weather patterns that may cause an RFW include low relative humidity, strong winds, dry fuels, the possibility of lightning strikes, or any combination of the above. An RFW may be issued during an on-going event, or if the fire-

weather forecast contains a heightened degree of confidence that such Red Flag criteria will occur within 24 hours.

SEC monitors Red Flag Warnings as part of its situational awareness and operational decision-making processes and uses these warnings to heighten preparedness, reinforce safe work practices, and, as appropriate, implement operational measures intended to reduce wildfire ignition risk while maintaining system safety and reliability.

When SEC receives notice that an RFW has been issued, the following protocols are to be observed. Work done by SEC personnel in areas where conditions are highly favorable for fires to start, spread rapidly, or become uncontrollable, are to be performed by such personnel as follows:

- Based upon the specific conditions present on site, there appears to be a higher risk for a fire to start if the work is not performed at that time;
- Work activities are under the direct supervision of the crew foreman or lead lineman;
- The work crew is able to maintain adequate communications with the operations center;
- It appears likely that work crews would be able to extinguish a fire resulting from the work being performed, despite weather conditions, terrain, and surrounding vegetation;
- The work crew has portable fire extinguishers accessible in the immediate area of work to respond immediately in the event of an ignition; and
- The work crews, foreman, or site lead will be on alert for fires while working or passing through high risk areas and immediately report fires or signs of fire to the operations center as soon as feasible.

4 Fire Mitigation Construction

SEC has adopted several construction methods to reduce the risk of its electric infrastructure igniting a wildfire. These include:

- Strategic undergrounding of distribution powerlines
- Rebuilding aging overhead powerlines
- Installation of arresters, insulated jumpers and wildlife guards
- Replacing hydraulic reclosers with vacuum, solid dielectric, and SF6 insulated devices
- Updated protection coordination based on sectionalizing studies
- Use of non-expulsion fuses in select high-risk areas

4.1 Emerging Technologies

SEC will review new and emerging technologies as those technologies become available and will consider the use of pilot projects to test the effectiveness of those technologies on its distribution system.

4.2 Avian Protection Program

SEC employs design and construction standards to protect raptors, migratory birds, and other wildlife. These standards have been shown to reduce the collision and electrocution risks and the number of birds injured. Consequently, avian protection strategies 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' crossarms to achieve 60" of phase separation
- Perch deterrents on 8' crossarms
- Covered wire for jumpers and stingers
- Caps on surge arresters, energized bushings, and terminators
- Bushing covers on transformers, capacitors, reclosers, and regulators

While not installed at every structure, the construction specifications listed above are used on all new construction. 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 an automatic, high-voltage electric overcurrent protective device. Like a circuit breaker in a household electric panel, this class of protective device is designed to shut off electric power when trouble occurs, such as a short circuit, then close back in multiple times to detect if the fault still exists. If the fault is temporary, the unit automatically resets and restores power¹.

All new reclosers, for both overhead and underground lines, have electronic controls and use either vacuum, SF6 or solid-dielectric insulating materials. The replacement of hydraulic reclosers with electronic controlled units allows SEC to improve its system protection.

4.4 Aging Overhead Replacement Program

SEC has made efforts to identify, locate, and replace aging overhead conductors still in use on its distribution system. When planning overhead conductor replacement projects, the priority is to upgrade circuits with higher customer density, with additional consideration given to areas with elevated wildfire risk.

¹ <https://www.eaton.com/content/dam/eaton/products/medium-voltage-power-distribution-control-systems/reclosers/recloser-definition-information-td280027en.pdf>

4.5 System Monitoring – SCADA

SEC has retrofit substation breakers and some downline protective equipment with supervisory control and data acquisition (SCADA) functionality to monitor circuit conditions. This provides SEC with early notification of system abnormalities and allows for a faster response.

5 Infrastructure Inspections and Maintenance

SEC maintains a formal inspection and maintenance program for its distribution lines and substation equipment, which plays an essential role in the prevention of wildfire. SEC currently patrols its system regularly. 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
Overhead Distribution	Detailed Inspection	Annually
	Intrusive Pole Inspection	Every 10 years
Underground	Routine Inspection	Varies
	Detailed Inspection	Every 10 years
Substation Equipment	Routine Inspection	Annually
	Detailed Inspection	Every 5 years
	Infrared Inspection	Annually

5.1 Definition of Inspection Levels

1. **Routine Inspection:** A simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Routine inspections may be carried out in the course of other SEC business.
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. Chemical treatments are applied as needed.
4. **Infrared Inspection:** Inspections involving the use of a thermal imaging camera to detect abnormal surface temperatures and hidden defects in electrical components without physical contact.

5.2 Routine Inspections

Each year, SEC inspects all of its substation equipment and collects the data using Google forms. Data collected during the inspection is used to create the service orders needed to correct any noted deficiency, as well as identify circuits experiencing high incidents of fault interrupting events, and load imbalances. The following is a short list of items to check will performing inspections:

- Physical damage and deterioration of facilities
- Operation count of each breaker or sectionalizing device
- Amp readings for each phase of each distribution circuit

5.3 Detailed Inspections

Each year, SEC inspects all its overhead powerlines, and approximately 10 percent of its underground powerlines and collects data using the National Information Solutions Cooperative (NISC) maintenance and inspection module. Data collected during such inspection is used to create service orders needed to correct any noted deficiency. The following is a short list of items to check will performing inspections:

- Low clearance of primary conductor, secondary wires, and service drops
- Unauthorized attachments

- Excessive splicing
- Slack guys
- Broken insulators
- Encroachments
- Physical damage and deterioration of facilities
- Improper clearance from trees and other vegetation

5.4 Intrusive Pole Inspection

SEC's service territory is generally located in Zones 2&3 of the Decay Severity Zone for wood poles as defined by RUS Bulletin 1730B-121. Wood poles in these zones should be reinspected for decay every 10 years. Accordingly, SEC inspects 10 percent of its distribution system poles each year.

Such an inspection includes a comprehensive review of the pole's condition below and above the groundline. To perform below ground inspections, the poles are excavated to a depth of approximately 6-18 inches. All poles that aren't able to be excavated are inspected using bore holes. After having all decay on the poles removed, all excavated poles found to have less than 67 percent of their original strength are classified as rejects. After having all decay removed, poles that are found to have less than 13 percent of their original strength, or less than 50 percent of their original circumference are considered priority reject poles.

The condition of the pole above the groundline is also inspected to determine if there is any mechanical damage, wildlife damage, external decay, or weathering that may compromise the strength of the pole. Depending on the severity of any of these conditions, the pole may be classified as a reject.

The pole inspection program also confirms that all poles, pole-top assemblies and attachment points are in good condition, and that guy wires are tight. Any deficiencies observed during inspection are corrected as soon as feasible.

All poles identified as rejects are scheduled for replacement within six months. All priority reject poles are scheduled to be replaced as soon as feasible.

5.5 Infrared Inspections

SEC performs infrared inspections of its substation equipment on an annual basis. Such an inspection includes scanning all SEC owned equipment, hardware, and connections to identify any abnormal surface temperatures. These abnormal temperatures (normally higher than surrounding equipment) generally indicate a problem that needs to be investigated in greater detail. This method allows the equipment to remain energized and in service while the inspection is completed, therefore avoiding unnecessary outages or switching events.

In addition to avoiding switching events that have the potential to create arcs in areas subject to a high risk of fire, such an inspection can identify loose or corroded connections and unbalanced loads that also have the potential to be a fire hazard.

5.6 Prioritization of Repairs

SEC 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 negatively impact the system's integrity or the safety of personnel 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 personnel or the general public. Priority #1 tags 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 tags 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, correction of the deficiency will occur within 2 months.

Priority # 3 – Non-emergency repair condition: Conditions that do not present a situation that could jeopardize the safety of the system, personnel and the general public. Priority #3 tags will be submitted by the inspector with the time interval recommended. In the judgment of the Operations and Engineering Department, work will be scheduled to be completed within five years.

6 Vegetation Management (VM)

SEC uses a combination of its own personnel and independent contractors to complete its vegetation management program. SEC's vegetation management independent contractors have access to SEC's inspection database so any deficiencies concerning trees and other vegetation that have been noted during the annual powerline inspections are forwarded to those contractors automatically. The information such contractors are provided includes map locations and the extent of the work to be completed.

SEC's vegetation management contractors are also provided access to SEC's contractor map so contractors may pinpoint the location of all needed work.

When SEC identifies a site where vegetation is in direct contact with an overhead line, its crews are dispatched immediately to correct the situation.

6.1 Vegetation to Conductor Clearance

SEC 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, SEC's VM program will keep appropriate records to ensure that timely trimming is accomplished to maintain the designated clearances.

SEC has a responsibility and is required by state and federal agencies to maintain the right of way under or around its power lines. To lessen the probability of a fire and safety hazard due to live, dead or leaning trees and vegetation, SEC personnel and independent contractors engage in an ongoing effort to clear any such hazard by removing trees or vegetation that is located directly under the power line and considered a problem. Trees or vegetation that are encroaching on the powerline, but not directly located under the powerline, shall be trimmed or removed as needed.

All powerlines are inspected for vegetation hazards annually as part of SEC's powerline inspection process.

During vegetation clearing, contractors aim to achieve a minimum of 10 feet of clearance (unless otherwise directed by SEC VM staff) and all overhanging limbs are removed. All limbs within 3 feet of a secondary wire are removed. The contractor also clears vegetation from SEC's service drops and pole climbing space on an as needed basis.

The following are optimal clearance dimensions or trimming operations:

- **OH Distribution:** 10 feet from the conductor
- **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 10 feet above all distribution conductors.
- **Secondary Conductor:** Trees near open wire secondary are pruned to provide a minimum of 3 feet of clearance.
- **Service Wire:** Branches that deflect or weigh heavily upon service or other secondary wires beyond the last SEC pole are removed, but not pruned in their entirety without specific direction by SEC operations.
- **Pole Base:** A 4 foot radius area around the base of all poles is cleared of vegetation that would prevent the pole from being safely accessed and climbed.

6.2 Vegetation Trimming Standards

SEC's independent contractors 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 NESC² requirements.

Work performed in accordance with the above referenced guidelines results in reasonable service continuity, public safety, and safeguards against wildfire damage caused by supply conductors. Consideration is given to the impact of pruning on powerline 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 SEC's Technical Guidelines.

7 Emergency Response

7.1 Preparedness and Response Planning

SEC maintains an Emergency Restoration Plan (ERP) that is designed to ensure:

- The existence of ongoing operations and maintenance programs;
- The performance of a system security Vulnerability and Risk Assessment (VRA);
- Establishing and maintaining an Emergency Restoration Plan; and
- Maintaining the physical, cyber and electrical condition and security of SEC's electric system and for the quality of services provided to its membership.

The ERP has been prepared in accordance with RUS Bulletin 1730B-2 and is designed to meet SEC's fiduciary responsibility to its member-consumers that demands prudent business practices. An ERP can help minimize the financial losses stemming from a disaster, allowing the resumption of normal billing and other essential record-keeping that fulfill that fiduciary responsibility.

² Rules 012,013 and 218

The ERP establishes a recovery team, each employee's responsibilities and training requirements, and provides guidance when dealing with disaster situations such as a wildfire.

7.2 Emergency Management Communication and Coordination

In response to active emergencies, SEC coordinates and collaborates with municipal, county, and state departments of emergency management (DEM) as a peer partner. During such emergencies, SEC sends a representative to the DEMs to ensure effective communication and coordination.

In addition to the DEM offices, SEC also coordinates with the South Dakota Rural Electric Association (SDREA) in order to expedite obtaining mutual aid and material support during large scale recovery efforts.

7.3 Jurisdictional Structure

SEC has considered the jurisdictional structure of its service area when developing or implementing its strategic plan, including those related to wildfires. Figure 5 illustrates general land ownership. The stakeholders with land management responsibilities within SEC's service area are listed below.

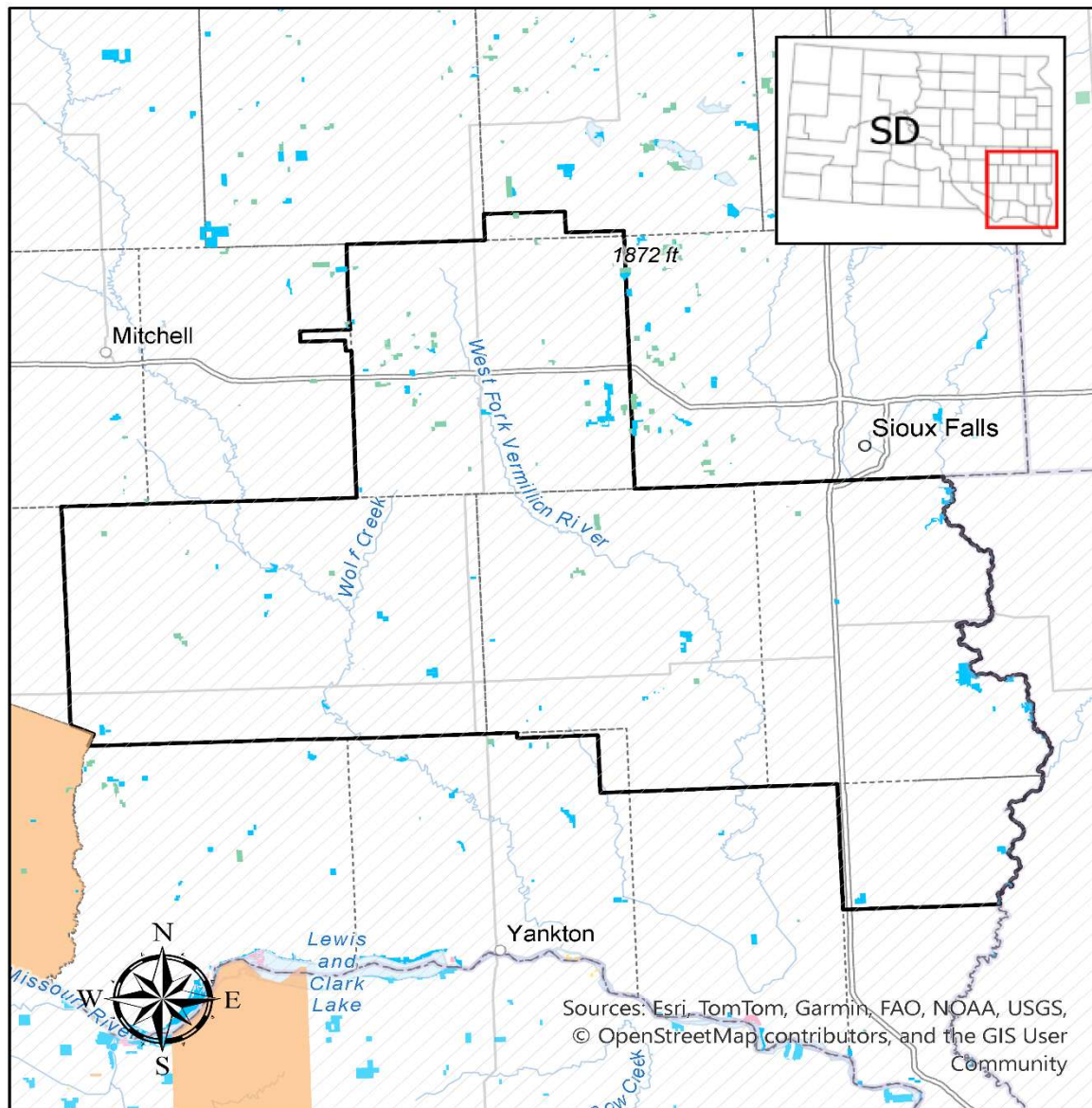
State Lands:

- Newton Hills State Park – Lincoln County: South Dakota Department of Game, Fish and Parks (SDGFP)
- Pattee Creek Game Production Area – Lincoln County: SDGFP
- Lake Lakota – Lincoln County: SDGFP
- McKee Game Production Area – Lincoln County: SDGFP
- Good Earth State Park – Lincoln County: SDGFP
- Lake Alvin State Recreation Area – Lincoln County: SDGFP
- Swan Lake – Turner County: SDGFP
- Lake Vermillion Recreation Area – McCook County: SDGFP
- Lake Menno – Hutchinson County: SDGFP and City of Menno

Federal Lands:

- None

Figure 5. General Land Ownership



General Land Ownership Map

- | | | |
|---------------------------|-----------------------|----------------------|
| — Service Boundary | Department of Defense | State |
| - - - Counties | Local | US Fish and Wildlife |
| Bureau of Indian Affairs | National Park Service | US Forest Service |
| Bureau of Land Management | Other Federal | |
| Bureau of Reclamation | Private or Unknown | |



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7.4 Public Agency and Customer Communications for Outages

SEC uses several methods to communicate with its member-consumers and the general public. These methods include its company website, social media, and local radio, newspaper and television press releases.

SEC's website includes a live outage map that provides the location of each outage along with the number of consumers involved. SEC's outage data is also linked to SDREA's outage map so consumers can gain an overall understanding of the severity of a large-scale outage and how it is affecting neighboring electric cooperatives.

During large-scale and/or high profile outage events, SEC provides active updates concerning the outage details on its social media platforms which include Facebook and X.

SEC will provide press releases to radio, newspaper, and television media outlets during long duration outage events.

7.5 Community Outreach

SEC always strives to educate its member-consumers and the general public about the dangers of wildfires and other electrical related hazards. The goal is to educate them about what to do in dangerous situations before they happen.

SEC provides this information in its monthly newsletter, in radio and print advertisements, and through public demonstrations.

Examples of SEC safety topics may include:

- Fire Season Preparation
- Defensible Space Guidelines for Property Owners
- Emergency Planning
- Local Emergency Alert Systems
- Right Tree/Right Place

7.6 Restoration of Service

If the local emergency management/emergency response agency requests a Public Safety Power Shutdown, or if SEC elects to de-energize segments of its system due to extreme weather, SEC staff will patrol the affected portions of the system before it is re-energized. Suspect equipment or powerlines that cannot immediately be patrolled will remain de-energized until SEC staff may do so. Poles and structures damaged in a wildfire must be inspected and rebuilt as needed prior to re-energization. Periodic customer and media updates of restoration status prior to full restoration shall be made.

7.6.1 Service Restoration Process

After a wide-spread outage, SEC 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 every de-energized powerline 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 powerlines and equipment for damage, foreign contacts and estimate equipment needed for repair and restoration. Powerlines located in remote and rugged terrain with limited access may require additional time for inspection. SEC personnel assist in clearing downed trees and limbs as needed.
- **Isolate:** Isolate the outage.
- **Repair:** After the initial assessment, SEC staff meet to plan the needed work. 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 are a first priority when resources are limited. Additional crew and equipment are dispatched as necessary.
- **Restore:** After repairs are made, power is restored to homes and businesses as quickly as possible. Periodic customer and media updates of restoration status before full restoration are posted on social media platforms and SEC's website.

8 Performance Metrics and Monitoring

8.1 Plan Accountability

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

- SEC's Board of Directors makes policy decisions relative to the Cooperative, and as such, it serves as the "approval authority" relative to the adoption of the WMP for SEC.
- SEC's Chief Executive Officer directs management staff responsible for operations, customer service, and finance.
- SEC Vice President of Operations and Engineering is responsible for the overall execution of SEC's WMP. Staff will be directed as to their roles and responsibilities in support of the plan.

He/she is also responsible to:

- determines when and how to notify outside agencies in cases of wildfire emergency events

- 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.
- SEC's Communications and Public Relations Manager is responsible for communicating with public safety, media outlets, public agencies, first responders, local office of emergency management, and health agencies during an emergency or planned maintenance outages.

8.2 Monitoring and Auditing of the WMP

The WMP will be reviewed annually for the purpose of updating the plan as needed to reflect knowledge gained in the preceding year and modified accordingly. A more formal review will be done every 3 years in coordination with SEC's business planning.

8.2.1 Identifying Deficiencies in the WMP

SEC's CEO shall be responsible for ensuring that this WMP meets all public agency guidelines to mitigate the risk of SEC's infrastructure 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 annual basis.

SEC's CEO or the CEO's designee shall be responsible for spearheading discussions to address any plan deficiencies and collaboration regarding solutions when updating the WMP. When deficiencies are identified, the Supervisors or their delegates are responsible for making the appropriate policy adjustments. SEC staff and qualified stakeholders are encouraged to bring any potential deficiencies to the attention of the CEO. The CEO, along with the appropriate staff, will evaluate each reported deficiency, and if determined to be valid, shall document the deficiency for further action.

8.3 Performance Metrics

SEC has developed performance metrics intended to gauge the effectiveness of its various programs and strategies for mitigating power-related ignitions (Table 6). The tracking of these metrics will help identify circuits that are most susceptible to unexpected outages, time-of-year risks, and the adequacy of the VM and asset inspection schedules. These metrics are also intended to assess the performance of different aspects of the WMP.

Because the WMP is in the initial stage of implementation, relatively limited data is available. However, as the effectiveness of mitigation programs become evident, and additional data is

collected, SEC will identify areas of its operations that will require a different approach, as well as develop additional methods to eliminate SEC asset-sourced ignitions.

Table 6. Performance Metrics

METRIC	RATIONAL	MEASURE OF EFFECTIVENESS
Red Flag Warning (RFW) days in service area	Used to adjust annual variation in criteria	N/A
Field work-related ignitions	Demonstrates management of controllable ignition events	Reduction or no material increase
Utility caused ignitions	Demonstrates the effectiveness of the plan	Reduction or no material increase
Power line down during fire season	Assess system hardening efforts in critical areas	Reduction in the general trend of events
Vegetation-caused Outage during fire season	Assess VM program work schedules/QC process	Reduction or no material increase
Vegetation-caused ignition	Assess VM program work schedules/QC process	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	Reduction in ignition-related fault activity during fire weather

8.4 System Inspection QC Process

The VP of Operations and Engineering manages the distribution line and substation assets and develops comprehensive inspection and maintenance programs. These programs ensure the safe operation of the distribution 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 managers regularly monitor inspection and corrective maintenance records and diagnostic test results to adjust maintenance plans and develop new programs. SEC will make all efforts to follow best industry practices in developing its maintenance programs.

SEC'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 and contract tree crews perform the vegetation management (VM) and clearing work for the utility. Quality control of VM activities is achieved through a structured review and audit process integrated into routine operations. Approximately 25 percent of distribution system VM work is reviewed in the field by SEC 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.

Quality assurance reviews are conducted by supervisory field personnel and designated operations staff, who are responsible for documenting findings, identifying any deficiencies, and directing corrective actions as needed. Audit results are used to evaluate overall program effectiveness, verify the adequacy of trimming cycles, and inform adjustments to work practices, schedules, or resource allocation. VM quality control records, including inspection notes and corrective action documentation, are retained in accordance with utility record retention policies and are available for internal review and audit purposes. This ongoing quality control process supports continuous improvement and ensures vegetation clearance work consistently meets safety, reliability, and wildfire mitigation objectives.

8.6 Implementation and Improvement Costs.

This section provides a summary of the estimated costs associated with implementing this WMP, including system improvements and upgrades, as required by South Dakota SB-36. The cost estimates are incremental to baseline operations and are intended for planning purposes. Costs may include but are not limited to: (1) capital investments for system hardening, protection equipment, and facility upgrades; (2) operations and maintenance expenses related to enhanced inspections, vegetation management, and operational practices; and (3) program administration, training, and monitoring. Estimated costs will be refined through the cooperative's annual budgeting process and aligned with SEC's business planning.

8.7 Approval Process

In accordance with South Dakota Senate Bill 36, SEC may submit an annual report to its Board of Directors summarizing compliance with its approved Wildfire Mitigation Plan for the prior calendar year. Upon approval by the Board of Directors, the Wildfire Mitigation Plan will be published on SEC’s website as required. Any annual report prepared under this chapter will also be made publicly available on the website. The Wildfire Mitigation Plan will be reviewed and updated as required by law and submitted to the Board of Directors for consideration and approval.

Table 7. Version History

Date	Version	Author	Revision Description
07/2026	V1	SEC	Original document adopted in 2026

8.7.1 Board Presentation

SEC’s WMP was developed by utility staff with input from relevant operational departments and reviewed by 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 utility staff and made publicly available in accordance with applicable requirements.

Appendix A: Plan and Mapping Disclaimers

WILDFIRE MITIGATION PLAN DISCLAIMER

The information provided in this report was developed by SEC staff and is intended for SEC's internal planning purposes only. SEC does not warrant the accuracy, reliability, or timeliness of any information in this report, and assumes no liability for any errors, omissions, or inaccuracies relative to the information provided. SEC shall not be held liable for any losses caused by utilization of the information set forth in this WMP. Portions of the data set forth in this WMP may not reflect current conditions. Any person or entity who relies on any information obtained from this WMP does so at their own risk. The information set forth within this WMP is presented by SEC staff "AS IS" and is intended solely for internal use by SEC. SEC or its staff make no representations or guarantees expressed or implied regarding the accuracy or completeness of this WMP.

WMP MAPPING DISCLAIMER

Maps in this WMP were created from multiple datasets from various, public, and private sector sources and may include utility Geographic Information System (GIS) data. The geographic information contained in the map(s) is not to be used as a "legal description" or for any purpose other than general planning and reference by SEC or its staff. Every effort has been made to ensure the accuracy of the map(s), but errors in source documents do occur and inherent mapping ambiguities are not shown.

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Appendix B: SB-36 Cross Reference Table

SB-2339	Guidelines Regarding Wildfire Mitigation Plans	Plan Section Number
SB-36, §2	A qualified utility that is not an electric cooperative or municipal utility may submit a wildfire mitigation plan to the commission for filing and publishing.	
SB-36, §2	An electric cooperative or municipal utility may submit a wildfire mitigation plan to its approval authority for review and approval, and upon approval must publish the plan on its website.	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.	2.6, 2.6.1
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
SB-36, §3	Annual Report	
SB-36, §3	A qualified utility with a published wildfire mitigation plan shall submit an annual report detailing compliance with the plan for the prior calendar year, no later than June first of each year.	8.7