

Wildfire Mitigation Plan



2026

**Appendix F:
Public Safety
Power Shut Off
Plan**



Statement from Avista Executive Management

2025 represents Avista's 2nd year of implementing the Public Safety Power Shutoff (PSPS) Plan. This Plan adds to the work being done to minimize risk of wildfire in Avista's 2026 Wildfire Mitigation Plan. The framework for operationalizing a PSPS Plan at Avista is firmly rooted in our 135-year operating history and represents the collective knowledge of Avista employees and fire agency professionals together with assistance from peer utilities, and most importantly, engagement with customers. It also reflects our commitment to partner with customers, communities, and those who manage forest landscapes and fight fires.

We all have a role to play in minimizing the risk of wildfire.



Heather Rosentrater, President and Chief Executive Officer (CEO)

Date: 11-20-2025



Wayne Manuel, Senior Vice President, Operations and Technology

Date: 11-20-2025



Josh DiLuciano, Vice President Energy Delivery

Date: 11-20-2025



Elizabeth Frederiksen, Director of System Operations

Date: 11-20-2025



Matt Ugaldea, Manager of Wildfire Resiliency Program

Date: 11-20-2025

Document Owner: The Wildfire Resiliency team is responsible for maintaining this document. This includes coordinating with Emergency Management in scheduling annual reviews and exercises, updating content based on annual reviews and exercises, and redistributing new versions of the document to stakeholders.

The plan will be reviewed and exercised annually. The scale of the exercise will be determined by the Wildfire Executive Committee in coordination with Wildfire Resiliency personnel and key leadership.

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Appendix A: Notification Plan

1. INTRODUCTION

In the Northwest, the number, size, and severity of wildfires have increased in recent years. This trend is expected to continue as temperatures rise, and drought persists¹. Avista published its first Wildfire Resiliency Plan in June of 2020, which introduced the risks, costs, and benefits of implementing a holistic set of measures to reduce utility wildfire risk. The 2020 Plan built upon Avista's operating history responding to and mitigating for wildfire activity in addition to adopting other risk mitigation strategies employed by peer utilities. Avista updated its Wildfire Mitigation Plan in 2025 which incorporates updates to existing mitigation efforts, introduces new strategies, and reinforces Avista's ongoing commitment to minimizing wildfire risk for its communities, customers, and infrastructure.

Similar to other utility wildfire mitigation plans, Avista is making investments in four key areas:

Grid Hardening – investing in electric infrastructure to reduce spark ignition outage events and to protect critical assets from the impact of wildfires.

Enhanced Vegetation Management – reducing the number of vegetation-related issues that can lead to outages and/or spark events by inspecting our powerline assets in high-risk areas to identify and mitigate risk trees. Adding remote sensing technologies such as LiDAR and satellite imagery to enhance overall vegetation management information and decision-making.

Situational Awareness – providing both static and dynamic tools needed to identify and response to wildfire risk.

Operations & Emergency Response –preparing for and effectively reacting to wildfire situations, including operational tactics during a wildfire situation as well as training and collaborating with critical partners in managing wildfire events in a holistic, unified way to protect our customers and communities.

As part of its operational mitigation strategies, Avista has developed this Public Safety Power Shutoff Plan (PSPS Plan or Plan) to guide the assessment and decision making process when determining to proactively de-energize electrical facilities in identified areas of extreme wildfire risk when conditions make the wildfire risk so severe it is deemed more unsafe to operate our electrical facilities than the reliability risk of de-energizing. Proactive de-energization reduces the potential of electrical facilities to become a wildfire ignition source if there is a fault or creating safety concerns for not only our customers and communities but first responders and Avista staff as well.

¹ USDA Climate Hub, "Climate Change and Wildfire in Idaho, Oregon, and Washington," <https://www.climatehubs.usda.gov/hubs/northwest/topic/climate-change-and-wildfire-idaho-oregon-and-washington>

2. ACRONYMS

AAR – After Action Review

AE – Account Executive

CEO—Chief Executive Officer

CRC – Community Resource Center

DNR – Department of Natural Resources

DOT – Department of Transportation

EM – Emergency Management

EOC – Emergency Operations Center

EOP – Emergency Operations Plan

ERT – Estimated Restoration Time

EWC – Executive Wildfire Committee

FRI – Fire Risk Index

FSM – Fire Safety Mode¹

FWW –Fire Weather Watch

GIS – Geographic Information System

ICS – Incident Command Structure

IPUC – Idaho Public Utility Commission

IVR – Interactive Voice Response

NWS – National Weather Service

OEM – Office of Emergency Management

PG&E – Pacific Gas & Electric

PSPS – Public Safety Power Shutoff

PUC – Public Utilities Commission

RBM – Regional Business Manager

RFW—National Weather Service issued Red Flag Warning

WRMAA – Western Region Mutual Assistance Agreement

WUTC – Washington Utility and Transportation Commission

¹ Formerly known as Dry Land Mode (DLM)

3. PUBLIC SAFETY POWER SHUTOFF OVERVIEW

Over the last several decades, the western United States (U.S.) has experienced an increase in the intensity of wildland fires (wildfires). There have been several factors contributing to this trend, including climate change, increased human encroachment in wildland areas, historical land management practices and changes in forest health. Recent events in western states have increased awareness of electric utilities' role in wildfire prevention and mitigation.

Avista has always prioritized keeping our communities and customers safe and continues to do so by increasing the resilience of Avista's transmission and distribution (T&D) facilities. As part of its wildfire mitigation operations, Avista developed this PSPS Plan to proactively shut off power to electrical facilities during extreme weather events when the risk of wildfire outweighs the reliability concerns of de-energizing. Based on the inherently disruptive nature of power outages, PSPS events must be carefully evaluated under this Plan to balance wildfire risk with reliability risk, understanding the potential impacts a PSPS would have on Avista customers and the communities it serves. For Avista, proactive de-energization is a measure of last resort to reduce wildfire risk.

4. PURPOSE & SCOPE

This PSPS Plan identifies relevant considerations, decision process flow and implementation protocols before, during and after a PSPS event. The Plan will be active during wildfire season (typically May – October) and reviewed and updated annually as necessary prior to the start of the next wildfire season.

Nothing in this Plan supersedes the general authority of Avista to de-energize a power line during an emergency, and a decision (i.e., to protect fire response personnel or to protect company assets from fire damage) might be made without complying with the notification and outreach sections of this Plan. In addition, extreme weather events are, by their nature, unpredictable and unique, so the specific considerations applicable to any decision regarding possible de-energization may vary based on the specific circumstances.

The key goals Avista considers for the foundation of the Plan are listed below:

- Advancing the safety of customers, communities, first responders and Avista employees
- Collaborating with key external stakeholders (agencies, counties, local governments, public safety partners, tribes and first responders)
- Minimizing both potential wildfire risk and power outage impacts on communities and customers
- Maintaining reliable electric service

5. PSPS RISK-INFORMED DECISION MAKING

5.1. Wildfire Risk

Avista's 2019 Wildland Urban Interface (WUI) map combined data from the Wildfire Hazard Potential with the location of Avista electric lines in areas of low, medium, and high population.

In 2023, Avista's WUI map was updated and now includes additional data which measures the impact of fire on human development. The USDA's Housing Unit Impact Dataset-14 combined with the Wildfire Hazard Potential data mentioned previously, was used to refine the Avista WUI map. Communities such as Chewelah and Colville border national forest lands, as do many other areas including Sandpoint, St. Maries, Grangeville, and portions of the Lewiston/Clarkston Valley, placing them at higher risk. Spokane County, having seen significant population growth, has an increasing number of housing developments within high fire threat areas, increasing the risk of wildfire impacts. According to the updated data, 2,746 miles of electric distribution lines are in high fire risk areas, or about 36% of the system. Although this analysis indicates slightly lower risk values compared to 2019, it still demonstrates significant fire risk potential throughout the service territory.

5.1.1. PSPS Feeders & Circuits

In 2023, Avista developed a list of 25 distribution feeders with the highest likelihood of being included in a PSPS event (the Top 25 List); this list was developed using the existing Avista Fire Weather Dashboard, wildfire data, historic outage data and scenario planning. This Top 25 List was developed as part of Avista's risk-based approach to preparedness. The Top 25 List assists with the planning and preparedness process to support our customers in the event of a PSPS event; the list does not preclude Avista from initiating a PSPS on other feeders or circuits in its service territory. The maps below include those feeders where a PSPS event is most likely to occur:

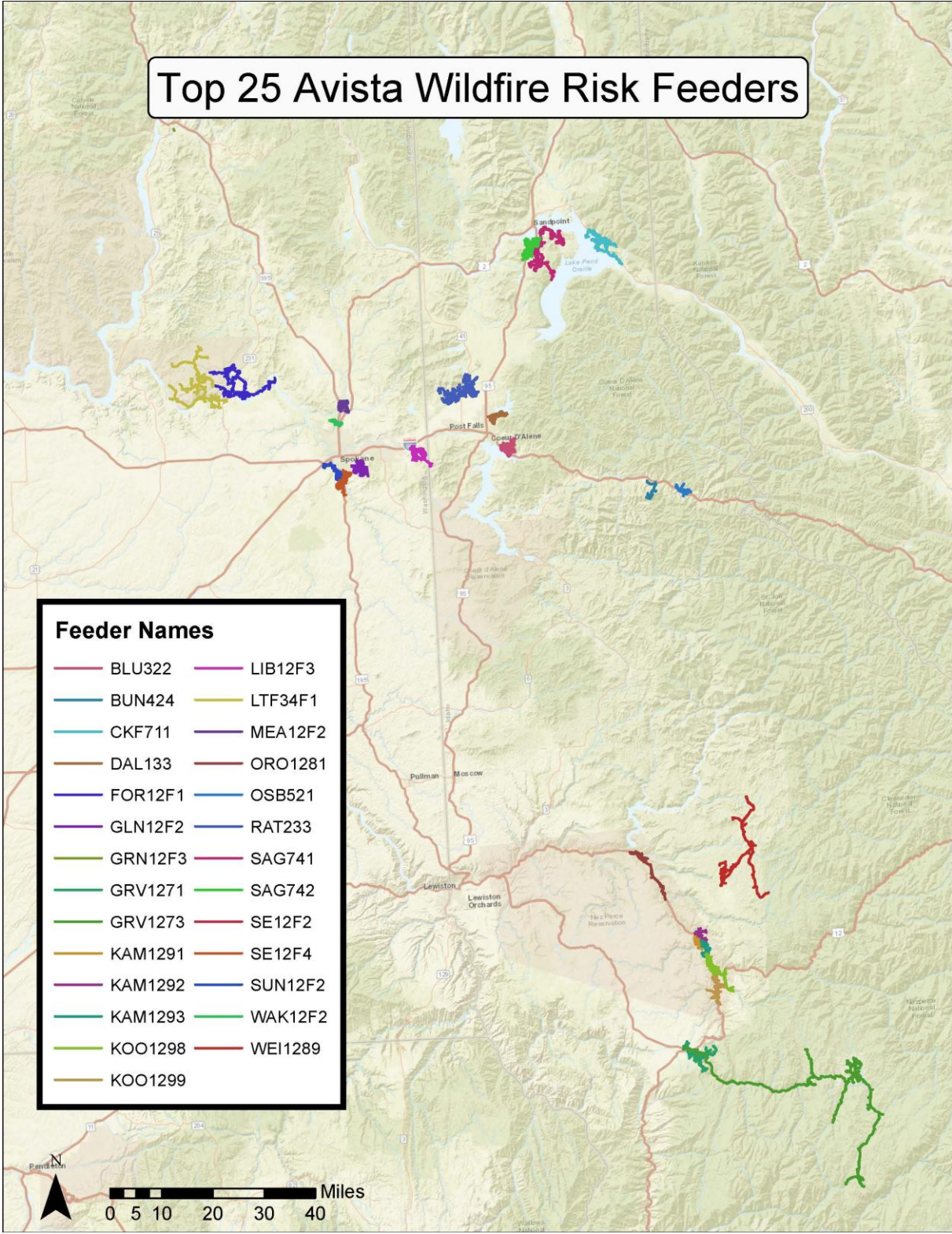


Figure 1
PSPS Top 25 Avista Wildfire Risk Feeders Map

Avista Wildfire Risk Feeders in Spokane, Washington and Coeur d'Alene, Idaho Areas

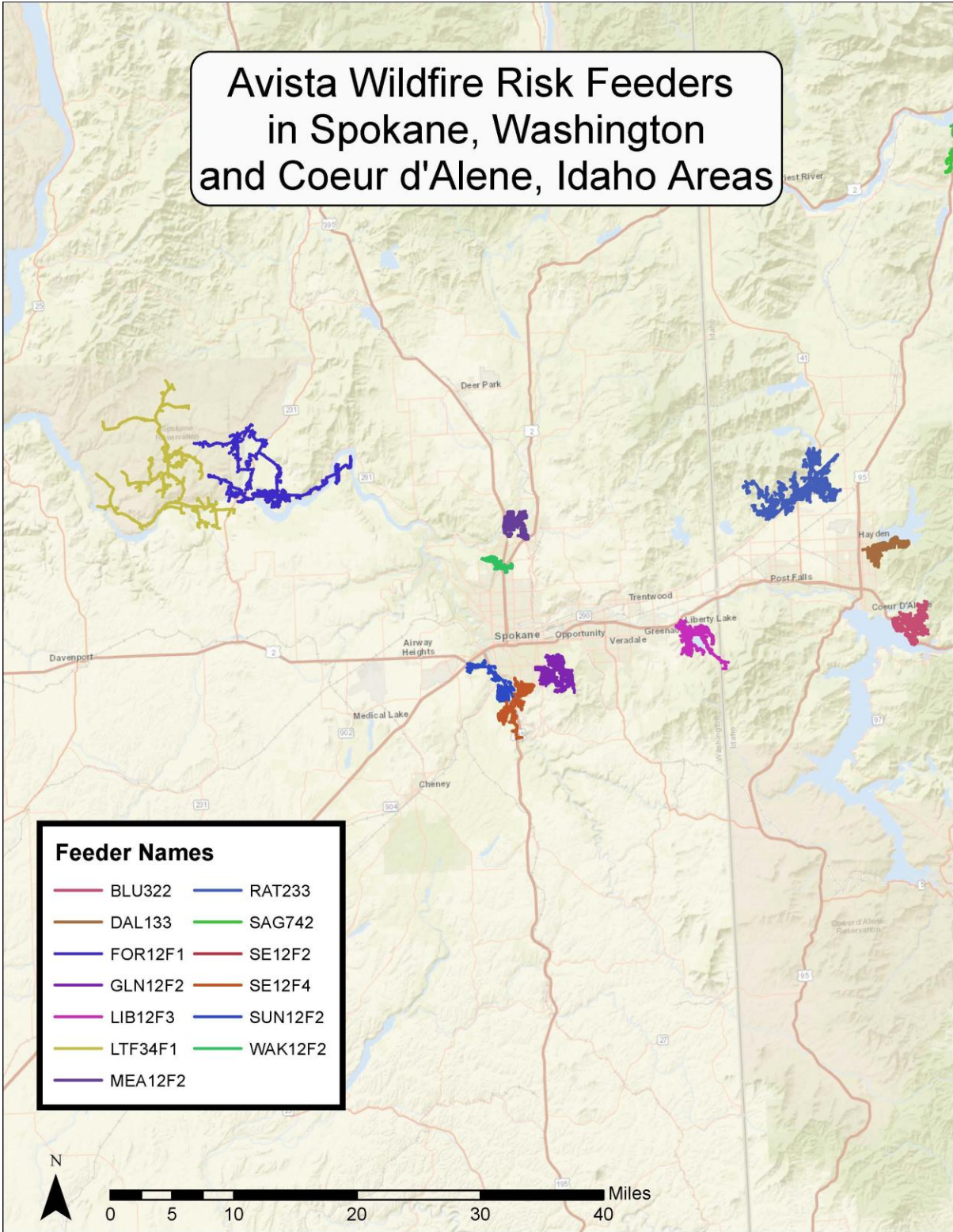


Figure 2
PSPS Spokane & Coeur d'Alene Risk Feeders Map

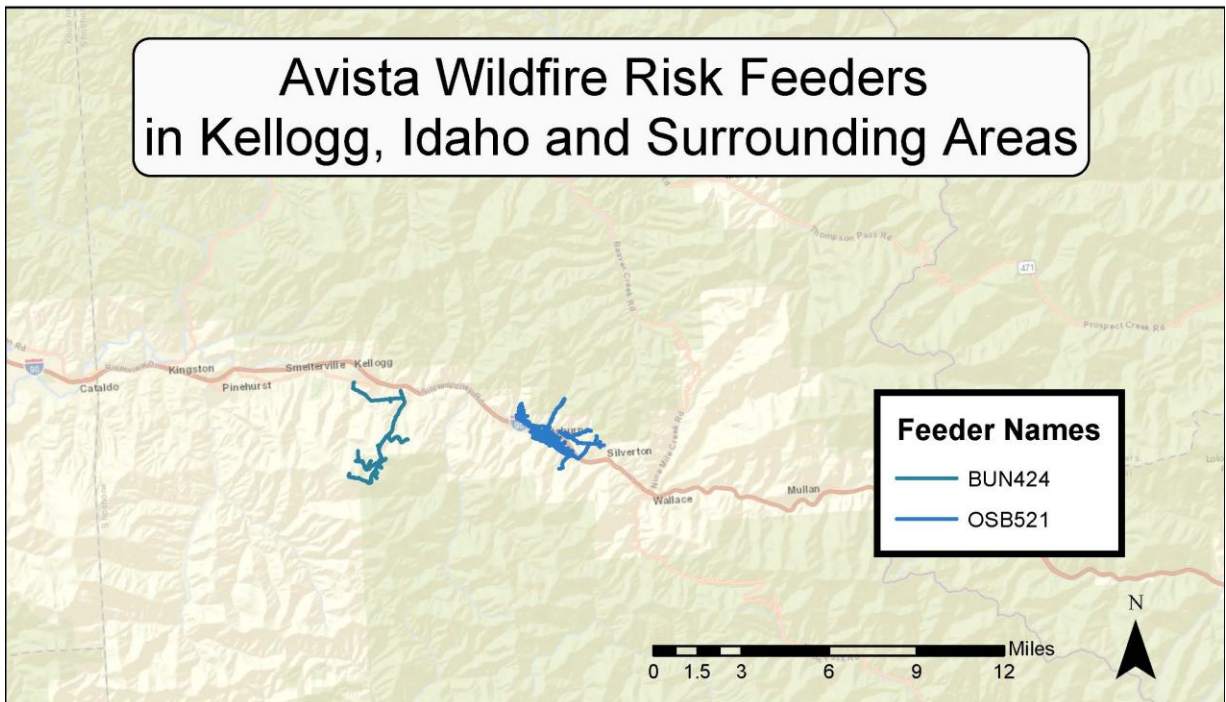
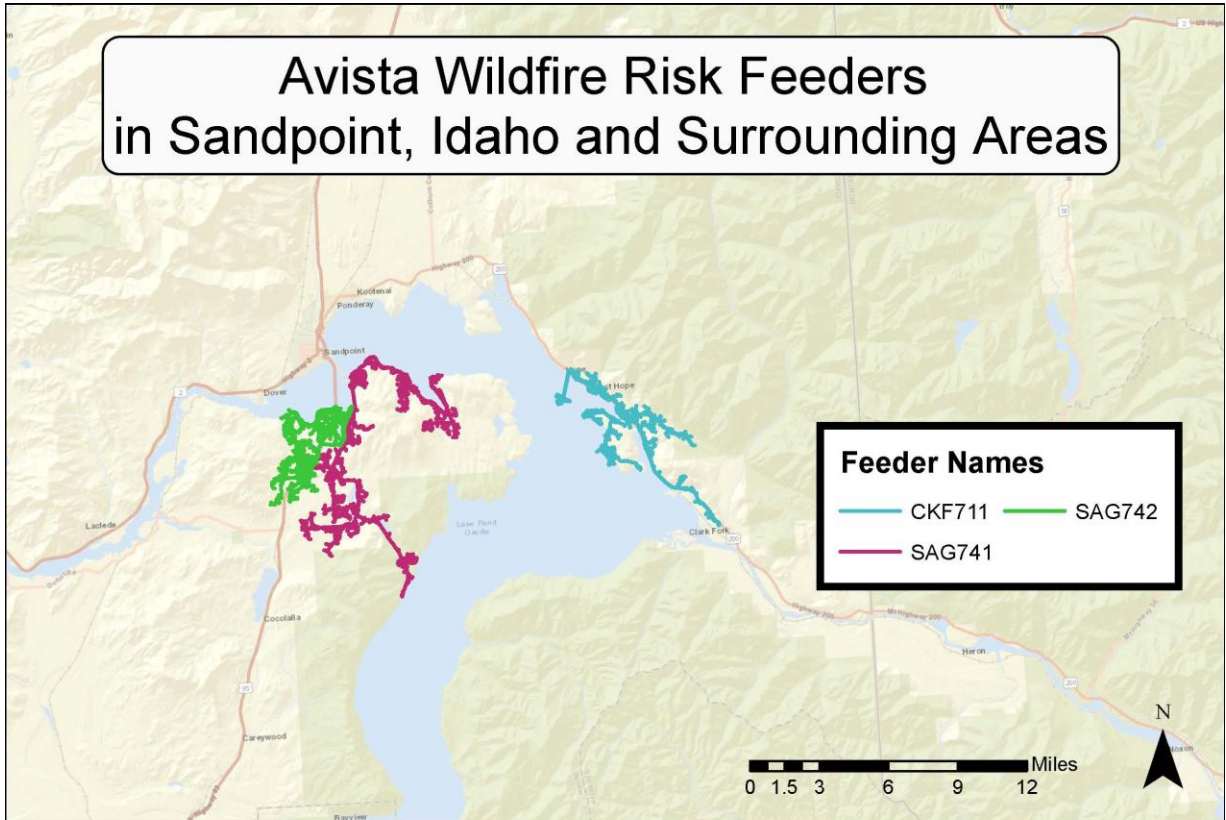


Figure 3
PSPS Sandpoint & Kellogg Risk Feeders Map

Avista Wildfire Risk Feeders in Grangeville, Idaho and Surrounding Area

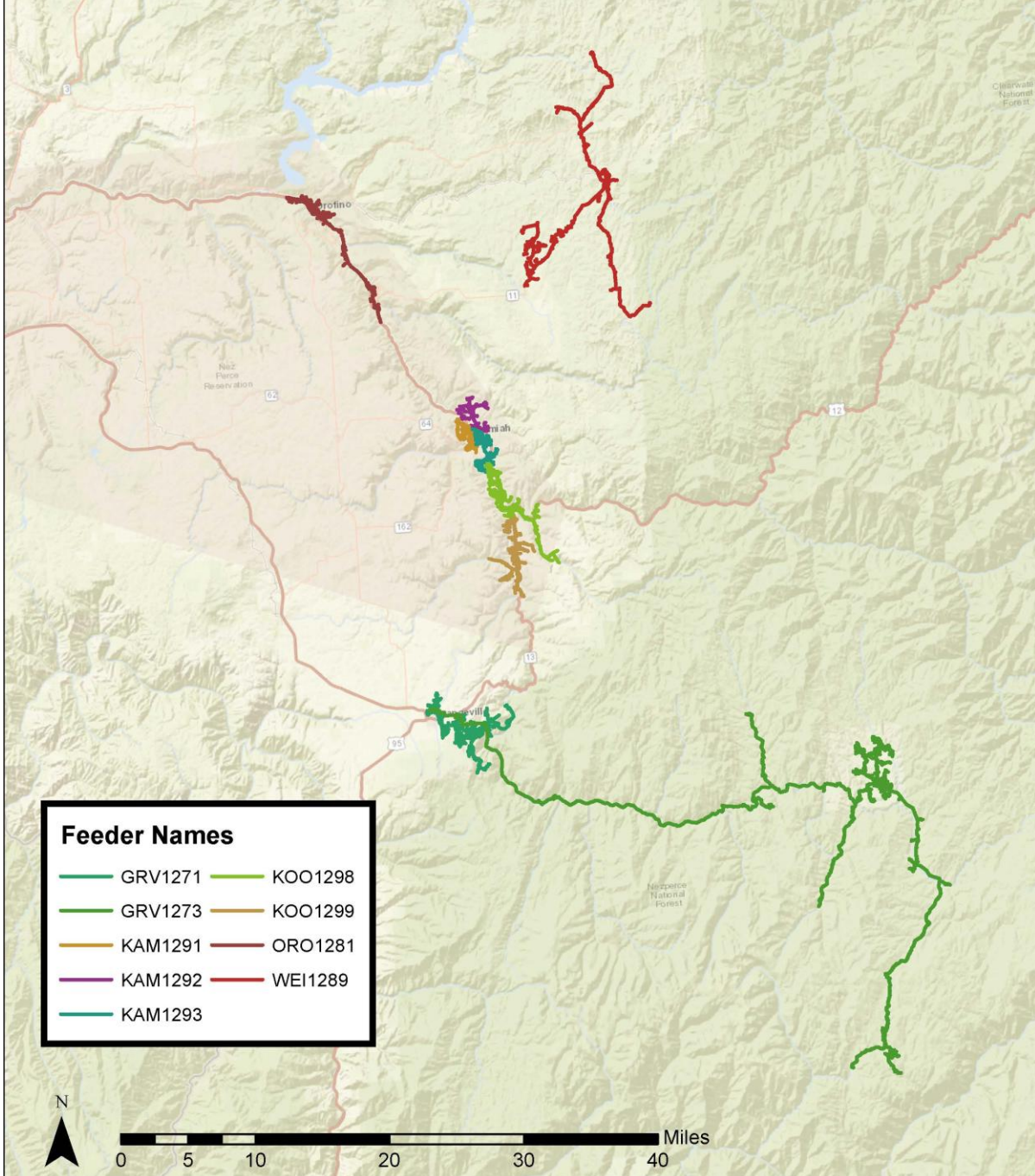


Figure 4
PSPS Grangeville Risk Feeders Map

5.2. PSPS Weather Monitoring and Review

As a general matter, Avista would initiate a PSPS at specific locations if the Company determines, based on the circumstances and information available at the time, that a combination of critical conditions creates a consequential risk of wildfire ignition, as well as spread, with the potential for severe impact, and that those risks outweigh the corresponding risks associated with initiating the PSPS.

5.2.1. *Fire Risk Index (FRI)*

Avista developed a Fire Risk Index (FRI) to support short-term forecasting of wildfire threat across its service areas. The FRI integrates multiple data sources—including weather conditions, fuel types (shrubs, trees, grasses), topography, community risk, historic summer outages, Severe Fire Danger Index, Fire Preparedness, and the percentage of overhead spans in treed areas—into a single numerical score ranging from 0 to 9.

- 0 represents very green, wet fuels with low wind and high humidity
- 9 represents very dry fuels (live and dead), low humidity, and extreme wind speeds

These scores are grouped into five index levels:

1. **Green (Low)** – FRI 0–4.0: Fire spread possible, minimal outage risk
2. **Blue (Moderate)** – FRI 4.1–5.4: Mixed risk profiles for outage and fire spread
3. **Yellow (High)** – FRI 5.5–6.4: Elevated risk of outage and/or fire spread
4. **Orange (Very High)** – FRI 6.5–6.9: Very high risk of outage and fire spread
5. **Red (Extreme)** – FRI \geq 7.0: Extreme risk of both outage and fire spread

The FRI has been used to guide operational decisions, including the consideration of Public Safety Power Shutoffs (PSPS) when the FRI reaches 7.0 or higher, alongside other situational factors.

Note: While the FRI has played a key role in wildfire risk assessment for the 2024 and 2025 seasons, Avista is evolving its methodology and will transition to a similar, but new approach in 2026 for PSPS decision making. The FRI will not be used in the same capacity next year, and the next version of this Plan will reflect updated tools and strategies to assess and respond to wildfire risk.

5.2.2. *National Weather Service Red Flag Warning*

A Red Flag Warning (RFW) is a forecast warning issued by the National Weather Service (NWS) to inform the public, firefighters and land management agencies that conditions are ideal for wildland fire combustion and rapid spread. RFWs are often

preceded by a Fire Weather Watch (FWW), which indicates weather conditions that could occur in the next 12–72 hours resulting in a Red Flag Warning.

The NWS has developed different zones across the nation for providing weather alerts (such as RFWs) to more discrete areas. These zones are shown on this NWS webpage: [Fire Weather](#).

The following thresholds are used by most NWS offices:

Daytime:

- Relative humidity of 25% or less
- Sustained winds greater than or equal to 10 miles per hour (mph) with gusts greater than or equal to 20 mph over a four-hour period

Nighttime:

- Relative humidity of 35% or less
- Sustained winds greater than or equal to 15 mph with gusts greater than or equal to 25 mph over a three-hour period

Lightning:

- The NWS rarely issues RFWs for lightning in the western United States. For this to occur, the Lightning Activity Level—a measure of lightning potential specifically as it relates to wildfire risk—needs to be at 3 or higher.

Although Red Flag Warnings are used as a tool for forecasting, they are only one factor Avista considers when determining initiation of a PSPS event. Initiating a PSPS will require a refined and focused approach for specific feeders rather than an entire geographic area; consequently, a RFW cannot be used as the sole determinative factor in whether to initiate a PSPS in any specific region or area.

5.2.3. Agency Input

Coordination with agencies like the Washington State Department of Natural Resources (DNR) and Idaho Department of Lands (IDL) will also aid in the decision making for PSPS events. During wildfire season, DNR provides weekly briefings which assist in analyzing drought conditions and weather forecasts. IDL also holds meetings during wildfire season to provide updates on wildfires and weather conditions.

6. PSPS OPERATIONS

6.1. General

PSPS preparedness is a cyclical effort involving Avista, public safety partners, state and local governments, communities and customers. The Director of Wildfire Resiliency along with the Manager of Wildfire Resiliency coordinate and facilitate activities of multiple Avista business units for wildfire prevention and mitigation activities while Business & Public Affairs, Customer Solutions and Corporate Communications facilitate public outreach and coordination efforts with external stakeholders.

6.2. Decision Process for PSPS

The weather monitoring and situational awareness criteria outlined in Chapter 5, in addition to other factors mentioned, will assist Avista in determining whether a PSPS event may be warranted. The decision to initiate a PSPS in any given situation based on the best available information at the time, will come from final approval from a team of executives acting on recommendations provided by the assessment team.

6.3. Event Response & Management

Avista will transition to *PSPS Watch* approximately 7-2 days prior to a potential PSPS event at the direction of the Director of Wildfire Resiliency (Wildfire Lead). During the *PSPS Watch* phase, Avista will activate the PSPS Assessment Team, which includes directors (or delegates) from business units across the company. The PSPS Assessment Team will meet as needed to discuss current and forecasted weather conditions and other critical information regarding a potential PSPS event. The Director of Wildfire Resiliency will facilitate the PSPS Assessment Team meetings and conference calls to ensure operational readiness for a potential event. The Director of Wildfire Resiliency and Manager of Wildfire Resiliency will provide a recommendation to the Wildfire Executive Committee taking into account input from the PSPS Assessment Team. The Director of Wildfire Resiliency will determine whether to remain at a *PSPS Watch*, escalate to *PSPS Warning*, or de-escalate to seasonal FSM operations. The PSPS Assessment Team will decide if Avista will issue a preliminary notification of a potential PSPS event to public safety partners and critical facilities operators. The first notification to governmental agencies and emergency management partners could occur during the 7-2 day PSPS Watch phase.

An Emergency Operating Plan (EOP) briefing will be initiated as early as 7 days prior to the initiation of a PSPS Event. The Director of Electric Operations will aid in the coordination of the PSPS event in close collaboration with the Director of Wildfire Resiliency (Wildfire Lead). See Figure 5 for organizational process flow and transition into the EOP event. The procedures and incident management structure outlined in the most current edition of the Avista Emergency Operations Plan will be followed to coordinate the recovery from a PSPS event.

During *PSPS Watch*, the PSPS Assessment Team will review the PSPS Plan and supporting documents. An operational risk assessment will be performed as well to determine risks and vulnerabilities. A determination will be made whether to escalate to *PSPS Warning* by the Director of Wildfire Resiliency approximately 48-24 hours in advance of a potential event. Within one hour of initiating a *PSPS Warning* notification, the full PSPS team will be placed on stand-by and team member availability will be determined. The full PSPS team is the PSPS Assessment Team plus the Wildfire Executive

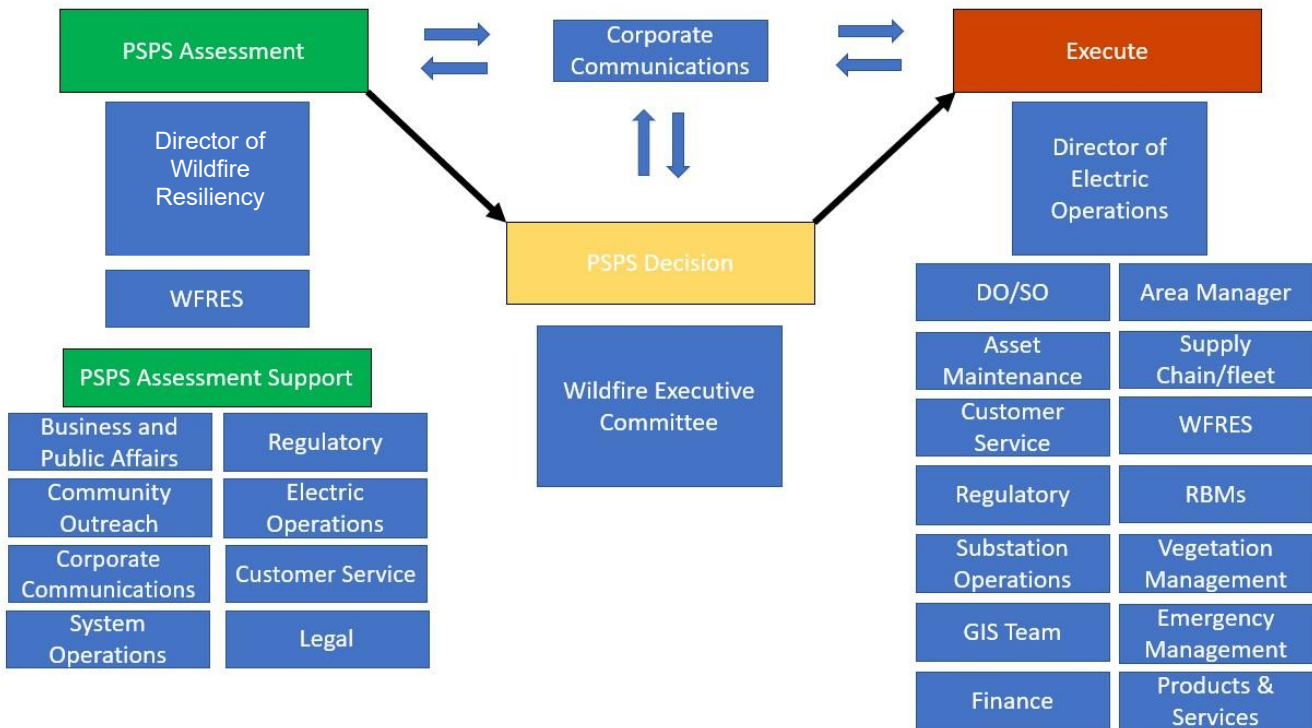


Figure 5
Organizational Process Flow

6.4. De-energization Protocols

Distribution Operations will develop the switching plan(s) to support PSPS execution once the decision has been made to initiate a PSPS event. A final review of the switching plans by the Director of System Operations will be completed prior to any PSPS execution. After the final approval to activate PSPS is received, the Director of Electric Operations will work with the appropriate District Operations Manager(s) to execute de-energization protocols.

6.5. Proactive De-energization of Transmission Lines

For the 2025 wildfire season, Avista added consideration of non-reclosing protection schemes as well as de-energization, of 115kV transmission lines in certain situations. Avista's transmission system is key to system reliability, and many factors will need to be considered in decision making regarding transmission lines, just as is done on the distribution system. Further analysis will be done regarding 230kV transmission lines. Although Avista is not expecting to proactively de-energize 230kV transmission lines, the same situational awareness of the risk and the impacts will be done for all transmission lines.

Decision-Making Process

Decisions related to transmission line de-energization and re-energization will be made by the Wildfire Executive Steering Committee, as well as the Director of System Operations and the Chief System Operator. Additional stakeholders will be included as appropriate. System Operators will provide input, feedback, and concerns regarding available options and their impacts.

Factors that will be considered in the decision-making process may include, but is not limited to, the following:

- Fire Risk Index
- Impact on reliability from taking line out (outages, dropping load, curtailment, etc.)
- Location of transmission line(s)
- Predicted future weather forecast
- Historical performance/outages of transmission line
- Impact on neighboring utilities

Once a decision is made regarding de-energizing a transmission line or not, the rationale should be documented.

Fire Rating Index (FRI)

The Fire Risk Index described earlier in Section 5.2.1 is the same scoring ranges, color categories, and risk definitions that will be used to assess both transmission lines and distribution lines.

6.6. PSPS Recovery (Monitor, Patrol, Restore)

Power restoration following a PSPS is similar to restoration after a major storm. In traditional storm restoration efforts, the priority is to restore service to as many customers as possible through line switching and by isolating faulted circuits. Restoration efforts may also include consideration of customers most heavily impacted by outages or located in Named Communities.

One of the significant differences from restoration after a major storm versus a PSPS, is the process of patrolling. If a utility de-energizes lines for a PSPS event, facilities cannot be re-energized until all circuits and lines are thoroughly patrolled, because when the line is de-energized, there is no way to know if damage occurred on the line or not. After patrolling, lines are re-energized segment by segment. Patrol of all impacted overhead electric facilities, both transmission and distribution, can only commence once the weather event has subsided. Restoration efforts following a PSPS will always require additional time to fully patrol each circuit, to verify whether there was damage during the weather event.

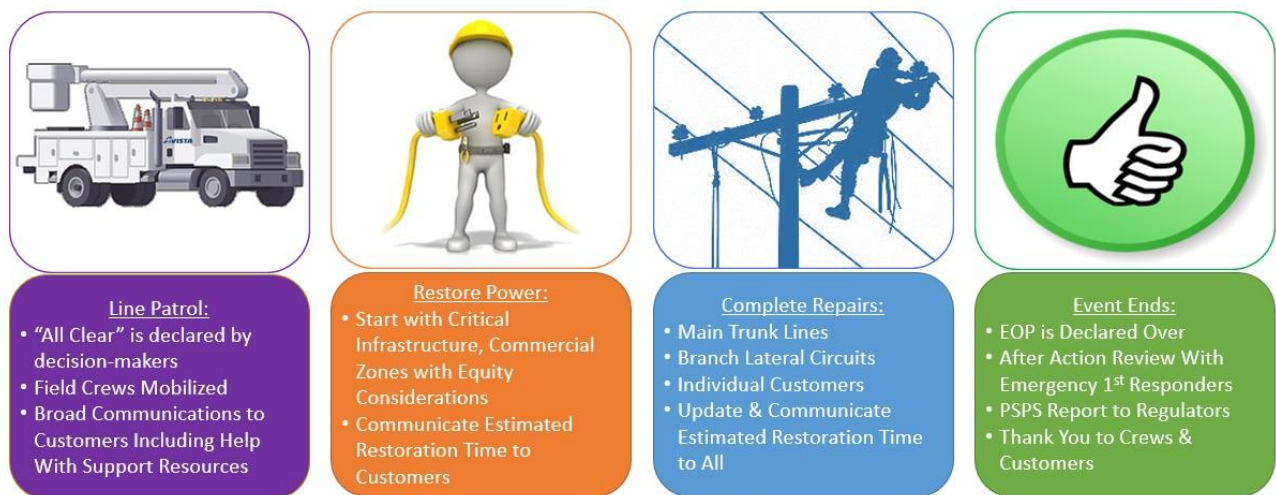


Figure 6
Restoration Process

Restoration Process

One element of the PSPS restoration plan includes pre-staging two-person crews at known PSPS facility locations when conditions allow, since these locations are identified in advance of the event. The plan also accounts for the potential need to assign additional resources to impacted transmission and distribution lines outside of the PSPS areas. Patrol activities begin once an all-clear is issued. The timing of patrol completion depends on several factors, including the extent of system damage, crew availability, and the ability to conduct aerial patrols, which may be limited by weather conditions.

In scenarios where multiple circuits are affected, Avista may consider initiating a mutual assistance request from other utilities and engaging outside contractors to support restoration. The availability and location of these additional resources can influence restoration timelines.

As Avista further develops and refines its restoration efforts, specifically after the occurrence of

a PSPS, Avista will need to prioritize balancing and allocating additional resources to circuits that may have been impacted by storm damage in Named Communities, in areas with critical customers, and in areas with large numbers of customers. This will help ensure that restoration efforts are equitable for the most vulnerable and highly impacted customers that may not have equal means or access to resources during prolonged outages. This additional effort will take more time and resources during the restoration process but ensures that equity is being applied to the PSPS restoration process.

7. ROLES & RESPONSIBILITIES

Electric Field Operations

- Work closely with **PSPS Assessment Team** on field conditions and Estimated Restoration Times (ERTs).
- Participate in After-Action Reviews (AARs) (further discussed in Section 12 below) and ensure modifications to PSPS protocols are implemented as necessary.

Electric Distribution Operations

- Develop and implement safe and reliable power shutoff protocols and procedures.
- Ensure System Operators and Distribution Operators are appropriately trained to perform relevant responsibilities under this PSPS Plan, and that such employees receive timely information regarding wildfire risk and weather conditions for purposes of performing those responsibilities in the event of a PSPS.
- Participate in the PSPS Assessment Team with PSPS evaluation and decision-making.
- Safely restore service to PSPS areas when notified by Electric Field Operations that patrolling has been completed as well as any needed repairs.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Director of Wildfire Resiliency

- Serves as the Wildfire Lead
- Activate the PSPS Assessment Team if a PSPS is likely.
- Support EOP Lead in facilitating PSPS event.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Wildfire Resiliency

- Oversee wildfire mitigation program (including this Plan) and support cross departmental collaboration.
- Monitor daily, weekly and long-term weather and wildfire forecasts.
- Monitor weather conditions for Fire Weather Watches, Red Flag Warnings and High Wind Watches and Warnings.
- Communicate with Washington Department of Natural Resources (DNR) and Idaho Department of Lands (IDL).

- Oversee operation of the Customer Resource Centers and designated contractor prior to and during PSPS event.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Corporate Communications

- Work directly with the PSPS Assessment team to create external messages to share with stakeholders and customers regarding PSPS events.
- Implement its developed Notifications Plan to notify customers and employees on a wide range of channels and in coordination with Avista's Customer Service and Community Outreach teams. See appendix A: PSPS Notification Plan for additional details.
- Participate in AARs and ensure modifications to PSPS protocols and communication practices are modified as necessary.
- Ensure a coordinated and cohesive external and internal communication and notification plan is in place and reviewed annually.

Customer Service

- Respond to customer calls and respond to questions with information provided by Corporate Communications.
- Ensure customer service representatives are trained to manage customer interactions during a PSPS event.
- CARES Team will provide additional communications to Life Support customers managed under their case load.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Business and Public Affairs

- Communicate with external partners, governmental agencies, public safety partners and critical business customers on updates and status regarding PSPS watches, PSPS warnings, activity and following a PSPS outage.
- Coordinate internally with Corporate Communications and Wildfire Executive Committee to ensure consistent communications with external partners and customers.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Supply Chain Management

- Ensure contract resources are appropriately trained to perform all relevant responsibilities under this PSPS Plan.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Fleet Management

- Ensure employees are appropriately trained to perform all relevant responsibilities under this PSPS Plan.
- Ensure readiness of resource pool equipment for a PSPS event.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Substation Operations

- Monitor substations and perform actions to support PSPS operations.
- Coordinate activities with Dispatch and Customer Service.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Vegetation Management

- Following de-energization, and when it is safe to do so, Electric Field Operations will report impacts to infrastructure and assets from vegetation, as appropriate.
- Vegetation Management will work toward removing risk trees created by the wind or storm event in order to re-energize system.
- Ensure contractors and field personnel are appropriately trained to perform all relevant responsibilities under this PSPS Plan.
- Use reasonable efforts to ensure contract resources are available and prepared for PSPS events.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Products and Services

- Provide necessary updates to outage map vendor.
- Assist with Estimated Restoration Time calculations with the Operations Managers
- Update Internal Communications Portal with current Estimated Restoration Times (ERTs) during an event.

- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Geographic Information Systems

- Work with Electric Operations and Corporate Communications to ensure PSPS boundary information for PSPS GIS maps is accurate and up to date for emergency planning partners.
- Before wildfire season and during preliminary notifications of a potential PSPS event, provide relevant GIS data within the confines of applicable law to public safety partners.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Executive Officers

- Provide guidance and direction as part of the Wildfire Executive Committee where appropriate in order to evaluate whether to initiate PSPS event.
- Provide oversight for additional Plan changes prior to next wildfire season.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Legal

- Provide legal guidance in evaluating a potential PSPS event.
- May direct AARs after a PSPS event (or potential event in which the PSPS Assessment Team is activated).
- Involved in reviewing communications and holding statements to customers, media, public safety partners, critical facilities, and involved communities.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Regulatory

- May provide regulatory guidance in evaluating a potential PSPS event.
- May be involved in reviewing communications to customers, public safety partners and critical facilities.
- Assist in/direct regulatory reporting/filing activities.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

Emergency Management

- Coordination and assistance with activation and operation of EOP event.
- Help facilitate the AARs and ensure modifications to PSPS protocols are implemented as necessary.

Finance

- Provide financial accounting assistance for EOP event (for example, providing a Project and Task code for event tracking purposes).
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

8. COMMUNITY OUTREACH & PREPAREDNESS

8.1. Outreach and Communication Overview

The communication and outreach leading up to, during, and after a PSPS event is critical for all of Avista’s stakeholders, which includes customers, emergency management agencies, tribal agencies, as well as others. The communication and support provided to each of the stakeholder groups are described below. On an annual basis, Avista will evaluate the effectiveness of these tools and programs used to support customers and determine if changes are needed.

8.2. Proactive Customer Communications

Although the size of Avista’s service area, geographic and environmental diversity, and unpredictable nature of weather make it challenging, Avista aims to provide as much advance notice as reasonably possible in preparation for a PSPS event. Figure 7 provides Avista’s optimal communication timeline for PSPS events, circumstances permitting.

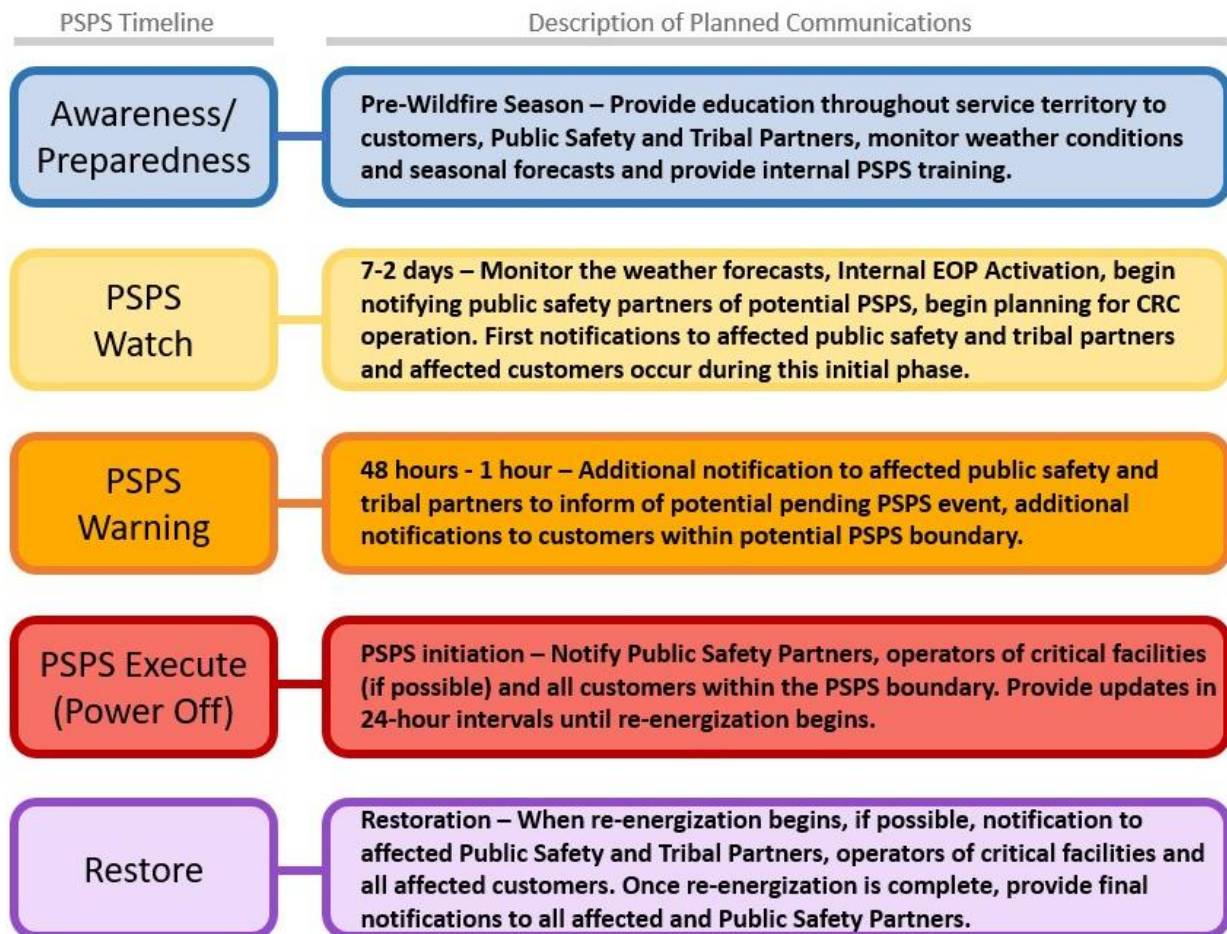


Figure 7
Communication Timeline

8.3. Coordination with Public Safety Partners, Municipalities and Tribal Entities

Strong partnerships have been developed with other utilities as well as local public safety, emergency management agencies, and tribal entities over the last several years to assist in the coordination for any event which impacts the communities we serve. Avista will serve as the initiating agency in the event of a PSPS and will coordinate with the local agencies as appropriate. Avista will collaborate with those agencies with expertise and consider any recommendations offered by state and local emergency management agencies. Any non-outage related issues or incidents that arise during a PSPS will be handled by local emergency management and public safety.

Avista Regional Business Managers will maintain regular outreach with local jurisdictions to include voice and email notifications and communication during the event. Additionally, if requested, an Avista employee may be dispatched to the affected State or County Emergency Operations Centers in the role of Liaison Officer and will provide a constant and direct conduit for information.

8.4. Community Support

In addition to proactive communications to customers, and outreach to public safety partners, municipalities, and tribal entities, there is also additional support provided to the communities through outage maps, our CARES Team, and Community Resource Centers.

Outage Map

Effective communications regarding location of PSPS events and restoration times are important to support customers before and during the event. Avista has an Outage Map tool which will provide PSPS specific information regarding the location of the event, and any other pertinent event information. The map will be updated throughout the event to keep customers informed.

CARES Team

Avista has a Customer Service CARES Team which is engaged with medically vulnerable customers and acts as a liaison to support those customers. A PSPS event will have a greater impact on medically vulnerable customers necessitating additional outreach to ensure these customers have a plan needed to be prepared for the de-energization. The CARES Team will provide additional notifications to these customers who are medically vulnerable who rely on 24-hour electricity for medical devices.

Community Resource Centers (CRCs)

In the event of a PSPS, Avista may stand up community resource centers (CRCs) in areas impacted by a PSPS, to be managed by Avista and staffed by Avista Community Response Ambassadors, who are individuals volunteering to help our customers in emergency situations. The services offered at a CRC include electronic and/or medical device charging, internet

access, water, light snacks, and updated real-time information to offset some of the impacts associated with a PSPS event. The CRCs are carefully chosen to be accessible to areas most likely to experience a PSPS.

As we continue to refine the CRC program, fine-tuning locations, resources needed, and Avista staff training. As of year-end, 2025, seventeen Community Resource Centers (CRC) have been identified.

In 2025, the CRC program actively installed to date its first manual transfer switch (MTS), which allows switching portions of the designated CRC location within the building over to a generator if the power is out, allowing the center and community to become more resilient. The team plans to have an MTS installed at every CRC location that currently has no back-up generation by the end of 2026.

In 2026, Avista will continue its outreach and education efforts by collaborating with multiple partnering agencies highlighting both the importance of PSPS and the available resources the CRC program provides for the communities we serve.

9. CONTINUOUS IMPROVEMENT

Avista will strive to continuously improve the effectiveness of this PSPS Plan, which will an annual review and assessment. Avista participates in industry events, table-top exercises, and other functional activities to keep abreast of industry-best practices and lessons learned so that it may adapt its planning and processes as appropriate.

Avista's PSPS Plan is reviewed annually to ensure that it reflects Avista's current policies and implementation procedures with updates, as needed, to the program's organizational structure, training and education, responsibilities, operations, reporting, record keeping, and any other changes. The end products of these reviews are new or revised documents, if necessary, including revised versions of this Plan.

10. FINANCIAL ADMINISTRATION

Avista will track expenses related to PSPS events for WUTC and IPUC reporting and potential recovery. Expense should be tracked for the entire PSPS event (**PSPS Watch** through conclusion of the Post-Incident Review and filing the PSPS event report with the WUTC or IPUC) to include, without limitation, time reporting, equipment and supplies used to set up customer resource centers and provided to customers (e.g., water, ice, etc.).

11. REPORTING

Employees are required to manage information regarding PSPS events pursuant to Avista's Information Retention Policy and underlying standards. Avista will submit reports to the WUTC and IPUC as required.

12. AFTER-ACTION REPORT

An AAR is a structured review or de-brief process used to evaluate the effectiveness of the Plan and potential areas for improvement. This process may be performed after a PSPS event and may be confidential at the direction of Legal to improve the PSPS processes and procedures.

Generally, the After-Action Report could include:

- Explanation of the decision to de-energize, factors contributing to the decision.
- Explanation of how the utility determined that the benefit of de-energization outweighed potential public safety risks.
- Location, time, and duration of event.
- Number of affected customers, broken down by residential, medically vulnerable, commercial/industrial, and others.
- Describe wind-related damage to utility overhead powerline facilities in the areas where power was shutoff.
- Describe customer communications and notifications.
- Whether CRCs were activated, and the location, resources provided and duration of the CRCs.
- Describe the engagement with local and state public safety partners and community partners with regards to advanced outreach/notification during the PSPS event.
- Summarize the number and nature of complaints received as a result of PSPS event and include claims that are filed against Avista because of the PSPS.
- Lessons learned by Avista from the PSPS event.

13. TRAINING

Avista will strive to provide regular training, prior to or shortly after the beginning of wildfire season (annually), to relevant employees in executing this PSPS Plan.

14. EXERCISES

Avista's Director of Wildfire Resiliency in partnership with the Emergency Management Team will exercise this PSPS Plan at least annually using various scenarios and testing of all or any portion(s) of the Plan which may include:

- Improving communication efforts with public safety partners which may include testing text and/or phone alerts
- Testing tactical operational plans such as reporting field observations or positioning employees at manually operated disconnects to test timing for de-energization and field inspections of distribution infrastructure
- Discussing and/or practicing roles and responsibilities of both strategic and tactical operations, including decision-making handoffs and hypothetical scenarios
- Discussing and/or developing re-energization plans
- Testing capacity limits on incoming and outgoing communications systems

Appendix A: Notification Plan

Avista PSPS Notification Plan

Overview

Avista's comprehensive Wildfire Resiliency Plan, launched in 2020, identified four categories of focus: grid hardening, enhanced vegetation management, situational awareness, and emergency response and operations. The goals of the plan have remained consistent:

- 1. Emergency Preparedness** – To recognize wildfire as a recurring threat to infrastructure, communities, and utility customers.
- 2. Protect Life and Property** – To protect physical assets, property, and human lives against the threat of wildfires. To recognize fire potential as a manageable risk element of our operating and maintenance strategies.
- 3. Financial** – To mitigate the probability and consequence of direct financial costs and liability associated with large-scale fire events.

In emergency response and operations, Avista has evolved its strategies over time. Fire Safety Mode now has an extreme setting. Customers on impacted circuits are notified when their protection settings are increased to prepare them for potential outages.

Public Safety Power Shutoffs (PSPS), a temporary, preemptive power shut off to electrical circuits in select areas of our system to keep communities and customers safe, is a new tactic in the plan. Due to the potential hardships that a temporary power shut off may cause, especially to vulnerable individuals and communities, it is critical that in times of extremely high fire risk, Avista provides advanced notice of a possible power shut off. This advanced notice is important to individuals and communities in their own planning in preparation for, and living with, an electrical outage event.

Objectives

To ensure all customers are aware of any potential or planned PSPS event, the objectives of the notification plan are to:

- Develop strategies to ensure timely notifications are made.
- Create clear and consistent messaging based on each event.
- Utilize a broad range of channels, both owned and earned, to communicate.
- Provide updated information when appropriate.

Public Safety Power Shutoffs-Preparation

Before wildfire season begins, we work to educate customers about PSPS and what it means for them and their communities. Corporate Communications implements a campaign to bring awareness to all wildfire resiliency efforts and outage preparedness. We also work in coordination with community outreach efforts to support their initiatives and strategies. The community outreach work is separate from this notification plan, which is more tactical in implementing a PSPS.

Additionally, Corporate Communications creates messaging for every point along the PSPS timeline and gets that messaging pre-approved before heading into Fire Safety Mode. That messaging is then distributed to customer service and community outreach. Only the specifics like date, time and place will need to be updated during an event. Corporate Communications also creates social media graphics for each step and those messages are translated into Spanish, Russian, Ukrainian, Marshallese and Mandarin so community partners can share with those they serve during a PSPS event.

During a PSPS Event

When a PSPS event is being considered, the following strategies and actions will be implemented:

- Communications and Customer Service will be integrated into the Pre-EOP/EOP structure to receive the most up-to-date information and thoroughly understand the potential impact to customers.
- Communications and Customer Service will update pre-approved messages based on the situation.
- For 2025, Distribution Operations will pull the list of customers on impacted circuits and share with all departments that need the information, such as communications, customer service and community outreach.
- Communications will determine executive availability and identify media spokespeople at the executive and management levels.
 - Determine appropriate spokespeople for different events like press conferences, media updates, one-on-one interviews, if needed.
- Communications will develop key talking points for the specific event, including facts, status and steps Avista is taking.
- Communications will consult with Legal and executive leadership to approve any additional messaging.
- Communications will determine most effective media channels.
- Communications will monitor ongoing media and social media coverage and respond appropriately.
- Communications will report out on ongoing communications efforts at all EOP meetings.
- Communications will update messaging as event develops and give updates to customers at a minimum of every 24 hours after PSPS has been implemented.

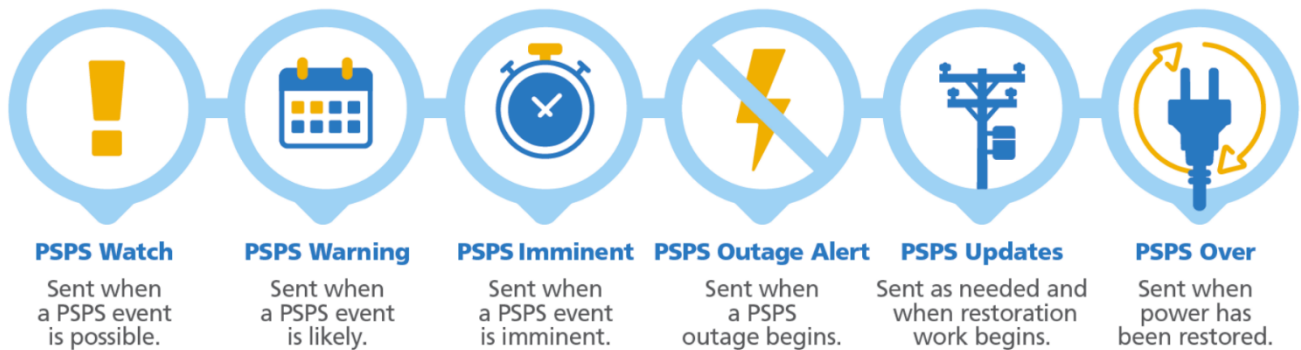
Notification Methods Available:

- Customer email
- Customer IVR callout and global message, initiated by Customer Service with messaging from Corp Comm
- Press release to local media
- Website banner and wildfire/PSPS page updates
- Avista social media channels (i.e. Facebook, X)
- Outage map updated
- Outage text messages sent to customers – method TBD
- Messages amplified by regional partners and community-based organizations

Timeline During Event:

	Watch	Warning	Imminent	Happening	Response	Restoration
When:	48-24 hours	24-4 hours	4-1 hours	During	As soon as it's safe	PSPS is over
What:	PSPS is possible	PSPS looks necessary	Power is being shut off	Power is shut off	Customers will see crews responding	Restoration is complete
How*:	<ul style="list-style-type: none"> Email Outage map Social media 	<ul style="list-style-type: none"> Email Outage map Social media IVR Web banner and webpage updates Text Press release 	<ul style="list-style-type: none"> Email Outage map Social media IVR/global message Web banner and webpage updates Text 	<ul style="list-style-type: none"> Email Outage map Web banner and webpage updates Text Press release 	<ul style="list-style-type: none"> Email Outage map Social media IVR/global message Web banner and webpage updates Text Press release 	<ul style="list-style-type: none"> Email Outage map Social media IVR Web banner and webpage updates Text Press release
Who:	Broad customer list and community partners	Impacted customer list	Impacted customer list	Impacted customer list	Impacted customer list	Impacted customers and broad comms

*Possible channels that may be used depending on situation and timing.



Coordination with Stakeholders:

Notifications to audiences outside of broad customer communications are conducted by the following roles/teams within Avista:

- Wildfire Team
 - Fire Agencies
 - Emergency Medical Response Agencies
 - DNR/IDL
- Regulatory Officer
 - WUTC and/or IPUC
- Tribal Relations Advisor
 - Any impacted Tribal partners
- Regional Business Manager (RBM) Team
 - Local elected/community leaders
 - Red Cross
 - Community-based organizations
- Account Executive (AE) Team
 - Critical infrastructure
 - Commercial customers
- Customer Assistance Referral and Evaluation Services (CARES) Team
 - Medically vulnerable customers
- Corporate Communications Team
 - Avista employees

Notification Cancellation

If conditions change and fire risk has decreased, customers will be informed that Avista will not implement a PSPS event. All relevant communication channels will reflect that new message. If an elevated protection setting is still warranted, customers will be notified of that, as they may still be more likely to experience an outage.