

Wildfire Mitigation Plan



2026

Working to prepare
for and reduce
wildfire risk.



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STATEMENT FROM AVISTA EXECUTIVE MANAGEMENT

This is Avista's 5th year of implementing the Wildfire Mitigation Plan (previously called Wildfire Resiliency Plan). Avista's wildfire strategies are firmly rooted in our 136-year operating history and represent the collective knowledge of Avista employees and fire agency professionals together with assistance from peer utilities and other experts and, most importantly, engagement with customers. This Wildfire Plan builds upon strategies originally developed in 2019 and aligns with the Company's mission to provide safe, reliable, and affordable energy. Avista's Wildfire Plan is designed to reduce fire risk associated with the operation of electric transmission and distribution facilities and reflects our commitment to partner with customers, communities, and those who manage forest landscapes and fight fires, as we all have a role to play in minimizing the risk of wildfire.



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INTRODUCTION

Avista began development of a Wildfire Mitigation Plan in 2019 and published its first plan in June of 2020. The original plan was built upon Avista's operating history responding to and mitigating wildfire activity, and we continue to do so five years later. Our 2026¹ Wildfire Mitigation Plan serves to reaffirm Avista's commitment to reducing wildfire risk to communities and customers, as well as protecting the infrastructure needed to serve our customers. This Plan also describes how the Company implements the program elements to help protect public safety, being mindful of cost while maximizing benefits.

Wildfire Plan Goals

The stated goals of Avista's Wildfire Mitigation Plan include:

1. **Protecting Life and Property** – To protect physical assets, property, and most importantly, human lives, against the threat of wildfires; to recognize fire potential in our operating and maintenance strategies; to take actions to reduce the risk of wildfire related to interaction of Avista's system and the environment; and to minimize the impacts of wildfire to Avista's infrastructure.
2. **Emergency Preparedness** – To recognize and react to wildfire as a recurring threat to infrastructure, communities, and utility customers. To prepare and train for episodic wildfire events and align operating practices with fire threat conditions to help mitigate wildfire risk.
3. **Financial Protection** – To mitigate the probability and consequence of direct financial costs and liability associated with large scale fire events.

Guided by these goals, Avista's Wildfire Mitigation Plan is built on a foundation of proactive strategies. The following section provides an overview of the key programs designed to implement these strategies.

Wildfire Program Elements Overview

Avista's Wildfire Mitigation Plan takes a risk-based, regionally tailored approach to reducing wildfire threats. Developed with input from internal experts and industry peers, the Plan builds on proven practices while incorporating new technologies and strategies to address the unique challenges of our service territory. By determining investment priorities based on information such as mitigation effectiveness, cost-benefit analysis, and wildfire risk throughout the service territory the Plan ensures that mitigation dollars are directed toward the most impactful actions, maximizing safety, and the balance between cost and risk reduction.

We've enhanced existing programs like Vegetation Management and Grid Hardening, and introduced new tools such as LiDAR, satellite imaging, and our Wildland Urban Interface (WUI) map to better

¹ For the 2026 Wildfire Mitigation Plan, Avista is taking a forward-looking approach rather than focusing on past plans. While we have always maintained a mitigation plan, there will not be a separate 2025 plan.

assess and manage risk. These efforts focus on high-risk areas, where 36% of our electric distribution system is located.

Our wildfire-related investments are organized into four key program areas:

- **Situational Awareness** – Leveraging real-time data and predictive tools to monitor fire conditions and support informed decision-making.
- **Grid Hardening** – Strengthening infrastructure to reduce the likelihood of ignition and improve system resilience during wildfire events.
- **Vegetation Management** – Proactively identifying and mitigating vegetation risks near powerlines using both field inspections and advanced remote sensing tools.
- **Operations & Emergency Response** – Enhancing readiness and coordination to respond effectively to wildfire threats and protect communities.

Together, these programs form a comprehensive and proactive strategy to protect our customers, communities, and infrastructure from the growing threat of wildfire.

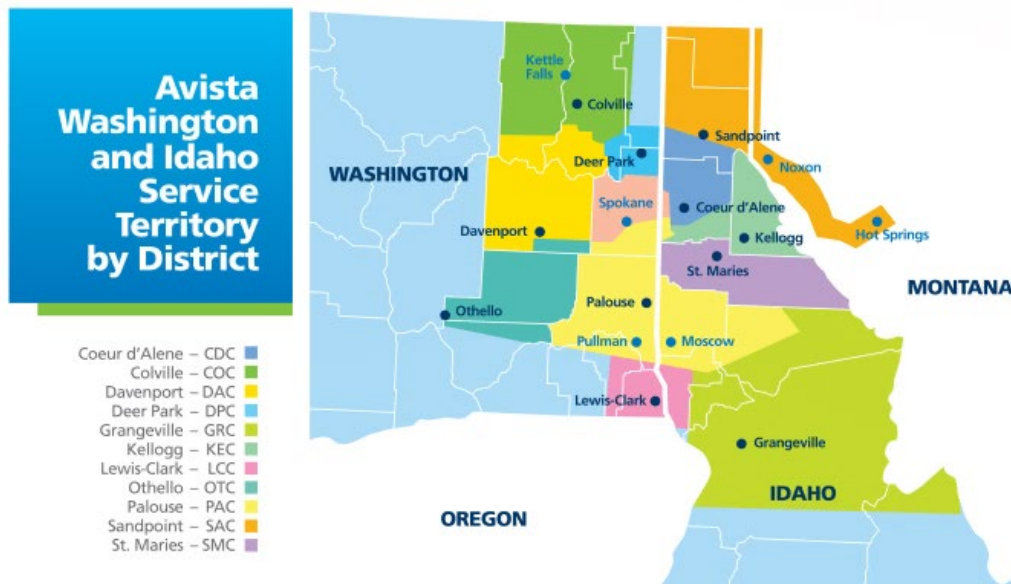
Commission Orders and Recommendations

For detailed Commission Orders and Recommendations, please refer to **Appendix A**.

AVISTA'S WUI RISK AREAS

Wildfire Risk in Avista's Service Territory

Avista serves both electric and gas customers across eastern Washington and northern Idaho, as well as natural gas service only in parts of southern and eastern Oregon. In addition, Avista owns a small portion of electric transmission and distribution infrastructure in western Montana.



Approximately 36% of Avista's electric distribution system is in areas of elevated wildfire risk. These areas fall within the Wildland Urban Interface (WUI) zones where human development meets forested land and where wildfire impacts are most likely. The WUI zone information is defined by state agencies, such as Washington Department of Natural Resources (DNR).

To assess and manage wildfire risk for our distribution system, Avista uses a custom WUI model that incorporates public and proprietary data, including vegetation, topography, weather, historical fire activity, and infrastructure location. Risk levels are categorized into four tiers (WUI 0-3), ranging from low to extreme, and are reviewed annually.

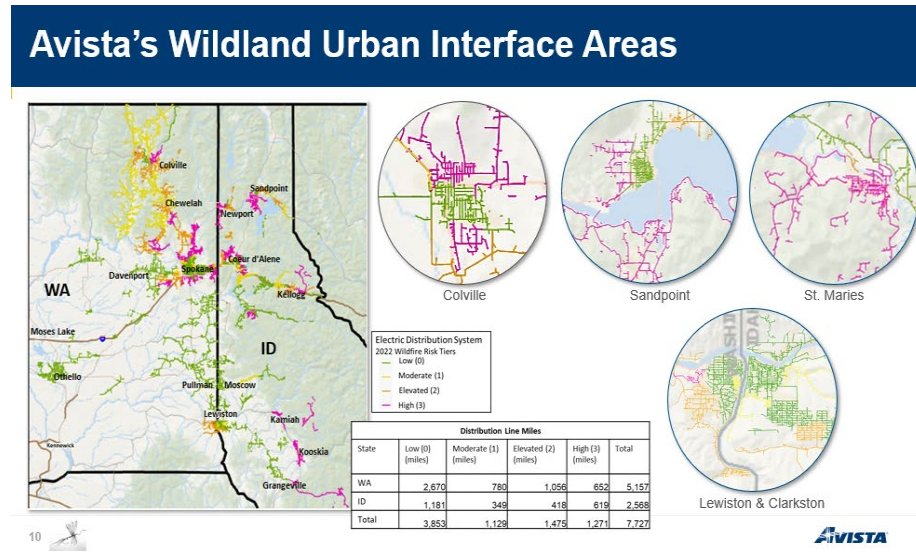
Approximately 62,600 customers (about 15% of Avista's electric customer base) reside in these higher-risk zones. This model helps prioritize mitigation efforts such as grid hardening and vegetation management, ensuring resources are focused where they can have the greatest impact.

Avista currently identifies risk on the transmission system by completing 100% annual inspection and follow up remediations. Before wildfire season 2026, with the adoption of Avista's new risk modeling system (ATS), the risk will be identified on both the transmission and distribution down to the structure level.

Distribution Line Miles												
State	Low (0)		Moderate (1) Miles		Elevated (2)		Extreme (3)		WUI 2 & 3		Total Miles	
	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%	Miles	%
WA	2,670	35%	780	10%	1,056	14%	652	8%	1,708	22%	5,158	67%
ID	1,181	15%	349	5%	418	5%	619	8%	1,037	13%	2,567	33%
Total	3,851	50%	1,129	15%	1,474	19%	1,271	16%	2,745	36%	7,725	100%

Data presented is based on Avista's 2023 WUI area assessment.

Avista has provided our WUI map technology (most of it based on public information combined with internal expertise) to other utilities, as there is a desire to share information, best practices, new tools, etc., in the wildfire mitigation area where possible.



AVISTA'S WILDFIRE RESILIENCY PROGRAM OVERVIEW

Understanding where wildfire risk is greatest, specifically in the Wildland Urban Interface, allows Avista to focus its mitigation efforts where they matter most. With this risk-based foundation in place, Avista developed its first Wildfire Mitigation Plan in May 2020, following 18 months of collaborative planning, analysis, and stakeholder engagement.

The wildfire program is designed to balance wildfire risk and cost of mitigation while also taking into consideration system reliability impacts and ensuring that mitigation efforts don't disadvantage communities that may be more rural, with lower income and limited firefighting resources. To better serve these areas, Avista has integrated tools like the USDA's Wildfire Risk to Communities map, which helps assess both the likelihood and potential impact of wildfire on people and property.

The following sections outline the key programs that make up Avista's Wildfire Mitigation Plan and how they are being implemented to protect customers, communities, and critical infrastructure.

SITUATIONAL AWARENESS

Using Tools and Technology to Reduce Wildfire Risk

Avista’s Situational Awareness program is designed to monitor wildfire risk in both the short and long term. We use a combination of tools to identify high-risk areas and anticipate when conditions may require action, including our WUI map and Fire Weather Dashboard, and in 2026 our new Fire Risk Model. Local weather stations and fire detection cameras provide real-time insights into on-the-ground conditions, helping us respond quickly and effectively.



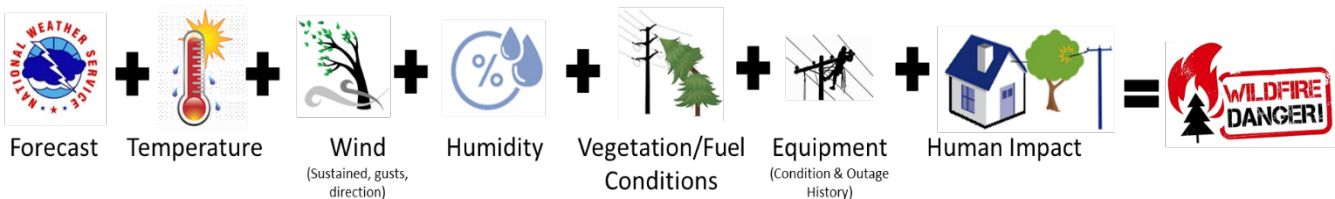
These technologies are fully integrated into our wildfire operations and support informed decision-making throughout the fire season. We also coordinate with neighboring utilities to stay aware of system changes, such as de-energization events, which could impact our operations.

Fire Weather Dashboard

Monitoring Weather and Fire Risk

Launched in 2020, Avista’s Fire Weather Dashboard has been a dynamic modeling tool that combines National Weather Service forecasts with Avista’s infrastructure data to assess wildfire risk across our service territory. It generates a Fire Risk Index for each electric circuit, factoring in weather conditions (e.g., wind, humidity, temperature), vegetation, topography, and historical system performance to identify when and where wildfire risk is elevated.

The Dashboard is updated every two hours following the updated weather forecasts during fire season and provides district-level and systemwide alerts, helping operators make informed decisions around fire risk and reliability risk. It also tracks active fires and forecasts potential impacts to infrastructure enabling proactive mitigation.



Fire Risk Index

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, the Severe Fire Danger Index (SFDI), 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 ≥7.0:** Extreme risk of both outage and fire spread.

The FRI has been used to support operational decision making, including activating extreme Fire Safety Mode when the FRI reaches 5.5 or higher, or 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 new risk model, as covered in the following section.

Evolving Risk Assessment: From Fire Risk Index to Advanced Modeling

While Avista’s Fire Risk Index (FRI) has been a valuable, data-informed tool for wildfire risk assessment during the 2024 and 2025 fire seasons, we are advancing our methodology in 2026. The FRI will be replaced with a next-generation wildfire risk modeling framework that builds on its foundation and incorporates additional data layers, such as asset fragility, ignition probability, fire consequence modeling, and economic impact analysis.

This enhanced tool will support more precise, scenario-based decision-making for Fire Safety Mode settings, Public Safety Power Shutoffs (PSPS), and other mitigation strategies. It will also help quantify the cost-benefit analysis of various wildfire solutions, such as grid hardening and vegetation management. The new model is currently in development and is expected to begin delivering insights in early 2026. These enhancements will be reflected in the next version of the Wildfire Mitigation Plan.

Avista Wildfire Cameras 2025

WASHINGTON

- Colville Mountain
- Lilienthal Mountain
- Scoop Mountain
- Stanger Mountain
- Saddle Mountain East
- Devils Gap
- Krell Ridge
- Mount Spokane
- Steptoe
- Layton Hill
- Coulee City
- Teel Hill

IDAHO

- Gold Mountain
- Gold Cup Mountain
- Hoodoo Mountain

Wildfire Identification Cameras

Wildfire identification cameras are instrumental in quickly identifying a fire start as well as its precise location. Early detection of ignition increases the likelihood of timely containment and suppression of wildfires, minimizing any impacts to utility infrastructure and most importantly, the communities we serve. This technology dispatches resources directly to the latitude and longitude of the smoke so firefighters do not have to search for the fire, saving valuable time.

Avista has contracted with Pano AI to install and monitor cameras in designated areas within our service territory.² Pano AI provides camera surveillance, 24-hour monitoring, and computer machine learning to detect smoke, and potentially the start of a fire. These cameras offer a full 360° view captured every two minutes. If the system detects a smoke plume, Pano staff are alerted. If the smoke plume is verified as a fire start, first responders and utilities are notified and firefighters are sent directly to the site. Avista is partnering with professional firefighters to identify key sites in our service territory for camera installation. These agencies have full access to the cameras in their jurisdictions. Avista dispatchers will be notified as well to allow them to take action if it appears that our infrastructure may be impacted.

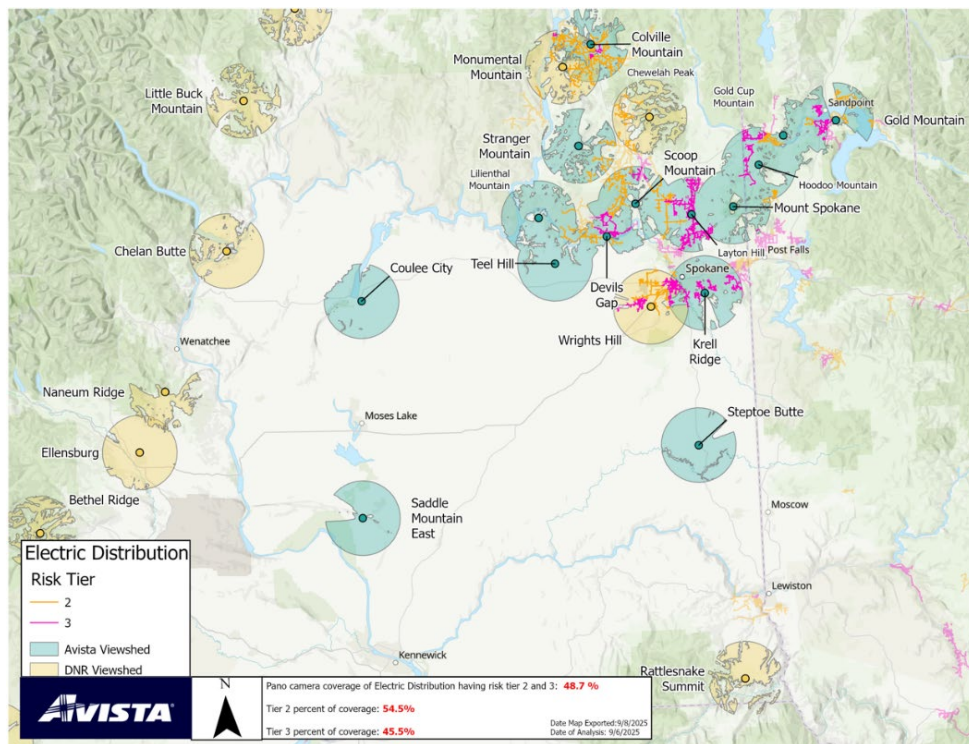
In 2024 Avista installed ten of these cameras; seven in Washington and three in Idaho, and, installed another five cameras in Washington in 2025. In 2026, Avista is installing 10 additional cameras with plans for more in subsequent years. Sites are selected in high-risk areas, locations with clear viewsheds, and factors such as accessibility and power availability, with the goal of ensuring the cameras can capture early fire detection and provide comprehensive coverage up to ten miles away. The cameras are located on existing towers if possible, typically cell, communications, or Avista towers based on providing an optimal view of the area. Other areas require right-of-way permitting or agreements with landowners. If located on a non-Avista structure, Pano AI secures a lease to enable installation. Other factors for



² Pano AI is respected across the industry. Their customers including Portland General Electric, Puget Sound Energy, and Xcel Energy as well as fire professionals such as the Washington DNR, the National Park Service, Idaho Dept. of Lands, Spokane Tribes, U.S. Forest Service, and over 1,600 additional agencies. <https://www.pano.ai/fire-professionals>

wildfire camera coverage include areas with dense vegetation or human activity that could lead to fire, areas that have experienced past fire activity, and those with clear, 360-degree visibility to the surrounding area (usually high points such as mountaintops or high ridges) without obstructions such as trees or buildings. The cameras must be accessible for installation and maintenance.

Avista works with our agency partners, primarily the Washington Department of Natural Resources (DNR) and the Idaho Department of Lands (IDL) to ensure that we are coordinating with their existing or planned sites and that the new sites we are adding work effectively for them. Avista also



coordinates with the Idaho Fire Camera Interoperability Committee and Washington Wildfire Detection Coordination Group, in coordination with the IDL and the DNR, to help determine the best locations. These are groups formed of Federal, State, County, private, and industry participants working together to obtain best coverage and coordinated installations across large areas.

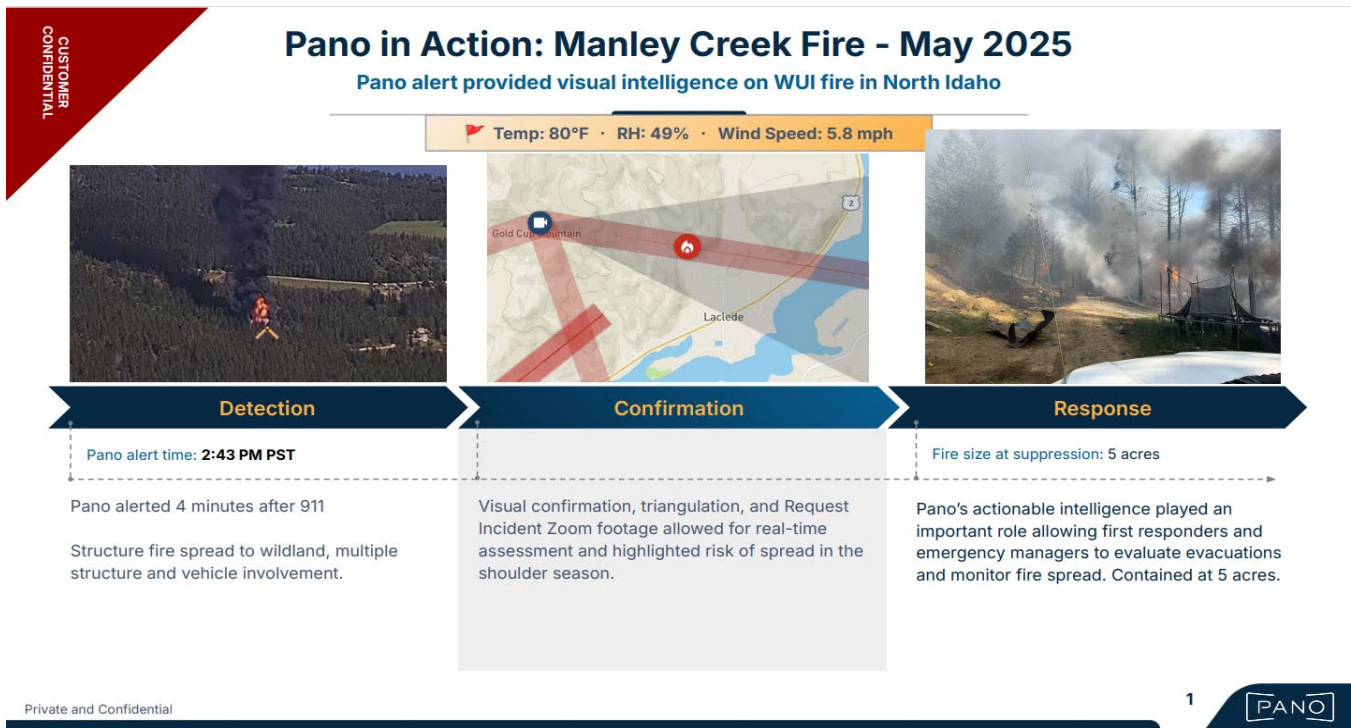
Avista and WA DNR Wildfire Cameras as of 2025

As mentioned, we share the camera view and alerts with them as well as many others. Currently we have approximately 340 user accounts that can access Avista cameras, including agencies, government personnel, dispatch centers, and emergency management organizations, enabling these entities to effectively utilize our cameras. Pano AI continues to onboard Fire Response/Land Management agencies to have access to our camera feeds.³ All of the Pano AI camera owners share access to their camera feeds, enabling all of us to have a broad and comprehensive network. In 2025, Fire Response and Land Management agencies viewed our cameras over 54,000 times.

³ Users include agencies across eastern Washington and Northern Idaho including the West Pend Oreille, Selkirk, Schweitzer, Northside, Colville and Spokane Valley and County fire departments, the cities of Spokane and Colville, Washington DNR, county emergency management agencies and dispatch centers, the U.S. Forest Service, and Tribal agencies (for now the Spokane and Colville Tribes).

Currently, the camera network covers 21% of our transmission lines and 51% of our distribution high fire areas (WUI Tier 2 and Tier 3 areas). We prioritize high-risk zones that encompass numerous customers and valuable assets. In 2024, Avista cameras alerted over 1,400 wildfire incidents, many of which were first reported by the camera network.

In 2025, our cameras alerted to a fire near Priest River, Idaho, notifying firefighters who immediately took action to prevent the fire from spreading. The early notification also allowed nearby residents to evacuate safely. Additionally, we had an example in 2024 as well, where early detection technology played a critical role in identifying a wildfire threat and enabling a swift response.



Local Weather Stations

Weather stations enhance a utility's ability to know what the situation is for a specific area. Weather stations can monitor relative humidity, temperatures, wind speeds and gusts, all key factors in fire prediction, in real time. Regional weather stations better inform operational decisions, supplementing the information from the National Weather Service. The granular data provided by a local weather station helps the utility gauge fire behavior, allowing proactive response to a threat, especially as they consider a Public Safety Power Shutoff. The stations can also monitor conditions around powerlines and substations, keeping an eye on increasing risk levels based on local weather behavior and notifying when conditions have subsided so crews can begin restoration if needed.

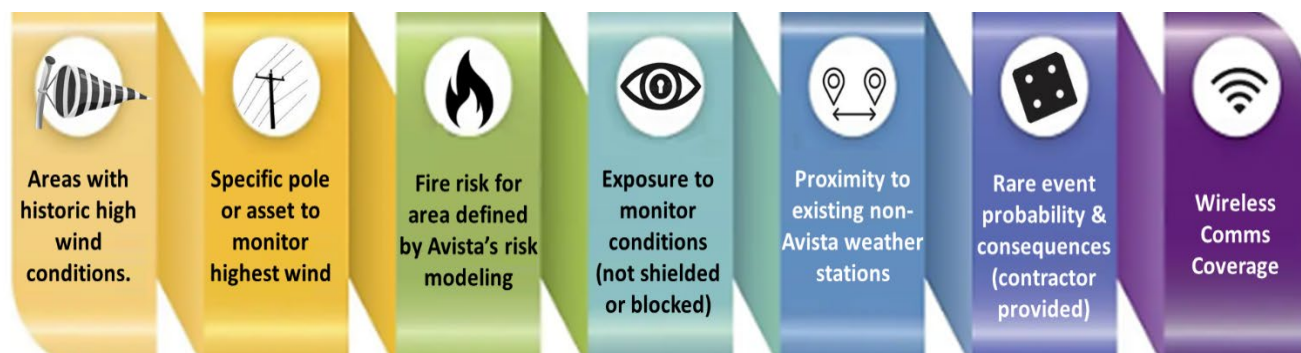


*Avista weather station in the
Spokane Valley area*

Avista is striving to achieve improved situational awareness of real-time weather conditions within its service area and obtain site specific forecasting of weather events. Strategic selection of sites to install weather stations, reliable and proven sensors arrays, communication methods with the stations, maintenance and service of stations (including access), and pertinent forecasting provide the information for an accurate risk model and allow decisions to be made in a beneficial and timely manner. Consideration for station placement considers, but is not limited to the following:

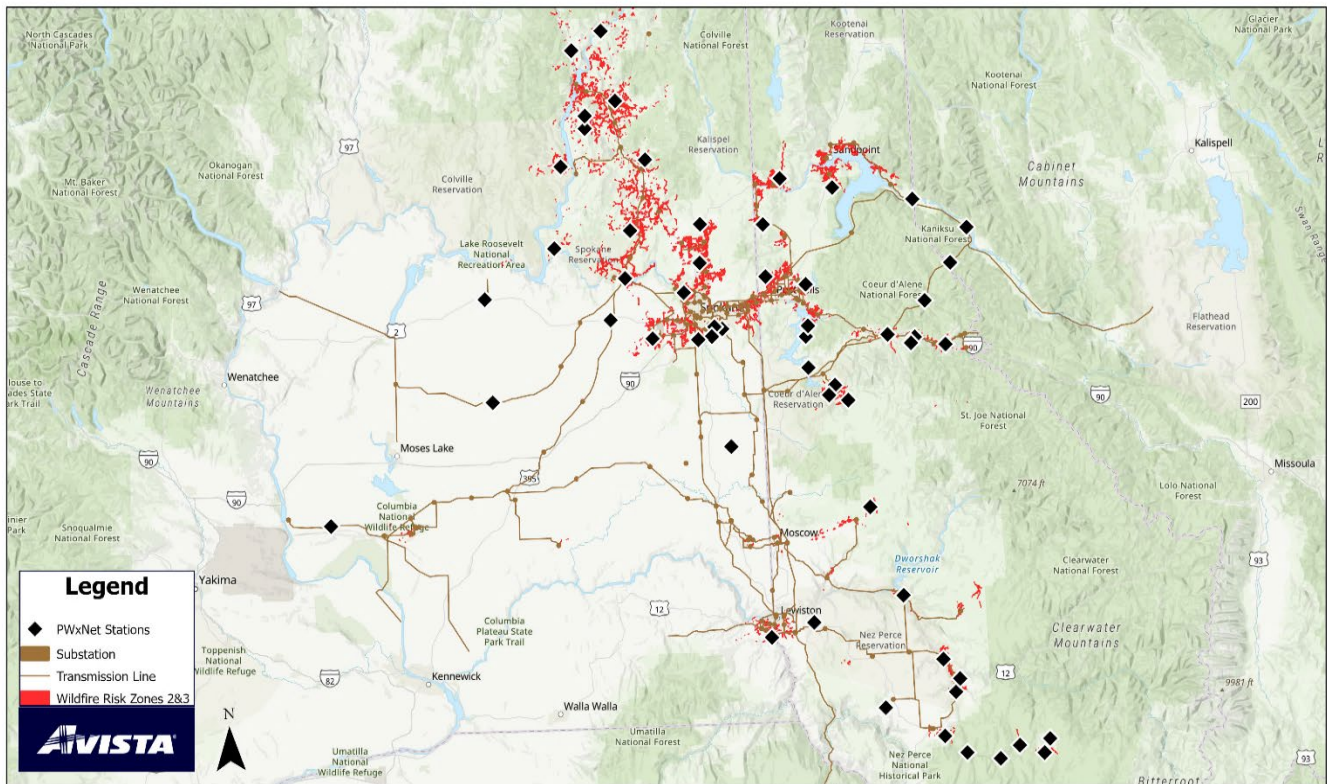
1. **Areas with historically high wind conditions.** Providing better data for areas where we have routinely implemented elevated protection settings. The weather stations will help guide when to elevate and when to return to normal operations. These real-time observations also help ensure safety of our personnel who are patrolling and/or repairing the lines.
2. **A specific pole or asset** that allows us to monitor the highest winds, keeping in mind that the higher the winds, the higher the risk. We also look for accessibility to a pole or asset for installation and future maintenance of the weather station.
3. **Fire risk for the area.** We prioritized higher risk areas as defined by the Dashboard and our WUI map. Better forecasting for these areas and real-time observations provide information needed for better and more timely decisions.
4. **Exposure that allows monitoring conditions.** We looked for a specific site selected to obtain the best data, free of obstructions that would limit or affect the data or communications.
5. **Proximity to existing weather stations.** We want to play a useful part in creating a more complete network of weather data for all interested parties, to supplement not duplicate.
6. **Rare event probability and consequences.** We kept in mind gathering data in *all* areas, not just the most likely to experience an issue. An unexpected or rare weather event can have a significant impact regardless of wildfire risk tiers.

7. **Communications.** This includes coverage, right-of-way and permitting, impacts to local entities, and availability of Avista communications or wireless coverage.



Criteria for selecting weather station locations

We have also contracted with meteorologists for site-specific forecasting during times of elevated fire danger. Avista is continuing to work toward installation of local weather stations in key areas of our service territory. We estimate completing installation of 60 weather stations in 2025. Weather station location sites across our service territory were developed in combination with our weather station provider, Weathernet. The Company also identified 20 additional sites in case any of the original sites were not feasible. Site selection was based upon Avista's utility pole placement and Weathernet's industry experience along with the elements described above. Avista will be adding an additional 78 weather stations in 2026. The data from these weather stations will be made available to the public and other interested parties.



Map of the first 50 proposed weather stations sites for installation in 2025. The brown lines indicate Avista's grid

Prior to having weather stations installed, Avista deployed several handheld Kestrel weather meters to field personnel during the 2024 fire season in order to gather real-time weather information. Crews were able to test the process of weather data collection and how it is relayed to Operations and key personnel. These meters were used during Avista's 2024 PSPS event to provide weather updates from the location of the outage to Operations, the Wildfire and PSPS teams, and to the Emergency Operations team that was managing the PSPS event. In 2025 these handheld meters were used again to monitor weather conditions near locations experiencing PSPS events. Based on the success of this deployment, these meters will continue to be used in areas that do not have weather stations, and more meters have been provided to line crews in additional areas of our service territory.

Situational Awareness Budget & Targets

For detailed budget and target information related to situational awareness programs, please refer to **Appendix B**.

GRID HARDENING & INSPECTIONS

Strategies for Line Design, Inspection and Upgrade of Equipment to Reduce Wildfire Risk

Powerline outages can result from uncontrollable events such as storms, high winds, lightning, and vehicle collisions. However, upgrading conductors and equipment can significantly reduce outage frequency and the risk of spark ignition, offering a cost-effective mitigation strategy.

Grid hardening represents the largest capital investment in Avista's Wildfire Mitigation Plan—approximately 90% of total wildfire-related expenditures. While Avista has long-standing programs for replacing poles, conductors, and equipment, these efforts have traditionally focused on reliability and condition-based maintenance. Wildfire grid hardening shifts the focus toward reducing spark ignition potential and enhancing system resilience during fire and other environmental stressors.



Hardening Strategies. Wildfire mitigation hardening strategies include:

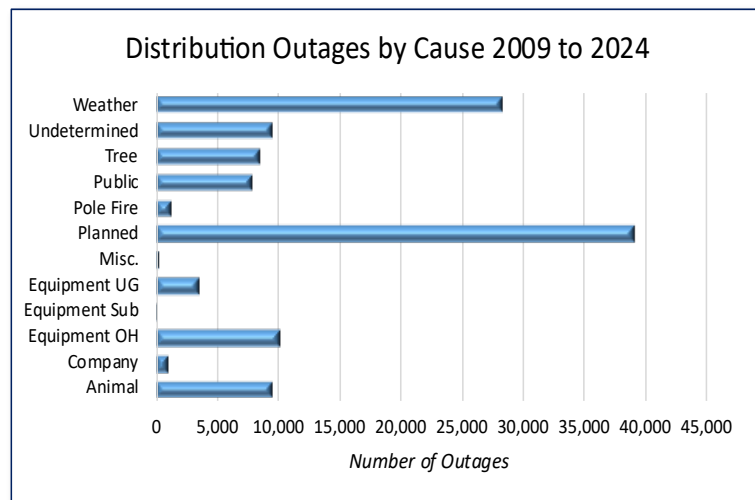
- Rebuilding lines with hardened designs
- Using steel poles on transmission projects and high value distribution pole replacements
- Undergrounding select distribution segments
- Installing covered conductor
- Replacing wood crossarms with fiberglass
- Deploying automated protection devices (e.g., reclosers)

These upgrades improve system durability against high winds and fire exposure, directly supporting customer safety and reliability.

Distribution Grid Hardening

Avista's Distribution Grid Hardening Program aims to reduce equipment failures, such as downed conductors and broken crossarms, particularly in high fire risk areas identified by our WUI Tier map. The new risk modeling will also include capabilities to identify risk areas.

Distribution lines experience line faults at a rate over 56 times higher than transmission lines.⁴ With approximately 2,750 miles of distribution lines in high fire threat areas, the scale of hardening is significant. Since 2020, Avista has hardened about 200 miles of distribution lines annually.



Historic distribution outages

Going forward, grid hardening efforts will focus on three key areas:

1. Undergrounding – selectively burying lines in strategic locations.
2. Covered conductor– installing insulated conductor in strategic locations.
3. Overhead upgrades – replacing wood crossarms with fiberglass, upgrading small conductors, installing wildlife guards and lightning arrestors, using steel poles at critical spans, and replacing obsolete equipment.

Additional measures include eliminating open wire secondary conductors, using wedge-connected stirrups for stronger hot tap connections, and reinforcing/replacing spans over highways and rivers with metal poles for added resilience.

These upgrades enhance system resilience, reduce spark ignition risk, and improve overall reliability for customers.

3rd Party Cost-Benefit Analysis for Avista Undergrounding

In 2023, the Idaho Public Utilities Commission directed Avista to establish a formal process to evaluate the undergrounding of distribution lines as part of wildfire mitigation efforts.

Avista initiated a formal process to evaluate undergrounding distribution lines for wildfire mitigation.

⁴ Based on Avista's Outage Management System data from 2009 to 2024.

This included establishing project criteria, a selection methodology, and conducting a cost-benefit analysis for both completed and future projects.

Avista engaged Exponent Consulting, an independent firm specializing in engineering and economic analysis, to assess undergrounding feasibility in high fire risk areas. Using Avista's Wildland Urban Interface (WUI) map and internal prioritization tools, Exponent analyzed segments of approximately 195 feeders.

Cost Benefit Key Components	Description
Safety	Loss of life and injuries to people & property as impacted by changes in wildfire risk associated with the undergrounding project.
Reliability	Customers impacted by the project in terms of outage hours.
Financial	Direct costs of the project including both executing the project and continuing maintenance costs.

Key areas of Exponent's evaluation

Their evaluation focused on three key areas:

1. Safety – Economic value of reducing injury and loss of life.
2. Reliability – Financial impact of service outages.
3. Cost – Implementation, outage-related, and ongoing maintenance costs.

Exponent calculated benefit-cost ratios (BCRs) for each project, with values ranging from 0.06 to 11. A BCR above 1 indicates benefits outweigh costs. While some projects scored below 1, the analysis emphasized that even low-frequency events like wildfires can have catastrophic consequences, warranting consideration beyond strict financial metrics.

Going forward, Avista will incorporate scenario-based risk modeling through Aerospace Technical Services (ATS). This model will include wildfire consequence estimates (structures and acres burned, lives lost), ignition probabilities, and pole fragility data. It also considers broader impacts such as aesthetics, construction risks, and economic effects on customers.

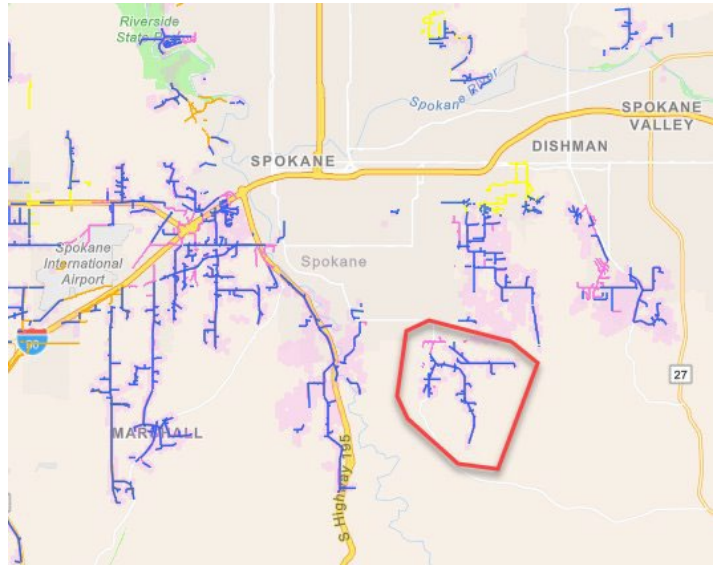
Impact	Calculation Values
Reliability Benefits	Ranges of outages with and without undergrounding lines. Use of historical outages specific to the feeder including customer counts and Avista-specific customer interruption costs.
Direct Costs	Changes are estimated based on historical costs of outages combined with the expected change in outage rate.
O&M Costs	Calculated based on historical Avista data on maintenance costs for overhead & underground feeders combined with the length of the feeder to be undergrounded.
Cost Reductions	Apportioned expected annual losses from FEMA's National Risk Index to utility-caused fires and to specific feeders based on wood pole and tree fall failure rates on that feeder.
Project Costs	Costs were provided to Avista including labor, civil construction, truck/lateral build, automation, and wreck out costs.

Together, these tools provide a comprehensive framework for prioritizing undergrounding projects where cost effective and enhancing wildfire mitigation strategies across Avista's distribution system.

For additional details on Avista's third-party undergrounding project, refer to **Appendix C**.

Avista's Undergrounding Project

Avista selected a feeder located in southeast Spokane, WA, within a WUI Tier 3 high-risk fire zone, to underground. This feeder is included on Avista's "risk list" and was transitioned into Fire Safety Mode multiple times in 2022 and 2023, underscoring its potential high-risk status. Serving approximately 190 customers across a semi-rural region, the feeder comprises 11 miles of two- and three-phase laterals. This project will allow us to evaluate the feasibility of undergrounding as a wildfire mitigation tool.



2025 underground project feeder

Faults are an inherent part of overhead distribution systems, often caused by contact by trees, animals, or other objects. These faults can result in arcing or downed conductors, which may lead to spark events. Traditional utility practice relies on bare wire and protection systems that detect and isolate faults by deenergizing circuits. However, this reactive approach can still allow arcing before isolation occurs, posing wildfire risks.



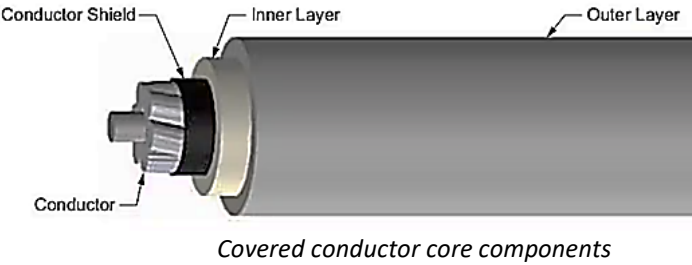
Covered Conductor is heavier and more robust than traditional bare wire.

One strategy Avista is exploring to reduce spark event potential is equipment upgrades such as covered conductor. Covered conductor is insulated to substantially reduce the likelihood of faults from external contact—reducing outages caused by vegetation, animals, and public interference.

While covered conductor offers increased resiliency, it comes with trade-offs:

- **Cost:** Our studies have shown that overhead grid hardening treatments cost on average \$90,000 per mile compared to covered conductor installations averaging \$155,000 per mile.
- **Weight & Wind Load:** Heavier and larger diameter may require pole upgrades and can increase wear.
- **Operational Considerations:** Occasional instances of energized wire on the ground without outage detection.

Despite these challenges, a third-party study by Exponent Consulting found that covered conductor significantly reduces faults from vegetation, animals, and public contact, and lowers phase-to-phase fault risk.



Avista’s Covered Conductor Project

Avista selected a 2.5-mile lateral section of a feeder near Springdale, Washington to install covered conductor. Construction was completed in late fall of 2025. This is the first covered conductor project in Avista’s history. The team is learning a great deal from the experience, including the need for extensive pole replacements as well as a requirement for more poles as they must be placed closer together, both due to the additional size and weight of the wire. Through this cost and feasibility study, we obtained a deeper understanding of the unique challenges involved in constructing covered conductor lines. This included learning about the need for specialized tools and equipment, updated maintenance protocols, and potential supply chain constraints. These insights have provided us with more accurate data on actual cost per mile, allowing for a clearer and more informed evaluation of the cost-benefit relationship of implementing covered conductor solutions based on real-world experience.



Wood Pole Inspection

Pole Inspection Process. Avista’s Wood Pole Management (WPM) Program is designed to inspect and maintain distribution and transmission assets with the primary goals of reducing fire risk, improving safety and reliability, and minimizing unplanned customer outages.

Inspection Methods. The inspection process identifies issues such as:

- Insect, animal, lightning, or fire damage
- Decay, mechanical damage, and equipment failure (e.g., leaking transformers)
- Unauthorized attachments, broken guy wires, grounding issues, and soil concerns

Distribution Pole Count	
Idaho	84,458
Montana	85
Washington	151,116
Total	235,659

Avista distribution pole count by state

Inspections include:

- Visual assessments of poles and attached equipment
- Intrusive testing, such as boring at or below groundline to detect decay, the leading cause of pole failure
- Evaluation of associated components like crossarms, cutouts, transformers, grounds, and guy wires



Wood Pole Inspection

Distribution Scope and Cycle. Avista's Distribution WPM covers overhead electric facilities in Washington, Idaho, and Montana. With around 230,000 distribution poles in the system (approximately 66% in WA, 34% in ID, <1% in MT), the program operates on a 20-year cycle. To maintain this schedule, around 11,400 poles (5%) are inspected annually, along with necessary follow-up work.

In addition to poles, visual inspections include transformers, cutouts, insulators, wildlife guards, lightning arrestors, crossarms, guying, and grounding. Assets needing immediate attention are flagged for urgent replacement; other work is completed when the full feeder is addressed. The program complies with the National Electrical Safety Code (NESC) and Avista's internal standards.

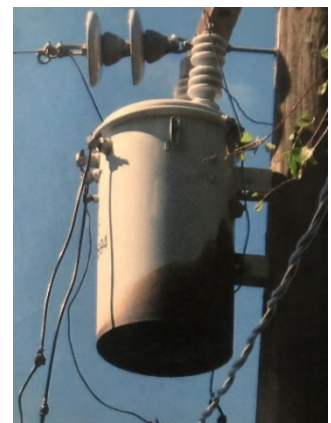
Assets Identified for Replacement, and Daily Routine Operations.

Pole replacements are based on inspection results. Attachments (e.g., transformers, cutouts, crossarms) are replaced if flagged during inspections, even if the pole itself remains. Field crews also identify and address asset issues outside the inspection cycle.

Prioritizing the Work.

Work is prioritized based on:

- Risk level
- Customer impact
- WUI zone designation
- Inspection date

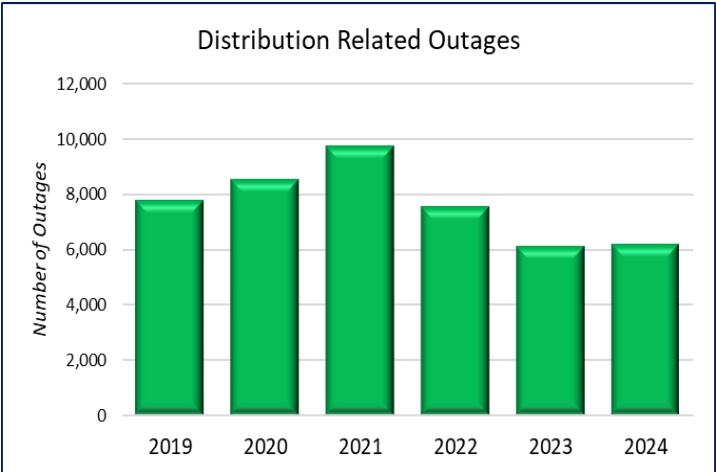


Leaking transformer

Line crews, dispatchers, engineers, project coordinators, and area offices collaborate to assess and schedule work. Imminent hazards, such as split crossarms, frayed conductors, or thin shell thickness, are reported for immediate remediation.

Measuring Success. Avista focuses on wildfire-related metrics that reflect long-term system trends rather than short-term or end-of-year results, which can be heavily influenced by variable factors—most notably weather. Significant changes in these metrics will take time, as they depend on the gradual replacement of thousands of aging components, such as crossarms and other distribution infrastructure. These programs are not designed for completion within a single year but are ongoing efforts that deliver continuous improvement, especially in grid hardening.

To evaluate the effectiveness of grid hardening, Avista tracks outage-related metrics. For example, reductions in animal-related outages demonstrate the value of installing wildlife guards, as evidenced by downward trends in our outage data.



Distribution outages since the Wildfire Plan began in mid-2021

Avista also tracks ignition events where, if a fire is observed when field personnel respond to an outage, the field personnel will report to a Distribution Operator that a fire has occurred near our facilities. This will trigger the Distribution Operator to open a screen in ADMS to note the location of the incident to the nearest pole, the size of the fire in acres, if police or fire are present or on standby, the severity of the damage, and the customers impacted. Previously the data was not captured as accurately based on the ability of the outage management tool.

Transmission Grid Hardening

Since 2006, Avista has systematically replaced wood transmission poles with steel, primarily during rebuilds or when poles are damaged or fail. Given that transmission poles are more vulnerable to fire and significantly more expensive to replace, this effort now includes targeted wildfire mitigation strategies:

- Steel Pole Replacement in high vegetation areas within WUI Tier 2 and 3 zones.
- Fire Mesh Wrapping of wood poles in low vegetation, high fire-risk areas like deserts and cropland.
- Crossarm and Equipment Repairs identified through annual inspections.

Transmission Pole Count	
Idaho	14,021
Montana	1,741
Washington	20,011
Total	35,773

Avista transmission pole count by state

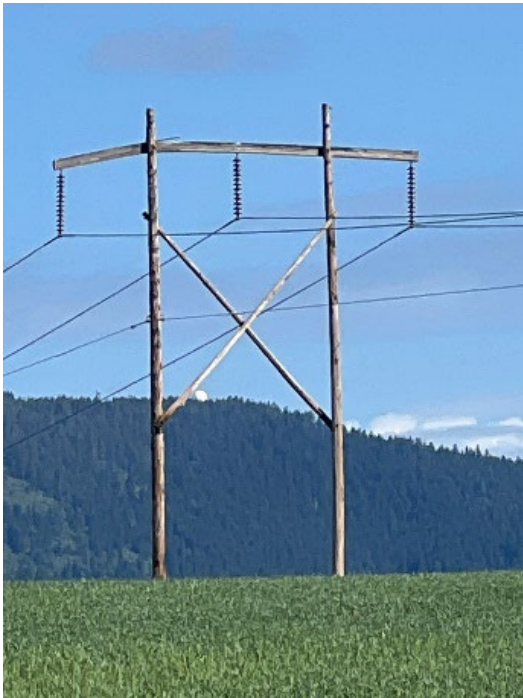
Inspection Process and Schedule. Avista inspects nearly 38,000 transmission poles on a 15-year cycle. Ground inspections assess pole integrity through visual checks and drilling to measure shell thickness. The poles are annually inspected using aerial and drone-based inspections. Steel poles are inspected for

corrosion and foundation stability. Aerial inspections—conducted annually before fire season—identify structural defects, vegetation risks, and other hazards. Drones are deployed for detailed follow-ups and are being integrated into a more prescriptive inspection model.

LiDAR technology has been added to enhance vegetation risk detection and identify issues like corroded hardware, ground profile changes, unauthorized attachments, and thermal anomalies.

Inspection Standards. Avista follows federal and industry standards, including NESC, FERC FAC-003-4, and NERC FAC-501-WECC-2, which require annual inspection of 100% of the interconnected

transmission grid. Poles with less than 3" shell thickness are further evaluated to see if the pole could be trussed. If there isn't sufficient remaining wood where the pole is banded, then it may be replaced. Those with at least 5" shell thickness and no rot may be reinforced.



Broken crossarm

Issues found during inspections are categorized:

- Urgent – Immediate repair or temporary fix.
- Remediation Required – Scheduled repair within 12 months.
- Monitor – Non-critical, tracked for future action.

All findings are logged in Avista's GIS and asset management systems, feeding into a decision matrix that

prioritizes repairs based on risk, WUI zone, customer impact, and crew availability.

Measuring Success. Transmission outages have declined since the Wildfire Mitigation Plan began in 2021, though weather remains a major factor. Steel poles have proven effective in allowing fires to pass without destroying infrastructure, reducing outage duration and improving resilience. Fire mesh wraps offer a cost-effective alternative in certain areas—approximately \$200 per pole versus \$40,000–\$100,000 for steel replacement.



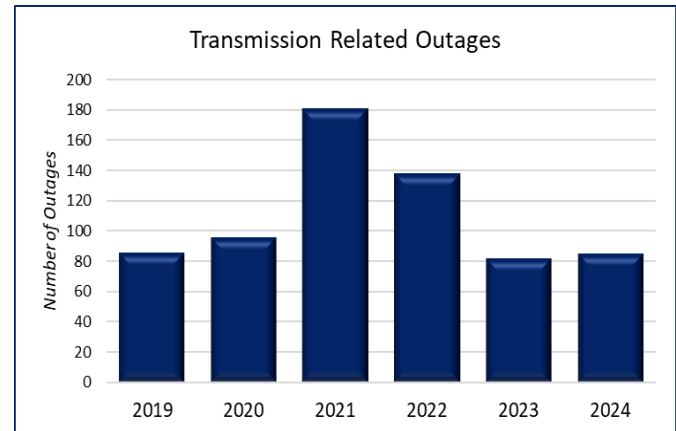
Transmission pole inspection

Transmission Steel Pole Replacement

Since 2006, Avista has steadily replaced wood transmission poles with steel, and this effort continues today. Currently, about 43% of Avista's transmission poles are steel. A key objective of the Wildfire Mitigation Plan is to accelerate this conversion in high fire-risk areas to improve system resilience.

Steel poles offer significant advantages:

- Fire Resistance – They withstand wildfire exposure better than wood.
- Enhanced Reliability – Less prone to failure from wind, lightning, insects, and birds.
- Structural Integrity – They resist cascading failures (domino effect) and reduce the risk of wire-down ignitions.



Transmission outages since the Wildfire Plan began

Each year, Avista sets replacement targets based on budget and prioritizes poles in WUI Tier 2 and 3 zones, incorporating historical fire data and topography into the decision-making process. In areas with low vegetation, fire-resistant wraps may be a more cost-effective alternative to steel replacement.

By layering fire risk, terrain, and vegetation data, Avista ensures its steel pole replacement budget is strategically allocated to areas with the highest wildfire vulnerability.

Wood Pole Fire Resistant Mesh Wrap

To protect transmission poles in fire-prone grassland areas, Avista adopted a fire-resistant mesh wrap developed in collaboration with Southern California Edison. The wrap uses a heat-activated chemical on a steel mesh substrate that expands during a fire to seal and shield the pole.



This solution is deployed at the base of wood transmission poles in low-vegetation, high fire-risk areas (WUI Tiers 2 and 3), where replacing poles with steel may not be cost-effective. In contrast, steel poles are prioritized in areas with taller vegetation and greater flame height potential.

Avista has found mesh wraps to be an effective and economical way to protect infrastructure from ground-level fires while maintaining system reliability.

Grid Hardening Budget & Targets

For detailed budget and target information related to Grid Hardening programs, please refer to **Appendix B**.



*Installing fire resistant
mesh wrap*

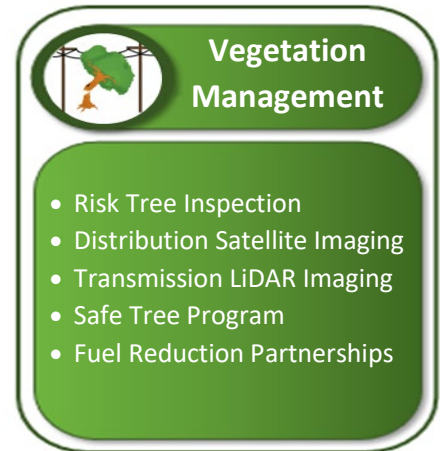
VEGETATION MANAGEMENT

Practices and Tools to Reduce Vegetation Contact with Power Lines

Effective vegetation management is essential to maintaining safe and reliable electric service and reducing wildfire risk. Avista has a long history of using industry-best practices, including cycle-based tree trimming, risk tree removal, herbicide application, and the use of tree growth inhibitors.

In recent years, Avista has expanded its vegetation management efforts to address wildfire risk more directly. These changes include:

- Risk Tree Inspection Cycles: Annual inspections of transmission lines as well as our distribution lines that are in high fire risk areas.
- Risk Tree Removal: Trees identified as dead, declining, or found to be significantly structurally defective are scheduled for removal.
- Advanced Technology: Use of LiDAR for high-precision transmission line assessments and satellite imagery for distribution system monitoring, enabling early detection of clearance issues and vegetation encroachment.
- Risk Classification: Trees are categorized by their potential to contact power lines—either through grow-in (encroachment) or fall-in (collapse) and prioritized based on severity, location, and proximity to infrastructure.
- Customer Outreach: Programs like the Safe Tree Program assist property owners in high-risk areas with vegetation removal and replacement.

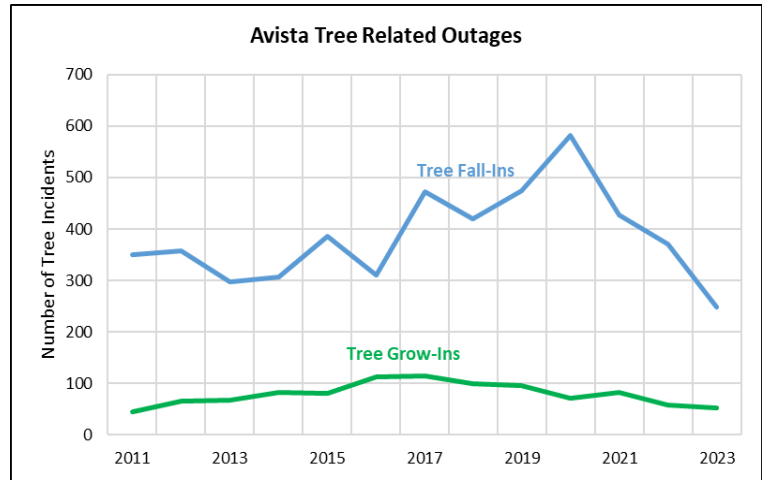


These enhancements reflect Avista's commitment to proactive wildfire mitigation and the integration of data-driven decision-making into vegetation management strategies.

Vegetation Outages

Tree incidents on the distribution system far exceed those on the transmission system. In most situations, transmission lines occupy a wider dedicated corridor right-of-way which affords the utility greater authority to manage vegetation. Also, transmission systems are regulated by federal agencies such as FERC and NERC with prescriptive mandates for vegetation.

In the past 15 years, there have been nearly 6,000 tree-related events on Avista's electric network.⁵ Vegetation contacts during periods of moderate to high winds represent a significant contributor to the fire risk profile.



Avista's tree-related outages for distribution and transmission

Avista's Vegetation Management Program is highly effective and commensurate with peer utilities in the region. A third party evaluation of our program found it "best in class" as described below. Despite encountering significantly higher levels of tree mortality across Avista's service territory—more than double the initial projections based on previous years—Avista has approached this challenge with notable effectiveness. In 2024, we removed 17,449 risk trees on the distribution and transmission systems as we continue to reduce the backlog of risk trees across our system.

Reducing the number of tree falls is an important component of Avista's Wildfire Mitigation Plan and positively impacts both wildfire risk reduction and customer service and reliability. Drought, disease, and insects have weakened trees in our service territory. Insects such as the pine bark beetle and spruce moth have



These photos, taken 4 months apart, show the rapid impact of an insect infestation

⁵ Avista Outage Management System, 2009-2024 dataset. This includes 5,872 incidents on the distribution system, 71 on the transmission system.

emerged as significant contributors to tree mortality and continue to increase the number of risk trees in our service territory. Forest health was made more dire by the historic drought of 2021 but also reflects increased levels of insect activity combined with human activity, all leading to higher levels of tree mortality than expected. In fact, the USDA anticipates “substantial tree mortality from insects and diseases through 2027.”⁶

Risk Tree Definition

At Avista, all risk trees with the potential of imminent fall-in hazard to the energized facilities are removed to eliminate potential for spark ignition events or outages. A risk tree is defined as visibly dead, declining, or found to be significantly structurally defective which could lead to falling into the conductor as defined in ANSI A300 (Part 9)-2017.⁷

Assessments conform to level 1 standards as performed from center of corridor, using ground-based or vehicle-based patrols.

“Cycle Busters.” Any tree that is making contact with the conductor is mitigated immediately. Any fast growing species that is growing at a rate faster than the 5-year pruning cycle and is encroaching the conductors beyond an acceptable clearance within those 5 years is defined as a “cycle buster”. All reasonable efforts are made to remove such trees as quickly as practicable.



Example of a tree fall-in contacting power line

Fire Safety Practices

Avista follows Washington Industrial Fire Precaution Levels and Idaho Fire Restrictions rules and requirements. Avista contract vegetation crews and in-house construction crews are compliant with all aspects of these rules. To review further details about preventing and mitigating fires while performing Avista work, please refer to **Appendix D**.

Tools & Techniques for Inspection

Avista’s Wildfire Plan added to the traditional boots-on-the-ground, aerial, and vehicle-based vegetation inspections with digital data collection methodologies. Specifically, utilizing LiDAR for the transmission system and satellite imaging for the less-linear layout of the distribution system. In addition, drones have been used for risk tree inspections over the last two years in areas that are difficult to access on foot and/or areas that present safety concerns to inspectors.⁸ In 2024 the use of

⁶ “Forest Health Summary for the Pacific Northwest Region 2022: USDA Forest Service: Forest Health Protection, Oregon Department of Forestry, and Washington Department of Natural Resources, July 11, 2022, [Forest Health Summary for the Pacific Northwest Region 2022 \(arcgis.com\)](https://arcgis.com)

⁷ <https://treecareindustryassociation.org/business-support/ansi-a300-standards/part-9-tree-risk-assessment-a-tree-failure/>

⁸ The Clearwater River canyon between Grangeville and Elk City.

an Avista drone (piloted by an Avista drone pilot) and a contracted arborist/inspector completed inspections. In 2025 the contractor is using their own drone to complete the inspection, creating a more efficient process. Avista is also exploring LiDAR captured by our internal drone team for use in vegetation management, but it has only been demonstrated in test cases so far and is not operational yet.

Avista's Vegetation Management Methodologies

Avista's Vegetation Management Program incorporates four primary methodologies:

1. Routine Cycle Maintenance: The goal with this program is to inspect the entire distribution system on a 5-year cycle, focusing on trimming practices specific to individual site and tree species. Routine Cycle Maintenance also removes young trees/brush or established trees that grow too fast to remain within the 5 year cycle.
2. Risk Tree Mitigation: Trees that are dead, declining, or found to be significantly structurally defective are identified as Risk trees. Avista employs a one-year inspection cycle to identify risk trees on 100% areas that fall within certain selection criteria. Risk trees found through inspection are mitigated prior to the following fire season. Any tree that is deemed to be an immediate threat of failure and any vegetation that is identified in contact or potentially making contact under load during inspection is called out and managed within an escalated timeframe, depending on circumstance.
3. Unplanned Work: This is ad hoc work that requires off-cycle mitigation outside of Risk Tree or Routine Cycle Maintenance Programs. These requests occur when a lineman, customer, or tree crew identifies and reports a tree that needs mitigation. They are prioritized appropriately and assigned to tree crews. This work can include storm work, some grid hardening-related vegetation work, and safety trims.
4. Right of Way Clearing: This includes physical removal of brush and undergrowth within the right-of-way using heavy mowing equipment and the selective application of herbicides. This practice is more prevalent on the Transmission system, with a typical herbicide treatment applied on a 6-10 year cycle.



A branch spanning two conductor segments for a sufficient period of time may ignite the branch and also may produce high-energy, high-temperature arc

The Distribution and Transmission systems each have individualized inspection, and mitigation plans as well as schedules. These are described in more detail below.

Note: The Idaho Commission asked if we considered “vegetation management recommendations by other federal, state, and county agencies into its standards.” While we have not incorporated the standards of other programs into our own at this time, we maintain a collaborative approach across all aspects of the Plan and value ongoing feedback and suggestions. However, vegetation management for utilities differs from general practices primarily due to the need for safety, reliability, and compliance with utility-specific regulations. Avista’s vegetation management practices are based on established industry standards: ANSI A300 (Part 9)-2017 Tree Risk Assessment - a. Tree Failure as well as NERC vegetation management regulations specific to electric utility transmission to protect the integrity of the grid.⁹

In addition, in June of 2023, the Idaho Public Utilities Commission (IPUC) requested that Avista engage a third party to conduct a study of the most efficient vegetation management cycle for the service territory. This study was completed in May of 2024 and found that Avista maintains a reasonable and responsible approach that is aligned with “best-in-class” vegetation programs of other major utilities, and that that Avista’s annual-cycle approach to managing utility-related wildfire risk is an effective strategy. This study can be found in **Appendix A**.

Distribution Vegetation Management Programs

Routine Cycle Maintenance

The Routine Cycle Maintenance portion of Avista’s Vegetation Management program inspects 100% of the service territory over a five-year period, or approximately 20% of the distribution system annually. This work can include program maintenance, customer service requests, work requested by local offices, a tree replacement program (the Safe Tree Program), and can include risk tree inspection and mitigation.

During our Routine Cycle Maintenance, we maintain five feet of clearance for distribution lines (based on tree type and the site). When tree crews identify a risk tree during the routine inspections they pull it out of the routine schedule and prioritize it to be addressed as risk. Avista endeavors to mitigate risk trees no later than July 1 of the following year (the start of fire season).

This program will continue to operate as it was designed, working in conjunction with Risk Tree Program that resulted from implementation of the Wildfire Plan.

Risk Tree

In 2020, the Wildfire Risk Tree Program was split from the Routine Cycle Maintenance Program and given its own budget and scope of work. Each of these programs have different focuses but work synergistically to maintain all trees impacting Avista system.

⁹ FERC Reliability Standard FAC-003-4, [Template - Standard \(Results Based\) \(nerc.com\)](https://www.nerc.com/Template - Standard (Results Based) (nerc.com))

The Risk Tree Program is a major focus and O&M expenditure category in the Wildfire Plan. It added the following elements to our already existing Vegetation Management Program:

- Annual Risk tree inspections across 100% of the high fire risk areas of the distribution system, as well as additional rural areas, with the goal of mitigating risk trees prior to July 1 of the next wildfire season. This consists of ground-based visual inspection of approximately 6,546 miles or 83.5% of the distribution system.
- Fuel Reduction Partnerships with external parties such as the Idaho Dept. of Lands and Washington Dept. of Natural Resources to reduce fuels/vegetation on their properties near our facilities.
- Creation of a customer-based Safe Tree Program to remove and/or replace trees on customer property in danger of contacting powerlines.

Inspection Practices. Risk tree inspections are typically conducted on an ongoing basis throughout the year. The timing of inspection in a specific place on the system will differ from year to year as the Company seeks to balance many contributing factors impacting inspection and/or the ability to perform subsequent tree work. These factors include snow in remote and mountainous areas, weight limits imposed on area roadways, Industrial Fire Precaution Level (IFPL) shutdowns,¹⁰ and labor constraints impacting the number of inspectors available.



Tree trimming in action

Inspection Standards. Avista’s distribution inspections are regulated by ANSI A300 (Part 9)-2017 Tree Risk Assessment - a. Tree Failure.¹¹ Assessments conform to level 1 standards as performed from the center of the corridor using ground-based patrols.

Prioritizing the Work. Risk tree work is prioritized by WUI

WUI Tier	Weight applied	Sample calculation CDA_R_P4 (WUI %) x weight
3	10	0.229 x 10 = 2.29
2	5	0.655 x 5 = 3.275
1	1	0.009 x 1 = 0.009
Overall risk score		5.574

ranking and assigned for mitigation. A weight is applied to each of the WUI tier levels to ensure that Tier 3 areas are placed at higher priority levels for mitigation than areas with lower risk. The table

¹⁰ In Washington, Industrial Fire Precaution Levels (IFPL) are used to close areas of forest in order to reduce wildfire risk. By law it applies to industrial forest workers, including utilities, on over 13 million acres of forestland in the state. <https://www.dnr.wa.gov/ifpl>

¹¹ ANSI A300 Standards, [ANSI A300 Tree Care Standards - Tree Care Industry Association, LLC](#). Both print and digital copies of these standards are available for purchase.

above demonstrates how the overall risk weighting score is calculated.

Maintenance, Repairs, and Operations. Vegetation inspection is satisfactorily completed when all identified risk trees are captured in the appropriate database, notification is made from the inspection contractor to Avista, and the workplan is updated.

Actions required prior to mitigation include notification to customers in advance of work, obtaining necessary permits to perform work, organizing any specialized equipment, and/or arranging for site-specific requirements to perform work, and ultimately pruning or removal of vegetation according to plans and ANSI guidelines. Outside of the programmatic inspection and mitigation, there are also trees identified by inspectors, employees, and customers that pose imminent threats to energized facilities. These trees are mitigated based on the estimated imminence of failure, sometimes within a matter of hours. Execution of the mitigation schedule is subject to various constraints including regional accessibility due to weather, regional vehicle weight restrictions, regional state restrictions, and the time it takes to obtain required permits to perform the work. There are also other circumstances outside of the company's control such as property owner refusal and governmental and tribal permitting.¹²



Risk tree marked for removal

During the removal of risk trees, precautions are taken to avoid damage to adjacent standing timber or other property. Dead trees are felled and left. Live risk trees are felled and limbed flush. Disposal of the trees is in accordance with the general specifications or landowner agreement. Care is taken to mitigate fire hazards posed by risk trees, including thorough dicing of debris, or moving debris to another location. When risk assessments are made, the risks associated with wildland fires are factored in regardless of the current fire conditions.

Measurable Targets and Goals. Avista tracks miles of inspections completed as well as remediation activities. For distribution satellite data collection, Avista tracks inspection miles completed. Note that we do not set goals for risk trees removed, as the number is dependent upon factors outside of the Company's control which can vary widely from year to year, for example drought, insect damage, or disease. The resulting variance in work required and associated cost is managed through each Commission-approved Wildfire Expense Balancing Account, which provides flexibility for unexpected expenditures such as a greater number of risk trees removed than anticipated. For this category we

¹² Washington State experienced several strong windstorms in 2024, including the November bomb cycle on the west side of the state, which is considered the worst windstorm in Washington in over 60 years. "Washington windstorm among the worst in 60 years," Axios News Seattle, November 25, 2024, <https://www.axios.com/local/seattle/2024/11/25/bomb-cyclone-historic-windstorm-washington-pnw-2024>

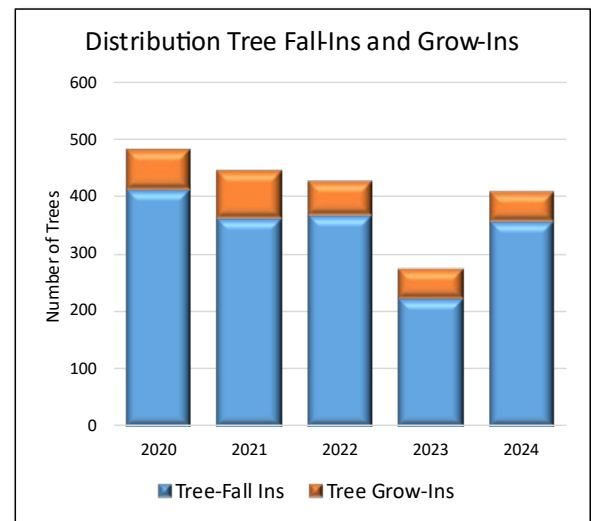
track actual number of removals.

Measuring Success. A key performance measure of the Wildfire Plan is reducing the number of tree incidents Avista experiences over the long term. Tree contacts with powerlines are categorized as either grow-in risk (encroachment into lines) or fall-in risk, with dead, dying, and diseased trees naturally more likely to fall into electric lines than live green trees. Our historical outage data indicates that in our service territory, trees fall into electric distribution lines about five times more often than they grow into them. There are far fewer tree incidents with transmission lines than distribution lines, largely because right-of-way corridors are often better defined for transmission lines compared to those for the distribution system. Over time we have a decline in tree-related outages. Reducing the number of tree falls is an important component of Avista's Wildfire Mitigation Plan and positively impacts both wildfire risk reduction and customer service and reliability.

For further details regarding the Distribution Risk Tree Program please see **Appendix E**.

Distribution Satellite Imaging

For the distribution system, we began incorporating a satellite-based methodology which allows for a system-wide approach rather than conventional corridor collection. Satellite imaging aligns well with distribution topologies, as it works very efficiently for the trunk-and-lateral, non-linear configuration of the distribution system, which may lack well-defined flyable corridors. Satellite acquisition allows collection over a broad area both in urban and rural areas. This system uses high resolution satellite imagery acquired once per year and pairs this information with computer-based machine learning algorithms to assess the risk of both tree encroachment (grow-in) and risk tree risks (fall-in). Although Avista continues to test the feasibility of utilizing distribution satellite imagery for vegetation management, the results do not currently drive our work plans or areas of work specifically at this time.



Distribution tree events over time

Transmission Vegetation Management Program

Avista's Wildfire Plan did not alter the thorough vegetation maintenance practices on the transmission system but did add LiDAR surveys to aid with inspections. LiDAR inspections can specifically identify and measure vegetation type and precise distance from conductors as well as fall-in potential. LiDAR aids in focusing tree work where it will provide the most value and protection. Transmission Engineering is also using LiDAR images to help identify maintenance issues or problems that are not easily seen with visual inspections.

Avista operates approximately 700 miles of 230 kV and 1,600 miles of 115 kV transmission lines throughout eastern Washington and northern Idaho.¹³ Unlike the distribution system, there is no rural/non-rural distinction for transmission risk tree inspection, and so with a combination of ground-based, aerial, and LiDAR inspection, 100% of Avista's transmission system is inspected for risk trees each year, equating to 2,270 miles of the transmission grid. Line inspection schedules are determined annually and set on a flexible schedule allowing for availability of helicopters, weather, access, condition of the right-of-way, length between inspections cycles, anticipated growth of vegetation, and reliability information.

Aerial Inspections. Aerial inspections are used to assess vegetation conditions both within and beyond the right-of-way (ROW). These inspections help identify:

- Dead or dying trees
- Leaning trees
- Vegetation encroaching on conductors from the sides or underneath, especially in deep draws where large trees remain below the wires
- Areas where line sag and sway may affect clearance

Aerial inspections are especially valuable in regions such as fields, scablands, and canyon lands that are difficult to access or observe from the ground. They also provide a broader landscape view, particularly in areas with sparse tree cover.

During aerial inspections, additional observations are made, including:

- Recent logging activity
- Wildfire-affected areas
- Disease outbreaks
- Unauthorized attachments or structures
- Tree mortality
- Road access conditions

¹³ 2024 Avista Quick Facts, [365756ed-8fd4-48f4-9abe-e79ef78c730b \(avistacorp.com\)](#). We also part owners of about 500 miles of 500 kV lines out of Colstrip in Montana but are not responsible for maintenance or inspection of these lines.

When potential issues are identified from the air, a follow-up ground inspection is automatically initiated. In some cases, landowners are notified as a courtesy prior to aerial or ground inspections.

Ground Inspections. Ground inspections are essential for identifying overall vegetation characteristics and condition on and adjacent to the ROW. This includes observing vegetation clearances to conductor, vegetation height on the ROW, and identifying hazard trees. Tree assessments consider multiple factors, including:

- Species and condition
- Proximity to transmission lines
- Structural integrity and anticipated growth
- Movement and failure characteristics
- Historical failure data in the area
- Terrain and accessibility
- Span location and line voltage
- Line construction, wire sag, and sway
- Fire risk and easement/permit details

In forested areas, especially along transmission ROWs, ground inspections are the primary inspection method. They allow for detailed observation of trees both within and along the edges of the ROW, enabling more accurate identification of potential issues.

LiDAR Inspections. LiDAR technology provides precise data on vegetation type and proximity to conductors, including fall-in potential. It can detect clearance issues that may not be visible through traditional methods and pinpoints exact locations of concern. Tree health can also be assessed by LiDAR, which can detect stressed trees.

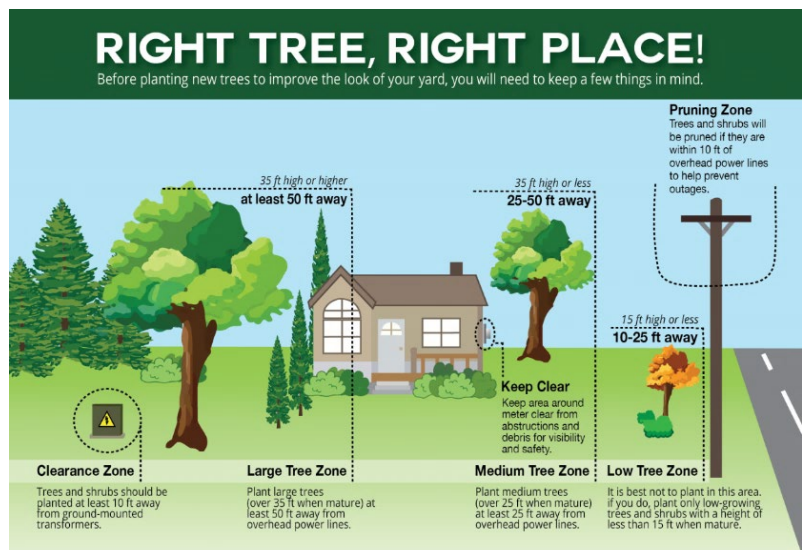
Avista has been using LiDAR technology to inspect transmission lines since 2020. While calibration with human observations is ongoing, LiDAR is rapidly becoming an industry standard. It enables a comprehensive vegetation record and supports the development of future work plans.

Currently, LiDAR analytics are used to prioritize tree work where it offers the greatest risk reduction and system protection. By combining digital data with machine learning algorithms, we are shifting toward a risk-based treatment approach rather than relying solely on routine maintenance cycles.

Avista also leverages imagery to identify maintenance needs and diagnose specific issues. Additionally, LiDAR data supports refinement of our Wildland-Urban Interface (WUI) maps by distinguishing between high canopy and low vegetation areas. This information informs transmission resiliency planning, including decisions between steel replacement and fire mesh wrap strategies.

Safe Tree Program

Avista's Safe Tree Program proactively works with customers in high fire-risk areas to remove tall, non-compatible trees near power lines and replace them with low-growing species, at no cost to the customer. Since launching in 2022, the program has expanded across our service territory, with strong customer engagement through MyAvista.com. Most customers opt for removal without replacement, helping reduce long-term maintenance and wildfire risk. Over 4,000 risk trees have been removed through the program to date.



Fuel Reduction Partnerships

Avista believes that partnerships with external entities are essential to effective wildfire prevention and mitigation. We work with professional firefighting agencies at every level—from local to national—to strengthen relationships through joint training, simulation exercises, emergency operations, and shared efforts to promote fire-adapted communities. We also incorporate partner feedback into our strategies and provide funding to state and local agencies to reduce fuels near our facilities. This program, known as Fuel Reduction Partnerships, has been active since 2022.

A key focus of this program is supporting our wildfire allies—primarily state, county, and Tribal agencies—in reducing fuels that contribute to catastrophic wildfires. For example, the Washington Department of Natural Resources (DNR) is implementing a 20-year forest health plan across 2.7 million acres in central and eastern Washington, targeting areas impacted by beetle kill and other forest health issues. Avista partners with agencies such as the Washington DNR, Idaho Department of Lands, the Nez Perce Tribe, and local fire districts to fund forest thinning and brush reduction near our infrastructure. These efforts help reduce wildfire severity and fill funding gaps faced by these agencies.



In Idaho, several communities served by Avista are classified as at risk of wildfire. We collaborate with the State to support fuel reduction in these areas, where treatment costs are higher due to denser vegetation requiring more mechanical intervention. One example is our support for Bonner County’s BonFire Program, which provides technical expertise and labor to help landowners reduce fuels around their homes. In 2025, we supported funding for treatment of 54.5 acres in Bonner County. These efforts not only protect local communities but also foster new partnerships with fire agencies across Idaho.

Agency	Agreement
Washington Dept. of Natural Resources	\$100k/year through 2032
Bonner County, Idaho	\$160,000 (one year only)
Spokane City, Washington	\$25k/year through 2026
Malden, Washington	Goat grazing, not to exceed \$10k total through 2025
Latah County Conservation District, Idaho	Not to exceed \$150k/ good for five years

In Washington, our projects have included fuel reduction in Spokane’s Dishman-Mica Hills Natural Area and innovative approaches like using grazing goats to manage vegetation in the town of Malden. These initiatives continue to strengthen our relationships with key partners and contribute to broader wildfire mitigation goals.

Fuel Reduction Partnerships Goals	2026	2027	2028
Washington Acres Per Year	150	150	150
Idaho Acres Per Year	60	60	60

Fuel reduction goals

Marketable Timber

We do not currently have any agreements or rules with timber companies that inform us how payments at fair market value will be made for the removal of live, merchantable timber. However, it is our practice to notify all landowners of the need to remove live trees prior to removal. Merchantable timber on private land generally belongs to the landowner. It is cut and left in whole tree lengths along the right-of-way. Whether payment is required, how the value would be determined, and the amount owed would all be borne out of our conversation with the landowner or their representative when we seek permission to remove the live tree. On agency property (USFS, BLM, state, and Tribal lands) approvals are also needed, and timber is appraised and paid for prior to cutting. If the logs are purchased by Avista, they will either be hauled to a sawmill or left on site. Rules and regulations pertaining to Forest Practice Acts in the States of Idaho, Montana, and Washington shall be followed when harvesting timber from rights-of-ways.

Vegetation Management Budget & Targets

For detailed budget and target information related to Vegetation Management programs, please refer to **Appendix B**.

OPERATIONS & EMERGENCY RESPONSE

Protective Devices & Operational Practices to Reduce Risk

Wildfire risk is influenced by equipment failures, vegetation contact, wind, snow, and lightning—all of which can cause line faults and disrupt electric service. To mitigate these risks, Avista employs a combination of infrastructure upgrades and operational practices designed to reduce fault frequency and impact.

Historically, our programs have focused on reliability and customer service. With the implementation of our Wildfire Plan, we've expanded these efforts to include wildfire risk reduction. This includes installing or upgrading midline reclosers and substation breakers to enable Fire Safety Mode protection settings on circuits in elevated fire risk areas. These devices provide greater control and automation over our distribution protection systems, helping prevent spark events.



Flexible Infrastructure & Remote Operations. Avista utilizes flexible infrastructure such as automatic reclosers and remote-controlled devices to support wildfire mitigation. These technologies allow us to:

- Monitor and control distribution equipment remotely.
- Adjust protection settings dynamically based on fire risk.
- Disable reclosing or de-energize lines in extreme conditions, following established procedures.

Centralized data systems like SCADA provide real-time visibility into the power system, enabling operators to respond quickly to changing conditions and implement protective measures.

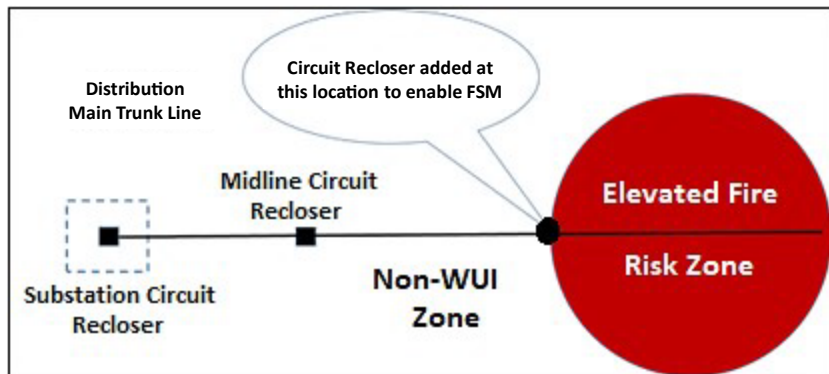
Fire Safety Mode & Expedited Response. When fire risk is elevated, Avista activates Fire Safety Mode operations, modifying distribution protection settings to reduce the fault current exposure, ultimately reducing the chance of equipment-related ignition. In severe cases, we may implement Public Safety Power Shutoffs (PSPS) to proactively de-energize lines.

We also deploy Expedited Response protocols during fire season, dispatching professional firefighters to the site of any transmission outage to verify that no spark or fire has occurred.

Partnerships & Communication. Effective wildfire response depends on strong partnerships. Avista collaborates with organizations such as the Red Cross, Washington DNR, IDL, and local firefighting agencies to coordinate preparedness and response efforts. Our plan also includes a robust communication strategy to keep stakeholders informed during wildfire events.

Automation

Avista's automation strategy focuses on enabling remote monitoring and control of key protection devices across the system and within substations—especially in areas with elevated wildfire risk. Automation equipment acts as “eyes” on critical infrastructure, allowing operators to respond quickly to changing weather conditions that could increase fire danger.



Example of Avista's use of a recloser

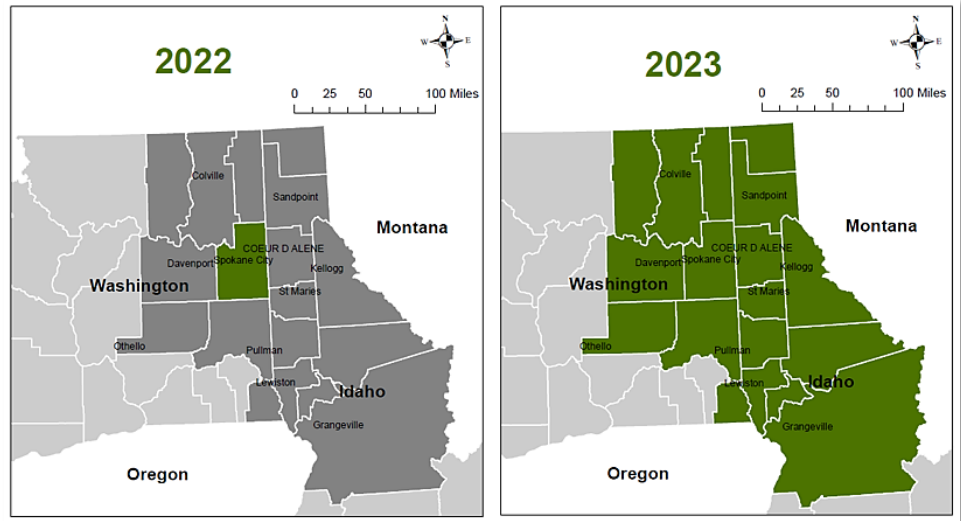
As part of our Wildfire Mitigation Plan, we have installed 50 midline circuit reclosers throughout our system in both urban and rural settings to provide the capability of deploying Fire Safety Mode settings, isolating higher risk segments of feeders, as well as isolating faults. Many existing reclosers lack remote capabilities, requiring manual intervention that can delay response by hours.

We are also upgrading substations in high-risk areas to support full automation. These upgrades vary widely depending on existing infrastructure. Some substations may need only minor hardware updates, while others require major installations like SCADA systems or new fiber/T1 lines. The scope and cost of each upgrade depend on factors such as the number of connected lines, existing communications infrastructure, and equipment condition. This multi-year effort is expected to continue.

Expedited Response

During the development of Avista's Wildfire Mitigation Plan, we collaborated with fire professionals—including Washington DNR, IDL, and Spokane County Fire Districts—to shape our strategies. One key outcome of these discussions was the creation of the Expedited Response protocol.

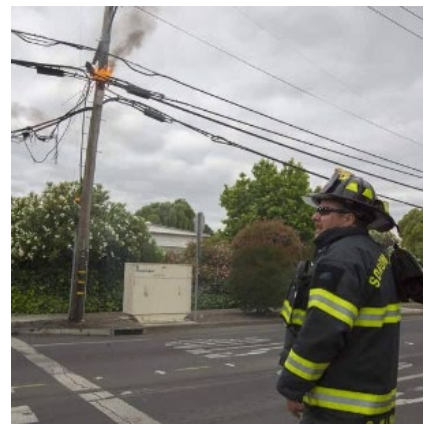
Under this approach, during fire season, Avista's System Operators initiate a call, to the appropriate agency, whenever a transmission fault occurs. This triggers the dispatch of professional firefighters to the fault location. The goal is rapid response: if a fault results in a spark event and ignites a fire, trained crews can engage faster, helping contain the fire before it spreads.



Avista's Expedited Response Agreements started in Spokane County in 2022 and now cover nearly our entire service territory

In 2022, Avista signed a Memorandum of Understanding with Spokane County Fire Department to pilot this program. Following its success, the initiative expanded across our service territory. By 2023, Avista had formal agreements with IDL, the U.S. Forest Service, and Washington DNR to respond to transmission-level outages during fire season in both Idaho and Washington.

These agreements allow our System Operators to request professional fire response during trip/reclose events when fire risk is elevated. A successful simulation with Washington DNR in June 2023 confirmed the effectiveness of the protocol—fire crews responded exactly as planned. These agreements are open-ended and cost-free to Avista.



Firefighters respond to a pole fire

With most of our transmission system now covered under expedited response agreements, we've added a critical layer of protection for our infrastructure and customers. To date, no fires have been found during these response activations, and we plan to continue using this strategy as part of our long-term wildfire mitigation efforts.

Fire Safety Mode

Electric faults—caused by equipment failure, vegetation contact, or severe weather—can interrupt service and pose wildfire risks due to the energy released before protective devices isolate the fault. Utilities typically use automatic reclosing to isolate faults, reduce safety risks from faulted conditions and potentially restore service quickly after temporary faults. However, in high fire risk areas, repeated reclosing can increase the chance of spark events. To address this, Avista developed Fire Safety Mode (FSM)—a targeted strategy to reduce wildfire ignition risk by adjusting distribution protection settings to better match the wildfire risk conditions to appropriately limit the fault energy that could occur with an electric fault.

Evolution of FSM. Avista began limiting reclosing on at-risk circuits during fire season in the early 2000s under a program called “Dry Land Mode.” In 2020, Fire Safety Mode (FSM) was created to utilize group setting capabilities with the protective relay to deploy protection setting changes to align with the current wildfire risk conditions to more appropriately limit the fault current that could be experienced. FSM includes multiple protection levels based on fire risk, determined by Avista’s Fire Weather Dashboard and its Fire Risk Index.

How FSM Works. FSM is activated based on weather forecasts, drought conditions, wildfire activity, as well as state agencies reports. Once fire season begins, all automated distribution feeders are opted into FSM, allowing real-time adjustments to protection settings. The system now includes four levels of operation:

1. **Normal Operations (Blue)**
Standard reclosing behavior—multiple attempts to restore service after a fault, prioritizing reliability.
2. **Base Level FSM (Yellow)**
After a fault, the circuit waits before attempting a single reclose. If unsuccessful, it remains off until inspected. This reduces spark energy and ignition risk while maintaining some reliability.
3. **Extreme FSM (Orange)**
Instantaneous trip with **no reclosing**. The circuit stays off until patrolled and cleared. Used only during severe fire conditions due to its impact on customer reliability.
4. **Public Safety Power Shutoff (PSPS) (Red)**
Proactive de-energization of circuits in extreme fire weather (e.g., dry conditions with high winds). PSPS is typically implemented when the **Fire Risk Index** reaches 7 or higher, and the forecasted safety risk outweighs reliability concerns. Unlike FSM, PSPS disconnects power **before** a fault occurs.

Key difference between Fire Safety Mode and PSPS: FSM responds to actual faults with modified protection settings; PSPS is a preemptive shutoff based on forecasted risk.

Infrastructure & Automation. Avista has modernized its system to support FSM, including installing remote-controlled reclosers and upgrading substations with automation and communications equipment. These upgrades allow for dynamic protection adjustments and remote operation, significantly enhancing wildfire mitigation capabilities.

Strategic Balance. FSM prioritizes public safety over system reliability. Enhanced protection settings may lead to broader outages if a fault occurs on a line serving multiple areas. Avista uses data-driven decision-making to balance wildfire risk with customer impact, applying FSM and PSPS judiciously.



Year-over-year comparison to when entering and exiting Fire Safety Mode

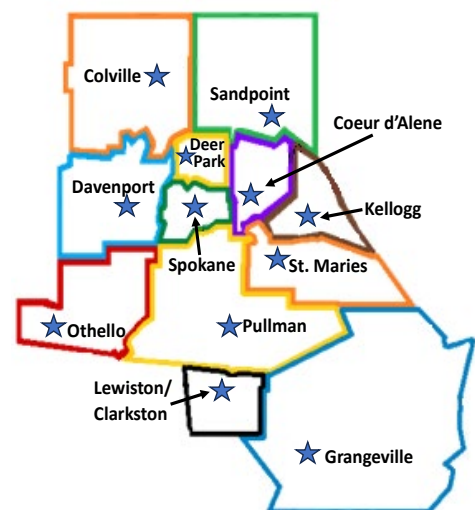
Workforce Training and Practices

While infrastructure and vegetation investments make up the bulk of Avista’s Wildfire Plan costs, workforce training, partnerships, and customer engagement are equally vital to wildfire resiliency. Many of these efforts are built on existing programs and relationships, and they deliver meaningful benefits—reducing operational risk and strengthening collaboration with fire protection agencies, emergency managers, and state partners like IDL and Washington DNR.

Internal Training. Avista’s electric line personnel, spread across 12 districts, respond to a range of electric trouble calls, including those involving wildfires. Prior to fire season, divisional managers conduct monthly safety meetings featuring wildfire-specific training led by Avista’s Wildfire Team, which includes staff with wildland firefighting experience.

Training emphasizes:

- Coordination with fire authorities before inspecting or re-energizing circuits.
- Understanding fire behavior—including the effects of terrain, weather, and wind.



Avista Service Districts

- LCES principles:
 - Lookouts assigned to monitor fire conditions.
 - Communication with fire personnel is critical.
 - Escape Routes planned in advance.
 - Safety Zones established for crew protection.

Crews are also trained on heat and smoke exposure risks, and take precautions such as avoiding dry vegetation and off-road travel during high-risk conditions. Vehicles are equipped with pressurized water cans, and in higher-risk areas, crews bring 500-gallon water trailers to job sites.



Avista has partnered with firefighters throughout our history.

External Partnerships. Avista’s wildfire response is built on strong relationships with first responders, emergency managers, community leaders, and state agencies. These partnerships enable coordinated, proactive responses to wildfire threats.

As part of the Wildfire Plan, Avista engages in cross-training with fire protection agencies. This ensures Avista personnel understand fire incident command structures and their roles during active events, while fire professionals are educated on electrical hazards to stay safe near utility equipment. Though Avista crews have basic fire safety training, they defer to professional firefighters during wildfire events.

For further details regarding preventing and mitigating fires while performing Avista work, please refer to **Appendix E**.

Operations & Response Budget & Targets

For detailed budget and target information related to Operations and Response programs, please refer to **Appendix B**.

PUBLIC SAFETY POWER SHUTOFFS

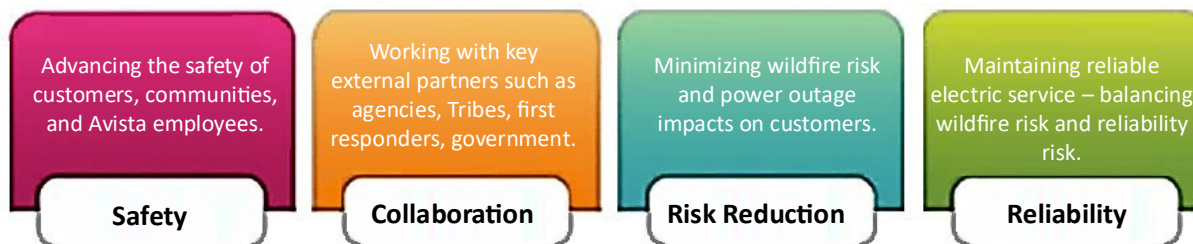
Public Safety Power Shutoffs (PSPS) are a last-resort wildfire mitigation strategy used to proactively de-energize power lines in areas facing extreme fire risk due to a combination of severe weather conditions like high winds and low humidity. Unlike Fire Safety Mode, which adjusts protection settings and only interrupts service after a fault occurs, PSPS involves preemptive shutoffs based on risk assessments to prevent spark events before they happen.

Avista's PSPS Plan outlines the criteria, protocols, and coordination efforts involved in these events. Decisions are informed by our Fire Weather Dashboard, which calculates a Fire Risk Index using factors such as wind speed and direction, fuel conditions, infrastructure vulnerability, and community impact. Coordination with emergency managers, critical facilities, and affected communities is central to our approach, along with efforts to minimize disruption through backup systems and communication strategies.

Each PSPS decision is made with careful consideration of real-time conditions and local context. While PSPS is rare and disruptive, it is a critical tool to protect lives, property, and infrastructure when wildfire risk is exceptionally high.

For full details on Avista's PSPS strategy—including operational protocols, coordination plans, and decision criteria—please refer to **Appendix F**.

Avista's Purpose and Scope for Public Safety Power Shutoff Events



Wildfire Emergency Operations Plan (EOP)

Avista's Emergency Operating Plan (EOP) outlines the command structure, roles, and procedures used during emergency events, including wildfires. As part of our Wildfire Mitigation Plan, a specific EOP was developed to support high fire risk scenarios and guide the implementation of Public Safety Power Shutoffs (PSPS).

Unlike traditional storm response, which reacts to system damage, PSPS is a proactive decision to shut off power based on elevated wildfire risk. This requires detailed planning, coordination with emergency managers and critical facilities, and clear communication with affected communities.

PSPS and Transmission

Avista has expanded its PSPS strategy to include portions of the transmission system, recognizing the added complexity and broader impact compared to distribution lines. Transmission lines are part of the Bulk Electric System (BES), which supports the reliability of the Western grid and carries heavy summer loads. A transmission outage can affect a large number of customers, utilities, and contractual obligations, making PSPS decisions at this level more sensitive and situational.

For the 2025 wildfire season, Avista added steps to implement non-reclosing protection schemes on select 115kV transmission lines if the Fire Risk Index (FRI) exceeded 5.5. Lines with remote automation may be dynamically placed in and out of non-reclosing mode, while manual adjustments require additional analysis and field coordination. Avista also works with neighboring utilities to manage joint transmission line operations during elevated fire risk. There were no instances in 2025 of the FRI of a transmission line going above 5.5.

For more details on transmission-level PSPS protocols, decision criteria, and operational procedures, please refer to **Appendix F**.

Conditional De-Energization

Avista uses several types of de-energization to reduce wildfire risk and protect public safety. These include:

- **Conditional De-Energization:** Selective shutoffs of equipment or lines with no immediate customer impact, at the decision of System Operations during elevated fire risk or storm events.
- **Planned Work:** For wildfire resiliency or infrastructure upgrades, customers are notified in advance through mailers, calls, and other outreach. Large projects may include community meetings and media engagement.
- **By Request:** Avista routinely de-energizes lines at the request of first responders to protect firefighting personnel. This applies to both distribution and transmission systems and is coordinated through incident command structures.
- **Wildfire Encroachment:** Lines may be proactively de-energized if fire or smoke threatens infrastructure, based on field reports and situational analysis.
- **Third-Party Providers:** Avista coordinates with independent generators and other utilities connected to its system. If safety concerns arise, Avista may de-energize shared infrastructure, with ongoing communication to affected parties.



Media Alert

Contact:
David Vowels, (509)495-7956, david.vowels@avistacorp.com
Avista 24/7 Media Access (509) 495-4174

Avista customers in Kettle Falls to experience a planned power outage

Spokane, Wash., July 21, 2025: Approximately 330 Avista electric customers in Kettle Falls will experience a planned power outage on Friday, July 25. The planned outage will start at 8:30 a.m. and end at 2:30 p.m. Impacted customers will be notified.

During this time, Avista crews will be performing maintenance on equipment in the area. Avista is continually updating equipment and infrastructure to increase the safety and reliability of its system.

Customers who have questions or concerns can contact Avista at (800) 227-9187.

Avista media alert for a planned outage

De-energization decisions balance wildfire risk with the need to maintain service, especially for critical infrastructure and medically vulnerable customers. Restoration after a PSPS event involves thorough inspections, coordination with fire personnel, and may require mutual aid or aerial patrols. Access, geography, and weather all influence restoration timelines.

Customer Support

Avista is committed to helping customers prepare for and navigate Public Safety Power Shutoff (PSPS) events, recognizing the potential hardships and safety concerns caused by extended outages. These events are only implemented after careful evaluation, and we work to minimize disruption through proactive communication, support centers near impacted areas called Community Resource Centers, and a Battery Backup Program for customers who depend on medical devices which need 24/7 electricity.

We prioritize coordination with public safety partners, municipalities, Tribal authorities, and critical service providers such as hospitals, airports, and communications systems. Our CARES team supports customers with special needs, and we provide outage maps, educational outreach, and real-time updates through multiple channels.

PSPS decisions are made with sensitivity to customer impact, balancing wildfire risk with reliability. Restoration efforts are carefully planned and may involve mutual aid, aerial patrols, and prioritization of essential services.

Community Resource Centers

In the event of a PSPS,¹⁴ 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 CRC's 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.

Battery Backup Program

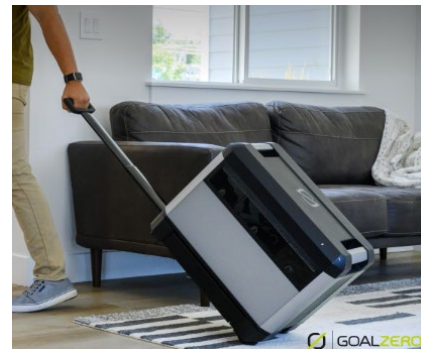
With the implementation of PSPS, customers with medical equipment that sustains life could be significantly impacted when the power is out. A PSPS event can be lengthy due to the requirement to fully patrol the impacted line before putting it back into service to ensure that it is safe to re-energize. We developed the Battery Backup Program to provide medically qualified customers who depend on medical devices which require 24/7 electricity with a battery backup system for use during power outages. We engaged with partners including Aging and Long-Term Care of Eastern Washington, who helped us develop this program and determine what type and what size battery would be needed in order to support customer medical devices for multiple hours. Postcards regarding this program were sent out starting in early June 2024 to registered life support customers in the highest wildfire threat areas of our service territory. In 2024, Avista delivered around 71 batteries. In 2025 we sent out additional postcards and Avista delivered 136 batteries. Avista's Customer Assistance Referral and Evaluation Services (CARES) Team collaborates with medical providers to verify customers having significant dependency on electricity for medical devices and their eligibility for the program.

Participant Qualifications. This Program is available to customers who have been verified by a licensed physician as medically dependent on electric life support equipment. Customers are required to fill out an application and have their primary care physician validate their medical need.

Recertification is needed bi-annually for the account to remain in the CARES life support caseload. In most instances, eligibility means that a customer is dependent on their medical device 24-hours a day. However, medical devices like dialysis machines (not used 24 hours a day) also qualify for the program. Other qualified medical devices include oxygen respirators, ventilators, iron lungs, feeding or infusion pumps, and ventricular assist devices. Customers who have a backup home generation system and/or a battery backup are not eligible for an Avista-provided battery. The customer must agree to and acknowledge the backup battery terms and conditions.



*portable power bank
battery*



*Goal Zero Yeti Pro 4000 portable
power station*

Program Goal. The goal of the program is to provide medically vulnerable customers with a portable battery to give them additional time to make decisions in the event of a PSPS event. The threat of power disruption for those who are dependent on electricity for their medical equipment may make it challenging for them to make informed and rapid decisions. Therefore, having a battery capable of giving them 6-8 hours (or more) of additional time if the power goes out allows them the flexibility to implement their emergency plan and make arrangements when necessary.

Program Cost and Specifications. Customers are not charged for these batteries. The initial cost per participant for the battery in 2025 was approximately \$3,000. This included a portable Yeti 4000x battery, which provides over 3,600 watt hours of electricity use, the processing fees from the battery distributor, and shipping to the primary residence of the customer. In 2025 136 customers were gifted batteries. It is expected that this program will have less participation in 2026 due to the saturation rate of qualifying customers.

PSPS Coordination

Avista has a structured communication plan to support coordination throughout the lifecycle of a Public Safety Power Shutoff (PSPS) event. Before fire season, we focus on education and preparedness with emergency managers, public safety agencies, and community partners. During fire season, we actively engage with these stakeholders and the public to ensure timely updates and coordinated response. After the season, we evaluate outcomes and identify areas for improvement. When a PSPS is planned or initiated, Avista works closely with impacted parties, especially those responsible for public safety and critical infrastructure, to ensure clear communication and minimize disruption.

Other Utilities

Avista is working closely with our neighboring utilities on wildfire issues, including PSPS. They are invited to participate in our tabletop PSPS exercises and engage in our annual Partner Forum. We share our technologies with them, specifically our Dashboard, wildfire camera feeds, and weather station data. We are currently working with our directly interconnected neighbors to produce a list of shared substations and transmission lines that may cause impact, including sharing maps to allow



Dear Jenny,

Wildfire season is here, and we want to remind you that the risk of power outages may increase, which can impact medical equipment that relies on continuous electricity. Your safety and well-being are our top priorities.

To support our customers who depend on 24-hour electricity for medical devices, Avista is offering a complimentary 4000x BioLite battery specifically designed for medical equipment.

If you feel that your household may benefit from this support, please call us at (888) 700-2757, Monday through Friday, between 8 a.m. and 5 p.m. If you qualify, your battery will be shipped to your residence at no cost.

We also encourage all customers to have an outage preparedness plan in place. For additional information and resources, please read about Avista's Life Support program at myavista.com/medicalequipment.

Additionally, as part of our ongoing commitment to safety, we have enhanced our measures to help prevent wildfires. This includes setting line breakers to be more sensitive and, in some cases, proactively shutting off power in certain areas during extreme weather conditions. Visit myavista.com/wildfire to learn more.

Sincerely,

The Avista Customer Care Team

Avista customer contact offering a backup battery

coordination during a PSPS. These maps will allow us to quickly identify areas of impact and what infrastructure of each may be affected. We are working together to provide area fire departments with these maps so they know which facilities belong to each utility to make contact and communications more streamlined.

Most co-ops and public utilities in our area do not have a formal PSPS plan, so we are sharing our PSPS processes with them to help them get started. We work with them, as well as the Washington DNR and the IDL, to locate our camera and weather stations so we coordinate and complement rather than overlapping these resources. We are committed to helping everyone be safe and thus share resources when possible.¹⁴ We are also working together to identify shared sites for Community Resource Centers. More opportunities to partner with other utilities on this issue will likely come up as they move forward with their own plans.

Emergency Management Agencies

Emergency management agencies are considered key partners in Avista's wildfire efforts and are engaged in a spectrum of efforts related to this work. They join in our annual Partner Forum in which participants receive updates on wildfire mitigation strategies and work together on strategies. They are invited to join in cross-jurisdictional collaboration (which includes other agencies and Tribal nations) and take part in scenario-based discussions to refine communication protocols. They are also invited to be active participants in our annual Telephone Town Hall discussions appropriate to their jurisdictions. They have helped provide training to our employees in supporting customers during PSPS events (the Red Cross trains our CARES team) and provided input to our wildfire strategies. They provide customer support during outage events.

Avista's Regional Business Managers (RBMs) play a central role in our external wildfire-related outreach and engagement efforts. They are responsible for direct communication with emergency management, public safety partners, local governments, and critical infrastructure operators such as water and wastewater utilities. Their work ensures timely, accurate, and appropriate communication with all impacted parties before, during, and after wildfire season, including any Public Safety Power Shutoff (PSPS) events. Prior to wildfire season, these employees conduct education and outreach on Avista's Wildfire Plan, including mitigation strategies, communications, how we will engage with them, key mitigation activities, and public readiness initiatives.

In the event of a PSPS, the associated RBM provides advance notifications via phone and email to impacted partners including emergency management, public safety, local government, and critical infrastructure operators, and will provide real-time updates to these customers. They help ensure continuity of essential services. After an event, they provide restoration information and updates.

¹⁴ Sharing of some of our technologies is limited by contractual agreements.

Critical Service Providers

Prior to an event, Avista Account Executives review the PSPS impacted feeder lists as soon as they are provided by Operations, identifying any commercial and industrial customers or critical service providers on the impacted feeder(s). They reach out to these customers directly. The Account Executives work with these customers before an event for notification, during the event to provide updates, and after an event to ensure that the customer is back in operation. These customers are provided advanced notice via phone and email as well as real-time updates and post-event restoration timelines with the goal of ensuring continuity of essential services.

Communities

When a PSPS event becomes likely, the Avista's Wildfire Team will reach out to the community partner who has agreed to host a Community Resource Center in the area of the anticipated PSPS. The host will be given as much notice as possible to ensure that the center is ready and available for use. The Company's External Communications team issues a message to impacted customers about the potential for a PSPS along with information about the CRC location, hours, and provisions. Avista Community Response Ambassadors will be dispatched to the CRC to provide customer information and support.



Tribes

Avista's American Indian Relations team meets with our regional Tribes at least annually providing information about Avista's Wildfire Plan for the upcoming fire season. Our wildfire-related plans and strategies are shared with the Tribe's leaders as well as their emergency management, natural resources and social services departments. The annual update includes wildfire prevention measures such as tree maintenance, access to camera and weather station data, situational awareness, and how Tribal authorities can partner with Avista in wildfire preventative measures on the reservations. Tribal communication includes general education about Avista's wildfire efforts and Public Safety Power Shutoff pre- and post-event engagement. Avista also works with the Tribes to identify customers with medically vulnerable life support needs as well as securing locations for Avista to host community resource center(s) in case of a PSPS event within Tribal jurisdictions.

Commissions

Our state utilities commissions have the expectation of being notified when we enter Fire Safety Mode and if we implement a PSPS event within their respective jurisdictions. As a course of business, we send them information about our curtailment process, the notification process, the alert, who is being impacted and contacted, and large customers that may be impacted. This information includes a situational report containing start date and time, location, duration, customer count, cause, contact, and time and date of restoration.¹⁵ In Idaho and Washington, this includes direct communication with the ESF-12 Coordinator.

PSPS-Specific Communications

Effective communication is central to Avista's Public Safety Power Shutoff (PSPS) strategy. We engage with customers, emergency managers, public safety agencies, Tribal authorities, and community organizations before, during, and after fire season to ensure awareness, preparedness, and coordinated response.

Before Fire Season. Avista hosts virtual town halls, distributes educational materials, and conducts outreach to special needs and life-support customers. We also hold an annual PSPS Partner Forum to align with external agencies and refine cross-jurisdictional coordination.

When a PSPS is under consideration, we notify customers and partners through multiple channels: email, IVR calls, text alerts, social media, website banners, and outage map updates. We also connect customers to additional support services, including 211 and local aid organizations.

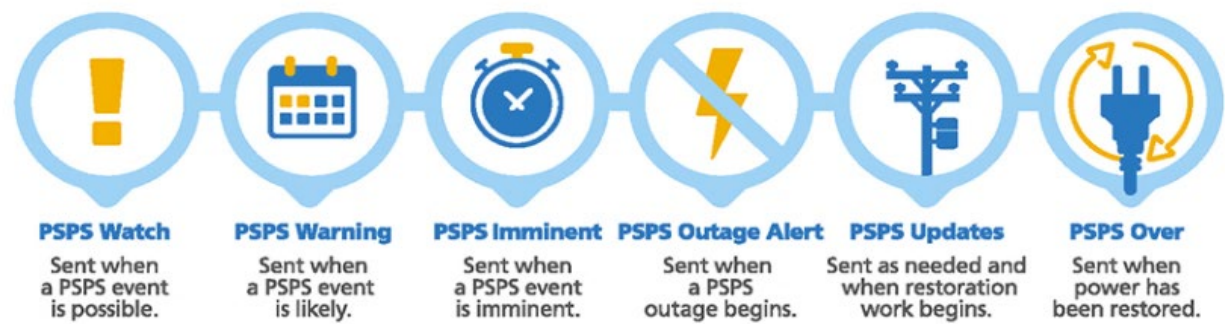
Avista Commission Communication

Sept. 29, 2024, 1:20 PM Update – the Company has decided to call a PSPS for the approx. 1500 customers served off of Indian Trail 12F2. The de-energization will occur around 1:45 PM in advance of peak wind conditions starting around 2PM. We expect the weather pattern to pass later this evening, and when it is safe we will patrol the line and safely reenergize. We have a Customer Resource Center set up at Mead High School. There are no known life support customers, and only one part-time medically vulnerable customer that we will reach out to specifically (beyond the communications and out-bound phone calls already made to affected customers). Communications are being made right now to impacted customers that a PSPS is imminent. We will provide a further update later this afternoon (or sooner if warranted).

Example of Avista's outreach to the Commissions during a PSPS

¹⁵ For the Washington Commission we contact electric-outage@utc.wa.gov and for Idaho we contact secretary@puc.idaho.gov, Outage.Alert@puc.idaho.gov and ESF12.Alert@puc.idaho.gov.

During a PSPS Event. Avista provides frequent updates on outage duration and restoration timelines. Our CARES Team supports medically vulnerable customers, and Community Resource Centers (CRCs) offer device charging, internet access, clean water, and real-time information. CRCs are staffed by trained Avista employees and Community Response Ambassadors.



After Fire Season. Avista conducts after-action reviews with internal teams and external partners to identify lessons learned and improve future PSPS operations.

For full details on Avista’s PSPS communication protocols, notification procedures, and coordination strategies, please refer to **Appendix F**.

Vulnerable Customer Outreach

In 2022 we began an effort to better identify and support our most vulnerable customers. Many of our communities are rural or represent limited-income populations. Avista’s Wildfire PSPS program leverages data collected on vulnerable communities to help overcome customer barriers and enable us to utilize a multilingual and multichannel communication strategy to reach these communities. In addition, medically vulnerable customers could be significantly impacted when a PSPS is implemented. This puts customers dependent upon medical devices at risk. We use our communications channels to ask customers to report themselves or family members if they need specialized assistance and have developed the strategies mentioned earlier to provide support. We have developed several ways of reaching and supporting our most vulnerable customers.

Washington	Ave. # of Life Support Accounts	Idaho	Ave. # of Life Support Accounts	Medical Equipment Enrollments	
				2024	
2020	158	2020	158	Jan	2
2021	179	2021	179	Feb	0
2022	171	2022	171	Mar	0
2023	150	2023	150	Apr	5
2024	220	2024	220	May	103
2025	261	2025	261	Jun	437
				Jul	75
				Aug	72
				Sep	92
				Oct	53
				Nov	38
				Dec	25
				2025	
				Jan	21
				Feb	36
				Mar	42
				Apr	48
				May	64
				Jun	126
				Total	1,239

Avista life support and medical equipment customer counts are increasing due to our outreach efforts

2025 PSPS Activity

Avista did not implement any Public Safety Power Shutoff (PSPS) events during the 2025 wildfire season. While conditions warranted close monitoring, no situations met the threshold for proactive de-energization. We continue to learn from each season through system observation, stakeholder engagement, and internal reviews, refining our processes and readiness for future events.

For more details on PSPS protocols, planning, and decision criteria, please refer to **Appendix F**.

PREPARING FOR WILDFIRE SEASON

Preparing and Training Employees and External Partners for Wildfire Events

Since 2019, Avista has been building relationships and partnering with local emergency managers, first responders, fire districts and elected officials across our Washington and Idaho service territory in support of Avista's Wildfire Mitigation Plan. This includes county and city emergency managers, local emergency planning committees, local public health jurisdictions, fire chiefs, critical infrastructure providers, public safety leaders, and a variety of elected officials. Interactions with these key public safety partners include attending meetings to present and discuss the Wildfire Mitigation Plan (including PSPS), working with municipalities and agencies to identify critical infrastructure, updating the notification process (who, how and when) for PSPS, working with some of these partners to identify locations for Community Resource Centers (CRCs) in the event of a PSPS, and working with support agencies to identify vulnerable customers. Many of these partners were instrumental in developing the Plan, helping us create strategies (such as Expedited Response) and implementation of Plan elements. We also invite these partners to participate in tabletop exercises and other engagements such as cross-training opportunities to continue to build readiness, awareness, and relationships around PSPS. They also participate as guest experts in Avista's series of annual Wildfire Telephone Town Hall meetings.



Partner Forum

As mentioned above, each year we bring our public safety partners together to learn more about our ongoing preparations for the upcoming fire season, any changes or updates we have made or are planning to make to our Plan or strategies, and to help begin preparations for a PSPS event. The Partner Forum brings together a wide array of participants, including first responders and emergency responders who serve both Avista service territory and adjacent utility service areas, land management agencies for both Avista's service territory and contiguous jurisdictions, and Tribal governments and Tribal emergency response personnel. This forum, which has been held in prior years as an annual Tabletop Exercise, evolved to share updates on our wildfire mitigation strategies and Wildfire Mitigation Plan and encourages participant cross-jurisdictional teamwork and communication. During the time together, Avista leads scenario-based discussions to test and refine communication protocols and strengthen alignment across agencies and Tribal nations for emergency response. The goal is to help ensure that all partners are informed, aligned, and prepared for the upcoming wildfire season. In addition, it is a place where we can share what we have learned and our tools, especially with the smaller utilities who may not have the resources available to Avista.

Tabletop Exercises

Tabletop exercises help prepare Avista's internal response teams and provide an opportunity to practice the activities performed during an actual PSPS event. During the tabletop exercises, a realistic scenario is set up, and incident management teams go through the scenario as if it were occurring, developing strategies including customer outreach, crew placement, damage assessment, mutual assistance requests, and planned restoration efforts from the beginning of the scenario event until final restoration and return to normal operations. Participation of state and local agencies allows the teams to practice coordination efforts. Participants have noted that it enhanced their knowledge of emergency response plans, procedures, and strategies, allowing them to improve their performance. It also helped identify opportunities to improve capabilities to respond to real events. Including Avista's community partners has been incredibly valuable and appreciated.

These external parties tell us that they leave the exercise session with a better understanding of how we respond to events, which helps to level-set expectations during actual severe events. The relationships forged and having both sides learn each other's "language" helps Avista more easily integrate into Fire Incident Command to provide adequate support and information to fire teams during an incident. This joint practice helps all sides understand each other's roles and responsibilities.



Tabletop exercise

Partner Portal

Avista saw the need to employ a more strategic and coordinated approach to reducing wildfire risks by more efficiently notifying our safety partners using an automated, digital system related to Public Safety Power Shutoff events.

These partners include both internal and external staff, but the Portal is not available to regular customers. It is focused on

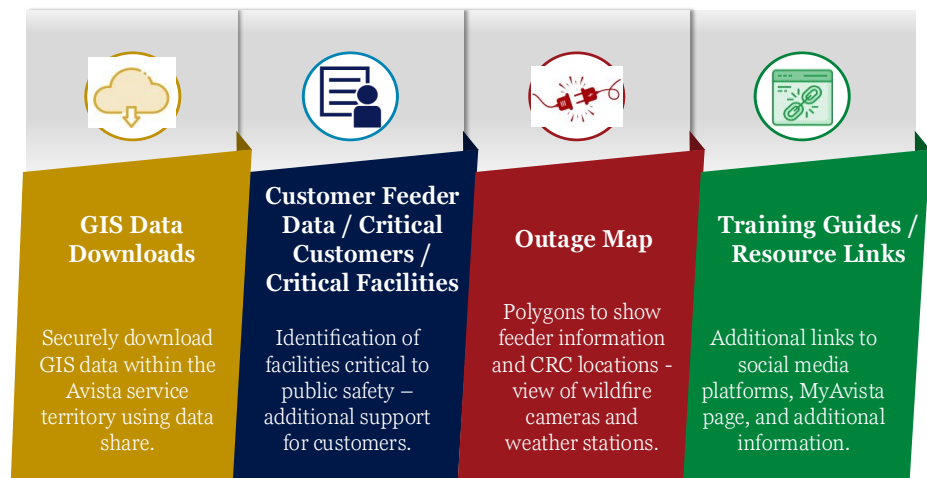
agency partners and requires a non-disclosure agreement for use. The Portal is designed to support Avista, its customers and our public safety partners from the start of a potential Watch/Warning/PSPS to the final stage of re-energization. This notification system will help reduce the time it takes to manually notify partners for a PSPS event and increase the percentage of partners receiving notifications within a specific, often very limited, timeframe. The portal will inform critical service providers, business partners, and customer care providers about the latest events, locations, and affected parties. It will be a springboard for additional tools they can use, including maps, feeder and customer data, and locations where customers may need additional assistance. It will also provide real-time access to Avista's weather station and wildfire camera feeds. This system will provide:

- **Alert Notifications:** Provide notification on potential PSPS, as well as patrolling and restoration efforts.
- **Tracking of Events in Real Time:** This includes maps and accurate, timely, actionable information our partners can use to support customers across our service territory.



Avista Partner Portal services

- *View of Weather Stations and Wildfire Cameras*: to provide real-time awareness of conditions that may impact the customers in their jurisdictions.
- *One Stop Shop for PSPS Outage Information*: Continually updated, streamlined, consistent data and messages to keep them informed.



Avista PSPS Partner Portal resources & provisions

- *Secure Access*: The portal provides life support customer lists and a list and map of critical facilities in the area of the outage. This data is protected by double authentication to protect customer privacy.
- *Shareable and Searchable Historical Data*: to add with data requests.

The Portal is currently being developed and is anticipated to be in place prior to the 2026 wildfire season.

Firefighters

Avista has good relationships with the firefighting agencies within our service territory. These experts were helpful in formulating Avista's initial Wildfire Resiliency Plan (now known as Wildfire Mitigation Plan) and have continued to be crucial partners in the effort to reduce and mitigate wildfire risk. These partnerships have been created in part due to Avista's willingness to quickly respond to situations at the request of fire officials, such as opening fuses to shutoff power and protect the firefighters responding to a house fire or de-energizing transmission lines in order to protect firefighters responding to fires near the lines.

Avista consistently works with fire officials in Washington and Idaho to share information about our operations and what we are doing to decrease spark events from our equipment. We also solicit information about agency priorities and high-risk areas to better coordinate our fire mitigation activities with these experts. Avista is recognized as a partner with the major fire agencies and is invited to participate with them in pre-fire season planning meetings and post-fire season reviews as well as coordination during fire events and participation in their Incident Command Structures.

Avista is also an active participant in the Inland Empire Fire Chiefs Association. We were asked to join in their meetings to add input on critical infrastructure capabilities and needs during wildfire and other emergency responses, and our shared interests have kept us involved. This group includes the Fire Chief of the City of Spokane and the Chiefs of Spokane County as well as the Spokane County Department of Emergency Management and the Spokane County Sheriff's

Department. Along with information sharing, this relationship has brought a heightened awareness of how fire and emergency response is coordinated and how the utility can integrate into emergency response efforts.



Strategizing with firefighters

Large wildfire situations trigger a Fire Incident Command Structure (ICS). The ICS is a standardized approach to the command, control, and coordination of the fire response from beginning to end, allowing the various agencies responding to the fire to work together efficiently. It provides components such as common terminology, integrated communications, and a unified command structure over all the jurisdictions and personnel involved. Avista's strong relationships with fire professionals, strengthened by our work with them on the Plan, have brought them into our internal discussions and Emergency Operating Plan (EOP) processes and ensured that Avista is successfully engaged and integrated with them in any ICS situation. This teamwork approach helps our personnel understand what is expected of them and how they can assist and support fire command, from selectively de-energizing lines to protect firefighters to helping ICS understand where our infrastructure is located and potential impacts.

Key Safety Partners

As mentioned earlier, Avista hosts annual tabletop exercises with first responders each year, providing realistic situations that allow participants to experience and react to wildfire simulation events and practice response and joint engagement. We include external partners such as the Washington DNR, IDL, and the Red Cross as well as adjoining utilities. The exercises are designed to simulate an actual wildfire situation with a realistic scenario that the participants must react to. They go through this simulation as if it were occurring, including developing strategies around customer outreach, crew placement, damage assessment, mutual assistance requests, customer communications and support, and planned restoration efforts from the beginning of the scenario event until final restoration and return to normal operations. The teams then go through an after-action review to identify areas of strength and opportunities for improvement. These joint exercises strengthen our relationships and help us understand each other's roles in a wildfire event as we assess EOP practices, procedures, and communications against a simulated fire situation. Practice sessions allow participants to improve their performance and identify opportunities to advance capabilities in responding to actual events.

We have also been in communication with Washington State's Energy Resilience and Emergency Management Office, participating with them in their April 2024 PSPS workshop and inviting them to participate in our PSPS exercises. The two teams have developed joint communications protocols and processes around a PSPS event and believe we have a strong partnership in place.



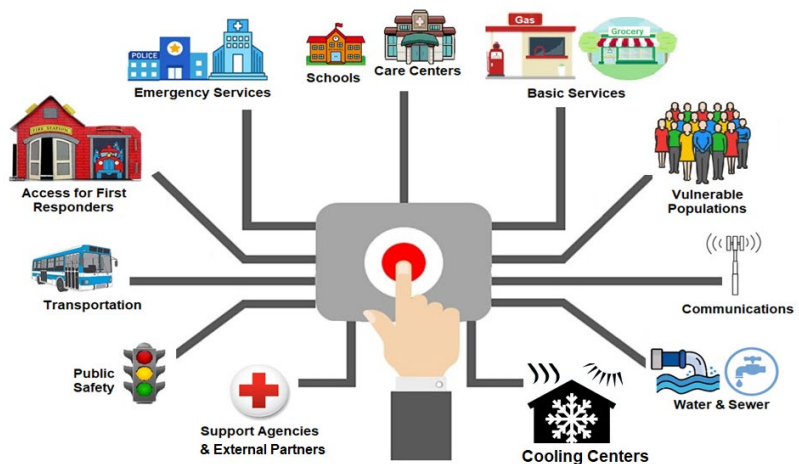
Some of Avista's partners

Interactions with these key public safety partners also include attending meetings to present and discuss each year's Wildfire Mitigation Plan (featuring PSPS), working with municipalities and agencies to identify critical infrastructure, updating the notification process (who, how and when) for Extreme FSM and PSPS, and working with some of these partners to identify locations for Community Resource Centers (CRCs) in the event of a PSPS.

With the addition of Public Safety Power Shutoffs (PSPS) to our plan in 2024, Avista reached out to all of these partners to communicate the changes. Avista responds to many requests for presentations from a variety of government and community groups. The Community Outreach Team conducts meetings with emergency managers across the service territory each year in addition to telephone town hall meetings with emergency management personnel, local leaders, and customers to update them on Avista's Wildfire Mitigation Plans.

Critical Service Providers

Avista's Regional Business Managers and Account Executives identify and engage with critical infrastructure and service providers in their areas (such as water, wastewater/sewer and healthcare facilities). Avista also identified commercial and industrial customers for notification during PSPS events Recognizing who these customers are, the critical services they provide to customers and to society, and



Some of Avista's critical service providers

where they are located makes it possible to do as much as we can to protect their energy supply and/or restore their service as quickly as safely practicable.

Other Utilities & Industry

Starting in 2019, Avista began organizing and hosting the Pacific Northwest Wildfire Working Group meetings. This group shares information on planning, mitigation strategies, and logistical constraints on a regular basis. Attendees in this meeting typically include Idaho Power, Portland General Electric, Puget Sound Energy, Northwestern Energy, PacifiCorp, and Chelan County Public Utility District, the Washington State Energy Resilience and Emergency Management Office, and others. These meetings have been helpful for all participants in understanding the components of neighboring utilities wildfire plans and the challenges that implementing them has brought. These engagements help us learn about and share best practices in our industry.

Avista is also involved with the Western Energy Institute and other national utility-based organizations to gain learning and information-sharing related to emerging issues pertinent to utilities. The risk that wildfire poses to utilities throughout the West is a central topic. Along with regular attendance, Avista has shared what we are doing in response to the wildfire threat, including presenting our Plan to this group in a formal setting, and has gained a better understanding of what other utilities are doing to address the same issues. This is another forum in which we can share and gain best practices.

Neighbors

We have reached out to neighboring counties in Washington and Idaho (each with their own emergency notification systems) to explore the potential for a similar partnership to help amplify Avista's PSPS communication plan and to collaborate with them to enhance community safety. At our annual Partner Forum we facilitate cross-jurisdictional collaboration and communication, conduct scenario-based discussions to test and refine communication protocols, and strengthen alignment across agencies, neighboring utilities, and Tribal nations for emergency response.

We also work with our neighboring utilities in sharing best practices, assisting with their wildfire plans and strategies, joint preparation for wildfire events (EOP participation), PSPS related communications and cooperative engagement, and during actual PSPS events. We share our camera and weather station feeds and our technology when possible. Our Town Hall events also include customers outside of our jurisdiction.

Coordination with Other Wildland Fire Protection or Mitigation Plans.

Avista's Wildfire Mitigation Plan is customized to our system and our customer base, though we have freely shared our Plan and our methodologies with other utilities (as well as our camera feeds, WUI map technology, Fire Weather Dashboard, and modeling). Each utility's plan is specific to them, their budgets, their manpower, their service territory, and their own goals and objectives. We integrate the

U.S. Forest Service models and datasets into our analyses as mentioned earlier, and we collaborate with them and others to support their wildland fire protection efforts in our service territory (such as our Fuel Reduction Partnerships). We coordinate with these agencies in their work, which is based upon their mitigation plans and strategies. Thus far we have not incorporated their wildfire plans into our own, but we are open to improvements as we learn of them. We further note that utility requirements, practices, and strategies may differ from those of the general industry, such as state forestry, due to the amount of regulation under which the utility must function as well as the focus on reliability and customer base.

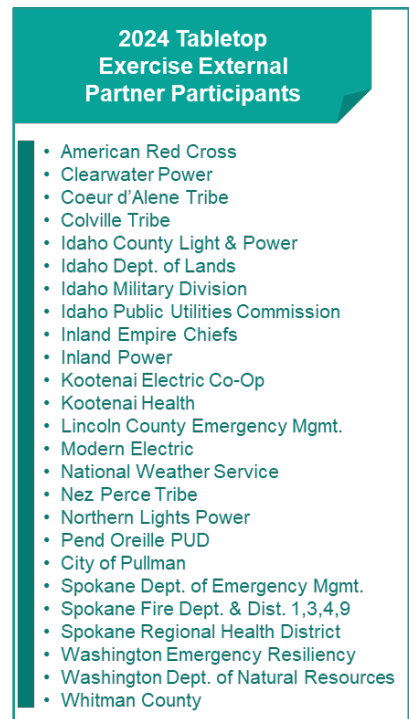
Avista collaborates with many diverse external parties in planning and executing our Wildfire Plan. These partnerships began in 2019 with the initial development of the Plan as we called upon outside experts to help us develop our wildfire risk reduction strategies, and we have continued to grow these partnerships and add to them over time. Some of these parties gain direct monetary benefits, such as the Safe Tree Program that replaces risk trees on customer private property at no cost to our customers or our work on fuel reduction with Bonner County's BonFire Program. Others have no cost associated with them but provide direct benefit, such as the Washington Dept. of Natural Resources calling upon Avista's Fire Weather Dashboard to help them strategically place firefighting resources across the state based upon the Dashboard's analysis of risk. Some partners join with us in fire risk reduction activities such as the Expedited Response contracts, others help prepare and support our customers and communities such as public health and safety agencies.

Operational Exercises

Avista is committed to ensuring that we take the necessary steps to mitigate the risks associated with wildfires. In addition to our Wildfire Mitigation Plan, we take seriously the need to create awareness in our communities and within our Company of our plans and processes for managing a PSPS. Internally, these exercises help to reinforce how we will respond to a PSPS, ensuring that employees understand their roles and responsibilities and that as an organization, we are able to respond quickly, safely, and efficiently, minimizing the impacts to our communities and our customers.

From 2023 to 2025, Avista conducted annual wildfire preparedness exercises to strengthen emergency coordination and test its Emergency Operating Procedures (EOP) and Public Safety Power Shutoff (PSPS) protocols. These exercises involved internal teams and external partners, including state agencies and emergency responders. Key outcomes included improved interagency collaboration, successful integration into the Incident Command Structure during the 2023 Gray Fire, and enhanced communication strategies. Each year's scenario built on lessons learned, refining Avista's wildfire response capabilities and ensuring readiness to protect communities and restore power safely and efficiently during wildfire events.

Further Insight into the 2025 Exercise. In 2025 Avista put together another realistic PSPS exercise for both internal and external partners. Although the parties knew the approximate day of the “event” (so they would be at their posts), they were not given any details until the event occurred. The two primary objectives for the 2025 exercise were to address mutual assistance requirements and to review the conditions, metrics, processes, and responsibilities for safely ending the PSPS. Avista's Wildfire Resilience team, Electric Operations, Corporate Communications, Customer Service, Account Executives, Regional Business Managers, Social Impact, System Operations, Distribution Operations, Legal and other support areas from across the company participated.



The 2025 exercise identified a total of 16 feeders/circuits that would be de-energized due to fire weather conditions combined with a weather event. Teams participated in real-time assessment discussions and executed their activation procedures, simulating communications, notifications, and other actions, as if they were real. They practiced communication and notification processes including media releases, notifications to emergency and community partners and customers. They also readied the resources and logistics to establish a Community Resource Center to provide support to impacted customers.

From an Operations perspective, the teams demonstrated the process for assessing the impacts and outages, determining resource requirements, and taking steps to secure additional resources to support restoration efforts. Once the wildfire conditions and the weather event had subsided and our PSPS thresholds began to dissipate, participants reviewed the roles and responsibilities for the decision making that would enable us to begin to re-energize, restore and return our system to pre-event conditions. After the exercise members met to discuss what worked well and identify areas of improvement.

GENERAL WILDFIRE PUBLIC OUTREACH AND ENGAGEMENT

Beyond our PSPS communications, a key element of our Wildfire Mitigation Plan is ensuring that all interested persons know that the plan is in place and that Avista is taking certain precautionary steps to reduce wildfire risk. A strong and effective strategic communications campaign is important in ensuring broad awareness and in demonstrating Avista's commitment to reducing the impact of wildfires. Avista's Wildfire communications plan is directed at Avista's key participants including customers, employees, state and local government officials and regulators, law enforcement and fire departments, local media, and shareholders. Our wildfire communications goals are to create awareness of Avista's work to reduce the risk of wildfires, promote the safety and well-being of our customers, and to engage customers in programs that impact them and their communities.

Below we discuss our general wildfire communication efforts and outreach. More of our communications strategy can be found in **Appendix F**.

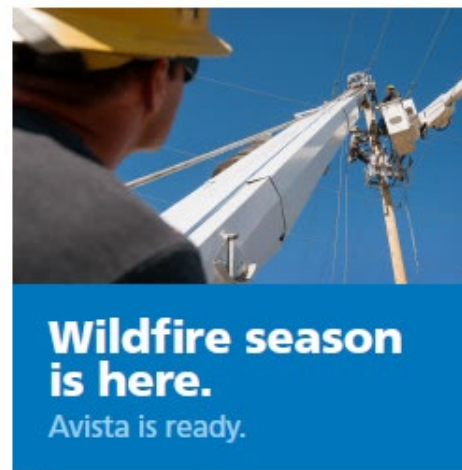
Avista Wildfire Communications

Avista's communication strategy is designed to build awareness of our wildfire mitigation efforts, foster trust, and promote customer preparedness. Key objectives include highlighting system investments, demonstrating our commitment to safety, and engaging customers in programs that impact their communities.

We tailor communications to each initiative, such as vegetation management, grid hardening, Fire Safety Mode, and PSPS, using a mix of channels: email, IVR calls, press releases, social media, outage map updates, and direct outreach. Customers are notified of nearby projects and potential outages through postcards, letters, phone calls, and local ads. For larger efforts, we host community meetings and town halls.

Outreach includes:

- **Avista Connections** newsletter articles and seasonal updates.
- **Customer emails** with wildfire safety tips and service alerts.



Dry vegetation and high winds increase the chances of wildfires. But Avista is doing our part to keep our system and communities safe.

We are partnering with property owners to remove or trim trees near our lines. We are making improvements to make our system stronger. And we are changing operations when hot, windy forecasts are predicted. In areas of higher risk, we can set the system to be more sensitive, meaning we don't try and reenergize automatically if something comes in contact with a line. We physically patrol the line when it's safe to make sure there is no fire danger before reenergizing.

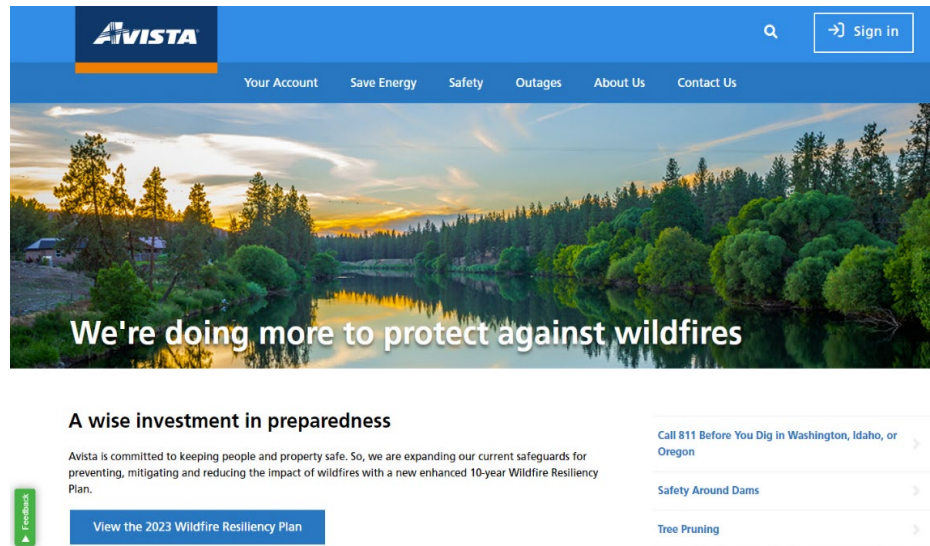
Our system is built to keep outages to a minimum but help us keep you informed. Log in and update your contact information on our website. Also sign up to receive power-outage alerts by text or mobile app.

Click the word "outage" in the top navigation to locate the page. We just want to keep you safe.

Learn more about our wildfire measures at myavista.com/wildfire



- **PSPS notifications** via email, IVR callout and media.
- **Telephone town halls** with local leaders and emergency personnel.
- **Print ads** in rural communities encouraging contact updates.
- **Community meetings** led by regional managers in high-risk areas.



Wildfire Community Engagement Team

In 2022, Avista created a subcommittee known as the Wildfire Safety & Community Engagement Team to develop an outreach framework. This team still exists today and continues to improve on the three key focus areas that they were provided in the beginning:

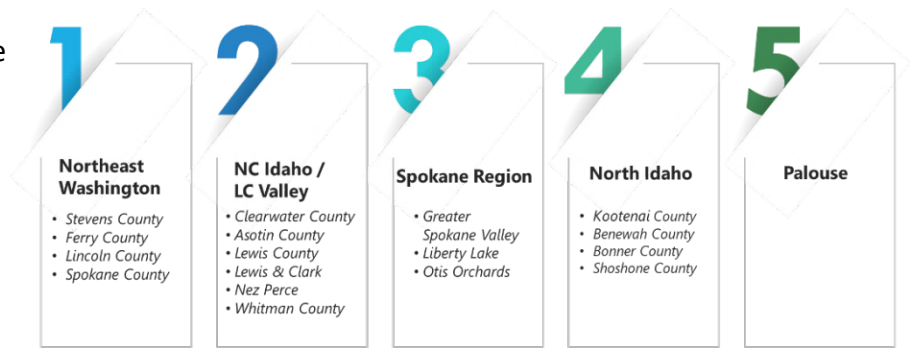
1. Develop a long-term outreach plan to educate communities about Avista's Wildfire Mitigation Plan, procedures, and Fire Safety Mode operations. PSPS outreach was added to the list in 2024.
2. Gather insights from communities on how we may better engage with them in the short-, mid- and long-term rollout of the Plan's deliverables.
3. Select a subset of community members to help Avista set the course to better inform and identify opportunities for future outreach and partnerships in public safety and engagement.

This team is composed of leaders that are responsible for the delivery of the existing Wildfire Mitigation Plan

through their support of our customers and the communities we serve. This includes Regional Business Managers as well as employee representation from Operations, Customer Solutions, Legal, Communications, Community Outreach, Social Impact, Tribal Relations, and Engineering.



This Team is committed to reinforcing key messages of the Wildfire Plan and reminding customers of the actions and investments Avista is making to reduce the risk of wildfires. They promote wildfire readiness along with key partners.



Regional Business Manager territories

Another Team goal is creating a list of key contacts within each WUI Tier 2 or 3 community, often community leaders or other individuals who will be educated about the Fire Safety Mode practices to help communicate with their communities in response to emergency situations related to Avista. They also built a strategy around expanded outreach to life-support customers during unplanned outages and standardizing the Town Hall outreach efforts to communicate more consistently. Another benefit of this Team is helping the Company determine the language needs in our communities in order to create multilingual options in our customer outreach materials.

In 2024 this team developed a consistent script to use for the Telephone Town Hall meetings. The Regional Business Managers send this script to area speakers (often non-Avista) that will be addressing Fire Safety Mode and PSPS. Corporate Communications provides handout materials. In addition, a PSPS video was created representing the four parts of the Wildfire Plan to share with external partners, fire agencies, customers, and others who have an interest in the Company's wildfire mitigation efforts. This team's ongoing efforts help ensure that our outreach is broad, inclusive, and comprehensive.

Equity Advisory Group

Avista is also working closely with its internal Equity Advisory Group¹⁶ to identify Highly Impacted Communities and Vulnerable Populations ("Named Communities") unique to the Company's service territory. According to Washington state, these are communities that are highly impacted by adverse socioeconomic conditions, pollution, and climate change, or who experience a disproportionate risk of environmental burdens. The identification of customer barriers, development of workable solutions, and implementation of an effective multilingual



¹⁶ This group is required by Washington State regulation, WAC 480-100-655(1)(b). <https://app.leg.wa.gov/WAC/default.aspx?cite=480-100-655&pdf=true>

communication strategy is an ongoing process but one that Avista believes to be important to the success of the Wildfire Plan as well as PSPS planning and implementation. Avista is steadfast in ensuring that all customers have access to programs and utility-related information especially related to safety. These efforts will continue to be reflected in our wildfire outreach efforts going forward.

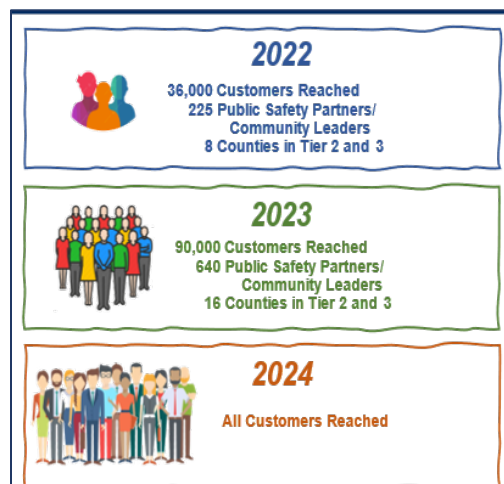
Community Response for Vulnerable Populations (CRVP) Group

Avista brought together a diverse group that includes nearly 40 representatives from organizations and agencies that serve vulnerable populations as well as municipal departments and emergency managers. The vulnerable populations represented by this group include refugees and immigrants, seniors and aging populations, folks with disabilities, limited-income communities, and those with elevated health risks. Avista invited the CRVP Group to attend a 2-hour workshop at our headquarters focused solely on wildfire at which we shared Avista's Wildfire Mitigation Plan, provided handouts on Public Safety Power Shutoff, and gathered information and feedback on how best to reach our vulnerable communities with this information. This group helps us communicate with and support the customers they represent, increasing our awareness of the needs in this area including additional language options or outreach requirements.

Town Hall Meetings

Each year Avista hosts annual Telephone Town Halls that serve as an important communication and engagement tool for a broad spectrum of interested parties. These live, interactive events are designed to reach Avista customers and customers in adjacent utilities' service areas.

Each Town Hall provides participants with the opportunity to join a live conversation about wildfire preparedness. Attendees hear directly from Avista's system operations staff and managers about the steps we are taking to reduce wildfire risk in the region. Additionally, our Public Safety Partners join the call to discuss emergency preparedness, coordination, and response efforts. Participants can ask questions in real time and engage in live polling, offering valuable feedback that helps shape our Wildfire Mitigation Plan and outreach strategies. These events are promoted widely through social media and community events, ensuring that anyone—regardless of whether they are an Avista customer or not—can sign up and participate.



Customers Reached through outreach events each year

Goals of the Town Hall meetings include sharing information on what communication to expect from the utility before, during, and after a PSPS event, to educate customers on Avista's efforts to reduce wildfire risk, and to explain our strategy with elevating system protection settings (Fire Safety Mode) during critical fire weather events. We also ask customers to update their contact information if they need specialized assistance.

Community and Local Leaders

Community leaders are a key part of providing customer level support. These leaders are invited to participate in Telephone Town Halls alongside Avista to help answer questions from their constituents and to gain the knowledge needed to lead customers through an outage event. They work together with Avista to prepare citizens for outages and to provide support and services. They assist us in identifying libraries, schools, and/or businesses where we are able to host Community Resource Centers for customers during PSPS events. They also provide Avista with a primary contact for PSPS events in communities or neighborhoods.

Dear Customer,

In response to dry summer conditions and increasing wildfire danger in the region, we are applying temporary changes to power line operations in our Washington and Idaho service areas. We have implemented this operational change, now called Fire Safety Mode, for over 20 years.

A key part of our wildfire strategy is the use of Fire Safety Mode, which adjusts how the system responds to faults during high-risk weather. Unlike normal operations, where lines may attempt to re-energize automatically, Fire Safety Mode keeps lines de-energized until crews confirm it is safe to restore power. While this may extend outage times, it significantly reduces the risk of ignition.

"Wildfire preparedness is not just a seasonal effort—it's a year-round responsibility," said Heather Rosentrater, CEO of Avista. "We've invested in infrastructure, technology, and operational practices that help us respond to changing conditions and protect the communities we serve. Our focus on safety is foundational to all we do."

Since launching our Wildfire Resiliency Plan in 2020, we have completed numerous grid-hardening projects in high-risk areas. These include replacing wooden transmission poles with steel, installing fire-retardant mesh at pole bases, and upgrading wooden crossarms to fiberglass. In certain areas, we will be converting our overhead powerlines to underground service to further reduce the risk of wildfire. We have also expanded vegetation management to reduce the risk of trees contacting power lines.

In the most extreme conditions, we may implement a Public Safety Power Shutoff (PSPS) a targeted, temporary outage in areas facing severe wildfire risk. PSPS is a last-resort measure, used only when weather conditions such as high winds and low humidity create a heightened threat. Avista crews patrol affected lines before restoring power, and Community Resource Centers may be activated to support customers during extended outages.

What you can do:

- Make sure your information is up to date with Avista. We want to be able to reach you about potential outages. Visit myavista.com to update your account information or call customer service at (800) 227-9187.
- Let us know if you have medical devices that rely on electricity. Your information will be added to a list of customers who receive extra notifications in case of an extended outage. Learn more at myavista.com/medicalequipment.
- Be prepared for outages. Keep your emergency supplies together in one place, like flashlights and back-up portable chargers. Make sure you have a few days' supply of shelf-stable food and water for all people and pets in your home. Learn more at myavista.com/outages to create your own to-do list in case of an outage.

Avista will return the distribution system to normal as soon as weather permits and fire potential decreases. We appreciate your patience and understanding during this time.

You can read about our plans and how you can be prepared at myavista.com/wildfire and **watch our video** below to learn more.

Avista notifies customers when we enter Fire Safety Mode operations

Community Response Ambassadors

In 2023 Avista launched an employee team of volunteer Community Response Ambassadors who train with the Red Cross to provide help and support to our most vulnerable customers, especially during outage events. These volunteers also staff our Community Resource Centers to help customers during PSPS events.

Community Events

Avista attends community events throughout our service territory sharing the message around our Wildfire Plan mitigation efforts and Public Safety Power Shutoffs, distributing materials on wildfire resiliency and PSPS, and answering questions. In 2024 and 2025 we met with several county local emergency management organizations, County Commissioners, cities, fire professionals, public health providers, schools, the Red Cross, Tribes, critical service providers, and more. We attend a variety of safety fairs and public events across the service territory. This includes providing presentations to various groups and organizations and hosting an information booth at events, providing the opportunity to interact with a host of community service providers. For example, in 2024 we attended the Community Response for Vulnerable Populations event, which includes Spokane County, Spokane Transit Authority, Washington State Dept. of Transportation, Spokane Regional Health District, Aging and Long Term Care of Eastern Washington, Spokane Neighborhood Action Partners, Disability Action Center Northwest, and the International Rescue Committee.



Vulnerable Customer Outreach

In 2022 we began an effort to better identify and support our most vulnerable customers. Avista makes a concerted effort to help overcome customer barriers and utilize a multilingual and multichannel communication strategy to reach these customers, including engagement with community support organizations across the service territory that help us identify needs and gaps. Avista also has a specialized Customer Assistance Referral and Evaluation Services (CARES) team within the customer contact center who provide specialized support to customers, specifically connecting customers with resources such as food, housing, and medical care as well as providing direct support during PSPS events. Medically vulnerable customers may be provided with battery backups or advanced notice on outages as discussed above in the PSPS communications section of this report.

Specialized Outreach

Our communications have evolved over time as we continue to learn more about our customer base and how to reach more people with our preparation and safety messages.

We have identified that 5% of Avista customers speak a primary language other than English, and of those, 95% speak Spanish as their primary language. In response, Avista developed a variety of materials in Spanish which are distributed through our outreach channels and community events.

Avista's Website
Telephone Town Halls
Ad Campaigns
Spanish Publications
Outage Map
Printed Materials
PSPS Outreach
El Mercadito Booth

Spanish-specific outreach

We are also working on including additional languages. In 2024 Telephone Town Hall events offered either Russian or Spanish. There were 79 customers that identified as Russian, and for Spanish, 1,192 customers, providing a total of 1,271 non-English speaking customers. We also have a language line option for customer service so that customers can speak to someone in their own language.

Another specialized focus is for those with hearing impairment. For example, our wildfire related safety videos are subtitled. We are working with the Washington State Dept. of Social and Health Services (DSHS) and the Office of Deaf and Hard of Hearing to further our outreach to this audience and learn how to best translate our messages into American Sign Language. Avista presented its then-Wildfire Resiliency Plan to approximately 80 staff from DSHS and then collected feedback and answered questions, especially related to customer support around potential PSPS events. Avista is remaining in contact with DSHS to continue to refine and improve our communications in this area.



Avista outreach materials

LESSONS LEARNED & PLAN UPDATES

The Idaho Legislature and Commission requested that we provide:

“An update of lessons learned from the previously approved WMP within the annual filings for WMP review and approval.”

Avista’s Wildfire Mitigation Plan (formerly known as Wildfire Resiliency Plan) is built upon the concept of Plan-Do-Check-Adjust. We are continually evaluating the efficacy of our programs and updating and revising strategies to incorporate lessons learned, new information related to fire risk, utility best practices, and in response to feedback from customers, agency partners, regulators, and others including fellow utilities. Avista adapts business strategies, plans, and processes to align with changing business and physical climates. Many of our improvements have involved enhanced customer engagement and support, constant work to improve our modeling, risk analysis, and technology, incorporating new technologies such as wildfire cameras and digital data, increasing customer protection measures such as Public Safety Power Shutoffs, and refining practices related to our Fire Safety Mode operations. Some recent improvements made are listed below. Details about them can be found within the body of this report.¹⁷

Communications

- Increased and enhanced our wildfire-related customer communications efforts, specifically with customer engagement activities such as the town hall meetings, which have been expanded to all 16 counties in our service territory.
- Added additional language options (with Spanish being a focus based on our customer base) to our communication outreach, as well as translating our messages into American Sign Language and providing subtitling to allow us to reach more customers. We continue to research customer communication needs and how to reach as many as we can.
- Lessons in communications involving Fire Safety Mode (FSM) and PSPS were learned in 2024 as we experienced our first PSPS event. Our interactions with customers helped us see that our engagements with them on both of these issues was causing confusion. We have refined our communication plan to only notify customers during PSPS outage, when power will inevitably be lost.
- Updated our PSPS tabletop exercises to include more parties including first responders and emergency responders who serve both Avista service territory and adjacent utility service areas, land management agencies that respond across both Avista’s service territory and contiguous jurisdictions, and Tribal governments and Tribal emergency response personnel.

¹⁷ Note that this information is more extensive due to this being the first of our new Wildfire Reports as aligned with legislative edict, and the first time many in the broader audience will have seen it. Going forward this will be limited to the year-to-year enhancements and improvements.

- We are in the process of adding a Partner Portal, an automated communication system related to Public Safety Power Shutoff events. The functionality of this portal is described in above sections

Customer Support

- Created a Community Response for Vulnerable Populations During Outages (CRVP) Group which includes nearly 40 representatives from organizations and agencies that serve vulnerable populations (as well as municipal departments and emergency managers) to inform them of our Wildfire and PSPS plans and strategies and to gather information/feedback on how best to reach our vulnerable customers with this information as well as working with them to develop strategies on how we can jointly support the people they serve through PSPS events.
- Supplemented support for our most vulnerable customers using our Customer Assistance Referral and Evaluation Services (CARES) Team, a specialized team within Avista’s customer contact center that focuses on this work, acting as a liaison between the customer and community partner support networks. This includes specialized outreach to life support customers with the Battery Backup Program and through direct contact with them if a PSPS event is possible, even including sending local first responders to their homes if they cannot be reached.
- We also launched an employee team of volunteer Community Response Ambassadors who trained with the Red Cross to provide additional help for customers, especially during outage events. These volunteers also staff the Community Resource Centers.
- Developed outreach specific to area Tribes, including working with them to identify their specific needs and vulnerable populations including Tribal elders and medically vulnerable Tribal members to help support them in case of an extended power outage. Working with them to identify Community Resource Center locations in their areas.
- Worked with Avista’s Equity Advisory Group to fully develop and identify Highly Impacted Communities and Vulnerable Populations (“Named Communities”)¹⁸ unique to the Company’s service territory to allow working through the barriers specific to this customer group in wildfire education, preparation, and support.
- Avista’s Social Impact Team has become an integral part of PSPS events, acting as the primary liaison between customer support partners and Avista. This team provides timely updates and

¹⁸ Washington State Department of Health, “Instructions for Utilities to Identify Highly Impacted Communities,” [Instructions for Utilities to Identify Highly Impacted Communities | Washington State Department of Health](#) Idaho overburdened and underserved areas can be found on the Climate and Economic Justice Screening Tool: [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#)

information sharing specifically related to customer support agencies. They actively educate these partners about Avista's wildfire efforts, Fire Safety Mode operations, and Public Safety Power Shutoffs to help ensure community resilience and customer support. They also help the agencies align resources with real-time community needs during an event. They also deploy the Company's Community Resource Ambassadors to Community Resource Centers and coordinate this with the Red Cross. They ensure that all of the needed resources are deployed.

- Developed the ability to quickly identify and contact life support customers for specialized support and outreach by adding a life support customer flag to all the feeder lists. This allows Avista to proactively call these customers to make sure they are aware of wildfire threat and potential outages and provide options for support.
- Created a program to provide a battery backup power system to customers who have been verified through their primary care physician as having 24-hour dependency on medical equipment, greatly decreasing the unique impact of a PSPS on these customers.
- Completed identification of critical commercial and industrial customers and service providers for notification during elevated Fire Safety Mode protection settings or in the event of a PSPS. These are customers who provide critical support services to society such as police and fire stations, large airports, traffic control, communication towers, etc.
- Implemented a comprehensive PSPS outreach program. In 2024 the Company reached out to over 14,000 first responders, emergency managers, critical customer groups, service providers, healthcare organizations, city and county leaders, state agencies, and others to provide education around our PSPS Plan and to strategize about protecting and supporting customers through potential outages, both across our service territory and in contiguous jurisdictions.

Improving Tools & Technology

- Continually improving the inputs to our WUI map by updating information we use from the USDA (both the Housing Unit Impact and the Wildfire Hazard Potential data as mentioned previously) to help us more clearly and specifically include structural and human impact as well as areas where fires may be particularly difficult to control. This new data further enables our ability to identify the areas of highest risk in our service territory. It is updated into our model as it is updated and becomes available.
- In acquiring digital data for both the transmission and distributions systems to identify risk trees, we are becoming familiar with the large amount of data these tools provide and how to use all this information to focus our vegetation efforts in areas that should provide the most positive impact and risk reduction. We believe that these tools are helping us plan vegetation work in

the areas of greatest need with accuracy in a more precise and predictable way, streamlining our vegetation management programs and helping to maximize their value.

- **Risk Model – Cost/Benefit Modeling.** We are in the process of developing a comprehensive wildfire risk modeling decision support tool. This tool can calculate risk reduction more accurately than our existing Dashboard by including scenario planning and a matrix of treatment solutions. It will incorporate asset fragility analysis, probability of ignition, fire consequence modeling, the valuation of economic impacts, and finally, monetizing the value of wildfire-related mitigation techniques such as grid hardening, PSPS, increased vegetation management, and/or combinations thereof. A new dashboard using near real time weather data will be available during fire weather season to make more informed decisions. It will also provide cost/benefit analysis for each of our wildfire programs. Information from this tool should be available during the first quarter of 2026.
- The use of drones in assisting with inspections and patrols, especially after a PSPS event, helped speed up the process, especially in areas where it is difficult to get vehicles to the structures to have eyes on the situation.
- We learned the value of weather stations located near extreme weather events, as they provided real-time information that helped us gauge the intensity of weather events that lead to increased fire risk and to improve our decision-making around whether to implement a PSPS.¹⁹ In 2025, we began the installation of utility owned weather stations across our network.
- 10 cameras were installed in 2024 with 5 more installed in 2025. The advanced notice afforded by these cameras increases the likelihood of timely containment and suppression of wildfires, saving lives and reducing property losses. They are valuable in quickly identifying a fire start as well as its precise location, enabling resources to be dispatched directly to the latitude and longitude of the smoke so firefighters do not have to search for the fire, saving valuable time. We partnered with the Washington Dept. of Natural Resources and the Idaho Dept. of Lands in identifying locations for wildfire identification cameras in high-risk areas of our service territory.

New Programs & Strategies

- Avista initiated our first wildfire-related undergrounding project in 2025, selecting a feeder in Southeast Spokane, just outside the city limits but in a WUI Tier 3 high-risk fire area, to better understand how the undergrounding process would work. This feeder was on the Company's "risk list" and was placed into Fire Safety Mode multiple times in 2022 and 2023, providing proof of its hazardous status. It serves about 190 customers in a semi-rural area, with 11 miles of two and three phase laterals. When this project is completed in the fall of 2025 we expect to

¹⁹ Until our local weather stations are fully operational, we have deployed handheld devices with field personnel to capture weather information.

learn the actual average cost per mile, complexities around right-of-way and permitting processes, constraints, impacts, and more.

- In 2025, Avista is rebuilding a section of distribution line in a high fire risk area to learn about the construction, cost, constraints, etc. of adding covered conductor to our distribution system. We should be able to report on this project in 2026.

Expanding & Improving Existing Programs

- Extended our Safe Tree Program, which works with customers directly to remove risk trees on their property, into all WUI 2 and WUI 3 areas across the service territory and added a platform to the Company's website for this program. The website allows customers to request Safe Tree work directly (if they are qualified), communicating with arborists directly to schedule this work at their convenience.
- Beginning in 2026, Avista will begin using Aerospace Technical Services (ATS) as a decision-support tool to enhance wildfire preparedness and response. ATS will help model potential fire scenarios, evaluate system vulnerabilities, and inform operational decisions such as PSPS implementation and resource deployment. This data-driven approach will strengthen our ability to anticipate risk, improve coordination, and refine mitigation strategies. Prior to the start of fire season in 2026, the new model will be integrated into our processes and will replace the existing wildfire dashboard.
- Created a strategy to prioritize steel transmission pole replacements in the highest risk areas based on a spectrum of inputs including actual historic fires and topography, moving beyond utilizing WUI zone alone.
- PSPS – We initiated our first PSPS in 2024. The lessons learned from that experience are detailed in the PSPS plan attached as Appendix A.
- For the 2025 wildfire season, Avista added non-reclosing protection schemes as well as de-energization of 115kV transmission lines during critical fire weather conditions. See Appendix A
- Enhanced Transmission Grid Hardening –The Company is prioritizing remediation work found during routine inspections of the transmission system with wildfire funding to accelerate maintenance issues that are identified.

Operational Improvements

- We are continuing to refine and enhance Fire Safety Mode operations to provide a comprehensive scale of risk reduction based upon actual conditions. We are utilizing actual

experience to refine and improve our understanding of when to employ fire safety mode settings.

- Developed a robust Emergency Operating Procedure (EOP) related specifically to PSPS. Created realistic EOP annual tabletop exercises that include external partners, such as the Red Cross, Washington DNR, and IDL to practice wildfire response in a coordinated, consistent, efficient manner.

Enhancing & Expanding Partnerships

- Through Expanded the Fuel Reduction Partnership program beyond Washington state to include engagement with the IDL, the U.S. Forest Service, the Nez Perce Tribe, and local and regional fire agencies across our service territory.
- By engaging with first responders such as the Washington DNR and the IDL, we created Expedited Response Agreements that cover nearly 99% of our service territory.
- Continuing to actively seek out and build valuable partnerships and connections to support our wildfire efforts with both external partners and customers, including working with and learning from our utility peers to strategize and develop best practices.
- Through development of our Partner Forum, PSPS tabletop exercises, and, in 2026, our Partner Portal, we continue to enhance communications with external partners, critical service providers, and customer support partners, especially during outage events.

Verifying Our Programs

- Worked with a third party to validate the effectiveness of our Vegetation Management Programs and to increase efficiency in our vegetation management cycle for our service area. This analysis determined that Avista has a reasonable and responsible approach which is aligned with “best-in-class” vegetation programs of other major utilities, and that our one-year Risk Tree inspection cycle is aligned with industry best practices, as are our WUI Tier designations. More information about this study can be found in the Vegetation Management portion of this report.
- Worked with a third party to perform a cost-benefit analysis of undergrounding existing overhead distribution facilities in high fire risk areas. The analysis included assessing criteria including customer impacts and outage and other costs related to undergrounding existing overhead conductor in areas identified as being at high risk. The details of this study are located in the Distribution Grid Hardening part of this report.

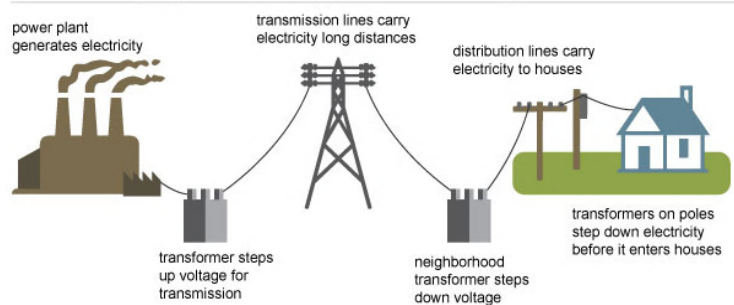
GLOSSARY OF TERMS

Asset: Electric lines, structures, equipment, or supporting hardware in the service of providing electric power to customers.

Brush: Refers to vegetation dominated by shrubby, woody plants or low growing trees.

CARES: Customer Assistance Referral and Evaluation Services is a specialized team within Avista's customer contact center that supports our most vulnerable customers, assisting with resources such as food, housing, medical care, and battery backup systems.

Circuit: The path for transmitting electric current from the device that creates the current (generator) across all associated equipment (such as the wire or conductor, switches, transformers, breakers, etc.) to the end user, as shown in the graphic.



Circuit Recloser: A circuit recloser is an automatic switch that shuts off power when a fault is detected and restores it if the issue clears. With communication capabilities, it can be remotely monitored and controlled. During high fire risk, Avista can configure reclosers to stay open after a fault, preventing re-energization and reducing ignition risk.

Community Response Ambassadors (CRA): An Avista employee team of volunteers that support Community Resource Centers in the event of a PSPS.

Conductor: The wires or lines suspended from towers or poles that help electricity to pass from one location to another, generally made of aluminum reinforced with steel or composite materials, though some low and medium voltage conductor is made of copper.



Critical Facilities/Infrastructure: Essential services and systems vital to public safety and utility operations, including emergency services, healthcare, water, communications, and key grid components. These are prioritized for power restoration during outages.

Crossarm: A crossarm is a piece of hardware providing an attachment point for insulators to support the loading of overhead conductors. The crossarm is typically made of wood, steel, or fiberglass.



Transmission crossarm

Cutout: A “C” shaped insulated device with a tubular fuse that disconnects part of a power line when current exceeds safe levels. It helps isolate faults, enables maintenance, and prevents outages from spreading.

Cycle Trimming: A routine vegetation management practice where sections of the electrical system are inspected and trimmed on a rotating basis. In higher-risk areas, additional inspections may be added to identify and address potential wildfire hazards.

Dispatcher: A person who coordinates outage response by confirming locations, assigning crews and equipment, and sharing information to support effective repairs.

Distribution (DX): Electric facilities that have a voltage that is 60 kV or lower.

Distribution Automation: Part of Avista’s Wildfire Program, this initiative upgrades grid devices to support remote monitoring, automated operation, and dynamic protection settings during fire season.

Distribution Grid Hardening: Avista’s program to strengthen power lines in high fire-risk areas by upgrading materials, replacing aging infrastructure, and reducing ignition sources through targeted improvements like wildlife guards, modern conductors, and selective undergrounding.

Distribution Infrastructure Upgrades: Improvements to Avista’s distribution system aimed at reducing spark risk and increasing resiliency. These include replacing aging or spark-prone equipment, installing wildlife guards, and using more fire-resistant materials. Also referred to as Distribution Grid Hardening.

Dry Land Mode (DLM): Renamed Fire Safety Mode.

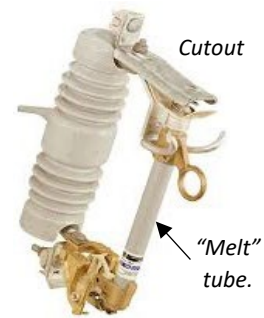
Elevated Fire Threat Areas: These are WUI Tiers 2 and 3.

Emergency Operating Procedures (EOP): An internal command structure that shifts normal operations to emergency response.

Equity Advisory Group: Avista’s specialized team that is working specifically with vulnerable customers and Named Community members to identify barriers and develop workable solutions for their needs, including multilingual communications and ensuring accessibility to programs and materials.

Expedited Response: In Avista’s Wildfire Plan, this is an agreement with state, local, and regional firefighting agencies to send fire crews directly to the site of a transmission trip during fire season event so if the fault results in a fire, it is managed immediately.

Extreme Wildfire Risk: This means that based on existing weather and vegetation conditions, a large, rapidly growing wildfire is possible should ignition occur.



Fault: A fault is an abnormal condition present on the power system, usually a short circuit caused by lightning, tree contact, windblown object in the lines, or other similar problem.

Fault Reduction: Reducing the number of electrical faults by strengthening infrastructure through reliability programs, especially in areas with higher wildfire risk

Feeder: A distribution circuit originating from a substation, consisting of a three-phase main line that branch into laterals delivering power to customer service lines. Avista uses short main trunks with longer laterals to efficiently serve customers.

Fire Behavior: The manner in which a fire reacts to the influences of fuel, weather, and topography. Fire behavior provides an indication to firefighters on how to best battle the blaze.

Fire Behavior Index: A scale that captures fire severity as a function of flame length (intensity of burn) and rate of spread.

Fire Front: The part of a fire within which continuous flaming combustion is taking place. The fire front is usually assumed to be the leading edge of the fire perimeter. In ground fires, the fire front may be mainly smoldering combustion.

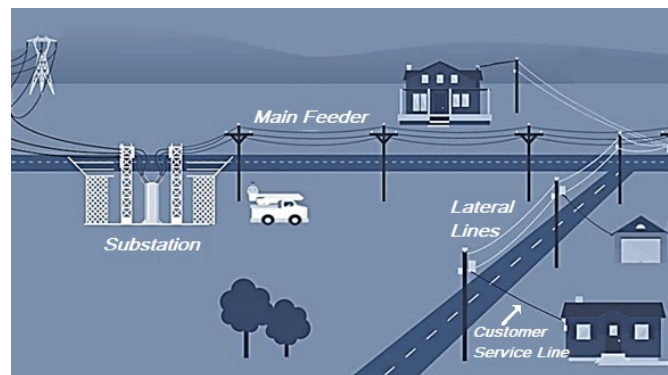
Fire Ignition Events: When a spark is created by the interaction of utility equipment and its surroundings (such as when a tree falls into a powerline) and results in a spark that, under certain circumstances, could become a fire.

Fire Mesh Wraps: wire mesh treated with intumescent graphic that, when exposed to extreme heat, rapidly expands to form a barrier between the fire and the wood pole. These wraps help prevent low-burning fires from accessing wood poles, protecting them from damage or destruction.

Fire Perimeter: The entire outer edge or boundary of a fire.

Fire Risk Potential: This incorporates weather and fuels information to rate the overall fire threat at a particular location as well as a fire's likely behavior should one start.

Fire Safety Mode (FSM): Formerly called Dry Land Mode, Fire Safety Mode is a non-reclosing distribution protection scheme used during summer fire season Under Fire Safety Mode operations, reclosing is limited or not allowed to help prevent equipment from failing and creating a spark, thus focusing on safety.



A piece of fire mesh wrap

Fire Safety Mode Automation: Avista’s plan to upgrade midline and substation devices determined to be in elevated fire risk areas to enable these devices to be operated remotely and automatically in response to fire situations.

Fire Safety Mode Ready Devices: Midline and substation devices located in high-risk fire areas that have been upgraded or replaced to allow protection settings to be operated remotely and automatically in reaction to wildfire or wildfire risk situations.

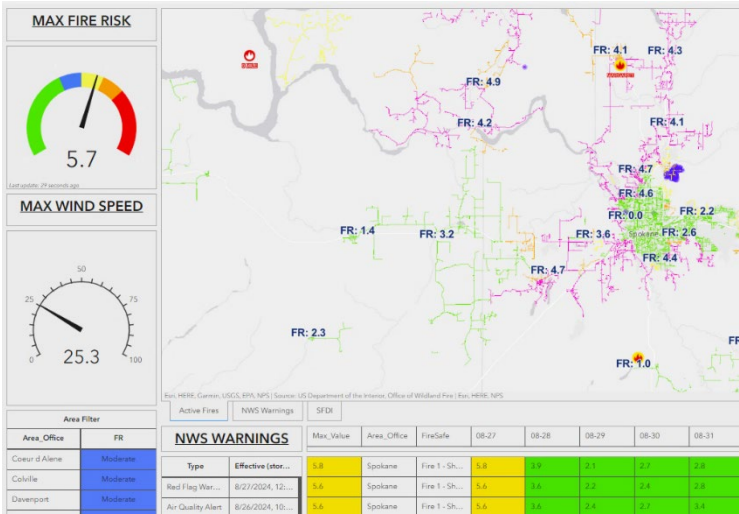
Fire Season: The time of year that wildfires are most likely to take place for a given geographic region due to seasonality, historical events and weather conditions, vegetative characteristics, etc.

Fire Threat Areas: Areas which have higher likelihood of impacting people and property and where additional action may be needed to reduce wildfire risk. Threat level is based on elements such as population, topography, vegetation type, and historical fires in the area.

Fire Threat Conditions/Fire Danger Rating: This considers current and antecedent weather, fuel types, and both live and dead fuel moisture to estimate the likelihood of a fire occurring as well as potential fire behavior should a fire occur.

Fire Weather: Weather conditions that influence fire risk, ignition, behavior, and suppression.

Fire Weather Dashboard: This is Avista’s primary means of determining fire risk across our system. It is a risk-based computer program that combines the 7-day weather forecast with equipment performance and fire risk levels based on time of year, drought conditions, type of vegetation and moisture levels, sustained winds, wind gusts, and more. It indicates the risk level on each of Avista’s distribution circuits for the upcoming week and highlights the maximum expected daily risk for every feeder on Avista’s distribution and transmission systems.



Fire Weather Dashboard screenshot

Fuel: Combustible material. Includes, vegetation, such as grass, leaves, ground litter, plants, shrubs, and trees that feed a fire.

Fuel Concentration/Density: Mass of fuel (vegetation) in an area which could combust in a wildfire.

Fuel Management: Removing, thinning, or otherwise altering vegetation to reduce the potential rate of propagation or intensity of wildfires.

Fuel Moisture Content: Amount of moisture in a given mass of fuel (vegetation) measured as a percentage of its dry weight.

Fuel Reduction: Manipulation, including removal of fuels (vegetation management) to reduce the likelihood of ignition and/or to lessen potential damage and resistance to fire control.

Fuel Reduction Partnerships: In Avista's Wildfire Plan, this is partnering with external land management agencies, leveraging funding to remove fuels near Avista facilities. Sharing the cost allows both parties to do more work than each could accomplish with individual budgets.

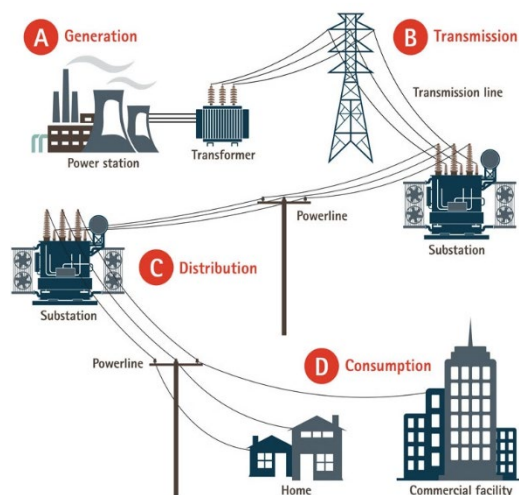


Fuel Reduction Efforts

Fuse: A device that limits the amount of current flowing through the circuit. The fuse is constructed with a small piece of metal that, when exposed to high current typically caused by a fault, melts and interrupts the flow of electricity. Fuses are typically placed on lateral tap lines off the main circuit.

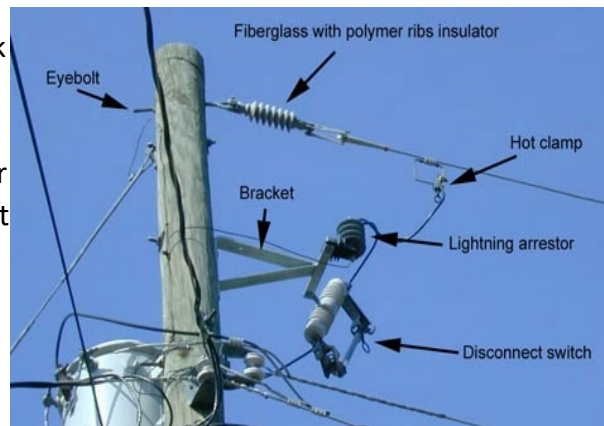


Fuse



Grid: A network that generates, transmits, and distributes electricity to consumers. It is a complex system of power plants, transmission lines, substations, and distribution networks that ensures a reliable flow of electricity from generators to homes and businesses.

Grid Hardening: Actions such as equipment upgrades, maintenance, and planning, taken in response to the risk of undesirable events (such as outages or wildfires) or undesirable conditions (such as old or unreliable equipment) of the electrical system in order to reduce or moderate those events and conditions based on relevant risk drivers or factors. This is a way of providing reliable energy for customers. In the Wildfire Plan, this specifically means adapting transmission and distribution materials and construction to minimize the potential for utility-involved fires in addition to protecting utility infrastructure in the event of a fire.



Herbicides: Typically used on the right-of-way to control incompatible tall growing species and noxious weeds. For the past several years, at Avista herbicide applications have primarily consisted of treating the stumps of fast-growing deciduous trees after they are removed to prevent resprouting. These applications are recorded within the same work records as the tree removals which are generally categorized as risk tree work.

High Canopy: Forested areas with tall, mature trees. In these types of areas, fire can spread from the ground into the tree tops, where it becomes difficult to control. In relation to utility infrastructure, this high fire can access the tops of poles and structures and burn them down to the ground. Thus, replacing more burnable wood poles with steel helps protect poles from this type of high level fire.



High Canopy Fire near the Noxon-Pine Creek transmission line in 2023

High Risk Fire Areas: Areas in Avista's service territory that have been identified as having increased risk for wildfire and associated damage; locations in wildland urban interfaces (WUI zones) for which there is little or no fire protection (typically rural or remote areas), or which have experienced historic wildfires. The Company includes several factors in determining areas of high risk, as described in the WUI section of this report.

High Wind Advisory or Warning: Level of wind risk from weather conditions as declared by the National Weather Service (NWS). The difference between a high wind advisory and a high wind warning is the level of winds associated with the event. Advisories go into effect for sustained winds of 40 mph or less with gusts of at least 45 mph. Warnings are issued if sustained winds are above 40 mph and gusts are 50 mph and above.

Highly Impacted Communities: As defined in Washington State, highly impacted communities must meet at least one of the following criteria: are within the limits of a reservation, and/or suffer

environmental health disparities such as pollution, hazardous waste, poverty, or cardiovascular disease.²⁰

Hot Line Hold: A hot-line hold is an assurance to the utility worker that an automatic protective device has been set to not reclose in the event the line or equipment becomes de-energized, typically used when line crews are working on a powerline or power equipment issue. With a hot line hold, the applicable device will not be re-energized until the appropriate dispatcher determines workers are in the clear. A hot line hold pertains to energized lines or equipment. In this configuration, auto reclosing is disabled, and instantaneous tripping is enabled to protect workers.

Hot Tap: This is a connection to the utility's powerline. It is typically used to link transformers to power lines, for making distribution connections at line taps, making repairs, and creating attachments. The traditional hot line tap is attached via a bolt. These connectors allow adding new service connections, bypassing lines, or making repairs. Avista is adding wedge connected stirrups which attach in such a way that if the connection loosens or if the stirrup melts, the conductor is held in place and does not fall to the ground.



Hot Tap Connectors

Incident: In the wildfire arena, this is a human-caused or natural occurrence, such as wildland fire, which requires emergency action to prevent or reduce the loss of life or damage to property or natural resources.

Incident Command Structure (ICS): The combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure to effectively manage an incident. The ICS provides a standardized approach to the command, control, and coordination of emergency response, providing a common hierarchy within which all responders (including Avista) can work together.

InciWeb: This is the Interagency All-Risk Incident Information Management System that provides a single source for fire incident related information and a standardized reporting tool for public use. Fire information is available for events across the U.S.

Infrastructure: This refers to the equipment Avista utilizes to



²⁰ Washington State Dept. of Health, "Instructions for Utilities to Identify Highly Impacted Communities," [Instructions for Utilities to Identify Highly Impacted Communities | Washington State Department of Health](#)

serve customers, including poles, transformers, conductor, switches, substations, etc.

Inspection: The act of examining utility assets, equipment, or infrastructure to assess their condition, functionality, compliance with standards or regulations, including encroachment concerns from vegetation or other external sources. May be performed via foot, vehicle, or aerial.

Insulator: Insulators keep the electrically charged line from touching the poles or towers so the line can continue to transmit and is not grounded. Insulators must be strong enough to withstand the weight of the conductor and the potential stress of the electricity wanting to connect to the earth. They are designed to be non-conducting, Many insulators are designed with an umbrella or petticoat at the top to keep the lower part insulated from the rain.²¹



Strings of transmission insulators, sometimes called bells



Dead-end Insulators

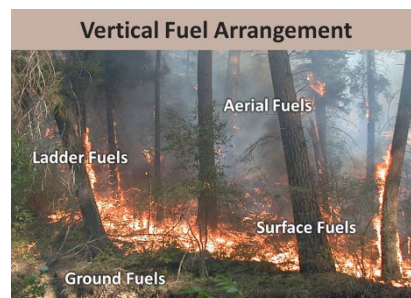
Insulator Pin: This is a piece of overhead hardware that fastens the insulator to the crossarm. The insulator pin is bolted through the crossarm and the insulator is screwed onto the top of the insulator pin.



Insulator with pin

IVR: Interactive Voice Response is a technology that allows telephone users to interact with a computer-operated telephone system with voice recognition technology. It allows automatic call distribution, allowing the Company to reach out to multiple customers at the same time.

Ladder Fuels: Fuels which provide a vertical path between the ground and higher vegetation, allowing fire to carry from surface fuels into the crowns of trees or shrubs with relative ease. These fuels help initiate and assure the continuation of crowning where the fire spreads very rapidly from treetop to treetop, becoming much more difficult and dangerous to control.



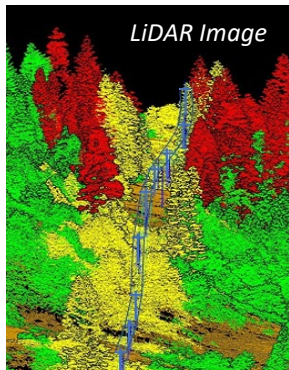
Ladder Fuel Diagram

²¹ For additional information, see: [Glossary of Insulator Terms \(insulators.info\)](http://insulators.info)

Lateral: In the distribution system, these are lines that break off from the main feeder trunk (that comes out of the substation) to deliver electricity to customers (service lines). The laterals normally have fuses to separate them from the mainline if they are faulted.



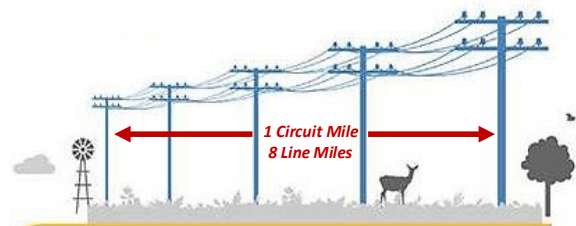
LiDAR: Light Detection and Ranging, sometimes called 3-D laser scanning, which can be used to make high resolution representations of the earth's surface. At Avista it is used on the transmission system to identify vegetation encroachment and risk trees. It works well for transmission due to the open linear transmission rights-of-way. LiDAR is primarily collected via helicopter and fixed wing aircraft.



Lightning Arrester: A piece of hardware that reduces voltage surges from direct or nearby lightning strikes. When a lightning strike occurs, the overhead conductor experiences higher than normal voltage levels. This high voltage is dissipated via the lightning arrester, mitigating potential damage to equipment.



Line Miles: The number of miles of transmission and/or distribution line. Differs from circuit miles because individual circuits, such as the two circuits of a double-circuit line, are not counted separately in circuit miles but are counted as separate in line miles.



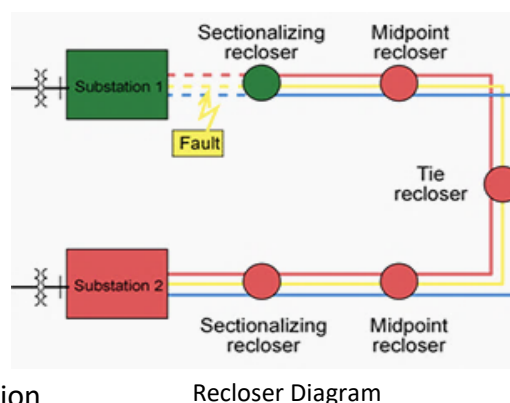
Live Fuel Moisture Content: Moisture content within living vegetation, which can retain water longer than dead fuel. Moisture content is a critical factor related to how much fuel is available to burn in a wildfire. When moisture content in living vegetation reaches a critical low threshold, fire danger increases.

Managed Risk: In Avista's Wildfire Plan, this is the future state wildfire risk level as it is impacted by the addition of Wildfire Mitigation elements like grid hardening.

LIVE FUEL MOISTURE CONTENT		
RANGES BETWEEN 30 AND 300%		
MOISTURE CONTENT	GRASSES	TREES/SHRUBS
150-300%	GROWING CYCLE	GROWING CYCLE
120-150%	RESIST SPREAD	RESIST SPREAD
100-120%	RESIST SPREAD	RESIST SPREAD
80-100%	BECOMING LESS RESISTANT TO SPREAD	FLAMMABLE SHRUBS BURN AGGRESSIVELY
50-80%	FUELS CONTRIBUTE TO SPREAD	CONTRIBUTES TO FIRE INTENSITY
30-50%	COMPLETELY CURED DEAD FUELS	DORMANT, LEAFLESS DEAD FUELS

Medical Baseline Customers: Residential customers with qualifying medical conditions and/or who are dependent on power for qualifying medical devices for certain medical needs.

Midline (Midpoint) Circuit Reclosers: Often used on long distribution lines where substation-based equipment cannot adequately protect the entire length of the circuit. Avista's Wildfire Plan adds communications to these midline circuit reclosers to provide monitoring and control functionality, including the ability to operate the device remotely. By placing automated midline circuit reclosers at strategic locations, Avista Distribution Operations can re-task devices during periods of elevated fire danger to operate in fire protection mode



Miles Completed: In the Avista Vegetation Management Plan, this is a calculated value that equates to the known overhead line mileage within a work polygon multiplied by the percentage of planned trimming, removing, replacing, and other vegetation management work completed within that polygon. Completion of planned work means performing such vegetation management to the Company's specifications.

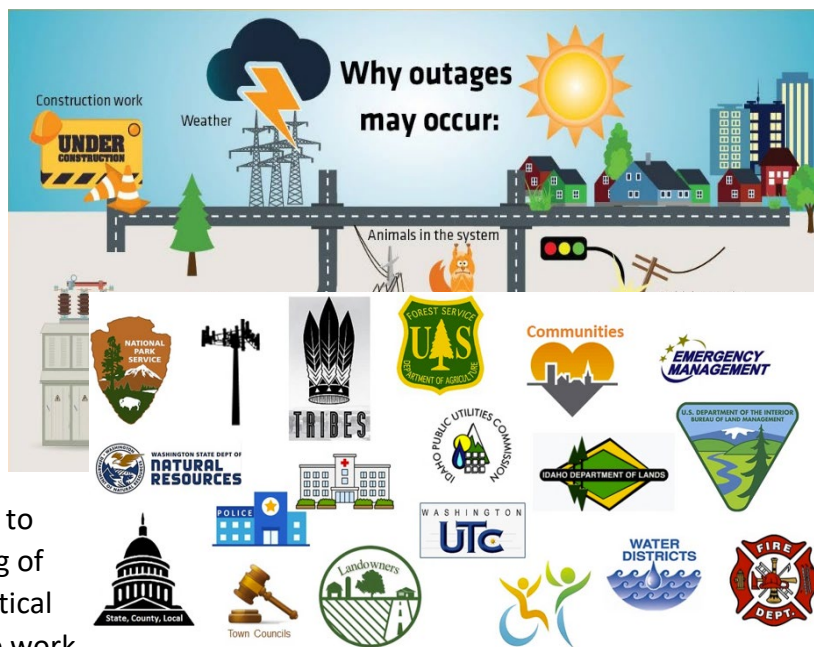
Miles Inspected: The number of miles of utility assets, equipment, or infrastructure examined to assess their condition, functionality, compliance with standards or regulations, including encroachment concerns from vegetation or other external sources. May be performed via foot.

Miles Planned: In Avista's Wildfire Mitigation Plan, this is the number of miles of risk tree inspections projected for completion.

Momentary Outage: The IEEE defines “momentary” outages as a brief loss of power (less than five minutes in length) caused by the opening and closing operation of an interrupting device.

Multi-Agency

Coordination/Partnerships: A generalized term which describes the functions and activities of representatives of involved agencies and/or jurisdictions who come together to make decisions regarding the prioritizing of incidents, and the sharing and use of critical resources. It also refers to agencies who work together, sometimes via financial assistance, in reducing fire risk.



Some of Avista's Wildfire Partners

Named Communities: According to Washington State, these are communities that are highly impacted by adverse socioeconomic conditions, pollution, and climate change, or who experience a disproportionate risk of environmental burdens. They are comprised of a combination of “Highly Impacted Communities” and “Vulnerable Populations” (each defined elsewhere in this report).

National Weather Service: An agency of the United States federal government tasked with providing weather forecasts, warnings of hazardous weather, and other weather-related products to organizations and the public for the purposes of protection, safety, and general information. Most of its products are in the public domain and available free of charge.

Open Wire Secondary Districts: Three conductors with 120/240 volts that run pole to pole below the primary conductors (primary conductors are on top of the pole in an overhead distribution system). Called “open wire” because the three wires are clearly visible as opposed to a design in which the three conductors are bundled together. Sometimes called “Secondary Main.”

Operations and Response: Many of Avista’s circuit breakers cannot be remotely operated and require manual intervention to make changes to settings or to identify an issue. This may take several hours depending on location and crew availability. Avista’s Wildfire Program funds communications and control equipment that will help us have “eyes” on critical equipment out in the field as well as be able to control and adjust equipment remotely in case of fire or high fire threat conditions. This area of the Plan also includes Fire Safety Mode operations, PSPS, Expedited Response, and partnership activities including cross-training.

NIFC/National Interagency Fire Center: Located in Boise, Idaho, this is the home to the National Interagency Coordination Center (NICC) and National Multi-Agency Coordination (NMAC) groups, which provide unified guidance to fire agencies, coordinate fire response, manage firefighting resources, and track and document fires, sources, size, and impact across the United States.

Patrol: In Avista's Wildfire Plan, this refers primarily to verify trouble where an inspection may have identified a concern or referring to the necessary work after a fault in elevated Fire Safety Mode or after a PSPS event. Patrols may be completed via ground, vehicle, or aerial.

Peak Fire Season: That period of the fire season during which fires are expected to ignite most readily, to burn with greater than average intensity, and to create damages at an unacceptable level.

Plan-Do-Check-Adjust: A continuous improvement technique also known as the Deming Circle or Shewhart Cycle. Avista's Wildfire program uses this technique to help continue to grow and improve the program.

Planned Outage: Electric outage announced ahead of time by the utility typically to perform maintenance or repairs or to build new infrastructure.



Pole Wraps: Avista uses Genics Fire Mesh, a wire mesh treated with an intumescent coating that, when exposed to extreme heat, rapidly expands to form a barrier between the fire and the wood pole. These wraps help prevent low-burning fires from accessing wood poles, protecting them from damage or destruction. At Avista, pole wraps are used in areas subject to routine grassland, sage-shrub, or other low level fires.



Polygons: Between 2017 and 2018 Avista's Vegetation Management planning was changed from circuit level to polygon level. Polygons contain many circuits.

Protection System: This comprises protective relays, associated communication systems, voltage and current sensing devices, station batteries, and DC control circuitry designed to protect equipment and facilities.

Protective Relays: These devices detect and attempt to identify and correct faults. They read measurements such as current, voltage, and frequency and can be set to recognize when these indicate a problem. For example, if a protective



Protective Relay

relay senses that a circuit breaker is interrupting the system, it can disconnect it.

Public Safety Power Shutoff

(PSPS): When an electric company preemptively turn off the power to specific areas of the system to reduce the risk of wildfires and to help keep customers and infrastructure safe. These events are based on a prediction of risk rather than the occurrence of an event.

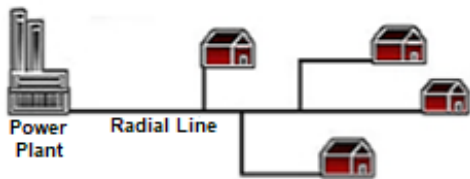


Public Safety Power Shutoff Deciding Factors

PSPS Event: Defined as the time from the when the first public safety partner is notified of a planned public safety de-energization to the final customer being re-energized.

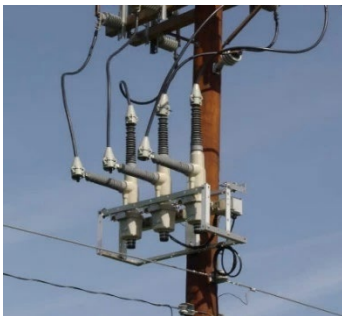
PSPS Weather: Weather that exceeds a utility's risk threshold and creates decisions around initiating a PSPS in specific areas of the system.

Radial: A transmission or distribution line that does not have a redundant feed – it is a single line



running from the generator to the customer, so if this line is lost, customers lose service, versus a redundant system that has another line or lines available to serve load if one line is lost (see Looped or Redundant). These are common for low density rural areas where more complex systems are cost prohibitive.

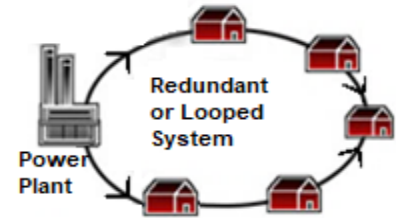
Recloser: A device that operates similarly to a circuit breaker but is installed on a distribution circuit. Reclosers are available for both single-phase and three-phase fault interruptions. The main purpose of a recloser is to sectionalize a portion of a circuit from the rest of the circuit to prevent outages from



spreading. A Viper recloser, which is often used at Avista, provides automatic overcurrent protection. It detects temporary faults (like a tree branch falling through a line) and automatically interrupts the power to isolate the fault, then tries to reclose the circuit to restore the flow of electricity. These reclosers also provide remote operation and control so they can be used to aid in Fire Safety Mode operations.

Red Flag Warning (RFW): Level of wildfire risk based on weather conditions, as declared by the National Weather Service.

Redundant: This is also called a “looped” system means that more than one line or route runs between the generation source and the end customer. If one line is lost, the power is rerouted via another line resulting in a shorter outage or no outage at all. This is a factor in determining whether or not to take a transmission line out of service.



Relative Humidity (RH): Relative humidity is expressed as a percent of the amount of moisture *in* the air to the amount of moisture needed to *saturate* the air. Humidity can either dampen or dry out potential fuel.

Reliability: Maintaining customer’s electric service continuity.

Restoration: When a threat has ended and it is safe to begin making repairs, crews are organized and dispatched to the site of a power outage.

Risk Based Vegetation Inspections: Risk tree inspections pursuant to our Risk Tree Program.

Risk Tree: A dead, declining, or found to be significantly structurally defective that could imminently fall into energized facilities.

Right-of-Way (ROW): A right-of-way is the right to come onto a property owned by another. For a utility, this allows us to do maintenance and/or tree trimming work on land that is not our own.

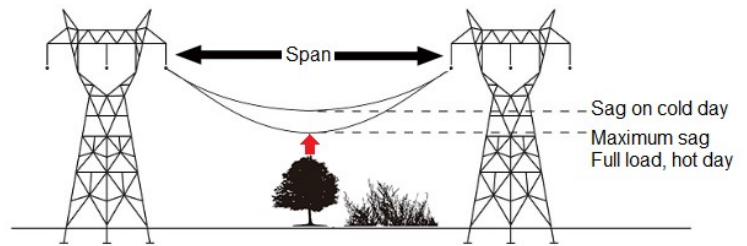


Avista transmission right-of-way restored with low-growing vegetation

Rural: Areas of our service territory with small populations, often having less access to services such as firefighting. This is typically an area with a population of less than 1,000 persons per square mile as determined by the U.S. Census.

Safe Tree Program: This is a partnership with private landowners to remove risk trees on their property to reduce the chances of their trees contacting powerlines and creating fire potential or loss of service. This program is offered to customers in high fire threat (typically WUI 2 or 3) areas who have trees likely to come into contact with our powerlines. At the customer’s request the tree is removed, the debris cleared, and a new low-growing tree is planted in the same place (if they wish to do so) at no cost to the customer.

Sag: For overhead transmission lines, sag is the difference between the point of support, being the transmission pole or tower, and the lowest point on the conductor.

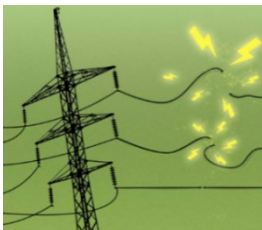
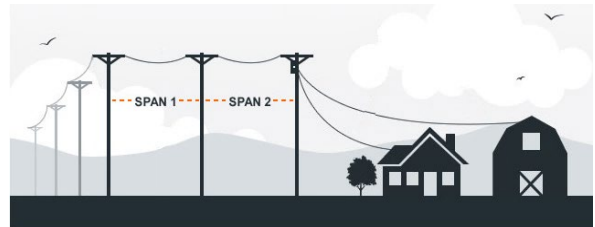


Severe Fire Danger Index (SFDI): This is a forecastable metric that can help forecast extreme fire conditions based on historical data related to fire intensity and spread potential. When this data is combined with current wildfires it helps predict fire intensity, potential resulting damage, and loss of life. This metric helps firefighters and communities by providing critical information to help improve early warnings and situational awareness. When we are entering Fire Safety Mode, Avista overlays this information over our service territory, and when it indicates any “extreme” levels we may declare Fire Safety Mode operations.

Situational Awareness: Tools and programs designed to identify and manage risk, primarily Avista’s Fire Weather Dashboard, WUI Map, weather stations, and wildfire cameras.

Social Impact Team: An internal Avista group that is tasked to work with community-based support agencies and nonprofit organizations that engage in customer care activities such as the Red Cross, Aging and Long Term Care of Eastern Washington, the Community Action Partnership, and the Spokane Tribe Energy Partnership.

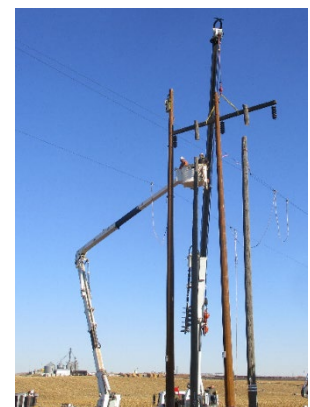
Span: The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment.



Spark Ignition Source: Something that creates a spark that may lead to a fire under certain circumstances, such as a failed piece of equipment, blown fuse, or conductor that touches dried vegetation on the ground.

Steel Conversion: One of Avista’s wildfire mitigation strategies is to replace wood transmission poles with steel primarily in high canopy areas that are at an elevated risk of fire as steel is less likely to be damaged and fail when exposed to fire or other damage risk.

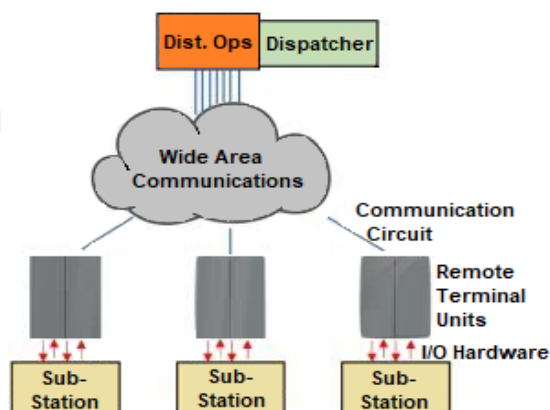
Strike Distance: A term used to describe the distance between a tree and where it may fall into powerlines or other equipment.



Wood to steel conversion on the Othello-Warden transmission line

Substation SCADA / Substation Fire Safety Mode

Automation: Provides automation that allows remote control and operation of substation equipment to allow it to respond more quickly if fire conditions indicate elevated risk. In Avista's Wildfire Plan, fifteen remote substations located in high fire risk areas will be upgraded with communications equipment and hardware/software that allows them to support fully automated Fire Safety Mode operations.



Sustained Outage: The IEEE defines a sustained outage as a disruption in power supply lasting more than five minutes. It is the de-energized condition of a line resulting from a fault or disturbance following an unsuccessful automatic reclosing sequence and/or unsuccessful manual reclosing procedure.

Switch: A disconnection point used to interrupt the flow of electricity. Switches can be mounted on overhead lines, on underground lines, and in substations. Switches mounted overhead and underground are used as a disconnection point as well as a sectionalizing device. During outages, the switch can be opened in order to sectionalize the faulted or damaged part of the circuit or reconfigure power paths to maintain service. Switches mounted in a substation can be used to isolate devices in a substation, such as a regulator, to protect them in case of fault.

Third-Party Contact: Contact between a piece of electrical equipment and another object, whether natural (tree branch) or manufactured (vehicle).

Tiers: In Avista's Wildland Urban Interface, the power system is divided into sections based upon the risk of a fire occurring and having impact. These are called Tiers and include: Tier 0 (Low or no risk), Tier 1 (Moderate), Tier 2 (Elevated), and Tier 3 (Extreme).

Transmission: Electric facilities that have a voltage of 60 kV or above.

Transmission Corridor: The right-of-way associated with a transmission line in which the utility has the right to remove vegetation that may interfere with the line.

Undergrounding: Undergrounding is the replacement of overhead distribution powerlines with underground cables. In Avista's current Grid Hardening efforts, select portions of distribution overhead line will be converted to underground facilities where feasible and cost justified.

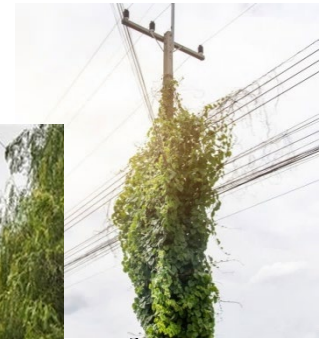


Avista Transmission corridor

Unplanned Outage: Electric outage that occurs unexpectedly with no advance notice from the utility.

Urban: Population centers such as cities and towns, typically having access to firefighting resources. Includes areas with a population of more than 1,000 persons per square mile as determined by the United States Bureau of the Census.

Vegetation Management, Risk-Based: Under Avista's Wildfire Plan, risk tree inspections are 100% of WUI Tier 2 and 3 polygons, as well as some additional rural tiers, and for transmission 100% of the grid are inspected each year for vegetation issues.



Vegetation Management, Routine: Trimming, removal, and other remediations of vegetation used to maintain utility right-of-way and reduce the risk of outages, ignitions, or other disruption and danger. At Avista, routine vegetation management is five-year cycle with 20% of the system completed each year.



Vegetation Risk Index: Risk index indicating the probability of vegetation-caused outages and/or the potential for ignitions along a particular circuit based on the vegetation species, density, height, growth rate, etc.

Vulnerable Populations: The State of Washington defines vulnerable populations as people who are unable to care for themselves, have a developmental disability, or are receiving healthcare services.²²

Wedge Connected Stirrups: The traditional hot line tap is attached via a bolt. Over time this type of connection can come loose, arc and spark, and melt through the conductor, dropping it to the ground. The wedge connected stirrup device prevents the hot tap from being directly connected to the conductor. The stirrup attaches in such a way that if the connection loosens or if the stirrup melts, the conductor is held in place and does not fall to the ground. A wedge connected stirrup is a more permanent connection to the powerline than a hot tap.



Wedge Connected
Stirrup

Wildfire Impact/Consequence: The effect or outcome of a wildfire, which may be expressed in terms including, although not limited to, health, safety, reliability, economic and/or environmental damage.

²² Washington State Dept. of Social & Health Services, "Vulnerable Adult," [Vulnerable Adult | DSHS \(wa.gov\)](https://www.dshs.wa.gov)

Wildfire Mitigation Plan:

Except when the context suggests otherwise, “Wildfire Mitigation Plan” means this Wildfire Mitigation Plan and any supplements or amendments thereto. Formerly referred to as “Wildfire Resiliency Plan”.

Wildfire Programs:

Activities, practices, and strategies that are only necessitated by wildfire

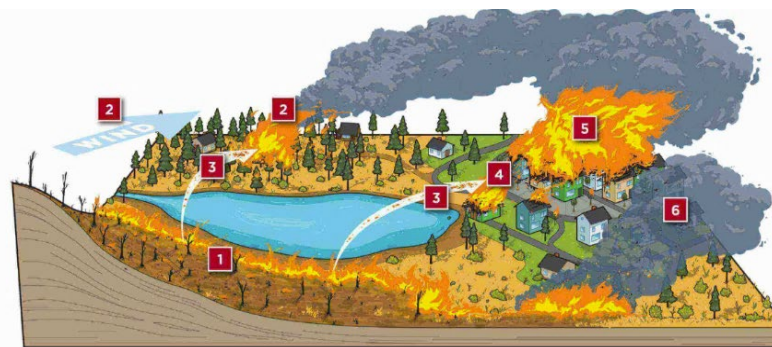
risk beyond that required by minimum reliability and/or safety requirements. Such programs are not indicated or in common use in areas where wildfire risk is minimal (e.g., territory with no vegetation or fuel) or under conditions where wildfires are unlikely to ignite or spread (e.g., when rain is falling).

Wildfire Risk Reduction: The average percentage difference between the current state of risk and future state risk levels as wildfire measures are implemented.

Wildland Urban Interface: Or “WUI”, is the zone of transition between wilderness (unoccupied land) and land developed by human activity; basically, where the natural environment (typically forested areas) meets the built environment.

Wire Down: Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or on a foreign object.

Wood Pole Wraps: See “Pole Wrap”



1 Wildfire Ignition

Wildfires can start through both natural and man-made events. Most wildfire ignitions are man-made, either directly (e.g., campfires) or indirectly (e.g., utility line spark). Because of this, wildfires often occur in proximity to humans – in towns and along road.

2 Fire Spread

Fire spreads by wind and through available fuels. If either goes away, the fire will usually stop spreading.

3 Source of Fire Damage

The damage caused by fires comes from **radiant heat** (flames), **embers** (burning chunks of fuel), and **smoke**. Fires send embers into the air, which travel downwind and may jump natural barriers, such as rivers and road. If they land on dry vegetation, they can start new fires. This process of spreading can be repeated over and over.

4 Ignition of Structures

Buildings can be ignited by flames or embers which land on the surface of a building or fly into vents and windows.

5 Urban Conflagration

If a wildfire reaches a neighborhood of closely spaced homes, fire can easily spread from house to house. If aided by wind, the entire neighborhood may quickly burn down.

6 Smoke Damage

Fires create large amounts of smoke which is then transported by the wind. If the concentration of smoke is high enough, it can result in insurance loss from evacuation orders (additional living expense), business closures (business interruption), and contents loss from contamination. Smoke can cause damage far beyond the fire perimeter during a wildfire event.

