



**TUCSON ELECTRIC POWER COMPANY and
UNS ELECTRIC, INC.**

2026 Wildfire Mitigation Plan

Version 3.0

Version	Date	Summary of Changes
2.0	April 1, 2025	Added Employee Safety section, Metrics section, and Appendix C. Updated maps in Appendix A.
3.0	March 2, 2026	Compliance with A.R.S. §§ 40-1301 through 40-1304 and § 37-1311 and Updates from 2025 Season.

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Preamble

UNS Energy Corporation and its operating companies, Tucson Electric Power Company (“TEP”) and UNS Electric, Inc. (“UNSE”) (collectively, “Company” or the “Companies”) are pleased to present this Wildfire Mitigation Plan (“WMP” or “Plan”) in response to the requirements of A.R.S. §§ 40-1301 through 40-1304 and § 37-1311. “Wildfire” is intended to be consistent with A.R.S. § 40-1301(4) as “any unwanted, unplanned or uncontrolled fire that ignites vegetation within a wildland or natural area, including: (a) forests, (b) grasslands, (c) prairies, and (d) any areas that interface between wildland or natural and urban areas.” The Plan has been developed with input from experts in the disciplines required to satisfy the requirement set out by the State of Arizona. Individuals responsible for developing and implementing this WMP include the Companies’ Vice President of Energy Delivery who oversees the safe, reliable, and resilient operations of the electric grid, and has leadership responsibility for this Plan. This position leads the Companies’ Wildfire Mitigation Plan Steering Committee and oversees the Wildfire Mitigation Plan Core Team who has day-to-day responsibility for implementing the initiatives contained within the Plan.

This Plan satisfies all requirements of requirements of A.R.S. § 37-1311(H)(2):

A.R.S § 37-1311(H)(2) Requirement	UNS Wildfire Mitigation Plan Location
A description of the areas within the geographic region where the utilities’ facilities may be subject to a heightened risk of wildfire	Section 3 Wildfire risk modeling was conducted by CloudFire, Inc. using the industry standard fire risk tier approach for long term planning of mitigation strategies, and a combination of Severe Fire Danger Index and Composite Risk Index for real time operations
A description of the procedures, standards and time frames that the utility will use to inspect and operate the electric utility's infrastructure to mitigate the risk of wildfires	Section 4.e Patrols and inspections are conducted based on the voltage level and risk level. High voltage lines are required to be inspected annually. Distribution assets are patrolled/inspected annually in high wildfire risk areas
A description of the procedures and standards that the utility will use to inspect and operate the electric utility's infrastructure to mitigate the risk of wildfires	Section 4.b Operations include wildfire safety training for field personnel; Incident Command training for grid operations personnel; and special protocols for safely working in the field using equipment that could cause a spark
A description of key individuals or position titles of those persons who are responsible for implementing the wildfire mitigation plan	Preamble Section The Vice President of Energy Delivery

<p>A description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildfires or provide a PSPS</p>	<p>Section 4.b and c There are two main courses of actions for de-energizing power lines 1) Emergency de-energization is a standard operating practice to de-energize power lines in response to an active fire, including at the request of public safety partners 2) Public Safety Power Shutoff – protocols to proactively de-energize the power grid based on fire weather conditions</p>
<p>A description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildfires or provide a PSPS</p>	<p>Section 4.b Procedures for disabling reclosers based on situational awareness in the field and from the CloudFire operations dashboard and Pyrecast Forecast tool</p>
<p>A description of the procedures, standards and time frames that the utility will use to carry out vegetation management</p>	<p>Section 3.d Vegetation Management</p>
<p>A summary of the procedures the electric utility intends to use to restore the electric utility's electric system in the event of a wildfire</p>	<p>Section 3.c UNS will patrol power lines that were de-energized either proactively (PSPS), or reactively due to fire weather conditions prior to re-energizing</p>
<p>A description of community outreach and public awareness efforts</p>	<p>Section 4.g UNS conducts public safety partner and community outreach in Tier 3 areas where PSPS protocols may be activated. Additional awareness tools include availability to news media, social media, website information and proactive mailings to customers</p>
<p>A description of potential participation, if applicable, with state or local wildfire protection efforts</p>	<p>Section 4.g UNS hosts collaboration sessions, participates in community wildfire preparedness programs and other collaboration sessions</p>
<p>A description of how the electric utility will monitor compliance with the wildfire mitigation plan</p>	<p>Section 5 The Wildfire Mitigation Plan is overseen by a Steering Committee of executive leadership representatives that oversees a Core Team of technical experts responsible for their aspects of the Plan</p>

1. Introduction

Throughout North America, and especially in the West, wildfires have become increasingly prevalent and catastrophic. The Companies are committed to reducing the risk of wildfires to the public in areas where their electric grid assets are located. TEP and UNSE are mitigating wildfire risks through a combination of operations, maintenance, system hardening, public safety preparation, and prevention programs. With a harmonized Wildfire Mitigation Plan Framework, shown in Figure 1, many aspects are taken into consideration to reduce risks that could cause or perpetuate a utility-related wildfire.

Figure 1. Wildfire Risk Mitigation Plan Framework



RISK BASED APPROACH – Focus on driving down the likelihood of ignition from an electrical facility that could spread and grow into a significant wildfire.

SITUATIONAL AWARENESS – Understanding wildfire prone conditions to inform mitigation measures including information about vegetative fuels and weather.

OPERATIONAL PRACTICES – Field and systems operations practices used to mitigate wildfire risk.

EMERGENCY RESPONSE – Under extreme wildfire weather conditions, emergency protocols, including incident command structure, protocols for de-energization of identified circuits or sections, when wildfire hazards are present.

VEGETATION MANAGEMENT – Vegetation management practices focused on clearances, distances, removal of hazardous trees, and ongoing activities to minimize the chances of vegetation striking lines.

CONDITION MANAGEMENT – Patrols and inspections frequency and type, based on wildfire risk with correction time frames to mitigate against utility caused wildfires. May include circuit performance analysis focused on wildfire prone areas.

SYSTEM HARDENING AND RUGGEDIZATION– Equipment that lowers ignition risk such as protective devices, structure replacements, and methods to prevent wildfires and maintain service continuity.

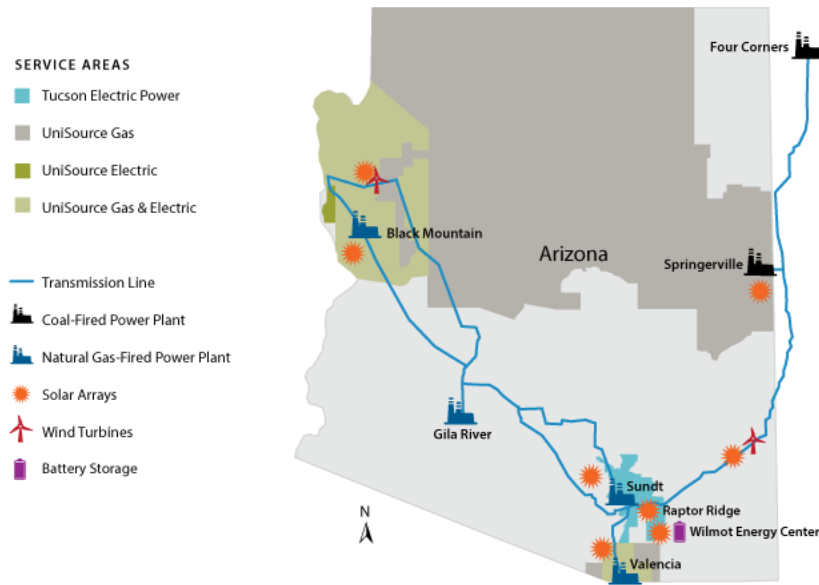
COMMUNICATIONS AND OUTREACH – Multi-pronged approach to communicating and collaborating with public safety partners, other critical infrastructure providers, and customers.

This Plan explores each aspect in more detail and outlines the Companies’ multi-faceted approach to building, maintaining, and operating the electric system to mitigate wildfire risk. Although TEP and UNSE operate in different regions in Arizona, the practices identified in this Plan are common to both Companies in most instances. However, unique aspects of the local electric system may require unique strategies in limited instances. This WMP details the Companies’ primary mitigation strategies and practices. It does not contain an exhaustive discussion of the Companies’ extensive day-to-day operational practices to ensure the delivery of safe and reliable power to our customers. This Plan will be reviewed and updated at least annually. By design, the approach described in this WMP includes collaboration with communities, industry experts, and public safety partners to focus Plan initiatives where they bring the greatest benefit.

2. Electric Systems Overview

UNS Energy is the Tucson, Arizona-based parent company of TEP and UniSource Energy Services, the parent company of UNSE. TEP serves more than 458,000 customers in and around Tucson, while UNSE provides electric service to about 105,000 customers in northern and southern Arizona. This WMP applies to all electric assets of TEP and UNSE and those jointly owned assets that these companies operate. A reference map is provided as Figure 2.

Figure 2. Utilities Service Areas Map



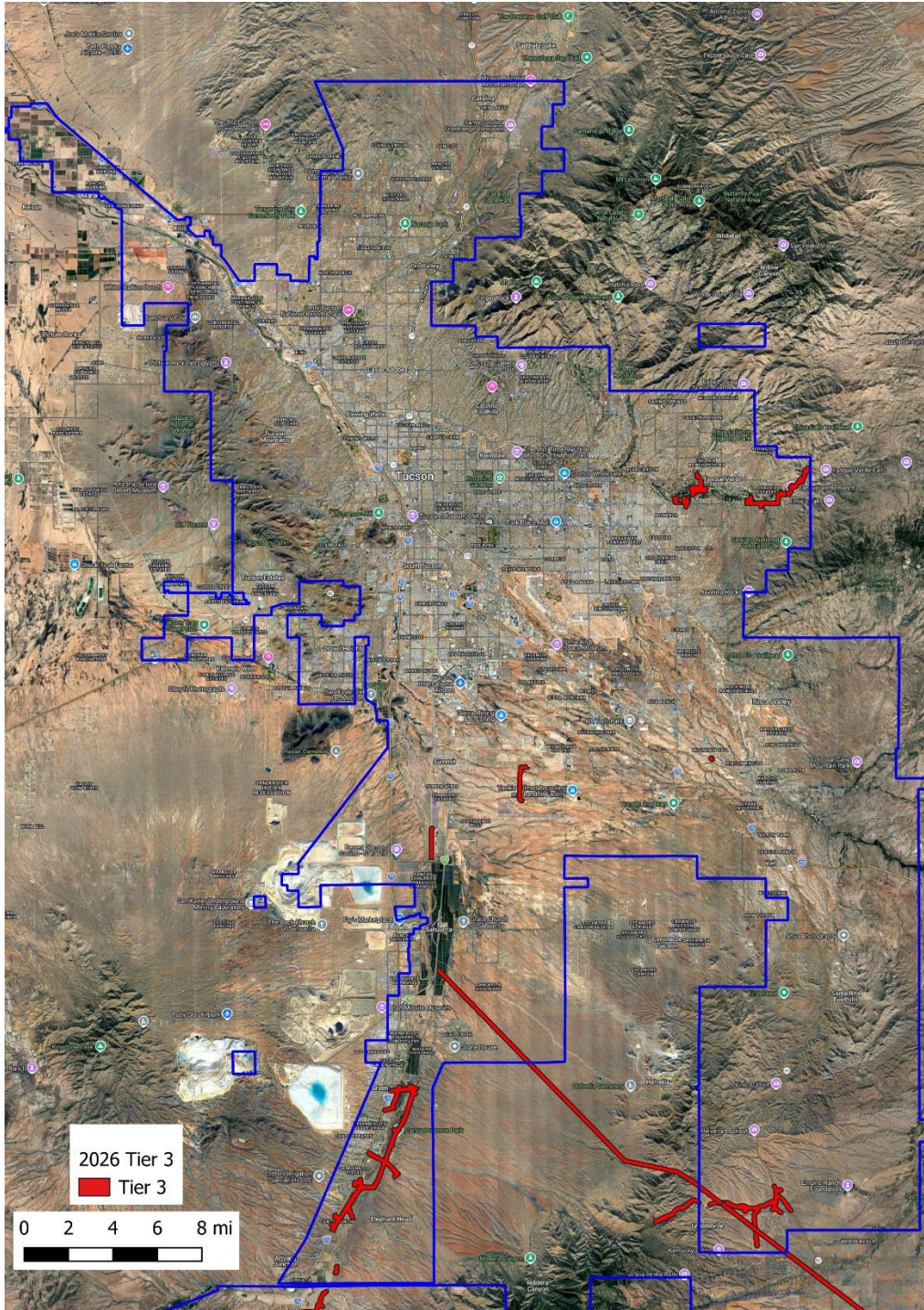
3. Wildfire Risk Assessment

Wildfire risk modeling is an industry practice that evaluates risk based on factors such as the presence of vegetation, structures, utility assets, historical outages, and historical wildfire information. The Companies have engaged CloudFire, Inc. to conduct wildfire risk modeling related to the Companies' assets and the geographic regions within which they exist. CloudFire conducted two types of modeling. The first is a Planning Model to identify wildfire risk Tiers that are used for longer term initiatives. This modeling includes more than 100 million computer-simulated fires modeled under historical conditions. The analysis uses advanced algorithms that take into account equipment outages, surface and canopy fuel layers from the United States Forest Service ("USFS") Landfire.gov information, 15 years of gridded climatology based on a 2.5 km resolution, topography from the United States Geological Survey and building footprints from Microsoft. Each modeled fire includes the number of impacted structures, acres of timber burned and fire suppression costs. The resulting risk scores are ranked and grouped into wildfire Tiers as shown in

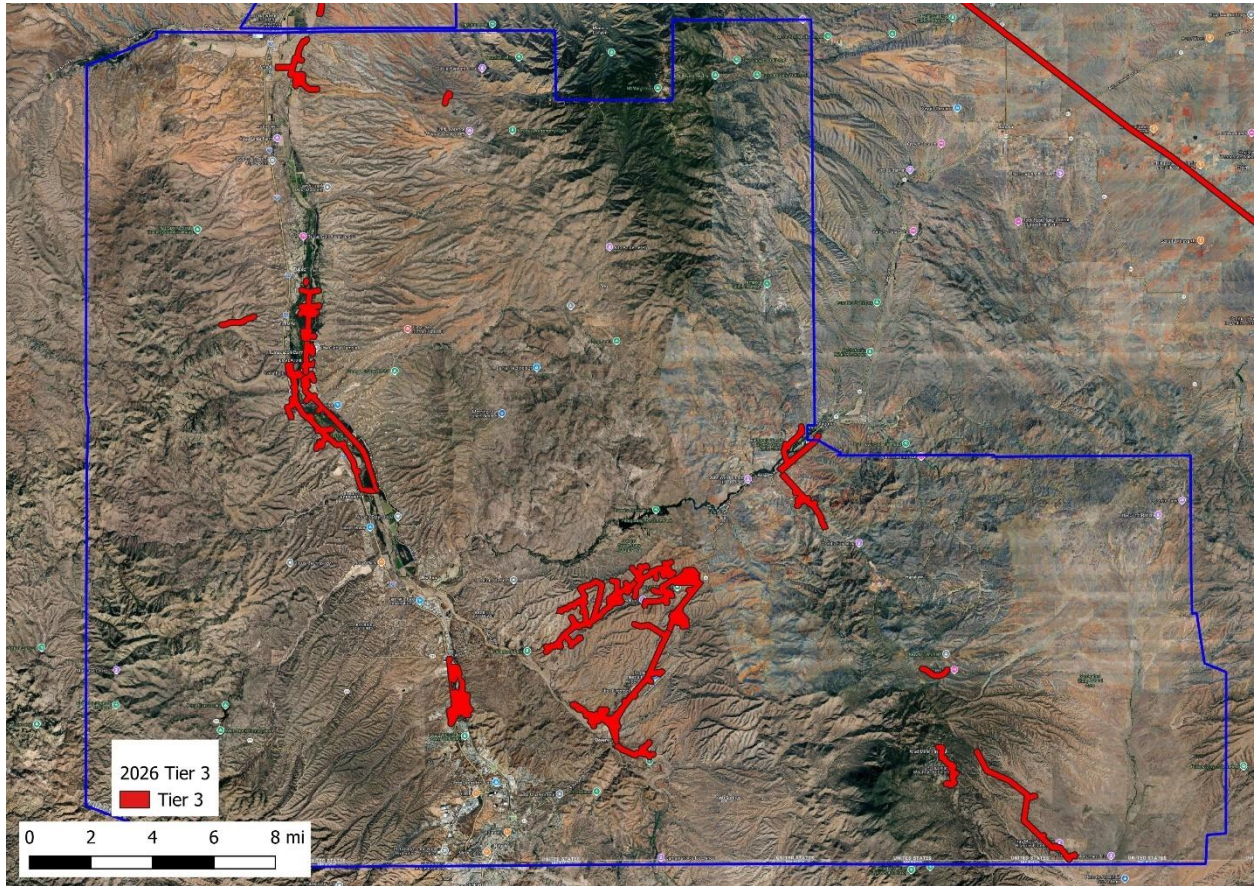
Figure 3. The Planning Model is used to prioritize wildfire mitigation initiatives.

Figure 3. CloudFire Tier 3 Wildfire Risk Maps

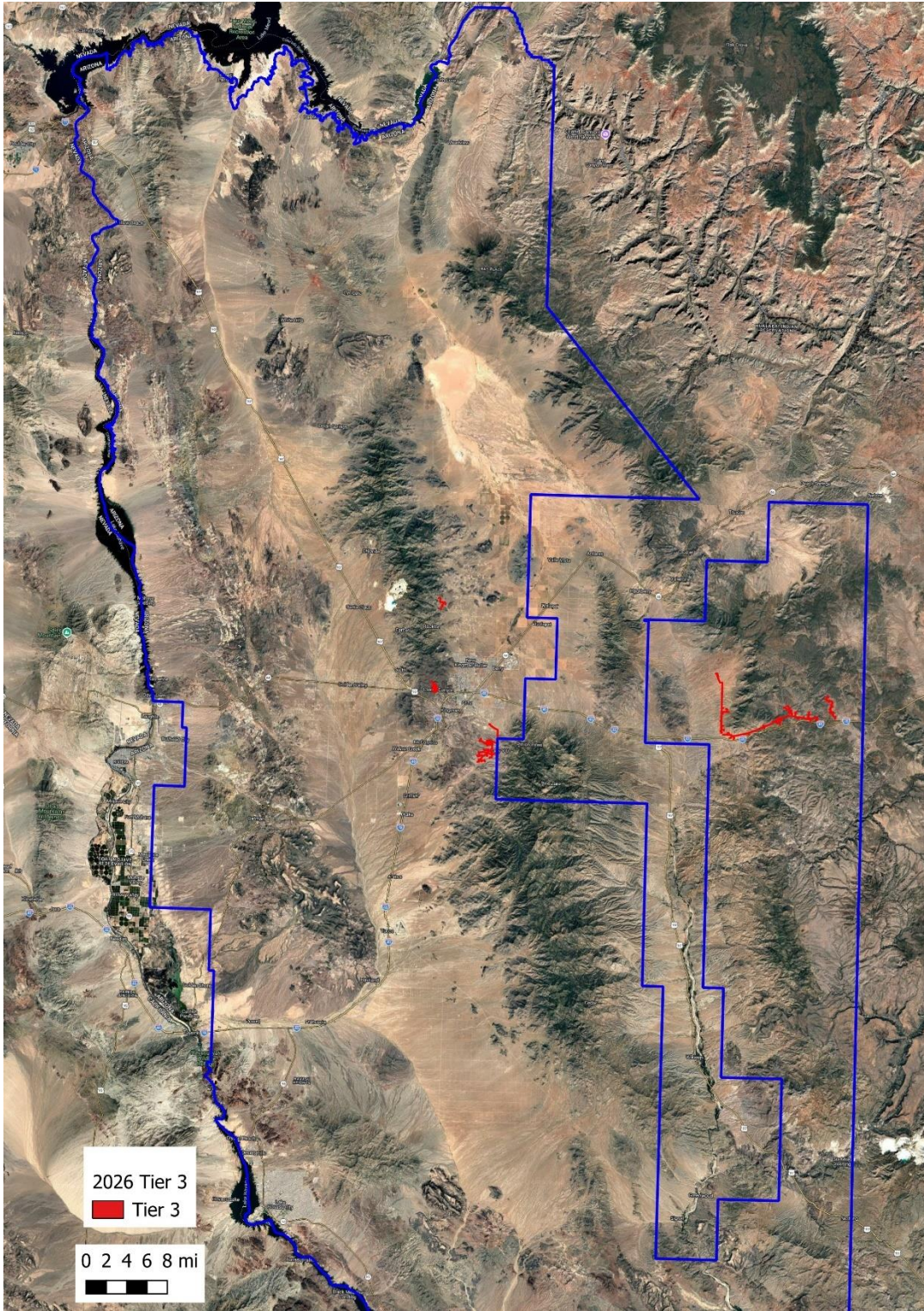
TEP



UNSE Santa Cruz



UNSE Mohave



Shorter term decisions are informed by CloudFire’s second type of modeling, an Operating Model. Operating decisions are informed by CloudFire risk indices and other publicly available data. These can include the Wildland Fire Assessment System to understand observed wildfire danger,¹ indices from the USFS, wildfire spread information from Pyrecastr;² and prevailing weather conditions such as wind gusts and lightning. Wildfires can occur at any time during the year, and the Companies are continuously monitoring for occurrence, however each year’s wildfire season is based upon the USFS declaration of Stage 1 or higher³ (“Wildfire Season”). Annual preparations for Wildfire Season, such as training and WMP review, are targeted to be completed on or before April 1st of each year. The Companies may adjust settings on equipment and increase reporting frequency for heightened awareness during Wildfire Season. Coordination with the Southwest Fire Coordinating Council⁴ further informs the Companies’ wildfire risk assessment process.

4. Wildfire Mitigation Practices

As with all utilities experiencing wildfire risks, the Companies employ a portfolio of activities for risk mitigation. These are encompassed in the WMP Framework. Through a portfolio approach, activities that take longer to implement, such as ruggedization, can be complemented with shorter term operational practices to reduce risk. Detailed descriptions of how practices are implemented, prioritized, and evaluated can be found within the practices, policies, and procedures of the Companies.

The Companies also seek insights from communities, customers, public safety and other partner agencies to leverage local knowledge. This ongoing outreach and engagement keeps the Plan relevant as part of the ongoing cycle of wildfire mitigation activities.

This section outlines the mitigation activities performed by the Companies to proactively reduce the risk of wildfires related to electric infrastructure.

a. Situational Awareness

Situational awareness provides insights into wildfire weather impacts and potential impacts to the electric grid. Situational awareness also helps to plan grid resilience improvements based on potential risk and to inform operating decisions. Information from equipment installed in the field can provide valuable information before, during and after wildfire events.

¹ https://gacc.nifc.gov/swcc/predictive/fuels_fire-danger/fuels_fire-danger.htm

² <https://pyrecastr.org>

³ <https://www.fs.usda.gov/detail/coconino/fire/?cid=fseprd891645>

⁴ <https://gacc.nifc.gov/swcc/predictive/intelligence/intelligence.htm>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>InciWeb– Web based interagency all-risk wildfire incident information management system.</p>	<p>This is the authoritative source of wildfire incident-related information that is used for tracking and reporting efforts. Key information includes wildfire location, standard incident name, wildfire size, percent containment, local point of contact and assigned resource.</p>
<p>Wildfire Threat Report – Notice distributed across the Companies to share wildfire hazard information.</p>	<p>This weekly report is sent out April through October to inform field personnel, employees, and contractors about the level of wildfire hazard, allowing them to modify their day-to-day operations to reduce the likelihood of ignitions during times of heightened conditions.</p>
<p>Active Fire Mapping – Geospatial display of active wildfire danger for the Companies’ assets and employees.</p>	<p>These maps supplement the Wildfire Threat Report tracking active wildfire mapping where assets are at risk. Provides information that can be used to prioritize operational adjustments considering wildfire risk and help guide emergency response plans.</p>
<p>Government Fire Tools – the USFS provides a variety of information to understand wildfire risk.</p>	<p>USFS FlamMap, US Department of the Interior LANDFIRE Program, State of Arizona wildfire risk assessment map (in EPRI link).</p>
<p>Fire Spread Mapping – Forecast modeling of potential wildfire spread.</p>	<p>Wildfire spread models, such as Pyrecast, can project the rate and direction of wildfire spread that could threaten assets and personnel.</p>
<p>Wildfire Web Map – Web application incorporating real time wildfire incident data, weather, wind forecast and the Companies’ electrical system assets and access.</p>	<p>This web application incorporates live data services from National Interagency Fire Center, National Weather Service to support analysis in the proximity of the Companies’ assets. This is used to monitor the progression of wildfires and help determine where preventive measures are required.</p>
<p>Outage Management System (OMS) – System used to provide the status of all lines across network at all times.</p>	<p>The system is one of the mechanisms through which the status of electric lines influenced by wildfire risk conditions (or other factors) is shared, supporting wildfire risk response across the Companies.</p>
<p>Gridware Gridscopes</p>	<p>Gridscopes are multi-sensor devices that are installed on utility poles to monitor physical,</p>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
Mechanical monitoring devices for improved awareness.	electrical, structural, and environmental conditions around each circuit span, providing continuous monitoring, even during outages.
Wildfire Detection Cameras	Wildfire detection cameras combine high-definition images and smoke detection for early detection of potential wildfires.
Wildfire Dashboard	Wildfire dashboards give an indication of potential wildfire risk related to overhead circuits identified in wildfire Tiers.

b. Operational Practices

Operational practices are those followed by the Companies to minimize or eliminate wildfire risk to electric infrastructure. These may include changing the mode of operation of equipment during periods of increased threat of wildfire. The Companies have seasonal safety operating protocols to follow during declared Wildfire Season.⁵

Field Operations: Safety training classes in wildfire safety and response are conducted for the Companies designated personnel. First responders receive training about utility infrastructure safety. The Companies’ field work practices manual is available on the Companies’ intranet. Annual refresher training is a key component of the Companies’ prudent operational practices. Collaboration with the Authority Having Jurisdiction (“AHJ”) may determine which practices are required in their respective area.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
Seasonal Work Planning – Shifting work within high-risk wildfire area outside of the Wildfire Season.	May reduce the potential ignition points during times of elevated risk.

⁵

<https://inside.uns.com/intranet/documents/498/20189/GI004%20Wildland%20Fire%20Notification%20and%20Communication.pdf>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Exercising of Reasonable Care – Follow standard operational protocols</p>	<p>Reduces the likelihood of utility caused wildfires.</p>
<p>Specialized Wildfire Season Safety Training – The Companies’ personnel and first responders share safety training for Wildfire Season mode.</p>	<p>Prepares personnel for safe work practices and wildfire awareness, reducing potential ignitions and wildfire spread.</p>
<p>Joint Utility Wildfire Safety Tabletop Exercise – Convene Arizona utilities to coordinate resources and practices for Wildfire Season.</p>	<p>Creates common understanding and joint protocols for wildfires that cross multiple utility service territories.</p>
<p>Wildland Fire Notification and Communication – Operating protocols to respond to active wildfires.</p>	<p>Supplements other procedures in reducing wildfire spread and improves interaction with other utilities and responders.</p>
<p>Wildfire Suppression Tools –Tools carried by the Companies’ personnel to mitigate wildfire spread.</p>	<p>The carrying of these tools ensures suppression activities can begin immediately after a fire is discovered.</p>
<p>No Reclose Operations - Disable automatic reclosing based on SFDI and other fire weather indicators</p>	<p>Based on the Severe Fire Danger Index (“SFDI”) and observed conditions in the field, distribution circuits in wildfire risk areas may be temporarily placed in no-reclose mode, meaning these circuits trip they will not be re-energized until a field patrol is complete. When fire weather conditions have subsided, the circuits will be returned to normal operation, where they may reclose automatically to re-energize after a fault condition to test the line.</p>
<p>System Control and Data Acquisition (“SCADA”) – Remotely control equipment settings.</p>	<p>SCADA capability reduces truck rolls and allows operators to change equipment settings remotely for added protection.</p>

c. Emergency Response

Under extreme fire weather conditions, using emergency protocols, including Incident Command or de-energization of identified circuits or sections, when wildfire hazard presents.

De-energization may occur reactively, in the presence of an active fire. This is a standard operating protocol to protect public safety and is usually conducted in collaboration with emergency responders and other public safety professionals.

Proactive de-energization, to de-energize when extreme fire weather conditions are present, but in advance of an active fire, has been included as an emergency measure.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Wildfire Risk Management Training – Training of staff in processes and communication of goals related to wildfire risk mitigation.</p>	<p>Ensuring all those operating in the field, across all activity types, are aware of their Companies’ wildfire risk mitigation goals and procedures that may reduce the potential ignitions and fire spread from these activities. Reduces risk to personnel responding to wildfire events.</p>
<p>Wildfire Joint Utility Collaboration – Collaboration across Arizona’s large utilities to harmonize practices and communications for coordinated wildfire risk mitigation.</p>	<p>Ensures a common awareness and understanding of practices being deployed in Arizona. Improves communication and coordination in advance of Wildfire Season challenges.</p>
<p>Tabletop Exercises – Preparedness activities and coordination with USFS/USFS Districts.</p>	<p>Highlights the Companies’ assets in highest wildfire risk areas and creates alignment for management of these assets during wildfire events. Establishes community connections for information sharing and response activities.</p>
<p>Proactive De-Energization – Public Safety Power Shutoff (PSPS).</p>	<p>De-energize certain circuits or circuit segments identified as being at-risk so the grid does not become a source of ignition or perpetuates a wildfire.</p>
<p>Incident Command System (“ICS”) – A national approach to emergency management.</p>	<p>Personnel involved with emergency response for wildfires related to electric utility infrastructure use the ICS of the Federal Emergency Management Agency. The Incident Commander (“IC”) is staffed by grid operations personnel with oversight from executive leadership.</p>

i. Proactive De-Energization

Under the proactive de-energization protocols, also called a Public Safety Power Shutoff or PSPS, portions of the grid may be de-energized when fire weather conditions materialize. The decision

to de-energize the grid without the presence of an active fire requires coordination and communication prior to taking action, as critical services could be impacted.

Decision criteria:

Decision criteria for implementing a proactive de-energization on circuits identified for wildfire risk depends on factors such as wind speed and direction, the presence of a Red Flag Warning, low humidity, the intensity of fire as indicated by flame length and energy release component. These factors appear either discretely or in a Composite Risk Index score from Cloudfire. The Companies use a backstop approach where only under the most severe drought and extreme wind conditions would PSPS be triggered. The notification windows are guidelines. Weather conditions may worsen quickly, which means the notifications may be issued in shorter windows as conditions warrant. Decision criteria are analyzed by the Incident Management Team (IMT) and notification are issued by the Public Information Officer under the direction of the IC. The IC acts under the direction of executive leadership.

Notifications:

Notifications to the Expert Working Group, that includes first responders, public safety partners, federal, state and local government agencies, and other utilities, are issued as far in advance as possible, ideally many days in advance. Structured customer communications are issued at specific stages. Should conditions subside, a PSPS may be cancelled any time prior to de-energization.

- Condition = Watch: The Watch stage is activated a day or two prior to a PSPS event, meaning there will be formal notifications to customers and the identified Expert Working Group members, including local emergency managers.
- Condition = Warning: The Warning stage is activated up to 24 hours in advance of a proactive de-energization. It is an indication that proactive de-energization is imminent.
- Condition = Underway: The Underway stage indicates that select circuits are being de-energized.
- Condition = Ended: The circuits have been visually inspected by patrolling the circuits. If anomalous conditions are identified, a detailed inspection will be conducted to determine any corrections. Identified corrections will be completed prior to re-energizing.

d. Vegetation Management

Vegetation management practices identify and correct vegetation-related problems on the electric system that could pose a wildfire risk. These practices focus on clearances, distances, removal of hazardous trees and ongoing activities to minimize the chances of vegetation striking lines. As risk modeling is completed, vegetation management practices may be adapted for

further risk reduction. The transmission system vegetation management programs meet the requirements of the National Electric Reliability Corporation requirements FAC-003-5.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Vegetation Inspections –Inspections conducted on a cycle basis used to plan vegetation management.</p>	<p>These inspections (via ground and/or aerial) provide a baseline that identifies areas where vegetation can be a potential threat to assets, supporting the development of planned mitigation, including removal, clearing, and trimming.</p>
<p>Utility Vegetation Management – To reduce the potential for grow in or fall in hazards. This includes but is not limited to trimming, removing, mulching and hazard tree prescriptions, primarily within rights-of-way.</p>	<p>May reduce the likelihood of threats to assets brought about through vegetation causes. Transmission vegetation management practices focus on removal of hazardous trees rather than trimming.</p>
<p>Enhanced Vegetation Management – Focusing vegetation management efforts on areas where vegetation poses an increased risk of impacting the reliability of a given power line.</p>	<p>Utilize inspection information to inform future vegetation management activities. Reduce the likelihood of threats to assets brought about through vegetation causes and create fire breaks.</p>
<p>Seasonal Work Planning – Shifting maintenance and vegetation work within high-risk wildfire area outside of the Wildfire Season.</p>	<p>May reduce the potential ignition points during times of elevated risk.</p>
<p>Regional Work Planning – Specific inspections related to regional weather patterns/anomalies in areas identified for wildfire risk.</p>	<p>May reduce the potential ignition points during times of elevated risk.</p>
<p>Vegetation Management Status</p>	<p>All Tier 3 are patrolled before fire season annually for all companies.</p> <p>Tier 2 and below are visually inspected every 3 years (DVI program) and planned maintenance performed every 5 years for TEP and UNSE Santa Cruz.</p>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
	Planned maintenance is performed every 5 years for UNSE Mohave.

e. Condition Management: Patrols, Inspections and Corrections

The Companies maintain procedures and inspection cycles. In areas of known wildfire risk, condition assessment may include circuit performance analysis to proactively identify concerns outside of scheduled inspection windows. Patrols are defined as visual inspections to detect obvious structural problems and hazards so that corrections or repairs can be scheduled. Detailed inspections are careful examinations of overhead equipment and structures that help to identify, triage and remediate hazardous findings either related to company assets or encroaching vegetation. Inspections establish a baseline for future wildfire resilience initiatives to routinely assess for corrective needs or potential upgrades. Corrective actions include maintenance, repair, or replacement for safe and proper functioning equipment. Wildfire risk modeling informs the frequency and nature of patrols and inspections and will continue to be refined.

The following table lists patrols, inspections and corrections practices to proactively reduce the risk of wildfire ignition. The application is specific to the location and attributes based on wildfire risk conditions.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Transmission Line Inspections (ground based) – Includes inspections in higher wildfire risk locations.</p>	<p>Proactive inspections on established 1- and 5-year cycle time frames for the entire transmission system, including greater frequency for higher wildfire risk areas, guide resulting maintenance or asset improvements to reduce risk. Various tools assist with ground inspections, such as Unmanned Aerial Vehicles drones, cameras, and binoculars.</p>
<p>Transmission Line Aerial Inspections (aerial based).</p>	<p>Proactive biannual aerial inspections focused on transmission line infrastructure and vegetation management for entire transmission system. Any observed risk during aerial inspection requires a ground-based inspection and follow-up.</p>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Circuit Performance Analysis – Identified potential risk that indicates supplemental inspections and corrections.</p>	<p>Uses a data-driven approach to identify potential field anomalies that could otherwise be the cause of a spark that could ignite a wildfire.</p>
<p>Distribution Visual Inspection (DVI) Program – Inspection of distribution equipment to look for realized or potential safety/reliability hazards and associated risks to system integrity.</p>	<p>Proactive inspections on established 3-year cycle time frame for entire distribution system to identify and remediate issues that may cause safety/reliability issues.</p>
<p>Priority Circuit Inspections and Maintenance – Remediates issues for priority circuits identified through reliability analysis.</p>	<p>System Ordered Circuit Patrols and Critical Circuit Patrols incorporated into DVI program to improve reliability in the distribution system.</p>
<p>Unmanned Aerial Vehicles or Drones</p>	<p>Uses imaging and analytics to identify overhead transmission asset and vegetation management issues.</p>
<p>Wood and Steel Pole Testing – Identifies poles that need to be replaced.</p>	<p>Testing tools, methods, and program to gauge asset health of wood and steel poles in Transmission & Distribution system.</p>
<p>Anchor Inspection Program – Identifies transmission structure anchors that need to be replaced.</p>	<p>Testing tools, methods, and programs to gauge asset health of transmission structure anchors. Specific application of this program is directed toward wildfire prone areas and evacuation routes.</p>
<p>Inspections</p>	<p>All Tier 3 circuits are inspected before wildfire season, typically April 1st</p>

f. System Hardening and Ruggedization

System hardening relates to infrastructure enhancements that reduce the chance that the Companies’ electric system will be the cause of a wildfire. Making the system more resilient to wildfires through system hardening investments can be targeted based on greatest impact, risk level and historical events. The CloudFire planning model is one of the key inputs to deploy ruggedized equipment. The Engineering Department, in conjunction with the Transmission and Distribution operating departments, investigates and determines fire resilient standards in areas identified for heightened wildfire risk.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Codes and Standards – Power line system is designed to NESC and IEEE standards.</p>	<p>NESC and IEEE set the basic standards that are required for power line design. These standards identify the need to design the grid to withstand climate related risks which in turn improves resiliency and reduces wildfire ignition risk.</p>
<p>Distribution and Transmission Steel Pole Standards – Utilize steel poles as the preferred standard pole replacement.</p>	<p>Steel poles are more fire resistant than wood poles reducing wildfire failure risk.</p>
<p>System Upgrade – Upgrade the distribution and transmission systems by upgrading to current standards during capital projects.</p>	<p>Use of current standards in the electrical system on capital projects in System Reinforcement, System Integrity, New Business and Public Improvement projects.</p>
<p>Fiberglass Crossarms – Use of non-combustible materials such as fiberglass crossarms.</p>	<p>The use of non-combustible materials may reduce the impact to utility infrastructure from an ignition source or a wildfire event as a standard on our steel poles and as a choice option on wood poles.</p>
<p>Transmission Anchor Replacement – The testing and replacement of anchors supporting transmission assets.</p>	<p>Reduces the likelihood of transmission structure failure, lowering potential fire ignitions.</p>
<p>Pole Replacement Program – Replaces wooden poles that have lost structural integrity or pass an age threshold.</p>	<p>The proactive replacement of wood poles may reduce the potential for failures that could act as ignition sources.</p>
<p>Grounding and Bonding – Improve grounding and bonding.</p>	<p>Improved grounding and bonding of pole hardware may contribute to preventing pole fires.</p>
<p>Avian Protection Equipment – Insulated materials that prevent bird or animal contact.</p>	<p>Minimizing wildlife interaction with live electrical components may reduce potential ignition events.</p>
<p>Application of Pole Treatments - Proactive application of flame-retardant paint on poles in areas at risk of wildfire.</p>	<p>Applying flame retardant paint to poles may reduce the risk of the structure being damaged.</p>

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p style="text-align: center;">Hardened Equipment Installation</p>	<p>Hardening circuits to prevent utility wildfire ignition is accomplished by replacing standard circuit protection devices with non-expulsion devices. Traditional expulsion fuses use arc energy to melt a fuse element during a line disturbance. This can result in expelling hot gases, sparks, and sometimes molten metal. Non-expulsion fuses interrupt faults internally and produce no external flame, sparks, or debris. TEP/UNSE is replacing traditional fuses in high wildfire risk areas with these devices. In some cases, single phase non-expulsion reclosers are being used called Tripsavers for long laterals.</p> <p>For three phase lines, “Intellirupters” are being used to replace traditional three-phase mechanical reclosers. These reclosers use solid state sensing and microprocessor controls to make precise decisions. Intellirupters test for faults before re-energizing a circuit. This prevents reclosing into a fault, thereby reducing the chance of an ignition by feeding into a fault. Intellirupters are also non-expulsion devices.</p>

g. Communications and Outreach

The Companies employ a multi-pronged approach to communicating and collaborating with public safety partners, other critical infrastructure providers and customers. Communications campaigns are often multi-layered ranging from broad awareness to targeted communications for communities and customers.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
<p>Awareness Campaigns – Targeted outreach to wildfire prone communities.</p>	<p>Supports the development of fire-wise communities to help reduce risk. Sets expectations for utility safety practices. Helpful to complete in advance of Wildfire Season and in collaboration with public safety partners.</p>
<p>Public Safety Partners – Establish a process to exchange information and updates about the WMP and wildfire mitigation activities.</p>	<p>Creates essential partnerships to coordinate resources, prioritize WMP initiatives and support wildfire resilient practices.</p>
<p>Wildfire Web Page – Provides information and Frequently Asked Questions about wildfire mitigation activities.</p>	<p>Informs communities and customers about the Companies’ practices. https://www.tep.com/wildfire-safety-prevention/ https://www.uesaz.com/wildfire-safety-prevention/</p>

h. Employee Safety

Wildland fires are unpredictable and may expose employees to a multitude of hazards. This section provides information for employees to be prepared in the case of wildland fire.

Access to active wildland fires will be managed by the Authority Having Jurisdiction (AHJ). Company employees will not actively engage in fire suppression unless employees are in immediate danger. Fire assessment and tactical decisions will be made by the designated Incident Commander. Company employees will utilize the Incident Command Structure to assist the Incident Commander for utility related risks and liaison activities.

Identified Company employees will be provided annual training on wildland fire risk identification, mitigation strategies, policies and use of Personal Protective Equipment (PPE). Employees performing planned work in high fire risk areas will complete the preplanning wildfire mitigation plan worksheet. The worksheet is designed to help employees identify risks and mitigation strategies prior to entering the wildland fire risk area.

Company employees working in areas identified with heightened risk will complete the wildfire mitigation plan worksite checklist prior to the start of work. This checklist supports the crew tailboard with identifying hazards related to wildland fires, ignition sources, and mitigation strategies.

Company employees entering a post wildland fire site must complete the wildfire mitigation plan post fire checklist. This checklist is designed to assist the crews with identifying post fire hazards

and mitigation strategies. It is a supplement to the crew tailboard when performing low frequency high risk work.

Mitigation Practices	How the Mitigation Practice Will Reduce Risk
Personal Protective Equipment -To provide the last line of defense for employee safety.	PPE shall consist of: <ul style="list-style-type: none"> • Fire Retardant (FR) Shirt • FR Pants • Neck Protector
Wildfire Equipment Tools – To provide additional resources to employees working in fire hazard locations.	Contents of Wildfire Equipment Tools <ul style="list-style-type: none"> • 4 five-gallon water containers • Water sprayer • Fire swatter • Rake • Shovel • Canvas Tarps
Wildfire safety work planning documents – To provide employees the tools to properly identify hazards and mitigation strategies when working in wildland fire risk locations.	Utilize the Wildfire safety pre- planning document, worksite checklist, and post fire checklist to identify potential hazards and apply mitigation strategies to reduce employee safety risk.
Annual Wildfire Safety Training -To ensure employees are trained on PPE equipment and identification of wildland fire threats.	Provide annual education on wildland fire risk identification, mitigation strategies, policies, and PPE deployment and use.

5. Monitoring Compliance with the Plan

The WMP is overseen by an executive-level Steering Committee that meets monthly. Part of the standing agenda is to review progress against Plan. The Core Team, comprised of experts across operating companies and technical disciplines, tracks progress monthly. A refresh of the risk tiers and risk reduction initiatives is conducted every two years using advanced wildfire risk modeling and an outside third-party expert in electric utility wildfire mitigation plans.

Appendix A. Table of Abbreviations

AHJ	Authority Having Jurisdiction
DVI	Distribution Visual Inspection
EPRI	Electric Power Research Institute
FAQ	Frequently Asked Questions
IEEE	Institute of Electrical and Electronics Engineers
NESC	National Electrical Safety Code
PSPS	Public Safety Power Shutoff
T&D	Transmission and Distribution
USFS	United States Forest Service
WMP	Wildfire Mitigation Plan