


HILL COUNTY ELECTRIC

— Serving 5 Counties in Montana with reliable power since 1945. —

WILDFIRE MITIGATION PLAN

DATE: July 2025
REVISION: WMP.2025.1

 Hill County Electric Cooperative, Inc. PO Box 2330 • Havre MT 59501 Phone: (406)394-7804 • Fax: (406)394-7801	Wildfire Mitigation Plan	Page:	Page 1 of 20
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1. Purpose

- a. To provide a comprehensive overview of the organizational and operational practices that the Cooperative implements to mitigate wildfire risk and to ensure the health, safety, and welfare of the membership by identifying potential risks within the system and prevention methods.

2. Objective

- a. The primary objective is to implement an actionable WMP to increase reliability and safety while minimizing the probability of Cooperative assets as the origin or contributing factor in a wildfire’s ignition. All strategies will comply with current NESC regulations and guidelines and state or county regulations.

The secondary objective for the WMP is to measure the effectiveness of specific mitigation strategies as they apply to the Cooperative. Where a particular action or protocol is determined to be unnecessary or ineffective, the Cooperative will evaluate whether modification or replacement is suitable. This approach will help determine if more cost-effective measures would produce the same or better results.

The WMP is a dynamic document, meant to evolve with time and is intended to be expanded during periodic reviews or as inputs change. Success rests on the ability to update the WMP as new information and regulations become available.

3. General Plan

- a. **Definitions/Terms/Acronyms**

ANSI	American National Standards Institute
BLM	Bureau of Land Management
BNSF	Burlington Northern Santa Fe
DNRC	Department of Natural Resources and Conservation
Ignition	The initiation of combustion
InciWeb	Incident Information System
IPAWS	Integrated Public Alert Warning System
MECA	Montana Electric Cooperative Association
NESC	National Electric Safety Code


DES	Department of Emergency Services
PSPS	Public Safety Power Shutoff
RFW	Red Flag Warning
ROW	Right-of-way or Rights-of-Way
VM	Vegetation Management
WECC	Western Electricity Coordinating Council
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan

b. Applicability

- i. All Cooperative employees
- ii. All Cooperative contractors
- iii. Cooperative employees should not consider any administrative policy as a contract of employment. The administrative policies shall not bind or obligate the Cooperative to provide these terms, conditions of employment, and/or benefits to employees in the future. Administrative policies may be modified, added to, or discontinued from time to time at the discretion of management. The Cooperative reserves the right to amend, modify or terminate, in whole or in part, any or all provisions of the administrative policies. This does not apply to those benefits addressed in the Collective Bargaining Agreement between Hill County Electric Cooperative and Local Union #44 IBEW.

c. Overview of Wildfire Preventive Strategies

The Cooperative has identified five preventive strategies designed to address wildfire. This WMP is comprised of the proposed wildfire prevention strategies that align with the Cooperative’s best practices, incorporates existing efforts, and identifies the process moving forward to supplement strategies where a need is identified. These combined components create a comprehensive WMP with a principal focus on stringent construction standards, fire prevention through system design, proactive operations, maintenance practices, specialized operating procedures, and staff training. This WMP integrates and interfaces with various operating procedures, asset management, and engineering principles that are subject to change.

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DESIGN AND CONSTRUCTION

- Increase overhead wire spacing to reduce wire to wire contact
- Pole loading and placement
- Pole replacement and reinforcement

INSPECTION AND MAINTENANCE

- Wood pole testing and inspections
- Vegetation ROW maintenance
- Line patrols and inspection of facilities and equipment
- Visual inspections of distribution substations
- Line patrols of overhead distribution and transmission facilities and equipment

OPERATIONAL PRACTICES

- Assessment of reclosing during Stage II & III fire restrictions when directed by land use agencies
- Follow County Fire Restrictions and Closures for Stage II and III fire restrictions
- Hot work procedures
- Work procedures for working in locations and conditions of elevated fire risks
- The Cooperative’s Emergency Response Plan
- Assessment and inspection of trees with potential strike path to powerlines turned in as a distribution inspection form.
- Vegetation Management including quality assurance and quality control
- Ensure compliance and proper vegetation clearance at time of maintenance
- Water tenders and 5-gallon wildland fire backpack pump

SITUATIONAL AND CONDITIONAL AWARENESS

- Tailboard briefings before fieldwork
- Monitor county fire restrictions
- Employee/Contractor education on fire ignition sources
- Monitor active fires
- Fire watch after work completed in high-risk areas during Stage II and III fire restrictions

RESPONSE AND RECOVERY

- Minimize public safety risk
- Emergency Response Plan
- Field operations recovery procedures

e. Risk Analysis and Risk Categories

The Cooperative evaluates exposure and risk of exposure to fire related hazards to better plan and manage them. The Cooperative applied its own field experience to determine the potential risk drivers. Identified drivers

associated with each category (see table below) are summarized but not limited to the following categories:

- i. **Contact from Foreign Objects.** Most of the Cooperative's overhead powerlines are installed as bare wire on top of insulated poles and structures. Overhead powerlines are kept at a certain distance from the ground and from adjacent objects, based on the voltage level and applicable design criteria, to prevent contact and faults. Contacts from objects do occur throughout the year.
 - 1) Animals, birds, and highly conductive mylar weather balloons are some of the objects that contact powerlines, causing sparks and arcs. While protection equipment such as circuit breakers, reclosers, and fuses are installed to isolate the faults, there are fractions of a second time delays associated with when the equipment senses the fault and proceeds to isolate (or "trip") the faulted section. The time delays are not fast enough to prevent all sparks prior to tripping. Emitted sparks, molten metal, or burnt foreign objects can fall on, and potentially ignite, any fuels near the powerline.
 - 2) Vegetation such as trees and branches from inside and outside the powerline ROW can contact powerlines, also causing sparks or arcs. From time to time, the contact can be large enough to cause a connector or pole to fail which may lead to wires falling and touching the ground. In some instances, the tree or branch may continue leaning on the powerline and continue sparking or catch on fire due to resulting sparks.
 - 3) Vehicles and Farm Implements contacting poles or supporting guy wires can damage or break the pole. The heavy, broken pole can put too much stress on connectors or crossarms and cause wires to break and fall to the ground, potentially emitting sparks and arcs.
- ii. **Equipment Failure.** All equipment is susceptible to failure. Failure modes can be discrete (internal) or destructive (materials ejected). Failure components such as hot line clamps, connectors and insulators can result in wire failure and cause the wire to contact other equipment or the ground. The energized conductors can emit sparks prior to the breaker or fuse tripping/isolating. Transformers and capacitor banks can have internal shorts with the potential to be destructive and eject materials that could be a source of ignition for fire.
 - 1) **Standard Fuses.** The utility industry may install expulsion fuses on the transformer and tap-lines to protect and isolate parts of the system that have experienced a faulted condition. Expulsion fuses utilize a tin or silver-link element in an arc-tube that vents gas and potentially molten metal to the atmosphere to extinguish an arc

created by a faulted condition. Molten metal can be a source of ignition for fire.


- iii. **Wire to Wire Contact/Contamination.** When energized conductors contact each other, it can cause sparks and may cause material to be ejected. This can occur when there is any type of shaking of the pole or high winds causing the powerlines to sway and touch. A moving pole can be caused by vehicle or farm implement contact, or livestock rubbing against a pole or supporting guy wires. Certain types of faults down the line can cause powerline gallop. Contamination on insulators can create a path for electricity to flow. This unintended path can track and cause a fault. These causes can usually be determined by burn marks along the insulator.

RISK CATEGORY	MITIGATION STRATEGY
Contact from Foreign Objects	Wildlife guards MECA – Avian Protection Plan Insulating equipment ROW VM and fuels reduction Line patrols and inspections Sectionalizing devices Increased inter-phase line spacing Lightning arrestors

RISK CATEGORY	MITIGATION STRATEGY
Equipment Failure	Routine maintenance Focused design and construction standards to reduce ignition sources Line inspections Pole testing Infrared inspections of substation Pole replacement practices Replacement at risk devices and update construction standards
Wire to Wire Contact/Contamination	Increased inter-phase line spacing Re-sagging of lines or inserting carry-poles Undergrounding of distribution lines where practical

f. Identified Higher Risk Areas

- i. The WHP map is a raster geospatial product produced by the USFS Fire Modeling Institute that can help to inform evaluations of wildfire risk or prioritization of fuels management needs across very large landscapes (millions of acres). The specific objective of the WHP map is to depict the relative potential for wildfire that would be difficult for suppression resources to contain. The WHP data looks at the wildfire

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likelihood, the wildfire consequence, and the population to derive the hazard data. It is one of several factors that can be used to prioritize VM.

g. Key Risk Impacts

- i. The list below outlines some of the worst-case scenarios and consequences:
 - 1) Personal injuries or fatalities to the public, employees, and contractors
 - 2) Damage to public and/or private property (structures, equipment, livestock, etc.)
 - 3) Damage and loss of Cooperative owned infrastructures and assets
 - 4) Impacts on reliability and operations
 - 5) Damage claims and litigation costs, as well as fines from governing bodies
 - 6) Damage to the Cooperative’s reputation and loss of public confidence

h. Preventive and Mitigation Strategies


- i. Public Safety Power Shutoffs (PSPS) is used in electric utility mitigation strategies to help ensure public safety. A PSPS preemptively de-energizes powerlines during high-risk events such as Red Flag Warnings (RFWs). There are major negative impacts on fire response, water supply, public safety, and emergency communications should a fire occur while a portion or the entire Cooperative’s system is de-energized. The Cooperative believes that the risks of implementing a PSPS far outweigh the chances that the Cooperative’s electric system would cause a wildfire. The Cooperative is monitoring PSPS implementation by other Montana electric utilities and will refine strategies as needed on the evolving topic.

i. Situational Awareness

- i. During fire danger periods, we call the local counties every two weeks for updated fire restrictions. In cases of extreme heat, HCE Safety & Loss Coordinator contacts our counties on an as needed basis.

j. Fire Precautionary Period and Restriction

- i. Montana counties have potential for extended fire seasons, ranging from March through November. Most of the Cooperative service territory is in the State of Montana’s DNRC’s Northeastern Area/District with the remainder in the Central Area/District. The Cooperative’s service territory falls within five counties: Blaine, Hill, Chouteau, Fergus and Liberty. None of the Cooperative’s service territory falls within National Forests lands. Each protection district and county will declare fire season separately and the Cooperative will monitor the County restrictions and plan operations accordingly.

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Current restrictions listed by each stage.

1) Stage I Prohibitions


- a. Building, maintaining, attending, or using a fire or campfire except within a developed recreation site, or improved site.
- b. Smoking, except within an enclosed vehicle or building, a developed recreation site or while stopped in an area at least three feet in diameter that is barren or cleared of all flammable materials.

2) Stage II Prohibitions: The following acts are prohibited in addition to the prohibitions of Stage I.


- a. Possessing, discharging, or using any kind of firework or other pyrotechnic device.
- b. Using an explosive.
- c. Operating a chainsaw or other equipment powered by an internal combustion engine between 1:00 p.m. to 1:00 a.m.
- d. Operating or using any internal or external combustion engine.
- e. Welding or operating an acetylene or other torch with open flame.
- f. Possess or use a motor vehicle off designated roads
- g. A patrol is required for one hour following cessation of all activities.

3) Stage II Exemptions

- a. Persons with a written permit that specifically authorizes the otherwise prohibited act.
- b. Persons using a device fueled solely by liquid petroleum or LPG fuels that can be turned on and off.
- c. Such devices can only be used in an area that is barren or cleared of all overhead and surrounding flammable materials within 3 feet of the device.
- d. Operating motorized vehicles on designated roads and trails.
- e. Emergency repair of public utilities and railroads as per described conditions including the following:
 - i. Emergency repair of electric transmission or distribution systems due to a power outage.
 - ii. Emergency removal of trees or limbs in or near electric power lines that create an immediate hazard to cause a direct impingement on the line or have the potential to start a fire.

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- f. Persons conducting activities in those designated areas where the activity is specifically authorized by written posted notice.
 - g. Any Federal, State, or local officer, or member of an organized rescue or firefighting force in the performance of an official duty.
 - h. All land within a city boundary is exempted.
- 4) Stage II On-site Measures Required for Exempted Activities
- a. One person with communications will be dedicated as a “fire watch” during exempted operations, and for two hours after all activity has ceased for the day.
 - b. When power outages occur, the affected line segment will be inspected before being re-energized. Motorized travel off established roads and trails is allowed during the inspection (to detect potential problems that could lead to a fire) of an electric or natural gas segment.
 - c. Vehicle requirements include the following:
 - i. One 5-gallon backpack pump.
 - ii. One serviceable firefighting tool, #0 or equivalent shovel or a Pulaski.
 - iii. One fire extinguisher with a minimum 2 ½ pounds capacity and 4 BC or higher rating.
 - iv. All internal combustion engines must be equipped with an approved spark arresting system and/or with an approved muffler and exhaust system.
 - v. No parking or driving over flammable vegetation.
- 5) Stage III Prohibitions
- a. Closure. When there are very high risks and the ability to manage those risks using Stage I or II restrictions is no longer viable. The social, economic, and political impacts of implementing a closure at this point are outweighed by the benefits associated with virtually eliminating the potential for human-caused fire starts.
- k. Recloser Operational Practices**
- i. There are approximately 382 reclosers on various distribution lines on the Cooperative’s electric system. The Cooperative does not typically disable automatic reclosing functions at its substations nor in the field due to weather-related conditions or high fire risk. However, the Cooperative continues to assess resetting reclosers to “one-shot”

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mode. The Cooperative will also support “one-shot” operations upon request by DES or land management agencies.

I. Infrastructure Inspection and Maintenance

ASSET CLASSIFICATION	INSPECTION TYPE	FREQUENCY GOALS
Overhead Facilities	Assessment	Regular observation conducted by multiple personnel
	Resistance Measurement Pole Test	10-year cycle
Underground Facilities	Assessment	As needed
Substations	Inspection	Monthly
ROW Vegetation Inspection	Inspection	Regular observation conducted by multiple personnel

m. Vegetation Management

- i. The effective management of vegetation in rights-of-way is an essential part of providing safe, reliable service to members. The Cooperative follows provisions regarding VM around overhead distribution lines contained in the NESC. All control methods used by Cooperative employees and contractors will follow accepted practices identified in the current ANSI Z133 Standards.

n. Fire Mitigation Construction

- i. See the_MECA - Avian Protection Plan and HCEC PTA drawings.
- ii. Insulated Equipment
 - 1) Insulated jumpers are used throughout the system as well as insulated secondary service wires.
- iii. Reclosers
 - 1) Reclosers, including trip savers, are utilized to interrupt fault current. The Cooperative maintains and test oil-filled reclosers on a scheduled interval.

o. Workforce Training

- i. The Cooperative has developed training coordinated by the Safety, Loss Control & Compliance Specialist Coordinator for its workforce to reduce the likelihood of an ignition. All Operations and field staff are:
 - 1) Notified of fire restrictions.
 - 2) Updated on restrictions and ignitions.
 - 3) Trained on the content of the WMP.
 - 4) Trained in proper use and storage of fire extinguishers.
 - 5) Trained in fire suppression tools, such as water tenders.
 - 6) Required, during tailboard briefings, to discuss the potential(s) for ignition, environmental conditions (current and forecasted weather that coincides with the duration of work for the day).

- 7) Required to identify the closest fire extinguisher and other fire abatement tools.
- 8) Required to report all ignition events to 911 and management for follow-up.
- 9) Encouraged to report deficiencies in the WMP to their Manager.

p. Preparedness and Response

- i. The Cooperative’s Emergency Response Plan
- ii. Public agency collaboration and member communications
- iii. DES communication and coordination


1) Emergency Services Contact List:

REGION	AGENCY	TELEPHONE
Blaine County	DES	O: 406-357-3260 or O: 406-357-3310
Chouteau County	DES	406-622-5451
Fergus County	DES	406-535-8118
Hill County	DES	O: 406-265-6511 or C: 406-400-2370
Liberty County	DES	406-759-5171
Blaine County	Sheriff’s Office	406-357-3260
Chouteau County	Sheriff’s Office	406-622-5451
Fergus County	Sheriff’s Office	406-535-3415
Hill County	Sheriff’s Office	406-265-2512
Liberty County	Sheriff’s Office	406-759-5171
All Counties	DNRC	406-444-2074

2) Coordination with Stakeholders

- a. Evacuation Levels. Defined by county.
- b. Work Crew Communications. Employees and contractors maintain reliable communications on job sites.
- c. Community Outreach. Information provided on prevention and mitigation on Cooperative website and social media.
- d. Emergency Preparedness and Response Stakeholders:

STAKEHOLDER GROUP	DESCRIPTION
Critical Agencies	Schools Public safety dispatch centers Local emergency planning committees Montana Department of Transportation Local hospitals DNRC BLM Local county road departments Montana disaster and emergency services

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Communications	Telecommunications companies Cooperative's communication platforms		
First Responders	Local law enforcement Local fire districts		
Utilities	Northwestern Energy Fergus Electric Cooperative Big Flat Electric Cooperative Marias River Electric Cooperative Local communication providers BNSF Railway communications		
Local Government	County Government: Blaine, Chouteau, Hill, Liberty, Fergus Chippewa Cree Tribe Fort Belknap Indian Reservation		
Safety Councils	DES		
Members	Any person, organization or critical facility receiving electricity from the Cooperative Key accounts		

q. Restoration of Service

- i. The Cooperative may elect to de-energize segments of its system by request from emergency responders. Inaccessible equipment or distribution lines will remain de-energized until accessible. The Cooperative sends out member and media notifications before de-energizing if possible and will strive to provide status updates when restoration efforts are underway and completed.
- ii. Cooperative crews take the following steps before restoring electrical service after a de-energization event. These measures are intended to protect workers, members, the public and the system's reliability.
 - 1) Before entry into a fire area, approval of the Incident Commander or the responsible agency administrator is required.
 - 2) Patrol: Crews will patrol every line when HCE is the cause of the de-energization of the lines to ensure no hazards have affected the system during the outage. Crews inspect lines and equipment for damage and/or foreign contacts and then estimate the equipment needed for repair and restoration. Lines located in remote and rugged terrain with limited access may require additional time for inspection. Cooperative personnel assist in clearing downed trees and limbs as needed. If HCE power supplier de-energizes the lines, HCE may not have time to patrol every line before energization occurs.

- 3) Isolate: Isolate area where repair is needed and restore power to areas not affected.
- 4) Repair: After the initial assessment, Cooperative managers, supervisors, and engineers meet to plan the needed work. Rebuilding commences as soon as the affected area(s) become safe. Repair plans prioritize substations and transmission facilities, then distribution circuits serving the most critical infrastructure needs. While the goal is to reenergize all areas as soon as possible, emergency services, medical facilities, and utilities receive first consideration when resources are limited. Additional crew and equipment are dispatched as necessary.
- 5) Restore: Periodic member updates of restoration status before full restoration are posted across available communication platforms. After repairs are made, power is restored to homes and businesses as quickly as possible. Members will receive notification of restored electric service.

4. Accountability, Responsibility, Metrics, and Monitoring

a. Plan Accountability

- i. The CEO directs management staff responsible for operations and or member service who determine when and how to notify outside agencies in cases of wildfire emergency events.
- ii. The EVP of Electric & Safety is responsible for the overall implementation of the WMP. Also responsible for monitoring and auditing the targets specified in the WMP to confirm that the objectives of the WMP are met. Staff will be directed as to their roles and responsibilities.
- iii. The CEO, EVP of Electric & Safety and EVP Customer Experience, are responsible for supervising communication with public safety, media outlets, public agencies, first responders, local DES, and health agencies by disseminating information to members and the public during emergency or planned maintenance outages.

b. Operating Unit Responsibility

The following table identifies the departments responsible for tracking and implementing the various components of the WMP.

MITIGATION ACTIVITIES	RESPONSIBLE DEPARTMENT OR TEAM
Risk Analysis	EVP of Electric & Safety
Wildfire Mitigation Strategy Procedures	
· Monitoring of line	· Substation inspections
· Wood pole resistance inspections	· Disable reclosers

VM	
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Fire Mitigation Construction
Electronic reclosers Pole replacement practices EVP of Electric & Safety MECA - Avian Protection Plan
Emergency Preparedness
Public and agency communications Community outreach CEO / EVP of Customer Experience Emergency Response Plan

- c. **Metrics**
 - i. The WMP is in the initial stage of implementation and data is relatively limited. The success of the WMP will require the Cooperative monitor and identify successful operations that are eliminating the Cooperative asset sourced ignitions as well as areas of its operations that will require a different approach. As the document matures and information is analyzed in following years, refinements may need to be made to the WMP.
- d. **Monitoring**
 - i. The CEO and EVP of Electric & Safety monitor the WMP and report its effectiveness to the Board on an as needed basis. Annually, appropriate utility staff will engender collaborative discussion and make changes to approved strategies, if needed. The WMP annual review aligns with the Cooperative’s existing business planning process and includes a yearly assessment of the WMP processes and performance.
- e. **Supporting Documentation**
 - ii. The Emergency Response Plan documents individual tasks necessary to sustain critical operations and should be used to ensure necessary functions are performed in the event of high absentee rates.
- f. **External Reporting**
 - i. Each appropriate workgroup will keep all Cooperative contractors informed of the WMP and all updates as they occur.
- g. **Document Retention**
 - i. Departments will retain wildfire mitigation plan.
 - ii. The Safety, Loss Control & Compliance Specialist Coordinator/HR will retain all workforce training documents.

5. Wildfire Mitigation Plan Revision History

Effective Date	Version #	Revised By	Revision History
12/31/2025	1.0		Approved

Exhibit WMP-1

WILDFIRE MITIGATION PLAN –<u>Acknowledgement</u>	
CEO	Date
EVP of Electric & Safety	Date
EVP Customer Experience	Date