



AVISTA WILDFIRE PUBLIC SAFETY POWER SHUTOFF PLAN

July 2024
Version: 1.0

Statement from Avista Executive Management

2024 represents Avista's 1st year of implementing the Public Safety Power Shutoff Plan. This Plan adds to the work being done to minimize risk of wildfire in Avista's 2023 Wildfire Resiliency Plan. The framework for operationalizing a PSPS Plan at Avista is firmly rooted in our 135-year operating history and represents the collective knowledge of Avista employees and fire agency professionals together with assistance from peer utilities, and most importantly, engagement with customers. It also reflects our commitment to partner with customers, communities, and those who manage forest landscapes and fight fires.

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



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

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

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Appendix A: Notification Plan

1. INTRODUCTION

In the Northwest, the number, size, and severity of wildfires has increased in recent years. This trend is expected to continue as temperatures rise and drought persists.¹ Avista published its first Wildfire Resiliency Plan in June of 2020 (the 2020 Plan). That plan introduced the risks, costs, and benefits of implementing a holistic set of measures to reduce utility wildfire risk. The 2020 Plan built upon Avista's operating history responding to and mitigating for wildfire activity in addition to adopting other risk mitigation strategies employed by peer utilities. Avista updated its Wildfire Resiliency Plan in 2023 (the 2023 Plan); the 2023 Plan details the performance and investments made from 2020 through 2023 and serves to reaffirm Avista's commitment to reducing fire risk to communities, customers, and the Company. Similar to other utility wildfire plans, Avista is making investments in four key areas:

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

Enhanced Vegetation Management – to inspect 100% of distribution line assets within wildfire risk tiers 2 and 3 annually and combine remote sensing technologies such as LiDAR and satellite imagery to aid in risk tree management.

Situational Awareness – to automate Avista's non-reclosing protection strategy, identify dynamic short term fire related risk and align with system protection levels.

Emergency Response & Operation – to help customers and communities be better prepared for wildfires and partner with emergency first responders before, during, and after fire events.

As part of its operational mitigation strategies, Avista has developed this Public Safety Power Shutoff Plan (PSPS Plan or Plan) to guide the assessment and decision making process when determining to proactively de-energize electrical facilities in identified areas of extreme wildfire risk when conditions are so severe it is deemed unsafe to operate our electrical facilities. This effort reduces the potential of those electrical facilities becoming a wildfire ignition source or creating safety concerns for not only our customers and communities but Avista staff as well. This Plan identifies relevant considerations, decision process flow and implementation protocols before, during and after a PSPS event, subject to the recognition that each situation is unique and that actual considerations and/or actions will vary depending on the circumstances. In general, the Plan will be active during wildfire season (typically June-October), reviewed annually and updated as necessary prior to the start of the next wildfire season.

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

2. ACRONYMS

AAR – After Action Review
AE – Account Executive
COO—Chief Operations Officer
CRC – Community Resource Center
DNR – Department of Natural Resources
DOT – Department of Transportation
EM – Emergency Management
EOC – Emergency Operations Center
EOP – Emergency Operations Plan
ERT – Estimated Restoration Time
EWC – Executive Wildfire Committee
FRI – Fire Risk Index
FSM – Fire Safety Mode¹
FWW –Fire Weather Watch
GIS – Geographic Information System
ICS – Incident Command Structure
IPUC – Idaho Public Utility Commission
IVR – Interactive Voice Response
NWS – National Weather Service
OEM – Office of Emergency Management
PG&E – Pacific Gas & Electric
PSPS – Public Safety Power Shutoff
PUC – Public Utilities Commission
RBM – Regional Business Manager
RFW—National Weather Service issued Red Flag Warning
WRMAA – Western Region Mutual Assistance Agreement
WUTC – Washington Utility and Transportation Commission

¹ Formerly known as Dry Land Mode (DLM)

3. PUBLIC SAFETY POWER SHUTOFF OVERVIEW

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

Avista has always prioritized keeping our communities and customers safe and continues to prioritize safety by increasing the resiliency of Avista's transmission and distribution (T&D) facilities. As part of its operational mitigation practices, Avista developed this PSPS Plan to proactively de-energize electrical facilities in extreme weather conditions where it is deemed unsafe to operate. Based on the inherently disruptive nature of power outages, PSPS events must be carefully evaluated under this Plan to balance wildfire risk with potential PSPS impacts on Avista customers and the communities it serves. For Avista, a planned de-energization is a measure of last resort to reduce public safety risk.

4. PURPOSE & SCOPE

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

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

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

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

5. PSPS RISK-INFORMED DECISION MAKING

5.1. Wildfire Risk

Avista's 2019 Wildland Urban Interface (WUI) map combined data from the Wildfire Hazard Potential with the location of Avista electric lines in areas of low, medium, and high population. This analysis indicated that 3,240 miles of Avista's 7,725 mile distribution system were located in high fire threat districts (42% of the system).

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

The unpredictable nature of wildfire and weather patterns create significant challenges with forecasting PSPS events. Real-time evaluations and decision-making are therefore critical in making PSPS determinations and, depending on the associated wildfire risk, those determinations may result in proactive de-energization in areas not originally anticipated, or in decisions not to proactively de-energize a line depending on the circumstances.

5.1.1. PSPS Feeders & Circuits

In 2023, Avista developed a list of 25 distribution feeders with the highest likelihood of being included in a PSPS event (the Top 25 List); this list was developed using the existing Avista Fire Weather Dashboard, wildfire data, historic outage data and scenario planning. This Top 25 List was developed as part of Avista's risk-based approach to preparedness. The Top 25 List assists with the planning and preparedness process to support our customers in the event of a PSPS event; the list does not preclude Avista from initiating a PSPS on other feeders or circuits in its service territory. At this time, PSPS is only being considered for use on Avista's electric distribution system; use of PSPS on Avista's transmission system is not currently part of this PSPS plan. Avista's transmission system is part of the Bulk Electric System (BES) which requires strict operational standards for maintaining integrity of the grid. Additional analysis of the impacts of PSPS on Avista's transmission system and development of the process to implement a transmission PSPS are required before being incorporated into this Plan.

The maps below include those feeders where a PSPS event is most likely to occur:

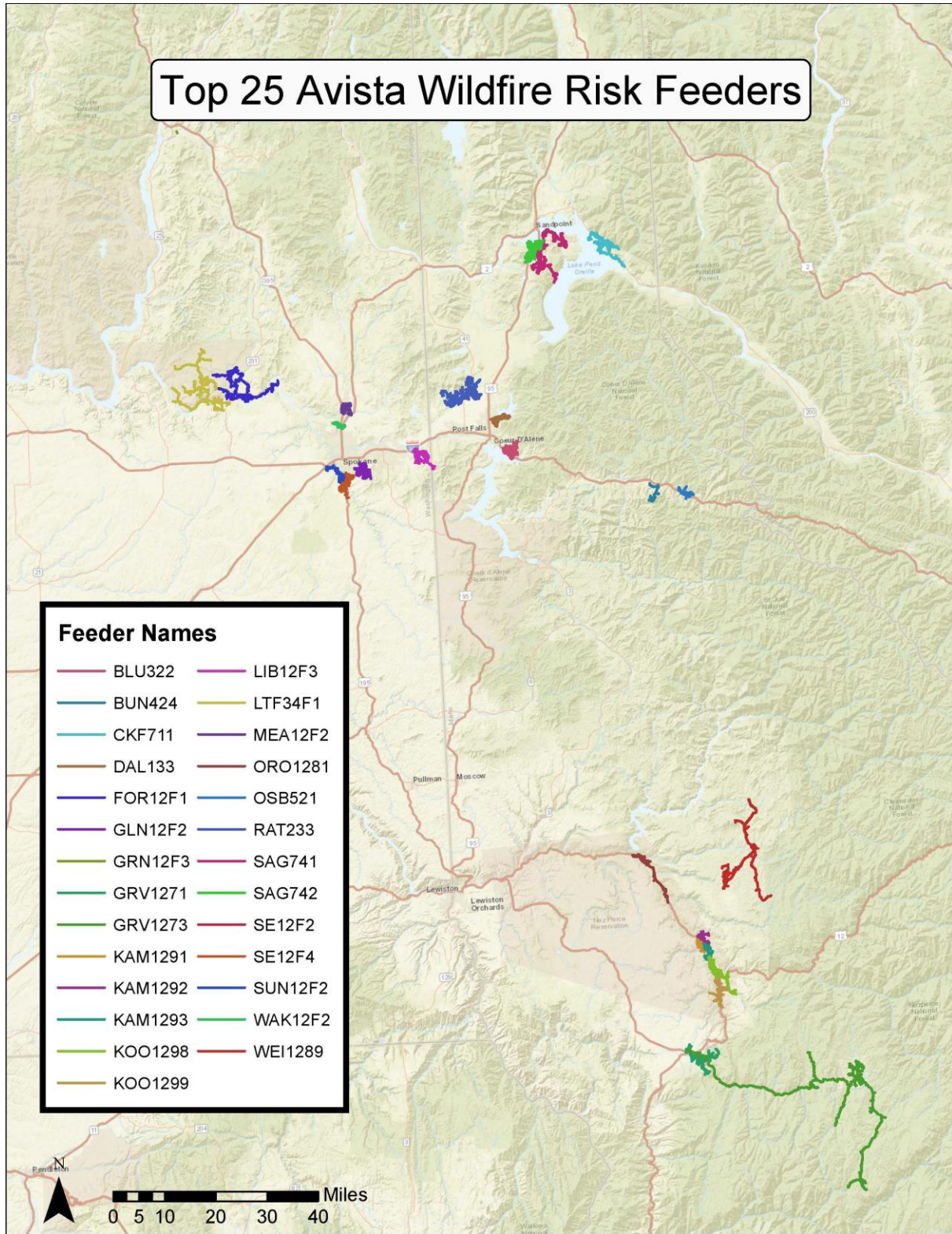


Figure 1
PSPS Top 25 Avista Wildfire Risk Feeders Map

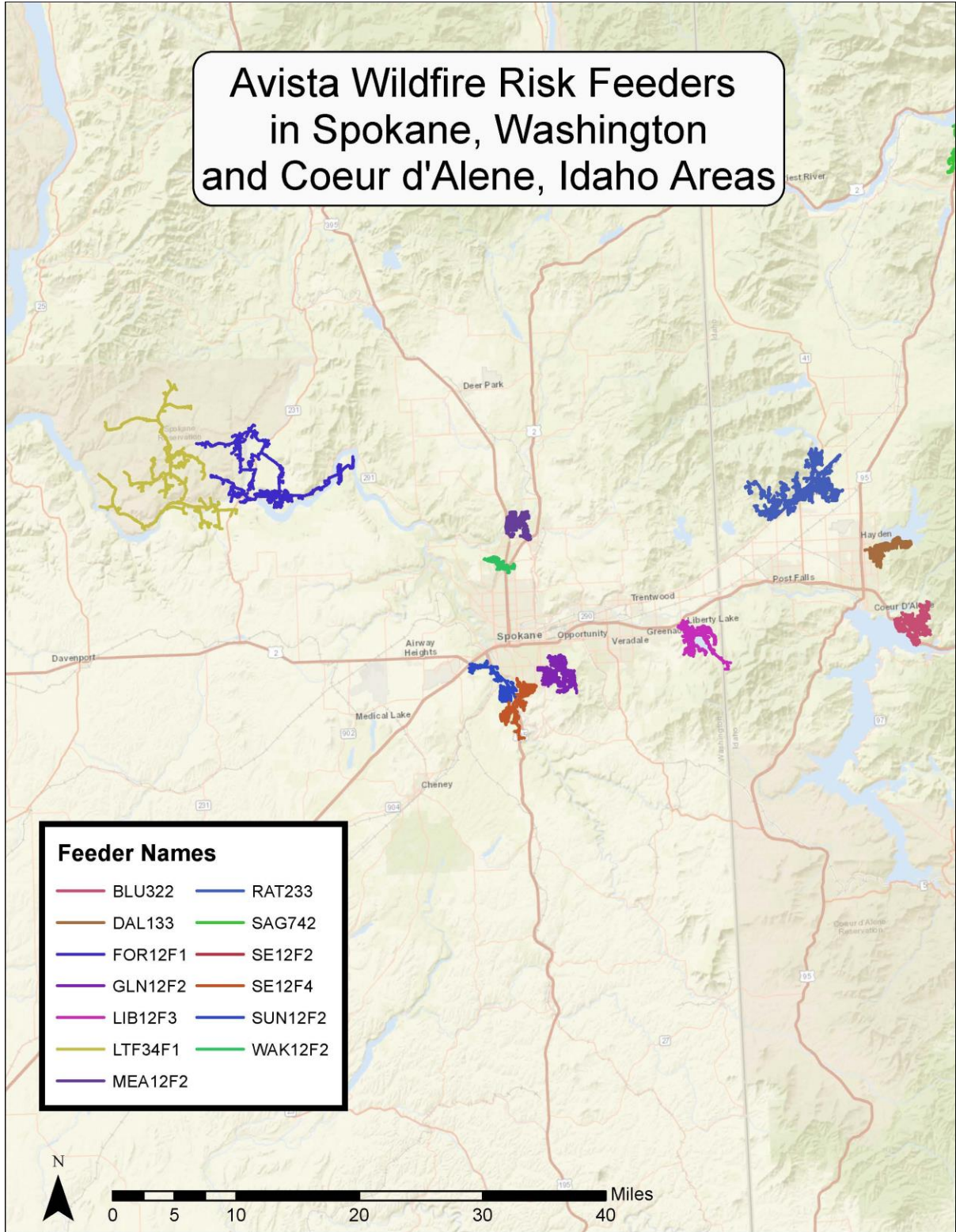


Figure 2
PSPS Spokane & Coeur d/Alene Risk Feeders Map

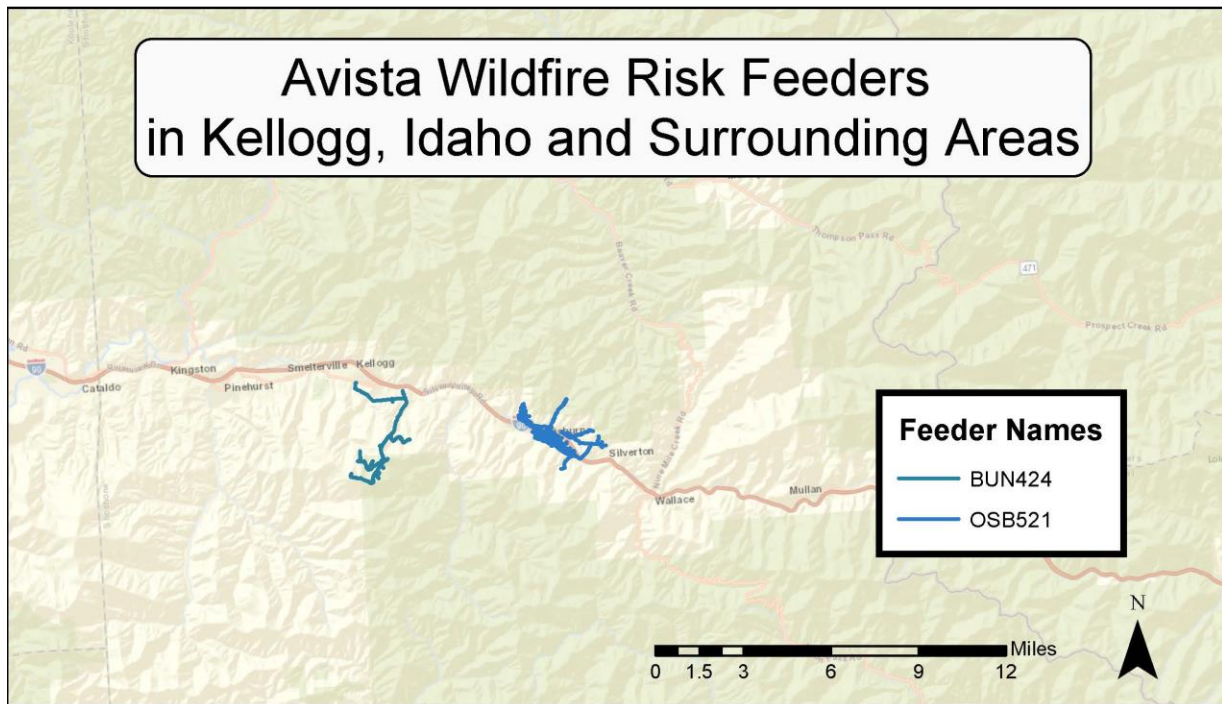
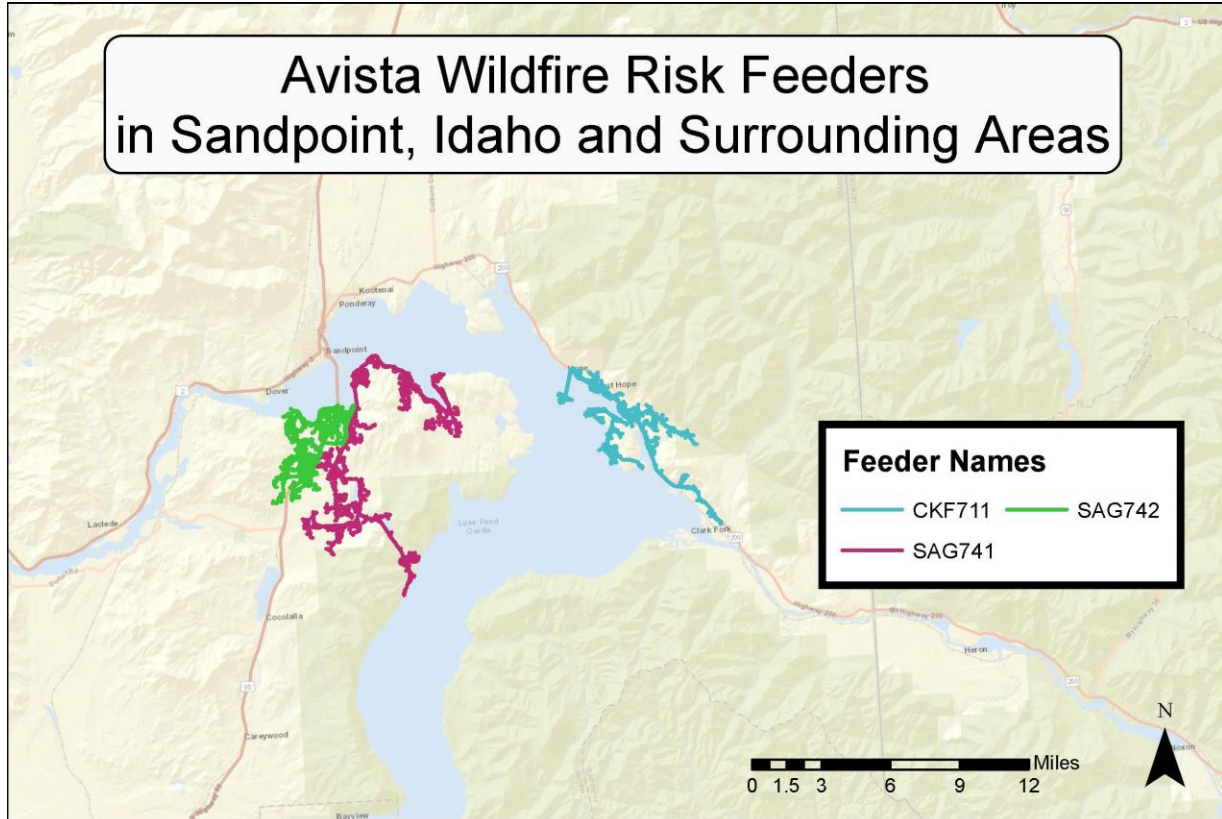


Figure 3
PSPS Sandpoint & Kellogg Risk Feeders Map

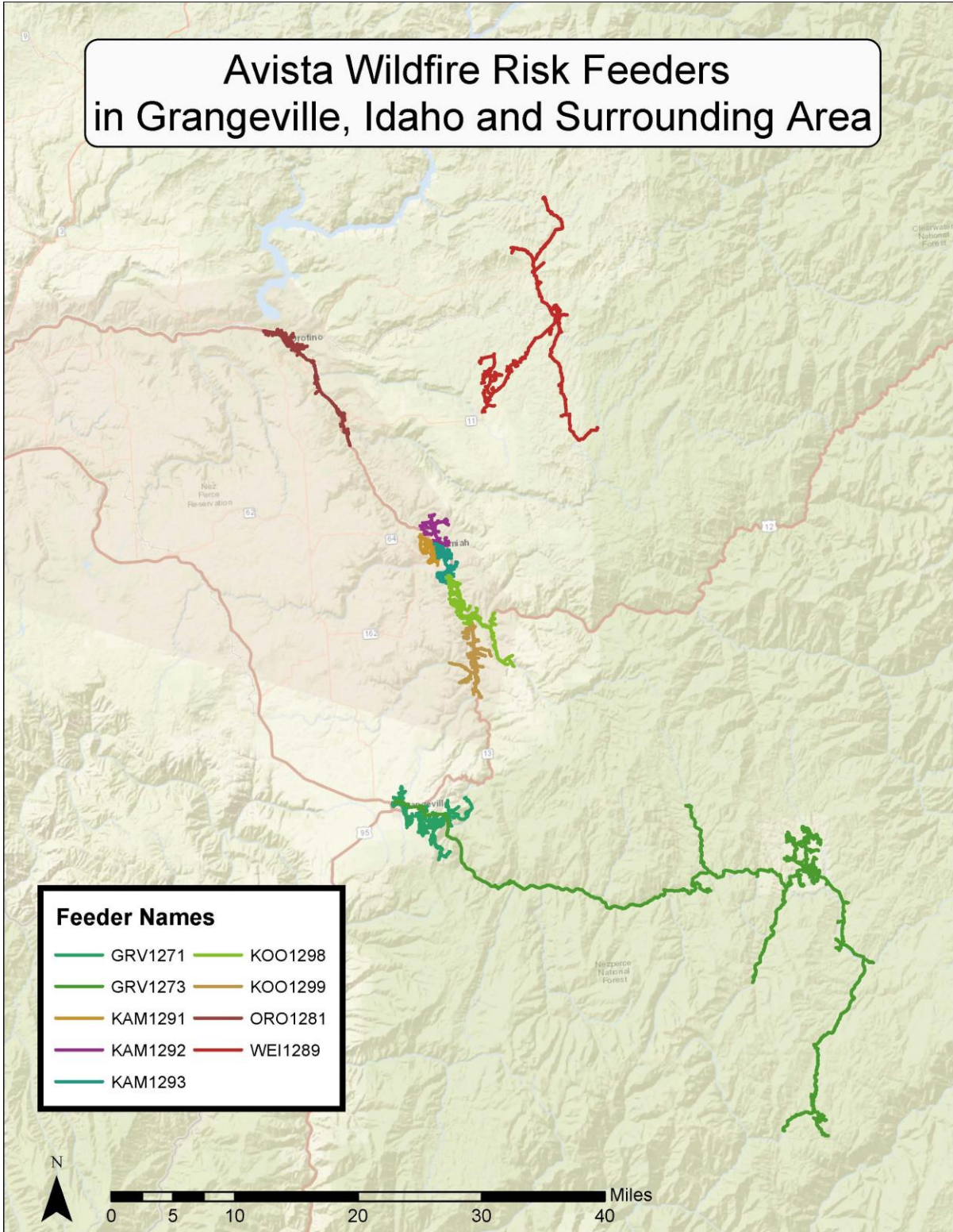


Figure 4
PSPS Grangeville Risk Feeders Map

5.2. PSPS Weather Monitoring and Review

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

5.2.1. *Fire Risk Index*

In addition to the Fire Risk Tiers (Low, Moderate, Elevated, High) Avista developed a Fire Risk Index (FRI) to compare ignition potential and wildfire spread potential across Avista's service areas. The FRI converts data on weather; prevalence of fuel (shrubs, trees, grasses); topography; community risk; historic summer outages; Severe Fire Danger Index; Fire Preparedness; and percentage of treed overhead spans into a numerical FRI score to forecast the short-term wildfire threat in geographical areas throughout Avista's service area. FRI scores range from 0 (very green, wet fuels with low to no wind or high humidity) to 9 (very brown and dry, both live and dead dry fuels with very low humidity and extreme wind speeds). FRI scores are grouped into the following 5 index levels:

- 1) Green (Low)—Risk of fire spread is low to near zero e.g., typical winter conditions: FRI score of 0 – 4.0
- 2) Blue (Moderate) – Risk of outage is high, while fire spread is low, or Risk of outage is low, while fire spread is high, or Risk of outage is moderate and fire spread is moderate: FRI score of 4.1 - 5.4
- 3) Yellow (High) (Extreme FSM) – Risk of outage is high, while fire spread is moderate, or Risk of outage is moderate, while fire spread is high, or Risk of outage is high and fire spread is high: FRI score of 5.5 - 6.4
- 4) Orange (Very High) (Extreme FSM) – Risk of outage is extreme, while fire spread is high, or Risk of outage is high, while fire spread is extreme, or Risk of outage is very high and fire spread is very high: FRI score of 6.5 to 6.9
- 5) Red (Extreme)— Risk of outage is extreme, and risk of fire spread is extreme FRI: >7.0

The FRI supports operational decision-making to reduce potential wildfire risk. Fire Safety Mode which includes enhanced protection settings are used beginning at an FRI of 5.5 to reduce the risk of potential ignition. The Company will consider the possibility

of initiating a PSPS when the FRI forecast is at 7.0 or greater, and where other factors applicable to the situation warrant such consideration. Factors to be considered may include, without limitation, fire risk potential, relative humidity, field observations and measurements, anticipated duration of events, geographic characteristics and critical infrastructure, wind direction and speeds, medically vulnerable populations, proximity to aid, utility resources available, etc. This list of considerations is non-exhaustive, as each weather situation is unique and involves unique characteristics, risks, and considerations. During wildfire season, Avista will determine a daily FRI on each feeder as described in our [2023 Wildfire Resiliency Plan](#) and related white paper documents.

5.2.2. National Weather Service Red Flag Warning

A Red Flag Warning (RFW) is a forecast warning issued by the National Weather Service (NWS) to inform the public, firefighters and land management agencies that conditions are ideal for wildland fire combustion and rapid spread. RFWs are often preceded by a Fire Weather Watch (FWW), which indicates weather conditions that could occur in the next 12–72 hours resulting in a Red Flag Warning.

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

The following thresholds are used by most NWS offices:

Daytime:

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

Nighttime:

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

Lightning:

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

Although Red Flag Warnings are used as a tool for forecasting, they are only one factor Avista considers when determining initiation of a PSPS event. Initiating a PSPS will

require a refined and focused approach for specific feeders rather than an entire geographic area; consequently, a RFW cannot be used as the sole determinative factor in whether to initiate a PSPS in any specific region or area.

5.2.3. Agency Input

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

6. PSPS OPERATIONS

6.1. General

PSPS preparedness is a cyclical effort involving Avista, public safety partners, state and local governments, communities and customers. Avista's main objectives of preparedness are: 1) performing wildfire prevention and mitigation activities; and 2) engaging with external public safety partners, critical facilities, tribal partners and communities to develop relationships and provide education to safely and effectively implement this plan. The Director of Electrical Engineering along with the Wildfire Resiliency Manager coordinate and facilitate activities of multiple Avista business units for wildfire prevention and mitigation activities while Business & Public Affairs, Customer Solutions and Corporate Communications facilitate public outreach and coordination efforts with external stakeholders.

6.2. Decision Process for PSPS

The weather monitoring and situational awareness criteria outlined in Chapter 5, in addition to other factors mentioned, will assist Avista in determining whether a PSPS event may be warranted. The decision of whether to initiate a PSPS in any given situation will be made by a team of individuals utilizing the information that is available to them at the time.

6.3 Event Response & Management

Avista will transition from **normal wildfire season operations** to **PSPS Watch** approximately 7-2 days prior to a potential PSPS event at the direction of the Director of Electrical Engineering (**Wildfire Lead**). During the **PSPS Watch** phase, Avista will

activate the **PSPS Assessment Team**, which includes Director of Electrical Engineering, Wildfire Resiliency Manager, Director of Business and Public Affairs (or delegate), a representative from Electric Operations (or Director), a representative from Corporate Communications (or Director), Regulatory, System Operations, Customer Service, Manager of Social Impact (or delegate) and Legal representatives. The PSPS Assessment Team will meet as needed to discuss current and forecasted weather conditions and other critical information regarding a potential PSPS event. The Director of Electrical Engineering will facilitate the PSPS Assessment Team meetings and conference calls to ensure operational readiness for a potential event. The Director of Electrical Engineering and Wildfire Resiliency Manager will provide a recommendation to the Wildfire Executive Committee taking into account input from other support roles on the PSPS Assessment Team. The Director of Electrical Engineering will determine whether to remain at a **PSPS Watch**, escalate to **PSPS Warning**, or de-escalate to seasonal **FSM operations**. The PSPS Assessment Team will decide if Avista will issue a preliminary notification of a potential PSPS event to public safety partners and critical facilities operators. The first notification to governmental agencies and emergency management partners could occur during the 7-2 day **PSPS Watch** phase.

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

During **PSPS Watch**, the PSPS Assessment Team will review the PSPS Plan and supporting documents. An operational risk assessment will be performed as well to determine risks and vulnerabilities. A determination will be made whether to escalate to **PSPS Warning** by the Director of Electrical Engineering approximately 48-24 hours in advance of a potential event. Within one hour of initiating a **PSPS Warning** notification, the **full PSPS team** will be **placed on stand-by** and team member availability will be determined. The **full PSPS team is the PSPS Assessment Team plus the Wildfire Executive Committee including the President and COO, VP of Energy Delivery, the VP of Community Affairs and Chief Customer Officer, Sr. VP and General Counsel, Sr. VP CFO Treasurer and Regulatory Affairs Officer and Director of Corporate Communications.**

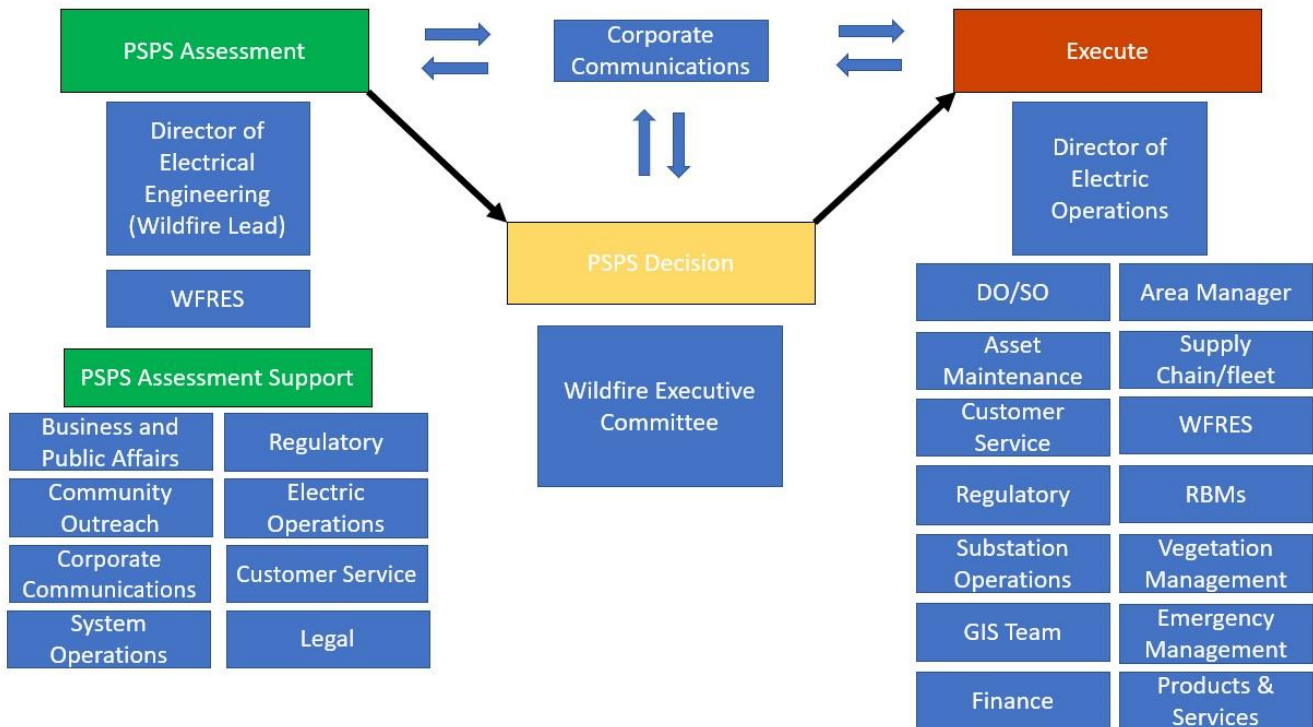


Figure 5
Organizational Process Flow

6.4. De-energization Protocols

Distribution Operations will develop the switching plan(s) for the PSPS execution after adoption of this PSPS plan. A final review of the switching plans by the Director of Transmission Operations and System Planning will be completed prior to any PSPS execution by the Electric Operations Director. The final approval to initiate a PSPS or not to initiate a PSPS will be provided by the **Wildfire Executive Committee**, in consultation with the **PSPS Assessment Team**. After the final approval to activate PSPS is received, the **Manager of Distribution Operations** receives instruction from the Electric Operations Director to execute de-energization protocols; the appropriate operator(s) will begin switching activities with field personnel (if necessary).

6.5. PSPS Recovery (Monitor, Patrol, Restore)

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

Named Communities.

One of the challenges when using PSPS is the process of re-energization. If a utility de-energizes lines for a PSPS event, facilities cannot be re-energized until all circuits and lines are thoroughly inspected or patrolled. After inspection, lines are re-energized segment by segment. Patrol of all impacted overhead electric facilities, both transmission and distribution, can only commence once the weather event has subsided. Restoration following a typical PSPS event normally requires three to six days, however, several PSPS events in California have taken up to 14 days for full restoration. Restoration efforts following a PSPS will always require additional time to fully inspect each circuit and line, even if they weren't damaged during the weather event.

It is important to note that a PSPS event and associated complexities related to patrol and repair work does not account for the outages on other circuits and there would likely be hundreds of such outages in an event of this magnitude.

The **hypothetical scenario modeled for this report** considered implementation of a PSPS with sustained winds (those lasting over a 2-minute period)² greater than 50 mph. It is important to note that in such conditions, circuits that have been placed in elevated or extreme protections schemes (and perhaps even more than that) would also likely be impacted. In other words, there would likely be additional damage to other distribution circuits and to the transmission system. In this scenario, there may be as many as 25 distribution circuits, with 1,500 miles of distribution line to patrol, as well as potentially 1,000 miles of transmission line to patrol. Transmission has been included here only to analyze potential resources needed; however, transmission is not being considered for PSPS.

One element of the PSPS restoration plan includes pre-staging two-man crews at known PSPS facility locations when conditions are safe to do so, since PSPS locations are identified in advance of the storm. The PSPS restoration plan also accounts for the need to assign additional resources to impacted transmission and distribution lines outside of the affected PSPS areas, with patrol activities commencing when the all-clear is given. Avista's goal is to complete patrol/inspection within the first 24-48 hours, but this estimate is heavily dependent upon the amount of damage the system sustained and crew availability.¹ It is also impacted by the ability to use aerial patrols, which may be grounded due to wind/weather.

² Note that assessment times are completely separate from repair times – one does not impact the other. In addition, this 24 hour estimate is only for the PSPS portion of the outages, which in this example would be 17 circuits, should take about 24 hours to patrol.

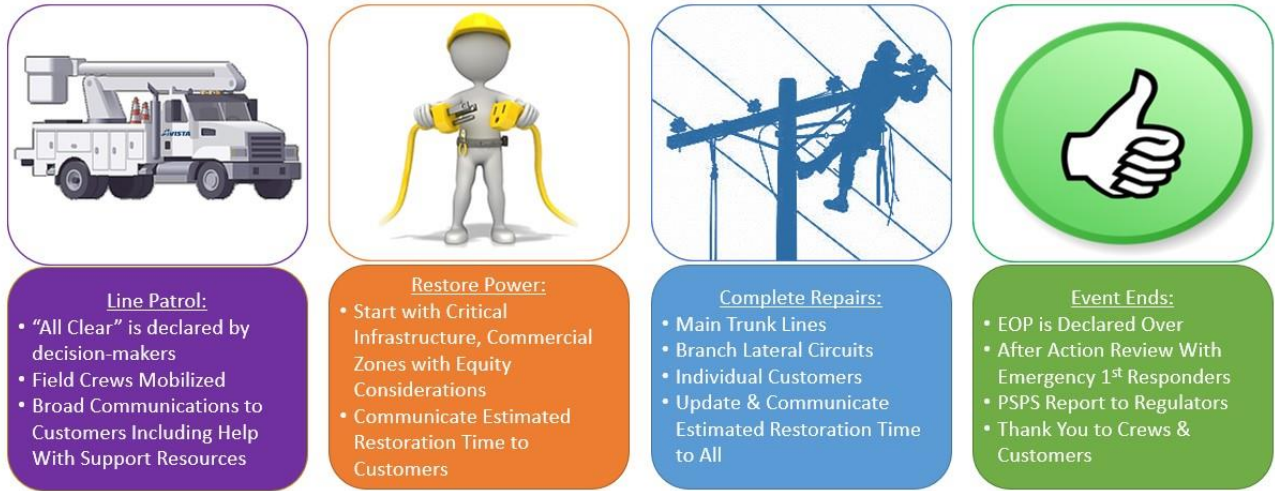


Figure 6
Restoration Process

Most, if not all, of Avista in-house resources would be focused on the patrol/inspection effort.³ Scenarios that would lead to consideration of a PSPS would likely be of a large enough magnitude for Avista to initiate a mutual assistance request from other utilities, as well as the need for outside contractors. Availability of these additional resources could have an impact on restoration time depending upon where these crews are based.

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

³ Avista has learned through experience that only about 80% of our total field resources are available at any given time (due to illness, vacation, etc.), meaning that in the event of a PSPS-level situation the Company will have about 125 qualified line personnel available.

7. ROLES & RESPONSIBILITIES

7.1. Electric Field Operations

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

7.2. Electric Distribution Operations

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

7.3. Director of Electrical Engineering

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

7.4. Wildfire Resiliency

- Oversee wildfire mitigation program (including this Plan) and support cross departmental collaboration.

- Monitor daily, weekly and long-term weather and wildfire forecasts.
- Monitor weather conditions for Fire Weather Watches, Red Flag Warnings and High Wind Watches and Warnings.
- Communicate with Washington Department of Natural Resources (DNR) and Idaho Department of Lands (IDL).
- Oversee operation of the Customer Resource Centers and designated contractor prior to and during PSPS event.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

7.5. Corporate Communications

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

7.6. Customer Service

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

7.7. Business and Public Affairs

- Communicate with external partners, governmental agencies, public safety partners and critical business customers on updates and status regarding PSPS watches, PSPS

warnings, activity and following a PSPS outage.

- Coordinate internally with Corporate Communications and Wildfire Executive Committee to ensure consistent communications with external partners and customers.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

7.8. Supply Chain Management

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

7.9. Fleet Management

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

7.10. Substation Operations

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

7.11. Vegetation Management

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

7.12. Products and Services

- Provide necessary updates to outage map vendor.
- Assist with Estimated Restoration Time calculations with the Operations Managers
- Update Internal Communications Portal with current Estimated Restoration Times (ERTs) during an event.
- Participate in AARs and ensure modifications to PSPS protocols are implemented as necessary.

7.13. Geographic Information Systems

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

7.14. Executive Officers

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

7.15. Legal

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

7.16. Regulatory

- May provide regulatory guidance in evaluating a potential PSPS event.

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

7.17. Emergency Management

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

7.18. Finance

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

8. COMMUNITY OUTREACH & PREPAREDNESS

8.1. Coordination with Public Safety Partners and Municipalities

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

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

8.2. Community Support

In addition to proactive outreach to public safety partners, municipalities and tribal entities, support will also be necessary for residential customers.

Outage Map

Effective communications regarding location of PSPS events and restoration times will be critical to

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

CARES Team

Avista has a Customer Service CARES Team which is engaged with medically vulnerable customers and acts as a liaison to support those customers. A PSPS event will greatly impact medically vulnerable customers necessitating additional outreach to ensure these customers have a plan needed to be prepared for the de-energization. The CARES Team will provide additional notifications to these customers who are considered Life Support in CC&B.

Community Resource Centers (CRCs)

Another way Avista will support customers during a PSPS event is to operate Community Resource Centers (CRCs). CRCs are an integral part in ensuring customers affected by PSPS events have access to basic resources and up-to-date information, during the PSPS event.

Avista utilizes a contracted vendor, FireDawg for logistical support in deploying CRCs during a PSPS event. CRCs will be activated once a PSPS de-energization is Imminent. The center(s) will generally be open from the beginning of a PSPS event, during Avista crew patrols, and final re-energization in communities affected. The typical hours of operation will be 8AM-8PM, unless otherwise noted. Avista will utilize brick and mortar facilities for CRC locations unless a facility is not available or feasible in which case the CRC contractor, FireDawg will deploy a large generator powered trailer or in last resort instances a tent. Avista personnel including available wildfire staff and Community Resource Ambassadors and the contracted vendor will staff the center(s) to assist and provide information to customers in need.

Avista has identified many potential locations for CRCs located throughout the service territory. Locations have been strategically chosen to provide the flexibility to select the location that best suits customers' needs based on event specifics. This work of formalizing agreements for CRC locations is ongoing and will continue to be developed into 2025 as more locations are secured. Avista will continue to work both internally and externally with local public safety partners, other community partners, and tribal leadership to identify appropriate CRC sites. A future appendix will be added which will generally include locations identified and specific details regarding the site configuration with maps and diagrams.

In most circumstances one CRC location will be established within each de-energized area and will provide the ability for the community to have specific needs met during a PSPS event.

Services/Resources generally provided include:

<ul style="list-style-type: none">• Shelter from environment• Air conditioning• Potable water & Non-perishable light snacks• Seating and tables• Restroom facilities• Refrigeration & Heating for medicine and/or baby needs• Interior and area lighting• On-site security• Televisions• Ice	<ul style="list-style-type: none">• Communications capability such as Wi-fi access, Sat Phone, Radio, Cellular phone etc.• Charging stations for Cell Phones, AM/FM/Weather radios, computers, medical devices, etc.• Portable ADA Ramp
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On an annual basis, Avista will evaluate the effectiveness of these tools and programs used to support customers and determine if changes are needed.

8.3. Proactive Customer Communications

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

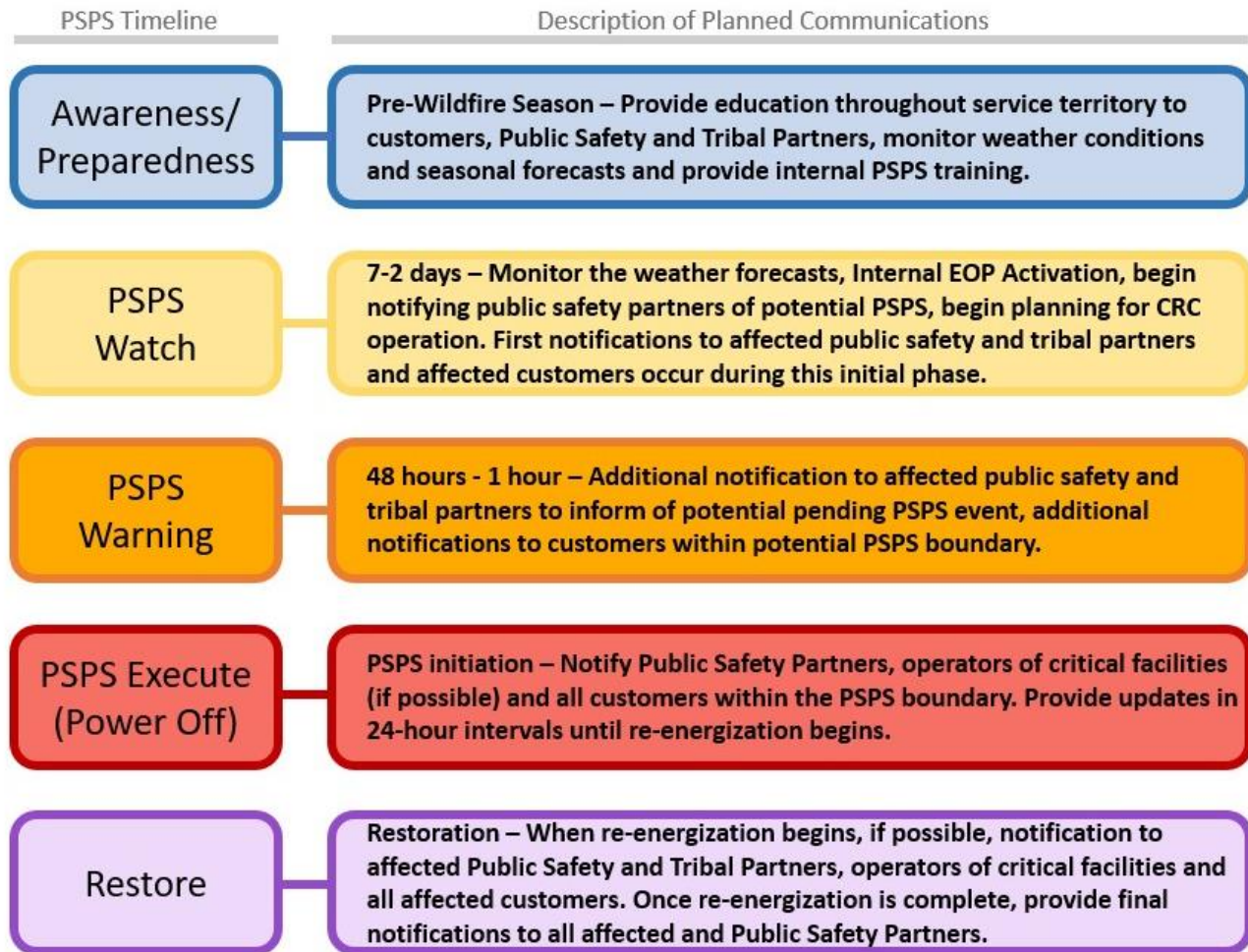


Figure 7
Communication Timeline

8.4. Information Sharing

Coordination with both internal and external partners is instrumental to the success of any emergency event. Avista will coordinate with public safety partners, municipalities, and industrial/commercial customers in advance of a PSPS event. This will help these partners prepare necessary communication functions and establish communication

protocols for critical decision-making before and during a PSPS event, including restoration activities.

9. CONTINUOUS IMPROVEMENT

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

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

10. FINANCIAL ADMINISTRATION

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

11. REPORTING

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

12. AFTER-ACTION REPORT

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

Generally, the After-Action Report could include:

- Explanation of the decision to de-energize, factors contributing to the decision.
- Explanation of how the utility determined that the benefit of de-energization

outweighed potential public safety risks.

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

13. TRAINING

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

14. EXERCISES

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

- Improving communication efforts with public safety partners which may include testing text and/or phone alerts
- Testing tactical operational plans such as reporting field observations or positioning employees at manually operated disconnects to test timing for de-energization and field inspections of distribution infrastructure

- Discussing and/or practicing roles and responsibilities of both strategic and tactical operations, including decision-making handoffs and hypothetical scenarios
- Discussing and/or developing re-energization plans
- Testing capacity limits on incoming and outgoing communications systems

Appendix A:

Avista PSPS Notification Plan

Overview

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

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

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

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

Objectives

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

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

Public Safety Power Shutoffs-Preparation

Building on the multi-channel communications supporting wildfire resiliency, in 2022 we turned our efforts toward operational changes, specifically changes to Dry Land Mode, now called Fire Safe Mode. We continued to notify customers that we had gone into our base-level Fire Safe Mode and implemented new notifications for all customers on impacted circuits when we went

into elevated or extreme settings. When there was a need for an elevated protection setting, we sent emails and did Interactive Voice Response (IVR) call-outs (recorded phone messages) to all customers on the impacted circuits, including times we planned to go into the elevated mode. While the existing communications and outreach plan and framework provide a solid foundation to build from, successful and effective implementation of a Public Safety Power Shut Off (PSPS) requires its own dedicated effort and strategy.

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

During a PSPS Event

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

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

Notification Methods:

- Customer email
 - Repurposed for internal communication to employees
- Customer IVR callout, initiate by Customer Service with messaging from Corp Comm
- Website banner and wildfire/PSPS page updates
- Social media channels, such as Facebook
- Outage map updated
- Outage texts sent to customers

- Messages amplified by regional partners and community-based organizations

Timeline During Event:

	Watch	Warning	Imminent	Happening	Restoration Begins	Restoration Complete
When:	72-48 hours	48-24 hours	4-1 hours	During	As soon as it's safe	PSPS is over
What:	PSPS is possible	PSPS looks necessary	Power is being shut off	Power is shut off	We have begun restoration	Restoration is complete
How:	<ul style="list-style-type: none"> • Email • IVR • Other appropriate channels • Partner CBOs 	<ul style="list-style-type: none"> • Email • IVR • Press Release • Social Media • Web banner and webpage updates • Outage map 	<ul style="list-style-type: none"> • Email • IVR • Social Media • Text alert • Web banner and webpage updates • Outage map 	<ul style="list-style-type: none"> • Email • IVR • Text alert • May include updates depending on estimated outage time • Social Media • Web banner and webpage updates • Outage map 	<ul style="list-style-type: none"> • Email • IVR • Press Release • Social Media • Web banner and webpage updates • Outage map to have updated ERTs 	<ul style="list-style-type: none"> • Email • IVR • Press Release • Social Media • Text alert • Web banner and webpage updates • Outage map to have updated ERTs

Coordination with Stakeholders:

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

- Wildfire Team
 - Fire Agencies
 - Emergency Medical Response Agencies
 - DNR/IDL
- Regulatory Officer
 - WUTC and/or IPUC
- Tribal Relations Advisor
 - Any impacted Tribal partners
- RBM Team
 - Local elected/community leaders
 - Red Cross
 - Community-based organizations

- AE Team
 - Critical infrastructure
 - Commercial customers
- CARES Team
 - Medically vulnerable customers
- Internal Corp Comm
 - Avista employees

Notification Cancellation

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