MONTANA WILDFIRE MITIGATION PLAN

PACIFICORP

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INTRODUCTION

Wildfire threats have been growing in the United States, and PacifiCorp has developed this plan describing its wildfire mitigation efforts in accordance with Montana statutory requirements. This Wildfire Mitigation Plan (WMP) guides the mitigation strategies that are or may be deployed in Montana. These efforts are designed to reduce the risk of utility-related wildfires and proactively mitigate the damage wildfires may cause to communities and to PacifiCorp facilities.

Wildfire has long been an issue of notable public concern. Electric utilities have understood there is a risk of a fire starting because of sparks emitted from an electrical facility, typically during fault conditions. The trend towards increased wildfire size and intensity has magnified these concerns. Increased human development in the wildland-urban interface, the area where people (and their structures) are intermixed with, or located near, substantial wildland vegetation, has increased the probability and costs of wildfires in terms of both harm to people and damage to property. A wildfire in an undeveloped area can have ecological consequences, some positive, some negative, but typically will not directly affect many people. A wildfire engulfing a developed area, on the other hand, can have significant consequences for both people and property. Despite the efforts of fire suppression agencies and increases in suppression budgets, the wildfire threat continues to grow. For these reasons, PacifiCorp is committed to mitigate the risk of wildfire from its operations and facilities.

The mitigations in this WMP describe the Company's plans to maintain and operate electrical lines and equipment in a manner that will minimize the risk of wildfire. In evaluating which operational strategies to deploy, PacifiCorp was guided by the following core principles:

- Systems that facilitate situational awareness and operational readiness are central to mitigating fire risk and its impacts.
- When a fault event does occur, the impact can be minimized by using equipment and personnel to isolate the fault event and shorten its duration.
- The frequency of ignition events related to electric facilities can be reduced by engineering more resilient systems that experience fewer fault events.

A successful plan also considers the impact on Montana communities and should balance costs, benefits, operational impacts, and risk mitigation to provide safe, reliable, and affordable electric service. PacifiCorp presents project proposals to the Company's Wildfire Risk Governance Committee, including the estimated incremental wildfire costs associated

with required system improvements and upgrades. There are currently no wildfire incremental costs associated with the Company's WMP and the transmission assets in Montana.

PacifiCorp applies certain mitigation efforts to the following transmission lines it operates in Montana:

- Yellowtail-Casper 230kV
- Bowler-Thermopolis 230kV
- Rimrock-Yellowtail 161kV
- Bowler-Yellowtail 230kV

PacifiCorp's WMP incorporates the Company's experience in wildfire mitigation as well as feedback and recommendations from stakeholders.

PacifiCorp's wildfire mitigation efforts in Montana are centered on operating practices, informed by ongoing wildfire risk analysis. The Company monitors situational awareness year-round in the applicable Montana territory, enabling the Company to target specific operational protocols in areas of heightened wildfire risk. These operating practices include advanced control systems and incremental patrols, which may lead to expedited corrections and vegetation clearing.

Many wildfire mitigation efforts, especially those driven by long-term, sustained risk factors, are focused on areas of highest wildfire risk, known as the Fire High Consequence Area (FHCA). To date, PacifiCorp's wildfire risk assessment has not identified any FHCA in its Montana service territory. As such, the Company's FHCA programs are not implemented in Montana. Nonetheless, baseline risk analysis is re-evaluated regularly, and the Company may designate FHCA in Montana in the future. Therefore, this plan describes FHCA programs for informational purposes.

1. Asset Risk and FHCA Mapping

1.1 Fire High Consequence Area (FHCA)

PacifiCorp has identified areas of heightened risk of wildfire, with delineated geographic areas referred to as the Fire High Consequence Area or FHCA. The FHCA sets geographic boundaries for wildfire mitigation programs, including enhanced asset inspection and vegetation management programs discussed in Section 2 and Section 3, respectively.

PacifiCorp uses FireSight, a commercially available tool from Technosylva, to model the risk of wildfires igniting in its service territory. The tool simulates the spread of wildfire from an ignition point and estimates the consequence. PacifiCorp calculates separate FireSight risk scores of 0-1 for wind-driven and fuel/terrain-driven wildfires to evaluate the FHCA boundaries. Circuit segments with a wind-driven or fuel/terrain-driven score of 0.85 or above are added to the FHCA boundary. PacifiCorp has analyzed its Montana transmission assets and the geographic areas surrounding them, and these areas do not meet the FHCA score of 0.85 or greater. PacifiCorp evaluates the FHCA annually to incorporate new data, modeling techniques, and stakeholder input. As part of that process, PacifiCorp plans to confer with state and local agencies, and possibly other private stakeholders, and integrate updated FHCAs into future WMPs.

2. Inspection and Correction

2.1 Inspection and Maintenance Program Overview

PacifiCorp's inspection and maintenance program is structured to align with industry standards and recognized best practices. Regular and systematic inspection of power lines is a cornerstone of prudent utility management and sound industry practice. These inspections may enable early detection and correction of issues such as damaged conductors, deteriorated poles, vegetation encroachments, and hardware defects that could otherwise contribute to ignition events, equipment failures, or safety hazards. By maintaining inspection schedules consistent with industry best practices, the Company demonstrates due diligence in keeping its facilities in safe operating condition. Timely inspections and corrective actions may help reduce wildfire and reliability risks, protect the public and employees, and preserve utility assets. This proactive approach reflects both a prudent investment in system reliability and a reasonable measure to safeguard against foreseeable fire and safety risks inherent to electric infrastructure.

PacifiCorp performs routine inspections as dictated by Company policies (referenced below) and completes annual visual assurance patrols across both retail and non-retail service territory.

During standard inspections on an asset, inspectors use a predetermined list of condition codes and priority levels (defined below) to describe any noteworthy observations or potential noncompliance discovered during the inspection. Once recorded, the condition codes are used to establish the scope of and timeline for corrective action to maintain conformance with National Electric Safety Code (NESC) requirements and Company policies. This process is designed to correct conditions while reducing impact to normal operations.

Key terms associated with the inspection and correction programs are defined as follows:

- **Visual Assurance Inspection:** A brief visual inspection performed by viewing each facility from a vantage point allowing reasonable viewing access. Visual assurance inspections are intended to identify clearance violations, damage or defects to the transmission and distribution system, or other potential hazards or right-of-way encroachments that may endanger the public or adversely affect the integrity of the electric system, including items that could potentially cause a spark. (Policy 011)
- **Detailed Inspection**: A careful visual inspection accomplished by visiting each structure, as well as inspecting spans between structures. This inspection is intended to identify potential nonconformance with the NESC or Company standards, infringement by other utilities or individuals, defects, potential safety hazards, and deterioration of the facilities that need to be corrected to maintain reliable and safe service. (Policy 009)
- **Pole Sound and Bore:** An inspection performed by sounding the pole to locate external and internal decay pockets. The pole is tapped with a metal hammer to identify potential soft spots or hollow-sounding areas. If decay is suspected, inspection holes are drilled to determine the extent of the internal decay. (Policy 013)
- **Pole Test and Treat:** An inspection of wooden poles to identify decay, wear, or damage. Inspections may include pole-sounding, inspection hole drilling, and excavation to assess the pole condition at groundline to identify the need for any repair or replacement. When applicable, preservative treatment is also applied as part of this inspection. (Policy 013)
- **Enhanced Inspection:** A supplemental inspection performed that exceeds the requirements of normal detailed or visual inspections; typically, a capture of

infrared data, a drone inspection, or an off-cycle inspection performed to support significant weather events or times of critical wildfire risk. (Policy 358 & Policy 371)

- **Patrols:** Visual inspections performed in addition to scheduled inspection cycles. Patrols can be performed prior to or during significant weather events and are usually performed prior to re-energization of lines in FHCA during fire season. Patrolling can result in conditions being identified and corrected, similar to scheduled inspections. Patrolling activities are further discussed in Section 6.3.
- **Condition:** As the result of an inspection, a condition reports the state of an asset regarding appearance, quality, or working order. Conditions may indicate potential impacts to normal system operation, NESC violation, other utility or private clearances. (Procedure 069)
- **Energy Release Risk Condition:** A type of condition that, under certain circumstances, can correlate to increase the risk of a fault event and potential release of energy at the location of the condition.
- **Condition Codes:** Predetermined list of codes for use by inspectors to efficiently capture and communicate observations and inform the scope of and timeline for potential corrective action.
- **Correction:** Scope of work required to remove a condition within a specified time frame.
- **Priority Level:** The level of risk assigned to the condition observed, as follows:
  - **Imminent** – imminent risk to safety or reliability
  - **Priority A** – risk of high potential impact to safety or reliability
  - **Priority B** – low or moderate risk to safety or reliability

2.2 Standard Inspection and Correction Programs

PacifiCorp's asset inspection programs involve four inspection types: (1) visual assurance inspection; (2) detailed inspection; (3) pole sound and bore; and (4) pole test and treat. Inspection cycles, which establish the frequency of inspections, are set by PacifiCorp's asset management department. In general, visual assurance inspections are conducted more frequently, to quickly identify any obvious damage or defects that could affect safety or reliability. Detailed inspections have a more comprehensive scope of work, so they are performed less frequently than visual assurance inspections. Pole test and treat (including sound and bore inspections) are more intrusive and target finding internal decay. The frequency of these intrusive inspections is based on the age of wooden poles, and such inspections are typically scheduled in conjunction with detailed inspections. Regardless of the inspection type, any identified conditions are entered into PacifiCorp's facility point inspection system database for tracking purposes. For any condition identified, the

inspector will assign a condition code and the associated priority level. Corrections are then scheduled and, when feasible, completed within the correction time frames established by internal Company policies, as discussed below. While the same condition codes are used throughout PacifiCorp's service territory, the time frame for corrective action varies depending on location, wildfire risk area, and if the condition has the potential to release energy. In all cases, the timeline for corrections considers the priority level of any identified condition.

Inspection Frequency

Consistent with industry best practices, inspections are the Company's preferred mechanism to identify conditions. PacifiCorp believes that having more frequent inspections is an important mitigation strategy. More frequent inspections may identify conditions earlier, allowing for timely corrective action. Reducing the duration that a condition exists on the system may lower the risk of a fault event or release of energy.

Inspection frequencies for Montana asset types are summarized in Table 2-1.

Table 2-1: Planned Inspection Frequency

Inspection Type*	Standard Inspection Frequency (Years)
Visual Assurance	1
Detailed	2
Pole Sound and Bore	10
Pole Test and Treat	10

2.3 Enhanced Inspections

PacifiCorp's enhanced inspection programs use alternate technologies such as infrared or drone imagery to supplement visual inspections and identify hot spots, equipment degradation, and potentially substandard connections.

The infrared inspection program can be performed on transmission lines. The identified lines are grouped by peak loading intervals for the inspections to be performed. The infrared data may identify thermal rises in equipment, which could be a potential issue not visible through other inspection programs. Drone inspections are performed using an unmanned aerial vehicle, or drone. A drone can provide enhanced imagery, alternate perspectives, and the ability to package new technology (LiDAR, infrared, detailed imagery) to view assets and assess conditions.

3. VEGETATION MANAGEMENT

Vegetation management on transmission lines focuses on removing tall and fast-growing trees where rights-of-way exist. Where rights-of-way do not exist, vegetation is pruned, maintaining clearances between vegetation and electrical facilities. These clearances vary according to the transmission line voltage. At all times, PacifiCorp must maintain the required minimum clearances set forth in FAC-003-05,[1] which are referred to as the Minimum Vegetation Clearance Distance (MVCD). To determine whether work is needed, an action threshold distance is applied; work is required if vegetation has grown within the action threshold distance.

When work is completed, vegetation is removed or pruned to a minimum post-work clearance distance. The applicable distances for various transmission line voltages are shown in Table 3-1. Hazard trees are identified for removal in any vegetation inspection. To identify hazard trees, the inspector applies the vegetation management best practices set forth in ANSI A300 Tree Care Standards (Part 9).

Table 3-1: Transmission Minimum Vegetation Clearance (in Feet) by Line Voltage

Minimum Clearance Type	500 kV	345 kV	230 kV	161 kV	138 kV	115 kV	69 kV	45 kV
Minimum Vegetation Clearance Distance (MVCD)	8.5	5.3	5.0	3.4	2.9	2.4	1.4	N/A
Action Thresholds	18.5	15.5	15.0	13.5	13.0	12.5	10.5	10
Minimum Post-Work Clearances	50	40	30	30	30	30	25	20

In some circumstances, when local conditions and property rights-of-way allow, PacifiCorp may use Integrated Vegetation Management (IVM) practices to prevent vegetation growth from violating clearances by proactively managing the species of trees and other vegetation growing in the rights-of-way. Under such an approach, the Company may remove tree species that could potentially threaten clearance requirements, while encouraging low-growing cover vegetation, which would prevent clearance issues.

[1] See Table 2, Over 10,000 ft up to 11,000 ft of FAC-003-05. FAC-003-5. Sourced Dec. 11, 2025.

Main grid transmission lines are inspected annually. Vegetation work is scheduled dependent on several local factors, consistent with industry standards and best management practices.

4. System Strengthening

PacifiCorp's electrical infrastructure is engineered, designed, and operated in a manner consistent with utility best practices, enabling the delivery of safe, reliable power to all customers. When installing new assets as a part of corrective maintenance or growth projects, PacifiCorp endeavors to incorporate the latest technology and engineered solutions that have been assessed and proven to be effective. When conditions warrant, PacifiCorp engages in strategic system strengthening, such as replacing or modifying existing assets and/or using a new design or technology to make the asset more resilient. With the growing risk of wildfires, the Company may supplement existing asset replacement projects with system strengthening programs designed to mitigate operational risks associated with wildfire.

System strengthening programs are designed in reference to the equipment on the electrical network that could be involved in the ignition of a wildfire or be subject to an existing wildfire event. In general, system strengthening programs reduce the occurrence of events involving the emission of sparks (or other forms of heat) from electrical facilities or reduce the impact of an existing wildfire on utility infrastructure. System strengthening programs are an important long-term mitigation tools available for use by electric utilities.

No single system strengthening program mitigates all wildfire risk related to all equipment types. Individual programs address several factors, different circumstances, and different geographic areas. Each program described below shares the common objective of reducing overall wildfire risk associated with the design and type of equipment used to construct electrical facilities. In prioritizing particular design or equipment elements, these programs also consider environmental factors impacting the magnitude of a wildfire. Extreme weather conditions such as dry and windy conditions present an increased risk of wildfire ignitions and spread. Consequently, system strengthening programs may specifically attempt to reduce the potential of an ignition event when conditions are dry and windy by using equipment that is less likely to release energy if failure or contact with foreign objects occurs.

System strengthening cannot prevent all ignitions, no matter how much is invested in the electrical network. Equipment does not always work perfectly and, even when manufactured and maintained properly, can fail; in addition, external forces and factors can impact equipment, including from third parties and natural conditions. Therefore,

PacifiCorp cannot guarantee that a spark or heat coming from equipment owned and operated by the Company will never ignite a wildfire. Instead, the system strengthening efforts seek to reduce the potential of an ignition associated with any electrical equipment by making investments with targeted system strengthening programs.

4.1 Line Rebuild Program

Transmission lines within an FHCA constructed with bare overhead wire are evaluated for potential system strengthening work. As a part of this program, certain overhead lines may be retrofitted with more resilient materials (e.g., non-wooden poles). After completion of system strengthening, such lines will be more tolerant to incidental ignitions, thereby reducing the risk of wildfire. Because the Company currently has no FHCA in Montana, it has no plans to incur line rebuild costs in 2026.

Pole Upgrades and Replacement

Traditionally, overhead poles are replaced or reinforced within the service territory consistent with the NESC, Company policies, and prudent utility practices. When a pole is identified for replacement, typically through routine inspections and testing, major weather events, or joint use accommodation projects, a new pole consistent with engineering specifications suitable for the intended use and design is installed in its place.

Pole Wrap

Depending on the pole configuration and location, PacifiCorp may also install a fire mesh wrap around transmission wooden poles in areas of heightened wildfire risk. The wrap is applied to protect the poles from fire damage in the event of a wildfire. Pole wraps also may be applied on poles scoped for replacement with steel poles as an interim solution.

4.2 Advanced System Protection and Control

PacifiCorp uses microprocessor relays for operational improvements system-wide. These relays can exercise programmed functions intended to mitigate the duration and magnitude of fault events. Additionally, microprocessor relays allow for greater customization to address environmental conditions through a variety of settings. They also are better able to incorporate complex logic to execute these operations. These functional features allow the Company to use more refined settings for application during periods of greater wildfire risk. These practices are discussed in Section 6. Microprocessor relays are also often integrated with Supervisory Control and Data Acquisition (SCADA), allowing remote monitoring and control of the device. For transmission assets in Montana the Company uses SCADA capability of microprocessor relays to mitigate risk via operational practices outlines in Section 6.

5. SITUATIONAL AWARENESS

The Company uses the FHCA as its baseline risk map, layered with a risk driver analysis to inform long-term strategic investment and modifications to asset inspections and vegetation maintenance practices. However, as climate and weather patterns change, extreme weather events are predicted to become more frequent, and the potential exists for seasonal, dynamic, and/or isolated risk events to occur that compound or deviate from this baseline risk approach. Therefore, a sophisticated, dynamic risk model grounded in situational awareness is pertinent to ensure electric utilities know when, where, how, and why to take risk mitigating actions in the short term.

The Company's approach to situational awareness includes the acquisition of data to forecast, model, and assess the risk of potential or active events to inform operational strategies, response to local conditions, and decision-making. These key components, as illustrated in Figure 5-1 and described below, rely on a core team of utility meteorologists to continuously evolve the tools and technology, and leverage their expertise to guide action.

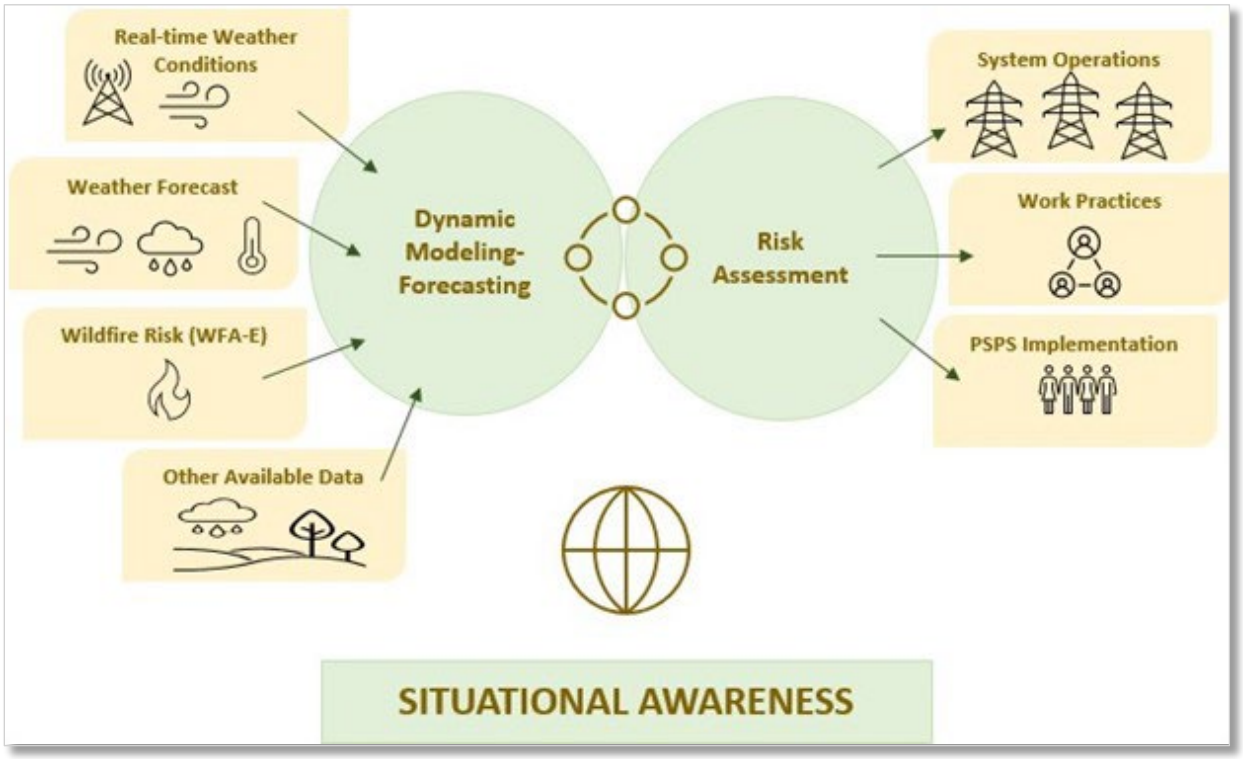

Figure 5-1: Overview of Situational Awareness

5.1 METEOROLOGY

As described above, the ability to gather, interpret, and translate data into an assessment of utility-specific risk and informed decision-making is a key component of the Company's

situational awareness capability. To support this effort, the Company developed a Meteorology Department, which consists of meteorologists who develop forecasts, along with a data scientist, operations managers, and a director to lead tools, processes, and strategy. The team's experience includes decades of weather and fire weather forecasting for various government and private-sector entities.

The objectives of the Meteorology Department are to supplement the Company's short-term risk analysis capabilities by:

- Utilizing and evolving real-time risk assessment and forecasting tools,
- Identifying and closing any forecasting data gaps,
- Managing day-to-day weather-related system impacts threats and risks, and
- Providing information to internal operation groups to inform and recommend changes to operational postures during periods of elevated risk, as depicted in Figure 5-2 below.

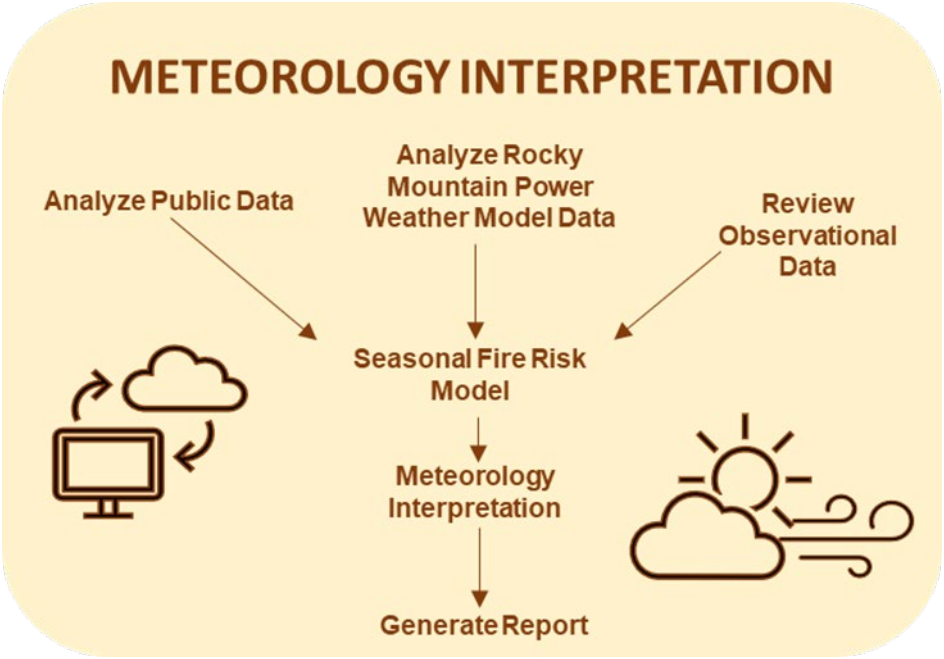

Figure 5-2: Meteorology Weather/Fire Assessment

The Meteorology Department also coordinates with government agencies that provide additional weather and fire risk information relevant to the service territory and the Company's assets. For instance, during high-risk weather events, the Company's meteorologists participate as a represented partner in coordination calls hosted by the National Weather Service and/or the Geographic Area Coordination Center (GACC). The Meteorology Department also participates in these calls to discuss forecasting discrepancies and seek or provide clarity regarding external messages from a utility or the

National Weather Service. The systems and tools used are summarized below and are combined with additional real-time data points, along with the experience of the team, to create actionable short-term forecasts.

5.2 Numerical Weather Prediction

An impacts-based forecasting system consisting of an operational Weather Research and Forecasting (WRF) model and a complementary WRF reanalysis across the Company's entire service territory form the foundation of the meteorology program. The Company has continued to use its WRF reanalysis and other training data to build and train machine learning models, which will continue to improve its operational thresholds, and has converted its weather forecasts into predictions of system impacts. To assess confidence in the calculated values, forecasts are actively monitored to assess trends and potential convergences or divergences between forecasts and actuals during periods of elevated risk.

Operational WRF Model

The Meteorology Department uses a twice-daily, two-kilometer-resolution, hourly WRF model. The model produces a comprehensive forecast of atmospheric, fire weather, and National Fire Danger Rating System (NFDRS) parameters out to a timescale of 126 hours. The model's high resolution gives a much more complete picture of finer-scale atmospheric features than what is available with most public four-day-ahead timescale models. In addition, the WRF data are overlayed on overhead transmission lines.

WFR Reanalysis

PacifiCorp's Meteorology Department developed a two-kilometer-resolution, hourly reanalysis for weather climatology covering the entire service territory. The WRF reanalysis uses the same configuration and contains the same weather, fire weather, and NFDRS parameters as the Company's operational WRF to minimize any potential forecast biases between the two datasets. The only difference is that the reanalysis is downscaled from a longer time scale weather computer model compared to the operational WRF. These reanalysis data were correlated with historic outage data and wildfire events using statistical and machine learning techniques to improve the Company's weather-related outage and wildfire risk thresholds. Output from the Company's operational WRF model is then ingested by the Company's machine-learning models and geographic information systems (GIS) tools to convert the daily forecast into potential circuit-level system impacts and to map the intersection of fire weather and outage-related risks across its service territory. The WRF reanalysis also provides a daily circuit-level view of weather and fire metrics relative to the past 33 years and, based on these historic data, an assessment of whether the forecast weather event would historically have resulted in an outage on that

circuit. The historical reanalysis is updated annually so that data are as accurate as possible when determining climatological thresholds for weather-related outage percentiles and decision-making for public safety power shutoff (PSPS) thresholds.

Continual Improvement

The Company's WRF domain covers the entirety of PacifiCorp's retail and non-retail service territory. From 2021 to 2022, PacifiCorp procured two high-performance computing clusters (HPCCs) to provide the computational resources needed to run an operational WRF and the WRF reanalysis. The two systems provide a high-resolution forecast of the WRF domain twice daily through a single, deterministic model. This WRF model has allowed the Company to take meaningful action in advance of severe weather to reduce restoration times, plan for resourcing, and increase reliability. However, the model does not account for multiple weather scenarios, which makes it more difficult to forecast the types of low-probability, high-impact weather events that are becoming both more common and more impactful.

To address this issue, during 2024-2025 the Company developed a multi-member WRF ensemble weather model. To support the new ensemble system, the Company purchased three new HPCCs. These new supercomputers will provide the computing power needed to implement the new forecasting system and, at the same time, allow for full system redundancy, which can be critical during severe weather events. The Company also upgraded the two existing HPCCs, increasing forecasting from 3.5 days to 5 days and shifted to a 5-day WRF forecast in the second quarter of 2025. The new ensemble system was completed and became operational in the fourth quarter of 2025. This new forecasting system enables analysis of multiple weather scenarios simultaneously, thereby improving the accuracy of the Company's forecasts and its ability to respond to severe weather in advance.

Operational Flow for Wildfires

PacifiCorp established the Wildfire Intelligence Center (WIC) in 2025 to provide 24/7 all-hazard monitoring and early wildfire detection across its system. The WIC shifts the Company from reactive, 911-based notification to a proactive intelligence model, using camera networks, agency dispatch, official sources, and other open source intelligence to assess threats and support decisions related to resource deployment and potential de-energization under SOP 203.

The Company also established a Wildfire and Emergency Response team in 2025, composed of experienced wildland firefighting and complex incident management personnel. This team provides on-scene liaison support during fires and other hazards,

strengthens coordination with local fire agencies, and leads pre-season outreach, joint training, and relationship-building with response partners.

Together, these programs enhance situational awareness and wildfire readiness. Improved monitoring and structured triage increased PacifiCorp's wildfire intelligence coverage and wildfire monitoring capabilities by more than 600 percent in 2025 compared to all wildfires responded to in 2024, while reducing emergency de-energizations by more than 50 percent. WIC monitoring capabilities extend into Montana to cover the Company's Montana transmission assets.

Through implementation of this WMP, WIC monitoring capabilities extend to the Montana transmission assets.

5.3 Wildfire Risk Models and Tools

PacifiCorp leverages a variety of models and tools to assess dynamic wildfire risk. These tools are described in the subsections below. The Company uses an internally developed historical analysis, delivering the most reliable fire risk metrics across its service territory while incorporating historical fire data from 1999 through 2020. This analysis, which provides thresholds for wildfire mitigation strategies, is comprised of a fuel dryness metric, a measure of vegetation fuel moisture, and a fire spread variable, or a metric to signify how a fire would spread under certain conditions.

FireRisk and FireSim

The Company procured and implemented Wildfire Analyst Enterprise (WFA-E), the broad suite of wildfire risk modeling tools from Technosylva. WFA-E includes two seasonal wildfire models, FireRisk (formerly FireCast) and FireSim, which the Company uses to forecast the risk of wildfire and the potential behavior of a wildfire, should one occur. The inputs for the various WFA-E models are similar. They are, however, used for different purposes. FireRisk performs simulations daily to assess wildfire risk more broadly, while FireSim is used to simulate growth and spread of specific and unique fire events.

FireRisk: FireRisk performs millions of wildfire simulations daily across the Company's service territory to provide a 126-hour look ahead that identifies the risk of wildfire (both of ignition and impact) in particular locations. This output is then combined with transmission asset location data to provide location-specific wildfire risk and consequence forecasts. It is important to note that the asset location data do not determine the probability of a utility asset causing an ignition but, instead, are used to inform operational decision-making.

FireRisk outputs include the following information:

- An assessment of the potential for a wildfire, given fuel, weather, and other conditions.
- A simulation of how a wildfire would behave in the event of an ignition. This would include, for example, the forecasted rate of spread, size, and flame length.
- Data on the population threatened and potential impact to assets (e.g., identification of buildings that would be threatened in the event of a wildfire).

FireSim: FireSim runs simulations that forecast potential fire behavior and spread from a 1- to 126-hour period and assesses the potential impact on populations, buildings, utility assets, and other resources in the field. FireSim's model assumes no suppression efforts to slow the fire's spread and considers the following elements:

- **Initial Attack Assessment:** Assessment of how difficult initial attack could be for first responders and the probability of stopping the fire within the first operating period.[2]
- **Population at Risk:** Projection of the number of people in the path of the fire and the timing of when the fire is likely to arrive.
- **Assets at Risk:** Physical assets like utility equipment, residential and commercial structures, barns, outbuildings, and other structures, and the timing of when the fire is likely to arrive.
- **Places at Risk:** Locations identified on the maps that may not be physical assets but have other significance. These could include parks, reservoirs, cultural sites, campgrounds, or other locations.
- **Weather and Fuels Conditions:** Wind speed, direction, fuel moisture content.

FIRE POTENTIAL INDEX

The Company uses the Technosylva Fire Potential Index (FPI) to accompany other wildfire metrics for determining wildfire potential across Montana. The FPI is a supplementary metric that quantifies the potential for large or consequential wildfires based on weather, fuels, and terrain. The FPI is used to guide operational decision-making as it relates to wildfire risk and spread.

The following three inputs contribute to the final FPI score:

- **Complex Fuel Model:** Assesses the type of fuels and the time elapsed since the last fire to quantify how the fuels may affect fire behavior, type, and suppression

[2] More information on initial attack assessment is available at https://help.wildfireanalyst.com/wfae/initial-attack-assessment-iaa. Sourced Nov. 10, 2025.

difficulty. The model considers fire history, fuel growth, and fuel dryness over time in response to weather conditions to support accurate wildfire modeling.

- **Weather Conditions:** These consist of a combination of wind gusts, temperatures, and fuel conditions. For wind-driven risk events in particular, the Company has identified some geographically driven patterns that correlate to higher risk.
- **Terrain Difficulty Index**: Represents the level of geographical complexity to access an area. For instance, regarding fuels and terrain-driven risk events, large areas of contiguous complex fuel and terrain in areas of limited or difficult access present the greatest risk when fuel is dry and weather is hot and dry.

The scores from these inputs are then correlated to a level of fire risk in Figure 5-3 below, which shows the FPI scoring scale and percentiles. An FPI value or FPI percentile can then be used to determine the FPI risk level. For instance, FPI values >37.5 or percentiles >99% indicate that fire risk is extreme. In contrast, an FPI value <5 or percentile <60% indicates that fire risk is very low.

FPI Category	FPI Values		FPI Percentiles
Very Low	<5		<60
Low	5-10		60-80
Moderate	10-13.5	OR	80-85
High	13.5-23		85-95
Very High	23-37.5		95-99
Extreme	> 37.5		>99

Figure 5-3: Fire Potential Index Scale

5.4 Application and Use

The Company's Meteorology Department leverages the various analysis, model outputs, and indices described above to produce a district-based, weather-related system impact forecast.

Assessing District Fire Risk

The Meteorology Department combines a variety of metrics to produce both a district-level forecast and a polygon-level forecast (which assigns a risk level at the circuit level) that guide operational decision-making. Additionally, when determining whether to raise the FPI risk level to elevated, significant, or extreme, the Meteorology Department also performs an

additional review of fuels and fire weather forecasts and observations using some or all the resources identified in Table 5-1 below.

Table 5-1: Additional Resources for District Fire Risk Assessment

Risk Assessment Resources	Description
Burning Index (BI)	The BI is derived from a combination of Spread and Energy Release Components expressed as a numeric value closely related to flame length in feet multiplied by 10. It is a number related to the contribution of fire behavior to the effort of containing fire.
Energy Release Component (ERC)	ERC is a composite fuel moisture value that measures the contributions all live and dead fuels have to potential fire intensity. The ERC is a cumulative or "build-up" type of index. As live fuels cure and dead fuels dry, the ERC values get higher, thus providing a good reflection of conditions.
Evaporative Demand Drought Index (EDDI)	EDDI identifies anomalous atmospheric evaporative demand and provides an early warning of increased wildfire risk.
Fire Potential Index (FPI)	FPI quantifies the potential for large or consequential wildfires based on weather, fuels, and terrain.
Fuels Conditions (live and dead fuels)	Includes observations of the local fuel conditions including 1, 10, 100, and 1000-hour dead fuel moisture, herbaceous and woody live fuel moisture, tree mortality, Energy Release Component, etc.
GACC products	Includes Seven-Day Significant Wildfire Potential, Fuels & Fire Behavior Advisories, and other outlooks or discussion products.
High-Resolution Fire Weather Forecasts	PacifiCorp runs a 2-km WRF model, which produces a twice daily territory-wide forecast of fire weather conditions across a 96-hour time horizon.
National Weather Service Watches or Warnings	Includes Fire Weather Watches, Red Flag Warnings, High Wind Warnings, and other products issued by the National Weather Service.
Vapor Pressure Deficit (1-month running average)	A measure of the atmospheric demand (thirst) for water. Values above the 94th percentile have been associated with large wildfires.
Wildfire Analyst Enterprise (WFA-E) model	Millions of wildfire simulations are performed daily to map out potential wildfire risk and consequence across the service territory.

These resources include tools such as wildfire consequence modeling and high-resolution models to identify localized areas of greatest risk. Additionally, the Meteorology Department may collaborate with the local National Weather Service office and/or the regional GACC office if there is significant or extreme wildfire risk. After evaluating these resources, the Meteorology Department determines the risk level for each operational area. The operational area fire risk is integrated into a five-day forecast. The forecast is used to support decision-making related to implementing operational, short-term risk mitigation programs and measures, discussed in Sections 6.

WILDFIRE FUEL AND TERRAIN POLYGONS

In 2025, the Company modified its short-term forecasting process by grouping areas of similar terrain and vegetation height into polygons using a land cover data layer. Various data sources, including internal pole pictures, satellite views of terrain and vegetation, and the Multi-Resolution Land Characteristics (MRLC) Consortium data set, were used to understand the terrain and vegetation for any one location. Subject matter experts reviewing the initial land cover data set categorized vegetation as either "tall" or "short," based on whether it was tall enough to potentially interfere with poles or lines. Terrain was categorized as either "steep" or "flat," based on whether it was steep enough for fire to spread rapidly in the absence of wind. Following this methodology, the service territory is divided into the following categories:

- Tall vegetation – steep terrain
- Tall vegetation – flat terrain
- Short vegetation – steep terrain
- Short vegetation – flat terrain
- Low risk

These vegetation and terrain polygons are overlaid on all the Company's transmission assets. This allows for a wildfire risk forecast, based on the condition of fuels in the forecast period, at a circuit or portion of circuit level. This is an important maturity step as the previously highlighted system impacts matrix only represents the worst-case risk at a district level. Districts traverse a wide variety of terrain and fuels and may experience different weather conditions based on this variability. It would be unnecessarily impactful to customers if all circuits and their associated fuels and terrain were treated uniformly. This approach to forecasting wildfire risk allows for decisions on how to operate the network at a scale that is necessary for the risk without impacting customers outside the risk area with a practice like ESS. Additionally, doing this geospatially in conjunction with an asset database

has allowed for increased efficiency and timing of deploying ESS, and the ability to also disable when risk subsides.

In summary, the Company's Meteorology Department leverages a considerable number of resources to produce its forecast reports, which will include Montana in 2026. These include internal and external data sources and metrics, like the Company's WRF model, fuel dryness and fire spread metrics, the FPI, and publicly available weather trends. The Company recognizes that under certain conditions, wildfires can occur anywhere there is sufficient wildland vegetation that is dry and flammable, even in historically low-risk areas. Therefore, the system impacts forecast covers the Company's entire retail and non-retail service territory. Typically, forecast reports are produced on business days; however, during periods of extreme weather or wildfire risk, a forecast is generated every day, including weekends and holidays. The forecast produced is integral to informing internal stakeholders of necessary actions referenced in other parts of the WMP.

6. System Operations

Adjustments to power system operations can help mitigate wildfire risk. System operations adjustments may include modifying relay settings or changes to line re-energization testing protocols. However, adjustments beneficial to wildfire mitigation are not universally applied to power system operations, because there are certain disadvantages in their use, primarily an increase in outage frequency and duration. In other words, a balance is required to provide reliable power while still mitigating wildfire risk. The Company has a governing policy, PAC-1000 Operating T&D Assets During Periods of Elevated Wildfire Risk, and a number of system operating procedures (SOPs) that support the operational work practices.

6.1 Transmission – Reclosing

PacifiCorp's transmission lines in Montana consist of a bulk electric system. Each transmission line provides a specific function within the delivery of electric service from source to customer. Given most faults on the system are temporary (e.g., debris or lightning), reclosing is used to restore a line after a temporary fault. If the fault is still present during the reclose cycle, the line will remain open (locked out). When wildfire conditions escalate, the Company may disable automatic reclosing or discontinue the use of manual reclosing after an operation or a set number of operations to minimize the potential of an ignition. The Company has used reclosing disabling strategies on transmission lines for many years and has employed more frequent reclose disabling on transmission lines because of the increased wildfire risk. The Company has been able to use these strategies with minimal impact on customer reliability.

6.2 Re-Energization Practices

The Company also modifies re-energization practices based on risk assessments, balancing customer reliability and wildfire mitigation. If a breaker or recloser has "locked out," meaning it has opened and no longer conducts electricity, a system operator or field personnel will test a line if it meets criteria outlined in PAC-1000 and SOP 203 Wildfire Encroachment. To test the line, the system operator or field personnel will close the device, thereby allowing the line to be re-energized. If the fault has cleared, the system will run normally. If the fault is not cleared, the device will lock out again. If the device locks out again, the system operator then knows that additional investigation or work will be required before the line can be successfully re-energized. Because faults are often temporary, line-testing can be an efficient practice to maintain customer reliability, similar to the use of reclosing described above. At the same time, line-testing can potentially result in arcing or an emission of sparks if a fault has not yet cleared when the line is tested. If criteria as outlined in PAC-1000 are met, the line can be tested without patrol. After a line is successfully tested, a mainline patrol is required.

6.3 Additional Patrols

When wildfire risk is elevated, a proactive, targeted patrol may be performed. These patrols target obvious defective equipment and conditions that could lead to increased ignition risk. Targeted patrols allow for expedited correction of any serious conditions. They also provide valuable reports of the situation "on the ground" by subject matter expert field personnel.

Additionally, the Vegetation Management Department may patrol lines, targeting conditions subject to severe weather, especially hazardous trees. As hazardous vegetation is found, it is promptly pruned or removed.

Overall, these additional, responsive patrols aim to enhance the Company's situational awareness of on-the-ground conditions before a weather event and expedited corrections of targeted equipment conditions and hazardous vegetation. These targeted patrols do not replace standard programs (as described in Section 2 above). Instead, they supplement them.

6.4 Wildfire Encroachment

The Company has outlined requirements for emergency de-energization of transmission lines, distribution lines, and/or substation facilities based on approaching wildfires in procedure SOP 203. This procedure outlines the actions to be taken by various departments within the organization when a credible wildfire is within specified proximity of an identified Company asset. Emergency de-energizations aim to minimize additional fire ignitions,

create a safe environment for firefighting activities, and support the safety of potentially impacted communities.

6.5 Field Operations and Work Practices

During fire season, the Company modifies wires operations and work practices to further mitigate wildfire risk. Additionally, the Company invests in tools and equipment to mitigate wildfire risk.

Modified Work Practices

The daily forecasts produced by the Meteorology Department indicate the local weather and geographic fire risk conditions. This forecast informs modified work practices targeted to reduce the potential of direct or indirect causes of ignition during planned work activities, fault response, and outage restoration.

Personnel working in the field during fire season mitigate wildfire risk through a variety of tactics. Routine work, such as condition correction and outage response, poses some degree of ignition risk, and, in certain circumstances, crews modify their work practices and equipment to decrease this risk. In the extremely unlikely event that a fire ignition occurs while field crews or other Company personnel are working in the field (collectively "field personnel"), such field personnel are equipped with basic tools to extinguish small fires.

Figure 6-1: Line Workers Performing Field Work

Some wildfire risk can be mitigated by managing the way field work is scheduled and performed. To effectively manage work during fire season, area managers regularly review local fire conditions and the weather forecasts provided to them as part of situational awareness, as discussed in Section 5 of this document. During fire season, operations managers are encouraged to defer any nonessential work at locations with dense and dry wildland vegetation, especially during periods of heightened fire weather conditions. If

essential work needs to be performed in areas with appreciable wildfire risk, certain restrictions may apply, including:

- **Hot Work Restrictions:** Evaluating whether field personnel should perform work during a planned interruption, rather than while a line is energized.
- **Time of Day Restrictions:** Considering using alternate working hours to accommodate evening and night work when there may be less risk of ignition.
- **Wind Restrictions:** Re-evaluating whether work may be deferred when windy conditions at a particular work site are observed.
- **Driving Restrictions:** Keeping vehicles on designated roads whenever operationally feasible.
- **Worksite Preparation:** Removing wildland vegetation that poses an ignition risk from a worksite if the work to be performed involves the potential emission of sparks from electrical equipment and only where it is allowed in accordance with land management/agency permit requirements. In addition to clearing work, water truck resources, discussed below, are strategically assigned to accompany field personnel working in wildland areas during fire season. Depending on local conditions, dry vegetation in the immediate vicinity may be sprayed with water before conducting work as a preventive measure.

As noted above, whether to implement these restrictions is evaluated based on the daily reports and briefings provided by the Meteorology Department. As the Company is continuously improving and evolving its plan and programs, the process below is subject to change and is managed by internal Company policies and procedures.

In general, whenever wildfire risk potential is minimal to none, work may be conducted using normal operating practices. However, when the Meteorology Department forecasts elevated, significant, or extreme wildfire risk conditions, local operations may modify operating practices. For example, the personal protective equipment and basic firefighting tools described in the basic personal suppression equipment section below are required for any field work conducted during periods of elevated fire risk. Local area management will also evaluate, after considering multiple factors regarding the local circumstances of a particular circuit, whether any hot work modifications should be made. If wildfire risk is significant or extreme, local area management will also consider whether any additional work is appropriate.

The Company also follows local United States Forest Service work practice requirements, as outlined in their Industrial Fire Precaution Levels.[3] These are issued as forest orders and change depending on the time of year and the forest.

Other entities or agencies that may require permitting or have restrictions include Tribal Employment Rights Ordinance, USDA Forest Service, US Department of Interior, Bureau of Reclamation, as well as State of Montana public lands. Any federal, state or local permitting requirements and restrictions are addressed under the applicable permitting processes and/or are coordinated with the appropriate governing body.

Active Wildfire Response

The Company monitors and may support the response to active wildfires in or near assets and service territory. While employees may carry small fire suppression equipment, they are not professionally trained firefighters; therefore, when they encounter a fire of any appreciable magnitude, they are instructed to call 911. For known active wildfires, the Company will monitor the situation and may contact the appropriate incident management team to support efforts needed, which can include de-energization of lines.

Equipment and Tool Purchases

In addition to changes in work practices, the Company invests in tools and equipment to mitigate wildfire risk. These investments include (1) mobile communication devices, (2) vehicles, (3) personal suppression equipment, and (4) water trucks or trailers.

Mobile Communication Devices

The Company serves customers in very rural locations, some of which have limited to no cellular connectivity to the local district office and/or the control center. During large disasters, such as wildfire events, field personnel need to be able to communicate quickly and effectively to maintain safe operation of the system and support emergency response and restoration activities. Starlink devices are deployed to help mitigate wildfire risk in locations where there is no cellular coverage. The Starlink devices provide a Wi-Fi hot spot connection to allow communication with the local district office and the control center. Overall, the communication equipment will improve emergency restoration activities and mitigate impacts to customers.

Vehicles

Vehicles can be a source of ignition. As discussed above, operations personnel are instructed to stay on designated roads during fire season, as feasible, and to avoid

[3] United States Forest Service. Industrial Fire Precaution Levels. Sourced Dec. 11, 2025.

vegetation that could contact the undercarriage of parked vehicle. To further mitigate any wildfire risk associated with the use of vehicles, the Company plans to convert, over time, the vehicle exhaust configuration of work trucks. Long term, when new vehicles are purchased, the plan is to purchase trucks with a vehicle exhaust configuration that minimizes ignition risk.

Basic Personal Suppression Equipment

Personal safety is the Company's priority, and field personnel are encouraged to evacuate and call 911 if necessary. Field personnel working in fire risk areas maintain the capability to extinguish a small fire that may ignite while working in the field. Field personnel should attempt suppression only if the fire is small enough so that one person can effectively suppress the fire while maintaining their personal safety. All field personnel working in the FHCA during heightened fire risk season have basic suppression equipment available onsite, because field utility trucks typically carry the following equipment: (1) fire extinguisher, (2) shovel, (3) Pulaski, (4) water container, and (5) dust mask. The water container should hold at least five gallons and may be a pressurized container or a backpack with a manual pump (or other).

Water Trailer Resources

PacifiCorp has water trucks or trailers that field operations use to mitigate against wildfire risk. These resources are not dispatched to reported fires. Instead, resources are strategically assigned to accompany field personnel if conditions warrant. For example, if it is necessary to perform work during a period in which there is a Red Flag Warning, field operations may schedule a water trailer to join field personnel working in the field. As discussed above, the water trailer can be used to help prep the site for work. By watering down dry vegetation in the work area, the chance of an ignition may be minimized. In the unlikely event that there was an ignition, the water trailer could be used to assist in the suppression of a small fire.

Wildfire Training

Wildfire mitigation programs include installing modern technologies such as covered conductors, advanced detection devices, and weather stations, all of which require training for proper installation and maintenance work. To accommodate this additional training, the Company built a comprehensive wildfire transmission and distribution training center in 2020. The training center has space to test equipment and conduct analyses and includes a pole yard, a vital component of operations where personnel can get firsthand training and practice installing equipment such as covered conductor before going out to the field.

Wildfire Training Material

To prepare crews for ever-changing wildfire conditions, the Company is developing training materials that will include eBooks and mobile applications available for internal employees. The goal in developing the training materials is to prepare and train crews before an event happens to decrease response time and aid in response effectiveness. Training topics include wildfire protection overview, roles and responsibilities, and PSPS. The application will also include interactive scenarios for crews to walk through to help inform and guide actions should an incident occur.

Public Safety Power Shutoff (PSPS) Event

PacifiCorp may temporarily de-energize power lines during periods of wildfire risk to reduce the risk of ignition and minimize impacts to public safety. This practice is commonly referred to as a public safety power shutoff (PSPS) event. Any PSPS event in the state of Montana would only apply to the transmission assets that PacifiCorp operates in the state. All PSPS events will be planned and executed as identified in PacifiCorp's wildfire policies (PAC-1000). Because PacifiCorp does not serve retail load in the state, the coordination activities identified in these wildfire policies occur with our interconnected utility partners, not directly with customers; however, timelines for coordination and communication would remain consistent.

7. Wildfire Safety and Preparedness Engagement Strategy

PacifiCorp employs a multifaceted approach to support community engagement and outreach with the goal of providing clear, actionable, and timely information to customers, community stakeholders and regulators. The wildfire safety and preparedness community engagement plan will continue to evolve year-over-year as customer and stakeholder feedback and guidance are incorporated. PacifiCorp maintains a flexible awareness and engagement strategy that allows for dynamic tactics, informed by community stakeholder input and community needs. In accordance with this plan, the Company held a public meeting in December 2025 and posted the plan for a period of public comment. PacifiCorp does not engage in regular customer outreach or public communications in Montana due to its limited assets footprint and no retail customers The Company does engage in pre-season, during season, and post-season coordination with interconnected utilities. While the Company's Montana assets can generally be de-energized without affecting interconnected utility retail service, the coordination with interconnected utilities is foundational in ensuring community notifications in a low likelihood scenario where PacifiCorp's wildfire mitigation activities do result in retail customer impacts.

Appendix A – ADHERENCE TO REQUIREMENTS

Code	Legislative Requirement	Compliance
HB 490, § 2(2)(a)	A wildfire mitigation plan must include a description of: (a) areas in which the electric facilities provider has electric facilities or electric transmission and distribution activities that may be subject to a heightened risk of wildfire;	Section: Introduction Section 1: Asset Risk and FHCA Mapping
HB 490 § 2(2)(b)	(b) The strategies and programs that the electric facilities provider will use to inspect, maintain, repair, and operate its electric facilities;	Section 2: Inspection and Correction
HB 490 § 2(2)(c)	(c) the strategies and programs that the electric facilities provider will use to perform vegetation management;	Section 3: Vegetation Management
HB 490 § 2(2)(d)	(d) the strategies for modifications or upgrades to electric facilities and preventative programs that the electric facilities provider will employ to reduce the risk of its electric facilities igniting a wildfire;	Section 1: Asset Risk and FHCA Mapping Section 4: System Strengthening
HB 490 § 2(2)(e)	(e) the strategies and methods for de-energizing power lines and modifying electric facility operations to mitigate potential wildfires taking into consideration the ability of the electric facilities provider to reasonably access the proposed electric facility to be de-energized, the balance of the risk of wildfire with the need for continued supply of electricity to a community, and any potential impact to public safety, first responders, and health and communications infrastructure;	Section 5: Situational Awareness Section 6: System Operations
HB 490 § 2(2)(f)	(f) the methods the electric facilities provider intends to use to restore its electrical system in the event systems are de-energized for the prevention of a wildfire;	Section 6: System Operations
HB 490 § 2(2)(g)	(g) the estimated incremental costs associated with implementing the plan, including system improvements and upgrades for a regulated utility;	Section: Introduction Section 4: System Strengthening
HB 490 § 2(2)(h)	(h) community outreach and public awareness efforts before and during a wildfire season;	Section 7: Wildfire Safety and Preparedness Engagement Strategy

Code	Legislative Requirement	Compliance
HB 490 § 2(2)(i)	(i) potential participation, if applicable, with state or local wildland fire protection plans or wildfire mitigation plans.	Section 1: Asset Risk and FHCA Mapping Section 5: Situational Awareness Section 6: System Operations
HB 490 § 4	the approval authority for an electric facilities provider's wildfire mitigation plan shall: (a) initially review an electric facilities provider's wildfire mitigation plan; (b) consider any input from a federal, tribal, state, or local entity, or other interested persons during a public comment period not to exceed 45 days; and (c) after a public meeting and no more than 60 days after the close of public comment: (i) approve the wildfire mitigation plan or identify any deficiencies in the plan; and (ii) provide required modifications in writing with the opportunity for the electric facilities provider to correct the deficiencies and resubmit the plan for approval.	Appendix B; Appendix C
HB 490 § 6	The approval authority shall approve the wildfire mitigation plan if the approval authority determines the wildfire mitigation plan contains the required components in subsection (2), is in the public interest, and reasonably balances the incremental costs of implementing the plan with the risk of a potential wildfire.	Appendix C

Appendix B – Public Comment Summary

Public Comment Summary – Montana Wildfire Mitigation Plan

Public Notice Issued: December 16, 2025

Public Comment Period: December 16–28, 2025

Public Meeting: December 29, 2025 – Hardin, Montana

Overview

Pursuant to Mont. Code Ann. § 69-2-302(4), PacifiCorp invited all members of the public to review and provide feedback on the draft Montana Wildfire Mitigation Plan, which outlines the Company's approach to reducing the risk of its electric system causing or contributing to wildfires. The draft plan was initially reviewed and then made available for public comment from December 16 through December 28, 2025, providing an opportunity for federal, tribal, state, local entities, and other interested persons to submit input within the required 45-day limit. A public meeting was held in Hardin, Montana, on December 29, 2025, to present the plan, answer questions, and gather additional feedback.

Opportunities for Public Comment

During the comment period, PacifiCorp provided multiple avenues for public engagement, including:

- **Online Access:** The draft Montana Wildfire Mitigation Plan was made available for public review on December 16, 2025.
- **Email Submission:** Written comments were welcomed could be submitted to WildfireSafety@PacifiCorp.com through 11:59 p.m. MT on December 28, 2025.
- **Public Meeting:**
  Family Engagement Center, 636 West 5th Street, Hardin, Montana
  December 29, 2025, 5:30–7:30 p.m.
  The meeting provided an opportunity for community members to provide input. No one was in attendance.

Public Comments Received

No public comments were received during the comment period or at the public meeting. Following the close of the comment period and consistent with the requirement to act within 60 days, the approval authority will proceed to approve the plan or identify any deficiencies and, if necessary, provide written modifications with an opportunity for PacifiCorp to correct and resubmit the plan.

Appendix C – Approval Authority Resolution And Approval

UNANIMOUS WRITTEN CONSENT

OF THE BOARD OF DIRECTORS

OF PACIFICORP

Resolution No. 2025-005

Pursuant to ORS §60.341, the undersigned, constituting all of the current directors (the "***Board***") of PacifiCorp, an Oregon corporation (the "***Company***"), hereby adopt and consent to the following resolutions as of December __, 2025:

I. *Approval of Montana Wildfire Mitigation Plan*

WHEREAS, the Company has prepared a Wildfire Mitigation Plan for the state of Montana (the "***Plan***"), attached as **Exhibit A**, which is required under Montana statute due to the Company's ownership and operation of transmission and generation assets in Montana;

WHEREAS, the Board has reviewed the Plan and determined that it contains all components required under subsection Mont. Code Ann. 69-2-302(2), serves the public interest, and reasonably balances the incremental costs of implementation with the risk of potential wildfire;

WHEREAS, the Board has complied with all requirements of subsection Mont. Code Ann. 69-2-302(4) by initially reviewing PacifiCorp's draft Plan, providing a public comment period from December 16 through December 28, 2025, considering input from federal, tribal, state, and local entities as well as other interested persons, conducting a public meeting in Hardin, Montana on December 29, 2025, and, following the close of the comment period during which no public comments were received, proceeding within the required timeframe to approve the plan after identifying no deficiencies or necessary modifications;

NOW, THEREFORE, BE IT RESOLVED, the Board has determined that it is advisable, fair to and in the best interests of the Company and its shareholders to approve and adopt the Plan.

RESOLVED FURTHER, that the Plan, together with such changes as may be approved by any officer of the Company (each, an "***Authorized Officer***" and collectively, the "***Authorized Officers***"), is approved.

II. *General Authorization*

RESOLVED, that the Authorized Officers, acting individually or together with another or others, be, and hereby are, authorized, empowered and directed, in the name and on behalf of the Company, to make all such arrangements, to take all such further action, to cause to be prepared and filed any documents, to make all expenditures and incur all expenses and to execute and deliver, in the name of and on behalf of the Company, any agreements, instruments, certificates and documents (including without limitation officers' certificates) as they may deem necessary, appropriate or advisable in order to fully effectuate the purpose of each and all of the foregoing resolutions, and the execution by such Authorized Officers of any such agreement, instrument, document or certificate or the payment of any such expenditures or expenses or the doing by them of any act in connection with the foregoing matters shall conclusively establish their authority therefor from the Company and the approval and ratification by the Company of the agreement, instrument, document or certificate so executed, the expenses or expenditures so paid and the action so taken; and be it further

RESOLVED, that any and all actions heretofore taken by the Authorized Officers in connection with the matters contemplated by the foregoing resolutions, including without limitation the actions and matters authorized herein and all related documents, instruments and agreements, be, and hereby are, approved, confirmed and ratified in all respects.

[Signature page follows]