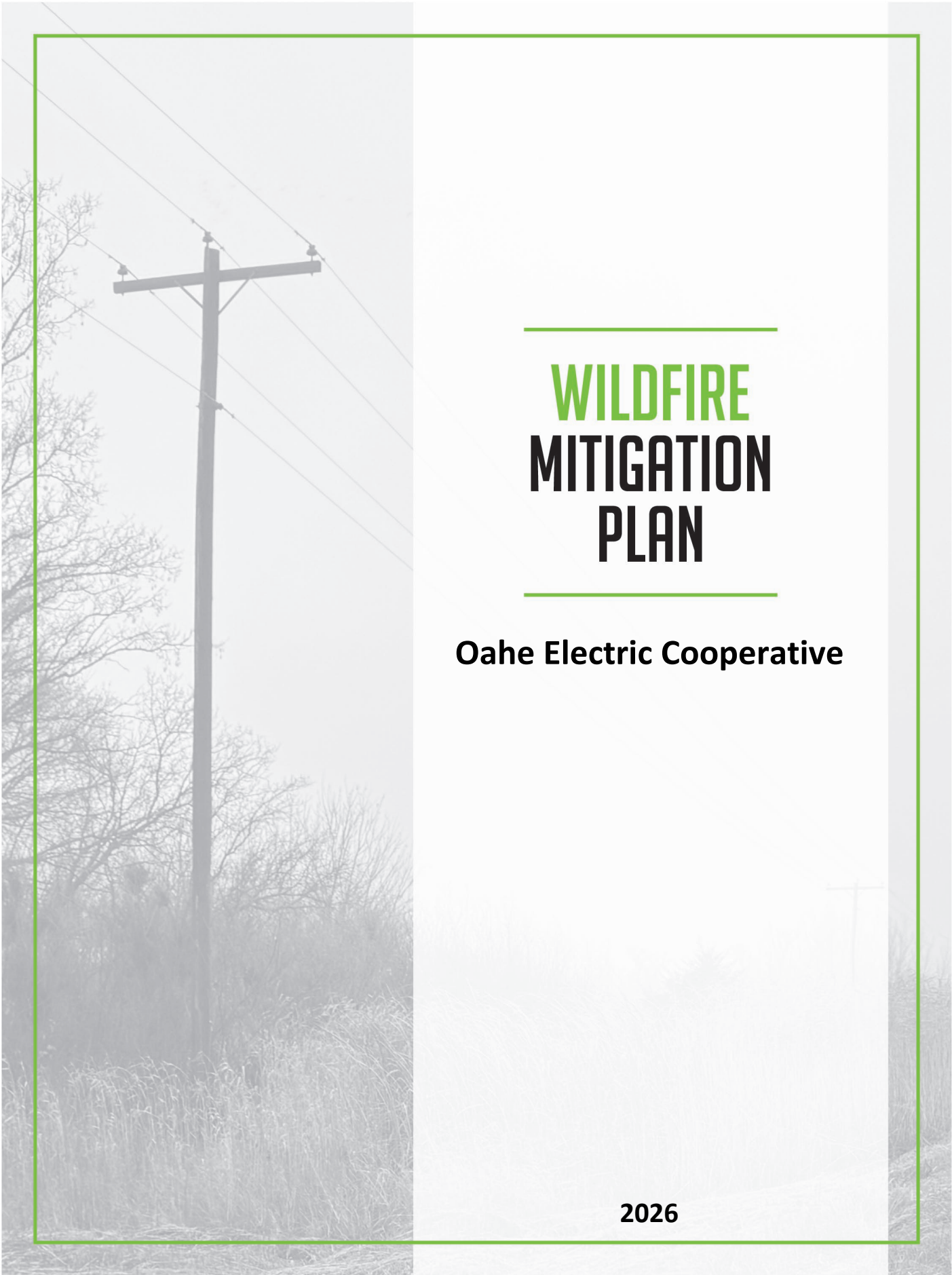


The background of the cover is a grayscale photograph of a utility pole with multiple cross-arms and wires, set against a backdrop of dry, brushy vegetation. The image is partially obscured by a white rectangular area on the right side, which contains the title and organization name. A thin green border frames the entire page.

WILDFIRE MITIGATION PLAN

Oahe Electric Cooperative

2026

Wildfire Mitigation Plan For Oahe Electric Cooperative Blunt, SD

2026

Respectfully Submitted,

STAR ENERGY SERVICES LLC

Prepared by Kristi Robinson, PE



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Version	Date
1.0	September 15, 2026

SECTION 1 INTRODUCTION

1.1 Objectives

The primary objective of Oahe Electric Cooperative (Oahe Electric's) Wildfire Mitigation Plan is to protect the safety and well-being of its members and the broader community by proactively assessing wildfire risks, implementing effective mitigation strategies, and maintaining rigorous condition monitoring of cooperative infrastructure. By fostering clear and responsive communication, the Cooperative seeks to strengthen collaboration with the community, enhancing preparedness and response efforts to reduce the threat of wildfires.

To better understand the rising wildfire risks, Oahe Electric conducted an evaluation of their service territory. Using datasets created by the USDA Forest Service in collaboration with other agencies, the likelihood of wildfires across the service territory was assessed. A summary of the results is shown in Table 1.

Table 1 – Asset Exposure to Elevated Fire Risk

Asset Type	Total	Elevated Fire Risk*	% of Total
Primary Overhead Conductor	1,001.44 mi	1,001.25 mi	99.98%
Primary Underground Conductor	281.33 mi	278.26 mi	98.91%
Poles	19,407	19,401	99.97%

*Assets located in census tract classified as Relatively Moderate to Very High by FEMA NRI

1.2 Service Area

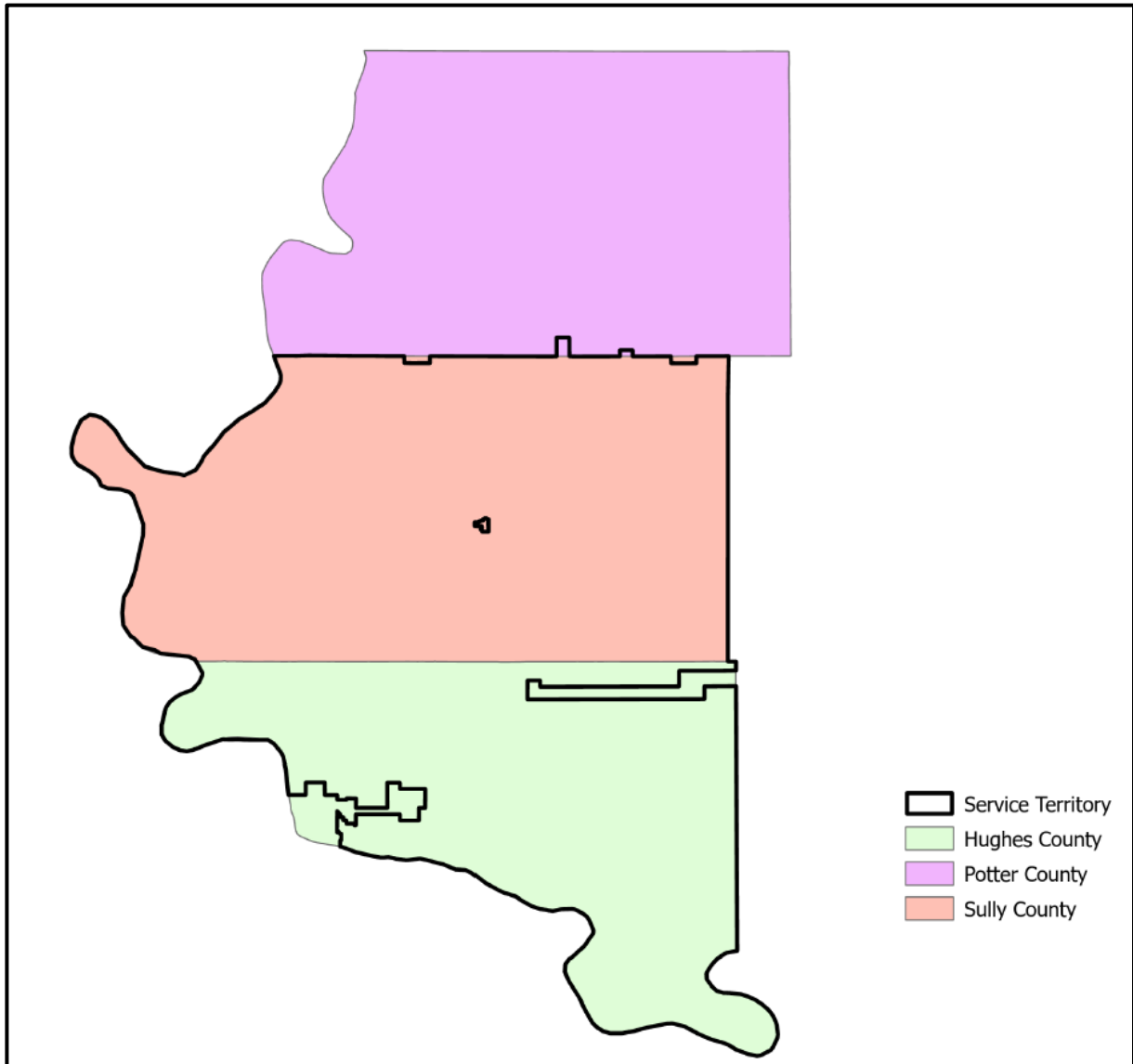
Oahe Electric is a distribution cooperative that serves the rural areas in Hughes and Sully counties in South Dakota. Oahe Electric also provides wholesale electrical service to the community of Onida. With headquarters in Blunt, South Dakota, Oahe Electric currently serves 2,200 members, mostly located in rural residential areas.

Oahe Electric's service area includes a rural water system pumping and treatment plants, a grain elevator, plus several large irrigation pump sites along the Missouri River and agriculture services. Oahe Electric's wildfire mitigation efforts focus on maintaining vegetation around power lines, monitoring system conditions, and implementing proactive measures to address areas with elevated risk. By virtue of publishing this plan, the Cooperative seeks to ensure its members are aware of the Cooperative's coordinated response in the event of a wildfire.

1.3 Duration of the Wildfire Mitigation Plan

Oahe Electric's 2026 Wildfire Mitigation Plan marks the organization's first formal, comprehensive plan. Oahe Electric has already implemented many of the measures now outlined in the Wildfire Mitigation Plan to enhance the safety and reliability of its distribution system. The plan is scheduled for review and potential revision every two years.

Figure 1 – Service Territory Map



SECTION 2 ASSESSMENT OF RISKS

2.1 Risk Factors

Proactive management, maintenance, and modernization of infrastructure in fire-prone areas are essential to reducing ignition risks and enhancing system resilience. Effectively addressing these interconnected challenges requires comprehensive, forward-looking strategies that incorporate climate adaptation, infrastructure investment, and improved land-use planning. These efforts are critical to mitigating the growing impacts of wildfires on communities and the environment.

2.1.1 Infrastructure

As electrical systems age, components such as power lines, transformers, and poles can degrade, increasing the risk of equipment failure that may lead to ignition. Deteriorating conductors, corroded hardware, and damaged poles can cause issues such as line sagging or breakage, particularly during high wind events, potentially igniting nearby vegetation.

Mitigating these risks requires significant investment in infrastructure modernization. Grid upgrades often include the replacement of outdated equipment with more resilient technologies designed to withstand extreme weather and reduce the likelihood of ignition. Examples include insulated conductors, undergrounding of power lines, and the implementation of advanced monitoring and fault detection systems.

Despite these challenges, Oahe Electric remains committed to reducing wildfire risk while ensuring the reliability of its electric service. The Cooperative continues to evaluate the condition of its infrastructure and engages in long-term planning for system upgrades that balances safety, reliability, and financial feasibility.

2.1.2 Population Growth and Wildland-Urban Interface

Over the past decade, Oahe Electric's service territory has had steady population growth. Oahe Electric remains a growing utility, which also presents emerging challenges, particularly in regions where population expansion overlaps with WUI zones.

The WUI refers to areas where human development borders or intermingles with natural landscapes such as forests, grasslands, and agricultural lands. These zones present elevated wildfire risks, as they combine flammable vegetation with the infrastructure and population density of urban or suburban environments. According to the Federal Emergency Management Agency (FEMA), the WUI continues to expand nationwide, driven by increasing residential and commercial development in wildfire-prone areas.

Within Oahe Electric's service territory exist Cooperative members who reside within Intermixed or Interfaced WUI zones. Nationally, nearly 99 million people live in WUI zones, underscoring the scale of this growing trend. This emphasizes the need for targeted mitigation strategies and public awareness to ensure that growth in these areas is both safe and sustainable. Additional

information specific to Oahe Electric’s service territory and WUI zones are discussed in Section 2.2.3.

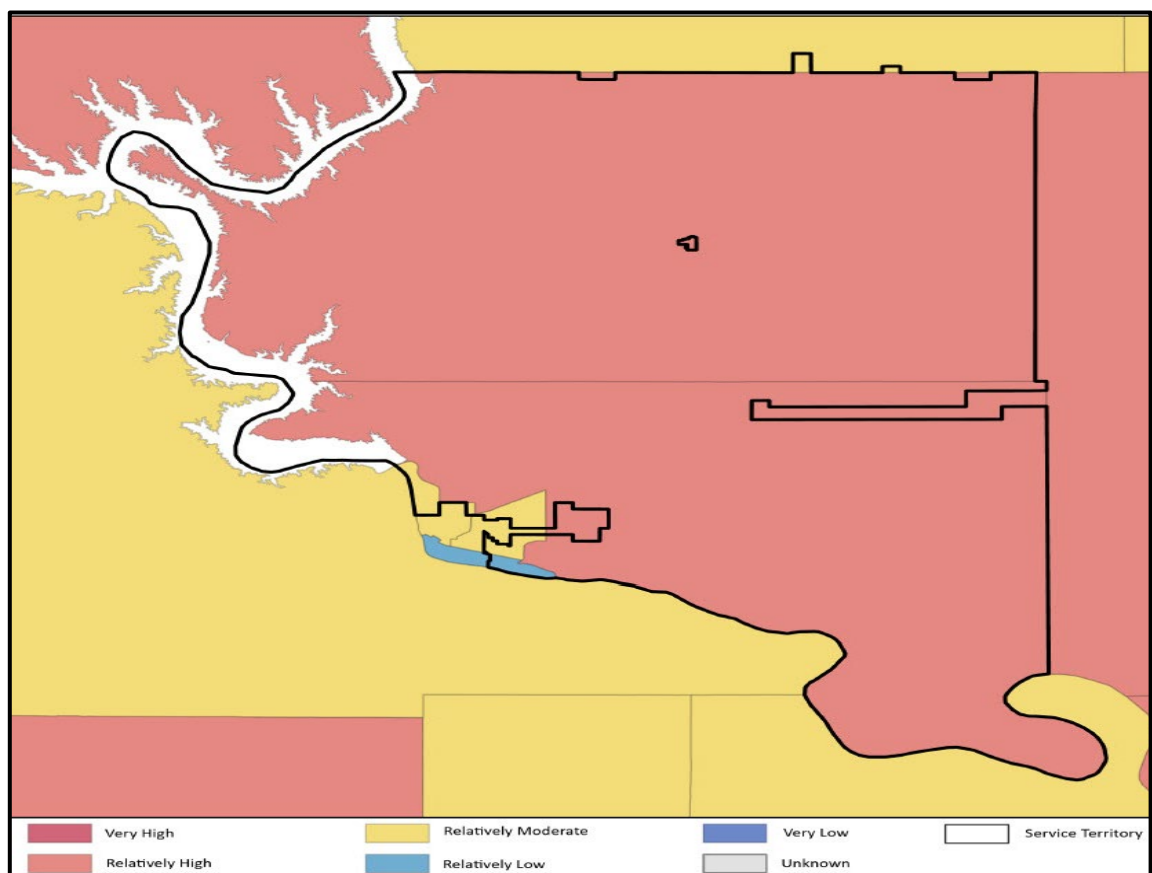
2.2 Wildfire Risk Assessment

Conducting a comprehensive wildfire risk assessment is a critical step in understanding and mitigating potential threats to Oahe Electric’s service territory. By evaluating the factors that contribute to wildfire risks, such as environmental conditions, infrastructure vulnerabilities, and population growth in WUI areas, Oahe Electric can implement targeted strategies to protect its members, employees and assets. Multiple public sources can be used to assess the wildfire risk.

2.2.1 FEMA National Risk Index

The FEMA National Risk Index for Wildfire is a widely recognized resource for assessing wildfire risk across the United States. Introduced in 2020, FEMA’s National Risk Index provides a standardized framework for evaluating the relative risk of various natural hazards, including wildfires, at a national scale. Figure 2 presents FEMA’s wildfire risk classification by census tract within Oahe Electric’s service territory. As shown, wildfire risk levels within the territory are relatively high.

Figure 2 – FEMA National Risk Index for Wildfire



Source: <https://hazards.fema.gov/nri/map>

By overlaying Oahe Electric’s distribution assets with the FEMA Wildfire Risk map, it is possible to identify what type of distribution assets are in the different risk zones. Within Oahe Electric’s service territory, nearly all of its infrastructure is located in census tracts classified as having relatively high to very high wildfire risk.

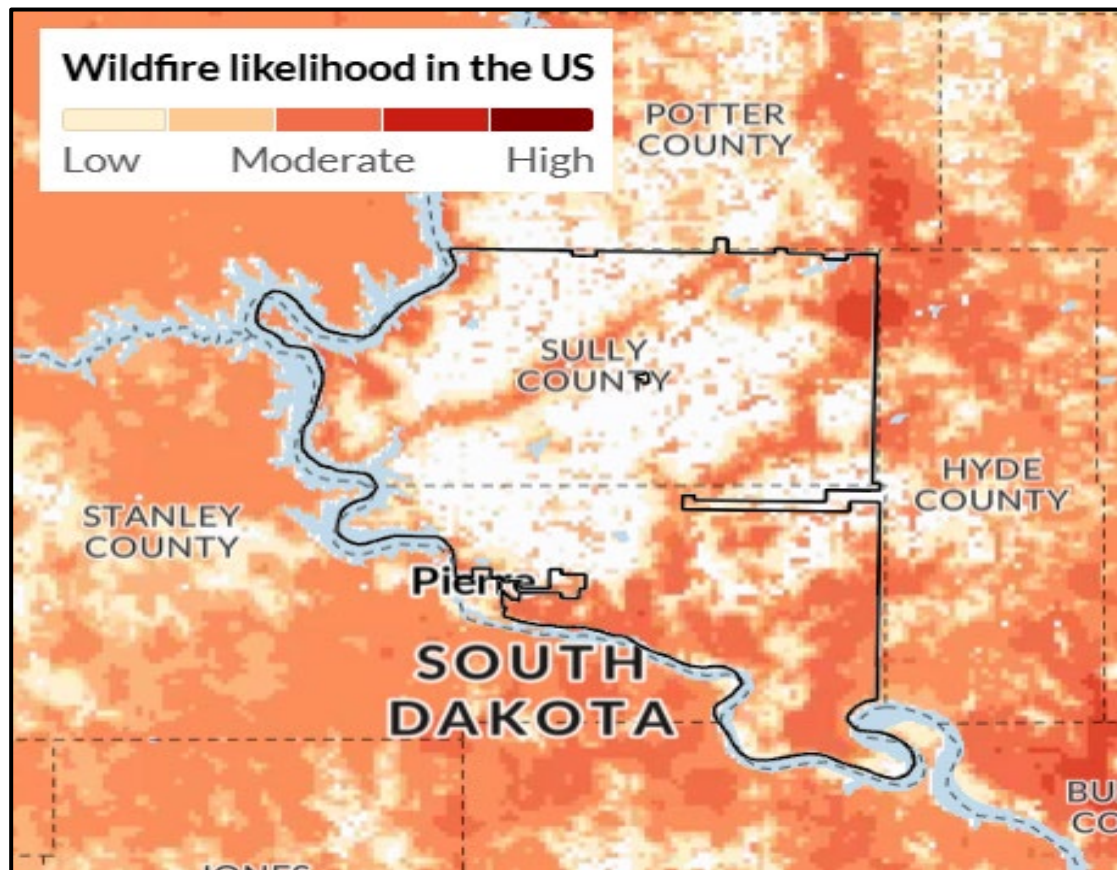
Table 2 – FEMA National Risk Index for Wildfire & Distribution Assets

Asset Type		Relatively High to Very High	Relatively Moderate	Very Low to Relatively Low
Primary Overhead Conductor	Miles	980.15	21.11	0.19
	%	97.87%	2.11%	0.02%
Primary Underground Conductor	Miles	251.48	26.78	3.07
	%	89.39%	9.52%	1.09%
Poles	#	19,001	400	6
	%	97.91%	2.06%	0.03%

2.2.2 USDA Forest Service Wildfire Likelihood

Another valuable public resource is USDA’s Wildfire Risk to Communities, a website developed by the USDA Forest Service in partnership with other federal agencies. It provides interactive maps, charts, and tools designed to help communities understand, assess, and mitigate wildfire risk. Figure 3, sourced from this platform, illustrates the likelihood of wildfire occurrence within the counties served by Oahe Electric. According to the data, wildfire risk in these areas is generally classified as low to moderate.

Figure 3 – USDA Wildfire Likelihood



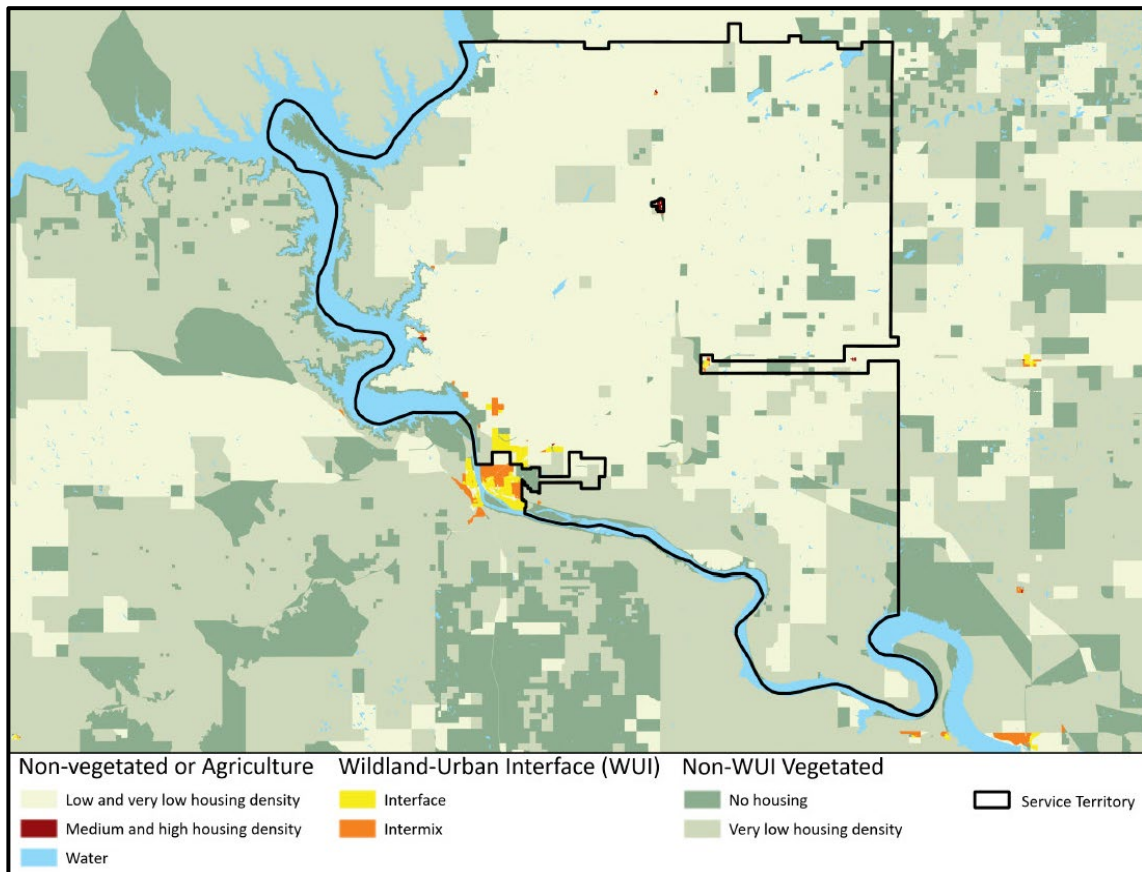
Source: www.wildfirerisk.org

2.2.3 U.S. Fire Administration WUI Fire Community Awareness Maps

The U.S. Fire Administration's WUI Fire Community Awareness Explorer serves as a valuable tool for enhancing public understanding of WUI zones and the associated wildfire risks. These maps visually depict areas where human development overlaps with wildland vegetation, highlighting varying levels of fire hazard exposure. Figure 4 identifies the WUI within Oahe Electric's service territory. This map identifies the majority of the landscape with the Cooperative's service territory classified as having "low" to "very low" housing density, with some scattered areas of medium and high housing density, as well as regions designated as Intermix WUI.

Intermix WUI describes an area within the WUI where human development (buildings) is scattered and intermingled with wildland vegetation, with a relatively lower density of structures but a high percentage of wildland cover. Unlike Interface WUI, which features dense development adjacent to large wildland areas, Intermix WUI is characterized by structures surrounded by or dispersed within natural vegetation.

Figure 4 – WUI Service Territory Map



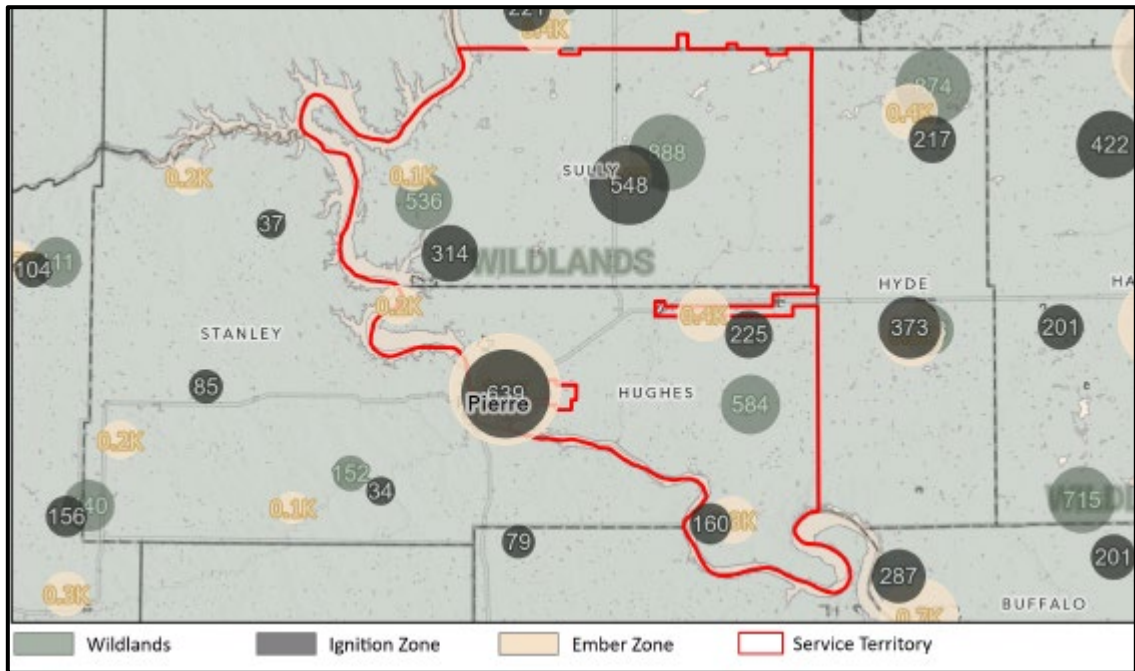
Source: U.S. Fire Administration WUI Fire Community Awareness Explorer

Included with the U.S. Fire Administration’s WUI Fire Community Awareness Explorer is a WUI Structural Assessment. As depicted in Figure 5, the WUI Structural Assessment map indicates that the majority of structures are located within the wildlands zone, which is defined as undeveloped areas primarily covered by natural vegetation. These zones carry elevated wildfire risk due to the abundance of combustible fuels.

Ember zone, which surrounds active wildfire areas and is vulnerable to wind-driven embers, exists inside of Oahe Electric’s service territory. These embers can travel significant distances, ignite structures or vegetation, and contribute to the spread of secondary fires.

Figure 5 – WUI Structural Assessment

Source: U.S. Fire Administration WUI Fire Community Awareness Explorer



SECTION 3 PREVENTION STRATEGIES

Effective wildfire prevention strategies are essential for utilities to minimize the risk of fire ignition and enhance system resilience. Key approaches include vegetation management, thorough inspections of overhead and underground infrastructure, and system hardening measures.

3.1 Vegetation Management

Effective vegetation management is a foundational component of Oahe Electric’s wildfire prevention strategy. The core objectives of this program are to maintain clear rights-of-way (ROW) of hazardous vegetation and ensure compliance with applicable safety regulations, thereby supporting system reliability and public safety.

The primary purpose of vegetation management is to establish and maintain a safe and reliable utility corridor by mitigating potential fire hazards, including overgrowth within the ROW. ROW maintenance involves trimming or removing vegetation that poses a risk. When operating on non-Oahe Electric owned property, the Cooperative adheres to established protocols to obtain necessary permissions and permitting, emphasizing the need to remove vegetation for safety and wildfire mitigation. All vegetation management activities are documented to ensure compliance and to demonstrate proactive risk reduction efforts.

Oahe Electric follows a four-year vegetation management cycle. High-risk areas, such as those with dense vegetation or a history of vegetation-related outages, are inspected and maintained more frequently as requested by consumers or as observed in day-to-day work. These practices are aligned with the National Electrical Safety Code (NESC) and recognized utility best practices, ensuring adherence to industry standards.

Through its proactive vegetation management program, Oahe Electric demonstrates a strong commitment to protecting its infrastructure, members, and service territory from the increasing threat of wildfires, while maintaining a safe and reliable electric distribution system.

3.2 Inspections

Oahe Electric conducts a variety of inspections to monitor infrastructure and identify wildfire risks. These include pole and equipment inspections to check for wear, damage, or structural integrity, as well as vegetation inspections to ensure ROWs remain clear of hazardous growth.

Early detection of these issues allows for timely mitigation. Using GIS technology, Oahe Electric tracks inspection data, mapping out risk areas and inspection histories for each section of the system. This enables more effective planning and prioritization of maintenance activities.

This inspection plan serves as a recommended framework for monitoring infrastructure and mitigating wildfire risks; however, it remains subject to change based on various factors. Adjustments may be necessary due to evolving environmental conditions, regulatory requirements, resource availability, or emerging threats. Additionally, unforeseen events such as severe weather, wildfires,

or access restrictions may impact inspection schedules and priorities. Oahe Electric plans to remain flexible in adapting its approach to ensure that inspections and maintenance efforts continue to effectively enhance system safety and reliability.

3.2.1 Pole Inspections

Oahe Electric conducts regular pole inspections on a ten-year cycle to maintain the integrity and reliability of its distribution system. During these inspections, poles are assessed through a comprehensive process. Inspectors conduct visual checks to identify visible issues such as woodpecker holes, cracks, leaning poles, or rotting. The ground surrounding each pole is inspected for erosion or soil displacement that could compromise stability. To detect internal decay, inspectors perform “sounding” by tapping the pole with a hammer to identify hollow areas and drill at ground level to assess for hidden rot. Boring may be completed to determine if there are any internal voids in the pole.

Poles that are identified as needing replacement are prioritized to be replaced within the next twelve months. Poles identified to have a potential of imminent failure, also known as danger poles, are scheduled for replacement within two weeks of discovery or as soon as otherwise practicable.

3.2.2 Hardware Inspections

Oahe Electric performs hardware inspections on a continuing basis over a ten-year cycle for a full review of all overhead lines and the Cooperative-owned equipment located in substations. Inspections focus on identifying and addressing potential issues with key components, including cutouts, insulators, crossarms, guying attachments, conductors, connectors, and switches. Oahe Electric’s line crew looks for corrosion, loose hardware and signs of wear and tear, overheating, and damage caused by environmental factors or wildlife. This structured approach ensures timely maintenance, reducing risks of equipment failure and mitigating wildfire hazards.

3.2.3 Underground/Enclosure Inspections

Oahe Electric conducts inspections of underground and pad-mount enclosure equipment on a continuing basis over a ten-year cycle. Inspections include both exterior and interior assessments to ensure the safety, reliability, and accessibility of equipment.

Exterior inspections focus on identifying issues such as ground erosion or disturbances around the equipment, excessive rust, or visible damage to the enclosure. Accessibility is verified to ensure the equipment can be accessed quickly in emergencies.

Interior inspections involve checking that all components, such as elbows, are properly seated and that there are no visible oil spots, displaced ground rods or damage to the ground loop. Inspectors ensure all required warning signs and stickers are present and legible.

3.3 Additional Efforts

In addition to its comprehensive vegetation management and inspection programs, Oahe Electric is implementing a series of system hardening initiatives aimed at reducing wildfire risk, enhancing infrastructure resilience, and improving operational efficiency. These efforts are a key component of the Cooperative's broader wildfire mitigation strategy.

A primary focus is the strategic conversion of overhead distribution lines to underground installations. Undergrounding significantly reduces exposure to weather-related damage, falling vegetation, and wildfire ignition risks. Today, approximately 80% of new distribution line is installed with underground construction. In areas where underground construction is not practical or cost-effective, Oahe Electric prioritizes overhead line clearance, ensuring adequate distance between energized conductors and surrounding vegetation or other combustible materials.

To further mitigate ignition hazards, Oahe Electric is phasing out oil-filled hydraulic reclosers and replacing them with vacuum-based reclosers and modern electronic line devices, such as single-phase electronic reclosers and VFIs. Additionally, the Cooperative utilized dead front pad-mount switchgear with underground construction. These advanced technologies operate without expelling oil, vapor, or sparks, making them better suited for deployment in fire-prone environments.

It is anticipated that the incremental cost(s) for implementation of this plan shall amount up to 1% of Oahe's net utility plan overall spend.

SECTION 4 CONDITION MONITORING

Monitoring fire weather conditions and remaining vigilant to official warnings is a critical component of Oahe Electric’s wildfire mitigation strategy. The Cooperatives subscribes to fire weather alerts, such as Red Flag Warnings issued by the National Weather Service - Aberdeen office, which can signal elevated fire danger due to a combination of environmental factors, including high winds, low humidity, and dry vegetation. Awareness of these conditions enables Oahe to implement proactive safety measures, adjust field operations, and maintain clear and timely communication with employees and Cooperative members.

The Cooperative is also notified from East River about fire weather conditions using authoritative sources such as the National Weather Service (NWS), the Storm Prediction Center, and state-level emergency management systems.

Figure 6 – East River Grassland Fire Danger Index

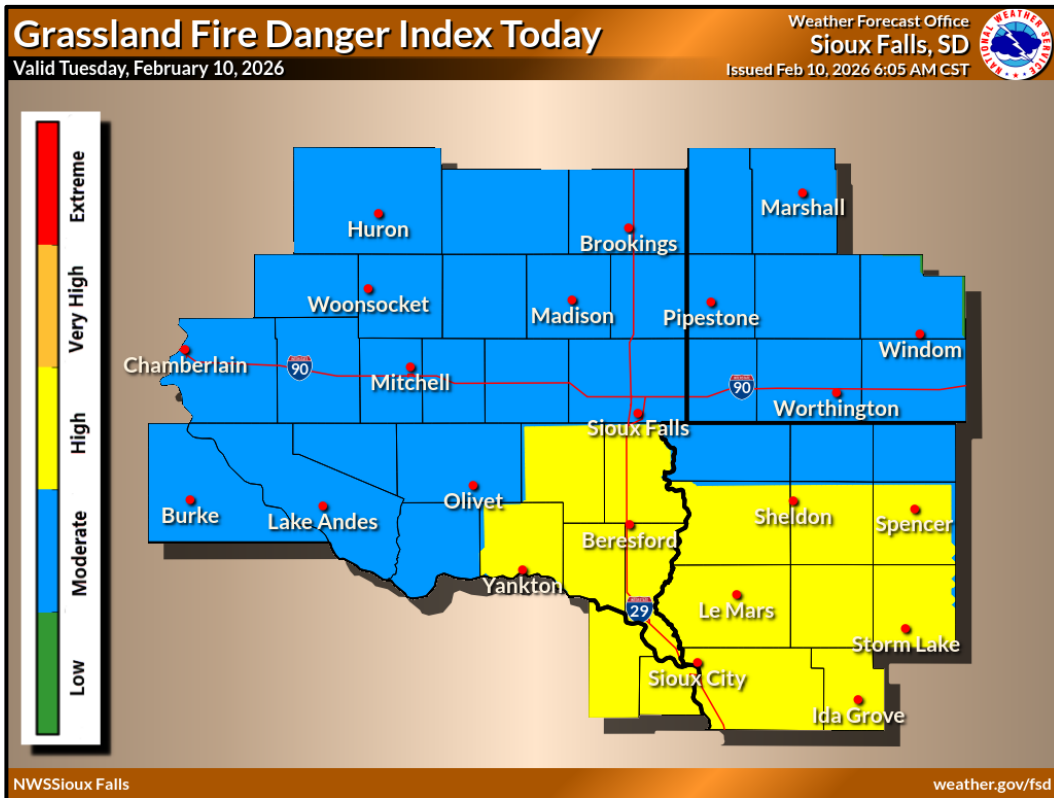
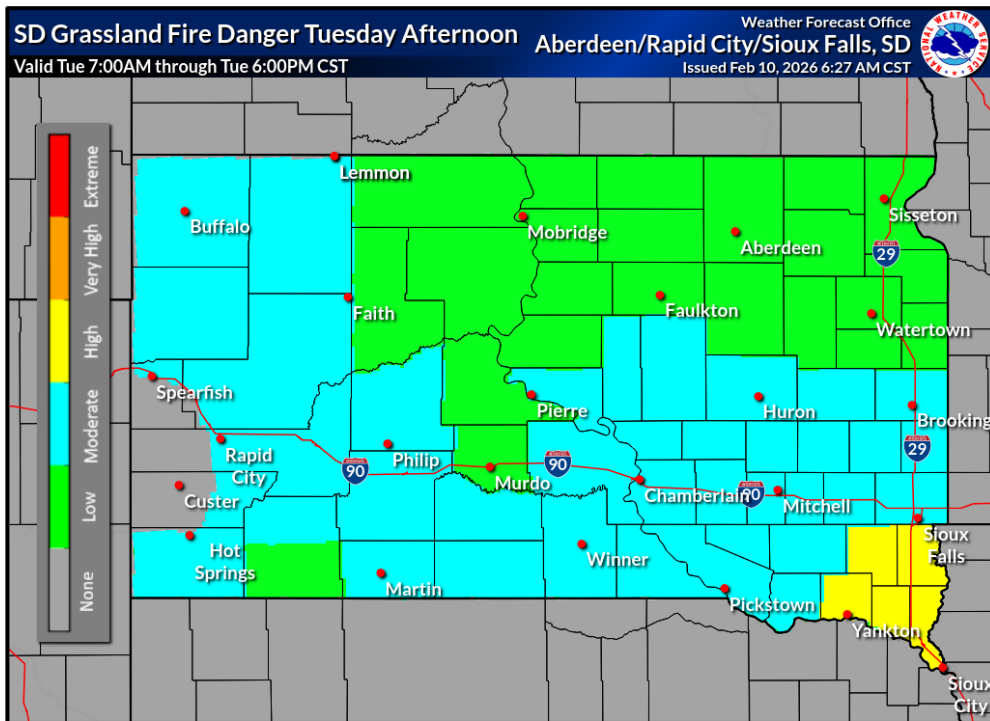


Figure 7 – East River South Dakota Grassland Fire



When elevated fire risk is identified, Oahe Electric activates predefined operational protocols. These may include, but are not limited to:

- Equipping all utility vehicles and field crews with fire extinguishers, ensuring compliance with preparedness for abnormal and emergency operating conditions;
- Enhancing situational communication with all field personnel regarding fire conditions and safety procedures.
- Prioritize usage of diesel fueled utility vehicles on red flag days.

Operational alerts are disseminated through internal communication platforms to all relevant staff and field teams, ensuring alignment and rapid response during periods of increased fire danger.

By leveraging real-time data, implementing structured response plans, and maintaining strong internal coordination, Oahe Electric demonstrates its commitment to minimizing wildfire risk, protecting public and worker safety, and ensuring the continued reliability of its electric distribution system during critical fire weather events.

SECTION 5 PUBLIC SAFETY POWER SHUTOFF

A Public Safety Power Shutoff (PSPS) is a precautionary measure used by electric utilities to reduce the risk of wildfires caused by electrical infrastructure. During periods of extreme fire weather utilities may proactively de-energize power lines in high-risk areas to prevent potential ignition sources, such as arcing conductors or equipment failures.

The PSPS strategy is most applicable in regions with high wildfire vulnerability and provides an additional layer of defense against utility-caused ignitions. However, while PSPS can significantly reduce fire risk, it also presents challenges, including service disruptions that may impact critical infrastructure, emergency communications, and member well-being.

At this time, Oahe Electric has elected to implement a PSPS protocol under the conditions set forth in Section 6.3 of this Plan. This decision is based on a comprehensive evaluation of wildfire risk across the Cooperative's service territory and the effect PSPS would have on the membership.

The Cooperative also recognizes the significant impacts that a PSPS event could have on its membership. Many members rely on uninterrupted power for life-sustaining medical equipment, home heating, communication systems, and access to water in rural areas. Interruptions in service could compromise public safety, hinder emergency response capabilities, and impose financial burdens on households and businesses. In areas with limited access to backup generation, these effects may be more severe.

Should conditions change in the future, such as increased wildfire risk driven by climate variability, vegetation growth, or system vulnerability, Oahe Electric will reevaluate the above considerations and potential role of PSPS in its wildfire prevention strategy. If a PSPS protocol is adopted, the Cooperative will establish clear operational criteria, including:

- Defined risk thresholds for initiating a PSPS;
- Procedures for minimizing the duration of outages and ensuring safe re-energization of lines;
- Advance notifications to members, whenever feasible, to allow adequate preparation;
- Coordination with local emergency services and public health agencies to protect vulnerable populations.

By prioritizing proactive mitigation over reactive shutdowns, Oahe Electric upholds its commitment to public safety, system reliability, and member service.

SECTION 6 COOPERATIVE RESPONSE

Oahe Electric focuses on ensuring staff readiness through effective communication, and coordinated action with emergency services and the community.

6.1 Cooperative Staff Preparedness

Oahe Electric prioritizes training and preparedness to ensure that staff are equipped to respond to wildfire situations:

- Procedures and Protocols: All field staff are trained on wildfire response protocols, including emergency communication, evacuation procedures, and equipment safety measures.
- Simulation Exercises: Routine drills simulate wildfire scenarios, providing hands-on experience for staff to practice response actions, communication strategies, and coordination with external agencies.
- Ongoing Training: Employees participate in periodic training sessions to stay current on best practices for wildfire mitigation and emergency response.

Oahe Electric collaborates with external agencies to enhance community preparedness and safety. This includes joint training initiatives with local fire departments, area fire marshals, emergency management agencies, and other relevant organizations. These collaborative efforts help improve coordination during emergencies, ensure clear communication protocols, and provide valuable education on wildfire prevention and response strategies.

6.2 Cooperative Reporting of Fires

Oahe Electric complies with South Dakota state laws requiring prompt reporting of unauthorized fires. Occupants of affected properties must notify the nearest forestry office, fire department, or appropriate authority as outlined in South Dakota Statutes 22-33-9.4. Failure to report fires can result in penalties, including misdemeanor charges and liability for damages if the fire spreads.

6.3 Cooperative Response During a Fire

When Oahe Electric is notified of a wildfire suspected to involve utility infrastructure within its service territory, the Cooperative takes all reasonable and practicable steps to mobilize resources, respond effectively, and prevent further fire spread. Upon notification, Oahe Electric activates its emergency response protocols to ensure a coordinated, safe, and timely response.

Key actions include:

- Monitoring wildfire conditions, including direction, rate of spread, and proximity to electrical infrastructure;

- Coordinating with field personnel and first responders to assess the situation and determine appropriate operational responses;
- De-energizing affected facilities when necessary to protect public safety, personnel, and property on a case-by-case basis.

The decision to de-energize any portion of the electric system is based on real-time field assessments, risk evaluation, and operational priorities. The following considerations determine whether or not a line may be de-energized: Requests from local fire chiefs, Incident Command, or other emergency management authorities are carefully reviewed and implemented when deemed necessary to mitigate hazards and support firefighting operations.

Oahe Electric personnel maintain ongoing communication with local fire departments, emergency medical services, hospitals, and government agencies to coordinate response efforts and ensure public safety. The Cooperative also plays a critical role in public information efforts by disseminating timely updates through multiple communication channels, including:

- Social media platforms;
- Direct member communications (e.g., text, email, or manual calls, where applicable).

This comprehensive response framework ensures that Oahe Electric can act quickly and responsibly during wildfire emergencies, minimizing risk to infrastructure and the communities it serves while maintaining alignment with industry safety standards and emergency coordination best practices.

6.4 Community Outreach

Oahe Electric's General Manager, CFO, Executive Services Specialist and its employees are responsible for managing public information, including public relations, media relations, advertising, social media, and crisis communications. The departments utilize various tools such as the website, direct mail, email, social media, and paid advertising to educate and inform members.

The General Manager, COO and/or CFO also maintains regular communication with key accounts, keeping them informed about changes in operating conditions, coordinating scheduled outages, providing situational awareness, and addressing other important topics.

6.5 Outage Response Due To Fire

During a fire, Oahe Electric may have members without power due to damages to Oahe Electric's facilities from the fire or from planned outages. Once the area has been deemed safe for Cooperative crews to work by the fire department authority, Oahe Electric will work to re-establish power to all services that can accept it. Dependent upon the damage from the fire, this may require significant construction from the Cooperative and not all electric services may be in a condition to receive power.

6.6 After Fire Documentation

After a wildfire has been suppressed and no further threat is identified, Oahe Electric will assess the extent of damage to its electrical facilities. If Oahe Electric's infrastructure was suspected as a source of ignition, Oahe Electric will also investigate the cause of the fire with the expertise of a reputable third-party fire investigation firm. The findings from the investigation will be thoroughly documented. This documentation is critical for identifying causes and defending against liability, particularly if the fire is determined to have originated from external factors, such as member activities or unmaintained vegetation.

APPENDIX A – REFERENCES

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