DAKOTA ENERGY COOPERATIVE

WILDFIRE MITIGATION PLAN

2026

Wildfire Mitigation Plan
For
Dakota Energy Cooperative
Huron, SD

2026

Respectfully Submitted,

STAR ENERGY SERVICES LLC

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SECTION 1 INTRODUCTION

1.1 Objectives

The primary objective of Dakota Energy Cooperative's (DEC'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, DEC 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. This analysis identifies regions within DEC's service territory with a higher wildfire likelihood, enabling the Cooperative to prioritize mitigation activities effectively. 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	1,326	1,319	99.5%
Primary Underground Conductor	1,203	1,192	99.0%
Poles	22,838	22,557	99.8%

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

1.2 Service Area

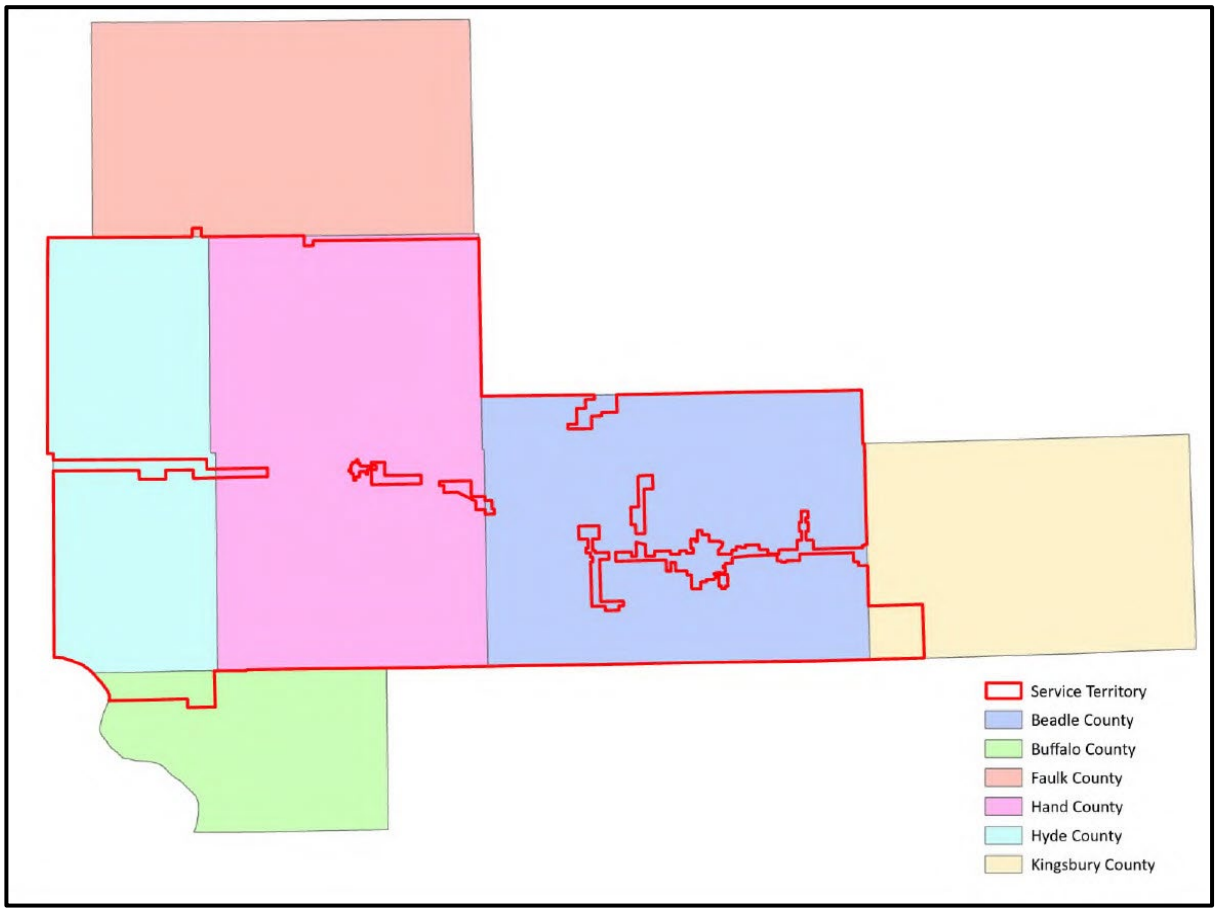
DEC is a distribution cooperative that serves the rural areas in Beadle, Hand and Hyde, and portions of Miner, Spink, Kingsbury, Faulk, Buffalo, and Sully counties in South Dakota. With headquarters in Huron, South Dakota, DEC currently serves 2,264 members, mostly located in rural residential areas.

DEC's service area includes agriculture fields, commercial loads and rocky ravines along with western banks of the Missouri River. DEC's wildfire mitigation efforts focus on maintaining vegetation around power lines, monitoring system conditions, and implementing proactive measures to address areas with elevated risk. Additionally, the Cooperative emphasizes clear communication with its members to ensure a coordinated response in the event of a wildfire.

1.3 Duration of the Wildfire Mitigation Plan

DEC's 2026 Wildfire Mitigation Plan marks the organization's first formal, comprehensive effort dedicated to reducing wildfire risk. Although a documented plan had not previously been in place, DEC 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 to ensure it remains effective and up to date.

Figure 1 – Service Territory Map



SECTION 2 ASSESSMENT OF RISKS

2.1 Risk Factors

Wildfires are becoming an increasingly significant threat, driven by a combination of environmental changes, population growth in fire-prone areas, and aging infrastructure. Since the 1980s, the annual area burned by wildfires in the United States has increased substantially, with the western and southwestern regions of the country experiencing the most pronounced impacts. This trend correlates with rising global temperatures, extended dry seasons, and altered precipitation patterns. Notably, many of the warmest years on record have occurred within the past two decades, contributing to drier vegetation and more frequent, intense wildfire events.

The expansion of human development into the Wildland-Urban Interface (WUI) further elevates wildfire risk. As more people and structures are located in these high-risk areas, the likelihood of human-caused ignitions rises, while wildfire suppression and evacuation efforts become increasingly complex. This growth amplifies the potential for loss of life and property damage during fire events.

Aging infrastructure, particularly within energy systems, also plays a critical role in wildfire ignition. Older power lines and electrical equipment are more susceptible to failure, especially under dry and windy conditions. 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

Aging utility infrastructure has been identified as a contributing factor in several major utility-caused wildfires across the United States. 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 leaning or 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. While these measures can significantly lower wildfire risk, their high costs and logistical complexity can pose challenges.

Despite these challenges, DEC 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 is actively developing a long-term plan for system upgrades that carefully balances safety, reliability, and financial feasibility.

2.1.2 Population Growth and Wildland-Urban Interface

Over the past decade, DEC's service territory has experienced modest population growth. DEC 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 DEC's service territory exist Cooperative members who are located in 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 DEC's service territory and WUI zones are discussed in Section 2.2.3.

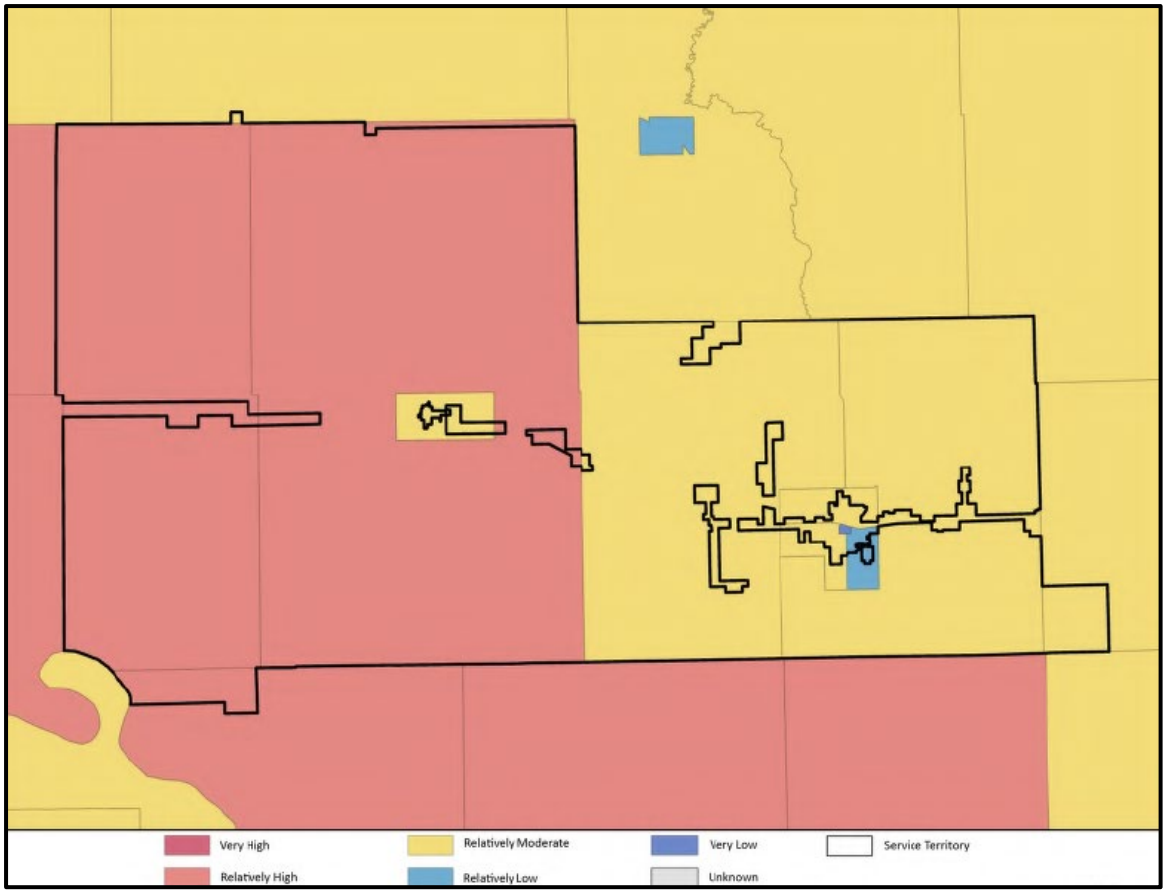
2.2 Wildfire Risk Assessment

Conducting a comprehensive wildfire risk assessment is a critical step in understanding and mitigating potential threats to DEC's service territory. By evaluating the factors that contribute to wildfire risks, such as environmental conditions, infrastructure vulnerabilities, and population growth in WUI areas, DEC 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 DEC's service territory. As shown, wildfire risk levels within the territory are relatively moderate to relatively high.

Figure 2 – FEMA National Risk Index for Wildfire



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

By overlaying DEC'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 DEC's service territory, most of its infrastructure is located in census tracts classified as having relatively high to very high wildfire risk.

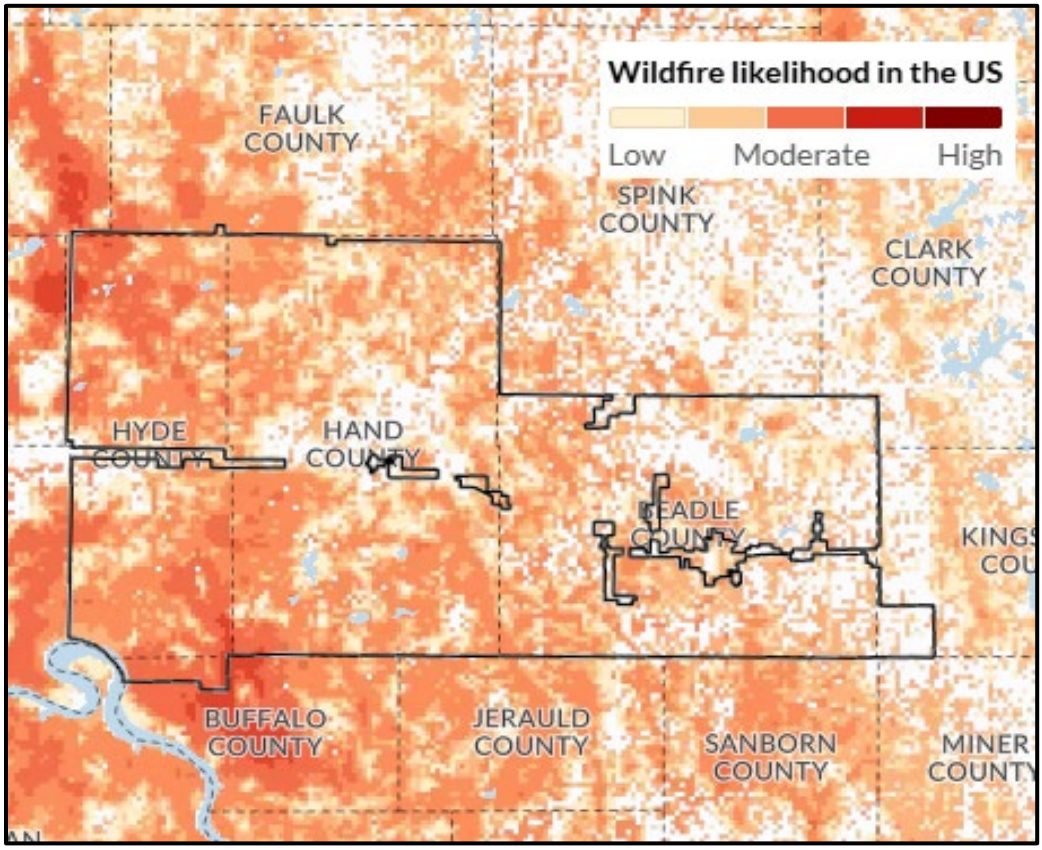
Table 2 – FEMA National Risk Index for Wildfire & Distribution Assets

Asset Type		Relatively High to Very High	Relatively Moderate	Very Low to Relatively Low
Primary Overhead Conductor	**Miles**	592	729	7
	%	44.9%	55.0%	0.6%
Primary Underground Conductor	**Miles**	778	423	14
	%	64.6%	35.2%	1.2%
Poles	**#**	9,833	12,911	94
	%	43.1%	56.5%	0.4%

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 DEC. According to the data, wildfire risk in these areas is generally classified as low to moderate high.

Figure 3 – USDA Wildfire Likelihood



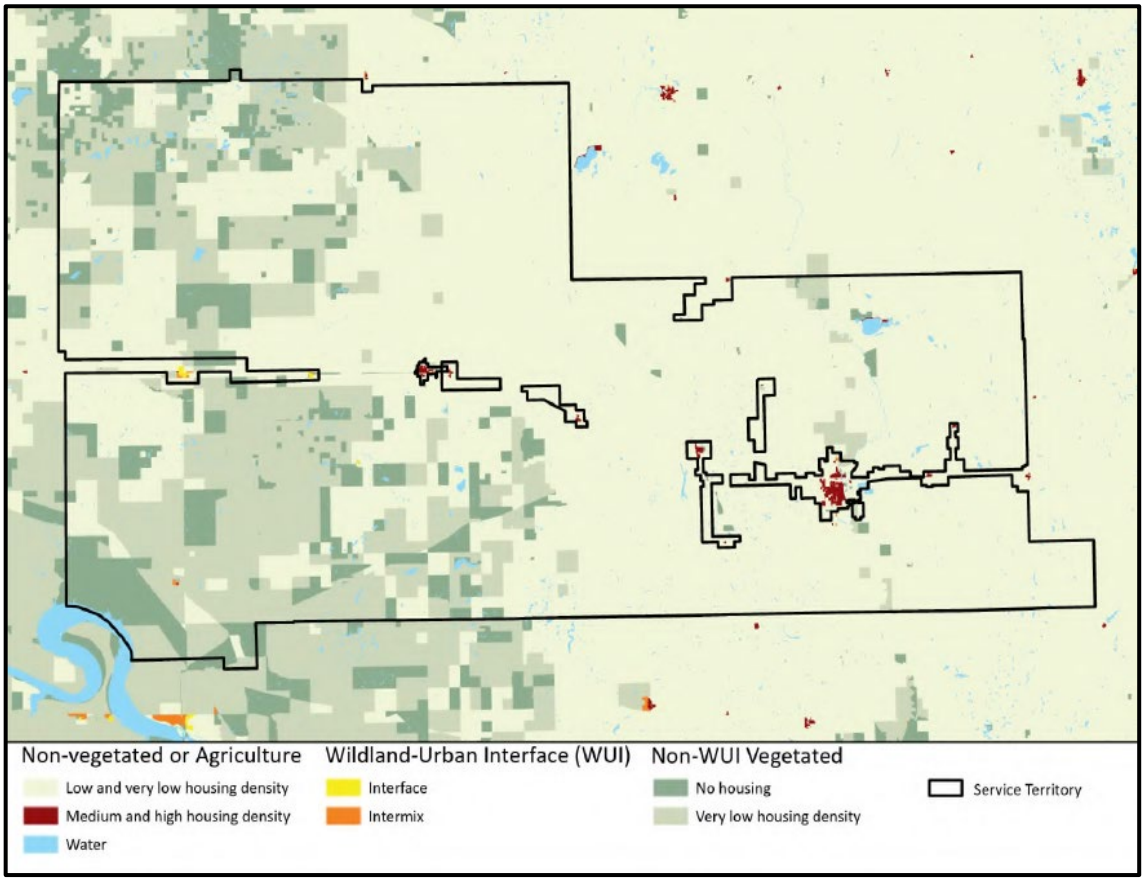
Source: www.wildfirerisk.org

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 DEC'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

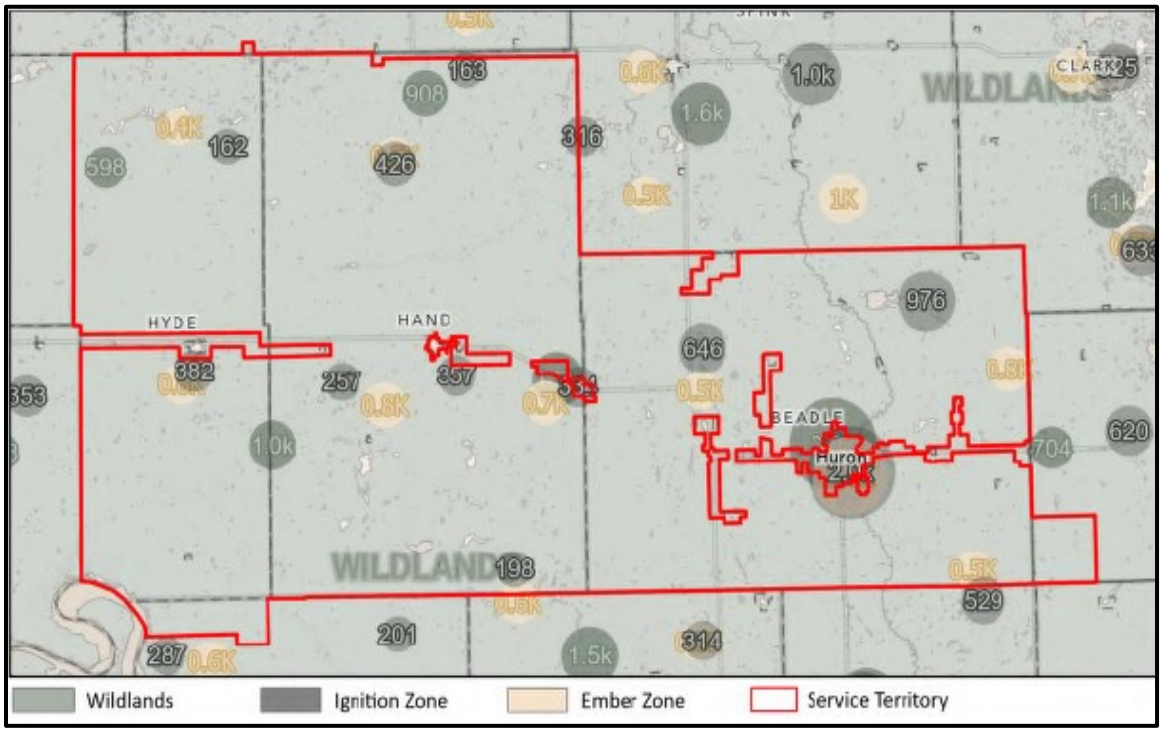


Source: U.S. Fire Administration WUI Fire Community Awareness Explorer

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 DEC'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 proactive vegetation management, thorough inspections of overhead and underground infrastructure, and system hardening measures. By implementing these strategies, utilities can improve safety, protect communities, and reduce the likelihood of utility-related wildfires.

3.1 Vegetation Management

Effective vegetation management is a foundational component of DEC's wildfire prevention strategy. By systematically reducing fuel sources near power lines and electrical equipment, vegetation management significantly lowers the risk of wildfires caused by faulted utility infrastructure. The core objectives of this program are to maintain clear rights-of-way (ROW), remove dead or 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 overgrown, dead, or dying trees within the ROW. This is particularly critical in wildfire-prone areas, where vegetation can be easily ignited during extreme weather events or come into contact with energized lines, triggering fire ignition. ROW maintenance involves trimming or removing vegetation that poses a risk, regardless of whether the land is publicly, privately, or federally owned. When operating on non-DEC-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 thoroughly documented to ensure compliance and to demonstrate proactive risk reduction efforts.

DEC follows a structured vegetation management cycle, typically performing trimming on a three-year rotation. High-risk areas, such as those with dense vegetation or a history of vegetation-related outages, are recorded and trimmed accordingly. 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, DEC 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

DEC 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.

Inspections are critical for identifying conditions that could contribute to wildfires, such as damaged poles, sagging lines, or overgrown vegetation. Early detection of these issues allows for timely mitigation, reducing the likelihood of utility-caused wildfires. DEC 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.

By maintaining rigorous inspection standards and leveraging modern tools, DEC continues to prioritize the safety and reliability of its infrastructure while mitigating wildfire risks across its service territory.

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. DEC 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

DEC 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 is completed to determine if there are any internal voids in the pole.

These rigorous inspection practices ensure that potential risks are identified early, mitigating safety hazards and reducing the likelihood of infrastructure failures that could contribute to wildfire risks.

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 immediately and no more than within a two-week period.

3.2.2 Hardware Inspections

DEC performs hardware inspections on a three-year rotation for a full review of all overhead lines. Inspections focus on identifying and addressing potential issues with key components, including cutouts, insulators, crossarms, guying attachments, conductors, connectors, and switches. DEC's line crew looks for corrosion, loose hardware and signs of wear and tear, overheating, and damage caused by environmental factors or wildlife. Additionally, every three years the distribution system is driven out and visually inspected. This structured approach ensures timely maintenance, reducing risks of equipment failure and mitigating wildfire hazards.

3.2.3 Underground/Enclosure Inspections

DEC conducts inspections of underground and pad-mount enclosure equipment on a three-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. Advanced tools, such as infrared imaging, may also be used to identify potential overheating in arresters or elbows, which could indicate impending failures.

3.2.4 Substation Inspections

The substations supplying DEC's distribution system are owned and operated by East River Electric Power Cooperative ("East River"). East River conducts inspections and maintenance of those facilities under its own maintenance and wildfire mitigation programs.

To complement visual inspections, East River Electric Power Cooperative employs advanced thermal imaging technology on an annual basis. This technique allows for the detection of abnormal heat signatures that may signal equipment degradation or imminent failure, such as overheating connections or failing components. Early identification of these issues enables timely maintenance and reduces the risk of unplanned outages or fire hazards. East River Electric Power Cooperative repairs identified issues from thermal imaging within two weeks of discovery.

DEC's responsibilities under this Wildfire Mitigation Plan apply to the distribution facilities owned or operated by DEC. Any concerns involving East River-owned substation facilities that are identified by DEC personnel will be communicated to East River as appropriate.

3.3 Additional Efforts

In addition to its comprehensive vegetation management and inspection programs, DEC 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. In areas where underground construction is not practical or cost-effective, DEC prioritizes enhanced overhead line clearance, ensuring adequate distance between energized conductors and surrounding vegetation or other combustible materials.

To further mitigate ignition hazards, DEC only uses vacuum-based or electronic type reclosers throughout the system. These advanced technologies operate without expelling oil, vapor, or sparks, making them better suited for deployment in fire-prone environments.

Through these targeted infrastructure upgrades, DEC demonstrates its ongoing commitment to reducing wildfire risk, safeguarding its members, and strengthening the resilience of its electrical distribution system.

SECTION 4 CONDITION MONITORING

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

The Cooperative monitors fire-weather conditions through authoritative sources, including the National Weather Service, the Storm Prediction Center, and applicable state emergency-management systems. During the fire-weather season, East River may also provide informational notices to affected members when East River places a portion of its transmission system into or out of emergency operations in response to Very High or Extreme Fire Danger conditions. Any information received from East River is supplemental, and DEC remains responsible for monitoring conditions affecting its distribution system and determining and implementing the actions required under this Plan.

Figure 6 – East River Grassland Fire Danger Index

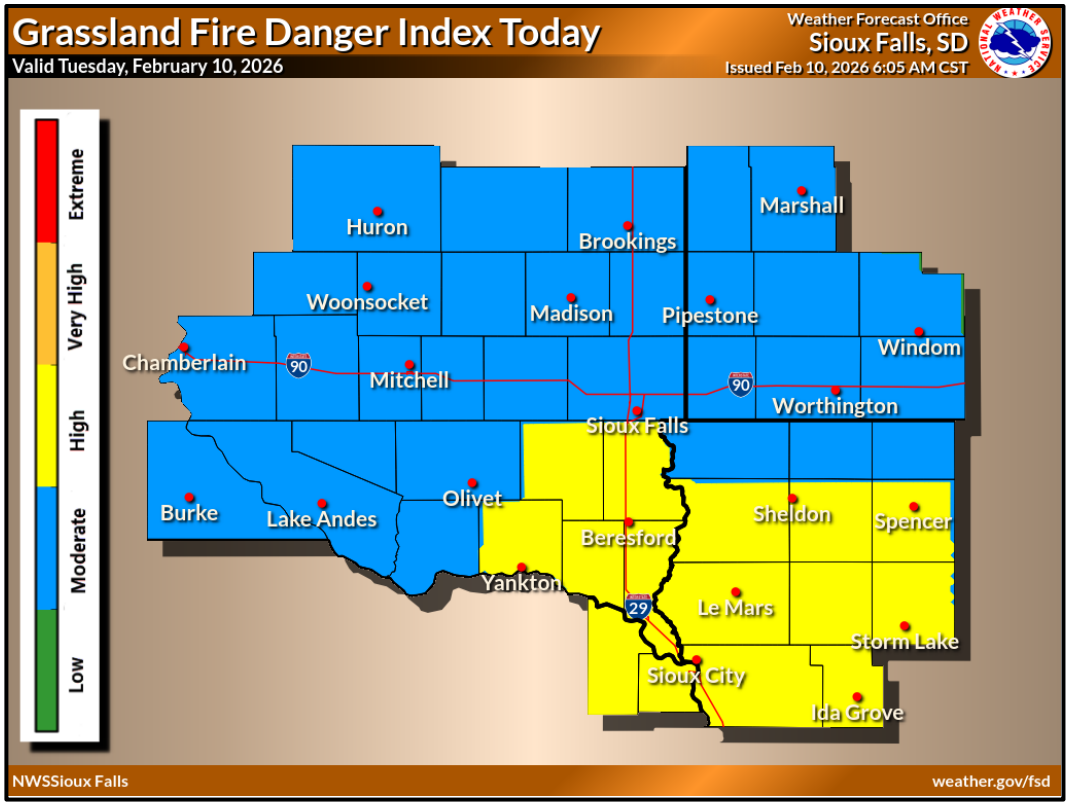
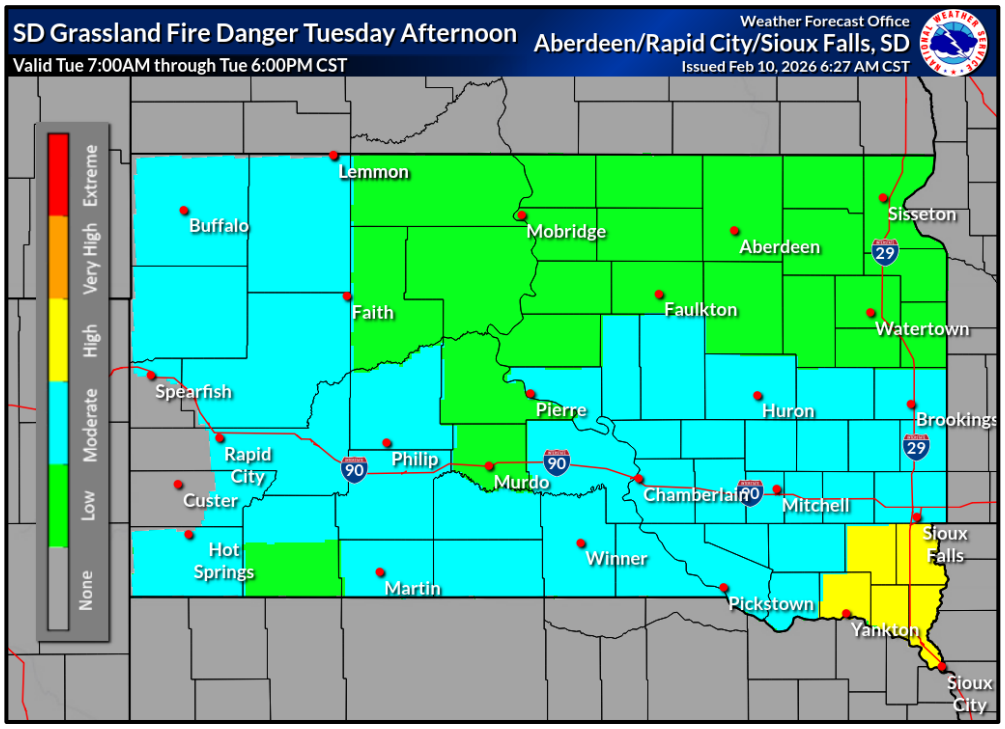


Figure 7 – East River South Dakota Grassland Fire



When elevated fire risk is identified, DEC 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;
- Proactively set substation reclosers to trip only once instead of re-energizing in high-risk fire areas.

Clear communication is a cornerstone of DEC's approach. 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, DEC 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, DEC has elected not to implement a PSPS protocol. 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. DEC's ongoing wildfire mitigation efforts, including enhanced vegetation management, regular system inspections, risk-based asset maintenance, and targeted infrastructure upgrades, are currently sufficient to address potential ignition hazards without resorting to widespread de-energization.

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, DEC will reevaluate the 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, DEC upholds its commitment to public safety, system reliability, and member service. This approach reflects a balanced strategy that considers the unique characteristics of its service territory while aligning with best practices in wildfire risk management.

SECTION 6 COOPERATIVE RESPONSE

DEC has established detailed procedures to prepare personnel and guide the Cooperative's response in the event of a wildfire. These measures focus on ensuring staff readiness, effective communication, and coordinated action with emergency services and the community.

6.1 Cooperative Staff Preparedness

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

- Procedures and Protocols: All staff participate in emergency response training, including emergency communication, evacuation procedures, and equipment safety measures.
- Simulation Exercises: Annual emergency response training is conducted with EMS, Sheriff's Department, Fire Departments and/or emergency services, 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.

DEC 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. By working together, DEC and its partners can strengthen overall community resilience and enhance public safety.

6.2 Cooperative Reporting of Fires

DEC 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 DEC 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, DEC immediately 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. 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.

DEC 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 automated calls, where applicable).

This comprehensive response framework ensures that DEC 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

DEC's Communications Department and its Member Services Department is 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 Member Services Department 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, DEC may have members without power due to damages to DEC'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, DEC 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, DEC will assess the extent of damage to its electrical facilities. If DEC's infrastructure was suspected as a source of ignition, DEC 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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