

Arizona Public Service

Comprehensive Wildfire Mitigation Plan

CWMP

February 1, 2026

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1 OVERVIEW

Arizona continues to experience larger and more frequent wildfires throughout the landscape. APS is working to address the challenge of safely and reliably serving customers while mitigating wildfire potential. From 2010 to 2025, over 500 large fires greater than 100 acres in size burned across Arizona within ten miles of APS's service territory and associated electrical infrastructure. We are witnessing increasing trends in the size and frequency of wildfires. This increase in activity means we must remain adaptable and evolve, ensuring our mitigation measures are commensurate with the risk. We have implemented a comprehensive, multi-faceted approach utilizing strategies and programs centered around prevention, mitigation, and response to wildfires. This Comprehensive Wildfire Mitigation Plan (CWMP) outlines the approach and actions taken by APS in compliance with 2025 Ariz. Sess. Laws ch. 167 (HB2201).

In Arizona, over 48% of structures are in the Wildland Urban Interface (USDA, 2010). Furthermore, 71% of these structures are second homes and not primary residences, which can pose additional challenges in managing fuels and wildfire mitigation due to absentee ownership. Extended drought over several decades has caused forest and vegetation ecosystems to be stressed from the lack of regular and sufficient moisture and overall forest health has been declining due to several factors outside of APS's control. This has been compounded by shorter, drier winters and longer, warmer summers.

APS has developed a fire-risk model to assess risk based on a multitude of indicators such as available fuels and fire history. This Fire Risk Index (FRI) is used to determine which of APS's circuits are at the highest risk of wildfire. Those lines and their associated equipment are then the focus of the fire mitigation efforts outlined in this plan. In addition to understanding the risk level associated with the geographic location of electric lines, APS also calculates a current, near-term risk called Preparedness Levels (PL) based on conditions happening in the environment in the present such as current temperatures, relative humidities, fuel moisture levels, and wind speeds. The current PL dictates what operational mitigations are in effect at any given time in any particular location in the service territory.

APS's fire mitigation program is built on the following five key pillars:

Vegetation Management – the appropriate clearing of utility right of ways (ROWs) and lines in order to avoid contact between vegetation and live electric lines

Grid Hardening – updating and replacing electric grid equipment with newer technology in order to make the system less likely to spark ignitions and more resilient to wildfire

Asset Inspection – using a variety of methods to inspect equipment in high fire risk areas in order to ensure the health of those assets

Monitoring and Awareness – deploying technology to improve and increase situational awareness of environmental conditions which could contribute to wildfire as well as implementing modeling systems that give the Fire Mitigation Team the ability to better predict wildfire potential and growth

Operational Mitigations – developing and implementing changes to normal operational processes and procedures during times of higher wildfire risk

APS T&D employees are trained annually through computer-based training and a Wildfire Mitigation Forum, which ensures operations and maintenance personnel are well-versed in mitigation tools and operational procedures.

Furthermore, APS also supports fire management operations that include prescribed fire treatments as well as large-scale forest restoration treatments around power line ROWs in an effort to protect infrastructure and reintroduce fire into the ecosystem to prevent catastrophic wildfire events. This includes significant ongoing partnerships with public land managers, private landowners, and state and federal agencies.

APS conducts annual reviews of its CWMP and compliance thereto using a variety of internal and third-party resources.

1.1 CWMP COMPLIANCE WITH WILDFIRE LEGISLATION REQUIREMENTS

This CWMP is fully compliant with 2025 Ariz. Sess. Laws ch. 167 (HB2201). This CWMP is reasonable considering APS's size and resources, is in the public interest, meets the requirements of Subsection H in 2025 Ariz. Sess. Laws ch. 167 (Ariz. Rev. Stat. § 37-1311 H), and is designed to meet the specific conditions and risk of APS's service area.

Per the requirements in the legislation, this plan includes the following components:

Requirement 1: Identify preventive actions, protective equipment and monitoring programs that the public power entity or electric utility will carry out, install, repair, replace or implement to minimize the risk of a wildfire.

Relevant Content: Preventative actions: Section 7 - Operational Mitigations, Protective equipment: Section 4 – Grid Hardening, and Monitoring programs: Section 6 - Monitoring and Awareness

Requirement 2a: A description of areas within the geographic region where the public power entity's or electric utility's facilities may be subject to a heightened risk of wildfire.

Relevant Content: Section 2 - Wildfire Risk Assessment

Requirement 2b: A description of the procedures, standards and time frames that the public power entity or electric utility will use to inspect and operate the public power entity's or electric utility's infrastructure to mitigate the risk of wildfires.

Relevant Content: Inspect: Section 5 - Asset Inspection, Operate: Section 7 - Operational Mitigations

Requirement 2c: A description of the key individuals or position titles of those persons who are responsible for implementing the wildfire mitigation plan.

Relevant Content: Section 10 - Key Positions Responsible for CWMP

Requirement 2d: A description of the procedures for deenergizing power lines and disabling reclosers to mitigate potential wildfires or provide public safety power shut off plan.

Relevant Content: Disabling reclosers: Section 7.3 - No-Reclose Strategy (NRS), Public Safety Power Shutoff plan: Section 7.7 - Public Safety Power Shutoff

Requirement 2e: A description of the procedures, standards and time frames that the public power entity or electric utility will use to carry out vegetation management.

Relevant Content: Section 3 - Vegetation Management

Requirement 2f: A summary of the procedures the public power entity or electric utility intends to use to restore the public power entity's or electric utility's electrical system in the event of a wildfire.

Relevant Content: Section 8.4.2 - Restoration Procedures Following Wildfire

Requirement 2g: A description of community outreach and public awareness efforts.

Relevant Content: Section 7.7.2 - Outreach and Communication, Section 8.6 - Community Outreach and Public Communication, Section 8.7 - Stakeholder Cooperation and Community Engagement, and Section 9 - Industry Participation

Requirement 2h: A description of potential participation, if applicable, with state or local wildfire protection efforts.

Relevant Content: Section 8.7 - Stakeholder Cooperation and Community Engagement and Section 8.8 - Cooperation with Suppression Agencies

Requirement 2i: A description of how the public power entity or electric utility will monitor compliance with the wildfire mitigation plan.

Relevant Content: Section 11 - CWMP Compliance Reviews

2 WILDFIRE RISK ASSESSMENT

APS's service territory covers 11 of 15 Arizona counties and encompasses more than 35,000 square miles. The company maintains two outlooks on risk. The first is static risk denoted by the Fire Risk Index (FRI) which is based on long-term physical characteristics of an area like fire history, fuel characteristics, topography, community risk, population, and suppression response. The FRI is calculated for every 10-mile by 10-mile square of APS's service territory and dictates risk levels for each of APS's circuits. Areas of the service territory (and therefore the electric lines therein) are considered High Fire Risk (HFR) if the FRI of that area is a 3+. The second risk is "current risk". This is denoted by Preparedness Levels (PL) and these PLs are calculated weekly for each of APS's operating districts. PLs denote what the current level of wildfire risk is in an area and is used to modify operational processes as explained elsewhere in the CWMP. This section details the process APS uses to identify those areas of its service territory that are considered high fire risk which includes all or parts of the following counties, cities, or towns (numbers in parentheses are zip codes). This CWMP shall apply to all APS owned assets and those jointly owned assets APS operates.

Apache County

Concho (85924)

Cochise County

Benson (85602), Bisbee (85603), Douglas (85607), Hereford (85615), Mc Neal (85617), Naco (85620), Pirtleville (85626), Sierra Vista (85635, 85650), Tombstone (85638), Willcox (85643)

Coconino County

Ash Fork (86320), Bellemont (86015), Cameron (86020), Flagstaff (86001, 86004, 86005, 86011), Forest Lakes (85931), Grand Canyon (86023), Happy Jack (86024), Leupp (86035), Mormon Lake (86038), Munds Park (86017), North Rim (86052), Parks (86018), Supai (86435), Tuba City (86045), Williams (86046), Winslow (86047)

Gila County

Claypool (85532), Globe (85501), Miami (85539), Payson (85541), Peridot (85542), Pine (85544), Tonto Basin (85553), Winkelman (85192), Young (85554)

La Paz County

Bouse (85325), Parker (85344), Quartzsite (85346)

Maricopa County

Black Canyon City (85324), Carefree (85377), Cave Creek (85331), Fort McDowell (85264), Morristown (85342), New River (85087), Peoria (85383), Phoenix (85085, 85086), Scottsdale (85255, 85262, 85266), Surprise (85387), Wickenburg (85390), Wittmann (85361)

Navajo County

Heber (85928), Lakeside (85929), Show Low (85901), Snowflake (85937), Taylor (85939)

Pima County

Marana (85658)

Pinal County

Florence (85132), Hayden (85135), Kearny (85137), Mammoth (85618), Oracle (85623), San Manuel (85631), Superior (85173)

Yavapai County

Camp Verde (86322), Chino Valley (86323), Clarkdale (86324), Congress (85332), Cornville (86325), Cottonwood (86326), Crown King (86343), Dewey (86327), Humboldt (86329), Jerome (86331), Kirkland (86332), Mayer (86333), Paulden (86334), Prescott (86301, 86303, 86305), Prescott Valley (86314, 86315), Rimrock (86335), Sedona (86336, 86351), Seligman (86337), Skull Valley (86338), Yarnell (85362)



Figure 1 – Map of APS Service Territory

2.1 FIRE RISK INDEX (FRI)

The Fire Risk Index (FRI) was developed as a risk-informed decision framework to identify overall wildfire risk within APS’s service territory and thereby drive potential mitigation plans and programs. This is not intended to be a short-term analysis that will change from year to year but is intended to be the base model for long-term risk assessment. This risk assessment is unique to APS and the electrical utility given the threat presented and relevant considerations. The FRI is an unweighted scalar function that translates into a range or final FRI. A Delphi scoring

system, with input from Fire SMEs around the state, publicly available data and institutional knowledge of fire fuels and wildland fire science here in Arizona, assisted in development of the FRI.

The subject matter expertise of APS Fire Mitigation Specialists (FMS) and institutional knowledge played a key role in creating the framework and interpreting the data. Three main score values were created: Trigger Event (TE) which is the probability of fire ignition, Consequence (C) which is the probability a fire will carry, and Consequence Impact (CI) which is the impact a fire would have if it occurred. For each of the three values, five individual attributes were analyzed to form an aggregate score. Trigger Event includes fire history, weather and climate, fuel arrangement, high use impacts, and prescriptive fire use. Consequence includes suppression response, fuel and topography, wildland-urban-interface, fuel characteristics, and fuel loading. Consequence Impact includes community risk, system reliability, environmental impact, population, and reconstruction.

The statewide service territory was divided into 10-mile by 10-mile grids capturing all APS transmission and distribution lines and assets. For each grid, and for each of TE, C, and CI, the five attributes were evaluated and assigned a point value of 1 to 10 based on publicly available historical data from fire-related institutions and land managers throughout the southwest. That created a total of 50 possible points for each main score value and a maximum total of 150 for each grid, assuming an equal weighting across the three main score values. Each aggregate grid score rating was then evaluated against a table and assigned a value from 1 to 5 in 0.5 increments for a total of 9 FRI classifications.

Probability of Ignition (TE)	Probability a Fire will Carry (C)	Fire Impact (CI)
Fire History 9	Suppression Response 2	Community Risk 10
Weather/Climate 5	Fuel & Topography 10	Reliability 10
Fuel Arrangement 7	WUI 10	Environmental Impact 10
High Use Impact 3	Fuel Characteristics 7	Population 5
Fire Use/Rx 7	Fuel Loading 7	Reconstruction 5
(31)	(36)	(40)

Figure 2 - Example of APS Wildfire Risk Assessment scoring

In the current version of APS’s FRI calculation, each of the three main score values (TE, C, and CI) are given equal weighting, but this could be changed if conditions warrant it. As an example, and using the sample data in the table above, this 10-mile by 10-mile grid would receive an aggregate score of: $((TE=31)*1) + ((C=36)*1) + ((CI=40) *1) = 107$.

Table 1 - Scoring index for each fire risk index and associated breaks

Risk Index		
5	134	150
4.5	117	133
4	100	116
3.5	83	99
3	66	82
2.5	49	65
2	32	48
1.5	15	31
1	0	14

The aggregate score is then reviewed against the above table to determine the final FRI for this grid. In the example, the score of 107 would translate into an FRI of 4.

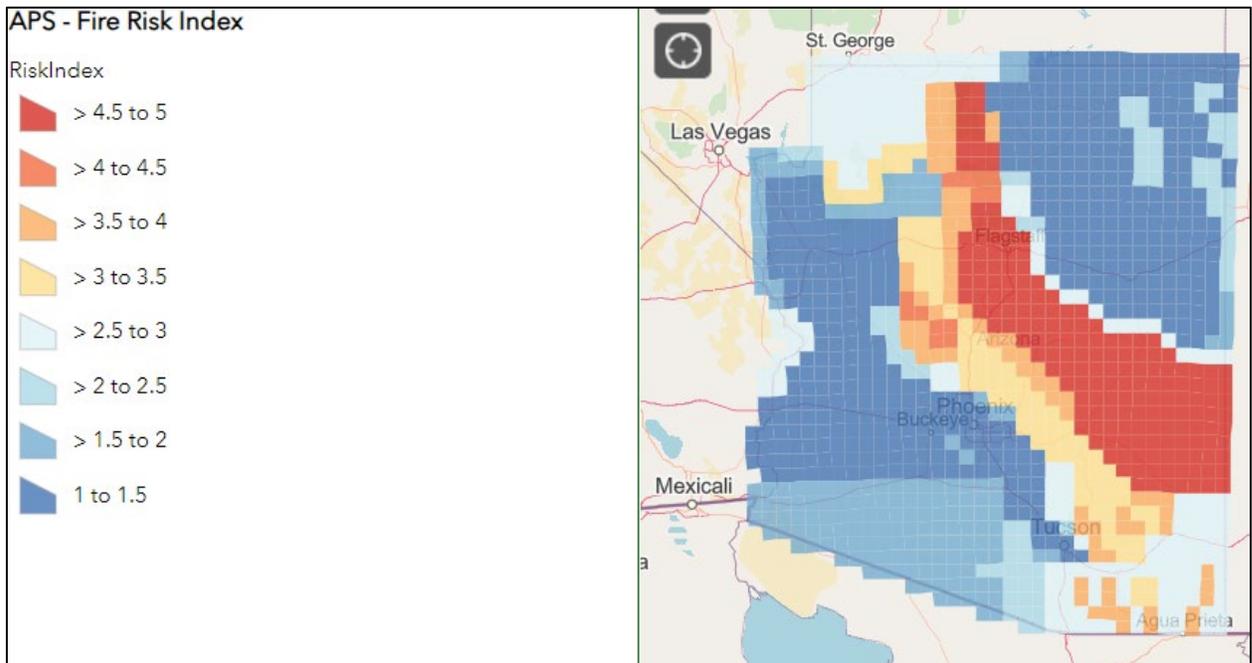


Figure 3 – Map of the current APS Fire Risk Index

The analysis conducted to create the indices specifically categorizes the wildfire threat to the APS Transmission and Distribution system statewide and is utilized in prioritizing areas for system improvement and grid hardening. This is accomplished with ArcGIS mapping. The FRI is depicted as a layer in ArcGIS and can be cross-referenced with other layers or features to determine the applicable risk and assist in decision making based on that risk.

In 2026, APS will be refreshing the FRI methodology which will increase the granularity of the analysis resulting in smaller individual polygons. This will more precisely bound fire risk. Following the 2026 refresh, APS will institute a 5-year cycle for subsequent refreshes.

2.2 PREPAREDNESS LEVELS (PL)

The APS PL is used to create situational awareness and provide direction on the appropriate operational protocols to be used at a given time as it reflects current conditions and risks. APS PLs are dictated by fuels, weather conditions, fire activity, and the probability of a fire ignition due to the functions of the utility business. PLs are calculated using several indices that are evaluated weekly by APS Wildfire SMEs to determine the risk by operational and maintenance districts across the APS service territory. The five PLs range from the lowest risk (1) to the highest risk (5). Each one includes specific management actions and involves increasing levels of situational awareness and industrial work restrictions as conditions change.

2.2.1 Preparedness Level Components

The APS Wildfire mitigation program relies on scientific data collected to help predict potential fire danger and the threat to the grid. Eight important data points are utilized in calculating current PLs and are provided to APS by applicable federal and state agencies. A short description of each index is presented below:

Ignition Component is a rating of the likelihood that a firebrand will ignite a fire if it lands on a receptive fuel bed. This metric provides an understanding of the potential for ignition based on current temperatures and fuel moisture content. Ignition component data is derived from the Interagency Dispatch Centers as well as available on the Southwest Coordination Center (SWCC) website.

7-Day Fire Potential outlook is an indicator of trends and expected conditions over the next week and is largely a function of fuel conditions, weather and resource availability.

Fire Weather Forecast including winds, relative humidity and temperature are indicators of potential fire behavior and are available from the National Weather Service.

The Energy Release Component is based on the estimated available energy released per unit area in the flaming front of a fire. The day-to-day variations of the ERC are caused by changes in the moisture contents of the various fuel classes, including the 1,000-hour time lag class. The ERC is derived from predictions of the rate of heat release per unit area during flaming combustion and the duration of flaming.

Dead Fuel Moisture - 1000 Hr is an indicator of long-term drought and overall fuel conditions. Fuel moisture content is the water content of a fuel particle expressed as a percentage of the oven dry weight of the fuel particle. This measurement is representative of the fuel's susceptibility to carry fire, and the probability the fuel will ignite given an ignition source.

6-10 Day Precipitation Outlooks captured from the Climate Prediction Center are considered as well for expected conditions and potential for progression through the PLs.

Publicly Managed Lands Fire Restrictions is the current fire restriction level by federal, state and municipal agencies. The current restriction and the associated industrial plan are communicated during zone restriction calls and can be found on the Southwest Area Fire Restrictions Dashboard.

Fire Danger Rating is the overall national fire danger rating system (NFDRS) current rating for publicly managed lands and is a part of the decision matrix. NFDRS is a system that allows fire managers to estimate today's or tomorrow's fire danger for a given area and links an organization's readiness level to the potential for fire conditions. NFDRS Adjective ratings range from low to extreme.

2.2.2 Preparedness Level Calculation

In close alignment with state and federal agencies, APS Fire Mitigation specialists establish PLs throughout the calendar year to proactively prepare and respond to wildfire incidents. PLs are dictated by fuel and weather conditions, current and expected fire activity and potential impact to APS systems and stakeholders. Not all criteria within each level must be met to warrant a shift in level but are intended to be guidelines for decision making. The decision support matrix is used with subject matter expertise to warrant a change in PL.

Separate PLs are calculated for each APS district. The 13 APS districts (shown below) vary geographically across the state by fuels, topography and weather conditions, and therefore are analyzed individually.

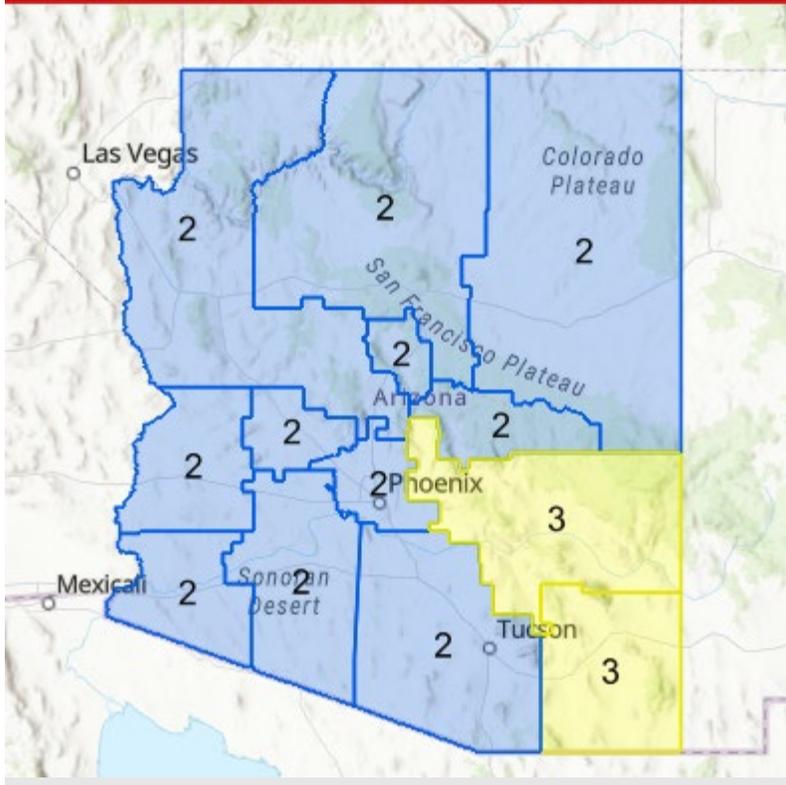


Figure 4 - Example of APS state districts with an associated P-level assigned

The PLs are evaluated weekly. Evaluation of current wildfire indices is utilized for both increases and decreases in the PL. The nine wildfire components detailed in the previous section are used in deriving the current PL for each APS geographic district. A decision support matrix was created to document changes in PLs throughout the year in which all indices are monitored and utilized to calculate the appropriate PL. Data used in evaluations are derived from publicly available sources including Southwest Coordination Center (SWCC), National Interagency Fire Center (NIFC) and APS proprietary information. Each wildfire metric is evaluated and scored from one to five with five representing the greatest risk. Both the cumulative and average scores of all metrics are used to determine the current PL for each APS District.

District Preparedness Level (DPL)					
Ignition Component:	0-19% = 1	20-39% = 2	40-69% = 3	70-79% = 4	>79% = 5
Fire Weather:	Below Normal = 1	Normal = 2	Above Normal = 4	Extreme = 5	
7 Day Fire Potential:	No Data = 1	Little Risk = 2	Low Risk = 3	Moderate Risk = 4	High Risk Triggers = 5
ERC Percentile:	0-24% = 1	25 – 49% = 2	50-89% = 3	90-96% = 4	>96% = 5
Fuel Moisture (1000Hr):	>20% = 1	13-20% = 2	9-12% = 3	6-8% = 4	< 6% = 5
Precipitation (6-10 Day Outlook):	Likely Above = 1	Leaning Above = 2	Near Normal = 3	Leaning Below = 4	Likely Below = 5
NFRS Fire Danger:	Low = 1	Moderate = 2	High = 3	Very High = 4	Extreme = 5
Publicly managed Lands Fire Restrictions:	None = 1	Stage 1 = 3	Stage 2 = 4	Closure = 5	

Figure 5 - Decision support matrix for APS PL determinations

The current PL for each district can be found on the APS Fire Awareness Dashboard, Wildfire Mitigation SharePoint, and is communicated via email to a wide distribution list anytime there is a change.

3 VEGETATION MANAGEMENT

3.1 INTEGRATED VEGETATION MANAGEMENT (IVM)

The APS Vegetation Management program is based on Integrated Vegetation Management (IVM). This vegetation management methodology is a system of managing plant communities by identifying compatible and incompatible vegetation and evaluating, selecting, and implementing the most appropriate control methods to ensure the safe, reliable delivery of electricity to customers, meeting APS's established objectives. The IVM approach/methodology is consistent with Part 7 of the November 2023 published version of the American National Standards Institute (ANSI) A300 standards and is an integral part of the CWMP. This includes:

- Set Objectives – such as promoting safety, preventing sustained outages caused by vegetation growing into electric facilities, maintaining regulatory compliance, protecting structures, and security
- Evaluate the Site – inspection of ROWs before, during and after vegetation management work to identify and target incompatible vegetation that poses a risk or identifies a situation that would not be consistent with the APS set of objectives
- Define Action Thresholds – set the level at which a method of control would be initiated
- Evaluate and Select Control Methods – selecting the most appropriate vegetation control methods including manual, mechanical, and chemical techniques
- Implement IVM – removing and pruning incompatible vegetation under and around utility lines and infrastructure through careful, targeted manual and mechanical treatments
- Monitor Treatment and Quality Assurance – post-work monitoring of treatment effectiveness and quality – the ROWs are inspected annually to plan, prioritize and conduct utility vegetation management work, in compliance with FERC reliability standard (FAC 003-4)

3.2 CYCLE-BASED VEGETATION MANAGEMENT

Vegetation management is conducted along all APS lines. The goal of this activity is to ensure lines stay clear of vegetation that could otherwise cause outages or fires. Multiple techniques are utilized including pruning, plant and tree removal, and herbicide application. Specific treatment is based on local permissions, land ownership, regulation, and need. Line ROWs are treated on a cycle-basis so treatment is conducted to accomplish specific vegetation spacing from lines that will hold to minimum distances over the entire course of the cycle. For example, if the minimum clearance spacing is 10 feet from a conductor, arborist-certified APS pre-inspectors might specify an 18-foot clearance in the case of vegetation which grows 2 feet per year which would ensure a 10-foot clearance still exists at the time of next treatment.

3.2.1 Distribution Vegetation Inspections and Work Planning

Pre-inspection vegetation line patrols for high fire risk distribution feeders are completed on a three- or four-year cycle depending on vegetation growth rates, type, and location. After an

inspection is completed for a given feeder, cycle lengths are reviewed for that feeder and adjustments are considered if necessary. Vegetation is identified as needing pruning, needing to be removed, or requiring herbicide treatment to maintain ROW clearance and reliability. Designation depends on land ownership, the owner’s desires, species of vegetation, its location, the feasibility of any given treatment method, and other determining factors that would necessitate maintenance. Work is documented in the Mobile Vegetation Management application (MVM) and then disseminated to contractors for completion. Post-inspections of the work are conducted by APS personnel to ensure proper treatment was applied and vegetation clearance distances are achieved.

The following table lists the current distribution feeder cycle lengths in each APS district:

District	Cycle Length
Cochise	3 or 4 years depending on vegetation growth rate for each feeder
Coconino	3 years for all feeders
Metro	3 years for all feeders
Mountain	3 or 4 years depending on vegetation growth rate for each feeder
Navajo	3 years for all feeders
Payson	3 years for all feeders
Pinal	4 years for all feeders
Prescott	3 years for all feeders
Verde	3 years for all feeders
Wickenburg	3 years for all feeders

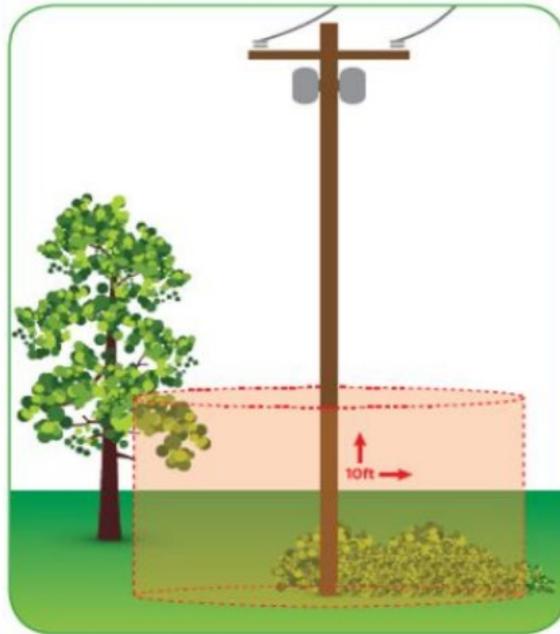
3.2.2 Transmission Vegetation Inspections and Work Planning

Pre-inspection vegetation line patrols for transmission are completed on a one- to five-year cycle depending on vegetation growth rates, locations, fire risk, and forestry action thresholds to meet vegetation clearance objectives. After an inspection is completed for a given transmission line, cycle lengths are reviewed for that line and adjustments are considered if necessary. Vegetation is identified as needing pruning, needing to be removed, or requiring herbicide treatment to maintain ROW clearance and reliability. Designation depends on land ownership, the owner’s desires, species of vegetation, its location, the feasibility of any given treatment method, and other determining factors that would necessitate maintenance. Work is documented in the MVM and then disseminated to contractors for completion. Post-inspections

of the work are conducted by APS personnel to ensure proper treatment was applied and vegetation clearance distances are achieved.

3.3 DEFENSIBLE SPACE AROUND POLES (DSAP)

The Defensible Space Around Poles (DSAP) program is a proactive fire mitigation strategy to reduce fuels around utility equipment poles. Equipment poles are defined as those poles that have any APS electric utility equipment beyond wire attachments, such as transformers, fuses, arrestors, switches, regulators, or capacitors. At the time of treatment, above ground vegetation should be reduced a minimum of ten feet in all directions (10 foot radius cylinder, 10 feet high) to create a defensible space, unless an exception applies.



All DSAP work is done in consultation with the appropriate landowner and documented in the APS DSAP GIS Work Profile, electronically. Some exceptions to why complete removal may not be completed may include, but is not limited to, the following: ornamental grasses or shrubs, irrigated maintained areas, sentimental plantings, no herbicide requested by the landowner, or urbanized areas surrounded by concrete/asphalt. DSAP activities must be completed in compliance with and consistent with environmental permits (e.g. Endangered Species Act, NEPA, Arizona Native Plant Law). This in some cases will prohibit the use of herbicide or removal of vegetation/combustibles and degrade the ability to discourage regrowth in the prescribed cycle. The DSAP treatment is not intended to eliminate all risk, but to reduce risk of fire impact in the treated area. DSAP occurs on all equipment poles in FRI 3+ annually.

3.4 HAZARD TREE REMOVAL

The Hazard Tree program’s goal is to identify and remove hazard vegetation outside APS’s ROWs and easements. Hazard vegetation is defined as a tree, vegetation, or a portion of a tree or plant (e.g., limb) that could contact a power line, structure or equipment and cause an electrical fault

if that vegetation were to die off and fail. Trees can be considered hazardous if they exhibit an external structural defect that increases the chances of them failing and contacting electric utility infrastructure.

The following two methods are used for detecting this vegetation:

The first is a cycle-based inspection that targets line sections across high fire risk areas of the APS service territory during the mid-point of their normal cycle-based vegetation management period (as described in Section 3.2). These line sections are inspected for tree strike potential based on tree height, distance from the line, health of the tree, and any visual structural defects such as those caused by lightning strikes, fires, or wind breakage. Trees that are in an unhealthy state are identified for removal.

The second is a reactive inspection conducted following recent wildfire (or prescribed burn) activity in high fire risk areas of the APS service territory also referred to as post-fire patrol. Unhealthy trees with strike potential (same criteria as above) are identified for removal.

All vegetation identified for removal is prioritized into one of the two following buckets:

- Emergent – these trees are intended to be worked within 48 hours due to imminent failure and risk to APS lines.
- Normal Work – these trees are intended to be placed into the workplan for the year in which they're identified if that identification occurs before fourth quarter or placed in the workplan for the following year if identified after the start of fourth quarter.

Certified Tree Risk Assessment Qualified (TRAQ) arborists are solely utilized for the inspection and identification of hazard vegetation, and a minimum of 50% of hazard tree removals are reviewed as part of QA/QC checks.

3.5 SUBSTATION VEGETATION MANAGEMENT

Substation vegetation management has two components: internal management of vegetation inside the substation and external landscape maintenance.

Internal, bare ground is achieved with herbicide application annually for vegetation mitigation to create bare grounds. This shall include the entire area of the substation inside the perimeter of the furthest fence, wall or barrier. For pedestal/pole mounted substations, areas under the equipment should be cleared of any vegetation and a defensible space around the poles should be cleared up to a ten-foot perimeter provided land ownership consideration for coordination.

External landscape maintenance is achieved with substations being pre-inspected twice a year. The first inspection occurs within the months of January – June and the second inspection occurs within the months of July – December, documented in the MVM. Pre-inspection of the vegetation includes identifying needed pruning, removal and herbicide application.

3.6 UTILITY-OWNED RENEWABLE ENERGY RESOURCE SITES

APS owned and operated renewable energy and battery sites are treated annually with herbicide to create bare ground. The treatment area includes the entire area inside the perimeter of the furthest fence, wall, or barrier and driveways entering the sites. Sites adjacent to other landscaped properties are treated outside the fence within at least a five-foot buffer with products that should not cause harm to landscape plants.

3.7 LiDAR CAPTURE

On an as needed basis, APS conducts flights to gather aerial photography and Light Detection and Ranging (LiDAR) data along some select electrical supply lines. LiDAR collects information regarding the vegetation along and adjacent to the power line ROWs. It provides precise data on power line structures and locations, models topography using elevation contours, and identifies vegetation encroachment. The data is evaluated, ground-verified, and used for validating the planning of vegetation and line maintenance work. LiDAR is used as a secondary tool to supplement the annual, scheduled patrols for our transmission and distribution system and is conducted on an as needed basis, when deemed appropriate.

4 GRID HARDENING

Grid hardening is the implementation of technologies to help prevent and mitigate the effect of fires on the distribution system. In addition, to support this effort, members of the APS T&D Engineering group survey the market annually and review and evaluate technologies that may have the ability to prevent sources of ignition along utility corridors and minimize the impact of fire on the system. APS assesses for potential inclusion in future CWMPs identified technologies that are compatible with APS's system and have the potential to mitigate the effects of fire on the distribution system.

4.1 RECLOSER UPGRADES

Reclosers are key electrical system protective devices on the grid which protect the grid from overloads and other faults. A retrofit program is currently in progress consisting of three parts:

- Upgrades to existing device protective settings
- Upgrades to existing reclosing devices
 - Replacing existing oil-filled devices with vacuum-operated devices, reducing the potential of system to ground ignition
 - Upgrading existing vacuum-operated devices with new technology that provides increased protection and coordination under fault conditions
 - Implementing additional radios and communications equipment to ensure remote SCADA capability
- Installation of new reclosers to eliminate a protection or coordination risk, or increase segmentation benefits under a fault event

The specific work done at each location is dictated by engineering studies which are conducted on each high fire risk feeder. The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2024 cumulative end of year: 40% of HFR feeders
- 2025 cumulative end of year: 88% of HFR feeders
- 2026 cumulative end of year: all HFR feeders complete

4.2 LINE FUSE REPLACEMENT

Link break expulsion fuses, typically found on overhead distribution lines, use an appropriately sized fusible link housed within a fuse tube to protect equipment and facilities from surge and overload conditions. When these expulsion fuses operate, the fusible link breaks, and hot gases and particles are vented out of the fuse tube.

Alternative fusing options, referred to as expulsion limiting fuses (ELF) are now being used in high fire risk areas which significantly reduce the expulsion of hot particles during operation. They achieve this using a muffler/exhaust system that traps and contains hot particles or use different materials to rapidly quench the arc generated during operation. These fusing options can be used to protect overhead transformers, transitions and feeder laterals. A multi-year

program is underway to replace all link break expulsion line fuses in high fire risk areas with expulsion limiting fuses. The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2024 cumulative end of year: 32% of HFR feeders
- 2025 cumulative end of year: 60% of HFR feeders
- 2026 cumulative end of year: at least 75% of HFR feeders
- 2027 cumulative end of year: all HFR feeders complete

4.3 SURGE ARRESTER & EQUIPMENT FUSE REPLACEMENT

Overhead surge arresters are used to protect overhead equipment, distribution lines and facilities. Under normal conditions, they offer a high impedance path to ground. However, during surge current conditions, they allow a low impedance path to ground to shunt the surge away and protect nearby facilities. Under significant overload events, or as they approach end of life, the surge arrester may shed hot particles when the ground lead disconnecter operates or if the internal metal oxide varistor (MOV) block fails.

To address this, a surge arrester designed for use in high fire risk areas was approved as a suitable alternative to APS's standard construction in late 2025. These arresters utilize a fully contained disconnecter between the ground lead and the arrester body itself. This disconnecter is designed to safely disconnect the ground lead without shedding sparks and to prevent the MOV block from failing catastrophically under significant surge events. A multi-year retrofit program will kick off in early 2026 to replace existing surge arresters on high fire risk feeders with these newer designs. The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2026 cumulative end of year: at least 1% of HFR feeders
- 2027 cumulative end of year: at least 5% of HFR feeders
- 2028 cumulative end of year: at least 15% of HFR feeders
- 2029 cumulative end of year: at least 25% of HFR feeders
- 2030 cumulative end of year: at least 35% of HFR feeders
- 2031 cumulative end of year: at least 45% of HFR feeders
- 2032 cumulative end of year: at least 55% of HFR feeders
- 2033 cumulative end of year: at least 65% of HFR feeders

4.4 LINE SPLICE RETROFIT

Starting in 2026, APS plans to begin a program to inspect and retrofit old-style autosplices with compression splices on its highest fire risk feeders (FRI 4+). Autosplices have a potential for failure over time that could cause a line to contact the ground or other combustible material. Locating these splices and swapping them out will take time and resources so the following schedule is currently planned with feeders being addressed in highest to lowest risk priority.

- 2026 cumulative end of year: 5% of FRI 4+ feeders
- 2027 cumulative end of year: at least 15% of FRI 4+ feeders

- 2028 cumulative end of year: at least 27% of FRI 4+ feeders
- 2029 cumulative end of year: at least 39% of FRI 4+ feeders
- 2030 cumulative end of year: at least 50% of FRI 4+ feeders

4.5 WOOD POLE TESTING AND REPLACEMENT

APS has wood pole infrastructure throughout the wildland urban interface. The purpose of the Wood Pole Replacement program is to foster and improve system reliability through regular inspections and maintenance, including total replacement of the wood poles. Failures of these poles can interrupt service to customers, present a public safety hazard, and result in costly emergency repairs. In recognition of these risks, Section 6 of the National Electric Safety Code requires utilities to regularly inspect and maintain the poles in their system.

Wood pole testing is required to ensure the integrity of the internal pole structure and enhance system reliability. The National Electric Safety Code requires that utilities replace structures in which the strength has declined below 66% of the original design value. APS uses 70% of the original design strength for its replacement criteria. Wood poles are inspected for deterioration due to rot, decay or insect damage. In addition, wood poles are tested for remaining strength. Beginning in 2025, APS is working on moving all poles in high fire risk areas to a 20-year cycle for testing. This switch in cycle length is expected to be completed by the end of 2031 due to the number of poles to be tested to bring them up to a 20-year cycle.

When a wood pole is found to be compromised beyond repair, it will be replaced. The APS standard is to replace the pole with a steel pole in high fire risk areas except where this cannot be done because of vehicle accessibility. In those cases, a fire wrapped (see below) wood pole should be used. Barring any permitting delays beyond APS's control, all poles are intended to be replaced within 120 days of being identified as compromised.

4.6 WOOD POLE FIRE WRAP

APS has begun implementing wood pole fire wrapping on new wood poles installed in high fire risk areas. This pole wrap is a galvanized steel mesh that is impregnated with an intumescent carbon coating. When the coating is exposed to heat, it expands, filling the voids in the mesh and creating an insulating barrier which greatly reduces the chance for ignition. The mesh is completely wrapped around wood poles from slightly below grade up to a specified height, depending on the prevalent fuels and fire conditions in the area. Once the coating is activated and expanded, the insulating barrier it creates around the pole protects the pole from further exposure to heat, embers, and hot particles.

4.7 WILDLIFE GUARDS

Bird guards and wildlife protection devices are used to reduce the risk of wildlife contacting nearby surfaces of different voltage potentials. If contact is made, a fault could occur – leading to potential outages, damage to equipment, animal fatalities, and system to ground ignitions. The APS Avian and Wildlife Protection program provides industry standards companywide on understanding and mitigating the risk potential for these incidents. Bird guard covers and

devices are used on transmission and distribution lines, as well as inside of substations. Some examples of these would be phase covers, vice top covers, wildlife discs, arrestor and bushing covers, flight diverters and anti-perch caps. Some of these protective covers have also shown success in minimizing incidents due to vegetation or mylar balloons.

The Avian and Wildlife Protection program also installs nesting platforms on APS poles to encourage nesting birds to build on these rather than directly on equipment. These platforms reduce the chances of avian caused fires and outages caused by nesting substrate reaching into our equipment and going phase to phase. Another avian mitigation tool is the installation of avian perches that allow birds to safely sit above APS equipment.

APS continues to adopt the use of wildlife protection on transmission, distribution and substation facilities and to seek out wildlife protection solutions for hardware that currently does not have an approved wildlife guard. To support this, wildlife guards from various manufacturers are being evaluated and tested on different accessories by APS Standards and Engineering and members of APS System Health. Any identified wildlife guards that are proven to demonstrate fire mitigation benefits and that applies to, and is compatible with, APS's system and service territory will be considered for inclusion in the APS Avian and Wildlife Protection program in future years.

4.8 COVERED CONDUCTOR

Covered, or jacketed, conductor, also known as tree wire, can be used for overhead distribution facilities to help minimize the risk of wildlife, vegetation, and foreign object contact between lines. However, covered conductor poses new challenges in constructability and maintainability due to different tooling and hardware needs as well as work practices. Both de-energized and energized evaluations are being conducted by APS from a performance, constructability and maintainability standpoint. APS's current plan is to conclude the evaluation of this technology by the end of 2026 and then make the decision on if or how this may be used going forward.

4.9 UNDERGROUND CONDUCTOR

APS evaluates the use of underground conductor when it is feasible and necessary for safety or system reliability and when it would be consistent with regulatory guidelines. There are many parts of the APS service territory where this form of service is not feasible due to traversing areas of solid rock, archaeological sites, protected ecosystems, and other federal or state regulatory restrictions. Undergrounding conductor is also considerably more expensive than running cable overhead and that cost may not be warranted given the other mitigation efforts APS utilizes. There are limited cases, however, where constructing underground conductor may make sense and APS will assess and implement as appropriate.

4.10 TRANSMISSION TOWER MAINTENANCE AND REPLACEMENT

This entails a structure-by-structure inspection of all transmission lines, assessing and repairing each structure as needed. Identified remediations may include insulator replacements,

structural component replacements, and hardware tightening. Each structure's inspection is on a seven-year cycle utilizing a comprehensive aerial inspection or a climbing inspection process.

5 ASSET INSPECTION

5.1 PRE-SEASON ELEVATED FIRE CONDITIONS LINE PATROLS

Distribution system inspections are performed annually prior to May 1st, which APS defines as the beginning of its highest fire risk time of the year, on all high fire risk feeders. Any equipment anomalies which represent an increased fire risk are identified, documented, and prioritized for correction. Patrols include identifying combustible materials or vegetation that has been planted or regrown between normal vegetation management cycle work and must be removed because it is in close proximity (within 10') to an electric line and equipment anomalies such as damaged poles, crossarms, and insulators that could provide a potential for failure.

Vegetation removal is referred to the forestry department for mitigation, and for any equipment work, a work order is created in the work management system after performing a risk assessment of the conditions found and is assigned one of the following priorities:

- Priority 1 – identified work should be completed immediately.
- Priority 2 – identified work should be completed no later than two weeks from reported date.
- Priority 3 – identified work should be completed no later than 30 days from reported date.
- Priority 4 – the condition is not a wildfire threat and is placed in a queue for eventual work to be completed not later than the end of the fourth quarter of the following year from the reported date.

5.2 TRANSMISSION SYSTEM INSPECTION

Transmission system public safety line patrols are completed on an annual cycle starting in January with a completion date of May 1st. These patrols are a high-level visual patrol looking for potential issues such as floating statics/phases, broken or splintered arms, guy wire or leaning poles/structures prior to summer storms/fire season. They are started in the southern part of the state and work north to complete the northern half after the winter storms, preferably. These patrols are completed by helicopter where possible, driving, and sometimes hiking.

On steel poles and structures in the metro area, drones are used for both the public safety line patrols and climbing inspections with a lineman's review.

5.3 INFRARED SCANS

Infrared cameras are used in certain situations when necessary to spot hot areas of equipment. This technology can assist in giving another indication of pending failure. This technology is used when line inspectors deem it necessary based on what they see in the field. Areas of interest found with these scans are then targeted for further review and potential replacement.

5.4 DRONE USE

Unmanned aerial systems, or drones, are used in some inspections where inspectors desire an overhead or closer view of particular equipment. This inspection technique is used when line inspectors deem it necessary based on what they see in the field. Drone captured images are reviewed and anomalies are scheduled for maintenance or replacement.

6 MONITORING AND AWARENESS

6.1 METEOROLOGY AND FIRE SCIENCE

Consideration of several weather elements and their importance across the APS enterprise is essential. Weather awareness requires an understanding of how weather elements affect the various roles and scope of activities across the enterprise. For wildfire mitigation, the potential for critical fire weather is crucial, with careful consideration of temperatures, winds, moisture, precipitation, thunderstorms, lightning, sky conditions, winter weather, and other elements as needed. Changes in short-term weather trends are often subtle and difficult to detect, but even a slight departure from normal can have significant implications on daily fire weather concerns and fire danger. Three weather regimes are known to exacerbate fire weather conditions: Meridional Ridge – Southwest Flow pattern, Short-Wave Train pattern, and the Zonal Ridge pattern. The fire danger peaks when a shortwave trough passes over or slightly to the north of the region. This occurs every spring and fall when Arizona is typically dry and windy. However, critical fire weather can occur any time of year in Arizona.

6.1.1 Meteorological Forecasts

Meteorology at APS considers wildfire mitigation throughout the calendar year and provides a multitude of weather support and intel related products across the enterprise. This includes the issuance of semi-weekly atmospheric and fire weather briefings which discuss weather conditions pertaining to the next seven days. The briefings contain a high-level synoptic weather overview, a summary of primary weather hazards and impacts, routine forecast graphics, links to original forecast documents, and an internal weather support webpage. At times, business operations may require detailed short-term weather support to be prioritized. Examples of support include spot forecasting, nowcasting, weather radar analysis, and current weather observations.

Planning forecasts provided include the following:

- **Locality Forecast** – Tabular forecast depicting general ranges and trends for temperatures, winds, precipitation, and other broad weather implications on circuits by APS districts; issued semiweekly
- **Fire Weather Impacts Outlook** – Tabular forecast depicting daily potential for occurrence of critical fire weather conditions including a fire weather narrative and fire weather elements forecast, along with the potential for Red Flag Alerts; issued semiweekly
- **Thunderstorm Impacts Outlook** – Tabular forecast depicting daily potential for occurrence of thunderstorm hazards and impacts including a thunderstorm narrative forecast and daily potential for thunderstorm-related hazards and possible impacts; issued semiweekly
- **Snow and Ice Impacts Outlook** – Tabular forecast depicting daily potential for snow and ice hazards and impacts including a narrative and potential for wintry hazards and possible impacts; issued semiweekly during the cool months

- **Temperature Impacts Outlook** – Tabular forecast depicting daily potential for anomalously warm or cold temperatures including a narrative of the daily potential for temperature-related hazards and possible impacts
- **Wind Impacts Outlook** – Tabular forecast depicting daily potential for large scale wind event hazards and impacts including a narrative and potential for wind-driven hazards and possible impacts; issued semiweekly
- **Daily scratch forecast** – Graphical forecast depicting short-term weather updates during volatile weather regimes; issued daily when inclement weather hazards are imminent or could possibly impact the APS enterprise and is uploaded to the SharePoint site
- **Seasonal outlooks and reviews** – Narrative discussion of seasonal precipitation and temperatures including an analysis of recent conditions and/or probability forecast maps of precipitation and temperatures over a certain timeframe; frequency of issuance varies
- **Spot forecasts** – Circuit-level forecasts of specific weather elements supporting the APS enterprise

6.1.2 Weather Outlook and Situational Awareness Dashboard

The Weather Outlook and Situational Awareness Dashboard (WOSAD) is an Esri, Inc. dashboard containing several publicly available weather observations, analyses, and outlooks to provide additional top-level weather support as needed. All products are produced, shared, and managed by the National Oceanic and Atmospheric Administration (NOAA) and National Weather Service (NWS) for public use. Only the WOSAD display is managed by Wildfire Mitigation Meteorology. The WOSAD also provides access to NOAA radar and several NOAA weather forecasts, outlooks and observations.

6.1.3 Fire Science Analytics and Indices

APS has greatly expanded its capabilities in the realm of fire science and analytics. The creation of additional positions and the onboarding of specialized personnel with unique skillsets has enabled the company to better identify those environmental factors impacting fire risk in its service territory. Several indices have been created to quantify and better communicate this risk. These indices have greatly assisted decision making on grid investment and mitigation measures. The following major indices allow the APS Wildfire Mitigation Team to make data driven decisions.

6.1.3.1 Wind Peak & Duration Index (WPDI)

The Wind Peak & Duration Index is one of three indices taken into account when forecasting for a potential Public Safety Power Shutoff (PSPS) event or EPSS activation.

- **Wind gust peak**- The peak wind gusts forecasted during a wind event. Each of the APS districts currently in the Public Safety Power Shutoff program have wind speed thresholds that have been researched based on climatology. A 1 through 5 scale is used to weigh the intensity of the threshold for each district.
- **Wind gust duration**- The wind gust peak is forecasted for a minimum of 3 hours for a PSPS to be considered.

The WPDI is translated to a score of 1-5 (1 = least risk, 5 = most significant risk) based on a raw score dictated by wind speed over a minimum 3-hour period. The following thresholds are currently in use but may change based on environmental and field conditions.

WPDI Score	All Districts
1	<=20
2	21 – 30
3	31 – 40
4	41 – 50
5	51+

The translated 1-5 score is then used as an input into the forecast for a PSPS or EPSS activation.

6.1.3.2 Fire Growth Index (FGI)

The Fire Growth Index (FGI) combines the Burning Index (BI) and Wind Gusts (WG). This tool converts environmental, statistical, and scientific data into an easily understood forecast of the short-term fire threat that could exist for different geographical areas in the APS service territory. This index is one of the three indices taken into account when forecasting for a potential PSPS event or EPSS activation.

The FGI is translated to a score of 1-5 (1 = least risk, 5 = most significant risk) based on a raw score dictated by the three input components. The following thresholds are currently in use but may change based on environmental and field conditions.

FGI Score	All Districts
1	0-249.99
2	250-499.99
3	500-749.99
4	750-1049.99
5	>1050

The translated 1-5 score is then used as an input into the forecast for a PSPS or EPSS activation.

6.1.3.3 Fire Potential Index, (FPI)

The Fire Potential Index (FPI) quantifies the fire activity potential over the territory based on different parameters including fuels, terrain and weather. This index is provided by Technosylva Wildfire Analyst (WFA) and is one of three indices taken into consideration when forecasting for a potential PSPS event or EPSS activation.

FPI is made up of the following components:

- **FPI Raw (FPIR)** serves as the foundational metric, predicting fire activity and rate of spread through the integration of the environmental variables described below. FPIR

6.2 TECHNOSYLVA WILDFIRE ANALYST

Wildfire Analyst (WFA) tool from Technosylva is used for on-demand wildfire spread prediction and risk forecasting based on different scenarios and data inputs. Fuels data and weather prediction data are integrated into the fire model for the development of hourly risk forecasts.

Using the fire simulation integration tool, WFA allows the APS Fire Mitigation Team (FMT) to predict on-demand wildfire spread days in advance, for confirmed or active wildfire incidents. WFA also allows for various scenario planning activities and simulations to facilitate proactive planning for anticipated impacts to APS's system.

WFA allows users to integrate weather and fuels data forecasting for up to 4 days in advance, providing intel for future conditions that affect fire spread. WFA also allows decision makers to look at data and science-based scenarios to support operational actions for de-energization, resource allocation, and preparedness. Using tools through WFA, lines can be isolated to show locations of greatest concern to infrastructure from wildfire impacts such as devices, poles, equipment, fuel loads, and population.

Integrating decades of historical weather data into the WFA model gives decision makers and meteorologists a greater understanding of storm risk and weather influences on APS's system year-round. APS outage data related to storms, unplanned events, and wildfires is incorporated into the WFA model to demonstrate risk in relation to system-to-ground ignitions (STG), ground-to-system (GTS) impacts, and proactive planning for wildfire impacts. Also, third-party data integrated into the WFA model can include fuel loads in and around infrastructure, current and historical incidents, weather stations, cameras, and aerial and satellite (MODIS and VIIRS) capabilities.

6.3 WEATHER STATIONS

Weather stations are mounted on poles and around other APS equipment to provide real-time weather observations, since publicly available weather data is not locationally specific to APS equipment. The observations from these weather stations provide the Fire Mitigation Team with the ability to monitor what weather conditions are impacting APS equipment in near real-time. This provides the ability to inform the Duty Officer (DO), Incident Command, APS meteorology, and other decision makers regarding ongoing hazardous weather conditions to the APS system. The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2024 cumulative end of year: 56 stations
- 2025 cumulative end of year: 137 stations
- 2026 cumulative end of year: at least 200 stations
- 2027 cumulative end of year: at least 250 stations

6.4 CAMERA SYSTEMS

6.4.1 Pan-Tilt-Zoom (PTZ) Cameras

A network of pan-tilt-zoom (PTZ) cameras and weather stations are in place to better understand potential wildfire risks that can impact APS infrastructure. The cameras are intended for the Fire Mitigation Team to gather situational awareness with regards to wildfires and infrastructure. The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2024 cumulative end of year: 30 cameras
- 2025 cumulative end of year: 82 cameras
- 2026 cumulative end of year: at least 145 cameras
- 2027 cumulative end of year: at least 215 cameras

6.4.2 AI Cameras

AI Camera Technology is focused on early wildfire detection with AI cameras that have 360-degree viewsheds of lands in APS service territory. APS AI camera technology leverages advanced hardware, software, and artificial intelligence to modernize the rapid detection and response to wildfire, preparedness and response. The cameras provide risk reduction of catastrophic ignitions in the following areas:

- **Wildfire Detection:** AI Cameras use ultra-high-definition cameras and deep learning AI to detect, verify, and classify wildfire events in real-time
- **Rapid Response:** The system provides real-time alerts and images to fire monitoring professionals, helping them respond quickly and accurately to potential threats
- **Integrated Platform:** Cameras combine data from various sources, including satellite data, field sensors, and emergency alerts, to offer a comprehensive view of wildfire activity
- **Climate Resilience:** By enabling faster detection and response, AI cameras aim to reduce the impact of wildfires, protecting lives, property, and natural resources

The current schedule for deployment, which is subject to change based on material and resource availability, is:

- 2024 cumulative end of year: 13 cameras
- 2025 cumulative end of year: 31 cameras
- 2026 cumulative end of year: at least 65 cameras

7 OPERATIONAL MITIGATIONS

7.1 PREPAREDNESS LEVEL PROTOCOLS

The following gives operational work restrictions and protocols based on the APS PLs. This includes the associated work requirements and potential impacts on work plans. This is not all-inclusive, and additional requirements may be needed to meet the standard of exemptions by publicly managed land agencies in Arizona. The APS Land Services Department and Wildfire Mitigation Team may need to secure and facilitate exemptions from publicly managed land agencies to perform emergent work in the event of Elevated and Extreme fire conditions. Each APS district is assigned a PL and APS employees and contractors are responsible for knowing the current PL and requirements for the district in which they are working. APS employees, and contractors acting on behalf of APS, are responsible for meeting all the requirements currently in effect for the area they are working in.

Preparedness Level – 1 Normal Operating Conditions

Low fire conditions.

- No industrial plan requirements
- Maintain situational awareness

Preparedness Level – 2 Industrial Plan A

Increasing fire conditions, increasing awareness and preparation.

- Wildfire mitigation tools must be present on all APS-owned T&D and T&D field contractor vehicles and job sites – the purpose of the tools are: 1) mitigate fire potential by removing fuels with hand tool and/or wetting area, and 2) extinguish an incipient fire if within the capability of the individual
 - For all passenger-type and SUV-type vehicles:
 - 1 – 10# ABC fire extinguisher
 - For all truck-type (including pickup, line, bucket, etc.) and UTV-type vehicles, all of the following:
 - 2 – 10# ABC fire extinguishers
 - 1 backpack pump
 - 5 gallons minimum of additional water
 - at least 1 hand tool (round point shovel)
- Personnel must have access to a dependable form of communication (cell phone, satellite phone, or radio) that gives the user communications capability within a thirty (30) minute timeframe (allowing for travel time to a network coverage area)
- Review Wildfire CPR (Call, Plan, Respond) during pre-job briefs
- No fire guard required; should be considered

Preparedness Level – 3 Industrial Plan B

Elevated Fire Conditions.

- Wildfire mitigation tools must be present on all APS-owned T&D and T&D field contractor vehicles and job sites – the purpose of the tools are: 1) mitigate fire potential by removing fuels with hand tool and/or wetting area, and 2) extinguish an incipient fire if within the capability of the individual
 - For all passenger-type and SUV-type vehicles:
 - 1 – 10# ABC fire extinguisher
 - For all truck-type (including pickup, line, bucket, etc.) and UTV-type vehicles, all of the following:
 - 2 – 10# ABC fire extinguishers
 - 1 backpack pump
 - 5 gallons minimum of additional water
 - at least 1 hand tool (round point shovel)
- Personnel must have access to a dependable form of communication (cell phone, satellite phone, or radio) that gives the user communications capability within a thirty (30) minute timeframe (allowing for travel time to a network coverage area)
- Review Wildfire CPR during pre-job briefs
- Fire guard required on all job sites
- No-Reclose Strategy (NRS) enacted
- No smoking
- Restrictions and closures may influence work plans

Preparedness Level – 4 Industrial Plan C

Very high fire conditions.

- Wildfire mitigation tools must be present on all APS-owned T&D and T&D field contractor vehicles and job sites – the purpose of the tools are: 1) mitigate fire potential by removing fuels with hand tool and/or wetting area, and 2) extinguish an incipient fire if within the capability of the individual
 - For all passenger-type and SUV-type vehicles:
 - 1 – 10# ABC fire extinguisher
 - For all truck-type (including pickup, line, bucket, etc.) and UTV-type vehicles, all of the following:
 - 2 – 10# ABC fire extinguishers
 - 1 backpack pump
 - 5 gallons minimum of additional water
 - at least 1 hand tool (round point shovel)
- Personnel must have access to a dependable form of communication (cell phone, satellite phone, or radio) that gives the user communications capability within a thirty (30) minute timeframe (allowing for travel time to a network coverage area)
- Fire guard required on job sites
- Emergent work as necessary

- Pre-Emergent work shall be completed prior to 0900 hours and/or resume at 2000 hours
- During both Emergent and pre-emergent work, every effort shall be made to give crew locations to the DOC for tracking purposes
- All other work shall stop until approval is obtained by T&D leadership during the Work Approval Review Meeting (WARM) and APS Land Services Department approval where applicable.
- Review wildfire CPR during pre-job briefs
- No-Reclose Strategy (NRS) enacted
- No smoking
- Restrictions and closures may influence work plans

Preparedness Level – 5 Industrial Plan D

Extreme fire conditions.

- Wildfire mitigation tools must be present on all APS-owned T&D and T&D field contractor vehicles and job sites – the purpose of the tools are: 1) mitigate fire potential by removing fuels with hand tool and/or wetting area, and 2) extinguish an incipient fire if within the capability of the individual
 - For all passenger-type and SUV-type vehicles:
 - 1 – 10# ABC fire extinguisher
 - For all truck-type (including pickup, line, bucket, etc.) and UTV-type vehicles, all of the following:
 - 2 – 10# ABC fire extinguishers
 - 1 backpack pump
 - 5 gallons minimum of additional water
 - at least 1 hand tool (round point shovel)
- Personnel must have access to a dependable form of communication (cell phone, satellite phone, or radio) that gives the user communications capability within a thirty (30) minute timeframe (allowing for travel time to a network coverage area)
- Fire guard required on job sites
- Emergent work as necessary
- With pre-approval, specific operations may continue with additional mitigation measures in place and approval from APS management and the Fire Mitigation Team during the Work Approval Review Meeting (WARM) and the APS Land Services Department approval where applicable.
- During both emergent and pre-emergent work, every effort shall be made to give crew locations to the DOC for tracking purposes
- Review Wildfire CPR during pre-job briefs
- No-Reclose Strategy (NRS) enacted
- Restrictions and closures may influence work plans
- No smoking

7.1.1 Preparedness Level Work Type Definitions

APS recognizes in times of extreme fire conditions, measures need to be put in place to protect Arizona’s natural resources and infrastructure, including public safety and national security interests. APS supports measures implemented to protect Arizona’s forests, rangelands and water ways such as restrictions and closures. During these times, APS increases situational awareness and support to prevent fire ignitions. To provide safe and reliable electricity, there is a constant need for emergent and pre-emergent work that must be completed every day to maintain safe grid operation.

What is “pre-emergent” work?

Work that shall be completed because of an operational situation that poses a threat to the safety and reliability of the grid in the immediate future.

Example (not limited to, or exclusive to, the following):

A broken crossarm needs to be replaced before a wire contacts the ground, causing a fault or any potentially unsafe conditions to the electric grid.

What is “emergent” work?

Work that shall be completed because of an operational situation currently posing a threat to the safety and reliability of the grid.

Example (not limited to, or exclusive to, the following):

Wire on the ground or any equipment issues that could result in unsafe conditions or service to the electric grid.

All work will be evaluated during the Work Approval Review Meeting (WARM) for additional mitigation measures including, but not limited to, the following:

- Additional fire guard measures taken
- Work plan and project adjustment
- Contractor work plan moved or shutdown
- Increased communications to the public and stakeholders
- One point of contact with APS fire mitigation staff
- Check in check out protocol with publicly managed lands

The WARM occurs when any area of APS’s service territory is in PL 4 or PL 5 and consists of representatives from the Fire Mitigation Team, Transmission and Distribution Leadership, and others as necessary. This meeting also serves as an opportunity to determine the priority of work and additional mitigation measures required to continue operation of the grid.

7.2 FIRE GUARD REQUIREMENT

A fire guard is a requirement during certain APS PLs. The intention of a fire guard is to mitigate the accidental ignition of fuels and the spread of fire due to the industrial nature of our work. Embers can smolder for some time without igniting, which is why it is important to provide a fire guard. The fire guard is not dependent on land ownership and is required whether work is occurring on agency or private land throughout the state. While the restriction originates from the Forest Service, APS has adopted it across the entire service territory during PL 3 and greater.

- A fire guard is required when in PLs 3-5 and during Red Flag Alerts. Both APS and contract crews shall utilize a fire guard in these conditions.
- An additional 20 gallons of water is required for the fire guard on top of the required five gallons specified with the wildfire mitigation tools in PL 2 and above. A total of 25 gallons of water is required on site with the fire guard.

A fire guard consists of:

- Three hours of continual watch after any work that potentially could have created an ignition source is complete, such as welding, cutting, grinding, or sparks produced by APS equipment
- A fire guard can be provided by any APS employee or contractor who has the proper fire tools and the ability to act if necessary
- When providing a fire guard, fire tools shall be within easy reach and in close proximity
- No traveling or parking off established roads and avoid idling engines
- Make sure the undercarriage and exhaust of vehicles are devoid of vegetation
- Create a safe space to set hot saws and other equipment down in your work site, per APS Accident Prevention Manual (APM)
- No smoking

When to use and not use a fire guard:

- Work activity creates a spark, i.e., welding, cutting, grinding, or sparks are produced by APS equipment. (Three hours of continual watch after the above type of work is completed)
- If you are on private property in a Wildland Urban Interface (WUI)/populated area and the landscape is irrigated and boxed in by concrete and asphalt or sand and rock, your risk of ignition is mitigated, and a fire guard is not needed
- A fire guard is not necessary in restricted or closure areas if the purpose and work performed in that area has not caused/created a concern for potential ignition
- If you are on the outskirts of a downtown/populated area on private property and the landscape looks just like the agency land on the other side of the fence, a fire guard shall be provided

7.3 NO-RECLOSE STRATEGY (NRS)

System faults can be temporary in nature, such as when a mylar balloon contacts a line. Other faults are sustained, such as wire on the ground or a tarp in the line. During normal system operation, some protection devices (i.e., feeder breakers, reclosers, trip savers) reclose shortly after an outage, attempting to automatically re-energize customers. This reclosing mechanism helps improve electric reliability for APS's customers by testing if the fault was temporary or sustained. If the fault was sustained, the line will trip out of service again. If the fault is temporary, the protection device is programmed to reclose after seconds, re-energizing the line and restoring power to the affected customers.

During high fire risk periods (P3 or higher), reclosing is disabled on protective devices in high fire risk areas to prevent the testing of a line until a line patrol (visual inspection) can be completed to ensure there are no wires on the ground or other visual indication that energizing the line won't cause sparking.

During this period, APS field personnel should analyze additional system data and perform more foot patrols and inspections to help identify potential hazards before de-energized lines are re-energized. APS has proactively implemented these protocols and line patrols to help mitigate the risk of wildfires being caused by downed conductors or damaged equipment.

The APS Fire Mitigation Specialist (FMS) is responsible for notifying the Distribution Operations Center (DOC), the Energy Control Center (ECC), and Construction and Maintenance departments statewide of work restrictions. The DOC and ECC will implement testing and reclose protocols. Testing of any distribution line section relayed shall be reported by circuit immediately to the APS FMS. Transmission line sections included in the No-Reclose Strategy are reported via email from the ECC transmission systems log to the APS FMS. The following operational settings and protocols apply during elevated fire conditions.

The APS No-Reclose Strategy in high-risk areas has been implemented to protect the public and the communities we serve. While these measures may result in outages for customers fed by certain high-risk feeders, it also helps mitigate the potential risk of wildfires.

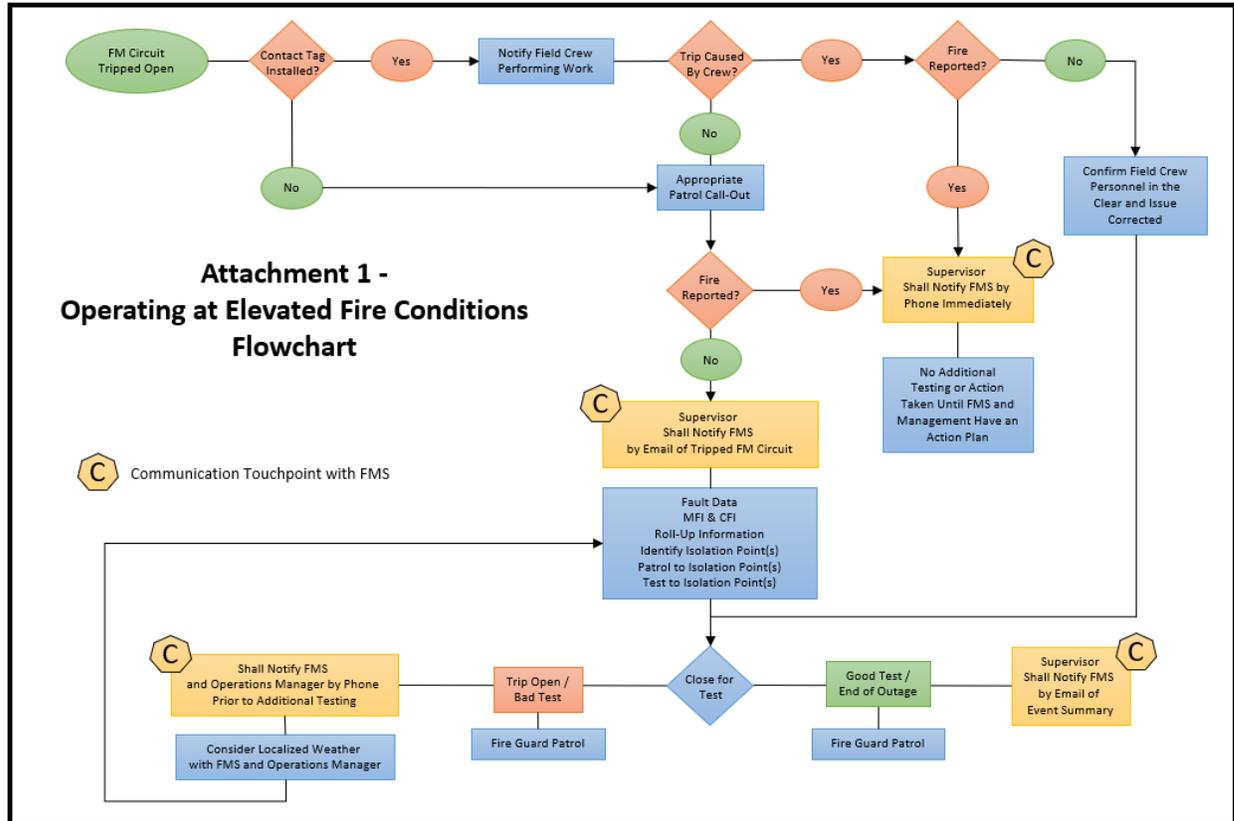


Figure 6 - Workflow for DOC and ECC during No-Reclose Strategy (NRS)

7.4 AGENCY LAND RESTRICTIONS AND CLOSURES

During elevated fire conditions, fire restrictions and closures may be enacted on agency lands, including federal, state, and tribal lands. These are determined by state and federal fire management officers and land managers during the evaluation of weather conditions, fuels measurements, and historical fire data among others. This is outlined in the Southwest Interagency Fire Restrictions and Closure Operating Plan. The intent of these guidelines is to facilitate interagency collaboration during the implementation of fire restrictions, closures, and/or rescissions, and to provide consistent, coordinated fire restriction messaging to the public. The guidelines also provide direction for the southwest area agency’s administrators, tribal leaders, and fire staff to develop and implement fire restrictions and closures.

The impact this has on utility work can vary by the level of restrictions and industrial plan designation as outlined in the state and federal guidelines. During restrictions and/or closures, the APS Fire Mitigation Team (FMT) coordinates with the land managers to review and ensure compliance with the current restrictions. APS FMT participates in weekly Fire Restriction Zone calls (Northern, Central-West, Southeastern, and White Mountain) to ensure the current APS District PL is meeting or exceeding the agency guidelines during elevated fire conditions. The APS CWMP is evaluated annually by Land Managers, and exemptions are determined based on mitigation measures outlined in the APS CWMP.

7.5 RED FLAG ALERTS

APS has adopted a procedure in which additional precautions are put in place during conditions of heightened fire risk based on environmental conditions. These conditions are defined as a critical combination of dry fuels and weather conditions that support extreme fire behavior and are indicated by the issuance of a Red Flag Alert by the APS meteorologists. While the conditions for National Weather Service issued Red Flag Warnings may align with those APS also monitors for issuing Red Flag Alerts, APS utilizes more localized data to issue Red Flag Alerts specifically in those areas of the APS service territory that have the increased risk and Red Flag Alerts may or may not align with Red Flag Warnings. APS meteorology will issue Red Flag Alerts by APS district or circuit and will specify the timeframe the alert is in effect.

A Red Flag Alert is generally called during the following conditions occurring simultaneously for three or more hours across any portion of a fire weather zone or APS district:

- 1) 20-foot winds sustained 20 mph or greater, or gusting to 35 mph or greater
- 2) Relative humidity of 15% or lower
- 3) National Wildfire Danger Rating System, (NFDRS) fire danger rating of “High” or higher

When a Red Flag Alert is issued, the following measures shall be taken for the entire time period specified in the alert notification email within the Red Flag Alert-affected area(s):

- All vehicles shall have all PL 2-equivalent wildfire mitigation tools as specified for the vehicle type.
- All Non-emergent Field Work (includes Pre-emergent Field Work and Planned Field Work) is expected to cease prior to the start of the Red Flag Alert timeframe or be deferred until after the Red Flag Alert timeframe has expired.
- Emergent Field Work can occur with notification from the maintenance department to T&D Leadership including the local Manager and Fire Mitigation and must include a fire watch for 3 hours post-completion of the work.
- DOC Operations or ECC Operations shall notify the Wildfire Mitigation Duty Officer of any line trip or recloser operation. If there is a known line down or fire reported, the Wildfire Mitigation Duty Officer will be notified immediately.
- Any line trip resulting in an open circuit shall have a complete line patrol completed before closing for a test.

Red Flag Alerts will be communicated via email from the Fire Mitigation Team to the following distribution lists:

- Fire Notification
- DOC Shift Supervisors
- ECC Shift Supervisors
- T&D Leadership

7.6 ENHANCED POWERLINE SAFETY SETTINGS

APS completed a pilot of Enhanced Powerline Safety Settings, also known as fast-curve relaying, in 2025. This mitigation technique involves increasing the sensitivity of electrical system protective devices, such as relays, and at the same time lowering their trip time. This makes these devices more likely to trip off and those trips will occur faster when an anomaly is sensed on the line. Those settings then produce less potential for arcing and fire ignition. The use of this operational mitigation may result in an increase in the number and duration of outages for customers on these feeders when EPSS is active. In order to implement this program, each feeder will need to be modified to enable these settings. In some cases, this will include settings changes and in others, replacement of current equipment with this capability. This program will begin production rollout starting in 2026 and, when complete, is expected to cover the highest fire risk feeders (FRI 4+). APS will work through several feeders per year, making the necessary changes, and readying those feeders to be utilized on EPSS. Feeders are expected to be addressed in highest to lowest risk priority based on the following plan.

- 2026 cumulative end of year: 5% of FRI 4+ feeders
- 2027 cumulative end of year: at least 15% of FRI 4+ feeders
- 2028 cumulative end of year: at least 27% of FRI 4+ feeders
- 2029 cumulative end of year: at least 39% of FRI 4+ feeders
- 2030 cumulative end of year: at least 50% of FRI 4+ feeders

Once a feeder is equipped for EPSS, it will be added to the program and that setting will be able to be used if conditions warrant. EPSS for a given feeder will be activated based on similar criteria to PSPS, but at a lower trigger point. These indices, FGI, WPDI, and FPI which are detailed in Section 6.1.3 - Fire Science Analytics and Indices above, are averaged to calculate an EPSS activation score for each circuit in the EPSS program. An activation score of greater than 4.0 indicates EPSS should be activated. When that occurs, the Fire Mitigation team will notify distribution operations to activate EPSS on the specific feeder(s). Those settings should remain in effect as long as fire risk conditions remain high enough. Once conditions have improved, the Fire Mitigation team will notify distribution operations to reset the feeder(s) to their normal relay settings; thereby deactivating EPSS.

If any feeder trips while on EPSS, field personnel will conduct a line patrol prior to re-energizing the line.

7.7 PUBLIC SAFETY POWER SHUTOFF

A Public Safety Power Shutoff (PSPS) is defined as the temporary shutoff of electric service within specific areas when extreme weather and other environmental conditions create a highly elevated fire risk. It serves to prevent wildfire ignition from tree strikes, downed wires, equipment failures, or other events exacerbated by adverse environmental conditions.

APS has many tools in our wildfire mitigation toolkit that reduce risk while causing minimal disruption to our customers, including widespread grid modernization, distribution system hardening, feeder coordination studies, the hazard tree risk assessment program, the defensible

space around poles program, and others. We rely on all these tools first and only use a PSPS when the conditions in certain areas of our system warrant this intervention.

If APS needs to initiate a PSPS, efforts are made to limit the number of customers affected and the amount of time they are without power. APS will keep customers and key stakeholders informed about what to expect before and during a PSPS by communicating across a wide range of channels, such as text, email, phone, media, and website. Following a PSPS event, APS reviews internal and external feedback and available data to inform potential changes to the PSPS program. The following sections detail: our preparations and operations for PSPS events, communication with key stakeholders and customers regarding PSPS, procedures APS follows during a PSPS event, and actions taken by APS following a PSPS event.

7.7.1 PSPS Preparedness and Operations Overview

7.7.1.1 PSPS Line Selection Criteria

APS distribution feeders with an FRI of 4.5+ and specific sub-transmission lines which have the same customer footprint as the distribution lines and do not adversely impact the Bulk Electric System as regulated by the FERC in high-risk areas are included in the PSPS program. These feeders are located throughout northern and central Arizona in Coconino, Gila, Navajo, and Yavapai counties. By May of 2026, APS will have 122 distribution feeders in its PSPS program which are listed in Appendix 1 – PSPS Distribution Feeders. Maps of current areas included in the PSPS program can be found at: aps.com/psps.

These APS lines are monitored throughout the year for potential Public Safety Power Shutoffs. As the threat of wildfire increases and environmental conditions evolve, we expect the program to expand to include additional lines in the future as determined through an ongoing evaluation process that includes the following:

- **Historical fire impact** (e.g., historical data of wildfire activity across the state)
- **Historical system-to-ground activity** (e.g., data on fires that have been started by electrical systems)
- **Age of infrastructure** (e.g., data on age, condition, and material make-up of infrastructure)
- **Historical weather patterns** (e.g., data on the 200+ worst weather days in the APS service territory with correlations to other data and metrics listed above)
- **Historical wind gusts** (e.g., data on wind patterns and high-risk areas)

7.7.1.2 PSPS Decision Factors

De-energization protocols are managed by a collaboration of the APS Fire Mitigation Team (FMT) and Transmission & Distribution Incident Command Center (TDICC) alongside the Distribution Operations Center (DOC) and Energy Control Center (ECC) operations teams. The decision to preemptively de-energize a feeder requires consideration of many complex factors, including:

- Ongoing assessments from APS Fire Mitigation Specialists, fire science analysts, and Meteorologists informed by weather models, data from strategically positioned APS

weather stations (e.g., wind speeds), and modeling software (e.g., Fire Potential Index). [Note: Additional details regarding this factor are included below].

- Real-time situational awareness information (e.g., burn index) obtained from weather station data and, in some instances, field observers positioned locally in extremely high fire risk areas. [Note: Additional details regarding this factor are included below].

Environmental conditions considered include the following:

- Fuel complexity
- Fuel moisture
- Terrain
- Active fires
- Wind speed and gusting
- Snow mask
- Probability and speed of fire spread

Three indices are used to determine the potential for a PSPS. These are detailed in Section 6.1.3 - Fire Science Analytics and Indices in this document, and are the FGI, WPDI, and FPI. These indices are averaged to calculate a PSPS activation score for each circuit in the PSPS program. A PSPS activation score of greater than 4.6 indicates a potential PSPS, which triggers the steps described in PSPS Activation and Monitoring High Level Flow below.

7.7.1.3 PSPS Activation and Monitoring High Level Flow

If the environmental thresholds are met to call a PSPS, the event will follow this general order:

1. At first indication of a potential PSPS event, APS engages with public safety partners (e.g., emergency management) and begins initial preparations and readiness procedures for the possibility of a PSPS if conditions continue to escalate. APS meteorology and fire science staff continue to monitor and update forecasts.
2. Once the PSPS event seems likely (typically 4 days out if possible), APS notifies a wide range of stakeholders, impacted customers, and community members that may be affected if a PSPS is called. APS meteorology and fire science staff continue to monitor and update forecasts.
3. On the day of the event, the Fire Mitigation Team and APS meteorologists assess real-time environmental conditions and recommend a course of action to the Chief Operating Officer, or his or her designee, who will make the final decision on PSPS execution.
4. Approximately 1-2 hours before the projected start of the severe weather conditions, APS de-energizes the affected PSPS areas and APS field crews adjust equipment to help prepare the system to be re-energized when it is safe to do so.
5. While weather conditions remain at a high-risk level, APS continues communication with customers and communities impacted by the PSPS, while facilitating collaboration between APS field crews, local authorities, and community organizations. Meanwhile, the Fire Mitigation Team and Meteorologists continue to monitor grid and environmental conditions.

6. Once the environmental conditions have passed, field crews conduct patrols of lines that were de-energized. After they have finalized their assessments, and made any needed repairs, power is safely restored to customers.
7. Once affected feeders and customers are fully restored to normal conditions, APS continues to monitor the area for further action if necessary.

Detailed information regarding the notification and communication with stakeholders, customers, and community members is included in the Outreach and Communication section, below.

7.7.2 Outreach and Communication

7.7.2.1 Coordination with Public Safety Partners, Communities, and Customers

The PSPS customer journey is informed by our pre-fire season customer outreach program, industry best practices, as well as our own communications and customer experience learnings. APS aims to keep partners, communities, and customers informed, as appropriate, regarding PSPS events before, during, and after such events. To the extent possible, APS provides PSPS-impacted customers with information about the PSPS program, the reasons for PSPS program implementation, expected impacts, and in-event updates, to the extent practicable.

APS intends to continuously improve and iterate on outreach initiatives based on customer feedback and the evolution of underlying technologies.

7.7.2.1.1 Customer Outreach

Outreach and coordination with customers are segmented into four time periods: pre-elevated fire conditions, days preceding a potential PSPS event, the day of a PSPS event, and following a PSPS event.

- Pre-fire season (February through May):
 - Audience: All customers on PSPS-affected feeders
 - Frequency: Multiple broader wildfire mitigation messages, in addition to one PSPS-specific informational broadcast before fire season
 - Purpose: Inform customers of the PSPS program, encourage customers to register and update their contact information, and explain what customers need to do to prepare
 - Communication methods*: A combination of direct mail, email (if available), digital ads, social ads, radio, newspaper, website, regional media, and public meetings (Arizona Corporation Commission, county boards of supervisors, town and city councils)
- Days preceding potential PSPS event:
 - Audience: Impacted customers
 - Frequency: Once daily for up to four days leading up to the expected PSPS event in the normal case, otherwise each day leading up to the event that is available in the case of an event which comes up more quickly

- Purpose: Notify specific customers of fire conditions which may necessitate a PSPS in their area on a specific date
- Communication methods*: Text, email, phone, website, media
- Day(s) of PPS event:
 - Audience: Impacted customers
 - Frequency: One to four hours prior to shutoff, dependent on time of day, and then each day the event continues
 - Purpose: Notify customers of impending or continuing PPS event, as well as timeline for expected restoration and additional resources for information or assistance (e.g., APS website and phone number)
 - Communication methods*: A combination of text, email, phone, website, targeted social media, outage map, media
- Cancellation of PPS event
 - Audience: Impacted customers
 - Frequency: In the event of PPS event cancellation
 - Purpose: Notify customers of PPS event cancellation
 - Communication methods*: Text, email, phone, website, media
- After PPS event:
 - Audience: Impacted customers
 - Frequency: Once when power is restored, and once in the following day(s)
 - Purpose: Announce completion of PPS event and provide additional resources for customers to provide feedback or seek help if still experiencing outages
 - Communication methods*: Text, email, phone, website, outage map, call-backs

*Note: APS attempts to contact each impacted customer via up to two forms of communication through the various stages of an event. APS prioritizes text first as the most immediate form of communication, email second, and phone-call/dialer third. APS will also provide updates through its website and outage map, as available, before and during PPS events. If only one method of contact is available for a customer, that method will be used. APS will also provide updates on its website and outage map, as available, before and during PPS events. APS also has a 24/7 Customer Care Center for customers who would like to speak with an advisor to answer questions and receive information.

7.7.2.1.2 Community and Public Safety Partners Outreach

APS has focused on educating our community partners on the PPS program. APS has initiated communication and continues to collaborate and interface with the following stakeholder and community groups regarding the PPS program:

- Arizona Corporation Commission
- State Government (including the Governor’s Office of Resiliency, the Governor’s Energy Policy Advisor, the Department of Emergency and Military Affairs, Legislative Districts 1,

6, and 7, the Chairs of the House and Senate Committee for Natural Resources Energy and Water)

- Local Government (including county level authorities and emergency managers in Yavapai, Coconino, Navajo, and Gila counties, and city and town officials in Flagstaff and other towns across northern Arizona)
- Media (local news stations and papers, as well as news releases, feature stories, and interviews with reporters)

Outreach and coordination with community partners, public safety partners, local agencies, and charitable organizations are spearheaded by APS regional Public Affairs Managers (PAMs) among other APS representatives. PAMs work directly with community partners and county emergency managers to communicate daily throughout the full timeline of a PSPS event. As part of this close coordination, counties and the Red Cross, on a case-by-case basis, intend to activate relief centers and/or shelters if an event is planned for 8+ hours. APS provides ice reimbursement to affected APS customers and delivers dry ice, or wet/bagged ice if no dry ice is available, to a PSPS event area 24 hours in advance of the outage.

7.7.2.2 Support for Special Audiences and Critical Customers

APS takes additional steps to identify and reach out to critical customers, including medical facilities, schools, and important infrastructure. APS has reached out to key accounts and critical customers about the PSPS program and broader APS wildfire mitigation efforts by providing information on how to prepare for power outages, including communications related to safety measures and emergency needs. In addition to the above customer outreach, key accounts and identified critical customers are notified directly by their assigned APS Account Manager or designee.

7.7.2.3 Support for Vulnerable Populations

APS takes additional steps to reach out to vulnerable customers, including outreach encouraging medically sensitive or elderly customers to self-identify to emergency management agencies and APS in advance of a fire emergency or PSPS event. APS makes additional efforts to attempt to notify vulnerable customers who depend on electricity for medical equipment. The APS [Medical Care Program](#) (MCP) sends advanced communications to relevant customers to help them prepare for PSPS events. This includes information on how to prepare for an outage and how to register with emergency management resources in their area.

APS's Medical Care Program is for customers who have a household member with a life-threatening illness or use critical medical equipment that requires electricity that has been verified by a licensed medical professional and registered and certified annually with APS.

In the event a PSPS is going to be called, Medical Care Program customers receive outreach daily from APS in the form of a live phone call in addition to the MCP customer outreach efforts preceding the PSPS event. If the customer needs to relocate during the event, the extra lead time and outreach for MCP customers should allow enough time to arrange special transportation that can accommodate medical equipment through an outside caregiver, local organization, or medical transport.

7.7.2.4 Frequently Asked Questions

In anticipation of concerns from customers, APS has put together a list of FAQs and corresponding answers provided through the APS website (aps.com/pssp) and other communication channels. The FAQ addresses general inquiries regarding PSPS, concerns on customer impact, concerns on PSPS duration and frequency, and other topics.

7.7.3 PSPS Event Coordination and Operations

In the event of a PSPS, APS has developed a series of procedures to ensure key customer and stakeholder communication, channels to facilitate coordination with local agencies and community partners, and patrol plans to safely re-energize the affected areas as quickly as possible.

7.7.3.1 Coordination with Local Agencies

In the event of a PSPS, APS proactively engages local emergency managers and public safety agencies. APS regional Public Affairs Managers (PAMs) notify county emergency managers and communicate with them continuously in the days leading up to and during a PSPS event. APS also provides advance notifications to the Red Cross. APS will work closely with county-level authorities and the Red Cross to support the establishment and activation of relief centers and/or shelters.

APS also collaborates directly with fire agencies, emergency operations centers, and other stakeholders throughout the PSPS timeline. APS has an established Fire Mitigation Specialist (FMS) role that coordinates wildfire mitigation strategies broadly and serves as a point of contact for agency partners, fire personnel, and emergency managers during elevated fire conditions and PSPS events.

7.7.3.2 De-energization Plan for Affected Areas

APS has developed a comprehensive plan to de-energize electric lines and equipment in the event of a PSPS. This plan involves the coordination of various APS personnel and resources before and during a PSPS event. An overview of the plan is included below:

7.7.3.2.1 Prior to De-energization

1. **Initial Coordination and Planning:** Before de-energizing a feeder, the APS Fire Mitigation Team (FMT) collaborates with the Energy Control Center (ECC), Distribution Operations Center (DOC), and field teams to plan de-energization. This involves deciding the steps to safely shut down power in the affected area and determining the impact on specific customers and the broader system.
2. **Advance Notification and Setup:** As soon as the FMT determines that a PSPS event seems likely—typically four days in advance—they instruct the Distribution Field Planner (DFP) to review prewritten switching orders for the appropriate feeders. The switching orders are pre-defined for each of the PSPS feeders.
3. **Resource Staging:** Field teams are positioned strategically based on a detailed PSPS Patrol Plan to ensure readiness for immediate action once a PSPS is confirmed.

7.7.3.2.2 *Execution of De-energization*

1. **Execution of Switching Orders:** Following the FMT's directive, the operations teams at the DOC and ECC execute the switching orders, aligning with the prepared field resources to ensure coordinated de-energization. Field resources confirm proper shutoff of field devices.
2. **System Management:** The ECC and DOC teams follow established procedures to minimize the number of affected customers by sectionalizing the impacted feeders.

7.7.3.3 *Patrol and Re-Energization Plan for Affected Areas*

When a PSPS event is called, APS mobilizes field resources and dispatches patrol crews to monitor the affected feeder areas and infrastructure. The patrol crews follow pre-developed patrol plans, which outline a number of activities to ensure grid integrity and facilitate timely re-energization of the feeders. These include:

- Visually inspecting grid infrastructure
- Identifying areas susceptible to fire ignition
- Communicating any additional necessary actions to the relevant parties (e.g., communicating with the Vegetation Management Team in case of plant overgrowth)

APS has developed a separate, comprehensive Patrol Plan for each of the PSPS feeders covered in the PSPS program. The plans include:

- A map of the feeder in question (and the surrounding area)
- Overview of vehicles, personnel, and other resources required
- Positioning, timing, and logistics for all personnel involved in the patrol
- Information on the number of customers (including medical) and key accounts in the affected area
- Estimated time of the patrol

These Patrol Plans follow the format outlined by the Incident Command System (ICS) 201 form used by the Federal Emergency Management Agency (FEMA). These standardized forms ensure that all involved agencies and personnel are familiar with their format and use, which facilitates a coordinated response.

Once the environmental conditions which necessitated the PSPS event have passed, the steps in the following subsections are executed.

7.7.3.3.1 *Patrol and Repair*

1. **Line Patrol:** Before re-energization, a thorough patrol of the power lines is conducted to ensure they are safe to re-energize.
2. **Repair:** Should any system components require repair, the appropriate crews will be immediately dispatched to repair or replace those components

7.7.3.3.2 *Re-energization*

1. **Power Restoration:** Once the FMT gives the all-clear, the operations team re-energizes the affected feeders using the designated breakers or devices. Sectionalization is used wherever possible to speed restoration.
2. **Safety Checks:** Should any component trip upon re-energization, a repeat patrol is undertaken to ensure no underlying issues remain that could pose risks.
3. **Documentation:** The FMT, ECC, and DOC supervisors complete all necessary reports and logs to document actions taken during the PSPS and to gather insights for improving future responses.

7.7.4 **Post-PSPS Event Procedures and Operations**

7.7.4.1 *Reporting*

APS follows reporting protocols to document and evaluate each PSPS event. These may include, but are not limited to:

- System impact reports
- Necessary reports or filings with regulatory bodies or agencies
- Internal review reports and processes

APS intends to regularly update our reporting practices to ensure they meet both regulatory standards and our internal goals for continuous improvement and operational excellence.

7.7.4.2 *Customer and Stakeholder Follow-up*

Following a PSPS event, APS plans to engage with customers and community stakeholders to gather feedback and provide updates. These may include, but are not limited to:

- Customer surveys and interviews
- Community debriefs, town halls, or other live events
- Ongoing collaboration with agencies and key customers
- Public reports and press releases
- Press conferences
- Additional direct outreach and communication (via email, website, and/or mail)

APS is committed to deepening our engagement with customers and stakeholders after each PSPS event. We intend to enhance our feedback mechanisms and strengthen our community relationships to build trust and ensure that our programs align with community needs and expectations.

7.7.4.3 *PSPS Program Improvement and Iteration*

APS intends to use stakeholder feedback and internal review processes to continuously update and refine the PSPS program. These iteration plans may include, but are not restricted to:

- Operational adjustments (e.g., improved communication strategies and timelines)

- Improvements in training and development (e.g., event simulations or drills, training programs for PSPS responders, etc.)
- Enhanced monitoring and data analysis (e.g., improved monitoring and prediction tools, enhanced data collection, etc.)

APS plans to continuously evolve the PSPS program by integrating additional innovative technologies and strategies, and by listening to customer feedback to minimize PSPS impacts and enhance our overall wildfire mitigation efforts. Maps of current areas included in the PSPS program can be found at: aps.com/psps.

8 WILDFIRE INCIDENT RESPONSE

8.1 WILDFIRE CALL, PLAN, AND RESPOND (CPR)

Wildfire Call, Plan, and Respond is the protocol APS employees and contractors are to follow in the event they encounter a wildfire. The protocol is centered on calling and reporting the incident, planning for the worst-case scenario, and responding appropriately. A description of the process is listed in the below figure. This protocol is to be reviewed during pre-job briefings when in PL 2 and greater, ensuring all field workers are aware of the process.

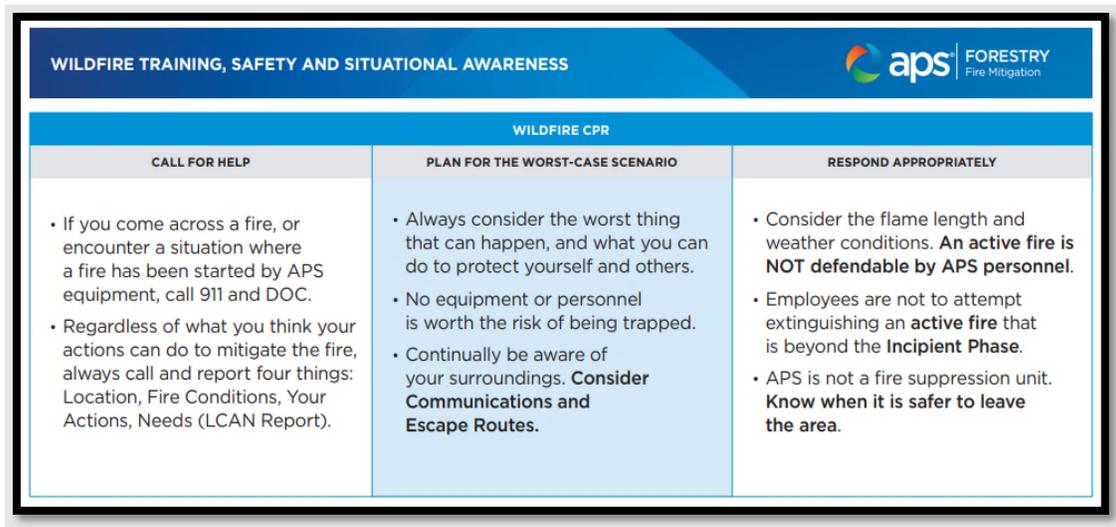


Figure 7 - Wildfire CPR diagram

8.2 WILDFIRE AWARENESS DASHBOARD

The APS Wildfire Awareness Dashboard is used to plot and track all current wildfire incidents in the state of Arizona with information populated from Arizona Fire Dispatch Centers and is updated as incidents develop. This information provides real-time analysis of the potential impact to the APS system and situational awareness to APS employees and contractors working in the field. The dashboard allows APS operations to make informed decisions on the wildfire risk to any aspect of the APS grid or support systems. The APS Wildfire Awareness Dashboard also contains real-time weather station data, radar, and lightning strike data to assist with informed decision making. The current APS Wildfire Mitigation Duty Officer (DO) is listed on the dashboard and updated daily.

As reports come from the dispatch centers, the DO determines the threat level of each incident. Threat levels are as follows:

- **For Information Only:** No threat currently associated with this incident. DO is currently monitoring and smoke may be visible
- **Potential Threat:** Elevated fire conditions warrant DO engagement with fire resources and fire may have potential for growth towards APS assets
- **Credible Threat:** Within 10 miles and greater likelihood to impact APS infrastructure

- **Immediate Threat:** Imminent impact to APS infrastructure

Impacts include but are not limited to: may burn into ROW, may cause an outage, may require a patrol, may burn down poles/towers, may require response, and smoke impacts.

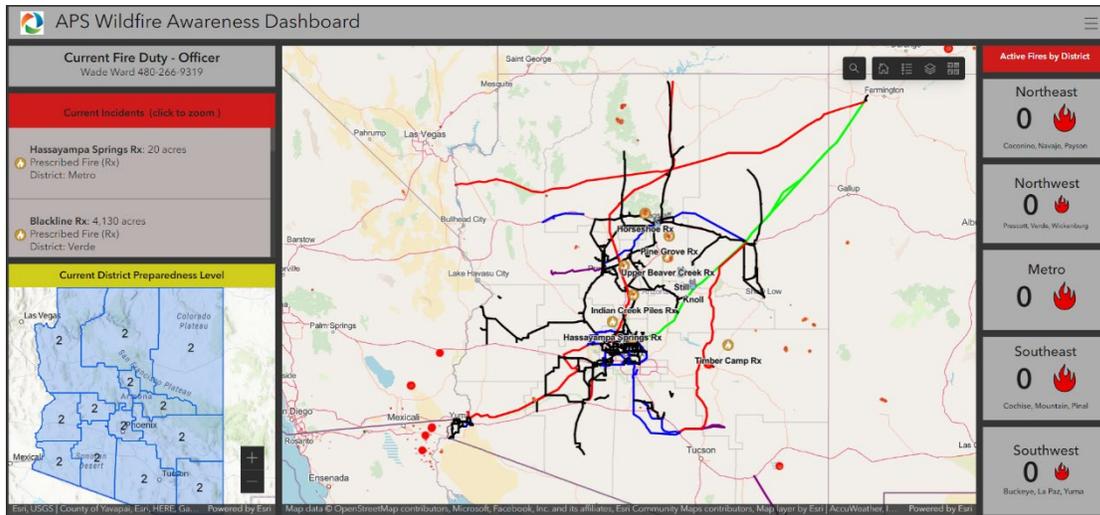


Figure 8 - Example of APS Wildfire Awareness Dashboard

8.3 TRACKING AND ANALYSIS OF STG AND GTS

The tracking and analysis of system to ground (STG) ignitions and impacts from ground to system (GTS) fires remains a priority in assessing wildfire risk to the APS system. The mitigation of STG ignitions is an ongoing process that leverages all 5 of the pillars of the program. The Fire Mitigation Team (FMT) collects data and tracks all STGs from the beginning to end of year. The ADMS provides a tool for the FMT to find detailed information directly from crews on outages or incidents requiring an APS response. From this information, a report with pictures is created and sent to the System Health and Standards Department to discuss potential solutions and improvements.

GTS fires that have the potential to affect the system are tracked and anticipated to mitigate impacts. The APS Wildfire Awareness Dashboard visualizes and tracks potential impacts of wildland fires, including prescribed burns. In cooperation with city, state and regional dispatch centers, the FMT receives notifications sent through text messages on any initial reports of a fire or burn in the state of Arizona. From this information and other tools, the FMT internally maps and monitors active fires for potential impact to APS’s system. The impacts are then documented, tracked and analyzed for better improvements to reduce the impact of wildland fire on APS. Direct communication with DOC, FMT and fire resources is necessary to gather real-time information for better determination of the risk involved and potential mitigation measures.

8.4 EMERGENCY MANAGEMENT AND FIRE RESPONSE

Our APS commitment is to provide a resilient infrastructure to meet the needs of the community, customers, and employees through an all-hazards approach focusing our efforts on mitigation, preparedness, response, and recovery. APS emergency management establishes the framework to prepare for and respond to all hazards, both natural and man-made, in the APS service area. The process is designed to be flexible and scalable to respond to any type and size of disaster. Preparedness is a strategic approach to ensuring employees are equipped to respond to emergencies that may occur in the workplace. To provide basic actionable information, our team has put together resources each department can use to determine what information they need in order to respond to an emergency at one of our APS facilities.

This process incorporates the National Incident Management System (NIMS) and the Incident Command System (ICS) into the general approach toward responding to emergencies. NIMS is a system that provides a consistent nationwide approach for federal, state, and local governments and private industry to work effectively and efficiently together to prepare for, respond to, and recover from domestic incidents, regardless of cause, size, or complexity. ICS is a standardized incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of any single incident or multiple incidents without being hindered by jurisdictional boundaries. The “Planning P” outline provides a consistent rhythm and structure to incident management with a set cadence for meetings and communication. In the Tactics meeting, key players review the proposed tactics developed by the Operations Section and conduct planning for resource assignments to ensure safe and timely service restoration.

This process provides the guidelines necessary to coordinate Transmission and Distribution emergency management activities with APS districts, divisions, and the Corporate Emergency Operations Center (CEOC).

Additional efforts are made in the participation in Community Wildfire Protection Plans (CWPP) and ROW Annual Meetings. The Maricopa County Community Wildfire Protection Plan requires an annual meeting between APS and SRP to mutually identify locations of needed vegetative treatments within ROW in high-risk areas of the Wildland Urban Interface (WUI) and support the core team in obtaining grants and agreements necessary to implement vegetative fuel reduction projects adjacent to ROW.

8.4.1 Emergency Operations and Incident Command

The Incident Command System (ICS) is a standardized approach to the command, control and coordination of emergency response and provides a common hierarchy to allow responders from multiple agencies to be effective. APS has adopted the use of ICS during response to a wildfire incident.

In the event of a wildfire, firefighting agencies will use ICS to manage firefighting efforts, APS will stand up its own team using the ICS organization to coordinate the response and actions taken by APS. In order to maintain communication and coordinate efforts between the two

organizations, APS integrates into the ICS organization on the fire in the form of a Liaison. The Liaison is a single person point-of-contact who works with fire personnel to coordinate efforts between fire crews and APS crews. This close coordination provides safer working conditions for both firefighters and APS crews and also leads to faster incident stabilization and power restoration.

Following an emergency event, a debrief will be conducted. Additional After-Action meetings may be scheduled as well as deemed necessary by the Emergency Manager or Incident Command Center (ICC) Director.

8.4.2 Restoration Procedures Following Wildfire

In the event of a wildfire that impacts APS facilities, an FMS will be assigned to liaison with first responders. Once the FMS has been given the “all clear” to enter an area by fire incident command and any necessary investigation and evidence preservation activities have been completed, APS field personnel will survey the damage and, working within the incident command structure, proceed to restore the system to its pre-event state. Just like in any other outage event, precedence is given to restoring customer power. This may include routing power to customers in an outage area utilizing alternative infrastructure where available. Reconstructing damaged lines and equipment is conducted in the same way as damage caused by storm activity. APS also participates in a utility mutual assistance program which gives us the capability to call on other utilities for assistance in the event of a large-scale, destructive event.

8.5 TRAINING AND SEASONAL AWARENESS

At APS, we believe the overall situational awareness of the company and its appropriately trained workforce can be the first line of defense against wildfires. The APS Wildfire PLs describe the conditions under which the threat of fire is increased, and the field practices and resources which are implemented as conditions increase. These changes affect work rules and equipment that must be with field crews. The wildfire mitigation training program is a computer-based class that is taken by all Transmission & Distribution personnel once per year. It includes content based on APS’s processes and procedures for high fire risk periods.

8.5.1 Wildfire Mitigation Forum

Each year, the APS Fire Mitigation Team conducts an annual internal forum to discuss, collaborate, and share the latest mitigation efforts and seasonal outlooks throughout Transmission, Distribution and Communications. The forum is used to bring together internal stakeholders to discuss improvement, as well as share successes from the past year regarding wildfire mitigation efforts. In addition to the annual forum, seasonal preparation meetings begin early in the year with anticipation of elevated fire conditions and to drive preparation and mitigation measures for both operational efforts and programs to reduce risk and create a better customer experience.

8.5.2 APS Contractor Requirements

All APS contract crews shall meet all expectations during elevated fire conditions for safe operations. APS contractors shall adhere to all work restrictions and requirements outlined in this CWMP. When the current and expected fire weather conditions warrant elevating the district PLs to PL 4 or PL 5, all work is evaluated and prioritized based on pre-emergent and emergent only.

All APS contractors shall provide some form of prompt and reliable direct communication, such as a cell phone or two-way radio, between the fire guard(s) and the work crews, and between the crew's operations and APS Supervisor. In an emergency, activate the emergency system by calling 911 and the APS project lead, as an additional resource, a list of the Publicly Managed Land Dispatch numbers has been provided on the contacts page at the end of the CWMP.

All crews working in Publicly Managed Lands (PML) during PL 4 and PL 5 must check in with APS project lead and provide GPS location each morning before starting work.

8.6 COMMUNITY OUTREACH AND PUBLIC COMMUNICATION

A variety of measures are taken to support information flow to customers when a wildfire incident occurs that may cause prolonged outages. Depending on the outage, some of these steps include:

- Sending automatic outage alerts through email or text message to customers
- Communicating directly with specific commercial customers
- Contacting and checking in with medically monitored customers per guidelines
- Updating the APS Outage Map with timely information
- Contacting customers with outage information through the dialer system
- Providing customers an automated phone system to report outages and receive updates

During extended outages, APS may provide additional notices containing information about resources, along with regular updates. Customers receiving alerts will be directed to the APS Outage Map for more information. Additionally, specific customer communications are conducted whenever a PSPS is called, and these are detailed in Section 7.7.2 - Outreach and Communication.

In addition, the Wildfire Mitigation Communication plan helps establish APS as a trusted community partner, educate customers about our fire prevention efforts to maintain reliable service, inform them about potentially prolonged outages ahead of a wildfire, and encourage them to take preparedness action. The APS External Communications and Public Affairs teams partner to develop and implement several communications tactics such as the following:

- Conduct outreach to elected officials and stakeholders, present messaging to city councils, fire chiefs and agencies, and distribute outreach material.
- Deploy a seasonal bilingual campaign in English and Spanish from April to September that provides customers with timely updates and preparedness information in the form of emails, postcards, bill messages, social media, the APS website, and newsletters.

- Develop unique TV, radio and print news pitches and partner with news organizations to distribute important preparedness tips and information about APS’s fire preparedness efforts and find opportunities to collaborate with leaders in Arizona’s fire community.
- Produce videos and develop website and social media content to engage customers in information online.

8.7 STAKEHOLDER COOPERATION AND COMMUNITY ENGAGEMENT

Stakeholder cooperation and community engagement is critical to the success of APS’s wildfire mitigation plan. APS fire mitigation staff strive to develop good lines of communication and collaboration with key stakeholders and the community. APS Wildfire mitigation is integrated with state and federal resources which provide accurate and timely information on current and expected regulations and compliance. This is accomplished through relationships developed with the State Fire Marshal’s Office, State Land Office, State Forester’s Office, and federal agencies and organizations.

Fire Mitigation Specialists participate in several organizations to ensure coordination and information sharing related to wildfire mitigation and regulatory compliance. These include, but are not limited to:

- National Fire Code
- Arizona State Forester WUI Council
- Ponderosa Fire Advisory Council (PFAC) (Flagstaff)
- Four Forest Restoration Initiative (4FRI)
- Prescott Area Wildland Urban Interface Commission
- Southwest Incident Management Teams
- Yavapai County Local Emergency Planning Committee
- State Emergency Management, including all (11) counties APS serves
- Arizona Fire Chiefs Association
- USFS (WFMO) Situation/Fire Restriction calls

Among these organizations, APS participates closely with the National Cohesive Wildland Fire Management Strategy (<https://www.forestsandrangelands.gov/strategy/thestrategy.shtml>) and Arizona Fire Adapted Communities and has adopted these approaches to the APS Wildfire mitigation program from the utility perspective.

The National Strategy establishes a national vision for wildland fire management, defines three national goals, describes the wildland fire challenges, identifies opportunities to reduce wildfire risks, and establishes national priorities focused on achieving the national goals. It is a strategic push to work collaboratively among all stakeholders and across all landscapes, using best science to make meaningful progress toward the following three goals:

1. Resilient Landscapes
2. Fire Adapted Communities
3. Safe and Effective Wildfire Response

The APS Wildfire mitigation program has joined the International Wildfire Risk Mitigation Consortium (IWRMC) which is an international collaborative effort amongst electric utilities to identify and share best management practices. IWRMC and APS participation focuses on topics surrounding asset management, operations and protocols, risk management, vegetation management, data governance, and stakeholder engagement.

8.8 COOPERATION WITH SUPPRESSION AGENCIES

APS strives to create and maintain relationships with all stakeholders. These relationships begin with preseason coordination and collaboration meetings that continue throughout the year. During a wildland fire incident, the Fire Mitigation Team coordinates with the fire resources. This typically begins with communication to the authoritative dispatch center. Once an incident has been confirmed and has a potential impact to APS infrastructure, the Fire Duty Officer determines the level of APS engagement with the incident. The Fire Duty Officer may determine it necessary to provide an on-scene representation (Fire Liaison). The Fire Liaison coordinates efforts with firefighting agencies and keeps firefighter and public safety a top priority. Identifying electrical hazards and mitigation strategies to reduce impacts and restoration efforts are also part of the Fire Liaison coordination. Depending on the size and complexity of the incident, the Fire Liaison may coordinate with any or all the following Incident Management Team members: Incident Commander, Operations Section Chief or Liaison Officer. Regardless of the wildland fire incident agency, APS maintains a collaborative approach to achieve the goals of all parties.

8.8.1 Prescribed Fire Impacts to APS

Publicly managed land agencies are increasing the number of prescribed fires to meet multiple objectives including hazardous fuel reduction, wildlife habitat restoration, and watershed restoration. These prescribed fires are often conducted in wildland urban interface areas that include APS infrastructure. It is paramount for APS wildfire mitigation to work cooperatively with land management agencies to mitigate potential impacts from prescribed fire while working toward a common goal of ecological restoration. APS recognizes the need for prescribed fire treatments and fully supports implementation on the landscape with a collaborative approach.

While outcomes of prescribed fires can be beneficial in terms of reducing future wildfire threat, there are also potential impacts to APS. In terms of immediate and direct impacts during the prescribed fire, there is the potential for smoke impacting APS systems, fire encroaching the ROWs and poles, as well as limited access to equipment due to closure areas. Prolonged, indirect impacts include delayed tree mortality following a prescribed fire creating hazard trees as well as return treatments. Prescribed fire at times requires re-introduction of fire to maintain treatments and often translates to continued impact to APS systems and ROWs.

With the advancement of ecological restoration projects such as the Four Forest Restoration Initiative (4FRI) and Flagstaff Watershed Protection Project (FWPP) in combination with others, prescribed fire frequency and regularity are anticipated to increase in the future, causing an increase in potential impacts. APS wildfire mitigation is, and will continue working on, building

relationships with land management agencies. APS remains an integral shareholder of prescribed fire planning for prescribed fire practitioner safety, to reduce customer impacts and improve resiliency of the electrical grid.

9 INDUSTRY PARTICIPATION

APS participates in many industry groups in a continuous effort to stay abreast of the latest industry wildfire mitigation techniques and technologies.

International Wildfire Risk Mitigation Consortium

The International Wildfire Risk Mitigation Consortium (IWRMC) is an electric utility industry-sponsored collaborative designed to facilitate the sharing of wildfire risk mitigation insights and discovery of innovative and unique wildfire utility practices from across the globe. The organization established a vision to facilitate networking channels between members of the global utility community to support ongoing sharing of data, information, technology, practices, and proactively address the wildfire issue through learning, innovation, analysis, assessment, and collaboration. The mission is to leverage global experiences, and ideas, and to identify meaningful differences to accelerate learning, sharing and the development of new risk models and mitigation strategies. Also, the goals of expediting data collection, validation, evaluation, introducing new technology, and advancing the deployment of innovative solutions enable members to lead the industry transformation.

IWRMC Working Group discussions cover many different topics and focus areas. The six working groups cover a variety of areas of emphasis including: Asset Management, Operations and Protocols, Risk Management, Vegetation Management, Data Management, and Stakeholder Engagement. Members routinely share their experiences and help to identify industry leading practices. Occasionally, members invite leading vendors who they have worked with to share more information on the products and services they offer to improve and expedite decision making for those exploring similar options.

Some of the main initiatives and topics of exploration include:

- News and Research Web Portal updated and curated weekly with the latest wildfire/bushfire-related news, academic research, regulations, and mitigation plans from utilities around the world
- Surveys of industry peers to gather insights into the processes, methodologies, tools, and standards utilized by utilities to support their wildfire risk mitigation activities.
- Deep-dive analyses using public and/or member-contributed data and supported by UMS Group's expert analytic and modeling teams
- Case studies to communicate relevant experiences and provide lessons learned to the broader industry
- Joint development projects created to pool resources, coordinate data collection and document real-world results in the pursuit of new ideas, approaches and innovations
- New technology and tools to explore the vendor landscape, broaden the dataset of real-world experiences and utilize collective leverage to deploy new tools and technologies quickly and affordably
- Benchmarking, analysis and performance metrics are considered to better understand the APS organization's performance relative to the industry, or track progress over time to build best management practices and reduce the risk and impact of wildfire

Western Utility Group (WUG) is a collaborative organization comprised of various utility companies across the western United States. The group focuses on sharing best practices, innovative solutions, and strategic planning to enhance the efficiency and reliability of utility services. APS members regularly convene to discuss critical issues such as infrastructure development, safety protocols, and environmental sustainability. By fostering a cooperative environment, WUG and APS aims to address the unique challenges faced by utility providers in the region, ensuring the delivery of safe, reliable, and sustainable utility services to their communities.

Electric Power Research Institute (EPRI) is an independent, nonprofit organization that conducts research, development, and demonstration projects to benefit the public in the United States and internationally. EPRI's mission is to advance safe, reliable, affordable, and environmentally responsible electricity for society through innovative science and technology solutions. The institute collaborates with APS and a wide range of stakeholders, including utilities, government agencies, and academic institutions, to address the challenges facing the energy industry, such as improving wildfire risk reduction, grid reliability, enhancing energy efficiency, and supporting the transition to clean energy.

Edison Electric Institute (EEI) is an association that represents all U.S. investor-owned electric companies. Founded in 1933, EEI's members provide electricity for 220 million Americans across all 50 states and the District of Columbia, directly employing more than one million workers. EEI's mission is to advocate for policies that ensure reliable, affordable, and sustainable electricity. The organization along with APS focuses on advancing clean energy technologies, enhancing grid resilience, and promoting energy efficiency through collaboration with industry stakeholders, EEI aims to address the evolving challenges of the electric power industry and support the transition to a cleaner energy future.

10 KEY POSITIONS RESPONSIBLE FOR CWMP

While all APS employees and contractors who conduct field work are expected to understand wildfire risk and adhere to the operational protocols in place during higher PLs, the following key positions are responsible for the implementation of the CWMP:

Director, Forestry & Fire Mitigation – responsible for the overall strategic direction, macro-level planning, and oversight of APS’s fire mitigation program

Manager, Fire Mitigation – responsible for assisting with setting strategic direction, overseeing program implementation, and ensuring all the different fire mitigation pillars are addressed effectively

Supervisor, Fire Mitigation – responsible for the day-to-day leadership of fire mitigation specialists and other field fire mitigation team members in fire response, agency collaboration, and the Hazard Tree and DSAP programs

Supervisor, Fire Mitigation Construction & Maintenance – responsible for the implementation and execution of fire mitigation grid hardening projects

Fire Mitigation Specialists – responsible for responding to existing wildfires within range of APS facilities and acting as a liaison between APS operations personnel and first response agencies

Meteorologists – responsible for monitoring and forecasting atmospheric and fire weather and creating products disseminated throughout APS’s operations and planning organizations

Fire Science Data Analysts – responsible for analyzing current threat conditions, creating GIS products for planning activities, and assisting with forecasting current risk

11 CWMP COMPLIANCE REVIEWS

APS conducts periodic reviews of its wildfire mitigation program to monitor compliance.

The company utilizes multiple methods during these reviews including benchmarking its mitigation efforts against other relevant electric utilities. In addition, field audits are performed to assess the on-the-ground implementation of wildfire mitigation measures. Process compliance reviews further examine whether operational procedures are being followed. By May 1 of a given year, the Company decides what aspects of wildfire mitigation will be reviewed for that given year.

These reviews are carried out by both internal teams and external third-party organizations to ensure objectivity and depth. Internal reviews leverage in-house expertise and familiarity with the company's systems, while third-party audits bring an independent perspective and specialized knowledge. Third parties are given necessary access and visibility in order to conduct their reviews and report out directly to senior management.

12 GLOSSARY OF TERMS AND ACRONYMS

CFMP: Comprehensive Fire Mitigation Plan – this plan was previously called the Comprehensive Fire Mitigation Plan and has now been renamed as the Comprehensive Wildfire Mitigation Plan

CWMP: Comprehensive Wildfire Mitigation Plan – this plan

DOC: Distribution Operations Center

DOE: Distribution Operations Engineering

ECC: Energy Control Center

Elevated Fire Conditions: the period when Preparedness Level is at 3 or above

Emergent Work: Work that shall be completed because of an operational situation that currently poses a threat to the safety and reliability of the grid

Fire Guard: A Fire Guard shall consist of 3 hours of continual watch. A Fire Guard can be provided by any APS employee, or contractor, that has the proper fire tools and the ability to act if necessary.

Fire Risk Index: A risk index given to a line or distribution feeder by the FMS measured by three major fire components (probability of ignition, probability of a fire will carry, and fire impact as risk). Indices range from 1-5 in 0.5 increments, (5) being the highest risk.

FM: Fire Mitigation

FMS: Fire Mitigation Specialist

Ground to System Fire: An ignition source/fire unrelated to APS owned equipment, which has an impact to APS facilities

HFR: High Fire Risk

High Fire Risk Circuits: those circuits that have been determined to be high risk for fire based on historical fire activity, and on assigned Fire Risk Index. Additional operational measures are applied to these circuits for Elevated Fire Conditions.

ICC: Incident Command Center

NIFC: National Interagency Fire Center – The national fire logistical support center

Non-Emergent Work: Planned work that is not critical to operations and reliability of the grid in the short term

Pre-Emergent Work: Work that shall be completed because of an operational situation that poses a threat to the safety and reliability of the grid in the immediate future

Preparedness Level: Wildfire PL from 1 – 5 with 1 being the lowest/least severe and 5 being the highest/most severe. Each PL has specific work restrictions that must be adhered to by T&D personnel

ROW: APS right of way

System to Ground Fire: Any ignition source related to APS equipment or related system operations

SWCC: Southwest Coordination Center – provides logistical support for wildland fire, prescribed fire, and other all-risk incidents between the twelve Federal and State Dispatch Centers of the Southwest area. In addition, the Center provides Predictive Services and Intelligence related products.

TDICC: Transmission & Distribution Incident Command Center

T&D: Transmission and Distribution

Wildfire CPR: “Call, Plan, and Respond,” the APS approved method for responding to wildfires

WUI (Wildland Urban Interface): The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels

13 APPENDIX 1 – PSPS DISTRIBUTION FEEDERS

As of May 1, 2026, the following feeders will be part of the PSPS program:

Ashfork 06	Dewey 14	Navajo Army Depot 06
Blue Ridge 12	Elden 01	Newman Park 01
Brannigan 03	Elden 02	Oak Creek 02
Brannigan 04	Elden 12	Oak Creek 06
Bright Angel 02	Elden 13	Oak Creek 10
Bright Angel 10	Fish Sawmill 01	Osborn Tank 01
Capital Butte 02	Garland Prairie 01	Owens 10
Capital Butte 04	Hayes Gulch 02	Owens 12
Capital Butte 12	Hayes Gulch 04	Parks 14
Clarkdale 02	Hayfield Draw 02	Pinal 01
Clarkdale 04	Kachina 04	Pinal 02
Coconino 12	Kaibab 04	Pinal 03
Coconino 14	Kirkland Junction 10	Pinal 04
Coconino 24	Kirkland Junction 12	Pinal 06
Copper Canyon 02	Le Barron Hill 01	Pine Springs 01
Copper Canyon 06	Lonesome Valley 10	Poland Junction 01
Copper Canyon 10	Mazatazal 10	Poland Junction 03
Cordes 02	Mazatazal 12	Preacher Canyon 02
Cornville 02	McGuireville 10	Preacher Canyon 06
Cornville 04	McGuireville 14	Qapital Butte 02
Cottonwood 10	Miller Wash 01	Quail Springs 06
Cottonwood 14	Mingus 01	Quail Springs 10
Cottonwood 18	Mingus 02	Quail Springs 14
Cottonwood 22	Munds Park 09	Red Butte 01
Davenport 01	Navajo Army Depot 02	Red Lake 02
Delano 10	Navajo Army Depot 04	Red Lake 06

Rogers Lake 01	Soldiers Trail 01	Valle 09
Sage Valley 01	Soldiers Trail 05	White Horse 01
Sandvig 04	SRP Feed XGN01	Whitespar 02
Sandvig 06	SRP Feed XSG01	Whitespar 10
Sandvig 10	Strawberry 02	Whitespar 12
Sandvig 14	Switzer Canyon 13	Wilhoit 02
Sandvig 26	Switzer Canyon 14	Williams 09
Sedona 02	Switzer Canyon 18	Williams 13
Sedona 06	Switzer Canyon 22	Williams 20
Sedona 14	Tapco 01	Windmill 01
Showlow 09	Tonto 01	Winona 01
Showlow 13	Tonto 04	Winona 03
Showlow 19	Tonto 12	Woody Mountain 10
Shumay 06	Tonto 14	Woody Mountain 14
Shumway 02	Tusayan 14	

