WILDFIRE MITIGATION PLAN

Board Policy 11-28

KEM
ELECTRIC COOPERATIVE

Table Of Contents

I. OVERVIEW

A. Policy Statement

KEM Electric Cooperative, Inc. ("KEM") exists to provide safe, affordable, and reliable utility service to its members in the counties of Burleigh, Emmons, Kidder, Logan and McIntosh in North Dakota. KEM manages an extensive network of overhead and underground transmission and distribution lines. The Cooperative operates in areas with varying risk levels for wildfires, especially in locations where vegetation, topography, and weather conditions combine to increase the likelihood of ignition. KEM has developed this Wildfire Mitigation Plan in compliance with applicable law, to identify potential risks within our system, prevention methods, and to ensure the safety of staff, our membership, and the public.

B. Purpose of Wildfire Mitigation Plan

As evidenced in this Wildfire Mitigation Plan, KEM has a Cooperative-wide focus on addressing and minimizing wildfire related risks to the health, safety and welfare of our membership and the public. KEM is committed to fire prevention, safety, mitigation, control, and recovery and has taken a leadership role in addressing the threat of fire ignited within our service territory. To enhance the capabilities of our membership and local communities' defense against a wildfire event, KEM will share our personnel, resources, and information to effectively communicate all relevant material.

KEM's Wildfire Mitigation Plan reflects a broad range of activities performed throughout the Cooperative. The Wildfire Mitigation Plan is subject to the direct supervision of the Co-General Managers and as delegated to senior management. All Cooperative employees are responsible for contributing to and performing the activities described in the Wildfire Mitigation Plan. KEM's Wildfire Mitigation Plan begins with system design, construction, operation, maintenance, inspection, and repair activities aimed at significantly reducing the potential for KEM's facilities to become the source of ignition for fire. Nevertheless, the presence of our facilities and the range of climate and fuel (vegetation) conditions faced in KEM's service territory present some risk that our facilities, no matter how diligent or conservative our practices, might become the contributing source of ignition for a fire.

In the event fire conditions threaten public safety, KEM facilities, infrastructure or assets, KEM will mobilize an appropriate range of resources as provided in KEM's Emergency Restoration Plan (ERP).

KEM's Wildfire Mitigation Plan is a "living document", subject to modification as regulations and laws are updated, advances in technology occur, and our operational circumstances change.

Additionally, KEM will communicate to the best of its ability with the relevant county emergency managers, local elected representative's offices at the state and federal level, and our membership, and will review our Wildfire Mitigation Plan to ensure continuous improvement and maximum effectiveness.

The goals and activities included in KEM's Wildfire Mitigation Plan focus on a comprehensive and integrated assessment of the risks posed by KEM's transmission and distribution system. This involves an assessment of its equipment and facilities, weather conditions, the density and condition of potential fuels such as vegetation, and the potential threat to public safety. KEM's commitment to fire safety, prevention, mitigation, response, and recovery is a crucial element of our mission.

C. Organization of Wildfire Mitigation Plan

This Wildfire Mitigation Plan includes the following elements:

- Plan Objectives;
- Cooperative roles and responsibilities;
- Wildfire analysis and risk drivers;
- Wildfire prevention strategies;
- Procedures for disabling reclosures to mitigate potential wildfires;
- Procedures to restore electrical systems in the event of a wildfire;
- Costs for implementation of the Plan;
- Community outreach and public awareness;
- Participation with state or local wildfire protection or mitigation plans; and
- Evaluating the Plan.

II. OBJECTIVES OF WILDFIRE MITIGATION PLAN

A. Minimizing Sources of Ignition

KEM's Wildfire Mitigation Plan is based upon the goal of minimizing the probability that the various components of our distribution and transmission systems might become the original or contributing source of ignition for a fire. KEM continues to evaluate prudent, cost-effective changes and improvements to its physical assets that could and should be made to meet this objective and is implementing preventative operations, construction and maintenance plans consistent with these evaluations.

B. Resiliency of Electric Grid

The secondary goal of this Wildfire Mitigation Plan is to improve the resilience of the electric grid. KEM continues to evaluate and incorporate new technologies and equipment into its electric system. KEM's Operations and Engineering Departments are responsible for evaluating new equipment and use standards for emerging and pre-commercial technologies. Using equipment failure data, the departments determine which technologies should be incorporated into KEM's system and which could be improved prior to application. These departments continually evaluate the many new types of technologies which may improve electric reliability and public safety and give special attention to technologies that may contribute to KEM's fire-safety goals and objectives.

C. Minimizing Unnecessary or Ineffective Actions

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program, or protocol is determined to be unnecessary or ineffective, KEM will assess whether a modification or replacement is merited.

This Plan will also help determine if more cost-effective measures would produce the same or better results.

III. COOPERATIVE ROLES AND RESPONSIBILITIES

KEM's Wildfire Mitigation Plan is subject to the direct supervision of the Co-General Managers and as delegated to senior management.

All Cooperative employees are responsible for contributing to and performing the activities described in this Wildfire Mitigation Plan including:

- Conducting work in a manner that will minimize potential fire dangers.
- Taking all reasonable and practicable actions to prevent and suppress fires resulting from KEM's facilities and infrastructure.
- Using best efforts to communicate with federal, state, and local fire management personnel to ensure that appropriate preventative measures are in place.
- Immediately reporting uncontrolled fires.
- Taking corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.
- Ensuring compliance with relevant federal, state, and local laws and regulations as well as industry standard requirements.
- Maintaining adequate training programs for all relevant employees.

IV. WILDFIRE ANALYSIS AND RISK DRIVERS

KEM Electric's service territory is like that of south central North Dakota. Melted winter snow and spring rain bring pasture grass and other vegetation in spring. June through September is typically dry with little to no precipitation. Precipitation received during these months generally involves thunderstorms which bring the added risk of lightning strikes. Hot, dry, windy days are not out of the ordinary.

Small animals and birds getting into overhead equipment is one of the leading causes of electrically caused fires in our area. To mitigate these occurrences, covered jumper wire and bushing covers have been utilized and are installed on all new construction and on existing structures when maintenance is done. We have experienced a noticeable decrease in outages of this nature since they have been utilized.

KEM's experience has shown that poor or loose electrical connections are another major factor in fires started on the system. To mitigate these problems, throughout the system, all problematic connectors are removed and replaced with crimp connections or other suitable connections. The use of infrared technology may be used as another means of identifying problem hot spots when available and appropriate.

A small percentage of fires have been caused by trees getting into the powerlines. KEM performs tree trimming and vegetation management on an annual basis. We encourage the public to let us know if they see a problem with trees or branches through our social media pages, our website, and other communications channels to our members and the public. We have had good success with this approach.

Per the *ND Response Fire Safety* web page, the major sources of wildland fires in North Dakota include lightning, inadequate measures for controlled burns, smoking, and sparks from farm machinery and trains.

When fires are experienced in our service territory, and it is safe to do so, crews inspect poles in the affected area to ensure that they are structurally sound prior to re-energization.

A. Fire Risk Drivers Related to Construction and Operations

KEM staff evaluated utility fire causes and applied their own field experience to determine the critical potential risk drivers. The categories listed below were identified as having the potential for causing power line sparks and ignitions:

- Equipment failure
- Foreign contact
- Vehicle impact
- Cross-phasing
- Age of assets
- Vandalism
- Small animal contacts

B. Fire Risk Drivers Related to the Service Area

Within KEM's service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought
- Vegetation
- High winds and high temperatures
- Steep terrain
- Lightning

- Lack of moisture and dry soil conditions

C. Key Risk Impacts

Ignitions caused by the risk drivers have many possible outcomes. The list below outlines some of the worst-case scenarios, the prevention of which is the impetus for the development of this Plan:

- Personal injuries or fatalities to the public, employees, and contractors
- Damage to public and/or private property
- Damage and loss of KEM's owned infrastructure and assets
- Impacts on reliability and operations, and the potential for significant outages
- Damage claims and litigation costs, as well as fines from governing bodies
- Damage to KEM's reputation and loss of public confidence

D. Wildfire History and Outlook

A normal fire season in our service area typically starts around the first part of July and goes through September. The North Dakota Fire Danger Rating Map (available here: https://www.weather.gov/media/fgf/2025NDFireAOP.pdf), is produced each day during the early morning hours by the North Dakota Department of Emergency Services. It is a forecast of the potential for non-agricultural grasslands to carry fire based on weather and grassland conditions. The highest threat periods for grassland fire danger are usually before the spring green-up (when grasslands are still in dormancy coming out of the winter season) and in the late summer into fall (when the curing of grasslands lends to critical dryness in the moisture content of the various warm-season and cool-season grasses). This forecast product is issued at a minimum of twice daily during the fire weather season at approximately 4 a.m. and 4 p.m. Central Time and updated as needed.

During the fire season, KEM carries fire swatters, fire extinguishers and water cannons on all line service vehicles. Employees have been taught to be aware of where they drive and park and receive continued education in this regard.

KEM has replaced many of its oil-filled breakers with vacuum operated breakers. All electronic three-phase units are equipped with electronic relays that are set appropriately and operate the same in hot or cold weather. KEM is actively working towards installing SCADA ("Supervisory Control and Data Acquisition") for most of its electronic reclosers.

E. Fire Threat Assessment Mapping

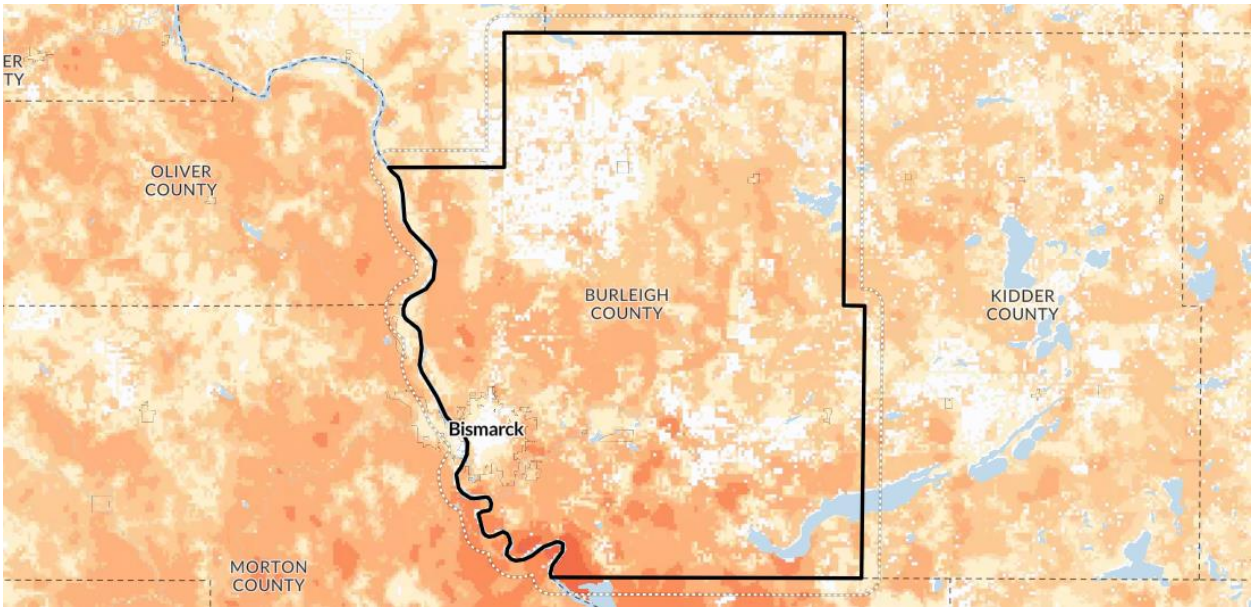
KEM is an electric distribution and transmission cooperative serving Burleigh, Emmons, Kidder, Logan and McIntosh Counties in south central North Dakota. KEM currently owns and operates approximately 123 miles of transmission line, 14 distribution substations, 722 miles of underground distribution line and 2,065 miles of overhead distribution line, which are interconnected with the facilities of Montana-Dakota Utilities and Basin Electric Power Cooperative.

KEM has identified areas within its service territory which may be subject to a heightened risk of wildfire utilizing the *Wildfire Risk to Communities* website (see maps on following pages). *Wildfire Risk to Communities* is a free website with interactive maps, charts, and resources to help communities understand, explore, and reduce wildfire risk. As wildfires increase in frequency and severity across the country, *Wildfire Risk to Communities* uses the best available science to not only identify risk but also provide resources for communities to manage and mitigate risk.

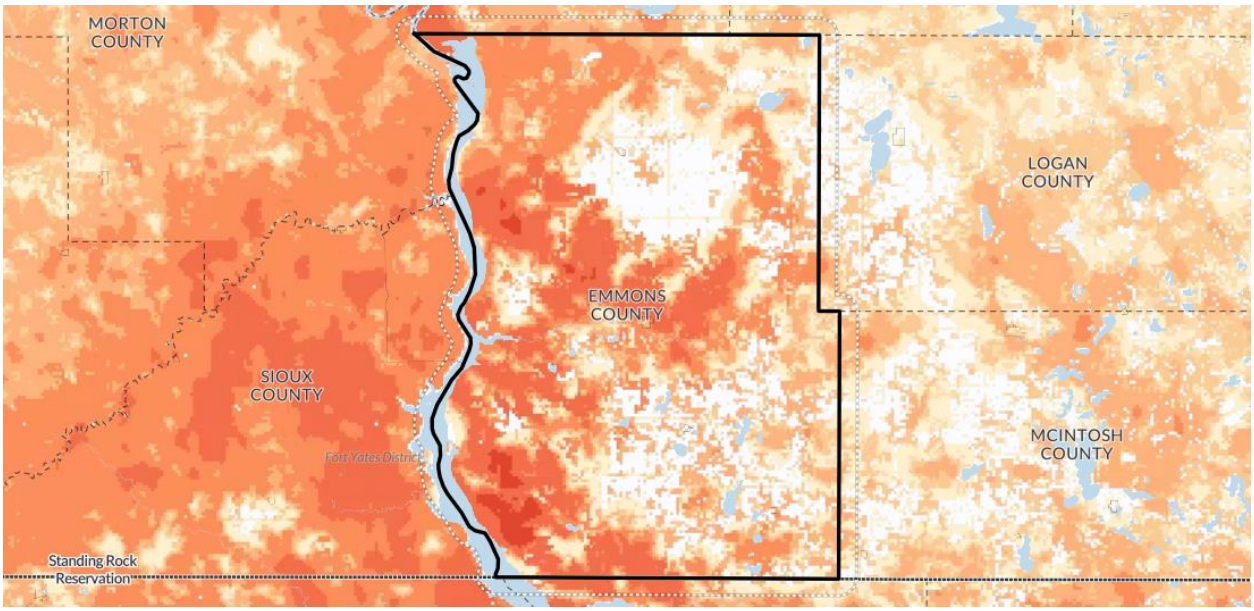
Wildfire Risk to Communities is built from a variety of nationally consistent data, including vegetation and fuels from LANDFIRE, weather from the National Weather Service, and community data from the U.S. Census Bureau, each with different vintages. Some of the data produced through the *Wildfire Risk to Communities* project is available for exploration online and all of the data is available for download as GIS raster layers. The Wildfire Likelihood maps for Burleigh, Emmons, Kidder, Logan and McIntosh Counties in North Dakota may be found at https://wildfirerisk.org/explore.

Wildfire Risk to Communities is designed to help community leaders such as elected officials, community planners, and fire managers understand how risk varies across a state, region, or county and prioritize actions to mitigate risk. The Wildfire Likelihood maps are resources that KEM may use to prioritize vegetation management activities, determine the location for focused recloser operational protocols, and future sectionalizing studies and associated remedial actions.

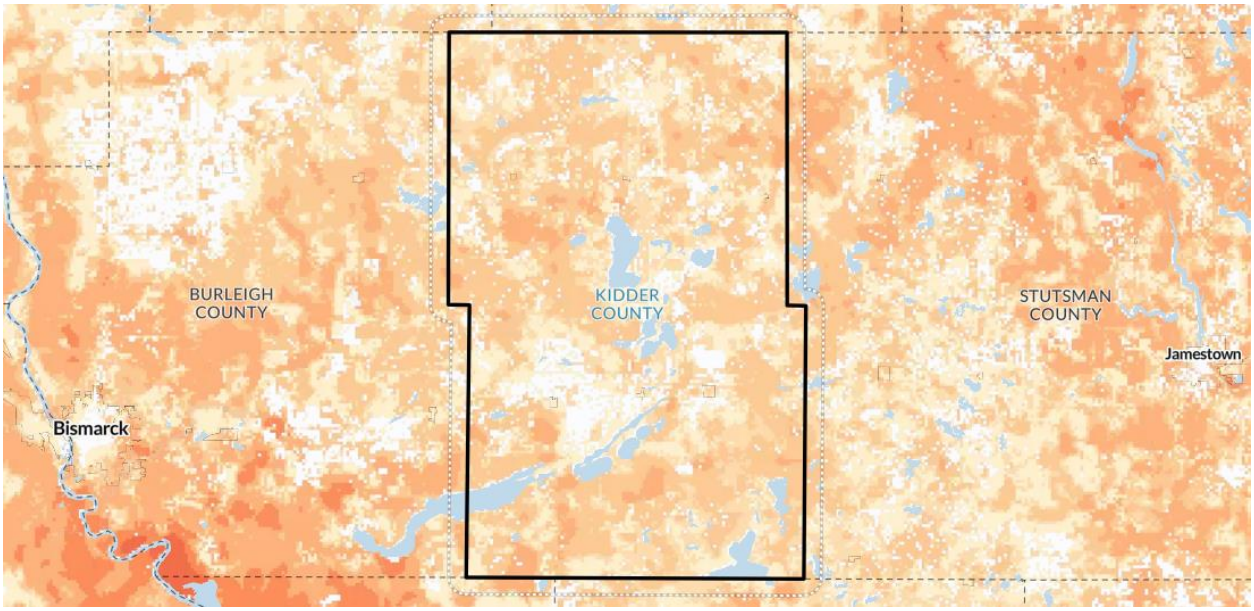
Wildfire Likelihood- Burleigh County, ND



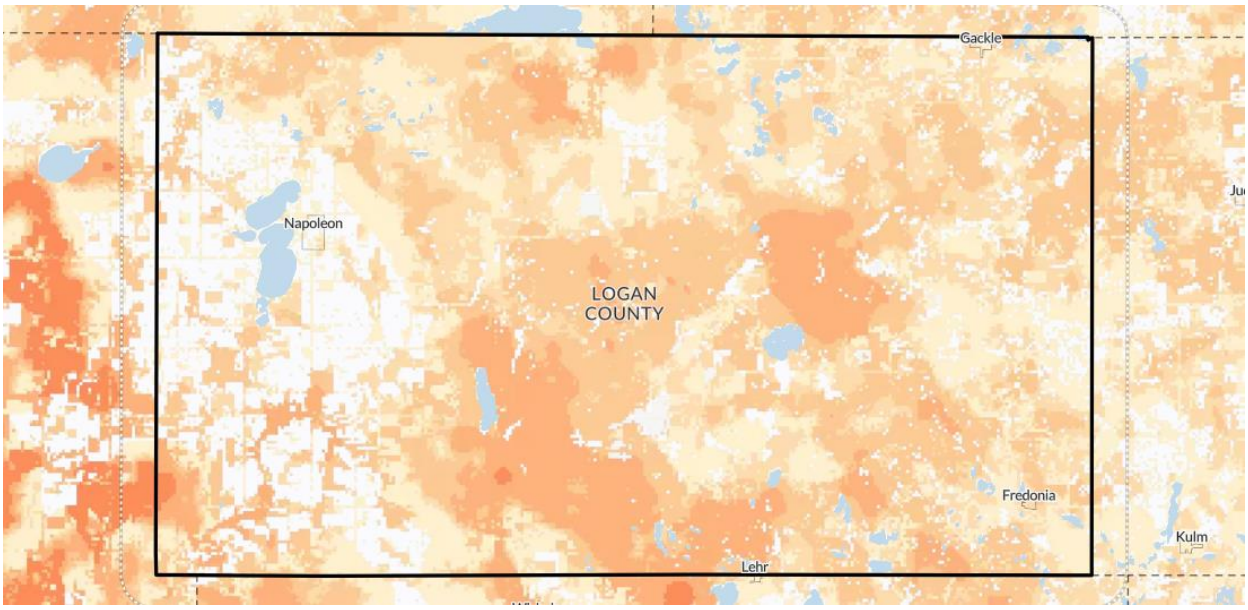
Wildfire Likelihood – Emmons County, ND



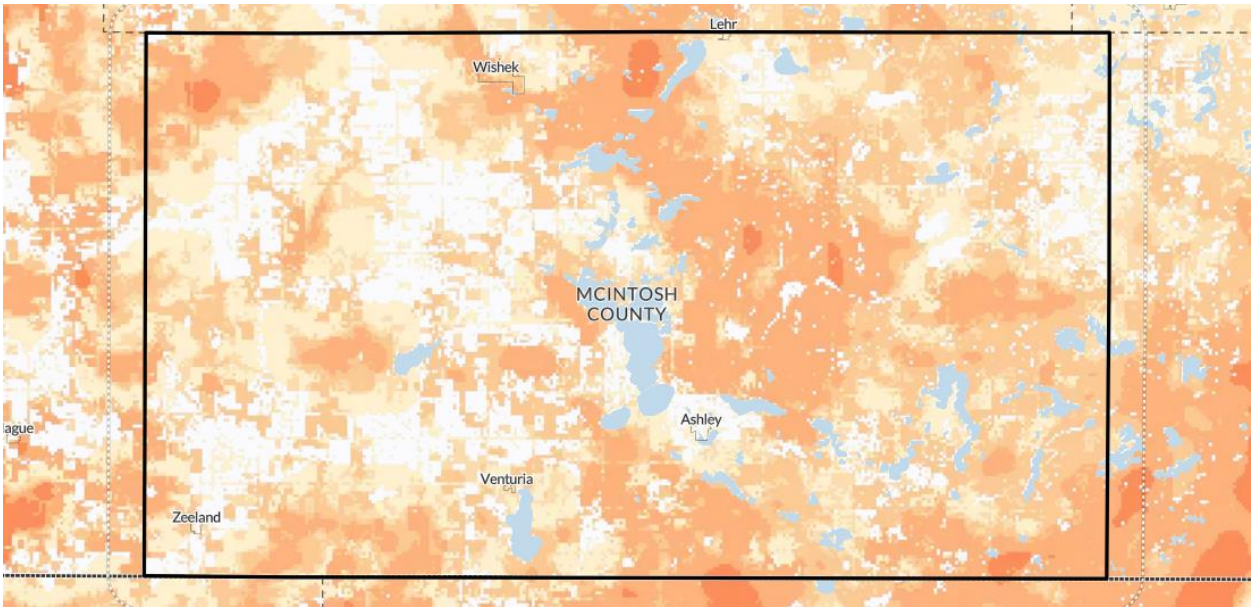
Wildfire Likelihood – Kidder County, ND



Wildfire Likelihood - Logan County, ND



Wildfire Likelihood – McIntosh County, ND



V. WILDFIRE PREVENTATIVE STRATEGIES

A. General Strategies

The regular and routine efforts KEM takes to minimize fires involving its distribution and transmission lines include the following:

- KEM line crews routinely receive hazard recognition and fire extinguisher training to help them identify and handle fire risk issues. Fire extinguishers are carried on vehicles and are tested regularly. During periods of higher fire risk, fire flappers, water cannons, and/or other fire suppression and mitigation tools are carried on designated vehicles and equipment.
- KEM follows USDA Rural Utilities Services (RUS) guidelines which require the routine line patrol of the Cooperative's distribution and transmission systems.
- Members and the public receive communications from KEM requesting their assistance in calling the Cooperative with any hazards they see.
- KEM works with WAPA, Montana Dakota Utilities, and its regional transmission operators regarding the operation of the transmission systems to avoid fire issues which may include not automatically reclosing the transmission lines after breaker operations.
- Weather conditions are considered when planning work and determining travel plans.
- Employees are advised to be cautious and on the lookout for smoke and fire hazards while working.

B. Weather Monitoring

Although the risk of fire is a year-round reality, there are certain recurring environmental and weather conditions when the risks of uncontrolled wildfires in KEM's service territory are abnormally high and the dangers most severe. When these abnormal and dangerous conditions are anticipated or occur, KEM is prepared to mobilize personnel and resources to abate, mitigate and respond to these conditions and any potential fire threats.

KEM will use the following resources for monitoring weather conditions and wildfire risk:

- https://ndresponse.gov/burn-ban-restrictions-fire-danger-maps
- https://ndresponse.gov/sites/www/files/documents/gallery/FireDanger/BurnBarn-Restrictions/ND-fire-danger-guide-web-pdf.pdf
- https://www.des.nd.gov/countytribal-resources/southwest-region
- https://www.des.nd.gov/countytribal-contacts/southeast-region
- www.weather.gov/bis or www.weather.gov/fgf or www.nd.gov/des
- https://www.arcgis.com/apps/dashboards/5c85b736d02d42239a77c0372aae15b8
- https://firms.modaps.eosdis.nasa.gov/usfs/map/#d:24hrs;@-100.47,47.45,10.00z
- https://ndawn.ndsu.nodak.edu/

C. Design and Construction Standards

Transmission and distribution infrastructure is designed and constructed in accordance with RUS standards, which meet or exceed the current National Electric Safety Code (NESC). Material is chosen on a case-by-case basis depending on engineering analysis or minimum design standards as indicated in KEM's current Construction Work Plan as well as this Plan.

D. Vegetation Management and Inspections

KEM performs annual line patrols that cover the entire system on a three-year cycle according to RUS specifications and reports any vegetation issues such as trees or brush that may be near or in substations, distribution or transmission power lines. Service orders are then placed in queue to be completed by a contract tree trimmer or Cooperative crews. Danger trees are taken care of on the spot or placed for immediate attention. Trees and vegetation that are found out of rotation of line patrols are also addressed when found while performing daily operations as well as those that are consumer reported and will be trimmed in accordance with the NESC, when appropriate. The trucks used in trimming utilize another person as the designated fire spotter to minimize any potential of ignition of the grass or vegetation under or near the trucks while trimming. Trimming will be done on days of less fire hazard or earlier in the day when moisture levers are higher if possible. Substations are kept free of vegetation by use of chemical vegetation control yearly or as needed from the monthly substation inspections. Any weeds or debris that has blown into the substation fence interior or exterior will be removed when found.

Line crews will monitor the vegetation surrounding its plant when performing repairs and maintenance and will periodically perform a visual inspection in areas of known rapid vegetation growth and perform vegetation management as necessary. KEM follows industry vegetation management guidelines and regulatory requirements as set forth by the American

National Standards Institute (ANSI), NESC, North American Electric Reliability Corporation (NERC), and RUS. Internal and contracted teams strive to align work activities with these guidelines; however, field conditions, including land usage, available right of way, etc. may limit the extent to which KEM can apply the guidelines.

E. Poles

Pole plant is inspected on a ten-year cycle to ensure the structural integrity of utility poles, which are critical to the safety of the power grid. The testing includes visual inspection, sounding and bore testing. Poles that fail the inspection are marked as rejects and are changed out within a year after inspection. Any pole considered a “danger” pole after inspection will be changed out immediately.

F. Meters

KEM has completed the deployment of TWACS AMR on all meters. These meters will be tested on a case-by-case basis as needed. Software updates are scheduled for regular maintenance. The total number of meters, along with secondary side assets, will be visually inspected annually in conjunction with designated three-year, overhead or underground cycle pattern.

G. Reclosers

The requirements found in this section are the minimum standards for KEM’s reclosers, and Cooperative personnel are encouraged to exceed these minimum standards as is feasible. Electronically controlled reclosers used by the Cooperative contain internal data which provide KEM with information on when the closer needs to be maintained or replaced. KEM will promptly respond to this data. When reclosers do not contain this data, the Cooperative will adhere to the testing and maintenance schedules recommended by the manufacturer. Electromechanical and oil-filled devices are checked every three years after installation. Oil-filled are removed and sent in for maintenance every three years. KEM intends to steadily shift from oil-filled devices to vacuum devices going forward to reduce the maintenance labor and improve device reliability in the future.

H. Voltage Regulators

Voltage regulators are inspected and adjusted annually. Oil samples are drawn to determine the need for maintenance on specific equipment, along with field operations, testing, and observation. When service is necessary, all oil is replaced, and new non-PCB oil is used in the servicing replacement/refurbishment program.

I. Distribution Transformers

Transformers are purchased with low-loss design and non-PCB oil. Each transformer manufactured before 1982 that is retired is tested for PCB content by a testing lab. Transformers determined not to be suitable for reuse are disposed of through an EPA approved disposal facility. All oil from oil-filled devices that are to be disposed of are also sent to this facility. Disposal documents of destruction are provided by the facility.

J. Overhead Line

Patrol and inspection of all electric distribution overhead line facilities is completed on a three-year cycle. This patrol includes overhead secondary lines, secondary connections, secondary and tree clearances, ending with a visual inspection of the meter.

K. Underground Line

All pad-mounted transformers are inspected on a three-year cycle, to include but not limited to, removal of lifting bolts, integrity assessment of pad mount, under locked and unlocked conditions, infrared testing may be performed on electrical connections, replacement of warning and danger decals, replacement of worn cable tagging, and repair of fiberglass basements, as well as painting of faded assets.

L. Substations

Substations are inspected monthly. Substation batteries are tested monthly. Annual inspection for overheating is conducted with infrared camera equipment. Oil samples are taken annually from all substation transformers and regulators and tested for dissolved gas as well as the normal standard oil tests. Electronic controlled vacuum reclosers are tested every other year. In substations with relay protection, electronic relays are tested on a ten-year cycle.

M. Hazard Recognition

Hazard recognition reporting, in supplementation of above-mentioned inspection program, is used, and trained on, by all employees and member contracted entities. Hazard recognition reports are documented, and retained, along with any corrective actions.

N. Workforce Training

KEM believes that an important line of defense against the ignition of fires is a well-trained and alert workforce. Internally, it has created a culture of fire prevention. To that end, KEM has developed work rules and complementary training programs designed to minimize the likelihood that KEM's facilities or field work be the source of ignition for a fire. Management has taken a proactive role in ensuring that all employees are aware of fire threat weather conditions and requires that all employees immediately report and document any suspicious activities witnessed in the field and document any uncontrolled fires that are likely to affect the Cooperative's property.

VI. PROCEDURES FOR DISABLING RECLOSERS TO MITIGATE POTENTIAL WILDFIRES

A. Procedures

To mitigate potential wildfires, KEM will implement the following procedures for disabling reclosers.

- **Infrastructure Mapping**: The Cooperative will maintain detailed maps of recloser locations and utilize its mapping and GPS resources to identify available access to ensure timely response during fire events.
- **Weather Monitoring**: The Cooperative will use real-time weather monitoring and fire risk models (e.g., based on wind, humidity, vegetation) to dynamically decide when and where to disable reclosers.
- **Selective Sectionalizing**: The Cooperative will set reclosers to non-reclose in high-risk areas.
- **Community Impact Analysis**: The Cooperative will evaluate the potential consequences of power outages on residential, commercial, and critical infrastructure before disabling reclosers.
- **Coordination with First Responders**: The Cooperative will use its best effort to inform emergency services of recloser disabling to avoid compromising response efforts in a fire or emergency, when first responders are known to be in the area.
- **Health and Communication Infrastructure**: The Cooperative will identify and prioritize circuits serving hospitals, emergency shelters, and communication towers to maintain service or provide backup solutions.
- **Public Notification**: The Cooperative will implement robust communication strategies to alert communities about planned outages, expected durations, and safety measures.

B. Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) preemptively deenergizes powerlines during high wind events combined with hot and dry weather conditions. When considering de-energization KEM examines the impacts on fire response, water supply, public safety, and emergency communications.

The risks and potential consequences of initiating PSPS are significant and extremely complex. KEM reserves the option of implementing a PSPS when conditions dictate. While KEM believes the risks of implementing a PSPS far outweigh the chances of its electric overhead distribution system igniting a catastrophic wildfire, the PSPS provides a last resort tool and another mitigation option in a potential crisis.

On a case-by-case basis, KEM will consider de-energizing a portion of its system in response to a known public safety issue or response to a request from an emergency management/response agency. Any de-energizing of the lines will likely be performed in coordination with local partner agencies; however, the final determination whether to de-energize will be made by KEM.

When circumstances allow, in advance of PSPS events or other disasters that may lead to an extended outage, KEM will contact the applicable county emergency management department(s) (EMD), to inform it about the PSPS protocol, including the location of the circuits which may be shut off during a PSPS event.

- If PSPS is initiated, the Cooperative will use its best efforts to:
    - Notify EMD, first responders, law enforcement, local fire stations;
    - Notify tribes, schools, medical facilities, local businesses;
    - Notify affected members and provide areas that are under a PSPS; and
    - Provide updates during the PSPS for conditions and restoration of power.

VII. PROCEDURES TO RESTORE ELECTRICAL SYSTEM IN THE EVENT OF A WILDFIRE

KEM will utilize the following procedures in conjunction with its ERP to restore its electrical system after a wildfire event.

A. Safety Clearance and Access

- **Coordination with First Responders:** The Cooperative will wait for clearance from fire and emergency services before entering affected areas.
- **Hazard Assessment**: Crews assess immediate dangers such as downed power lines, damaged poles, and unstable terrain.

B. Damage Assessment

- **Initial Survey**: As soon as possible after gaining access, crews conduct a visual and technical inspection of infrastructure (poles, conductors, substations).
- **Documentation:** Crews will record damage using GIS tools, photos, and field reports to prioritize repairs and allocate resources.
- **Member Impact Analysis**: The Cooperative will identify members affected and communicate estimated restoration timelines.

C. Infrastructure Repair and Restoration

Electric System Repairs:

- Replace or repair damaged poles, transformers, and conductors.
- Inspect substations and switching equipment for fire or heat damage.
- Test system integrity before re-energizing circuits.

D. Re-Energization Protocol

- **Phased Restoration:** Begin with critical infrastructure (hospitals, emergency services, communication hubs), then expand to residential and commercial areas.
- **Safety Verification:** Ensure all repairs meet safety standards before energizing.
- **Customer Notification**: Inform customers of restoration status and any required actions.

E. Post-Restoration Monitoring

- **System Checks:** Monitor voltage, load, and fault indicators to ensure system reliability.
- **Vegetation and Debris Management:** Clear fire-damaged vegetation and debris that could pose future risks.
- **Community Support Services:** Provide assistance and customer service for affected residents and businesses needing to rebuild.

F. Perform Long-Term Mitigation and Resilience Planning

- **Infrastructure Hardening:** Upgrade lines, poles, and substations with fire-resistant materials.
- **Regulatory Reporting:** Submit restoration and mitigation reports to relevant authorities and stakeholders.

VIII. COST FOR IMPLEMENTATION OF THE PLAN, INCLUDING SYSTEM IMPROVEMENTS AND UPGRADES

KEM utilizes an annual budget and work plan. In future years, and commencing with FY2026, KEM will track the amounts it spent on Wildfire Mitigation Plan implementation. It will also include its budgeted cost to implement KEM Electric's Wildfire Mitigation Plan for the following fiscal year. The budgeted costs include line patrol, pole testing, vegetation management, system hardening, SCADA, infrared technology, and overhead to underground conversion. In FY2026, KEM has authorized spending up to $4,590,900 in furtherance of this Plan. The incremental costs of this Plan were not calculated for FY 2026, but will be calculated and included in the Plan in FY2027 and subsequent years.

IX. COMMUNITY OUTREACH AND PUBLIC AWARENESS

KEM has created a multi-level approach to community education and outreach as our contribution to public awareness of fire threats, fire prevention and emergency preparedness. The key elements of this approach are:

- Member education including emergency preparedness and backup generator safety;
- Partnering with local fire departments and tribal authorities regarding fire preparedness;
- Informational and emergency preparedness mailings;
- Educational advertising campaigns focusing on KEM's preparations for the fire season and the preparations its members should make for emergencies;

- Educational information disseminated through the *North Dakota Living* magazine; and
- Distribution of informational pamphlets.

X. PARTICIPATION WITH STATE OR LOCAL WILDFIRE PROTECTION OR MITIGATION PLANS

Upon request or invitation, KEM will participate in and aid in the development of any state or local wildfire mitigation plans affecting its service territory. KEM will contact applicable state and local wildfire agencies to share its Plan and offer coordination in efforts.

In addition, in response to active emergencies, KEM will endeavor to coordinate closely with county and state emergency management departments or agencies, and serve as a dedicated partner in mitigation and response efforts.

Powerline de-energization performed pursuant to this Plan will normally be performed in conjunction with relevant state and local wildfire agencies unless circumstances do not allow for this coordination.

XI. EVALUATING THE PLAN

On an annual basis, KEM's Co-Managers will be responsible for ensuring relevant KEM personnel evaluate the Plan, including performance and compliance. Such review will include a review of any claims, maintenance, operations, training, and communication issues. No later than June 1 of each year, an annual report for the previous calendar year will be submitted to KEM's Board of Directors detailing Slope's compliance with and its review this Plan in accordance with the requirements of this paragraph.

This Wildfire Mitigation Plan is subject to review by KEM's Board of Directors. KEM will present this plan to its Board on an annual basis. During such annual review, any issues with the Plan and compliance will be identified and addressed. The current Plan and annual report will be published on KEM's website within 60 days of Board approval.

KEM's Board of Directors shall act on any updates to this Plan submitted to it within 120 days of submission.

KEM will file an update to its Wildfire Mitigation Plan at least once every two (2) years.

I, Carter Vander Wal, the Secretary of the Board of Directors of KEM Electric Cooperative, Inc., certify that the foregoing Wildfire Mitigation Plan was approved by the Board of Directors of KEM Electric Cooperative, Inc. at its Board meeting held on [DATE], 2026.

Carter Vander Wal
ID M9KSmRPPSFiRWLBmHFTzAJeH

Carter Vander Wal, Secretary

Implemented:	2/28/23	
Reviewed:	2/28/24	
Revised:	10/11/24	
Revised:	11/13/24	
Revised:	9/30/25	To be fully restated.
Revised:	2/24/26	To perform annual review and update Plan implementation budget in Article VIII.
Revised	4/21/26	To update Articles VIII, X, and XI to comply with SD wildfire mitigation plan statutes; to update plant information in IV.E.

eSignature Details

Signer ID:	**M9KSmRPPSFiRWLBmHFTzAJeH**
Signed by:	Carter Vander Wal
Sent to email:	carter.vanderwal@kemelectric.com
IP Address:	64.31.249.30
Signed at:	Apr 21 2026, 1:09 pm MDT