



WILDFIRE MITIGATION PLAN

Prepared by

Jordan Ambrogi

Wildfire Mitigation Manager

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Introduction

A portion of CORE's 5,000-square-mile service territory is located in forested, mountainous, restricted access areas where there is a high risk of wildfire. Honoring their commitment to public safety and the delivery of reliable power, CORE leadership has made wildfire prevention, mitigation, and recovery a top priority. CORE has implemented a robust Vegetation Management Plan, increased system inspections, taken steps to harden facilities, and implemented specific operating procedures to address wildfire risks.

While it is impossible to completely eliminate the potential for ignition inherent in the operation of an electrical system, CORE is committed to mitigating these risks to the greatest extent feasible while continuing to maintain reliable service and keep member rates stable. Effective wildfire mitigation can be achieved by continually evaluating methods and philosophies and by implementing procedures, equipment, and technology that effectively reduce wildfire risk.

This Wildfire Mitigation Plan (Plan) details CORE's efforts to mitigate risks of wildfire ignition in our service territory. All CORE departments with responsibilities will implement this Plan as written and recommend improvements to the Plan on an ongoing basis as potential improvements are identified.

Purpose

The purpose of the Plan is to describe the proactive strategies and programs that CORE has in place or that are being developed to minimize the risk that CORE Electric Cooperative infrastructure will cause wildfires. This Plan includes a description of the various programs, practices, and procedures that CORE has established or plans to implement. While many of the strategies and programs are in place today, there are other strategies under development. This Plan takes a holistic look at wildfire mitigation and will continually evolve as part of CORE's commitment to continuous improvement.

Objectives

The primary objective of this Plan is to reduce the likelihood that CORE equipment causes an ignition leading to a catastrophic wildfire. Pursuing this goal will facilitate the following secondary objectives:

- Protect human life and property within and adjacent to CORE territory;
- Maintain safe and reliable delivery of electric service; and
- Contribute to statewide efforts to mitigate the wildfire hazard to the public, infrastructure, and landscape values and resources

Overview of CORE Electric Cooperative

CORE Electric Cooperative is the largest electricity distribution cooperative in the state of Colorado. CORE functions as a non-profit with a board of 7 democratically elected regional directors.

CORE serves over 180,000 accounts (approximately 375,000 residents) across a 5,000 square-mile territory. The distribution network is made up of nearly 6,500 miles of overhead and 3,500 miles of underground powerlines. The transmission system that CORE operates contains 263 miles of overhead infrastructure, including both 44 to 115 kV transmission voltages, as well as over 50 permanent and 3 mobile substations. The majority of CORE's Rights-of-Way traverse private land and the United States Forest Service.

Description of CORE's Service Territory

CORE's service territory resides primarily in the Northeastern quadrant of Colorado, where terrain varies from grassy plains to densely forested mountain slopes. It is also one of the most densely populated areas in the state, encompassing the southern Denver metro area and some of the highest concentrations of homes in the Wildland-Urban Interface (WUI). Some of the highest fire-risk areas in the state intersect the more densely populated areas of CORE's territory, specifically in Jefferson and Douglas counties. The territory is divided into four operating districts: Bennett, Sedalia, Pine Junction, and Woodland Park.

Bennett District

The Bennett district is located east of the Denver Metro area and consists largely of grassy plains and fields primarily used for ranching and agriculture. While Bennett has the fewest line-miles with adjacent trees of the four districts, what trees can be found are usually overmature cottonwoods and elms localized in towns and creek-beds, which grow back aggressively after pruning.

Sedalia District

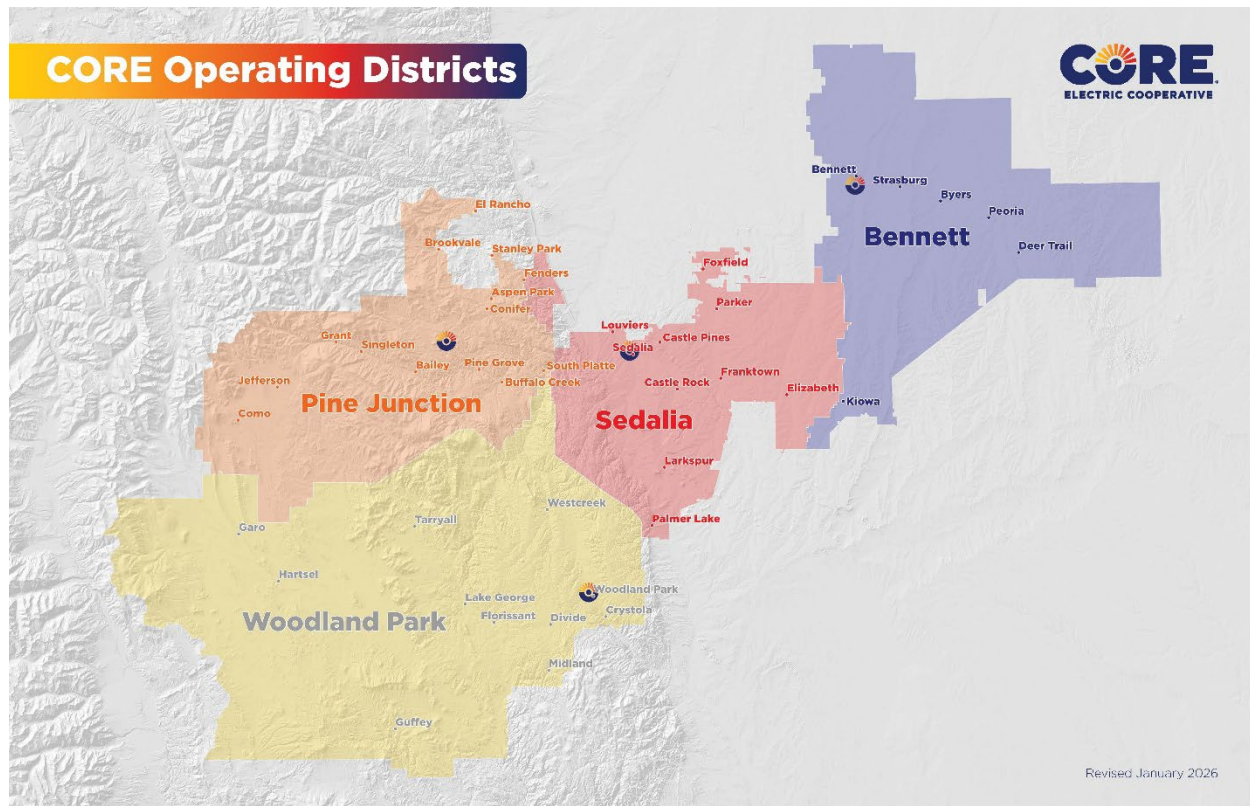
The Sedalia district is perhaps the most diverse of the four in terms of its terrain and land-use, ranging from open plains in the east through mature Ponderosa Pine forests in Elizabeth, to the densely populated Southeastern Denver metro all the way through the Front Range communities of Douglas County.

Pine Junction District

The Pine Junction district encompasses the mountain communities along the Highway 285 corridor through Jefferson, Clear Creek, and Park Counties, as well as a portion extending up to Floyd Hill and Bergen Park along Interstate-70. With the exception of the plains of Park Valley, the terrain in Pine Junction is mountainous and densely forested with lodgepole pines, firs and aspens, with the majority of homes located within the WUI and thus at high to extreme fire risk.

Woodland Park District

The Woodland Park district covers the region south of Pine Junction but with about twice the total area. This district has portions that are very similar to the overgrown forests of Pine Junction but also contains more of Park Valley to the West and a drier, more open forested region in the South around Guffey.



Land Ownership

Approximately one third of the land within CORE's territory is located within the Pike-San Isabel National Forest and is managed by the United States Forest Service. Denver Water is also a major land manager as the Upper South Platte Watershed lies almost entirely within CORE's service territory. In addition, there are numerous state parks and county open spaces throughout the territory, as well as gated communities and private residences.

Fire Protection Districts

CORE prides itself on maintaining cooperative relationships with all the landowners and managers within the Territory to promote the common goal of Wildfire Mitigation. To that end, the following is a list of all the Fire Protection Districts with jurisdiction overlapping CORE's Service Territory:

- Deer Trail Rural Fire Protection District
- Byers Fire Protection District
- Strasburg Fire Protection District No. 8
- Bennett Fire Protection District
- Kiowa Fire Protection District
- Elizabeth Fire Protection District
- Franktown Fire Protection District
- Rattlesnake Fire Protection District
- South Metro Fire Rescue Fire Protection District
- West Metro Fire Protection District
- West Douglas County Fire Protection District
- Jackson-105 Fire Protection District
- Larkspur Fire Protection District
- Inter-Canyon Fire Protection District
- Foothills Fire Protection District
- Evergreen Fire Protection District
- Elk Creek Fire Protection District
- Platte Canyon Fire Protection District
- North Fork Fire Protection District
- Jefferson-Como Fire Protection District
- North-West Fire Protection District
- Hartsel Fire Protection District
- Lake George Fire Protection District
- Southern Park County Fire District
- Four Mile Fire Protection District
- Florissant Fire Protection District
- Divide Fire Protection District
- Mountain Communities Fire Protection District
- Northeast Teller County Fire Protection District
- Green Mountain Falls-Chipita Park Fire Protection District

Fire History in Colorado

Fire has historically been an integral part of the natural environment in the Rocky Mountains, clearing out debris and undergrowth on the forest floor to make way for new life. Many of the species in Colorado are adapted to fire, and some even depend on periodic fire as part of their life cycles. However, decades of indiscriminate fire suppression have interrupted this natural process and coupled with effects of climate change, have exacerbated the problem; forests have become overcrowded and unhealthy and dead fuels have accumulated to such a degree that when wildland fires do start, they burn hotter and spread faster than ever before.

This pattern is borne out in the historical record of wildfires in Colorado, with all of the 20 largest fires taking place since 2001 and 4 of the 5 largest fires in state history occurring since 2018¹. The Marshall Fire, which began on December 30th, 2021, was the most destructive in state history, burning nearly 1000 homes and causing an estimated over \$2 billion in damages², including two lives lost. The trends of ever-intensifying fires coupled with rapid migration of residents into the Wildland-Urban Interface³ have created the potential for disastrous consequences should an ignition occur.

Specifically within CORE's service territory, there have been two large-scale fires in recent history: the Hayman Fire in 2002 and the Buffalo Creek Fire in 1996. The Buffalo Creek Fire was caused by a smoldering campfire in the Wellington Lake area and wind drove it to burn over 12,000 acres of forest and 10 homes⁴. The Hayman Fire, which is still one of the largest in state history with 137,760 acres burned⁵, was determined to be caused by a Forest Service employee. Though they occurred more than 20 years ago, the scars these fires left on the landscape are still plain to see.

While not nearly as large as the two fires described above, another significant fire threatened CORE facilities and members' homes in 2024. The Quarry Fire, which was discovered on the evening of July 30th, quickly grew along the south side of Deer Creek Canyon Road west of Grizzly Drive and spread through steep rocky terrain to threaten homes at the top of Sampson Road, prompting numerous evacuations. The difficult terrain and extreme heat at the time challenged fire suppression resources already spread thin by two other fires that had been burning along the Front Range. Through the persistent efforts of local volunteer fire fighters, hot shot crews, and emergency management personnel, the fire was fully contained on August 6th at just under 580 acres, with no damage to CORE facilities or other structures⁶.

In addition, there have been several small fires within the Territory in the last few years, some of which likely involved utility equipment. CORE performs a thorough investigation after any such ignition to determine root-causes, contributing factors, and alternative actions that can be taken to mitigate the risk of a similar incident occurring in the future.

Wildfire Risks

CORE has identified the primary environmental wildfire risk drivers for the service territory as follows:

- Extent of vegetation and vegetation type
- Extended drought conditions
- Vegetation health
- High winds
- Lightning
- Terrain
- Area access
- Population density

Extent/type of vegetation

Of the nearly 6,500 miles of overhead distribution lines that CORE operates, approximately 50% are forested. Tree types vary widely throughout the territory based on the environment. In the eastern plains of the Bennett district, the few trees that are near our line are typically cottonwoods, elms, and willows, all of which grow very quickly but are structurally weak. The eastern half of the Sedalia district is dominated by ponderosa pine forest, but also includes cottonwoods, elms, and landscaped trees in the subdivisions such as Russian olive. The western half of the territory transitions into the heavily forested foothills of the Front Range, comprised of ponderosa and lodgepole pines and firs. The Pine Junction district also contains mature ponderosa pine stands but is more notably characterized by overcrowded lodgepole pine forests and some aspen groves, which become more prevalent to the west in Park Valley. Similarly, the forests in the Woodland Park district are comprised of mixed pines, firs, spruces, and aspens.

Extended drought conditions and Vegetation health

Exacerbated by the impacts of climate change that have been felt across the western United States, extended drought increasingly dries out forest fuels, creating an environment where the smallest spark can lead to an uncontrollable blaze. Furthermore, drought imposes stress on living trees and makes them more susceptible to pests, which are enjoying longer active seasons and larger territories as a result of global warming. The conjunction of drought and increased pest activity has led to a rise in tree mortality. This has not only posed operational challenges for CORE due to an increased number of hazard trees near our facilities but has also increased the available fuel within our forests.

High Winds

In addition to drought and pest activity, climate change tends to increase the frequency of extreme weather, including high wind events. CORE has experienced several of these major events, with sustained winds up to 50 mph and gusts of up to 100 mph, similar to what was observed in the Marshall Fire. Windstorms of this magnitude pose not only a direct threat to CORE equipment through sheer force, but also the indirect threats of tree failure via breakage and uprooting.

Lightning

Lightning is a key to the WMP due to its potential to destroy electrical equipment and cause an ignition. Dry lightning is also common within CORE's service territory and presents its own ignition risk

Terrain/Area Access

The terrain in the western half of the territory is very mountainous, with steep slopes, varying aspects, and many draws and valleys. These features not only prevent vehicle

access and inhibit foot access but coupled with the dense forests that are present encourage extreme wildfire behavior.

The soil in these regions also presents a challenge as it primarily consists of decomposed granite. This type of soil does not provide a strong reference to ground for fallen conductors, leading to high-impedance faults. It also prevents trees from becoming deeply rooted and gives way under strong forces such as wind-loading and erosion. Furthermore, it is very easily eroded and can undercut tree roots, exposing them to the detriment of the tree's health and stability.

An additional challenge created by the terrain in CORE's territory is the presence of shallow bedrock throughout many of the regions with the highest fire risk. The depth and type of bedrock present here creates a significant impediment to burying powerlines underground, making this mitigation tactic unfeasible in areas where it would otherwise be the preferred mitigation.

Population Density

There is a growing trend in the United States of a disproportionate amount of people living in or moving into the Wildland Urban Interface³ (WUI), and CORE's territory is no exception. A significant portion of CORE's membership lives within the WUI, characterized as housing and development adjacent to undeveloped forested lands. These lands are primarily owned by the USFS, and while the Forest Service has been implementing their long-term plans to mitigate and reduce fuel loads, these areas are projected to support the highest fire intensity in the state⁷. For this reason, many of the communities CORE serves are at the highest risk of wildfire, according to the Colorado State Forest Service (CSFS) Wildfire Risk Assessment.

Operation of an Overhead Electrical System

There is an inherent risk of ignition in operating a high-energy overhead electrical system. The main risk drivers associated with the system which could spark a wildfire are as follows:

- Contact from objects (trees, vehicles, wildlife, etc.)
- Equipment failure
- Wire-to-wire contact and insulator contamination

Contact from objects

Contact from foreign objects is significant ignition risk inherent in operating an electrical system and can cause ignition in multiple ways. In the case of vegetation and wildlife, the contact between energized equipment and a grounded object creates fault current which causes the object itself to ignite. This can start a fire in a tree contacting the line or cause a flaming animal to fall into dry vegetation and create a ground fire that under the right conditions can grow out of control. Additionally, even the arc or sparks created

by these events, like when a falling tree pushes the primary conductor into contact with the neutral.

Similarly, mylar balloons that come into contact with electrical lines can result in fiery explosions. Vehicles that hit electric poles can knock energized lines to the ground and can even ignite themselves depending on what kind of equipment they strike.

Equipment failure

As with any equipment subject to frequent or constant use, electrical equipment has a finite life of operation and will wear out over time. Unknown internal defects in equipment, improper installation, and damage during its life-cycle are all possible reasons why a piece of equipment can fail. Depending on the piece of equipment, failure can lead directly to the discharge of sparks and molten material. In other cases, failure can cause an energized wire to fall to ground which presents its own potential ignition source.

Wire-to-wire contact and insulator contamination

Because it is impossible to tension powerlines to such a degree that they never move, there may be occasions where two differently phased wires contact one another. In the presence of high winds or the unloading of snow and ice off one line directly beneath another, powerlines can sway enough to contact one another. When this occurs, a fault is created that is expressed by heat and arcing, or the ionization of the air. These thermal events can ignite dry fuels that may be present in the area on their own, or they can throw sparks and molten metal that fall to ground and ignite vegetation.

Similarly, insulators that are contaminated with a foreign substance that is more conductive than the insulator can cause electrical energy to track and “flash-over”. This results in an arc-flash and possible equipment failure that poses an ignition risk.

Risks to Business Continuity

Because CORE operates within a fire-prone landscape, wildfires within the service territory or surrounding areas also pose the risk of impeding essential business functions, business continuity, and any recovery efforts. Business risks include:

- Unavailability or loss of CORE or Xcel Energy transmission system
- Loss of communications systems (cellular, radio, fiber, microwave)
- Loss of internet
- Inability to access office locations, equipment, and vehicles
- Impacted roadways limiting movement of personnel and equipment
- Impacts of system de-energization

Loss of Transmission System

CORE depends not only on its own infrastructure but also that of Xcel Energy to meet its transmission needs. The availability of power through the transmission system could be imperiled in two key ways related to wildfire.

The first is the presence of an active fire in the vicinity of high-voltage transmission lines. Not only does a fire have the potential to physically damage equipment and structures in a way that would cause them to fail, but the smoke can possibly cause an outage as well. When smoke is thick enough, it can provide a path to ground for the electricity running through the lines, which can further damage equipment as well as threaten the safety of first responders working to suppress the fire. For that reason, the transmission system may need to be deenergized in response to an active fire, either at the request of emergency management or at the discretion of the operating utility.

The second reason the transmission system could be unavailable is that it has been proactively deenergized in advance of an extreme risk scenario, called a Public Safety Power Shutoff (PSPS). CORE's PSPS Procedure is detailed in a later section of this Plan.

Loss of Communications Systems/Internet

Communications and internet are essential to CORE's business continuity as they facilitate the real-time exchange of data and information that our system relies on. Physical damage or extended loss of power to this critical infrastructure would severely impact not only CORE's ability to conduct business but also that of every other sector including emergency response.

Inability to Access CORE Facilities

An active fire near CORE facilities could force the company and its employees to evacuate the location. This would cause a major disruption to business operations in the affected district(s) by preventing access to CORE equipment and materials that are necessary to respond to outages and other issues that may arise. CORE is developing contingency plans to move operations from an affected office to one of the other office buildings outside the affected area.

Impacted Roadways Limiting Movement of Personnel and Equipment

It is common in wildfire situations that roadways are closed or have their use restricted for the purposes of evacuation and emergency response. This could impede the ability of CORE personnel to transport resources and equipment necessary to respond to outages or damage on the system.

Impacts of System De-energization

Similar to the discussion of the potential loss of the transmission system, there would be impacts resulting from the de-energization of the distribution system in a wildfire event. While CORE owns and operates its entire distribution system, there may be reasons to de-energize parts of it that are outside our control. Those would include requests by first

responders to allow them to fight an ongoing fire safely or a decision made by CORE to implement a PSPS.

Wildfire Mitigation Strategies

The overall goal of this Plan is to minimize the probability of CORE facilities causing or contributing to ignition, with a secondary goal of improving the resiliency of the system from external factors. The effectiveness of each strategy will be evaluated over time to determine if a more cost-effective solution is available that would produce equal or better results. CORE's strategy has been delineated into categories as follows:

- Situational Awareness
- Operational Practices
- Inspection Programs
- Vegetation Management
- System Hardening
- New Technology
- Workforce Training
- Metrics and Reporting

The following sections provide an overview of the wildfire mitigation strategies and programs associated with each of the above areas.

Situational Awareness

This section describes how CORE ascertains the underlying wildfire risk throughout its territory and monitors changing environmental conditions that augment this risk. This situational awareness allows CORE to adapt daily operations, emergency preparedness, and risk mitigation efforts to changes in fire conditions.

Territory Risk Analysis

CORE assesses the wildfire risk throughout our territory in two ways: one that represents the potential consequences of an ignition associated with CORE equipment, and another that shows where CORE assets face the greatest risk of being damaged by a wildfire. These types of risk are called Conditional Risk and Expected Risk, respectively. Conditional Risk models the potential impacts of an ignition under the assumption that one is going to occur (probability = 1) and is useful in cases where the "treatment area" is already defined, like a utility right-of-way. Expected Risk looks at the potential severity of a fire combined with the likelihood that one might occur. This is what land managers might use to develop and prioritize mitigation project areas.

Risk was calculated in separate ways to serve different necessary purposes. The Conditional Risk map informs where CORE prioritizes proactive mitigation work and operational practices for the purpose of preventing an ignition from CORE equipment. The Expected Risk map shows where CORE should focus efforts aimed at protecting CORE equipment and facilities from a wildfire in its service territory.

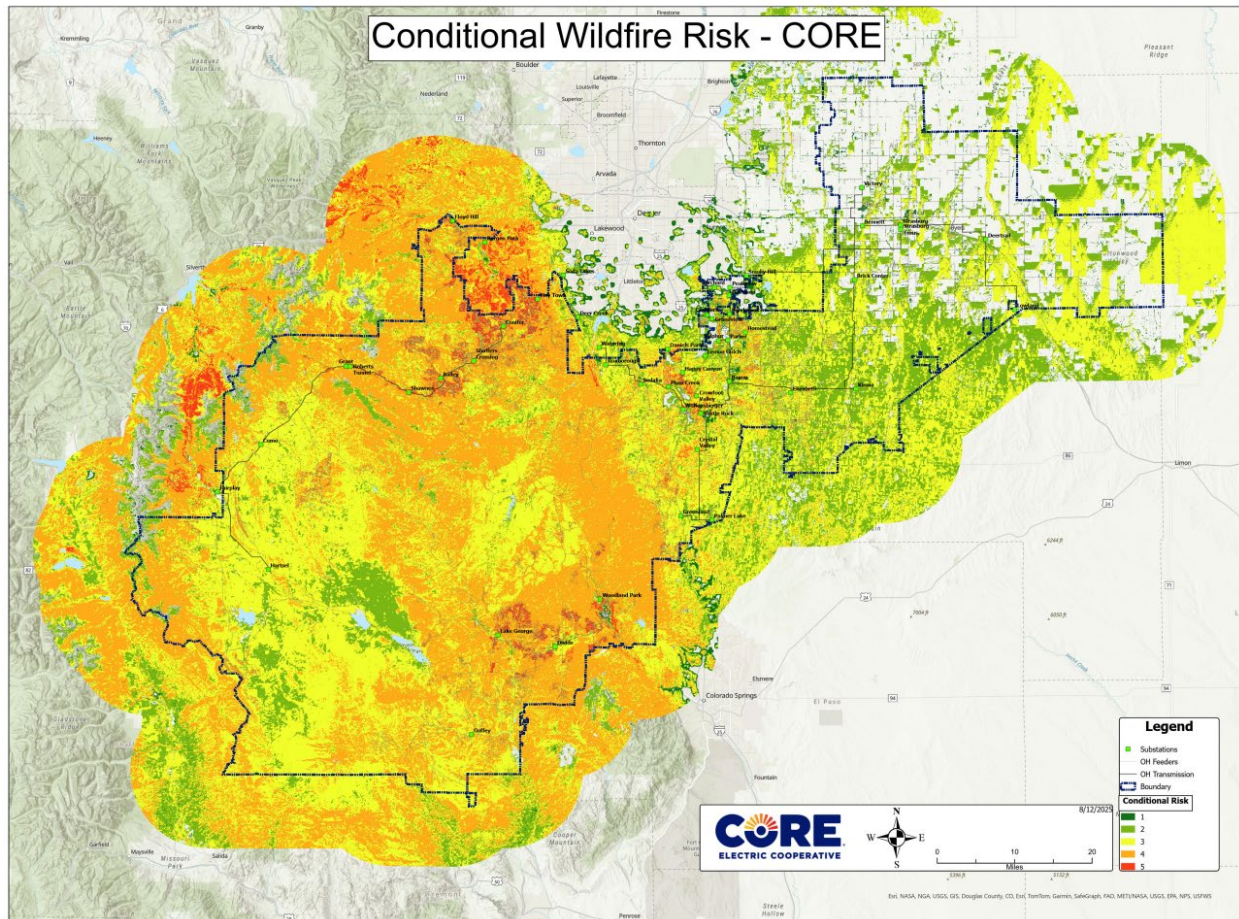


Figure 1. Map displaying Conditional Wildfire Risk across CORE's territory

The source of the map data we use to assign risk to facilities is the layers and data from the Colorado Wildfire Risk Assessment Report produced by the Colorado State Forest Service (CSFS), updated in 2023. For the Conditional Risk map, we used data from the Fire Intensity Scale and Values at Risk (VAR) layers. The VAR is a rating that considers Wildland Urban Interface, Forest Assets, Riparian Assets, and Drinking Water Importance to derive a risk value to an area. For the Expected Risk map, we combined the Fire Intensity Scale and Burn Probability (BP) layers. The BP is a probability value for any location burning due to a wildfire and is calculated annually by CSFS.

We have paired this wildfire risk data with spatial data depicting resources and assets such as communities, structures, or power lines in order to approximate relative wildfire risk to those resources and assets. The Colorado Wildfire Risk Assessment contains other detailed data that CORE utilizes in assigning priority to system modifications. This data includes dozens of layers with multiple values for categories such as Wildfire Risk to Assets, Wildfire Effects, Wildfire Behavior, and Landscape Characteristics.

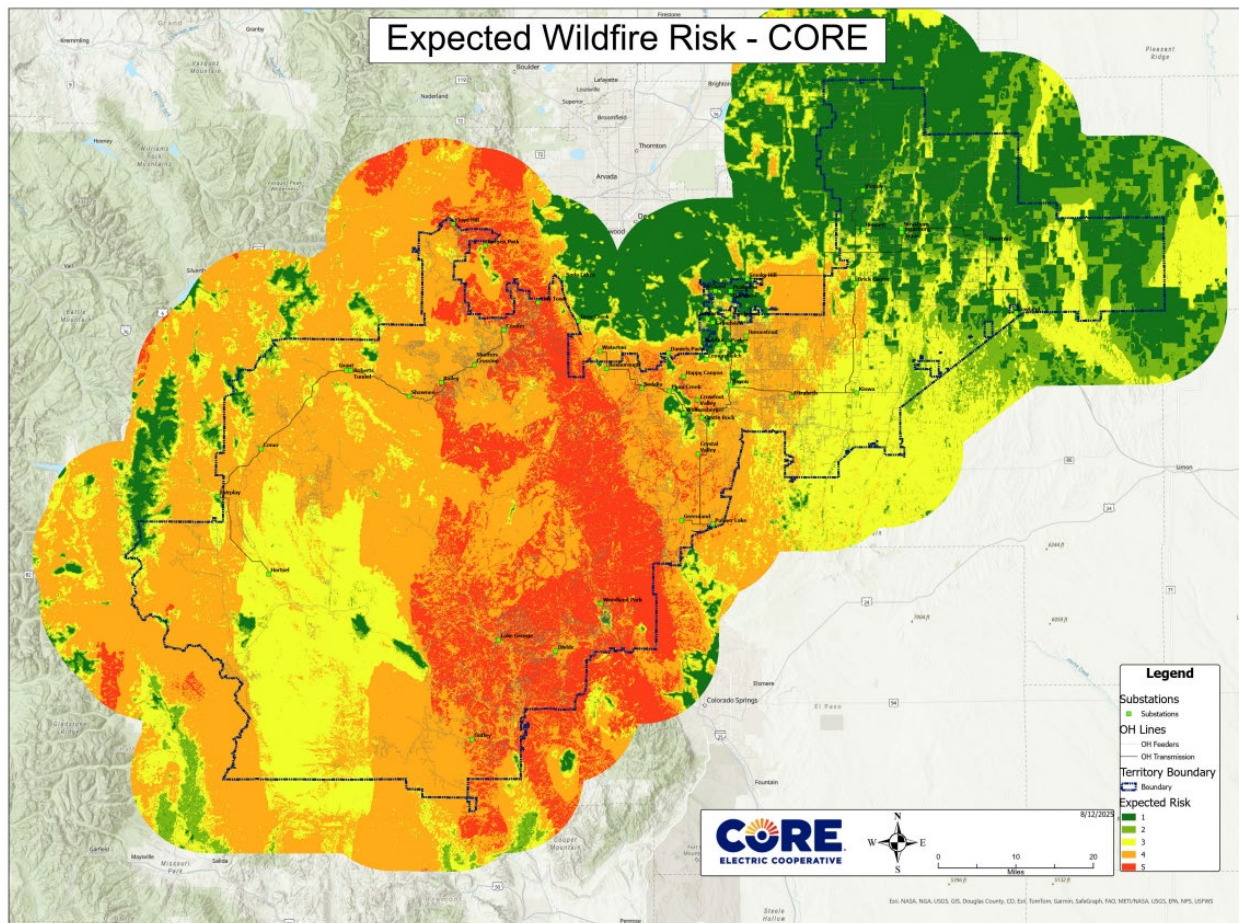


Figure 2. Map displaying Expected Wildfire Risk across CORE's territory

Daily Risk Forecasting

CORE has developed a Wildfire Hub as a situational awareness tool through GIS that displays fire warnings and watches for the service territory, in addition to many other resources. Daily fire risk data is obtained through a combination of map services from NOAA's Warnings and Watches and from the Colorado Division of Fire Prevention and Control's (DFPC) Fire Environment Update map service. These maps provide all operational personnel with daily information on Red Flag Warnings, High Winds Warnings, and the fire risk levels for each feeder in our service territory.

In addition, CORE subscribes to WeatherSentry by DTN Weather Services to receive daily reports of impactful weather conditions throughout broad areas of our service territory, including wildfire risk. CORE System Operators log weather conditions and send pertinent information and warnings to all Operations personnel and contractors.

In 2024, CORE implemented FireRisk Web, now called Wildfire Ops, by Technosylva to enhance our daily situational awareness. The tool provides detailed 5-day forecasts of various wildfire risk metrics derived from simulated ignitions at every 100 meters of line. It also displays meteorological conditions at 2km resolution and numerous other data layers that give CORE invaluable insights into what is driving daily wildfire risk. This

allows us to be surgical with operational decisions that reduce risk but may negatively impact members, such as Alternate Relay Settings or PSPS.

Furthermore, CORE began a trial with EDM International in 2026 to test and develop their emerging situational awareness tool, named FPIQ. Like Wildfire Ops, this tool offers a forecast of wildfire risk based on weather and fuels across our territory. Risk is modeled as the probability of an ignition becoming established in the local fuels and its propensity to spread under forecast conditions. This is presented as a FPIQ score from 0-100 and provides a straightforward view of wildfire risk that may be more accessible to utility operators.

Ignition Tracking

One of the most effective ways to determine what drives the highest risk of ignition from an electric system is to track and study the ignitions that have occurred from the system. That is why CORE has a process for our linemen to report the details of any ignition that appears to have been caused by CORE equipment. Using this data, we can determine what events most frequently cause ignitions and what environmental/weather conditions tend to lead to the greatest fire spread and subsequent damages. This information informs our wildfire mitigation work and allows us to continuously improve our approach.

Additional Situational Awareness Tools

360 Overwatch Cameras

CORE Electric Cooperative has joined a partnership with other utilities to place cameras on radio towers or existing lookouts for the purpose of monitoring new fires across our service territory. CORE has funded the placement of cameras at Conifer Mountain and the Castle Rock substation and has access to all cameras in the program. These cameras have many strategic benefits, including the ability to monitor fires in relation to CORE facilities.

Pano AI Cameras

CORE has established a partnership with Pano AI wherein nine (9) camera stations have been installed on radio towers at the following locations:

- Mestaa'ehehe
- Doublehead Mountain
- Conifer Mountain
- West Creek
- Devil's Head
- Monkey Face
- Badger Mountain
- Mount Bailey
- Highland Park

The cameras capture 360-degree panoramic images every minute that are analyzed by AI to detect rising smoke plumes from new fires. When potential incidents are confirmed by humans in Pano AI's intelligence center, alerts are sent out to CORE employees and

emergency responders who have enrolled to receive them. The alerts contain a link to the video feed of the incident, allowing emergency responders and CORE to monitor the growth of the fire. This technology provides early warning capabilities especially in remote areas and a precise location through triangulation when more than one camera has a view of the smoke plume. It also allows emergency management personnel to zoom in and monitor the status of the fire in real time for the duration of the incident.

This investment in early detection has already yielded benefits in enabling rapid initial attack from our emergency management partners, helping to avoid potentially devastating consequences from wildfire in several documented cases that are included in [Appendix K](#).

CORE has also partnered with Xcel Energy to share access between Pano stations that overlap each other's areas of concern. Xcel provided access to 13 of their Pano stations in exchange for access to CORE's 9, increasing the total coverage in CORE's service territory to 22 stations at no additional cost.

Western Weather Group Stations

As an additional measure to improve real-time situational awareness, CORE has invested in 10 weather stations from Western Weather Group for the program's initial deployment. These stations provide 10-minute observations of temperature, wind speed and direction, and relative humidity, and can be enabled for 30-second observations when more granular data is needed. They are mounted directly on our distribution poles in high-risk areas, providing reports of weather conditions impacting CORE assets. This enhanced awareness enables CORE to make strategic decisions for de-energization and restoration in response to real-time conditions occurring at our asset locations.

Operational Practices

Operating Procedures

Utilizing the situational awareness data, CORE can determine what operational procedures or protocols to issue based on the fire risk level. The relevant weather and fire risk data are reviewed daily, and operating conditions will be issued as follows:

- Normal – Standard operating procedures; no changes required.
- Extreme, Red Flag, or High Wind Warning Conditions – Work on energized overhead lines may be stopped except as needed for safety or to correct outage conditions. If work must be completed, the job will be reviewed, and any additional mitigation steps will be put into place as necessary.

The System Operators are responsible for distributing an email to Engineering, Operations, and contractors when conditions are in the Elevated/Red Flag Warning range. Such emails are not generated when conditions are in a normal state. A sample email is appended to this Plan as [Appendix A](#). The emails include instructions for the field personnel as provided below.

Red Flag Instructions

Under Red Flag or High Wind Warning conditions, the following operational steps are required:

If a fire is observed or inadvertently initiated by field personnel, take the following actions:

1. Extinguish, if doing so presents minimal risk to personnel;
2. If unsafe to extinguish, dial 911 immediately and direct first responders to the location;
3. All fires of any size or duration shall also be reported, as soon as possible, to the System Operator, Supervisor, and Wildfire Mitigation Manager.

The following work practices shall be observed:

- No open fire/burning is permitted;
- All fires will be extinguished if safe to do so;
- All non-critical line clearance, tree pruning, and removal activities should be moved to less risky areas, such as urban, roadside, and accessible areas if possible;
- All blasting will be discontinued;
- All grinding and welding will discontinue, except in enclosed buildings or within areas cleared of all flammable material for a radius of 10-feet. A chemical pressurized fire extinguisher of at least 5-pound capacity and a shovel will be kept with each welder;
- Each gasoline-powered saw will be equipped with a screen-type spark arrestor. Gas and oil will be carried only in approved safety cans. Saw operators shall check closely around the cuts of logs, felled or bucked, particularly in the vicinity of cuts, to ensure a fire has not started. A shovel and fire extinguisher, of at least 8-ounce capacity, will be with each power saw operator at all times. Having the shovel with the gas can used to refuel the saw may be considered "readily available" if not more than 200-feet from the saw;
- Vehicular travel will be restricted to established designated roads except in case of an emergency. In no case will vehicles with hot exhaust systems be driven over or parked in grassy areas;
- Special care will be taken to prevent fires when refueling equipment;
- Smoking is prohibited during periods of Elevated or Extreme/Red Flag Conditions;
- A muffler or spark arrestor satisfactory to the USFS will be maintained on the exhausts of all trucks, tractors, and ATVs or other internal combustion engines;
- Adherence to fire prevention practices and use of required tools (i.e., spark arrestors, properly maintained equipment, welding blankets) is critical, and the presence and use of firefighting tools (shovels, axes, pressurized extinguishers filled with water, chemical pressurized fire extinguisher, welding blankets) while working is required;

- Extra caution should be used when performing any of the activities described as operational and while using all-terrain vehicles (ATVs) and off-road equipment, particularly within the high fire risk areas.

Alternate Relay Settings

CORE has developed an alternate settings group for distribution feeders referred to as Alternate Relay Settings (ARS). The alternate group consists of an instantaneous trip with one reclose after a 10-second open interval. The reclose is also an instantaneous trip. ARS have been installed and commissioned on all feeders in all substations throughout the service territory, with the exception of eight (8) that serve primarily underground feeders.

ARS are enabled whenever CORE circuits are overlapped by a NWS Red Flag Warning. The decision to implement ARS when other conditions indicating elevated fire risk are present is a collaboration between the COO, District Managers, Field Operations/Operations Technology Directors, and the Wildfire Mitigation Manager. The criteria triggering these discussions and the process by which the decisions are made are detailed in the Alternate Relay Settings Procedure, attached as [Appendix B](#).

Alternatives to ARS may include monitoring outage reports for device operations in the affected area as well as dispatching linemen to patrol specified circuits.

Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) is a measure of last resort that utilities occasionally use to avoid the potential to spark a catastrophic wildfire fire when no other mitigation practice can sufficiently reduce risk. The practice involves preemptively deenergizing powerlines when extreme winds are forecasted in conjunction with critical burning conditions on the landscape. Long-term drought and high temperatures are becoming increasingly common throughout the West, and extreme winds such as those occasionally experienced in CORE's territory increase the likelihood of equipment failure and vegetation contact that could result in an ignition and subsequent extreme fire behavior. For these reasons, CORE has developed a procedure to implement a PSPS and provide thorough notification to all affected, attached to this document as [Appendix C](#).

A PSPS event is extremely impactful and can severely disrupt essential business and daily life functions for thousands of members CORE serves. That is why CORE reserves the practice only for the most severe wildfire risk conditions and will do everything in its power to limit the scope and duration of such an event to only what is necessary to effectively mitigate risk.

Job Briefings

A Wildfire Briefing section is included in the Job Briefing Form, which is completed by the crews before every job commences. This requires discussion of the fire risk, verification that appropriate fire mitigation tools are available and in working condition, and the discussion of escape routes in the event of a fire. A copy of the Job Briefing Form is appended as [Appendix D](#).

Inspection Programs

CORE has implemented robust maintenance and inspection programs for our distribution, transmission, and substation facilities. A description of each is provided below.

Overhead Distribution Line Inspection Program

CORE has historically performed overhead distribution inspections on a seven-year cycle, with main feeds and circuits located in the Level 5 high-risk fire area being inspected every 3 years. Each district prioritized the feeders based on fire risk and performed inspections and maintenance as required. Whenever maintenance work is identified and performed on a pole, all the equipment on the pole is upgraded to CORE's current standards. Currently, inspections are completed by walking or driving the lines, and the use of infrared cameras and drones has been increased to perform these inspections. The drones capture several images per pole in both High Definition and InfraRed that are analyzed to identify any of the defects listed above from a top-down and side view.

During ground-based and drone inspections, the inspectors look for issues such as:

- broken or loose hardware
- mechanical damage to any component
- the condition of guy wires and anchors
- replacement of uninsulated open wire secondary conductors
- condition of insulators and conductors
- condition of disconnects and fuse holders
- condition of risers and conduits
- condition of transformers, switches, reclosers, voltage regulators, cap banks
- additional cover-up and animal guards

Ground conductors, signs, and other minor hardware also are inspected. Defects are categorized in a risk prioritization framework to identify which require immediate attention versus those that can be deferred until resources are available. Examples of specific items that are being replaced when found include:

- hot-line clamps
- porcelain fused cutouts
- air-gap arresters on distribution transformers
- damaged equipment such as crossarms
- chipped or tracking insulators

The Distribution System Inspection and Maintenance Plan is appended to this document as [Appendix E](#). The Field Operations Director is responsible for implementing the plan. The plan includes guidance on specific faulty connections and equipment types that are to be replaced when found. CORE logs the condition of inspected equipment, any problems found, and a scheduled date for corrective action.

Thus far the drone program has been very successful in identifying defects and allowing linemen to spend more time making repairs, thereby expediting the inspection program. The program is currently being operated on a four-year cycle with expected completion in 2026. From there, it will repeat on a six-year cycle.

In addition, inspection of facilities after an outage is also completed to determine the cause of the fault and look for any damage, necessary cover-up, and equipment or connections that pose a risk.

Transmission Line Inspection Program

CORE performs inspections of the transmission facilities on a five-year cycle, which includes video or still photographs of each structure, a written summary of maintenance issues and right-of-way (ROW) issues, and a general report regarding line segment condition with recommendations of major maintenance or rebuild. Patrols are primarily done using drones for the 44kV and 115 kV lines. Due to average equipment age and narrow right of way, CORE's 44kV system in the Pine Junction and Bennett districts will be inspected every year. Inspections include the condition of line structures and attachments, any structural problems and safety hazards, damage to insulators, vibration-dampers, hardware, conductors, static shield wires, optical ground wires, signs of hot spots, vegetation growth, and tower identification signs.

All maintenance issues found during line patrol(s) are rated for severity by a qualified CORE employee or contractor, mitigation is performed, and completion of work is documented.

The Transmission System Inspection and Maintenance procedure is appended to this document as [Appendix F](#). The Field Operations Director is responsible for implementing the procedure.

Wood Pole Testing Program

CORE's wood pole testing program requires all poles to be tested on a twelve-year cycle to determine the structural health of the pole. Poles less than twelve years old require a visual inspection; all others require both above and below ground line inspections. This program replaces or reinforces poles per the test and inspection result recommendations. All findings are documented and reject poles are categorized as non-restorable or restorable, as well as whether that reject pole is priority or non-priority. Timeframes to complete mitigation are established, and mitigation documented.

The Pole Inspection and Maintenance procedure is appended to this document as [Appendix G](#). The Chief Operating Officer is responsible for implementing the procedure.

Vegetation Management Plan

CORE implemented a six-year cycle vegetation management plan in 2014. The plan is reviewed and updated every calendar year. The Vegetation Management procedure is appended to this document as [Appendix H](#). The Field Operations Director is responsible for implementing the procedure.

In addition, CORE utilizes outside consultants periodically to review the plan and provide recommendations for improvement. CORE's Vegetation Management Plan meets a variety of industry Best Management Practices (BMPs); the following lists some of these management practices and how CORE incorporates them into its Vegetation Management Plan.

Best Management Practices

Proactive Trimming (Cycle Trimming)

The intent of CORE's vegetation management program is to address trees and vegetation before they become a problem. Trimming clearance standards require trees to be pruned at a distance that will allow for six years of re-growth before the next scheduled trimming cycle without creating interference. This is typically 10 to 24 feet from conductors, based on average growth rates for individual species.

Reliability-Based Trimming

Recently, more research and practice has been focused on reliability-based vegetation maintenance, which attempts to combine proactive and reactive maintenance techniques. By gathering information from our internal Outage Management System (OMS), post-outage investigations can be conducted to determine the reasons for vegetation-caused interruptions. Documenting tree species and condition, tree failure type, cause of outage, and environmental and weather factors at the time of outage/tree failure can lead to more pointed, reactive maintenance on comparable trees. Additionally, information from the OMS on the worst-performing circuits or devices can lead to more frequent patrols for reactive trimming and clearing before the next scheduled trimming year. The vegetation management staff perform regular reviews of outages and make decisions regarding patrols based on this data.

By the completion of the first six-year cycle in 2020 to inspect and clear vegetation across the entire service territory, CORE has removed overgrown and hazardous vegetation and right-of-ways are trimmed according to industry best practices. Using this as a jumping-off point, more work can be done to schedule reliability-based maintenance while continuing the six-year trim cycle as a backstop.

Mid-Cycle Inspections

The published BMP "Tree Risk Assessment and Abatement for Fire-Prone States and Provinces in the Western Region of North America" (Utility Arborist Association, 2009) suggest that utilities do hazard tree assessments along their utility rights-of-way every three to five years. Since CORE is located in the fire-prone state of Colorado, our Plan will meet this standard with a fourth-year mid-cycle inspection in which inspectors

identify hazardous vegetation conditions that should be addressed immediately, rather than waiting another two years for when they next come up on cycle.

American National Standards Institute (ANSI) A300

All of our utility line clearance contractors follow ANSI A300, Part 1, standards for directional utility pruning. These standards help support proper pruning and tree health while achieving proper clearances between trees and conductors needed between trim cycles.

All of our contracted Job Planners and in-house utility foresters follow ANSI A300, Part 9, standards for Tree Risk Assessment and Utility Tree Risk Assessment. These standards serve as a guide for field personnel to assess tree risk as accurately and consistently as possible. We also strongly encourage our contracted foresters to become ISA Certified Arborists and to obtain the ISA Tree Risk Assessment Qualification.

Contractor Wildland Fire Preparedness and Prevention Plans

All of our utility line clearance contractors are required to provide CORE with their internal Wildland Fire Preparedness and Prevention Plans. These plans detail how workers in the field will respond to incidents that might arise, how to prevent incidents from occurring in the first place, and the training materials and instruction that supervisors uphold. There are also details that specify if and when fire weather conditions escalate, crews are required to stand down from their work.

Operating Plan for USFS

CORE has an Operating Plan for Distribution and Transmission Lines in the USFS, which is appended as [Appendix I](#). This plan addresses vegetation management, noxious weed management maintenance, fire control best practices, and access in forest service areas. The Fire Control section of this Operating Plan requires fire precaution measures to be implemented by CORE workers or contractors based on fire Staffing Class as calculated by the USFS.

Fire Danger	Staffing Class	Precautions to be implemented
Low	1	Normal fire precautions
Moderate	2	Normal fire precautions
High	3	Normal fire precautions, except that smoking is restricted to designated safe areas.
Very High	4	Machine treatment of slash, skidding, loading, and clearing will be shut down from 1:00 p.m. to 9:00 p.m. MDT in high local fire risk areas. Welding will be restricted to areas of mineral soil only.

Extreme	5	Shut down all operations except those on mineral soil. A meeting will be convened to discuss special precautions to be taken prior to resuming selected activities.
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Leveraging Technology in Vegetation Management

In 2021, CORE implemented work planning software by GeoDigital to enhance our Vegetation Management Program. The software allows Job Planners to track spatially referenced work units in real-time as they plan. These units have fields to include detailed notes, as needed. Once assigned, the Contracted Arborists can download the work units to their mobile devices and work offline from both a worklist and a unit map that shows the exact location of work units in relation to their location. This has reduced issues of Arborists not being able to efficiently locate work units and to execute the work according to instructions, which were present prior to the software implementation.

In 2022, CORE conducted a pilot with Overstory, a satellite-imagery and artificial intelligence company. Overstory scanned 300 miles of line in the Pine Junction and Woodland Park Districts that were scheduled for fourth-year inspections in 2022 with a combination of visual and near-IR imaging. The data was then processed by Overstory's AI to generate reports of tree health, height, distance to wires, and more. This enables CORE to inventory tree types, heights, growth rates, and potential of impacting lines and enables us to further tailor our vegetation management program to mitigate our risks.

Overstory has since scanned and analyzed all of CORE's overhead lines, and the data has been used to adjust the cycle timing of certain circuits based on the conditions reported. Circuits with higher encroachment and number of hazard trees are "pulled forward," or moved to an earlier year in the upcoming cycle. To maintain balance of mileage year-to-year, certain circuits where conditions are not as hazardous are "pushed back" to later years in the cycle.

Cycle Evaluations

The Bennett district in the Eastern Plains has transitioned to a four-year trim cycle starting in 2020. This is an effort to reduce cycle-buster trees in an area where there is a higher proportion of fast-growing deciduous trees present. To balance workloads across the service territory, the remaining districts have continued a six-year trim cycle but will be subject to the four-year mid-cycle inspections detailed above. Going forward, CORE will continue to move from a cycle-based program to a conditions-based program as informed by data received through satellite imagery and analytics. They will continue to scan the distribution system and recommend the circuits most in need of Vegetation Management based on their analytics.

Clearing of Poles with Equipment

Clearing a 10-foot radius around poles with equipment is part of CORE's ROW Trimming Standards:

*“Remove trees and brush around poles with overhead switches, transformers, fuses, reclosers, sectionalizing equipment and guy wires within a 10-foot radius of the pole.”
(Part VII, Removal; Section B. Tree Removal Conditions, Item 5)*

This has been expanded to include poles with jumpers and other connections.

System Hardening

CORE is hardening its system through the implementation of updated standards. CORE continuously evaluates the design, equipment, and construction standards used, focusing on both reducing potential ignition sources and making reliability improvements. In addition, new hardening opportunities are being evaluated. Utilizing the fire risk maps that have been developed for the system, new standards, equipment, and pilot projects can be focused on high-risk areas.

Design and Construction Standards

CORE's current design and construction standards address risks associated with the ignition of fires.

1. Pole strength is designed based on the high wind and snow load conditions we face in our service territory, which reduces the risk of pole failure.
2. CORE's standard design includes using 10' cross-arms to mitigate raptor issues, but it also increases conductor spacing, which reduces the likelihood of wire-to-wire contact in high-wind conditions. Stronger fiberglass arms are being used, which reduces fire risk by reducing the chances of crossarm failure.
3. Polymer insulators are also being used to replace porcelain on sections of line susceptible to contamination and/or damage.
4. CORE has identified the small #6 copper weld conductor on our system and has been systematically replacing this conductor with priority focused on the high fire risk areas.
5. Each new construction and upgrade project located in high-risk fire areas is being evaluated with respect to where the project can be installed underground versus overhead where practical.
6. Standards include cover-up of energized parts that an animal or bird could contact, resulting in a potential ignition, while standing on a grounded surface. CORE is also working to replace grounded metal standoff brackets with fiberglass in an attempt to insulate equipment. Equipment jumpers utilize insulated wire where possible for improved cover-up application and durability.
7. Design standards have been updated to eliminate the use of specific connections that are known to fail, such as universal hot-line stirrups.
8. CORE has standardized on envirotemp FR3 fluid, which is derived from renewable vegetable oils providing improved fire safety, transformer life, loadability, and environmental benefits for pad mount units.
9. CORE is evaluating the cost, benefits, and risks associated with using insulated conductor on overhead lines in high fire risk areas.
10. CORE continues to evaluate and assess evolving technologies, piloting new approaches where practicable.

CORE's Standards Committee is responsible for developing the design and construction standards with a focus on wildfire prevention.

System Protection

The system protection philosophy associated with high fire risk areas is evaluated by the Engineering Planning department. Planning is responsible for making protection system modifications to address high fire risk areas. Utilizing data from the Outage Management System that reports on outage type and cause, analysis is performed to determine worst performing feeders and the outage causes. This metric is used in tandem with wildfire risk to prioritize feeders for pilot projects aimed at reducing risk. Areas of focus for system protection are as follows:

OCR Replacement Program

CORE is currently implementing a plan to replace hydraulic oil devices with electronic protection devices, which do not require oil and have the capability of being put on different settings during high fire danger. This will be accomplished remotely with future distribution automation functionality, but currently requires a CORE employee to travel to the device and manually change the settings. The primary motivation to replace these devices is that oil-filled reclosers are sensitive to temperature and do not clear faults on their time-current curve (TCC) as well as electronic reclosers during colder weather, and OCR's do not provide fault data that we can get from new reclosers. Furthermore, traditional oil-controlled reclosers have the potential to fail catastrophically and present a significant ignition risk if they were to do so. Versa-Tech reclosers are being used on 3-phase feeders and TripSaver reclosers have been installed on single-phase taps.

The program completed its initial phase of implementation in 2024 with the feeders in the eastern Sedalia District. After completion of replacement, there is a transition into an inspection program where the new devices will be tested and upgraded as downstream loading requires.

Fuse Replacement Program

CORE has replaced traditional fuses with non-expulsion current-limiting fuses on several of the highest risk feeders. The current expulsion fuses use a silver-link element in an arc tube that vents gas and possibly molten metal to extinguish an arc resulting in a possible source of fire ignition. The non-expulsion fuses are non-venting and therefore minimize this risk.

Similarly, in other areas, CORE is implementing N-type fuses, which are still an expulsion-type fuse but are much faster than T-type fuses. This speed allows the N-fuse to arrest an arc much faster than their older counterparts, further reducing risk of ignition by limiting the amount of time potential fuels may be exposed to electrical energy.

High Impedance Fault Detection

A number of techniques and technologies are being evaluated for improved high-impedance fault detection and the clearing of low current fault conditions.

We have a pilot project aimed at improving sectionalization and sensitivity of protection devices. The purpose of this pilot is to test the concept of setting fault current thresholds of downline reclosers and sizing fuses as close to peak load as possible and tripping as fast as possible on high-impedance faults – in essence, a fuse-blow scheme. Furthermore, it will explore the practice of setting a downline recloser to hotline tag when Alternate Relay Settings are activated during high fire danger. Increased sectionalization is expected to offset negative impacts of more sensitive devices by reducing the size of outages that occur or by providing visual open points to expedite patrols.

Implementation of New Technology

CORE continues to explore innovative technologies to reduce wildfire risk and invest in grid-modernization projects. With the deployment of the Advanced Metering Infrastructure (AMI) system, CORE is receiving real-time meter data at the account level that has been helpful in identifying potential issues and outage causes. Furthermore, the AMI system enables CORE to build a robust communications network that will be leveraged to implement future technologies. In addition, line sensor technology from Sentient Energy provides system status information to the operators to locate faults more quickly.

These technologies as well as Pano AI and Technosylva are some of the recently added tools that are instrumental in CORE's efforts to mitigate wildfire risks and consequences throughout the system and territory we serve. The pilot programs described above exemplify CORE's commitment to continual improvement in this regard.

Workforce Training

CORE field personnel are trained in the fire suppression gear that they have available. Additional training is provided on inspection plans, outage response, and wildfire response. They have also been trained on potential fire risks and are required to address wildfire risks during each job briefing. All field personnel receive training annually on recognizing and reporting electric utility facilities ignitions, and methods to reduce risks.

Metrics and Reporting

In order to evaluate the effectiveness of the Plan and enable continual improvement, CORE tracks the following metrics monthly:

- Number of Red Flag Warnings Days in the CORE service territory
- Number of days during which Alternate Relay Settings are enabled

- Number of outages incurred while on Alternate Relay Settings, and number of those outages for which a cause was found
- Number of specific outage types commonly associated with ignitions (Vegetation Contact, Animal Contact, Lightning, and Equipment Failure)
- Number of outages that include a primary wire contacting the ground
- Number of ignitions caused by CORE equipment
- Number of Drone Inspections completed in each district
- Number of Foot Patrols completed in each district
- Number of repairs completed on the overhead distribution system in each district
- Number of inspections of wooden poles completed in each district
- Progress of Vegetation Management Task Cycle in each district
- Progress of Vegetation Management Mid-Cycle inspections in each district

These metrics are reported at the first Wildfire Steering Committee meeting of the calendar year.

Ignition Tracking

In 2023, CORE began systematically tracking and analyzing ignition events caused by the distribution system. Linemen are instructed to file an Ignition Reporting Form through CORE's EHS Insight software any time they discover evidence of burning, charring, or fire where CORE equipment is the apparent source of energy. This process is to identify the most common causes of ignition and prioritize efforts and funds to mitigate those factors. The data is also useful in generating probabilities of ignition for different types of outages during specific weather conditions. The data being captured in the ignition reporting process includes:

- Incident date and location
- Weather conditions and wildfire risk for the location and date
- Underlying wildfire risk rating
- Outage information
- Fire size, fire fighter response
- Lineman's description of events and apparent cause of ignition (outage cause)
- Explanation of root cause of ignition, which may be different from outage cause
- Recommended mitigations and actions taken to reduce ignition risk

This data is compiled and presented in the annual report that is presented to the Wildfire Steering Committee.

Wildfire Steering Committee

CORE fosters a wholistic approach to wildfire mitigation by engaging diverse perspectives from multiple business units through the Wildfire Steering Committee. The Committee, led by the Wildfire Mitigation Manager, meets monthly and is comprised of subject matter experts from Engineering, Operations, GIS, Safety, and Enterprise Risk

Management. The group review various programs and policies being implemented at CORE, specific ignition events, and new techniques and technologies to improve wildfire risk mitigation. New methods are assessed, pilot programs are developed to test for efficacy, and committee members assist in planning and implementing these programs through their departments. This interdepartmental collaboration is crucial to the success of CORE's Wildfire Mitigation Program.

Member and Public Outreach

CORE prioritizes communication and outreach as an integral part of its wildfire mitigation plan. This is not only to assure our members of the efforts being taken to reduce risk and improve reliability, but also to enhance our collaboration with local governments, emergency management agencies, and local land management groups.

CORE has developed improved messaging to members that includes our vegetation management program and the importance of being able to clear our right-of-way and remove hazard trees outside the right-of-way. In addition, CORE has been meeting with municipalities, cities, counties, and towns to discuss our wildfire mitigation efforts, emergency management and preparedness, and our PSPS procedure. The Wildfire Mitigation Manager (WMM) regularly attends community events to present and distribute printed materials about the Wildfire Mitigation Program to the membership.

Additionally, the WMM is an active member of the Douglas County Wildfire Action Collaborative, the Fire Adapted Colorado (FACO) Network, and the International Wildfire Risk Mitigation Consortium (IWRMC). CORE also supports planning and facilitation of the Colorado Utilities Wildfire Consortium and regularly presents at its annual summit. In 2025, the WMM co-facilitated a PSPS Tabletop Exercise that included utilities and public safety partners from across the state, a novel and highly beneficial experience for many of the participants, based on feedback received.

Furthermore, the WMM is heavily engaged within the utility wildfire community nationally. This role is responsible for presenting at conferences all over the United States and shares CORE's wildfire mitigation strategies with other utilities that are more nascent in their wildfire mitigation programs.

A public-facing webpage on www.CORE.coop provides members with information regarding CORE's wildfire mitigation plan and the efforts CORE is taking to mitigate wildfires. We will continue utilizing social media to provide information to members notifying them when areas of our system are under red flag warnings and when we plan to implement Alternate Relay Settings.

In the event that CORE leadership determines a PSPS is warranted, numerous efforts will be made to contact members and agencies with jurisdiction affected by event. The communication plan can be found within the PSPS Procedure attached as [Appendix C](#).

Emergency Response

Wildfire Response Procedure

CORE has a Wildfire Response procedure that provides the processes to follow in the event of wildfire within our service territory. This procedure is attached as [Appendix J](#). This procedure identifies roles and responsibilities, actions to be taken, communications protocols with incident command centers, documentation to be gathered in relation to any event, and reporting requirements.

In the event that CORE offices require evacuations, procedures are in place that detail evacuation plans, equipment staging areas, relocation to other facilities such as a backup control center or other office locations.

Appendix A – Red Flag Email

Appendix B – Alternate Relay Settings Procedure

Appendix C – Public Safety Power Shutoff Procedure

Appendix D – Job Briefing

Appendix E – Distribution System Inspection and Maintenance Plan

Appendix F – Transmission System Inspection and Maintenance Plan

Appendix G – Pole Inspection and Maintenance Plan

Appendix H – Vegetation Management Plan

Appendix I – USFS Operating Plan

Appendix J – Wildfire Response Procedure

Appendix K – Pano Case Studies

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