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October 9, 2026

Leah Mohr
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

RE: Wildfire Mitigation Plan Docket No. EL26-

Dear Ms. Mohr:

MidAmerican Energy Company (MidAmerican) respectfully submits the following documents in accordance with South Dakota Codified Laws § 49-49-2:

- Attestation of Nick Nation
- MidAmerican's Wildfire Mitigation Plan to be published on the Commission's website.

Please contact me if you have any questions regarding this filing.

Sincerely,

Regan Kunzman
Disaster Mitigation Director
Regan.Kunzman@MidAmerican.com
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Enclosure by electronic filing

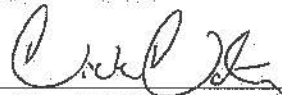
**ATTESTATION OF COMPLIANCE
WILDFIRE MITIGATION PLAN REQUIREMENTS**

To: South Dakota Public Utilities Commissioners and Staff (the "Commission")

The undersigned authorized officer of MidAmerican Energy Company hereby states as follows:

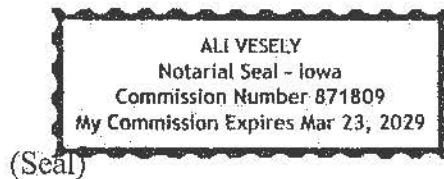
1. MidAmerican Energy Company has prepared a Wildfire Mitigation Plan and submits the same herewith to the Commission for publication.
2. I am an officer of the Qualified Utility with responsibility for operations including wildfire planning and restoration. The Qualified Utility's Wildfire Mitigation Plan was prepared at my direction and I am familiar with the facts and circumstances and the conclusions.
3. I am able and do affirm that the Wildfire Mitigation Plan as submitted is valid and current and the procedures and standards comply with the 2023 National Electrical Safety Code. *I certify* that the Wildfire Mitigation Plan contains all provisions required by South Dakota Codified Laws § 49-49-2.

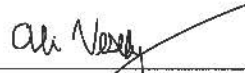
Whereupon, Nick Nation, Senior Vice President, Delivery, verifies the statements contained in the attestation are true to the best of *my* knowledge and belief.



Authorized Officer

Subscribed and sworn to before me this 6 day of OCTOBER 2026.





NOTARY PUBLIC

Notary print name: Ali Vesely

My commission expires: March 23, 2029

Prepared By:
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2026-2028

SOUTH DAKOTA WILDFIRE MITIGATION PLAN



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ACRONYMS AND ASSOCIATED DEFINITIONS

BI – Burning Index

A fire danger index used to estimate the potential intensity of a wildfire and the corresponding effort required for containment. The index incorporates both the expected rate of fire spread and the potential heat output of available fuels, providing an indication of probable flame length and suppression difficulty. Higher BI values are associated with increased wildfire potential and more challenging firefighting conditions.

CRI – Composite Risk Index

A quantitative metric used to evaluate relative wildfire risk by combining the likelihood of an ignition event with the potential consequences of that event. The index supports prioritization of mitigation activities and investments.

ERC – Energy Release Component

A National Fire Danger Rating System (NFDRS) index that quantifies the potential heat energy available within the flaming front of a wildfire based on the moisture content of live and dead fuels. ERC serves as an indicator of fuel dryness and potential fire intensity, with higher values reflecting increasingly dry fuel conditions, greater available energy and the potential for more severe wildfire behavior. Because it incorporates the cumulative effects of seasonal drying, ERC is commonly used to assess longer-term wildfire risk and drought-related fire potential.

ESS – Enhanced System Settings

A set of modified protection and operational settings designed to reduce wildfire ignition risk during elevated fire weather conditions. Enhanced System Settings may include changes to protection device sensitivity, fault-clearing times and reclosing operations.

FLIR – Forward-Looking Infrared

Imaging technology used to detect heat signatures and temperature anomalies in electrical equipment and infrastructure that may not be visible to the naked eye.

IC – Ignition Component

A National Fire Danger Rating System (NFDRS) index that estimates the likelihood that an ignition source, such as an ember or firebrand, will ignite available fuels and result in a wildfire requiring suppression response. The index reflects the influence of fuel moisture, weather conditions and fuel receptiveness on ignition potential. Higher IC values indicate increased wildfire ignition risk and may support heightened situational awareness and wildfire mitigation decision-making.

JSA – Job Safety Analysis

A systematic process used to identify potential hazards associated with a specific work activity and establish appropriate controls to reduce risks to personnel, the public and company assets.

kV – Kilovolt

A unit of electrical potential equal to 1,000 volts, commonly used to describe transmission and distribution system operating voltages.

MISO – Midcontinent Independent System Operator

The regional transmission organization responsible for coordinating the reliable operation of the bulk electric system and wholesale electricity markets across portions of the Midwestern United States, including MidAmerican Energy Company's service territory.

NESC – National Electric Safety Code

A nationally recognized safety standard that establishes requirements for the design, construction, operation, maintenance, and inspection of electric supply and communication systems, including substations and overhead and underground infrastructure, to protect utility personnel and the public.

NFDRS – National Fire Danger Rating System

A nationally recognized fire danger assessment framework that utilizes weather observations and fuel condition data to characterize wildfire potential and support risk-informed operational decision-making. NFDRS outputs, including indices such as ERC, SC, IC and BI, are commonly used to evaluate fire weather conditions, situational awareness and wildfire risk trends that may inform utility wildfire mitigation activities.

NOAA - National Oceanic and Atmospheric Administration

A federal agency within the U.S. Department of Commerce responsible for monitoring and forecasting weather, climate, oceans and atmospheric conditions. NOAA provides meteorological, hydrological and climate data that support public safety, emergency management, environmental stewardship and operational decision-making.

NWS – National Weather Service

A federal agency within the National Oceanic and Atmospheric Administration (NOAA) that provides weather forecasts, warnings and meteorological data used to support operational decision-making.

PSPS – Public Safety Power Shut-off

A temporary, proactive de-energization of electrical facilities in targeted areas during extreme weather or wildfire conditions to reduce the risk of utility-related wildfire ignition and enhance public safety.

ROW – Right-of-Way

The land corridor occupied by utility infrastructure and maintained to provide safe operation, system reliability and access for construction, inspection, maintenance and emergency response activities.

SC – Spread Component

A National Fire Danger Rating System (NFDRS) index that estimates the potential rate at which a wildfire may spread under prevailing fuel and weather conditions. The index incorporates factors such as wind and fuel moisture to characterize fire growth potential and support wildfire risk assessment, operational planning and situational awareness. Higher SC values indicate an increased likelihood of rapid fire spread and more challenging suppression conditions.

SCADA – Supervisory Control and Data Acquisition

A system of hardware and software used to remotely monitor, control and collect real-time operational data from electric utility infrastructure.

SFDI – Severe Fire Danger Index

A fire weather risk indicator that incorporates meteorological and environmental conditions to assess the potential for wildfire ignition and spread. The index is used to support operational wildfire mitigation decisions.

WMP – Wildfire Mitigation Plan

A comprehensive plan that describes a utility's strategies, programs and operational practices for reducing wildfire risk, enhancing situational awareness, improving system resilience and protecting public safety.

WUI – Wildland-Urban Interface

The geographic area where human development and infrastructure are adjacent to or intermingle with undeveloped vegetation, resulting in increased wildfire exposure and risk.



EXECUTIVE SUMMARY

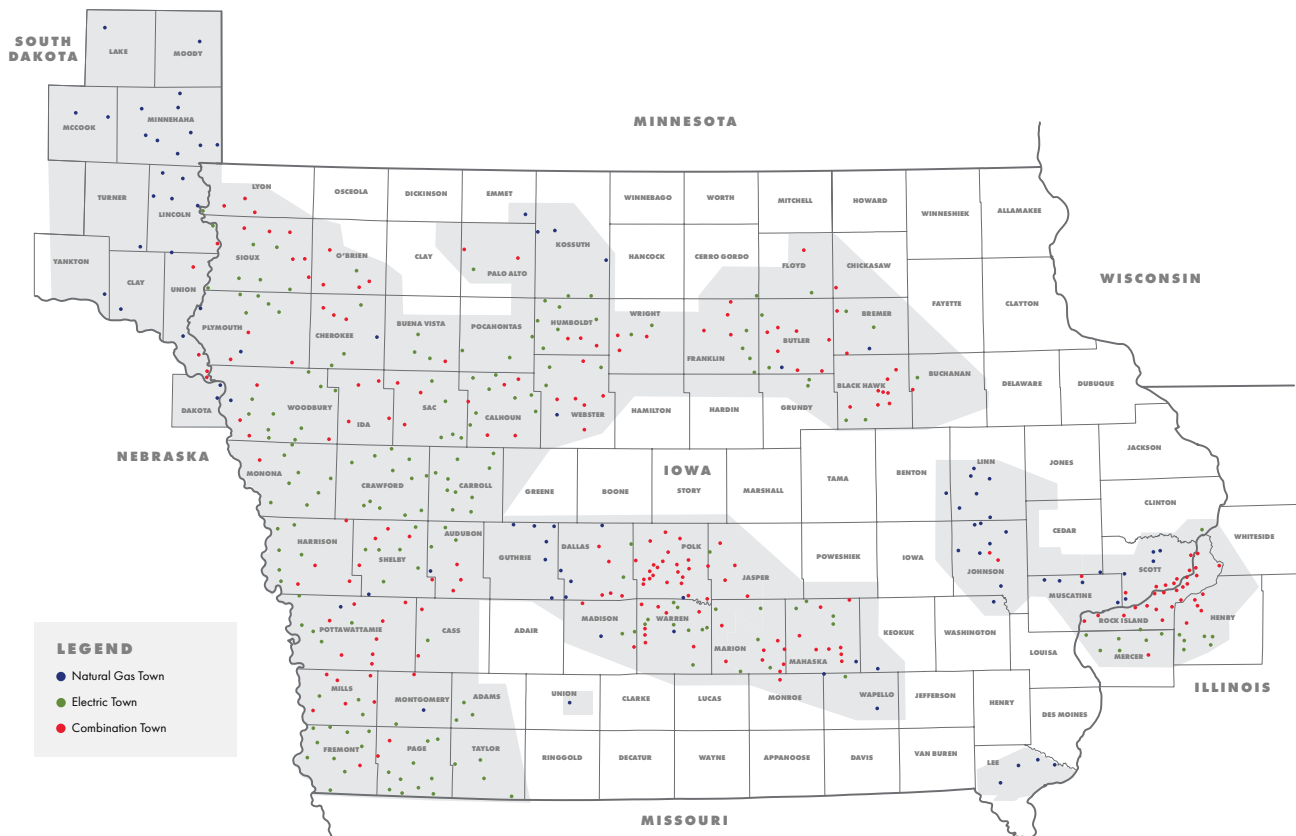
EXECUTIVE SUMMARY



1.0 EXECUTIVE SUMMARY

MidAmerican Energy provides electric and natural gas services in Iowa, Illinois and South Dakota, as well as natural gas services in Nebraska, as illustrated in Figure 1. In South Dakota, MidAmerican serves approximately 117,000 electric and natural gas customers across 30 southeastern South Dakota cities, including communities such as Sioux Falls, Yankton, Jefferson, Alcester, Dakota Dunes and North Sioux City. The families, farms and businesses served in South Dakota are part of the 1.6 million customers across MidAmerican's entire service territory.

Figure 1: MidAmerican Energy Service Territory Map





MidAmerican consistently provides safe, reliable and resilient electricity to its customers. While electric reliability focuses on reducing interruptions and ensuring customers have power, resilience focuses on the ability of an electric grid to recover from small and large-scale events and to reduce damage and outage durations during these events. Reliable access to utility facilities is essential to maintaining system resilience and supporting safe operations. Because these facilities are located on both public and private property, MidAmerican secures and preserves access through legally established rights-of-way (ROW), including easements and other agreements with landowners. These arrangements provide the access necessary to inspect, operate, maintain, repair and upgrade infrastructure as needed to support reliable service.

To meet the ever-increasing need for electricity, power must be reliable and the grid must be resilient to be able to withstand the impacts of extreme weather-related events and wildfires. Wildfire is a concern for all utility companies, even in the Midwest, as there is the potential of a fire starting because of sparks emitted from electrical facilities, typically when a fault occurs.

Although South Dakota does not experience the same wildfire behavior as western mountainous states, it still faces some wildfire risk. Grasslands, agricultural fuels, shelterbelts, riparian corridors, drought conditions and high-wind events can lead to fast-moving fires capable of threatening communities and utility infrastructure. MidAmerican is committed to implementing policies and making long-term investments to reduce the risk of ignitions by including mitigation efforts specific to this risk throughout the Wildfire Mitigation Plan (WMP).

This WMP focuses on the opportunities that most significantly reduce wildfire risk. As shown in Table 1, most of MidAmerican's electric infrastructure is overhead, and overhead lines pose the greatest wildfire risk, so a majority of this WMP focuses on these facilities.

TABLE 1: APPROXIMATE LINE MILE TOTALS AS OF MARCH 2026

Facility Type	Line Miles	Line Miles in South Dakota	High-Risk Line Miles	High-Risk Line Miles in South Dakota
Transmission Overhead	4,948	23	17.75	1.13
Transmission Underground	6	0	0	0
Distribution Overhead	18,305	89	149.997	0
Distribution Underground	7,464	88	0	0
Total	30,723	200	167.747	1.13

This WMP was developed to provide a risk-based, South Dakota-specific framework for reducing the likelihood that MidAmerican's electric facilities could contribute to a wildfire ignition, while maintaining safe, reliable and affordable electric service. The plan is grounded in a wildfire risk assessment, enhanced inspection and vegetation management standards, expanded operational practices during elevated fire weather and coordination with public safety partners. Because MidAmerican's identified elevated wildfire exposure in South Dakota is limited, the plan emphasizes targeted application of enhanced mitigations, clear triggers for operational changes and a commitment to amend or update the plan as future risk assessments, system changes or regulatory expectations evolve.



SOUTH DAKOTA WILDFIRE MITIGATION PLAN

FULL REPORT

2.0 WILDFIRE RISK ASSESSMENT

MidAmerican hired a third-party wildfire technology company focused on fire ignition risk and fire consequence models to conduct a targeted risk assessment on all electric distribution and transmission facilities. Overhead circuits were assessed using data related to reliability, climatology, fuels, topography, timber and structures like homes and businesses near facilities, including 112 overhead lines miles within MidAmerican’s South Dakota service territory. The risk assessment methodology utilized a composite risk score calculated by combining ignition probability with a consequence score. The consequence score evaluated the potential impacts of a fire event, including effects on forested resources, structures, agricultural lands and other environmental assets. This calculation and associated fire risk tiers/levels are illustrated in Figure 2.

FIGURE 2: FIRE RISK CALCULATION AND RISK LEVEL TABLE

IGNITION PROBABILITY x FIRE CONSEQUENCE = FIRE RISK SCORE/TIER

Risk Tier	Risk Level	Action
3	High-Risk	Address
2	Moderate-Risk	Monitor
1	Low-Risk	Routine Programs

This assessment was designed to compare risks within MidAmerican’s system and determine where to focus attention first. It supports relative prioritization rather than absolute safety determinations. Therefore, the assessment should not be interpreted as a guarantee that an asset, area or condition is either safe or unsafe in terms of wildfire risk.

MidAmerican has 89 miles of overhead distribution circuits and 23 miles of overhead transmission circuits within its South Dakota territory. As shown in Figure 3, all overhead distribution conductors in this part of the service territory have been deemed low or moderate risk related to wildfires. The high-risk area depicted in Figure 3 is limited to a transmission line segment; additional details regarding this segment are provided on the following page.

FIGURE 3: OVERHEAD CIRCUITS IN SOUTH DAKOTA

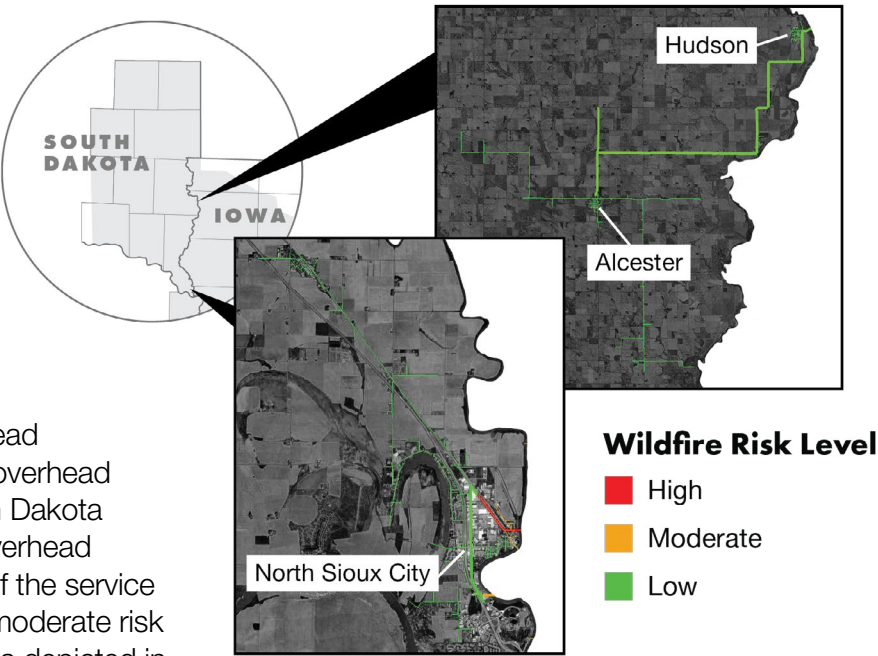
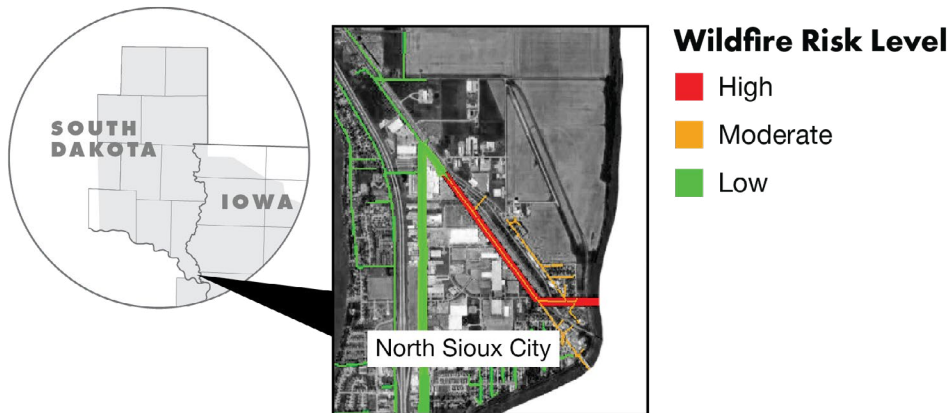


FIGURE 4: HIGH-RISK TRANSMISSION LINE S73 IN SOUTH DAKOTA



There is approximately one mile of overhead transmission line in North Sioux City, South Dakota shown in Figure 4 that is considered high-risk. Within this plan, some wildfire mitigation policies and practices address all areas, while others are specific to high-risk circuits and will therefore have varying degrees of impact on communities. While all wildfire mitigation policies would apply to this circuit that crosses state lines into South Dakota, customers will likely not notice any impacts of mitigation efforts due to the limited miles of conductor in South Dakota and the networked configuration of the transmission system serving the area.

In addition to the quantitative risk associated with wildfire in its service territory, MidAmerican considered other qualitative factors when assessing the overall risk. These factors include potential response times from fire agencies and environmental factors present in MidAmerican's service territory, such as accessible roads and limited areas that are considered wildland urban interface (WUI). WUI refers to places where homes and neighborhoods are adjacent to or mixed within natural, undeveloped vegetation like forests and grasslands. These areas are at higher risk of wildfires (U.S. Forest Service – Geospatial Data Discovery).



3.0 OVERVIEW OF WILDFIRE MITIGATION PLAN (WMP)

3.1 PLAN OBJECTIVES

MidAmerican has implemented multiple programs to address prevention, mitigation and response to wildfires. All aspects of the WMP have been prepared in compliance with the National Electric Safety Code (NESC). The WMP summarizes and builds upon the existing programs such as inspections and correction protocols as well as vegetation management efforts to address this emerging risk. It also includes best practices in the industry and is based on a professional risk assessment. The efforts illustrated within the plan will continue to advance the overall protection and resilience of MidAmerican's grid through prevention, mitigation and response efforts specific to wildfires.

The primary objectives of the plan include:

- ▶ Enhancing public safety associated with wildfire risk
- ▶ Improving the resilience of MidAmerican's electric delivery system
- ▶ Reducing risks associated with wildfires

3.2 PLAN DEVELOPMENT AND METHODOLOGY

A foundational element of the development of MidAmerican's WMP was engagement with internal and external subject matter experts, industry stakeholders, peer utilities and professional organizations. The plan incorporates lessons learned, industry best practices and evolving approaches to wildfire prevention, mitigation, preparedness and response. Input was obtained from internal technical experts, utility professionals with expertise in grid resilience and wildfire mitigation, emergency management practitioners and industry trade associations. This collaborative approach enabled MidAmerican to strengthen and expand existing resilience initiatives while identifying opportunities for continuous improvement.

The WMP provides the governance framework, strategic direction and implementation methodology for wildfire mitigation activities across the Company. It encompasses existing operational programs and practices, enhancements to those programs and new initiatives developed to address emerging wildfire risks. The plan was informed by cross-functional expertise within MidAmerican, external utility professionals experienced in wildfire mitigation and recognized industry organizations to ensure alignment with current industry practices and risk management principles.

The plan incorporates numerous existing programs that support safe, reliable and resilient electric service delivery, including inspection and maintenance activities, vegetation management practices and corrective action programs designed to meet

applicable regulatory requirements and industry standards. These programs are supported by operational practices consistent with utility industry best practices and are intended to maintain system integrity while reducing wildfire risk.

Consistent with MidAmerican's commitment to continuous improvement, the plan identifies enhancements to existing programs and practices based on ongoing risk assessments, operational experience, technological advancements and emerging industry knowledge. For example, existing vegetation management cycles were adjusted on higher-risk circuits to further reduce the potential for vegetation-related ignitions and improve system resilience.

The plan also outlines recent programs, policies and operational strategies established to address evolving wildfire risk conditions. These initiatives include enhanced situational awareness capabilities, risk-informed system hardening investments and operational tools such as Public Safety Power Shut-off (PSPS) protocols where warranted to protect public safety. As wildfire science, technologies and industry practices continue to evolve, MidAmerican will periodically evaluate, refine and expand these measures to further strengthen the effectiveness of its wildfire mitigation program.

3.3 ACTION PLAN

Throughout this plan, MidAmerican's existing reliability, compliance and resilience programs are outlined in detail. Many of these programs are ongoing and occur on a defined cycle. These programs assisted in the identification of enhancements that will be implemented to further protect the grid from contributing to wildfire risk and improve resilience during wildfire events. Additionally, focusing on wildfire provides an opportunity to develop new policies, programs and initiatives specific to this emerging risk. The action plan encompasses all existing, enhanced and new initiatives that are identified throughout the plan. A summary of all efforts grouped by wildfire mitigation categories of Inspection and Correction, Vegetation Management, System Hardening, Field and System Operations, Situational Awareness, and Engagement and Outreach can be found in Table 2.

TABLE 2: WMP ACTION PLAN

Mitigation Category	Action Item	South Dakota 2026-2028 Status
Inspection & Correction	Increased inspections	Applies to high-risk transmission segment as applicable
	Expedited correction times	Applies to high-risk transmission segment as applicable
	Pole test and treat	Applies to all circuits in MidAmerican's service territory
Vegetation Management	Increased trimming	Applies to high-risk transmission segment as applicable
	Expedited correction times	Applies to high-risk transmission segment as applicable
	Expanded clearances	Applies to high-risk transmission segment as applicable
System Hardening	Replace aging transmission poles with non-wood structures	Any poles identified for replacement on all transmission circuits as appropriate
	Replace high-risk poles	All circuits on routine schedule once identified
Field & System Operations	Modified field practices	Applies when conditions are present in the South Dakota service territory
	Enhanced system settings	Applies to high-risk transmission segment as applicable
	Public safety power shut-offs	Not currently expected in South Dakota due to no high-risk distribution circuits
	Encroachment de-energization	Applies when conditions are present in the South Dakota service territory

TABLE 2: WMP ACTION PLAN (CONTINUED)

Mitigation Category	Action Item	South Dakota 2026-2028 Status
Situational Awareness	Fire weather monitoring	Applies to all circuits in MidAmerican's service territory
	Controlled burn de-energization and/or shutdown planning	Applies when conditions are present in the South Dakota service territory
	Wildfire risk assessment	Applies to all circuits in MidAmerican's service territory
	Install weather stations	Applies to South Dakota, as a weather station will be installed in an area with overhead electric facilities
Engagement & Outreach	Targeted communications to customers served by high-risk circuits	Not currently implemented in South Dakota unless future assessment changes
	Outreach to community leaders and public safety partners where there are high-risk circuits	Not currently implemented in South Dakota unless future assessment changes
	Increase overall awareness of wildfire mitigation program	Applies to all customers in MidAmerican's service territory

4.0 WILDFIRE MITIGATION PLAN (WMP)

The WMP focuses on specific efforts in the areas of Inspection and Correction, Vegetation Management, System Hardening, Field and System Operations, Situational Awareness, and Engagement and Outreach. The plan also provides cost estimates for wildfire expense from 2026 and forecasted expense for subsequent years. Some mitigation measures described in this plan are enterprise-wide practices or policies that may be applied in South Dakota if future risk assessments identify additional high-risk circuits. While no high-risk distribution circuits currently exist in South Dakota, certain enhanced measures, such as public safety power shut-offs (PSPS) and enhanced system settings (ESS), are described as available mitigation tools but are not currently expected to be implemented in South Dakota during the 2027–2028 plan period.

4.1 INSPECTION AND CORRECTION

MidAmerican completes comprehensive inspection and correction efforts to monitor its facilities and address any issues identified that may impact safety, reliability or resilience. These efforts cover transmission and distribution facilities.

4.1.1 DISTRIBUTION

MidAmerican's distribution infrastructure is comprised of approximately 18,000 miles of overhead line of varying voltages in the 15 kV class. In South Dakota, the overhead distribution lines cover 89 miles. MidAmerican's distribution asset inspections are outlined in Table 3.

- ▶ **Visual Inspection** – A thorough patrol and inspection is performed on a 10-year cycle. During this inspection, all overhead and underground equipment is inspected for potential conditions. These patrols are typically done by walking or driving as required; drone inspections may also be utilized, as necessary. For high-risk circuits, visual inspections will be conducted every five years.
- ▶ **Pole Test and Treat** – To proactively identify poles that require replacement, a below grade inspection is completed on approximately five percent of MidAmerican's entire fleet of wood distribution poles. As part of the program wood poles are visually inspected. Additionally,



Example of Image from a Drone Inspection

testing may include sounding, boring and ground line exposure to identify defects and decay. This program uses a combination of visual field inspections and pole integrity testing to estimate the remaining lifespan of the poles. Poles identified by the program are categorized by remaining predicted life and replaced accordingly. Wood poles will be treated if they are inspected and found to be in sound enough condition to warrant treatment.

- **Thermography Inspection** – In addition to routine patrols, when distribution lines and structures have a history of undetermined trips, forward-looking infrared (FLIR) cameras are used to identify areas of increased temperatures or hot spots that are undetectable to the human eye, indicating potential concerns of equipment failure or malfunction. Drone inspections may also be utilized to identify overheating equipment and for areas difficult to reach on foot, as necessary. Thermography inspections are used on an adhoc basis and on all high-risk distribution circuits. Because there are no high-risk distribution facilities located in South Dakota, this technology would only be utilized on an as-needed basis.

TABLE 3: DISTRIBUTION INSPECTION PROGRAM OVERVIEW

Inspection	Method	Timeframe	Frequency	Frequency on High-Risk Circuits
Visual	Walking/Ground/ Drone	Year-round	Every 10 years	Every 5 years
Pole Test & Treat	Walking/Ground	Year-round	Five percent of poles	Every 20 years
Thermography	FLIR and/or Drone	Year-round	As needed	Every 10 years

All conditions identified by the inspection program are investigated and prioritized. Deficiencies are targeted for remediation within the following calendar year unless immediate action is required. Progress and actions are tracked in MidAmerican’s work management system. In addition, emergency conditions identified during these patrols are addressed while onsite. For non-emergency conditions found on high-risk circuits, remediation is completed on a shorter timeframe as defined in Table 4.

TABLE 4: DISTRIBUTION CORRECTION TIMEFRAMES

Condition Priority	Correction Timeframe	Correction Timeframe on High-Risk Circuits
Emergency	Immediately	Immediately
All Others	End of following calendar year after receipt	Within 6 months of receipt

4.1.2 TRANSMISSION

MidAmerican's transmission infrastructure is comprised of approximately 5,000 miles of lines of varying voltages. In South Dakota, the overhead transmission lines cover 23 miles. To ensure the safe operation of this high-voltage infrastructure, a variety of patrols are completed on all transmission lines throughout the year. These routine patrols are illustrated in Table 5 and include:

- ▶ **Aerial Visual Inspection** – A visual patrol using a helicopter is completed at least annually for all transmission facilities. During these inspections, all poles, hardware and equipment are inspected for potential conditions. For high-risk circuits, aerial inspections are conducted biannually.
- ▶ **Visual Groundline Inspection** – A groundline patrol is performed once every 10 years for all transmission facilities. During this inspection, all poles, hardware and equipment are inspected for potential conditions. For high-risk circuits, walking inspections will be conducted every five years.
- ▶ **Pole Test and Treat** – To proactively identify poles that require replacement, all transmission wood poles will be inspected. As part of the program, all wood poles are visually inspected, sounded and bored for defects and decay. This program uses a combination of visual field inspections and pole integrity testing to estimate the remaining lifespan of the poles. Poles identified by the program are categorized by remaining predicted life and replaced accordingly. Wood poles will be treated if they are inspected and found to be in sound enough condition to warrant treatment.
- ▶ **Thermography Inspection** – In addition to routine patrols, when high-voltage lines and structures have a history of undetermined trips, forward-looking infrared (FLIR) cameras are used to identify areas of increased temperatures or hot spots that are undetectable to the human eye, indicating potential concerns of equipment failure or malfunction. Drone inspections are also utilized to identify overheating equipment and for areas difficult to reach on foot, as necessary. Thermography inspections are used on an adhoc and on all high-risk transmission circuits.
- ▶ **Comprehensive Structure Inspections (CSI)** – Comprehensive structure inspections provide a close-up view of transmission line hardware. With this close-up inspection, potential conditions can be identified more readily than through a flying visual or thermography inspection. A sample of structures on high-risk transmission circuits will have a comprehensive structure inspection each year. The company may expand the number of structures patrolled as needed.



Example of loose hardware found during comprehensive structure inspection

TABLE 5: TRANSMISSION INSPECTION PROGRAM OVERVIEW

Voltage	Type of Inspection	Timeframe	Frequency	Frequency on High-Risk Circuits
34.5 kV	Aerial/Helicopter	Spring	Annually	Biannually
69 kV	Aerial/Helicopter	Spring	Annually	Biannually
161 kV	Aerial/Helicopter	Spring and fall	Biannually	Biannually
345 kV	Aerial/Helicopter	Spring and fall	Biannually	Biannually
All Voltages	FLIR and Drone	Year-round	As needed	Annually
All Voltages	Walking/Ground	Year-round	Every 10 years	Every 5 years
All Voltages	CSI	Year-round	As needed	Annual Sample or as needed

All conditions identified by the inspection program are investigated and prioritized. Deficiencies are targeted for remediation within the timeline associated to each priority level. Progress and actions are tracked in MidAmerican's work management system. In addition, emergency conditions identified during these patrols are addressed while onsite. For conditions found on high-risk circuits, corrections will be completed on shorter timeframes as defined in Table 6.

TABLE 6: TRANSMISSION CORRECTION TIMEFRAMES

Condition Priority	Correction Timeframe	Correction Timeframe on High-Risk Circuits
Priority 1	Immediately	Immediately
Priority 2	Within 12 months or next outage	Targeted for completion within 30 days of discovery (pending access requirements and outage approval from MISO)
Priority 3	Secondary inspection required	Targeted for completion within 30 days of discovery (pending access requirements and outage approval from MISO)
Priority 4	Recorded for future repair	Recorded for future repair

4.2 VEGETATION MANAGEMENT

MidAmerican's vegetation management program utilizes a defense-in-depth approach to manage vegetation located in the utility's right-of-way (ROW) and minimize encroachments located adjacent to the ROW. This program has been designed to prevent the risk of vegetation-related contacts that could lead to customer service interruptions or damage to equipment. Vegetation conflicts are identified and cleared according to the specifications contained in the MidAmerican distribution and transmission program documents.

4.2.1 DISTRIBUTION

Overhead distribution circuits and the associated transmission facility segments that are “over-built” on distribution circuits are inspected and vegetation is cleared or trimmed according to program specifications. In South Dakota, distribution facilities designated as Urban and Suburban are trimmed based on a three-year growing cycle, not to exceed 48 months. Distribution facilities designated as Rural and Remote are trimmed based on a five-year growing cycle, not to exceed six years. In addition, mid-cycle inspections are performed for Rural and Remote facilities. The definitions of these circuit types are described in Table 7. Enhanced vegetation management practices will be implemented for all high-risk circuits regardless of location. These measures include annual inspections and corrective work activities to address vegetation conditions. Additional activities include pruning trees to maintain safe clearances from power lines, removing dead, damaged, or high-risk trees and limbs, and managing brush and other vegetation within utility corridors.



Example of Vegetation Management Work

TABLE 7: DISTRIBUTION CIRCUIT TYPE DEFINITIONS

Circuit Type	Definition
Urban	> 50 customers per mile of line
Suburban	25 – 50 customers per mile of line
Rural	5 – 25 customers per mile of line
Remote	< 5 customers per mile of line

MidAmerican classifies species of trees as High or Low Clearance based on the speed of growth. This classification determines the clearance distances achieved at the time of maintenance pruning on all distribution lines as shown in Table 8.

TABLE 8: DISTRIBUTION CLEARANCE DISTANCES

Circuit Type	Type of Trimming	Clearance Class	Clearance Distances	Expanded Clearance Distances on High-Risk Circuits
Urban/Suburban	Over/Under	High	14 feet	16 feet
		Low	7 feet	9 feet
	Side Trim	High	10 feet	12 feet
		Low	5 feet	7 feet
Rural/Remote	Over/Under	High	16 feet	18 feet
		Low	9 feet	11 feet
	Side Trim	High	12 feet	14 feet
		Low	7 feet	9 feet

4.2.2 TRANSMISSION

Transmission and high-voltage distribution facilities (34.5 kV and above) are inspected for vegetation at least annually. Vegetation conflicts are identified, prioritized and mitigated in accordance with MidAmerican transmission specifications. Additional inspections and vegetation clearance activities may be conducted in association with wildfire risks, construction projects, unusual weather events or service quality issues.

An in-depth ground line inspection and clearing is completed on all 345 kV transmission facilities based on a five-year growing cycle. During these cycles, identified areas are cleared of all tall growing (species which mature at 20' or greater) trees and vegetation within the ROW, as well as trimming and redirecting of any vegetation that overhangs into the easement area. Imminent threats from off-ROW vegetation will be trimmed or removed to eliminate the threat.

For high-risk circuits, enhanced vegetation management practices will be implemented. These measures include annual inspections and corrective work activities to address vegetation conditions. Additional activities include pruning trees to maintain safe clearances from power lines, removing dead, damaged, or high-risk trees and limbs, and managing brush and other vegetation within utility corridors. MidAmerican's transmission line maintenance clearance thresholds that require corrective action are provided in Table 9.

TABLE 9: TRANSMISSION CLEARANCE DISTANCES

Clearance Type	345 kV	161 kV	34.5 kV – 69 kV
Maintenance Distance	25 feet	20 feet	10 - 12 feet
Maintenance Distance on High-Risk Circuits	ROW Clearing	25 feet	15 feet

4.3 SYSTEM HARDENING

MidAmerican undertakes a range of system hardening activities across its distribution and transmission facilities to reduce wildfire risk, improve reliability and enhance system resilience during severe weather events. These activities focus on electrical equipment and facilities that could contribute to wildfire ignition or be susceptible to damage under extreme conditions.

With respect to wildfire risk, system hardening activities are implemented to reduce conditions that could result in the emission of sparks or equipment failure under abnormal conditions. These efforts represent a primary long-term wildfire risk mitigation approach available to electric utilities. Accordingly, work is prioritized using a risk-based framework that considers wildfire exposure, weather risk, system vulnerability and potential customer impact. In addition to wildfire mitigation, these actions strengthen the electric system and support improved reliability and service continuity.

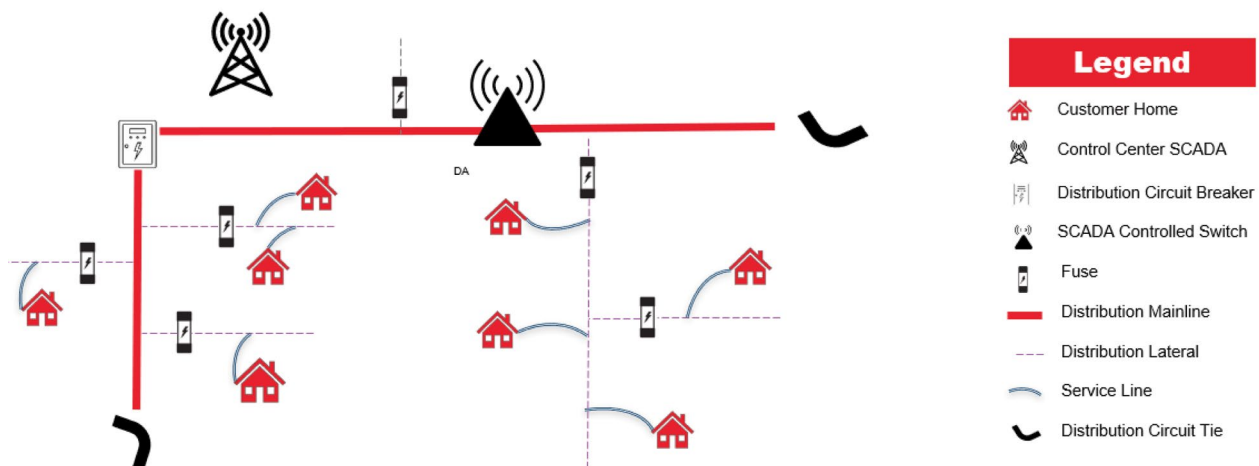
4.3.1 DISTRIBUTION

Distribution system hardening consists of industry-proven practices to reduce risks associated with wildfire and severe weather. The measures described below are applied to improve infrastructure resilience, limit the likelihood of ignition, and reduce outage duration and customer impact.

Distribution Mainline Hardening – The mainline of a distribution circuit functions as the backbone of the circuit and supplies the largest proportion of customers served by that circuit. Mainline hardening activities are intended to enable the circuit backbone to better withstand wildfire exposure and extreme weather conditions. A simplified depiction of a distribution circuit, including the mainline, is shown in Figure 5.

FIGURE 5: SIMPLIFIED DISTRIBUTION CIRCUIT ILLUSTRATION

Distribution



Pole Replacement – Pole replacement activities address higher-risk poles identified through routine inspection cycles or during normal operations. Replacing deteriorated or high-risk poles reduces the likelihood of mechanical failure, conductor contact and service disruption during severe weather or wildfire events.

4.3.2 TRANSMISSION

MidAmerican's transmission system hardening programs are comprised of industry-proven methods for reducing risk associated with severe weather and wildfire. These programs, which are detailed below, are intended to improve resilience and mitigate wildfire risk.

Wood Pole Replacement Program – MidAmerican replaces wooden transmission poles that have been identified as higher-risk during annual inspections or during the normal course of business. Replacing these poles reduces the risk of wildfire and negative impacts caused by extreme weather.

Non-Wood Pole Installation Program – Non-wood poles are more resilient to weather and wildfire and a subset of the wood poles targeted for replacement will be converted to non-wood materials (steel, ductile iron or fiberglass). Non-wood pole alternatives are evaluated on a case-by-case basis according to the cost benefits associated with their installation and, when possible, these are installed along high-risk circuits.



Example of pole replacement



Example of Interstate Containment/Non-Wood Pole Installations

4.4 FIELD AND SYSTEM OPERATIONS

4.4.1 MODIFIED FIELD PRACTICES

MidAmerican closely monitors weather conditions conducive to igniting and spreading fires to determine when to modify the field practices for employees and contractors. This includes field employees, construction and inspection contractors, and vegetation management contractors.

The tools MidAmerican uses to continually monitor fire weather conditions include a combination of internal weather dashboards and publicly available weather data from the National Weather Service (NWS). The main condition threshold considered for modifying field practices is Red Flag Warnings. These warnings can indicate how quickly fires can spread once ignited; however, this metric does not consider available fuels in the area or the intensity at which those fuels would burn (Jakober, Brown and Wall, 2023). Because of this limitation, MidAmerican may also consider the Severe Fire Danger Index (SFDI) in its determination. SFDI is a composite, percentile-normalized fire danger metric that combines Energy Release Component (ERC) and Burning Index (BI) percentiles to represent the co-occurrence of dry fuels and wind-driven spread/flame-length potential. This makes SFDI useful for comparing fire danger across different climatological regions, elevations and fuel types because each location is evaluated relative to its own historical distribution rather than by raw ERC or BI values (Jolly, 2019).

Anytime these conditions are announced or forecasted, personnel within respective areas are required to implement multiple modifications in field operations to reduce the risk of ignition points and expedite the response to reports of arcing, sparking or fire. Some examples of this are that all non-emergency work on energized transmission and distribution primary facilities is deferred if there are adjacent fuel sources within the area of work. Personnel are instructed to avoid driving near tall grasses, fire risks are incorporated into job safety analysis (JSA) discussions and forms, reports of fires and downed lines are prioritized, manual reclose attempts are not performed, trip/close events are patrolled to confirm no hazards remain, and additional monitoring protocols are instituted. Company vehicles are also equipped with fire suppression equipment, and personnel are trained in proper use.

4.4.2 SYSTEM OPERATIONS

While some initiatives and technologies listed in this section assist with reliability and resilience, nearly all the system operations projects detailed below have the primary impact of mitigating wildfire ignitions.

Enhanced System Settings (ESS) for protective devices are used to reduce the risk of ignitions during fault events on the distribution and transmission system through turning off the auto-reclosing function on protective devices along high-risk distribution and transmission circuits during periods of prolonged warm, dry

and windy conditions. These weather conditions historically occur in spring and fall, and during Red Flag Warnings. This action also puts many of these devices into a fast trip mode. If a fault occurs when these settings are implemented, the power will go out without an automatic attempt to re-energize, effectively reducing sparks and potential ignition sources. In these situations, a line patrol will be required to locate the fault before the device is reclosed. While this may increase the likelihood of sustained outages for customers in affected areas, it will only take place during periods of elevated fire risk and is a reasonable measure to reduce ignition potential. There are currently no high-risk distribution circuits in South Dakota. There is one high-risk transmission line in South Dakota where MidAmerican applies ESS during elevated fire risk periods. However, due to the network configuration of the transmission system in this area, the ESS settings would not have impacts on South Dakota customers. If this changes based on future wildfire risk assessments, MidAmerican would notify the South Dakota Public Utilities Commission through a WMP amendment or a new plan filing.

TripSaver Installation – Cutout-mounted reclosers (TripSavers) are being installed on an ongoing basis to replace existing fuses on MidAmerican's distribution system. TripSavers do not spark like an expulsion fuse, and if there is a fault, the TripSaver will trip off and reclose automatically. This allows temporary fault conditions, such as lightning or a tree branch strike, to be interrupted and then automatically re-energized after the fault is cleared. This assists in the prevention of sustained customer outages, and the reduction in sparks emitted decreases ignition risks. As noted above, the reclosing function of these devices is disabled on high-risk circuits during elevated risk periods. While some TripSavers are implemented through long-term planning efforts, others are installed responsively to address ongoing reliability concerns.



System control – where remote de-energizations occur



Example of TripSaver

4.4.3 ENCROACHMENT DE-ENERGIZATIONS

MidAmerican has implemented an encroachment de-energization policy for electric facilities. This policy defines when to de-energize facilities that are in danger of being impacted by nearby wildfires. When MidAmerican is notified of a fire in its territory, crews are dispatched to investigate and, if necessary, de-energize facilities to prevent the risk of secondary ignition resulting from damaged facilities. To further enhance public safety, this policy now sets an expectation that electric de-energization efforts will be performed remotely by MidAmerican's system operators when the facility is at risk from a credible wildfire that is considered uncontrolled and unpredictable, and the location can be confidently identified and isolated. In all situations, MidAmerican will continue to dispatch crews to reported fires even when facilities are remotely de-energized.

The ability to de-energize remotely reduces risk to emergency personnel who are working to suppress the fire, as well as eliminates secondary ignitions from occurring. Remote de-energization can create an outage for customers that may not be directly impacted by a fire if MidAmerican is unable to provide power from an alternative source. In those situations, an unplanned outage is created in MidAmerican's outage management system, and customers are notified through existing outage alerts using email and text, depending on subscription preferences, throughout the duration of the event. Anytime an encroachment de-energization is completed, MidAmerican will wait for an all-clear from emergency response personnel before patrols and re-energization efforts can begin. Once that all-clear is received, areas of the facility exposed to the fire will be patrolled to confirm there are no additional faults or concerns, and it can safely be re-energized. Once confirmed by field personnel, the facility is re-energized.



Encroachment fire example near a substation

4.4.4 PUBLIC SAFETY POWER SHUT-OFFS (PSPS)

A public safety power shut-off (PSPS) is the proactive de-energization of electric facilities during extreme fire weather events to reduce the risk of creating an ignition and to enhance public safety. Historically, MidAmerican has completed PSPS events proactively on both gas and electric services when there is imminent risk of flooding in those communities. This practice has now been expanded to include high-risk distribution circuits to reduce the potential of becoming an ignition source during extreme fire weather conditions. The decision to implement a PSPS event is based on several factors, and each weather event is unique. PSPS will be considered as a last resort to protect the public, as MidAmerican understands how essential electric service is for critical facilities and to reduce impacts on vulnerable populations. Because there are currently no high-risk distribution circuits in South Dakota, a PSPS would not be implemented in this state by MidAmerican. If this changes based on future risk assessments, MidAmerican would notify the South Dakota Public Utilities Commission through a WMP amendment or a new plan filing.

PSPS Criteria and Thresholds – Several criteria are continually monitored to determine whether a PSPS event should occur, and these are all related to weather and fuel data. While MidAmerican does not publish its specific criteria or established thresholds, standard conditions that are conducive to starting and spreading fires (low humidity, high wind gusts, high sustained wind speeds and low fuel moisture) are monitored in addition to how likely it is for an ignition to occur on a circuit, how quickly a fire could spread, how intensely a fire would burn if it did ignite, if there are abundant fuels to sustain a wildfire and how high the consequence of a wildfire would be (Science Insights: What Fire Weather Means).

PSPS Risk Level – MidAmerican continuously monitors these criteria, as well as other conditions for enhanced risk of wildfire. When extreme levels of these conditions combine, they increase the likelihood of a utility ignition and are conducive to starting and spreading wildfires. MidAmerican analyzes the criteria to determine the level of wildfire risk based on the number and severity of PSPS criteria forecasted to be met. The PSPS risk levels are outlined in Table 10. As detailed in this table, the actions taken based on each risk level will increase as the risk escalates.

TABLE 10: PSPS RISK LEVEL AND ASSOCIATED ACTIONS

PSPS Risk Levels	Actions Taken
Low	Information included in daily System Operations email for situational awareness No actions taken at this level
Moderate	Information included in daily System Operations email for situational awareness Field practices may be modified based on a Red Flag Warning or a fire danger index level Corporate Communications is notified Future forecast analyzed
High	Information included in daily System Operations email for situational awareness Field practices may be modified based on a Red Flag Warning or a fire danger index level Corporate Communications is notified Future forecast analyzed Senior leadership is notified Daily situational awareness calls with key internal stakeholders will be held
Very High	Information included in daily System Operations email for situational awareness Field practices may be modified based on a Red Flag Warning or a fire danger index level Corporate Communications is notified Future forecast analyzed Senior leadership is notified Mandatory Incident Command call established with key internal stakeholders will be held Field observations in areas of concern are completed PSPS communications plan is initiated Update provided to executive leadership on possibility of initiating a PSPS event
Extreme	Information included in daily System Operations email for situational awareness Field practices may be modified based on a Red Flag Warning or a fire danger index level Corporate Communications is notified Future forecast analyzed Senior leadership is notified Mandatory Incident Command call established with key internal stakeholders will be held Field observations in areas of concern are completed PSPS communications plan is initiated Recommendation to executive leadership to initiate a PSPS event

When conditions are forecasted and a PSPS event may be required to mitigate the risk of wildfire on high-risk circuits, a series of communications to all internal and external stakeholders, public safety partners and impacted customers will be made. Weather conditions are dynamic and may change frequently and with little notice. MidAmerican will undertake reasonable efforts to provide advanced notification to the public and key stakeholders of these events and keep all parties informed throughout the duration of the event. The notifications outlined in Figure 6 will be used before, during and after a PSPS event.

FIGURE 6: PSPS NOTIFICATION SUMMARY

48-72 Hours Ahead	24 - 48 Hours Ahead	Within 24 Hours of PSPS	Day of PSPS	End of PSPS
PSPS WATCH (PSPS CONDITIONS FORECASTED) Notify public safety partners, regulators and operators of critical facilities Notify customers Post to website and social media Issue press release Mandatory incident command call	PSPS WARNING (POTENTIAL FOR PSPS EVENT) Notify public safety partners, regulators and operators of critical facilities Notify customers Post to website and social media Issue press release Mandatory incident command call	PSPS EVENT (PSPS WILL OCCUR) Notify public safety partners, regulators and operators of critical facilities Notify customers Post to website and social media Issue press release Mandatory incident command call	PSPS EXECUTION (PSPS HAS BEGUN) Notify public safety partners, regulators and operators of critical facilities Notify customers Post to website and social media Issue press release Mandatory incident command call	PSPS CONCLUSION (PSPS HAS ENDED) Notify public safety partners, regulators and operators of critical facilities Notify customers Post to website and social media Issue press release Mandatory incident command call

- ▶ **PSPS Watch** – This notification explains several PSPS conditions are forecasted and if conditions continue or worsen, a PSPS event may occur. MidAmerican will analyze current and forecasted conditions for the likelihood of a PSPS being necessary.
- ▶ **PSPS Warning** – This notification provides warning that a PSPS is likely to occur. If this communication is warranted, employees will be assigned field observation to communicate real-time conditions in areas of concern as well.
- ▶ **PSPS Event** – This notification alerts all those impacted that a PSPS event will occur.
- ▶ **PSPS Execution** – This notification advises all those impacted that the PSPS event has started and service is de-energized.
- ▶ **PSPS Conclusion** – This notification informs that the PSPS event has concluded and service to impacted customers has been re-energized.

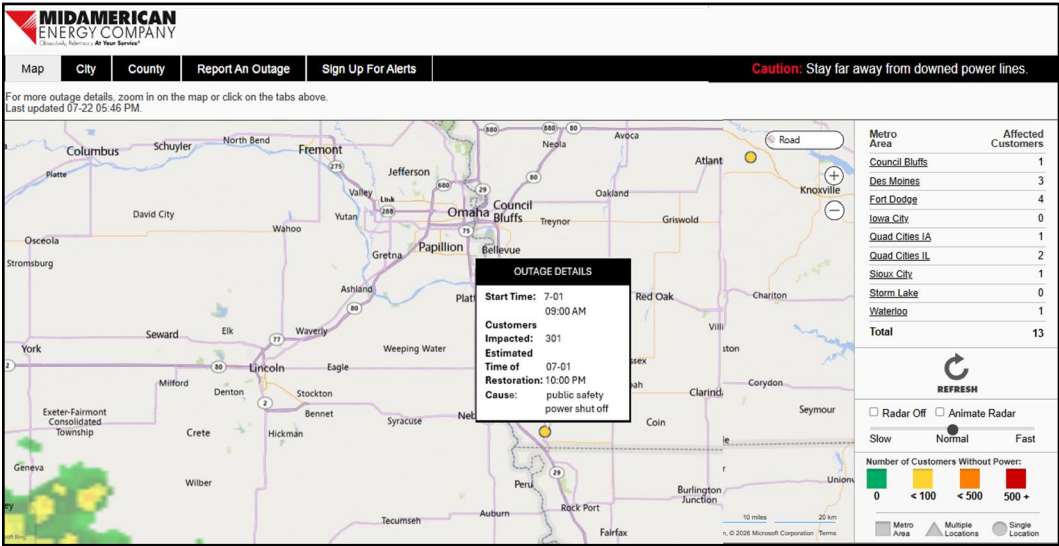
Incident Command – As soon as the PSPS risk level reaches a very high status, a mandatory incident command call will be established to prepare for a potential PSPS event by reviewing and discussing the following:

- ▶ Current weather conditions
- ▶ Forecasted weather conditions
- ▶ Trends being seen in weather conditions
- ▶ Necessary communications based on conditions and risk level
- ▶ Areas of potential de-energization
- ▶ Number of customers impacted by potential de-energization
- ▶ Effort and resources required for potential de-energization
- ▶ Timing of potential de-energization

De-energizing Electric Facilities – Upon determining that a PSPS event is warranted in accordance with the established criteria set forth in its PSPS policy, MidAmerican will de-energize the identified high-risk distribution circuits. To the extent practical, de-energization activities will be executed remotely by system operators utilizing the Company’s Supervisory Control and Data Acquisition (SCADA) system. For facilities not equipped with SCADA functionality, authorized field personnel will perform de-energization.

Following de-energization, MidAmerican will continue to monitor system and environmental conditions and will provide ongoing communications to customers, public safety partners and other stakeholders. The Company’s outage map will serve as the primary source of public information during a PSPS event. Incident-specific information related to the de-energization and restoration process may be communicated through the outage map, as illustrated in Figure 7.

FIGURE 7: OUTAGE MAP INCIDENT FOR PSPS EVENT



Restoration – When PSPS conditions subside or the critical weather conditions are no longer at an extreme risk level and it is safe to re-energize the system, MidAmerican will work to restore services as quickly and safely as possible. This may occur in stages based on the extent and number of circuits impacted and will occur after a visual patrol of the circuits to be energized. Once re-energization activities are completed and services are restored, notification will be provided to all stakeholders, public safety partners and impacted customers, and operations will return to normal.

Post PSPS Event – Following a PSPS event, MidAmerican will conduct a meeting to review the event, discuss lessons learned and identify potential modifications to its PSPS protocols. These meetings will focus on operational processes, communications, customer support, as well as emergency response and restoration. MidAmerican may also request feedback from external stakeholders and public safety partners on coordination efforts, communications and outreach effectiveness.

Exercises – MidAmerican will exercise its PSPS plan and process on an annual basis using various scenarios and testing all or any portion(s) of the plan which may include the following:

- ▶ Escalation process should the weather conditions worsen
- ▶ Communication timing as risk level escalates
- ▶ Discussing and developing de-energization plans
- ▶ Operational plans such as reporting field observations or positioning employees at manually operated disconnects to evaluate timing for de-energization
- ▶ Discussing and/or practicing roles and responsibilities of both strategic and operations, including decision-making handoffs and hypothetical scenarios
- ▶ Discussing and/or developing re-energization plans

4.4.5 RE-ENERGIZATION FOLLOWING WILDFIRE EVENTS

MidAmerican follows industry best practices for re-energizing power lines after a wildfire event. These practices are focused on public safety, system integrity and risk reduction. Following any wildfire, MidAmerican field and operations personnel complete patrols along impacted circuits prior to re-energization occurring. These patrols can include ground-level and aerial inspections, when necessary, using drone technology. Inspections such as these help to identify damaged conductors, compromised poles, insulators and hardware, as well as fire-weakened vegetation or hazard trees that could create new faults. Circuits are only re-energized once identified hazards are mitigated, clearances are verified and necessary repairs are completed. In these situations, MidAmerican would be in close coordination with fire response agencies and emergency management personnel to ensure areas are safe for crew access and complete restoration activities. Incremental or sectional re-energization, supported by switching plans and enhanced monitoring (e.g., SCADA, line sensors, etc.), helps detect abnormal conditions early and reduces the risk of re-ignition. Finally, all restoration actions are documented and reviewed after the event to inform future mitigation strategies and improve system resilience.

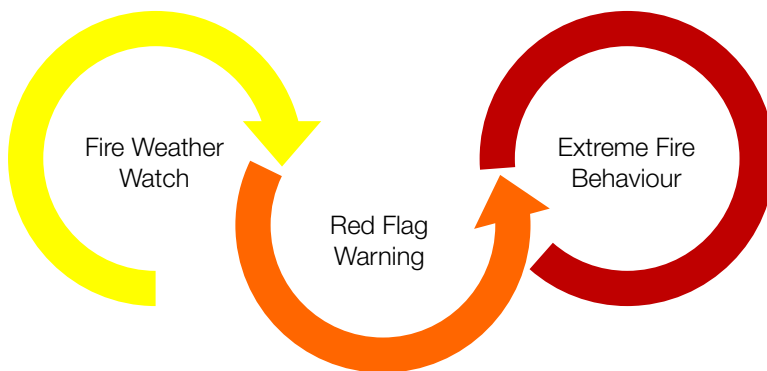
5.0 SITUATIONAL AWARENESS

Situational awareness is the foundation of an effective wildfire mitigation plan. By continuously monitoring fire weather conditions, assessing wildfire risk and understanding system vulnerabilities, situational awareness enables MidAmerican to anticipate elevated fire risk and take timely, informed action. This proactive understanding of when and where wildfire conditions exist supports risk-based decision making, helps prioritize mitigation measures and allows operational practices to be adjusted before incidents occur.

5.1 MONITORING FIRE WEATHER CONDITIONS

MidAmerican personnel use a combination of publicly available weather data, weather data from the company's own weather stations and an internal fire weather dashboard to evaluate wildfire risk. The 3-Day Look Ahead from the National Oceanic and Atmospheric Administration's (NOAA) National Weather Service (NWS) is monitored to identify fire weather conditions. This information is also gathered from the NWS through Fire Weather Watches, Red Flag Warnings and Extreme Fire Behavior. These alerts are escalatory in nature from watch to warning to behavior as shown on Figure 8.

FIGURE 8: NWS FIRE ALERT ESCALATION



5.1.1 WATCHES AND WARNINGS FROM NWS

Fire Weather Watches are an indicator to be prepared. An alert is provided to land management agencies and the public about the possible onset of critical weather and fuel conditions that could lead to increases in wildfire activity. Red Flag Warnings are a warning to act and be extremely careful with any open flames. These are issued when the critical weather conditions are expected to occur shortly, are ongoing or are imminent. Extreme Fire Behavior is an alert that an ongoing wildfire is likely to get out of control. One of the following conditions must be present for this alert to be issued: fire is moving fast or has a high rate of spread, prolific crowning

and/or spotting, presence of fire whirls, or strong convection column (Understanding Wildfire Warnings, Watches and Behavior, n.d.). Any time any of these alerts are issued, MidAmerican staff are notified through email and text notifications.

Each year, the NWS coordinates with each state to implement an annual operating plan related to fire weather services. Red Flag criteria are established in these plans and vary from state to state (Treisman, 2023). Once a Red Flag Warning is issued, MidAmerican initiates communications with employees, including those in the field, to raise awareness and modify field practices as outlined in the prior section.

5.1.2 FIRE WEATHER DASHBOARD

MidAmerican collaborated with the same vendor that completed its circuit-level wildfire risk assessment to develop the internal fire weather dashboard that provides a 7-day forecast for conditions associated with fire risk. This dashboard provides data for severe fire danger index (SFDI), wind gusts and a composite risk index (CRI) by operating division level. SFDI is an indicator of daily fire conditions, and it is calculated based on how dry fuels are and how fast a fire could spread on that day. If the SFDI conditions are elevated, this provides advance warning to field personnel of upcoming days to modify field practices, and it also provides MidAmerican advance warning for implementing enhanced system settings. The CRI provided on this dashboard is similar to SFDI; however, it also accounts for the specific risk of utility ignitions and is heavily weighted on wind gust speeds. The CRI is an additional datapoint used by MidAmerican to assess the need to initiate a PSPS event. Because high wind gusts are a main contributing factor to causing downed power lines, which can result in ignitions, the dashboard also provides an outlook on this condition. This dashboard has alerting capabilities based on established thresholds set by the company, and personnel can be notified when elevated conditions are forecasted. An example of the daily maximum of the metrics this dashboard is tracking is shown in Figure 9. MidAmerican will continue to refine this dashboard as the Company's wildfire mitigation program matures.

FIGURE 9: FIRE WEATHER DASHBOARD

MidAmerican Fire Weather Dashboard
Last update: 2026-05-11 14:45. Next update: 2026-05-11 20:45.

Daily Maximum CRI by Division

Division	May 11	May 12	May 13	May 14	May 15	May 16	May 17
Council Bluffs	4	4	1	5	2	3	4
Des Moines East	0	0	0	0	0	0	0
Des Moines West	0	1	1	1	0	0	1
Fort Dodge	2	5	3	5	3	2	1
Iowa City	1	1	1	0	0	0	0
Quad Cities Illinois	0	1	1	0	0	0	0
Quad Cities Iowa	0	1	1	0	0	0	0
Sioux City	10	22	3	21	12	12	14
Storm Lake	8	12	2	11	7	7	2
Waterloo	4	6	4	2	1	2	1

Daily Maximum Wind Gust by Division

Division	May 11	May 12	May 13	May 14	May 15	May 16	May 17
Council Bluffs	36	45	25	37	35	35	38
Des Moines East	32	44	34	32	34	25	37
Des Moines West	32	48	28	33	33	31	39
Fort Dodge	35	47	29	31	36	31	36
Iowa City	23	37	33	27	31	23	32
Quad Cities Illinois	24	41	33	27	36	22	33
Quad Cities Iowa	24	38	33	24	35	23	31
Sioux City	37	50	22	37	42	34	34
Storm Lake	34	46	19	35	36	31	33
Waterloo	31	41	35	30	34	26	35

Daily Maximum SFDI by Division

Division	May 11	May 12	May 13	May 14	May 15	May 16	May 17
Council Bluffs	high	high	moderate	high	high	high	very high
Des Moines East	moderate	high	moderate	moderate	moderate	moderate	moderate
Des Moines West	moderate	high	high	high	high	moderate	high
Fort Dodge	high	high	high	high	high	high	high
Iowa City	low	moderate	moderate	low	moderate	low	moderate
Quad Cities Illinois	low	moderate	moderate	low	moderate	moderate	moderate
Quad Cities Iowa	low	moderate	moderate	low	moderate	moderate	moderate
Sioux City	very high	very high	moderate	high	very high	very high	very high
Storm Lake	high	high	high	high	high	high	high
Waterloo	moderate	high	high	high	high	moderate	high

5.1.3 WEATHER STATION INSTALLATIONS

To enhance situational awareness and support data-driven wildfire risk mitigation, MidAmerican deploys Remote Automatic Weather Stations (RAWS) in proximity to identified high-risk distribution circuits. These stations provide localized, real-time meteorological and fuel-condition data, including wind speed, relative humidity and fuel moisture measurements. The information collected is integrated into operational monitoring and risk assessment processes to improve awareness of evolving fire weather conditions and support informed operational decision-making during periods of elevated wildfire risk. MidAmerican's placement of RAWS is guided by a risk-based approach that prioritizes areas where weather observations can provide

the greatest operational value in supporting wildfire mitigation activities.

While South Dakota contains only a small portion of MidAmerican's overhead distribution system and does not currently include distribution circuits identified as high-risk under the Company's wildfire risk assessment methodology, the Company recognizes the value of broad geographic weather-monitoring coverage across the communities it serves. While publicly available weather-monitoring networks provide observational coverage across MidAmerican's South Dakota service area (Western Regional Climate Center, RAWS USA Climate Archive), to further enhance situational awareness and ensure adequate localized weather monitoring across all communities served by the Company, MidAmerican plans to deploy a RAWS in South Dakota. Data collected from this station will supplement existing weather information sources and support ongoing operational monitoring, risk assessment and wildfire mitigation activities. MidAmerican will continue to evaluate weather-monitoring needs and may adjust station deployment as system conditions, operational requirements, wildfire risk assessments and service area coverage needs evolve.



Example of weather station being installed

5.2 CONTROLLED BURNS

Understanding controlled burn activity is critical for MidAmerican to effectively manage wildfire risk, protect its gas and electric systems, and reduce the likelihood that these facilities could create a secondary ignition source. Controlled burns can temporarily elevate fire risk near distribution and transmission infrastructure as well as gas regulator stations and farm taps, particularly when smoke, embers or wind-driven fire behavior encroach on rights-of-way. Having advanced awareness of burn locations, timing and objectives allows MidAmerican time to coordinate and develop proactive de-energization, de-pressurization or shutdown plans if the fire happens to breach the planned burn perimeter and encroaches on gas or electric facilities. MidAmerican completes outreach with the Department of Natural Resources, County Conservation Boards, Farm Services Agencies and professional and volunteer fire agencies to share why proactive notification to the utility is critical, as it allows time to create de-energization and/or shut-off plans should fires become uncontrolled. Informational sheets on this policy are distributed to area farmers doing controlled burns as part of the Conservation Reserve Program or anyone who inquires about doing a controlled burn.



6.0 COMMUNICATIONS AND ENGAGEMENT

MidAmerican has found that proactive and ongoing communications help communities prepare more effectively for severe weather events, and this includes wildfires. As part of the plan, MidAmerican is continuing to develop internal and external digital communications campaigns to increase awareness of employees, customers and the public specific to the emerging risk of wildfires, how to prepare for them and what MidAmerican is doing to prevent, mitigate and respond to wildfires. These campaigns and other outreach efforts MidAmerican completes or plans to complete include the following:

- ▶ Social media
- ▶ Website content
- ▶ Outbound calls when there is a PSPS event
- ▶ Emails when there is a PSPS event
- ▶ Outreach to key customers
- ▶ News releases
- ▶ Routine articles and training with employees
- ▶ Information sharing with regulators
- ▶ Meetings with public safety partners and community leaders in areas with high-risk circuits
- ▶ Direct mailings to customers served by high-risk circuits

MidAmerican holds meetings with community leaders and emergency management personnel in areas where high-risk circuits are located to share wildfire mitigation strategies and make them aware of how these efforts can impact customers in these communities. Additionally, presentations are provided during county fire chief meetings as requested anywhere within MidAmerican's service territory, with the initial focus being on counties where high-risk circuits are located.

During development of the plan, MidAmerican relied on insights from utilities with more mature wildfire mitigation programs and processes. Several plans were reviewed, and meetings were held to discuss lessons learned from utility companies in western and southern portions of the country to better understand how wildfire mitigation programs have advanced over the past decade and best practices currently in place. MidAmerican also collaborates with other Midwest utilities to better understand how these companies are approaching wildfire risks and assess the progression of their mitigation efforts and plan development. In addition, MidAmerican compiled information from several professional organizations

such as the Edison Electric Institute, the North American Transmission Forum, the National Oceanic and Atmospheric Administration, and the International Wildfire Risk Mitigation Consortium. This feedback was valuable in understanding effective and industry-proven wildfire mitigation strategies, such as system operational measures and enhanced situational awareness.

To gain additional insight into wildfire risks and best practices in emergency response, MidAmerican engaged with the National Weather Service, the National Geographic Area Coordination Center, fire agencies and emergency management professionals throughout its territory. These stakeholders provided valuable feedback and insights that were incorporated into the plan.

7.0 FORECASTED WILDFIRE EXPENSE

Currently, all expenses related to wildfire mitigation are absorbed through existing capital and operational budgets. Most of the action items included in this plan have benefits beyond mitigating wildfire risk such as reliability and system resilience. Consequently, MidAmerican is only capturing wildfire expenses that occur on high-risk circuits or that have the primary benefit of mitigating wildfire risk.

The 2026 through 2028 forecasted expenses related to wildfire mitigation specific to South Dakota are detailed in Table 11. The costs in this state are low because South Dakota's risk exposure is limited in the areas MidAmerican serves. Costs may change if future risk assessments identify additional high-risk circuits within the state. All expenses are being tracked for future reporting and cost recovery decisions.

TABLE 11: WILDFIRE EXPENSES IN SOUTH DAKOTA

Mitigation Area for South Dakota	2026 Forecasted Wildfire Expense	2027 Forecasted Wildfire Expense	2028 Forecasted Wildfire Expense
Inspection & Correction	\$102	\$102	\$102
Vegetation Management	\$4,000	\$4,000	\$4,000
System Hardening	\$0	\$0	\$0
Field & System Operations	\$0	\$0	\$0
Situational Awareness	\$0	\$20,000	\$750



8.0 GOVERNANCE AND CONTINUOUS IMPROVEMENT

MidAmerican's WMP is governed through a structured oversight process designed to support accountability, transparency and continuous improvement. Responsibility for implementation and oversight of the WMP is shared across relevant business functions, with periodic review by Company leadership to assess program performance, emerging risks and mitigation priorities. The governance framework includes evaluation of wildfire risk assessments, mitigation initiatives, operational readiness, and lessons learned from internal operations and industry events. Findings from these reviews may be used to refine mitigation strategies, prioritize investments and enhance program effectiveness. This ongoing governance process helps ensure the WMP remains responsive to changing environmental conditions, evolving operational risks, technological advancements and applicable regulatory expectations.

MidAmerican recognizes that wildfire risk management is an evolving discipline that requires continuous assessment and adaptation. Accordingly, its wildfire mitigation strategies outlined within this plan will continue to mature through ongoing evaluation of emerging technologies, operational practices, environmental conditions and industry best practices. MidAmerican will periodically refine its risk assessment methodologies, expand situational awareness capabilities, enhance system hardening and vegetation management programs, and evaluate additional mitigation measures designed to reduce wildfire ignition risk. MidAmerican will also continue to incorporate lessons learned from internal experience, industry research, regulatory developments and stakeholder engagement to ensure its wildfire mitigation strategies remain effective, data-driven and aligned with its commitment to public safety, system reliability and environmental stewardship.



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- Western Regional Climate Center, RAWS USA Climate Archive RAWS USA Climate Archive State Selection Map: <https://raws.dri.edu/>

APPENDIX A – STATUTORY REQUIREMENT SUMMARY

Statute	Description	Location Within Wildfire Mitigation Plan
SDCL § 49-49-4(1)	A description of areas within the service territory or facility locations of the qualified utility, which may be subject to a heightened risk of wildfire	Section 2.0 - Wildfire Risk Assessment Specifically Figure 3 – Overhead Circuits in South Dakota Specifically Figure 4 - High-Risk Transmission Line S73 in South Dakota
SDCL § 49-49-4(2)	A description of the procedures or strategies, standards and timeframes that the qualified utility will use to inspect and operate its infrastructure	Sub-section 4.1 - Inspection and Correction Specifically Table 3 - Distribution Inspection Program Overview Specifically Table 4 - Distribution Correction Timeframes Specifically Table 5 - Transmission Inspection Program Overview Specifically Table 6 - Transmission Correction Timeframes
SDCL § 49-49-4(3)	A description of the procedures or strategies, and standards that the qualified utility will use to perform vegetation management	Subsection 4.2 - Vegetation Management Specifically Table 7 - Distribution Circuit Type Definitions Specifically Table 8 - Distribution Clearance Distances Specifically Table 9 - Transmission Clearance Distances
SDCL § 49-49-4(4)	A description of the procedures or strategies for modifications or upgrades to electric facilities and preventative programs to reduce the risk of its electric facilities initiating a wildfire	Subsection 4.3 - System Hardening
SDCL § 49-49-4(5)	A description of considerations or strategies for de-energizing power lines or modifying electric facility operations to mitigate potential wildfires	Subsection 4.4 - Field and System Operations Specifically Subsubsection 4.4.1 – Modified Field Practices Specifically Subsubsection 4.4.2 - System Operations Specifically Subsubsection 4.4.3 - Encroachment De-energizations Specifically Subsubsection 4.4.4 - Public Safety Power Shut-Offs (PSPS)

APPENDIX A – STATUTORY REQUIREMENT SUMMARY

Statute	Description	Location Within Wildfire Mitigation Plan
SDCL § 49-49-4(5)(a)	The ability of the qualified utility to reasonably access the proposed powerline to be de-energized	Section 1.0 - Executive Summary
SDCL § 49-49-4(5)(b)	The balance of the risk of wildfire with the need for continued supply of electricity to a community	Subsubsection 4.4.4 - Public Safety Power Shut-Offs (PSPS) Section 5.0 - Situational Awareness
SDCL § 49-49-4(5)(c)	Any potential impact to public safety and first responders, as applicable	Subsubsection 4.4.4 - Public Safety Power Shut-Offs (PSPS)
SDCL § 49-49-4(6)	A description of the procedures or strategies the qualified utility intends to use to restore its electrical system in the event of a wildfire	Subsubsection 4.4.5 Re-energization Following Wildfire Events
SDCL § 49-49-4(7)	A description of the estimated incremental costs, if any, for the implementation of the plan, including system improvements and upgrades	Section 7.0 - Forecasted Wildfire Expense Specifically Table 11 - Wildfire Expenses in South Dakota
SDCL § 49-49-4(8)	A description of community outreach and public awareness efforts before and during a wildfire season	Section 6.0 Communications and Engagement
SDCL § 49-49-4(9)	A description of coordination with applicable state or local wildfire agencies	Section 6.0 Communications and Engagement