

Clearwater Wind III, LLC's Fire Mitigation Plan

Clearwater Mitigation Plan Background and Objectives:

Clearwater Wind III, LLC (Clearwater) is an “Electric facilities provider” as such term is defined in 2025 Montana House Bill No. 490, Montana Sixty-Ninth Legislature - 2025 Session (codified at Mont. Code Ann. § 69-2-XX1(6)), and thus is required to prepare and, once approved, implement this wildfire mitigation plan in accordance with Mont. Code Ann. § 69-2-XX2(1).

In accordance with the statute, this plan includes descriptions of:

- A. areas in which Clearwater has electric facilities or electric transmission and distribution activities that may be subject to a heightened risk of wildfire;
- B. the strategies and programs that Clearwater will use to inspect, maintain, repair, and operate its electric facilities;
- C. the strategies and programs that Clearwater will use to perform vegetation management;
- D. the strategies for modifications or upgrades to electric facilities and preventative programs that Clearwater will employ to reduce the risk of its electric facilities igniting a wildfire;
- E. the strategies and methods for de-energizing power lines and modifying electric facility operations to mitigate potential wildfires taking into consideration the ability of Clearwater to reasonably access the proposed electric facility to be de-energized, the balance of the risk of wildfire with the need for continued supply of electricity to a community, and any potential impact to public safety, first responders, and health and communications infrastructure;
- F. the methods Clearwater intends to use to restore its electrical system in the event systems are de-energized for the prevention of a wildfire;
- G. the estimated incremental costs associated with implementing the plan, including system improvements and upgrades for a regulated utility;
- H. community outreach and public awareness efforts before and during a wildfire season; and
- I. potential participation, if applicable, with state or local wildland fire protection plans or wildfire mitigation plans.

This plan’s primary objective is to prevent fire ignition resulting from operation, maintenance and/or construction of Clearwater’s generation or transmission facilities or, if ignition occurs, minimize any risk to public safety or private property.

Definitions:

- **Approval authority** – The commission for a regulated utility, the board of trustees for an electric cooperative, the city council or city commission for a municipal utility, or the appropriate body responsible for corporate governance of any other type of electric facilities provider.
- **Commission** – As defined in 69-1-101.
- **Department** – The department of natural resources and conservation, as provided in 2-15-3301.
- **Electric cooperative** – A cooperative organized under Title 35, chapter 18, or a similar state law for providing electricity to the public in Montana.
- **Electric facilities** – Equipment used for the transmission or distribution of electricity to the public, including generation and energy storage resources, substations, switchyards, poles, towers, transformers, conductors, and relaying, sectionalizing, and protective equipment such as arrestors.

- **Electric facilities provider** – Any operator, regulated utility, electric cooperative, municipally owned utility, entity owning electric facilities in the state without regard to commission jurisdiction, or transmitting utility under FERC jurisdiction that engages in electric transmission and distribution activities.
- **Electric transmission and distribution activities** – Any condition, activity, or facility directly related to the conveyance and distribution of electrical energy to a person, facility, transmission, or distribution system in the state.
- **Jointly owned electric facility** – An identified set of electric facilities jointly owned by multiple parties and operated by a designated operator.
- **Operator** – The person or entity designated by owners of a jointly owned electric facility as responsible for operation and maintenance.
- **Regulated utility** – A public electric utility regulated by the commission under Title 69, chapter 3.
- **Wildfire** – A forest or range fire as defined in 50-63-104, including fires ignited by electric facilities or activities associated with electric transmission and distribution activities, regardless of whether ignition occurs within an incorporated municipality.
- **Wildfire mitigation plan** – An electric facilities provider's written plan that identifies wildfire risks and strategies to mitigate or reduce those risks.

Wildfire Mitigation Plan Development:

Clearwater recognizes wildfire mitigation is multi-faceted and reliant on enhanced inspection, system hardening, vegetation management, situational awareness, outreach and response. Clearwater segmented its wildfire mitigation planning process into three phases:

Phase I (May-December 2025) – Document current practices. This plan will be presented to the clearwater approval authorities before year end of 2025

Phase II (January-June 2026) – Conduct system-wide wildfire risk assessment.

Phase III (July-December 2026) – Implement revised mitigation measures to address risks identified in Phase II.

Areas in which Clearwater has electric facilities or electric transmission or activities that may be subject to a heightened risk of wildfire:

Clearwater maintains 36 structures in Montana. The property was analyzed to determine which areas in which clearwater has electric facilities of electric transmission and distribution activities that may be subject to a heightened risk of wildfire. The analysis identifies areas subject to higher risk of a catastrophic wildfire ignited by a Clearwater asset. The analysis helps identify locations where increased measures may be needed to mitigate wildfires. The analysis was conducted via aerial inspections and daily inspections from our PGD crew.

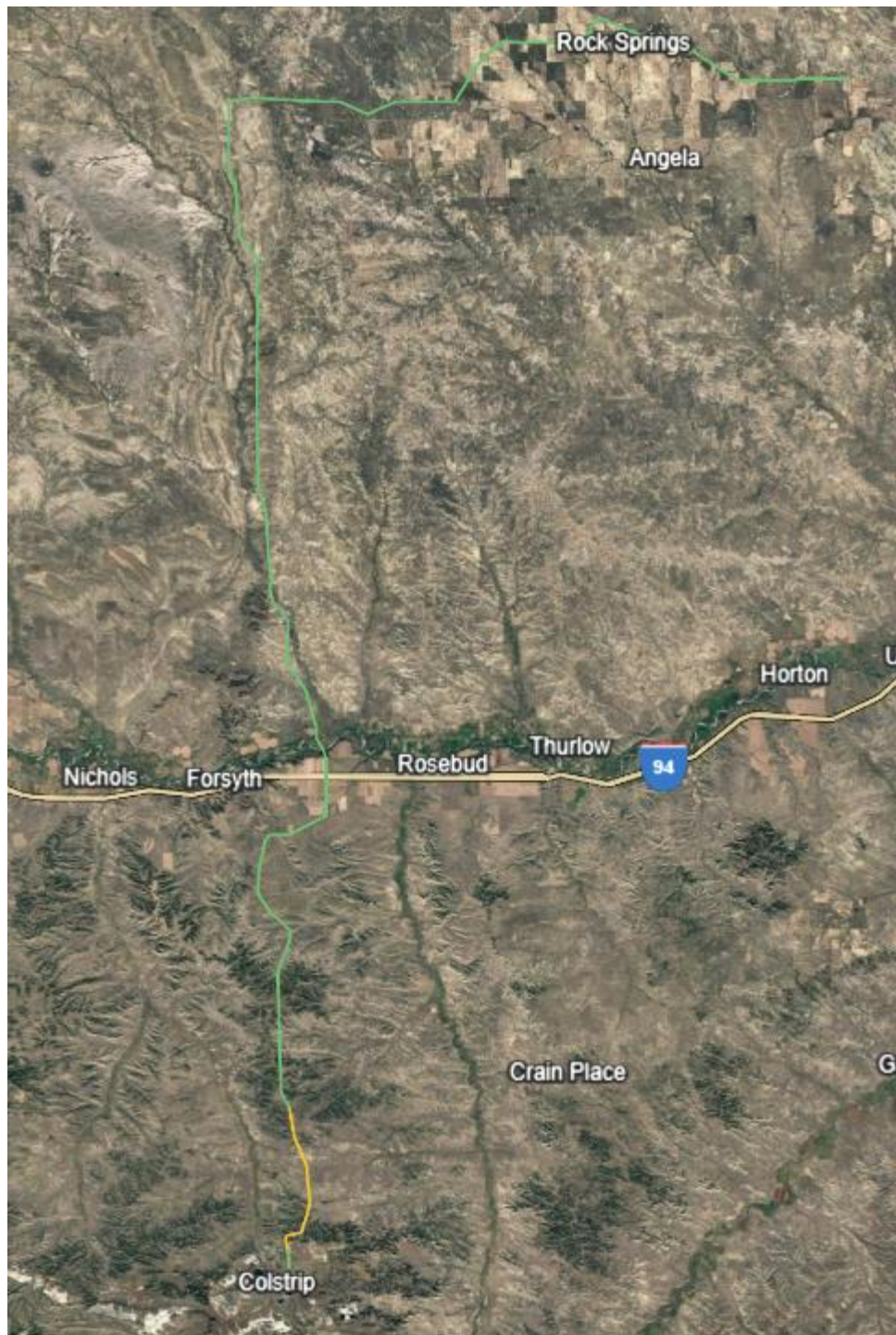


Figure 1: Risk Map

The foregoing map created from the analysis identified approximately 7 miles of Generation Tie-Lines infrastructure located in areas of high wildfire ignition risk from a total of 99 miles of Generation Tie-Lines facilities. Clearwater's high ignition risk areas are primarily located in the southern end of the corridor as shown in the map above. Clearwater has prioritized that area for vegetation management to address the risk.

The strategies and programs that the Clearwater will use to inspect, maintain, repair, and operate its electric facilities:

Clearwater implements and maintains a comprehensive Operations and Maintenance ("O&M") Program designed to ensure the safe, reliable, and compliant operation of all wind generation and interconnection facilities. The Program applies to all generation assets, including wind turbine generators ("WTGs"), nacelles, rotors, blades, towers, pad-mount transformers, medium-voltage collection systems, substation equipment, switchgear, and interconnection facilities, and is intended to (i) maximize asset availability and performance, (ii) mitigate fire and electrical hazards through proactive maintenance and monitoring, and (iii) ensure compliance with all applicable federal, state, local, and utility interconnection requirements.

The Program employs a risk-based maintenance approach incorporating predictive, preventive, and corrective maintenance strategies. This includes routine equipment inspections, oil analysis, vibration monitoring, thermographic analysis, electrical testing, performance monitoring through SCADA systems, and condition-based assessments. Work tasks are generated from inspection results, turbine fault codes, performance data analytics, and Original Equipment Manufacturer ("OEM") recommendations, recorded in the Computerized Maintenance Management System ("CMMS"), prioritized by criticality and safety risk, and incorporated into an Annual Maintenance Plan.

Routine inspections are conducted via one or a combination of the following: daily SCADA performance reviews; weekly site walkthroughs; monthly visual turbine inspections; semi-annual oil sampling and analysis; annual comprehensive turbine audits including tower internals and electrical systems; biennial blade inspections via rope access or drone-based imagery; and periodic infrared thermography of electrical equipment. All critical wind generation equipment—including gearboxes, generators, converters, main bearings, pitch systems, yaw systems, transformers, and collection system switchgear—are inspected in accordance with OEM specifications and industry best practices, with inspection frequency adjusted based on equipment age, operational conditions, environmental factors, and regulatory requirements. Inspections are documented in the CMMS, including the date, technician identity, findings, and corrective actions taken or recommended.

The Operations and Maintenance Team annually reviews and revises the Annual Maintenance Plan to ensure alignment with program objectives, turbine performance trends, and compliance with NERC, IEEE, NFPA, and jurisdictional authority requirements. Modifications to the Plan are documented in the CMMS with stated justifications. Work assignments are distributed via mobile work order management platforms, and completion is verified through quality control inspections, performance validation testing, and operational acceptance procedures. Completion metrics and turbine availability statistics are tracked and reported monthly.

The Program includes multiple layers of asset protection and risk mitigation, including real-time SCADA monitoring with alarm management protocols, fire detection system testing within nacelles and towers, oil condition monitoring for lubrication systems, lightning protection system verification, predictive analytics for component degradation, cybersecurity controls for operational technology systems, emergency response procedures, and incident investigation and corrective action processes. All turbine failures, safety incidents, and fires are documented, investigated, and reported in accordance with regulatory requirements and corporate standards.

In cases where maintenance or repair work is impeded by external factors (e.g., component supply chain delays, weather conditions, permit restrictions, or interconnection outage limitations), Clearwater implements mitigation measures, including temporary operational constraints, turbine derates or shutdowns, increased monitoring frequency, expedited procurement procedures, and coordination with transmission operators to schedule planned outages. These actions are documented in accordance with the Risk Mitigation and Deviation Management Process, with notifications provided to all relevant stakeholders including regulatory authorities, utility interconnection partners, and project finance parties.

as contractually required.

The strategies and programs that clearwater will use to perform vegetation management:

The Company shall implement and maintain a Transmission Vegetation Management Program designed to mitigate the risk of vegetation encroachment into the Vegetation Action Threshold (“VAT”). The Program applies to both North American Electric Reliability Corporation (“NERC”)-applicable and non-NERC transmission facilities and is intended to (i) prevent vegetation-related outages, (ii) reduce fire hazards by managing fuel loads, and (iii) ensure compliance with all applicable federal, state, and local vegetation-related regulations.

The Program shall employ an integrated vegetation management approach. This includes the identification of incompatible vegetation through inspection, promotion of compatible species, and application of control methods—such as pruning, removal, herbicide treatment, and mowing—based on environmental impact, site characteristics, security, economics, and land use. Work tasks shall be generated from inspection results, recorded in the Transmission Vegetation Management Software (“TVMS”), prioritized, and incorporated into an Annual Work Plan.

Routine inspections shall be conducted via one or a combination of the following: ground patrols; aerial surveys; LiDAR; and imagery analysis. All NERC-applicable lines and designated non-NERC lines shall be inspected annually, with no more than 18 months between inspections, provided that inspection frequency may be adjusted based on environmental or operational conditions (e.g., fuel loading, weather events, tree mortality, or landowner interference). Inspections shall be documented in TVMS, including the date, inspector identity, and findings. Independent peer reviews shall supplement inspections.

The Transmission Vegetation Management Team shall annually review and revise the Annual Work Plan to ensure alignment with its program objectives and compliance with NERC FAC-003 standards and HB490. Modifications to the Plan shall be documented in TVMS with stated reasons. Work assignments shall be distributed via a GIS/mobile platform, and completion shall be verified through field audits and quality control inspections. Completion metrics shall be calculated based on finalized work tasks.

The Program shall include multiple layers of protection, including monitoring vegetation growth and bend-in potential, conducting QA/QC reviews, measuring clearance-to-wire distances, and reporting qualifying vegetation-related outages in accordance with NERC requirements.

In cases where work is impeded by external factors (e.g., landowner refusal, regulatory restrictions, natural disasters), the Company shall implement mitigation measures, including short-cycle prescriptions and increased inspection frequency, to prevent vegetation encroachment. These actions shall be documented in accordance with the Vegetation Mitigation Process.

All work shall be documented in TVMS and comply with industry standards, including ANSI Z133.1-2017, OSHA 1910.269, ANSI A300 (Parts 1, 7, and 9), and ISA Best Management Practices. QA/QC procedures and independent inspections shall be conducted to ensure adherence to specifications and program integrity.

The strategies for modifications or upgrades to electric facilities and preventative programs that clearwater will employ to reduce the risk of its electric facilities igniting a wildfire:

NextEra Energy employs a system-wide asset modification program to reduce wildfire ignition risk. All upgrades or modifications to electric facilities are prescribed based on documented inspections and environmental risk assessments. These upgrades are guided by annual inspections using aerial ground-based technologies, with site-specific work prescriptions development based on vegetation growth, environmental conditions, and fire risk. Work is prioritized and tracked in the TVMS and incorporated into an Annual Work Plan. Preventative measures include maintaining vegetation clearance beyond regulatory thresholds, early herbicide application, mowing, and mulching to reduce fuel loads, removal of hazard trees and incompatible species, and the use of LiDAR, drone imagery, and satellite analytics to enhance situational awareness.

Transmission corridors are inspected 100% annually, with adjustments based on regional fire risk. High-risk areas (e.g., California, Arizona, Florida) are scheduled ahead of fire seasons. All work is subject to quality control audits and compliance with NERC FAC-003 standards.

In cases of restricted access or external constraints, mitigation protocols require short-cycle prescriptions, increased monitoring, and documentation under the Vegetation Mitigation Process.

Wind facilities follow the same vegetation protocols for transmission interconnects and ROWs. No separate turbine-specific wildfire program is defined.

Office operations include annual planning, GIS-based work assignment, real-time field updates, and regulatory reporting. All modifications and preventive actions are documented and auditable.

The strategies and methods for de-energizing power lines and modifying electric facility operations to mitigate potential wildfires taking into consideration the ability of clearwater to reasonably access the proposed electric facility to be de-energized, the balance of the risk of wildfire with the need for continued supply of electricity to a community, and any potential impact to public safety, first responders, and health and communications infrastructure:

Clearwater shall implement operational protocols to mitigate the risk of wildfire ignition from electric facilities, including the potential de-energization of power lines and modification of facility operations. These protocols shall be applied in accordance with documented vegetation conditions, environmental risk assessments, and system reliability standards.

Field personnel shall promptly notify the System Operations Center upon identification of vegetation or other hazards within the defined Trigger Distance. The System Operators shall evaluate the risk and determine whether operational modifications, including de-energization, are warranted based on reliability, safety, and wildfire risk. Clearwater shall maintain reasonable access to all electric facilities for inspection, vegetation management, and emergency operations. In cases of restricted access due to landowner refusal, regulatory constraints, or natural disasters, the Company shall escalate the matter to

senior management and implement mitigation measures, including short-cycle prescriptions and increased monitoring. Decisions regarding de-energization shall balance the risk of wildfire ignition against the necessity of maintaining electric service to affected communities. System Operators shall consider the availability of alternate supply paths, distributed energy resources, and the criticality of impacted infrastructure. Prior to any de-energization, Clearwater shall assess potential impacts to public safety, first responders, healthcare facilities, and communications infrastructure. Where feasible, the Company shall coordinate with emergency services and stakeholders to implement contingency measures, including backup generation and alternative service routing.

All hazard notifications, operational decisions, and mitigation actions shall be documented in the Company's vegetation and operations management systems. Clearwater shall retain records in accordance with applicable regulatory requirements and report qualifying vegetation-related outages to the appropriate reliability entity.

The methods clearwater intends to use to restore its electrical system in the event systems are de-energized for the prevention of a wildfire:

In the event that a fire occurs, the safe and expedient response actions are essential to protect the health, life, and safety of personnel, the environment, and minimize equipment damage. Sites shall have a list and location map of fire extinguishers.

Person in Charge (PIC) Responsibilities

The PIC shall determine the following:

1. Need to muster or evacuate personnel
 - a. a) In this event, teammates shall remain in muster location until the "all clear" is issued by Unified Command or the PIC
2. Equipment or activities to be shutdown, stopped, or isolated
3. IF Renewable Site - Report Fire to ROCC
4. IF Fossil, Instruct Control Room to notify local Fire Rescue and EMS
5. OR IF Renewable Site - PIC will notify local Fire Rescue and EMS
 - a) In the event local Fire Rescue or EMS is dispatched, designate site personnel to escort Fire Rescue, EMS, and HAZMAT to the fire location and provide specific information about equipment, hazardous chemicals, electrical sources, fuels, lithium-ion batteries, or other risks. NOTE: Fire Rescue once on site, shall then assume situational control.
 - b) Refer to off-normal procedures for specific actions as applicable.

RACE Protocol

A person discovering a fire shall follow the **RACE** protocol as described below:

Rescue anyone in danger (only if safe to attempt);

Alarm, call the ROCC (via plant phone, cell, or 2-way radio) to report the fire: Person in Charge (PIC) shall make the determination to call 911 and sound the alarm

Report the following:

1. Explain the location and cause, if known, of fire
2. List the injuries, if any, that have occurred
3. Relay any actions, if any, that have been taken to extinguish an incipient stage fire

Contain the fire (only if safe to do so)

Extinguish the incipient stage fire (only if trained and it is safe to do so)

A person discovering a fire in an incipient stage shall choose to attempt extinguishing the fire only if the following two criteria are met:

1. Fire can be extinguished or controlled with 1 portable fire extinguisher, and
2. They perceive an adequate level of safety to extinguish the fire

Note: Fire-fighting efforts beyond incipient stage shall be performed by only local Fire Rescue. Restoration should not commence until the On-Site Team certifies the following:

- All vegetation hazards have been removed
- Required clearances have been re-established
- The affected right-of-way has been inspected and documented

Upon completion of hazard mitigation, the On-Site Team shall notify the ROCC. System Operators shall evaluate system readiness and authorize re-energization in accordance with applicable reliability standards and operational protocols.

Re-energization shall require formal authorization. Clearwater will document:

- Date and time of hazard clearance
- Inspection results and clearance measurements
- Notifications to System Operations
- Identity of personnel authorizing restoration

Prior to restoration, Clearwater shall notify ☐

- Public safety agencies and emergency responders.
- Operators of critical infrastructure (e.g., hospitals, communications networks).
- Affected customers and community representatives.

Clearwater shall verify readiness of protective systems and confirm that backup or alternate supply systems are operational where applicable.

Protective Systems:

- SCADA
- Relay Settings

All restoration activities shall be recorded in Clearwater's vegetation and operations management systems. Records shall be retained in accordance with applicable regulatory requirements and made available for audit or review.

The estimated incremental costs associated with implementing the plan, including system improvement and upgrades for a regulated utility:

Clearwater is not a regulated utility. The fire mitigation measures are built into the operating expenses for the site and are not incremental.

Community outreach and public awareness efforts before and during a wildfire season:

Clearwater shall implement a proactive community outreach and public awareness program to educate stakeholders on wildfire risks, prevention measures, and emergency protocols before and during wildfire season.

Clearwater shall disseminate wildfire safety information through multiple channels, including:

- Company website.
- Local news outlets and public service announcements.
- Community meetings and town hall events.

Educational materials shall include:

- Guidelines for vegetation clearance around private property.
- Instructions for reporting vegetation hazards near electric infrastructure.
- Information on planned de-energization protocols and restoration procedures.

Clearwater shall establish and maintain formal partnerships with local fire departments, emergency management agencies, and municipal governments to:

- Share wildfire risk assessments and mitigation plans.
- Coordinate public messaging and emergency response strategies.
- Participate in joint training, drills, and community preparedness events.

Clearwater shall engage with:

- Critical infrastructure operators (e.g., hospitals, communications providers).
- First responders and public safety officials.

Potential participation, if applicable, with state of local wildland fire protection plans of wildfire mitigation plans:

Clearwater maintains an active and collaborative relationship with state and local fire protection agencies and emergency management departments. The site team regularly engages with local fire departments to ensure coordinated emergency response protocols and mutual understanding of site-specific fire safety systems and procedures.

Clearwater is committed to serving as a resource partner to state and local officials in the ongoing development and enhancement of regional wildland fire protection and wildfire mitigation planning efforts. Clearwater welcomes opportunities to participate in collaborative planning initiatives, share operational best practices from our renewable energy portfolio, and contribute technical expertise regarding fire prevention and response at utility-scale generation facilities.

Table 1. Wildfire Risk Assessment by Asset Type

	Turbines (Count)	Substations (Count)	Generation Tie-Lines (Miles)
Very High			
High			
Moderate			
Low			
Very Low	36		