minnesota power

AN ALLETE COMPANY

NORTH DAKOTA

WILDFIRE MITIGATION PLAN

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1 Message from Executive Leadership

Safety is a core value at Minnesota Power, and we take seriously our duty to deliver safe and reliable energy to our customers while also safeguarding people who live near our infrastructure. This Wildfire Mitigation Plan describes the steps we will take to protect the North Dakota public and limit potential impacts to infrastructure in the event of a wildfire event.

As extreme weather events occur, wildfire risks are growing and posing a greater threat to communities across the nation and northern Great Plains.

Our Wildfire Mitigation Plan has three main goals: First, minimize the risk of wildfires caused by our electric assets in North Dakota through proactive maintenance and system upgrades. Second, minimize the risk of injuries to wildfire responders who encounter our electrical assets in their duties. Third, prevent serious damage to our electrical assets from wildfires ignited by other sources to maintain electric reliability in North Dakota.

Technology continually improves and expands in scope, allowing us a better “look” into the performance of our HVDC transmission line in North Dakota and identify potential improvements to the system. Weather forecasting has improved and now gives us more accurate and timely warnings of increased fire danger.

Minnesota Power evaluates and adopts new technology as appropriate for our system and is committed to maintaining and improving its assets in North Dakota. Modernization projects improve operational mitigations and allow rapid response to high fire danger.

In short, through new technology and system upgrades, we can better predict high wildfire danger, operate our system to minimize risks, and work to continually improve those operations.

This plan was drafted to reflect Minnesota Power’s commitment to the three goals provided above and to meet North Dakota’s wildfire plan statutory framework. Minnesota Power is committed to the safe operation of its North Dakota assets and to protecting communities and landowners that have welcomed us. We look forward to working with our North Dakota partners to improve wildfire mitigation in the state.

Josh Skelton
Minnesota Power Chief Operating Officer

2 Introduction

2.1 Definitions and Acronyms

Circuit Breaker: Device that is connected to transmission or bulk delivery feeders at the substation level for interrupting power flow.

Community Engagement: Customer outreach efforts around fire preparedness, mitigation plan efforts, and any actions related to wildfire prevention or emergency response.

Contingency: The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element.

Danger Tree: A tree that is dead, dying, diseased, structurally unsound, or that is within close proximity or has the ability to strike electrical equipment**.**

Distribution Lines: Lower-voltage lines that deliver electricity to end users.

Emergency De-Energization: Immediate shutdown of electrical circuits or equipment in response to active fire threats or imminent ignition risk, often without prior notice.

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

Energy Management System (EMS): A computer-based control system used to monitor, control, and optimize the performance of the generation and transmission system.

Encroachment Policy: Action plan to operate transmission and distribution assets with a fire that has originated away from and is burning towards or into electric utility equipment.

Fire Weather Conditions: Meteorological factors that increase fire risk (e.g., wind, heat, low humidity, drought).

Emergency Response Plan (ERP): A documented set of procedures and actions designed to prepare for, respond to, and recover from emergency situations.

Galloping: High-amplitude, low-frequency oscillation of overhead powerlines caused by wind. It is often exacerbated by ice or snow accumulation on the conductors and can cause the conductors to come in close proximity to one another.

Geographical Information System (GIS): Our system for recording geographic data including the electronic mapping of all Minnesota Power assets.

High Fire Risk Circuits: Those circuits that have been determined to be high risk for fire based on burn probability data from the United States Forest Service (USFS).

Hot Work: Specific work that can be done on or near (within the minimum approach distance) a line or other equipment without requiring that it be disconnected from its source of electrical energy.

High-Voltage Direct Current (HVDC): Minnesota Power's +/- 250KV line and converter stations that transport Direct-Current (DC) power between Center, ND and Duluth, MN.

Ignition Source: Any object, condition, or activity that can initiate combustion and start a wildfire (e.g., spark, lightning, thermal event).

Minimum Approach Distance (MAD): The minimum safe distance that a worker must maintain from energized electrical conductors or equipment.

NIMS National Incident Management System (NIMS): A standardized framework for managing emergencies across jurisdictions and disciplines, ensuring coordinated response.

North Dakota Department of Emergency Services (ND DES): North Dakota's central coordinating agency for public safety communications, prevention, protection, mitigation, response and recovery.

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

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

Public Safety Power Shutoff (PSPS): The last-resort practice of proactively turning off the power to customers or service areas during times of extreme weather to reduce the probability of wildfire ignition by electric utility infrastructure.

Qualified Electrical Worker (QEW): A worker trained and capable of recognizing electrical hazards to which s/he may be exposed having the skills and techniques necessary to control or avoid these hazards at the worksites.

Real-time Assessment: An evaluation of Transmission system reliability using real-time data to assess existing (pre-Contingency) and potential (post-Contingency) operating conditions. Requirements for Real-time Assessments are specified in North American Electric Reliability Corporation (NERC) reliability standards.

Recloser: Automatic distribution level circuit breaker that restores power after a fault; may be disabled during fire risk periods.

Reclose/Reclosing: A programmed process in devices that control electric grid breakers that allows the device to attempt to clear a fault and restore power.

Red Flag Warning: Alert issued when fire weather conditions are expected to increase the risk of fire danger.

Regulatory Compliance: Adherence to rules from agencies like NDPSC.

Reliability Coordinator: The entity that is the highest level of authority who is responsible for the Reliable Operation of the Bulk Electric System, has the wide area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Midcontinent Independent System Operator (MISO) is the Reliability Coordinator for Minnesota Power.

Risk Assessment: Evaluation of hazards and vulnerabilities related to wildfire.

SCADA (Supervisory Control and Data Acquisition): System for remote monitoring and control.

Situational Awareness: Real-time understanding of environmental conditions, asset status, and fire behavior to support informed decision-making and rapid response on operations related to transmission and distribution asset operations.

Substation: Facility where voltage is transformed for transmission or distribution.

System Hardening: Upgrading infrastructure to withstand fire, wind, and other hazards.

Transmission: An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems.

Transmission Lines: High-voltage lines that transport electricity over long distances.

Vegetation Management: Strategic approach to clearing or pruning vegetation near power lines to increase reliability, public safety, and reduce fire risk.

Wildfire Mitigation Plan (WMP): Formal strategy to reduce wildfire risk from utility operations.

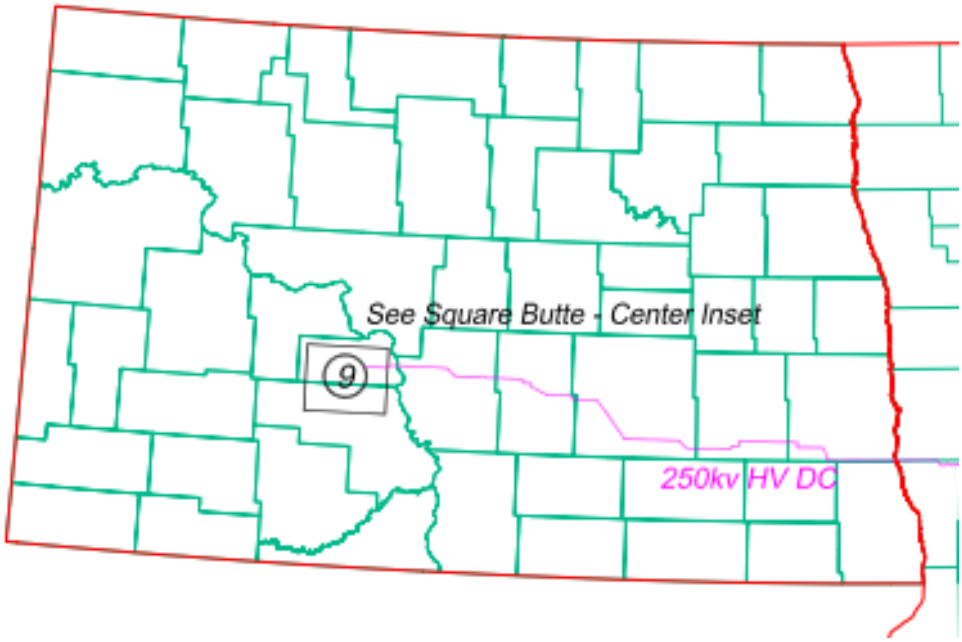
2.2 Minnesota Power Overview

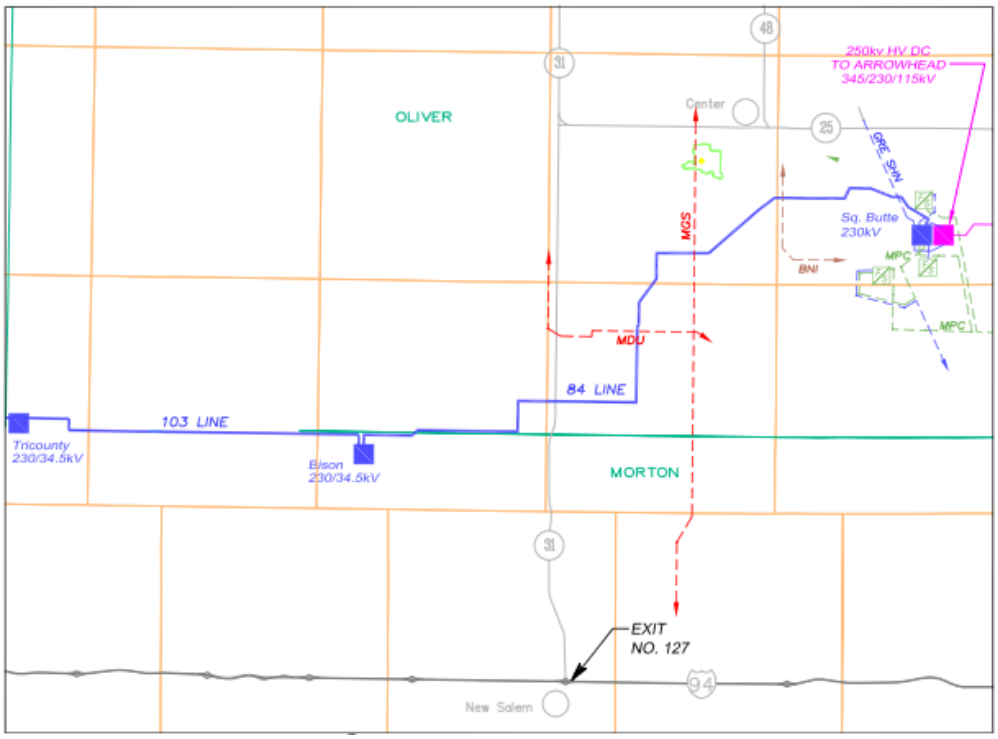
Minnesota Power, a division of ALLETE, Inc., is a regulated electric utility headquartered in Duluth, Minnesota. Its primary function is to generate, transmit, and distribute electricity across a broad service territory in northeastern Minnesota. Covering approximately 26,000 square miles, Minnesota Power serves around 150,000 residential and commercial customers, 14 municipalities, and several large industrial clients, including some of the nation's most energy-intensive industries such as mining and paper production.

The utility operates a diverse mix of energy generation assets, including coal-fired plants like the Boswell Energy Center, biomass and coal facilities such as Hibbard and Rapids Energy Centers, wind farms like Taconite Ridge and Bison, hydroelectric stations including Thomson and Fond du Lac, and smaller solar and natural gas installations. Its transmission infrastructure includes over 9,500 miles of lines and 162 substations across Minnesota and North Dakota, supporting a robust and reliable grid.

2.3 Minnesota Power Service Territory

Minnesota Power owns and operates three (3) transmission lines across North Dakota but serves no North Dakota customers directly. Our primary service territory and customer base is located in northeast Minnesota.





2.4 Transmission Assets

+/-250kV HVDC

- 234 Miles in North Dakota (465 miles total)
- Aluminum lattice and self-supporting tubular steel
- ACSR Conductor

230kV AC

- 33 miles
- Wood pole H-frame and self-supporting tubular steel
- ACSS/TW Conductor

2.5 Wildfire Mitigation Plan Overview

Minnesota Power's North Dakota Wildfire Mitigation Plan (WMP) is designed to proactively reduce the risk of wildfires associated with electric infrastructure throughout North Dakota. As the frequency and severity of wildfire events continues to increase, the plan outlines a comprehensive strategy to protect public safety, maintain grid reliability, and comply with emerging regulatory frameworks.

The plan was created companywide across many business units and focuses on identifying high-risk areas, implementing preventive measures, and coordinating emergency response efforts. It reflects Minnesota Power's commitment to responsible utility operations and environmental stewardship, especially in regions where vegetation and weather conditions heighten wildfire risk.

While efforts to reduce wildfire risk go back decades, Minnesota Power formalized its first comprehensive WMP in North Dakota in 2025 to meet the framework set forth in North Dakota law.

Minnesota Power's WMP is divided into 5 key areas including:

- Situational Awareness
- System Preparedness
- Operational Practices
- Vegetation Management
- Communication and Public Outreach

3 Situational Awareness

3.1 Wildfire Risk Data

To better understand the wildfire risks where Minnesota Power assets exist, we look to the burn probability data from the USDA Forest Service, also referred to as the Wildfire Likelihood. This dataset, along with other supporting data from the USDA Forest Service, guides our wildfire risk assessment.

The burn probability data represents an annual probability of wildfire burning in a specific location in North Dakota. This data set was produced with the Forest Service Geospatial Fire Simulator (FSim), and was resampled by increasing the number of data points to achieve a finer resolution of 30 meters.

3.2 Wildfire Risk Assessment

Minnesota Power maintains a relatively small footprint in North Dakota. We own and operate three (3) transmission lines across the state but serve no customer load. The burn probability data shows that nearly all transmission circuit miles are in low or moderately low risk areas, with only two small areas of moderate wildfire risk in eastern North Dakota. Overall, our assets are in lower burn probability risk areas compared to many other areas of the state as shown in the statewide map. While these areas have lower burn probability, we understand that wildfires are a serious threat in all areas during dry weather conditions.

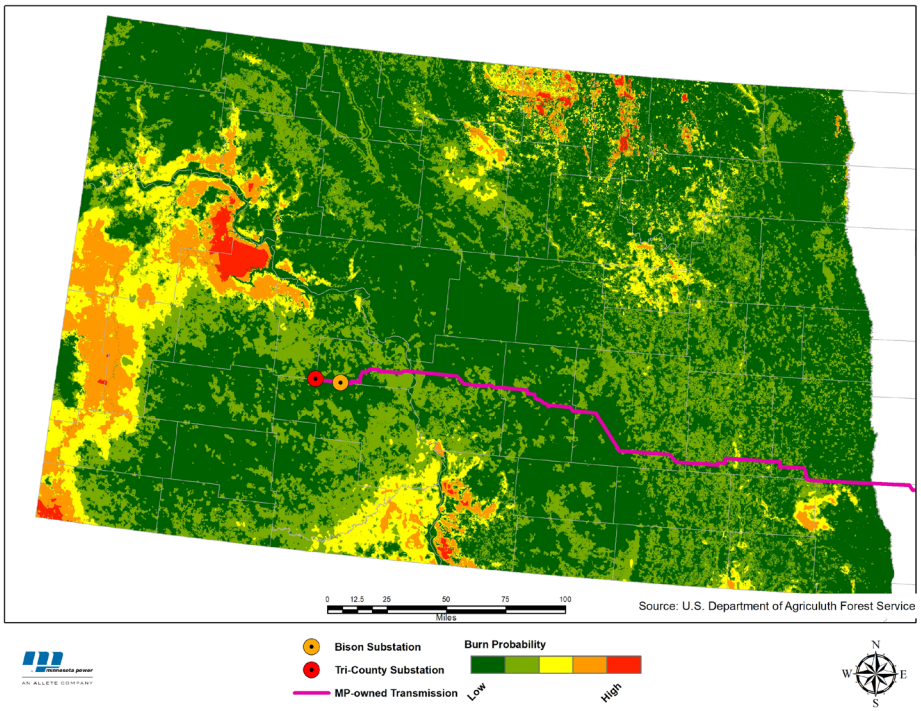


Figure A: MP-Owned Transmission - Burn Probability for North Dakota, USDA Forest Service.

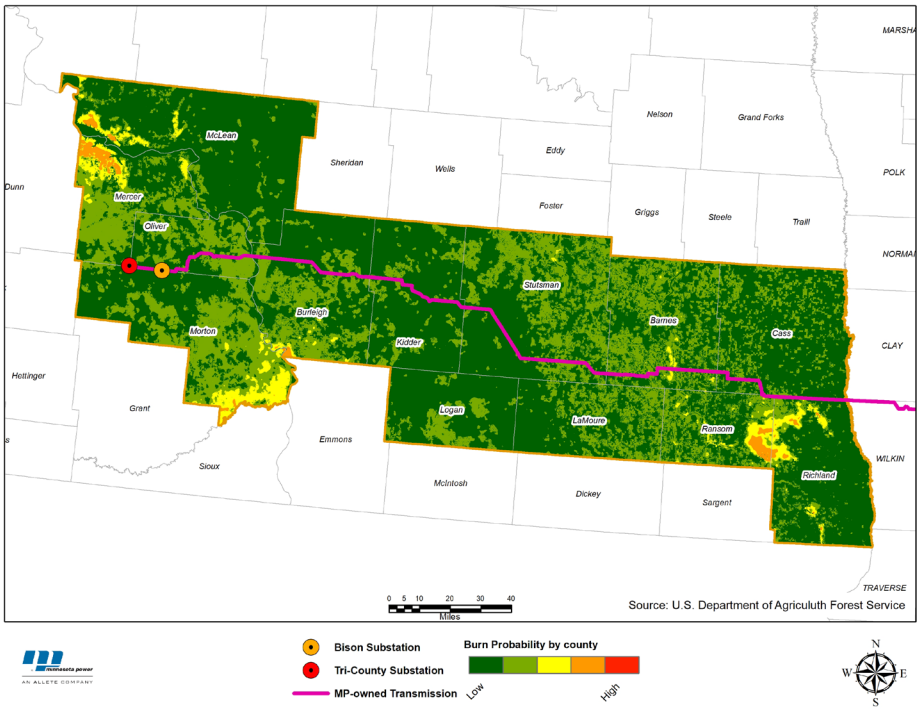


Figure B: Minnesota Power transmission lines with High or Moderately High Burn Probability within 10-mile corridor of transmission lines in North Dakota.

With no direct customers in North Dakota, Minnesota Power is able to approach all wildfire prevention efforts, including Vegetation Management and operational practices, in a manner that maximizes safety and minimizes potential fire hazards by being able to change or delay work when dangerous fire conditions exist. These practices will be described in more detail in the associated sections below.

3.3 Transmission System Monitoring

The Minnesota Power System Operations department monitors and controls assets in North Dakota by utilizing its Energy Management System (EMS) and Supervisory Control and Data Acquisition (SCADA). This provides real-time asset information regarding transmission line status, abnormal alarms, real and reactive power flows, voltage levels, and status of reactive resources via multiple system displays and summaries. These displays are monitored 24 hours a day and 365 days a year by North American Electric Reliability Corporation (NERC) certified Transmission Operators and allows most actions to be taken remotely through the SCADA system.

3.4 Weather Monitoring

Minnesota Power's System Operations, Service Dispatch, and ALLETE Security & Emergency Management teams monitor the current weather and forecast conditions 24/7 using numerous sources including the National Weather Service (NWS) and the North Dakota Department of Emergency Services (ND DES), who establish wildfire danger levels in North Dakota. The ratings are low, moderate, high, very high, and extreme. Additionally, there are fire weather watches and red flag warnings that can be issued for heightened public awareness of critical fire weather conditions.

Wildfire Risk*	Description**
Low	Fires are unlikely.
Moderate	Some fires may be expected with moderate spread.
High	Fires are likely and may be difficult to control.
Very High	Fires start easily and may spread faster.
Extreme	Fires can start and spread rapidly. Erratic fire behavior.

** Fire danger information is found on the ND Response website.*
*** Excerpts from the North Dakota Fire Danger Rating Levels.*

4 System Preparedness

4.1 Physical Hardening

Minnesota Power has strengthened design standards for future maintenance and structure replacements. For example, structure hardening has been implemented in several areas to replace original aluminum lattice with tubular steel structures engineered for greater resilience. Another system hardening measure that has been implemented is adding airflow spoilers to areas where conductor galloping has been known to occur and minimize it. This measure helps mitigate potential sparks from a flashover that could occur during a galloping event.

4.2 System Inspections

Minnesota Power utilizes a variety of inspection techniques at various intervals. The four primary methods of inspection include helicopter aerial patrols, groundline inspection, ground based visual inspections, and climbing inspections.

Helicopter Aerial Patrols

This routine program involves visual aerial inspection of transmission lines and structures performed by a Minnesota Power inspector from a helicopter. These inspections provide an aerial perspective to locate significant non-conformances. This method is performed at a quarterly frequency on the +/- 250kV HVDC lines and twice a year on the 230kV AC lines.

Groundline Inspection

Groundline inspections are an above and below-grade assessment of wooden transmission pole strength. The procedure identifies poles that are weakened through decay, weathering or other physical damage, and/or that do not meet National Electric Safety Code (NESC) remaining strength requirements.

This program is performed on an eight (8) year cycle in accordance with the United States Department of Agriculture (USDA) Rural Utilities Service (RUS) Bulletin 1730B-121,'Wood Pole Inspection and Maintenance'.

Ground Based Visual Inspections

This program is utilized on an as-needed basis determined from the results of the helicopter aerial patrols. These inspections involve a Qualified Electrical Worker (QEW) equipped with binoculars and other tools to inspect transmission assets from a close distance by driving or walking up to each structure.

Climbing Inspections

Climbing inspections are utilized on an as-needed basis and involve a Qualified Electrical Worker (QEW) climbing the transmission pole or structure to inspect for defects in close proximity. It is a more detailed inspection for non-conformances when other inspection types cannot adequately assess the condition.

Minnesota Power occasionally incorporates additional inspection techniques, such as high-resolution imagery, infrared (IR) photography, drone-based imaging and/or detailed helicopter-aided aerial inspections in instances where other inspection techniques do not provide adequate assessment.

4.3 System Maintenance

Items identified from the inspection programs discussed in Section 4.2 are reviewed by the Minnesota Power transmission engineering department and the transmission line operations department to determine the proper solution as well as appropriate timing to implement the solution.

5 Operational Practices

Operational Mitigation involves actions or steps on how Minnesota Power operates the electric system to reduce the risk of wildfire ignitions from company assets. These actions can be used to prevent ignitions of wildfires, respond to existing wildfires, or both, depending on the scenario involved and current fire conditions. None of the actions listed below should be construed to prevent Minnesota Power from taking any action necessary during emergency situations.

5.1 System Operations

Minnesota Power Real-Time Operations uses situational awareness tools to respond appropriately to wildfire risks. The team evaluates information such as National Weather Service (NWS) alerts, ground reports, Geographic Information System (GIS) data, asset condition data from field maintenance and planning organizations, wildfire weather reporting, and other resources.

Real-Time Operation's actions may include, but are not limited to the following:

- Disabling automatic Reclosing
- Limit non-emergency work on facilities or assets
- Requiring onsite inspections before testing faulted equipment
- Emergency de-energization of equipment due to fire encroachment
- Curtailing transmission power schedules

Wildfire Risk*	Description**	Ops Level	Ops Actions
Low	Fires are unlikely.	Level 1	Normal Operations
Moderate	Some fires may be expected with moderate spread.	Level 2	Normal Operations
High	Fires are likely and may be difficult to control.	Level 3	Maintain situational awareness
Very High	Fires start easily and may spread faster.	Level 4	5.2.1, 5.2.2
Extreme	Fires can start and spread rapidly. Erratic fire behavior.	Level 5	5.1.1, 5.2.1, 5.2.2

** Fire danger information is found on the ND Response website.*
*** Excerpts from the North Dakota Fire Danger Rating Levels.*

5.1.1 Disabling Reclosing

System faults are usually temporary, such as those caused by a tree branch or animal contact. During normal operations, protective relays are programmed to remove the circuit or element from service and then attempt to re-energize the circuit or element by Reclosing. This Reclosing process allows time for the temporary fault condition to stop or clear before an attempt at re-energization occurs. If the fault condition still exists, the relay will open and take the circuit or element out of service, and Minnesota Power will treat it as a permanent fault. Reclosing increases reliability and enhances power system stability.

While Minnesota Power's AC Transmission Lines are not operated with Reclosing enabled, Minnesota Power's High Voltage Direct Current (HVDC) line has Reclosing enabled. During Extreme (Level 5) Fire Danger Levels, including Red Flag Warnings from the NWS or North Dakota DES, or when a wildfire is encroaching near the HVDC line, this Reclosing function will be disabled while conditions remain extreme. Running a circuit with Reclosing disabled is done to reduce any risk of energized electrical equipment starting a fire when the relay attempts to Reclose.

The decision to disable Reclosing will be coordinated with the Reliability Coordinator and any affected neighboring utilities. Even though Minnesota Power does not directly supply electricity to customers in North Dakota, assets operated there can affect the reliability of transmission system in North Dakota. All transmission-related actions taken will have a Real-time Assessment performed when time allows.

5.1.2 De-energizing Lines for Wildfire Encroachment

Wildfire encroachment occurs when a wildfire moves into a defined buffer space and threatens Minnesota Power facilities or assets in North Dakota.

When a wildfire encroaches on circuits or facilities, Minnesota Power may selectively disable Reclosing or de-energize the circuit as a preventative measure.

The decision for emergency de-energization of an asset will be coordinated in conjunction with the lead agency responsible for the fire response efforts, the Reliability Coordinator (RC), and any affected neighboring utilities. Even though Minnesota Power does not directly supply electricity to customers in North Dakota, assets operated there may affect the reliability of the transmission system in North Dakota. All Transmission related actions taken will have a Real-time Assessment performed when time allows.

5.1.3 Public Safety Power Shutoff (PSPS)

Public Safety Power Shutoff is the last-resort practice of proactively turning off the power to customers or service areas during extreme weather. At this time, Minnesota Power has not developed a PSPS plan. Such a plan, if developed, would not impact North Dakota residents as Minnesota Power does not have direct customers in North Dakota.

5.2 Work Practices

This section describes Minnesota Power's approach to work practices in the field performed by QEW line workers in times of elevated fire danger, in response to faults on the system, or actions after a fire event has occurred.

5.2.1 Field Practices

With no customer impact, work performed on lines in North Dakota is only completed while they are de-energized regardless of location or conditions.

During Very High (Level 4) or Extreme (Level 5) Fire Danger Levels, Minnesota Power will suspend non-emergency switching or work on affected circuits.

Emergency work will be allowed on a case-by-case basis, with the use of enhanced fire protection measures if it is determined the work must be completed for reliability or safety concerns. Examples of this may include removing downed cable on roadways, mitigating immediate hazards to the public, or reliability concerns in accordance with MISO directives.

5.2.2 Inspection of System Faults

Minnesota Power has a procedure that defines when an asset should be inspected after any operations during heightened fire conditions. When a permanent fault condition is suspected on circuits during Very High (Level 4) or Extreme (Level 5) Fire Danger Levels, those elements will be inspected prior to being placed back into service. When Momentary faults occur on circuits during Very High (Level 4) or Extreme (Level 5) Fire Danger Levels, those elements will be inspected as soon as practicable. In cases where causation is identified prior to an inspection, no inspection is necessary prior to re-energizing the asset.

The Transmission Line Operations Department will determine the type of inspection based on the location and access, then initiate inspections.

5.2.3 Restoration of Services

After a fire event and upon approval from the lead agency for fire response, aerial and/or ground inspections of all impacted circuit miles will be performed once conditions are deemed safe. Once inspections are complete, field operations will work in conjunction with engineering to develop a plan to restore the system in accordance with current design practices.

In the absence of direct customers in North Dakota, Minnesota Power is able to take a very conservative approach to the timeline for restorations. As a result, only emergency restoration activities will occur during Very High (Level 4) or Extreme (Level 5) Fire Danger Levels. All other restoration activities in the field will be postponed until fire danger conditions improve.

6 Vegetation Management

6.1 Minnesota Power Vegetation Management Plan

Minnesota Power's Vegetation Management Plan is comprised of a cycle-based vegetation maintenance program for transmission lines, an annual danger tree program, and an annual substation and associated facilities bare ground herbicide program.

Minnesota Power employs the International Society of Arboriculture (ISA) Certified Arborists to plan, direct, and inspect work activities.

6.2 Cycle-Based Vegetation Maintenance Program

The cycle-based vegetation maintenance program is scheduled every seven (7) years. Integrated Vegetation Management (IVM) standards are used to manage the rights-of-way (ROW). This approach identifies compatible and non-compatible vegetation and selects the best management method for control. IVM is compliant with the American National Standards Institute (ANSI) A 300, part 7 standard.

Minnesota Power vegetation management staff annually identify the segment or line that is scheduled for maintenance. Contracted work planners inspect the line and identify locations for vegetation maintenance activities. Work planners also notify landowners of upcoming activities. Vegetation management contractors then execute the work plan and complete activities using manual or mechanical methods, or through herbicide application, to control non-compatible vegetation within and adjacent to the ROW. Vegetation management contractors must comply with ANSI Z133, OSHA 1910.269, and state pesticide application laws.

Minnesota Power vegetation management staff perform an inspection after maintenance activities are completed and note any deficiencies. Any deficiencies are then sent to the vegetation management contractor for resolution.

6.3 Danger Tree Program

All Minnesota Power Transmission lines in North Dakota are aerial and/or ground inspected annually per the North American Electric Reliability Corporation (NERC) FAC-003 standard to identify any vegetation encroaching the minimum vegetation clearance distances identified in the standard along with any Danger Trees that pose a hazard to the operation of the transmission line. Data is collected and mapped electronically. Vegetation management contractors are then scheduled to perform any work required during the same calendar year.

6.4 Substation and Facilities Program

Substations and associated facilities are maintained annually with bare ground herbicide treatment. The treatment covers the entire area of the substation within the fence or barrier, and five feet outside the perimeter. Visual inspections are conducted on a periodic basis to ensure treatments are effective and to identify any plant resistance to herbicide control products.

6.5 Emergency Response

In the event of a transmission line outage, the Transmission Line Operations Department will carry out a patrol for the affected transmission line. Danger Trees or vegetation that are compromised by a storm or fire event are identified by location and sent to the vegetation management department for resolution.

Depending on the severity of the event, an assessment may also be conducted by a Minnesota Power ISA Certified Arborist. Vegetation that poses a hazard to continued operation of the line will be identified for pruning or removal and scheduled with a vegetation management contractor for resolution.

7 Communication and Outreach

Minnesota Power's North Dakota Wildfire Communications Plan is grounded in the need for safety when working or operating near electrical infrastructure. It also focuses on communicating with responding agencies and the general public because Minnesota Power does not have any utility customers in North Dakota.

7.1 Agency Outreach

In the event of a wildfire, the safety of any responding personnel such as firefighters is the priority for Minnesota Power. During such an event, designated Minnesota Power employees will contact North Dakota emergency managers to let them know the status of our assets and whether the assets are energized. The agency to be contacted is:

North Dakota Emergency Communications Center:
(701) 328-8100 or (800) 773-3259

7.2 Landowner Outreach

Minnesota Power maintains a database of landowners and lessees along the route of the HVDC transmission line in North Dakota and has a process in place for contacting them for maintenance or repair work. The company will use the landowner contact list and the existing process should landowners need to be contacted for any activities relating to a wildfire.

7.2.1 Landowner Vegetation Information

Minnesota Power maintains a link on its website to "The Right Tree" brochure. This guide can assist landowners with proper and compatible selection of vegetation for planting near electrical facilities.

The website also includes a brief description on how to report a tree near a powerline that may be compromised and the customer service phone number.

7.3 Community Outreach

If Minnesota Power needs to communicate information about its electric infrastructure to the general public in North Dakota, the information will be shared with TV and radio stations via a news release. Because Minnesota Power has no electricity customers in North Dakota, there will be little to no social media audience in the state and no database of customer phone numbers. Further, Minnesota Power anticipates any dissemination of information during a wildfire will be the responsibility of the Public Information Officer for the lead responding agency.

8 Emergency Response

8.1 Emergency Response Plan

Minnesota Power has established an Electric Emergency Response Plan (ERP) for the purpose of managing outages caused by storms and other natural disasters, civil unrest, major equipment failure, or other emergency-like events. It is intended to be simple, flexible, and easily adapted to specific emergency events.

The ERP utilizes the National Incident Management System (NIMS) which is a comprehensive national approach to incident management applicable at all jurisdictional levels and across functional disciplines. The ERP also addresses the operation of the Minnesota Power System. The plan remains focused on public safety, workforce safety and safety of outside aid.

9 Implementation and Improvements

9.1 Recent Accomplishments

Recent activity and accomplishments as part of the ongoing efforts to mitigate wildfires:

- Development of the North Dakota Wildfire Mitigation Plan.
- Increased frequency of substation bare-ground treatment to be performed annually instead of as-needed.
- Straightened structures to vertical orientation to maintain structural integrity.
- Replaced all insulators over freeway crossings,
- Following the June 2025 tornados, over 40 structures in eastern North Dakota were replaced with the more robust tubular steel structures.

9.2 Program Costs

Over 250 hours went into the development of this Wildfire Mitigation Plan. Annually Minnesota Power spends $50,000 on aerial patrols to inspect the condition of vegetation and line equipment. Additional inspections conducted in response to faults or related to wildfire events range from $5,000 to $10,000 per inspection depending on the location and inspection type required.

The cost for vegetation management on the North Dakota segments of Minnesota Power transmission lines is $150,000 per seven-year cycle. The annual cost for substation bare-ground treatments is $7,500. Lastly, various other costs are routinely incurred as part of planned physical hardening efforts and unplanned restoration activities. These efforts continue to improve the resiliency of Minnesota Power transmission lines across North Dakota.

10 Version History

Version	Change Description	Effective Date
1.0	Initial Release	Jan 1, 2026