DRAFT

Montana Alberta Tie Line (MATL)

Wildfire Mitigation Plan

November 26, 2025

MATL – DRAFT Montana Wildfire Mitigation Plan

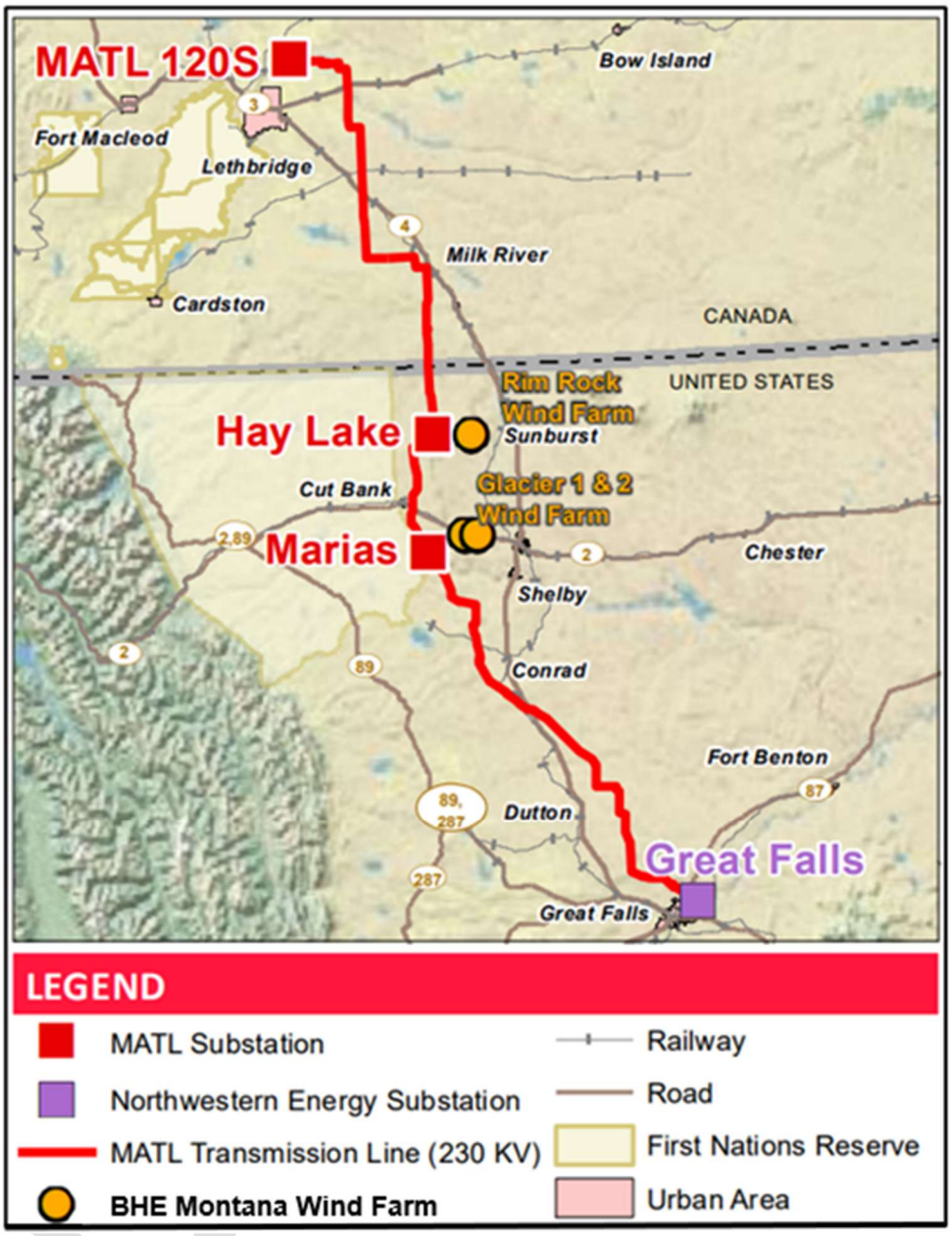
The objective of the MATL Montana Wildfire Mitigation Plan is to diligently implement a fulsome wildfire mitigation plan, complete with baseline operating procedures, and regular year-over-year revisions as deemed necessary by MATL's operations team. This plan has considered and complies with the requirements of the State of Montana as outlined in HB 490.

1. SCOPE:

1.1 MATL is an independent merchant transmission-only company operating in the State of Montana as MATL LLP. MATL has registered with the Western Electricity Coordination Council for the NERC functional entities of: Transmission Operator (TOP), Transmission Owner (TO), Transmission Planner (TP), and Transmission Service Provider (TSP). MATL is not a load serving entity. Instead, MATL sells transmission capacity to energy marketers for the purpose of exporting electricity produced in Montana and importing power into Montana. MATL has contracted with NorthWestern Energy to perform certain tasks related to the operation of MATL within Montana, and it also contracts out its maintenance and engineering services to various entities. As the NERC registered entity for the MATL Interconnected System, MATL retains responsibility for meeting compliance with the applicable NERC reliability standards and state law, including HB 490.

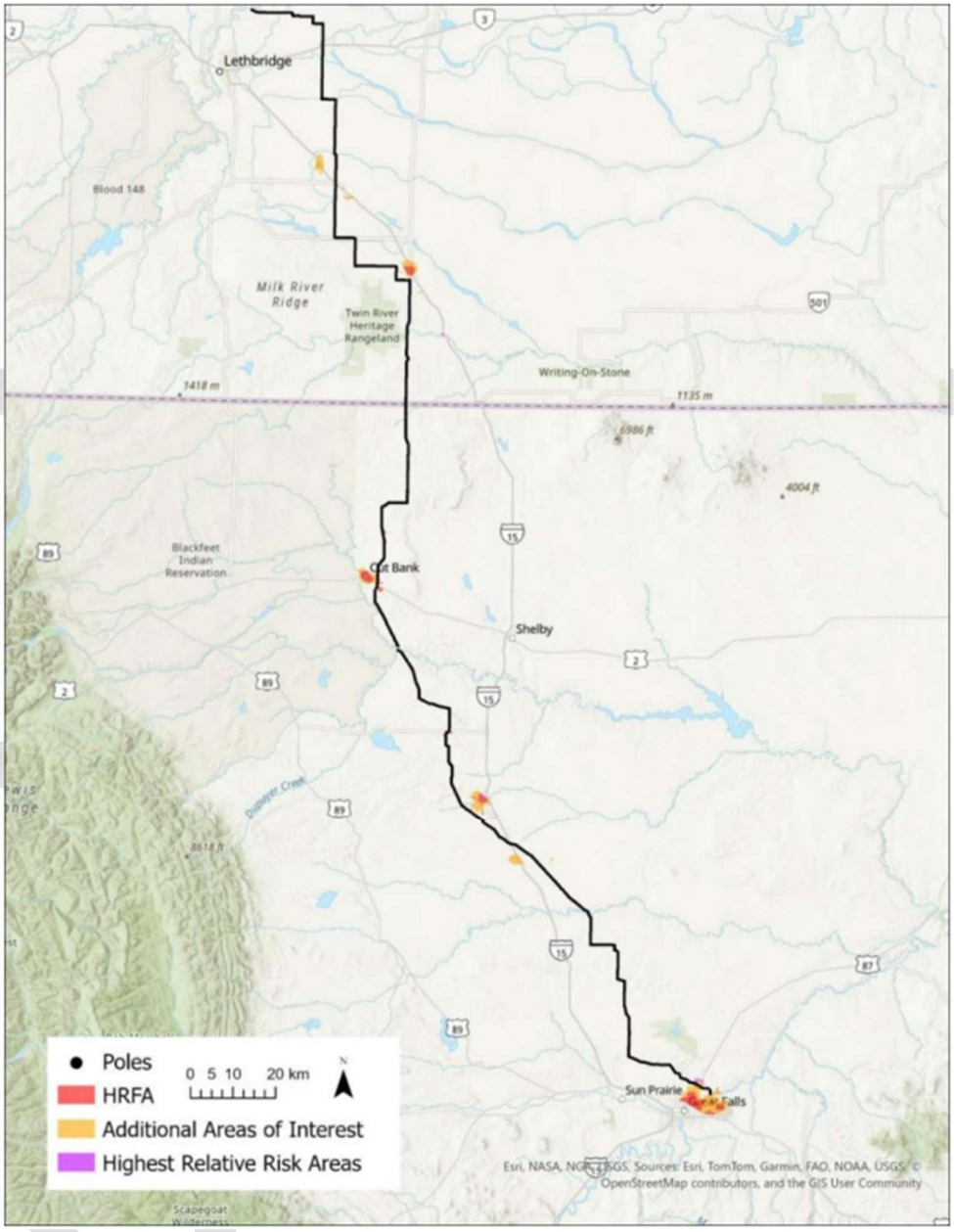
1.2 The MATL Montana Wildfire Mitigation Plan applies to areas within 50 ft (i.e., right-of-way easements) of the transmission facilities owned by MATL LLP within the State of Montana, specifically in the counties of Glacier, Pondera, Teton, and Cascade. These facilities include electric transmission structures and overhead conductors, located between the Great Falls Substation (owned by NorthWestern Energy) and the Canada/U.S. Border located west of Sweetgrass, Montana.[1] MATL also owns and operates the Hay Lake and Marias switching stations located near Cut Bank, Montana. A map of the transmission system is provided for reference below.

[1] HB 490, § 2(2)(a), requires description of "areas in which the electric facilities provider has electric facilities or electric transmission and distribution activities that may be subject to a heightened risk of wildfire."



MATL Transmission System

1.3 In the development of this plan, MATL has performed a wildfire risk assessment for the area of interest within 18 miles of the MATL transmission system to identify High Risk Fire Areas (HFRA). These HFRAs illustrate the wildfire risks related to values of risk for each section of the system, by season and by percentile for an overall rating. The below map outlines the identified HFRAs, which align with the urban centers of Great Falls, Conrad, and Cut Bank.



MATL High Risk Fire Areas

2. MAINTENANCE PRACTICES AND PROCEDURES

2.1 MATL shall ensure that its facilities are maintained consistently with NERC standard *FAC-501-WECC-4 Transmission Maintenance*, including updates to the MATL Transmission Maintenance and Inspection Plan (TMIP). The strategies and programs to inspect, maintain, repair, and operate its facilities in the State of Montana will include, at a minimum, detailed aerial inspections of the entire transmission system approximately once every 5-years, and line patrols (aerial

and ground) of the transmission system approximately once every year to monitor vegetation encroachment.[2] Wildfire prevention/preparedness is incorporated into core operations. Risk-based notifications will be identified and classified during these inspections, with repairs prioritized based on the below classification table:

Notification Classification	**Maximum time to repair**
Critical	0-18 months
Major	0-60 months
Minor	0-120 months

2.2 In addition to the inspections and repairs described above, as outlined in the below sections III, IV, & V, MATL will also:

- Follow prescriptive requirements for proactive vegetation management;
- Review alternatives for hardening the current transmission system;
- Implement tools for operational wildfire forecasting and situational; awareness in real-time; and
- Develop response and recovery plans for after an event that requires a proactive de-energization of the MATL Transmission System.

3. VEGETATION MANAGEMENT PRACTICES AND PROCEDURES

3.1 MATL management shall ensure that its vegetation management strategies and programs are materially compliant with NERC Standard FAC-003-5 Transmission Vegetation Management, through the implementation of its operating procedures as revised from time-to-time.[3] The vegetation management requirements include:

i. Prevent vegetation encroachments into the Minimum Vegetation Clearance Distance (MVCD)[4] of the facility as determined by the voltage and elevation of each structure along the transmission facility;
ii. Operating within facility ratings and rated operating conditions;

[2] HB 490, § 2(2)(b), requires description of "the strategies and programs that the electric facilities provider will use to inspect, maintain, repair, and operate its electric facilities."

[3] HB 490, § 2(2)(c), requires description of "the strategies and programs that the electric facilities provider will use to perform vegetation management."

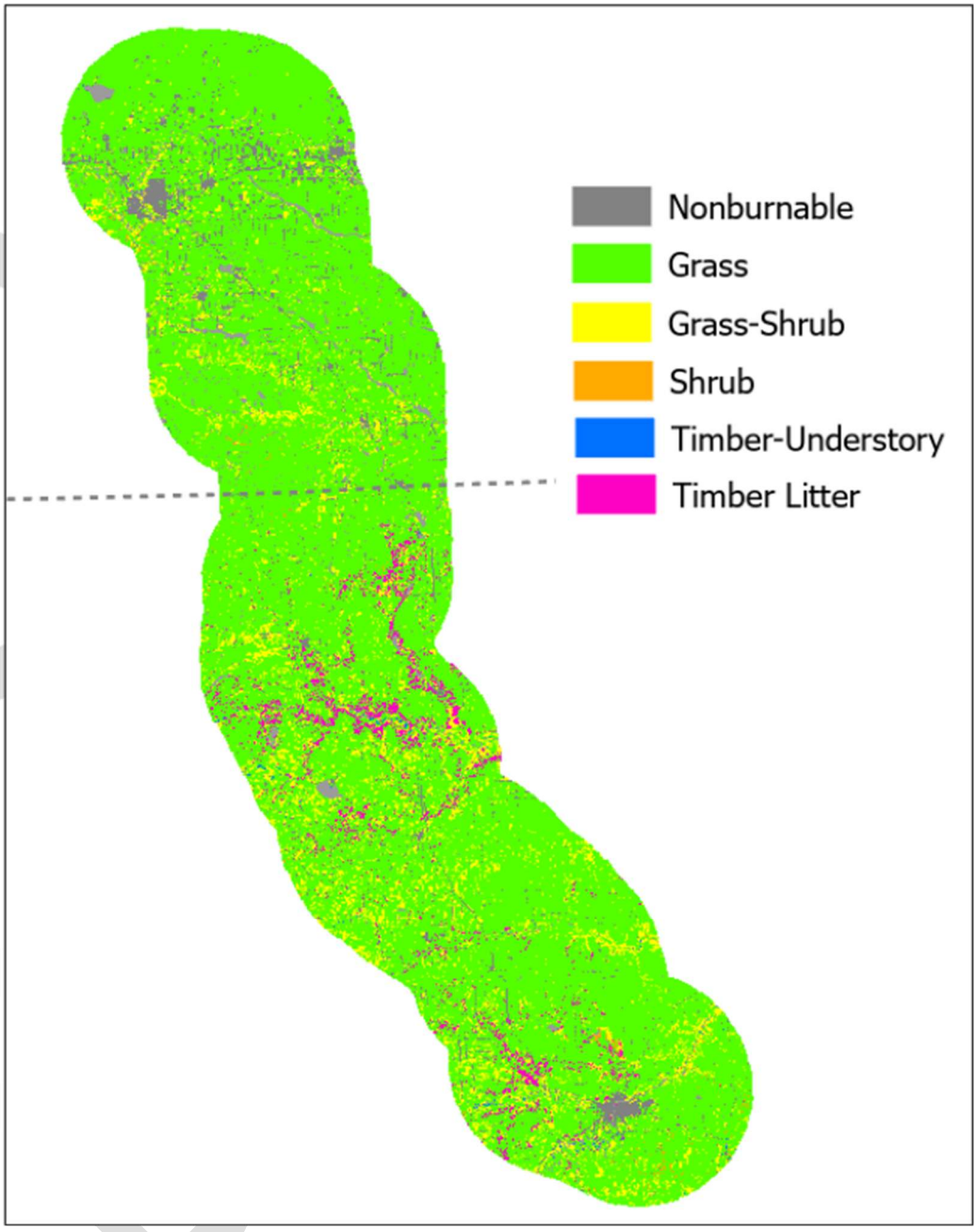
[4] MVCD is determined based on the voltage and elevation of the facility as described in Table 2 of NERC standard, FAC-003-5

iii. Documentation of strategies, procedures, processes, or specifications used to prevent the encroachment of vegetation into the MVCD;
iv. Timely notification of vegetation conditions likely to cause a fault to the control center with switching authority (i.e., NorthWestern Energy);
v. Implementation of corrective action plans when MATL is constrained from performing vegetation work and the constraint may lead to a vegetation encroachment;
vi. Vegetation inspection of 100% of the applicable transmission line at least once per calendar year, with no more than 18 months between inspections on the same right-of-way; and
vii. Documentation of modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made (provided they do not allow encroachment of vegetation into the MVCD).

4. ASSESSING RISK & TRANSMISSION SYSTEM HARDENING

4.1 MATL has completed an evaluation of its facilities for potential modifications or upgrade to mitigate the risk of igniting a wildfire,[5] and will review upgrade plans approximately once every 3 years. The evaluation is a risk assessment that considers fuel layers from a combination of the 2023 Montana Landcover Framework and 2023 USDA Cropland Data Layer[6] to capture fuels (such as grass, grass-shrub, shrub, timber-understory, timber litter). Given the binational nature of the transmission system, MATL has augmented this risk assessment with the 2024 FBP System Fuels Layer provided by Alberta Wildfire which includes 16 fuel types (with each defined by standardized fire behavior characteristics) and the Fire Behavior Fuels Model from Landfire.[7]

[5] HB 490, § 2(2)(d), requires description of "the strategies for modifications or upgrades to electric facilities and preventative programs that the electric facilities provider will employ to reduce the risk of its electric facilities igniting a wildfire."
[6] USDA Cropland Data Layer available: https://www.nass.usda.gov/Research_and_Science/Cropland/sarsfaqs2.php
[7] USDA Landfire -Wildland & Natural Resource Management: https://landfire.gov/fuel



MATL surface fuels map representing current conditions (U.S. fuels)

4.2 Weather inputs include assessment of the area within 60 miles of the transmission facilities, using weather data coverage ranging from 1994-2023 with variables such as temperature, relative humidity, precipitation, wind speed and wind direction. Fire Weather Indices (FWI) will be assessed for up to the 99th percentile for Spring, Summer, and fall and consider differences in fire behavior and vegetation curing through the seasons.

4.3 Risk assessment includes simulation of ignition points of actual structure locations within 650 feet, and fire spread behavior is modeled through terrain and landscape interaction.

4.4 Based on its risk assessment, MATL operations staff prepares project plans (as necessary) for approval by the approval authority with the estimated incremental costs[8] associated with implementing plans for required system improvements and upgrades.

5. SITUATIONAL AWARENESS, OPERATIONAL PROCEDURES, & PUBLIC SAFETY POWER SHUTOFF

5.1 MATL operations staff shall implement clear and staged strategies and methods for de-energizing power lines (i.e., Public-Safety, Power-Shutoff) and/or modifying transmission facility operations to mitigate potential wildfires. This will be implemented through MATL operating procedures as updated from time-to-time.

5.2 Operating procedures will take into consideration the ability of MATL to reasonably access the facility to be de-energized and it will balance the risk of wildfire with the need for continued supply of electricity, including potential impacts to public safety, first responders, and health and communications infrastructure.[9] MATL will include wildfire as part of its emergency operations consideration as outlined in the NERC standard *EOP-011-4 Emergency Operations*.

5.3 When wildfire is detected within 19 miles of the MATL transmission line in Montana, MATL will notify adjacent transmission systems, including NorthWestern Energy, of an impending wildfire.

[8] HB 490, § 2(2)(g), requires description of "the estimated incremental costs associated with implementing the plan, including system improvements and upgrades for a regulated utility."

[9] HB 490, § 2(2)(e), requires description of "the strategies and methods for de-energizing power lines and modifying electric facility operations to mitigate potential wildfires taking into consideration the ability of the electric facilities provider 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."

5.4 Procedures may include ongoing monitoring and eventual public safety power shut-off (PSPS) in the following circumstances:

i. Imminent wildfire risk when winds exceed 30 miles per hour, humidity is less than 30%, extreme wildfire risk exists with 19 miles of facilities, and wildfire index is greater than 30; and/or
ii. Extreme wildfire encroachment with wildfire observed (and confirmed by a source deemed credible by MATL operations staff) within 6 miles of the transmission facility, with wind gusts of greater than 45 miles per hour.

5.5 MATL operations staff shall ensure that it will maintain the methods used to restore its transmission system in the event the system is de-energized for the prevention of a wildfire.[10] These methods will include the restoration of the transmission system once the conditions that triggered the de-energization no longer exist through the implementation of MATL operating procedures. Physical inspection of the affected site may be required prior to re-energization of the transmission system.

6. PUBLIC OUTREACH

6.1 MATL management shall ensure that it will conduct an annual review of operating procedures and may include community outreach and public awareness efforts[11] with critical stakeholders including adjacent transmission owners/operators, balancing authorities, and generation operators before and during State declared wildfire seasons through the implementation of MATL operating procedure as updated from time-to-time.

6.2 Public engagement will primarily be with connected facility owners such as transmission and generation operators including Northwestern Energy, Power Watch, Glacier Wind, and Rim Rock Wind. MATL will also host town hall or other public engagement sessions with communities where it operates.

7. STATE AND LOCAL WILDFIRE PROTECTION PLANS

[10] HB 490, § 2(2)(f), requires description of "the methods the electric facilities provider intends to use to restore its electrical system in the event systems are de-energized for the prevention of a wildfire."

[11] HB 490, § 2(2)(h), requires description of "community outreach and public awareness efforts before and during a wildfire season."

7.1 MATL management shall ensure that it will consider potential participation, if applicable, with state or local wildland fire protection plans[12] in the implementation of wildfire operating procedures including event specific coordination with Montana Department of Natural Resources and Conservation after detection of a potential encroachment event. All real-time assessments and actions will be coordinated through the MATL control center.

7.2 MATL does not operate its wildfire mitigation activities in isolation. It collaborates with a range of state and local wildfire protection agencies, including the Montana Department of Natural Resources and Conservation, United States Forest Service, Bureau of Land Management, Disaster and Emergency Services (state and local), and local fire departments across northern Montana. Engagement occurs through multiple channels, participation in agency meetings, town halls, conference calls, and other collaborative forums, as well as participation in Community Wildfire Protection Plan processes as needed to support coordination with local agencies.

7.3 Through these interactions, MATL shares relevant risk modeling outputs, PSPS trigger criteria, and vegetation management strategies where appropriate, along with methodology, assumptions, and operational concerns. This collaborative approach ensures that wildfire mitigation efforts are aligned, transparent, and coordinated with public agencies, helping to maximize effectiveness and safety across the communities where MATL operates.

[12] HB 490, § 2(2)(i), requires description of "potential participation, if applicable, with state or local wildland fire protection plans or wildfire mitigation plans."