



PENNINGTON COUNTY EMERGENCY MANAGEMENT

130 Kansas City St., Ste. 130, Rapid City, SD 57701

May 19th, 2025

Pennington County Board of Commission
130 Kansas City St., Ste 100
Rapid City, SD 57701

Rapid City Common Council
300 Sixth St.
Rapid City, SD 57701

RE: Black Hills Energy's Power Shutoff Plan

To the Honorable Members of the Pennington County Board of Commission and the Rapid City Common Council:

I am writing today to raise awareness and express concern regarding the timeline and potential consequences of Black Hills Energy's (BHE) plan to shut off power to local areas during periods of increased wildfire risk.

BHE has communicated their intentions to de-energize (shutoff) powerlines during times of low humidity and high winds to areas they deem to be at a high risk for wildfire ignitions and subsequent large fire growth. Timelines expressed by BHE officials for this plan to go into effect range from as soon as this June to a vague "sometime this summer." These power shutoffs are anticipated to last for multiple days at a time due, in part, to any de-energized powerlines needing to be inspected before restoring power. BHE has said that they will attempt to provide up to 72 hours of warning before a shutoff, and that they do not plan to shutoff power to downtown Rapid City, however there are areas within Rapid City limits that lie within risk maps developed by BHE.

I have written to you before about the very real risk our communities face from wildland urban interface (WUI) fires. I understand BHE's desire not to be the cause of a damaging and dangerous wildfire, and we applaud the long-standing and wide-ranging wildland fire risk reduction strategies that BHE currently employs. However, the cascading and potentially severe consequences of areas within Pennington County being denied commercial power for long periods of time is also very concerning. At a very basic level, Emergency Management (EM) evaluates disaster risk by estimating the probability of an event occurring and the resulting life safety, built infrastructure, environmental, and

economic consequences. It is imperative that we assess multiple threats and their resulting consequences, not just wildfire. The following are some of the potential consequences we are currently evaluating:

Life Safety

- Inability to power and charge medically necessary equipment such as oxygen concentrators, ventilators, and home dialysis machines
- Electric well pumps being unable to provide drinking water (the Rapid City Jackson Springs Treatment Facility is within BHE's identified high risk area)
- Unsafe food storage temperatures in refrigerators and freezers
- Loss of cooling – heat exposure results in more deaths per year in the US than any other weather phenomenon (more than hurricanes, floods, tornadoes, etc...)
- Increased risk of carbon monoxide exposure from portable generator use
- Back feeding of de-energized powerlines from incorrectly used portable generators

Built Infrastructure

- Loss of some telecommunications and broadband data services in affected areas
- Inability to obtain pumped fuel in the affected area
- Degradation in public alert and warning capabilities (outdoor public alert sirens, cell phones and towers, weather radios, radios, and televisions)
- Increased risk of structure fires from overloaded portable generators and inappropriately sized extension cords
- Loss of function at the Monument Health Hill City Clinic

Environmental

- Increased risk of wildfire ignition due to increased portable generator use and hot fueling
- Possible sewage release if waste treatment facilities are impacted (the Rapid City Water Reclamation Facility is within BHE's identified high risk area).

Economic

- Closure of Mount Rushmore National Memorial and other area tourist attractions
- Inability of hotels and restaurants to remain open (no power, air conditioning, refrigeration)
- Inability to operate points-of-sale (no power and potentially no data service)

These are just a few potential consequences EM is trying to understand collectively. We are very concerned that a large number of at-risk residents will be unable to shelter in place during a long-term power denial and will require some type of sheltering assistance. Large sheltering operations have significant logistical and financial implications.

Both WUI fires and long-duration power loss events have the potential to result in very serious consequences. Historically, multi-day power outages have been rare in our area, and it is usually winter weather that causes those outages. Locally, utility-caused wildfires seem to represent a small percentage of annual wildfire ignitions (we are still acquiring and analyzing available data). Using the shutoff criteria they have established, BHE has stated that power shutoffs would have occurred multiple times over the last 5 years. Hence, the probability of a long-duration power shutoff is suddenly much greater than it has been. Due to this increased probability, EM staff is working on the following:

- Ensure stakeholders (such as yourselves) are informed of both BHE's intentions and timeline as they have been communicated to us
- Stimulate stakeholder discussions centered around how our community will prepare, respond, and recover from these power shutoffs
- Enhancing our power loss public education and preparedness materials
- Continue engagement with BHE to gain further clarification of their shutoff plan
 - BHE has stated they will not be sharing the specific climatic thresholds that they will be basing their decisions on. Generally, they have referenced high winds and low humidity
- Gather and analyze data related to probabilities and consequences of these forecasted power shutdowns
 - We are having discussions with, and curating datasets from partners such as SD DOH, SD DANR, CDC's Administration for Strategic Preparedness and Response (ASPR), Monument Health, National Park Service & US Forest Service, NWS, and many others
- Networking with our EM and Dept. of Health counterparts in other states who have been navigating these shutdowns for their insights and experiences

BHE is calling this their Public Safety Power Shutoff, or PSPS plan. In visiting with Pennington County Public Safety professionals including the Pennington County Sheriff, the Rapid City Police Chief, the Rapid City Fire Chief, multiple chiefs from other fire departments across Pennington County, and multiple members of the Pennington County Local Emergency Planning Committee we are all unified in our opinion that the current timeline for the possible implementation of this shutoff plan is not in the best interest of public safety.

This letter has been shared with BHE and we stand ready to facilitate meetings between you and BHE representatives, if desired. EM certainly has more questions than answers, but I feel it's essential for everyone to be on the same page and openly discussing how these power shutoffs may affect local government and what is truly in the best interest of the public's health and safety in Pennington County.

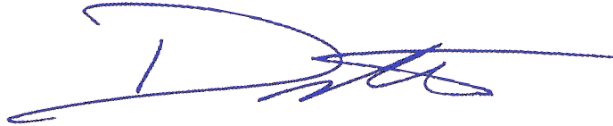
On behalf of: Brian Mueller, Pennington County Sheriff;

Don Hedrick, Rapid City Police Chief;

Jason Culberson, Rapid City Fire Chief;

And myself

Respectfully submitted

A handwritten signature in blue ink, appearing to read 'Dustin Willett', with a long horizontal flourish extending to the right.

Dustin Willett, Director

Rapid City / Pennington County Emergency Management

P.S. Black Hills Energy was provided an advanced copy of this letter and has written a letter in response with additional information. I have included that response below.

(Encl.) Black Hills Energy Wildfire Letter



May 22, 2025

Pennington County Board of Commission
130 Kansas City St., Ste 100
Rapid City, SD 57701

Dear Honorable Members of the Pennington County Board of Commissioners and the Rapid City Common Council:

Black Hills Energy has met with Pennington County Emergency Management and other emergency response agencies throughout the Black Hills Energy service territory, through individual meetings and workshops to seek their collaboration, partnership and input in the development of a Black Hills Energy Public Safety Power Shutoff program ("PSPS"). Once finalized, the PSPS will be one component of Black Hills Energy's overall Wildfire Mitigation program. Pennington County Emergency Management recently notified Black Hills Energy that it would be sending a letter outlining various concerns to the Commissioners and Council. Black Hills Energy appreciates the concerns of Emergency Management and the opportunity to provide additional information.

We understand our community partners' feedback about the potential impacts of power shutoffs. It is in light of these potential impacts that we originally reached out to these key community agencies and believe it is important to continue discussions and collaboration as we finalize our PSPS program. We appreciate your thoughtful engagement and the critical role you play in safeguarding the health and safety of our communities.

At Black Hills Energy, the safety of our customers, employees, and communities is our highest priority. As recognized by our Emergency Management professionals, wildfire presents a very real risk to our community. Black Hills Energy believes that a Public Safety Power Shutoff program is a necessary and critical tool for wildfire prevention and mitigation, particularly for utilities with high fire risk areas. Peer utilities are currently implementing and executing similar programs.

Our goal is to have a PSPS structure in place by mid-summer, ready to implement if necessary to protect public safety and mitigate wildfire risk. The Public Safety Power Shutoff program is part of our overall wildfire mitigation strategy and is a last-resort safety measure. The program involves selectively and proactively shutting off power to high-risk fire areas during extreme weather conditions until those conditions improve, with the goal of preventing electrical equipment from becoming a source of ignition.

Below are key aspects of our program and how we are addressing the issues raised:

PSPS Background

- Black Hills Energy does not intend to trigger a PSPS based only on a Red Flag Warning being issued by the National Weather Service; however, Red Flag Warnings do trigger other operational responses already in place today.
- The primary drivers utilized within the industry include a combination of wind gust speeds and low relative humidity. Black Hills Energy intends to leverage criteria similar to other electric utilities in the industry.
- We will not publicly disclose specific thresholds for activating a PSPS, however, our thresholds are being developed in consultation with an industry expert and, to the extent available, information relating to peer utilities.
- From an industry perspective, triggering wind gust speeds range from 45-55 mph. Relative humidity ranges vary more significantly.
- Based on those generalized industry indicators and multiple years of historical weather data, the combinations of wind gusts speeds and low relative humidity have occurred between 0-3 times a year in our South Dakota service territory. Black Hills Energy would emphasize that this historical comparison cannot be used to predict the future.

Communication and Coordination

- We recognize the importance of keeping our customers informed and engaged on safety issues and the development of our Public Safety Power Shutoff program.
- Black Hills Energy focuses on seasonal safety and preparedness year-round — encouraging customers to “Make a plan for safety” by offering guidance on weather readiness, assembling emergency kits, creating emergency plans, and knowing what to do before, during, and after weather-related emergencies or outages.
- To educate the public about PSPS, we are launching a comprehensive public education campaign starting in June. This campaign includes social media, email, media outreach, printed materials, community events, bill messages, etc.
- We are also developing a dedicated PSPS section on our website, which will include among other things:
 - Information about our PSPS program;
 - An expanded outage map to show PSPS-related outages; and
 - A PSPS Event page with real-time updates during an event.

- We are continuing to build our PSPS communications plan in partnership with our community partners.
- When possible, we will aim to notify our community partners and emergency responding agencies days in advance that weather conditions are approaching PSPS thresholds.

Community Preparedness

- Black Hills Energy understands that customer communication is critical and plans to communicate with customers before, during and after a potential event through phone calls, emails, text messages, social media, media outlets and our website. When possible, Black Hills Energy's goal is to provide advance notice between 24 and 48 hours before a potential shutoff.
- We are encouraging all customers to make sure their contact information is current, so they receive important safety alerts. Customers who have an email, phone number, and mobile number on file will be automatically enrolled to receive PSPS notifications.
- We will include checklists and tips on our website to help residents build emergency kits and develop backup plans.

Restoration and Safety

- Once conditions improve, our crews will inspect power lines and equipment before restoring service.
- This process may take several hours or longer depending on the extent of the event and any necessary repairs.
- We recognize that power shutoffs, even when implemented for safety, can impact our community. That's why we are continuing to actively engage with local emergency management, healthcare providers, and other stakeholders to understand those impacts. It is also why communication before, during and after an event is one of our focus areas.

We welcome the opportunity to meet with you and your teams to continue the discussion on our Wildfire Mitigation strategies, including PSPS. Additional information about our wildfire mitigation strategies can be found at blackhillsenergy.com/wildfire-safety. For questions, contact wildfiresafety@support.blackhillsenergy.com.

We are grateful for your partnership and look forward to continued collaboration as we work together to protect our communities from the growing threat of wildfires.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wes Ashton', with a stylized, flowing script.

Wes Ashton
Black Hills Energy Vice President of Operations