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State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Utah Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Béla Vastag, Utility Analyst

Date: September 9, 2020

Re: Rocky Mountain Power's Utah Wildland Fire Protection Plan - Docket No. 20-035-28

### Background

On June 1, 2020, RMP filed its first Utah Wildland Fire Protection Plan (WFPP) with the Utah Public Service Commission (PSC) in this docket. On June 22, 2020, the PSC issued a scheduling order for this docket setting due dates for comments and reply comments on RMP's Utah WFPP at August 17, 2020 and September 9, 2020, respectively. The Utah Office of Consumer Services (OCS) and the Division of Public Utilities (DPU) submitted initial comments on August 17, 2020. Per the PSC's scheduling order, the OCS submits these reply comments on RMP's Utah WFPP.

### OCS Reply Comments on RMP's Utah Wildland Fire Protection Plan

As discussed in our August 17, 2020 comments, the OCS is concerned about one component of RMP's plan – Public Safety Power Shutoffs (PSPS). Our major concerns involve whether RMP has adequately communicated with customers and whether RMP is sufficiently prepared to assist customers during a PSPS event. For example, it is likely that not all customers residing within these PSPS areas currently know that they could have their power shutoff, that not all customers will actually receive notification from RMP beforehand that a PSPS event is scheduled and that customers will not know what their options are to ride out a PSPS event. Therefore, RMP's communication with customers and being prepared to assist customers during a PSPS is paramount. The OCS submitted a discovery request (DR) OCS 1.2 to RMP seeking additional information on the effectiveness of RMP's customer communication. RMP's response to DR OCS 1.2 is included with these comments as Attachment A.

The OCS appreciates the information provided in OCS 1.2. Based on the response, RMP has already done significant and valuable work in communicating with customers to help them understand a PSPS event may occur. However, based on media reports for past California PSPS events<sup>1</sup> and postings on social media for a recent power outage initiated by RMP in a Salt Lake County neighborhood<sup>2</sup>, it is clear that many customers will not receive notification. First, in the referenced article on a Pacific Gas and Electric (PG&E) 2019 public safety power outage<sup>1</sup>, it states that approximately 3% of customers did not receive notification. As described in its WFPP, RMP has about 5,700 customers in its PSPS areas and a 3% communication failure rate would mean about 200 customers would not receive notification and be extremely unhappy due to a surprise RMP-initiated PSPS outage. Furthermore, RMP's website states "*Some customers outside of Public Safety Power Shutoff areas could be impacted by a Public Safety Power Shutoff due to the interconnected nature of the electrical grid*"<sup>3</sup>, which means that many more customers may be affected by an outage but not receive notification of a PSPS event.

Second, as the attached postings from a social media website show, there can still be confusion and frustration among affected customers even when RMP proactively attempts to notify customers of an upcoming power outage, as it did in the August 2020 event. Remarkably, the event addressed in this social media example is for a much smaller emergency power outage than proposed for a PSPS event, one that only affected about 700 customers.

In 2019 in California, when PSPS events were triggered for the first time, electric utility customers complained about how the power outages were handled. Due to the problems that occurred, the California Public Utilities Commission (CPUC) conducted investigations of some PSPS events, updated its rules on PSPS guidelines and held several public meetings in August 2020 where the three major electric utilities in California presented updates on their readiness for the 2020 PSPS season. The three presentations from these August 2020 meetings are attached as Attachment C to these comments. After these utilities had problems during the 2019 PSPS season and with public outcry over the 2019 events, the CPUC wanted assurances that the utilities were better prepared for events this year.

In terms of PSPS communication, what RMP has accomplished so far is a good first step and RMP should build upon it based on experiences in other states since good PSPS communication and preparedness are crucial to a successful outcome. The OCS recommends that RMP improve its Utah WFPP to incorporate some of the California utilities' improved practices and lessons learned from their 2019 PSPS season such as improved public outreach, communication and readiness. Some examples from California's experience include:

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<sup>1</sup> [23,000 customers didn't receive notifications from PG&E during first major power outage](#), October 28, 2019.

<sup>2</sup> See Attachment B to these comments, postings on social media website Nextdoor under subject "*Power Outage? Anyone else having this issue?*", August 20, 2020. Names of individuals and specific neighborhoods redacted for privacy.

<sup>3</sup> See: <https://www.rockymountainpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>, accessed September 9, 2020.

- Community Resource Centers (CRCs)
- PSPS drills, exercises or mock events to discover issues with utility performance and customer communication and to improve readiness
- Additional communication channels such as neighborhood social media (e.g. Nextdoor)
- PSPS Advisory Committees with local governments
- Plans for deploying temporary backup generation or batteries for vulnerable customers and for critical infrastructure
- Additional outreach with the medically vulnerable and other enhanced needs<sup>4</sup> customers

### **Recommendation**

The OCS recommends that the PSC approve RMP's Utah Wildland Fire Protection Plan contingent on:

1. RMP developing additional customer outreach and plans for customer assistance in the case of a PSPS event. The PSC should require a compliance filing in six months, by March 31, 2021 (well before next year's fire season) that updates RMP's Utah WFPP to address the PSPS preparedness issues described above. Additional stakeholder comments should be allowed at that time.
2. RMP meeting the statutory requirement of Utah Code Section 54-24-201(3)(c) demonstrating that its WFPP "balances the costs of implementing the plan with the risk of a potential wildland fire", if not provided in RMP's reply comments. This analysis should be provided and filed with the PSC as soon as possible, not in six months, as RMP has known about the requirement since the Wildland Fire Planning and Cost Recovery Act became law in March 2020.

CC: Artie Powell, Division of Public Utilities  
Jana Saba, Rocky Mountain Power  
Electronic Distribution List

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<sup>4</sup> Enhanced needs is terminology from California regulatory filings where these customers are also referred to as access and functional needs (AFN) populations or medical baseline customers. These groups may include the disabled, elderly, pregnant women, children and those with severe or chronic conditions. Although Utah does not have analogous terminology, the OCS asserts that such populations in Utah also warrant additional outreach.