



Empire Electric Association, Inc.

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October 17, 2022

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 22-025-01 – Empire Electric Association’s 2022 Wildland Fire Protection Compliance Report**

Pursuant to Utah Code § 54-24-201(4) and 54-24-202(2) and Administrative Code R746-315-3, Empire Electric Association, (“the Company”) hereby submits its 2022 Wildland Fire Protection Compliance Report.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): engineering@eea.coop
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Informal inquiries may be directed to Dalton Randolph at (970) 564-4418.

Sincerely,

Dalton Randolph
System Engineer

2022 EEA WILDLAND FIRE PROTECTION PLAN COMPLIANCE REPORT

Approved at the 14 October 2022 EEA Board of Directors Meeting

INTRODUCTION

Consistent with Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, Inc. (EEA) submitted the annual Wildland Fire Protection Plan (WFPP) compliance report to the EEA Board of Directors (Board), providing plan implementation (completed and scheduled) for high-risk areas of Utah served by EEA.

PLAN IMPLEMENTATION

1. Regulator maintenance is on a five-year cycle. The line regulator that feeds Squaw Point had maintenance completed in May 2021. Monticello Rural substation regulators are not due until March 2024 and Dove Creek substation regulators are not due until December 2023. However, the B-phase regulator at the Monticello substation was replaced 8/24/22 due to damages discovered during substation inspections.
2. The two substations that serve areas with high-risk fire danger, Monticello Rural and Dove Creek, were inspected (including substation protection devices) during the fire danger months of 2022 as follows:
 - a. Dove Creek: 4/4, 5/2, 6/2, 7/6, 8/4, 9/1
 - b. Monticello Rural: 4/4, 5/2, 6/2, 7/6, 8/4, 9/1
3. Line patrols are scheduled for every five years. All feeders from Monticello Rural substation and Feeder 3 from Dove Creek substation were patrolled May 2022.
4. Poles are tested on a 12-year cycle and the poles in the high-risk fire danger areas were last tested in 2020. They are due to be tested again in 2032. Poles may also be identified for replacement during line patrols. Two poles on Monticello Rural 3 were replaced in summer 2022.
5. Tree-trimming in the EEA right-of-way was done in the US Forest Service area of Blue Mountain Ranch in May 2021.
6. EEA WFPP Paragraph 4.a. specifies that all substation feeder protection devices in the Monticello Rural substation and one substation feeder protection device in the Dove Creek substation will be upgraded to Arc Sensing Technology recloser controls by June 2023. We have installed the SEL 651R's with high impedance fault Arc sensing technology at the Monticello Rural substation and are in test mode on the three circuits now. The potential transformers are still to be installed before June 2023. We expect to have the Dove Creek substation recloser controls installed and tested in spring 2023.

7. All the system protection devices that were determined to serve high-risk fire danger areas were put on the “summer” settings (non-reclose) as of 4/19/2022. These devices were identified in paragraph 4.b. of the EEA WFPP. The devices identified in the EEA WFPP are still currently on the summer settings.
8. Since there were no wildland fires in our Utah service territory in 2022, we did not have to implement emergency outage or electrical power restoration procedures.

WFPP CHANGES

While no changes to the WFPP are recommended at this time, there are some areas of concern that we are monitoring to see if changes would be needed in the future:

1. The system protection devices at Squaw and Bug Points experienced an increase in the number of events while in non-reclose, or the “summer” settings. Protection coordination with upstream devices will continue to be reviewed to ensure that the members served by these devices do not experience an increase in outages due to miscoordination issues.

CONCLUSION

EEA will continue to comply with the present WFPP for the next year. In 2023 EEA will be required to submit a new plan according to the statutes. EEA will continue to submit an annual compliance report as required.