

July 1, 2020

Rocky Mountain Power
c/o Chris Spencer, Managing Director, T&D Support Service
1407 W North Temple
Salt Lake City, UT 84116

Dear Mr. Spencer:

On behalf of Utah Associated Municipal Power Systems (UAMPS), I write in regard to the Public Safety Power Shutoff (PSPS) provision within Section 10 of the Rocky Mountain Power (RMP) Utah Wildland Fire Protection Plan (the “Plan”). UAMPS is grateful for the way in which you have provided initial feedback on the Plan, and fully support the work that RMP did in passing H.B. 66 – Wildland Fire Planning and Cost Recovery Amendments during the 2020 General Session.

Specifically, UAMPS seeks additional information as to how the Plan would operate to keep transmission lines energized. UAMPS acknowledges the numerous measures that RMP is taking including hardening the system thereby minimizing the need for proactive de-energization and that a proactive de-energizing is a “strategy of last resort.”¹ Further, UAMPS recognizes the instances calling for PSPS shut offs is narrow. However, some UAMPS members would benefit from having more details and understanding as to how the Plan would provide “continued supply of electricity to a community,”² especially as PSPS events appear to be focused on distribution lines, and yet could impact de-energizing transmission lines.

Public safety is a shared goal for both UAMPS and RMP and we value the strong working relationship between our organizations. As RMP continues to evaluate its own PSPS protocol as expressed in the Plan, we welcome your offer for further discussion on this issue especially involving representatives from UAMPS members that may be impacted.

Sincerely,



Mike Squires
Government Affairs Director
Utah Associated Municipal Power Systems

¹ Rocky Mountain Power, Utah Wildland Fire Protection Plan, p. 66 ¶ 2

² Utah Code Ann. § 54-24-201(2)(e)(ii) (West 2020).