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June 26, 2020

Sent Via Email

Chris Spencer  
Rocky Mountain Power  
1407 W North Temple  
Salt Lake City, UT

RE: Comments on Rocky Mountain Power's Utah Wildland Fire Protection Plan, June 26, 2020

Dear Chris:

Deseret has reviewed Rocky Mountain Power's Utah Wildland Fire Protection Plan ("Protection Plan") considering the recent Utah Code 54-24-201 and provides the following comments:

Section 10 of the Protection Plan describes RMP's approach to de-energizing power lines as a preventative measure to wildland fire risk. Were any improvements considered to this section of the Protection Plan that would reduce or limit the de-energization of power lines in favor of "...continued supply of electricity to a community" based on Utah Code 54-24-201? It does not appear that any additional consideration or "balance of the risk" was undertaken as instructed in the Utah Code 54-24-20.

In Section 2 of the Protection Plan, disabling reclosers and a "no-test" policy are discussed. On page 29, it states:

"In general, these system operating procedures are more restrictive when wildfire conditions are more elevated. The specific circumstances in which automatic reclosers are disabled and no-test applies, on both transmission and distribution lines, are fully detailed in the procedures."

It is unclear which lines and under what conditions there will be a "no-test" restriction and reclosing disabled. Because Utah Code 54-24-20 requires "a description of procedures for de-energizing power lines and disabling reclosers", it is recommended to include details regarding "no-test" and no reclose operations. Also, what "balance of the risk" to electrical service interruption was considered for "no-test" and no reclose operations?

Thank you for the opportunity to comment.

Regards,

*Phillip Solomon*

Phillip Solomon P.E.  
Vice President/Chief Engineer