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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: August 17, 2020

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

### Background

Utah Legislature House Bill (H.B.) 66, Wildland Fire Planning and Cost Recovery Act, became effective on May 12, 2020. H.B. 66 requires Rocky Mountain Power (RMP) to prepare and submit for approval a wildland fire protection plan and requires the Utah Public Service Commission (PSC) to review and approve the wildland fire protection plan.

As required by H.B. 66 (or Utah Code Title 54, Chapter 24), on June 1, 2020, RMP filed its first Utah Wildland Fire Protection Plan (WFPP) with the 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. In compliance with the PSC's schedule, the Utah Office of Consumer Services (OCS) submits these initial comments on RMP's Utah WFPP.

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

Utah Code 54-24-201(3)(c) states that the PSC shall approve a wildland fire protection plan if the plan:

- (i) is reasonable and in the public interest; and
- (ii) appropriately balances the costs of implementing the plan with the risk of a potential wildland fire.

The OCS has reviewed in detail RMP's Utah WFPP. The OCS has also reviewed comments on the WFPP which were filed on August 13, 2020 by the Utah Department of Natural Resources Division of Forestry, Fire and State Lands. In addition, the OCS attended RMP's July 13, 2020 technical conference in this docket as well as four webinars

on electric utility wildfire mitigation efforts – two in July 2020 hosted by REML (an electric utility trade association) and two in August 2020 hosted by the Western Electricity Coordination Council (WECC).

Based on this review and on additional information gained from the webinars, it appears that RMP has developed a thorough wildfire protection plan for Utah. However, the OCS desires to receive more information about one component of the plan – Public Safety Power Shutoffs (PSPS).

If a PSPS event is called, RMP would de-energize power lines as a preventative measure to counter the existence of extreme wildfire risk conditions. In its WFPP, RMP states that there are 5,700 customers within the plan's identified PSPS areas. Pages 78 and 79 of the WFPP discuss RMP's outreach and communication strategies for these 5,700 customers to prepare them for possible PSPS events. The OCS is concerned that not all customers within these PSPS areas know that they could have their power shutoff and that not all customers will actually receive timely advance notification when a PSPS event is scheduled. The OCS has submitted a discovery request (DR) to RMP seeking additional information on this issue and these DR responses are expected to be received after these comments are filed. Therefore, the OCS will address the issue of PSPS customer outreach and communication in its reply comments.

The OCS sees one additional issue with RMP's plan. As referenced above, the Wildland Fire Planning and Cost Recovery Act states that the PSC may approve an electric utility's WFPP if the plan "appropriately balances the costs of implementing the plan with the risk of a potential wildland fire." The OCS notes that it is unable to locate in RMP's Utah WFPP a demonstration that costs and risks are balanced appropriately, as required by the Utah WFPP statute. The OCS anticipates that RMP will address this issue in its reply comments.

### **Recommendation**

The OCS will provide a recommendation on RMP's Utah Wildland Fire Protection Plan in its reply comments that will be filed on September 9, 2020.

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