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September 9, 2020

***VIA ELECTRONIC FILING***

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

Attention:      Gary Widerburg  
                    Commission Administrator

**RE:              Docket No. 20-035-28**  
**Rocky Mountain Power's Utah Wildland Fire Protection Plan**  
*Reply Comments*

On June 1, 2020, Rocky Mountain Power (“Company”) filed its Wildland Fire Protection Plan (the “Plan”), consistent with provisions in the Wildland Fire Planning and Cost Recovery Act, codified at UTAH CODE § 54-24-101 *et seq...* The Public Service Commission of Utah (“Commission”) has authority under § 54-24-201(3)(c) to approve the Plan. The Commission has allowed for public comment consistent with the Scheduling Order issued in this docket. Five parties have submitted comments. On August 13, 2020 the Division of Forestry, Fire, and State Lands (“FFSL”) submitted comments. On August 17, 2020 the Division of Public Utilities (“DPU”) and the Office of Consumer Services (“OCS”) submitted comments. In addition, letters to the Company were provided by Deseret Power Electric Cooperative (“Deseret”), dated June 26, 2020, and Utah Associated Municipal Power Systems (“UAMPS”), dated July 1, 2020.

**Response to the FFSL’s Comments**

The FFSL indicated that it was involved in the process of developing the Plan and listed a number of issue-specific comments that the Company reflected in the Plan based on FFSL’s input. The FFSL indicated its acceptance of the plan and concluded that its implementation will result in fewer and less expensive wildfires.

**Response to the DPU’s Comments**

In its comments, the DPU concluded that the Plan is in compliance Utah Code § 52-24-201. Accordingly, it recommended that the Commission acknowledge the Plan.

**Response to the OCS’s Comments**

The OCS requested clarifications on two issues. First, the OCS inquired about the Company’s program for Public Safety Power Shutoff (“PSPS”) and, specifically, the notification procedures

related to PSPS. The OCS expressed concern that some customers in a PSPS area might not know that they could be subject to a PSPS and that some customers might not receive actual advance notification of a PSPS. Second, the OCS requested that the Company more fully address the question of whether the Plan “appropriately balances the costs of implementing the plan with the risk of a potential wildland fire” in accordance with Utah Code 54-24-201(3)(c).

First, with respect to PSPS, the Company has subsequently responded to data requests made by the OCS on these issues. In its responses, the Company detailed the process it went through to explain the PSPS program to potentially impacted customers, including in-person meetings with local government officials and emergency responders, customer letters, community meetings in all potential PSPS areas, and a full media campaign. The Company also highlighted the availability of information on its website, available at <https://www.rockymountainpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>, which includes a tool for customers to identify whether they are located in a PSPS area and to check the current PSPS status for that area. For convenience, the Company’s data request response is included with these reply comments as Attachment A.

Second, with respect to balancing the costs with the risks of wildfire as required by Utah Code 54-24-201(3)(c), the Company emphasizes that the totality of the Plan is relevant, in greater and lesser degrees, to the balancing of the costs of implementing the Plan against the harm of wildfire. Different sections of the Plan implicate different questions raised in a cost benefit analysis. In a cost balancing analysis exercise, Rocky Mountain Power considered how effective the mitigation programs will be in reducing the probability of ignition. In addition, we must also consider the magnitude of the harm which might be avoided by reducing the potential for an ignition.

The Company’s wildfire risk mapping effort was a critical first step to obtain information central to the Company’s cost balancing effort. Recognizing where risk is the greatest is essential in balancing the costs of specific mitigation programs to be applied in an area. The Company retained a vendor (Reax Engineering Inc.), who had deep experience in wildfire risk mapping efforts for electric utilities (because of its work in California). As explained in greater detail in Section 1.1.1 of the Plan, the best wildfire science and weather forecasting tools were applied to model where an ignition would have the highest probability to grow into a large and destructive wildfire. An impact analysis tied to population density then also led to the identification of areas where the risk to people and property was greatest.

The experts in the fire agencies have a distinct understanding of the potential severity of the harm in any wildfire event, and through interactions with these agencies the Company has developed a better understanding about how some ignitions can grow into a devastating wildfire. The Company especially appreciates the considerable input from FFSL in developing the Plan. As outlined in FFSL’s comments, FFSL’s participation led to improvements in the Plan, including in a better understand the magnitude of the wildfire risk. And the data used to prepare Section 1.3 was provided by FFSL. On a broader note, the Company has also appreciated the sharing, over the past two years, of information and resources by FFSL, the Bureau of Land Management, the National Forest Service, and other federal agencies involved in wildfire issues.

For example, the Company has been able to attend and observe the meetings of the Catastrophic Wildfire Reduction Steering Committee. Representatives of Bureau of Land Management have also met with the Company multiple times. These efforts to coordinate have improved the Company's understanding of wildfire generally, which has better informed the Company's understanding of the wildfire risk and improved its preparation of the Plan.

In terms of the anticipated effectiveness of any particular wildfire mitigation strategy in reducing the probability of an ignition, the Company has applied its knowledge of the electrical system and equipment on the electric system to assess the anticipated effectiveness of a particular mitigation strategy. This effort started with an empirical analysis of outage data (in Section 1.4), because known, identified faults on the system reflect the best known correlation with ignition probability. This data showed that equipment failure and contact from object were the two outage categories of greatest concern.

Because of the direct relationship between wind and contact from object, in juxtaposition of the widely-recognized direct relationship between wind and the spread of wildfire, the Company concluded that reducing contact from object faults is the highest priority. In a nutshell, this is why the Company is committed, through the Plan, to make significant investments in the covered conductor conversion projects. The high cost of rebuilding a line and converting to covered conductor is balanced by the high probability of reducing the extremely significant risk of catastrophic wildfire during periods of elevated wind conditions. The costs of other mitigation programs (also significant but not as great as the system hardening initiative, see Tables 1 and 2 in the Plan) are also balanced by anticipated reductions in wildfire risk, and the targeting of many strategies to the Fire High Consequence Area was done specifically as part of this balancing effort. Notably, as contemplated in Section 12, the Company's evaluation of these issues will be ongoing. As more and better information is developed through practical application of various mitigation strategies, the balancing of cost versus reducing the potential from wildfire harm will continue to be re-evaluated in subsequent iterations of the Plan.

#### Response to the Comments by Deseret and UAMPS

In their letters, both Deseret and UAMPS expressed similar concerns regarding the potential de-energization of transmission lines. Deseret further posed questions about the systems operations measures discussed in Section 2 of the Plan, specifically the potential impact of disabling reclosers and the no-test policy.

In response, the Company held two conference calls with representatives of those entities to walk through questions about how wildfire mitigation measures outlined in the Plan might impact the transmission system specifically. In summary, the Company stressed that the PSPS program described in Section 10 of the Plan does not include any radial feed transmission lines. While the Company may have to de-energize a transmission line if there is an imminent safety risk (i.e. an observed equipment failure during a patrol), the Company stressed that this process would be essentially unchanged from the process used in prior years/decades. The Company also answered detailed questions about the recloser and no-test procedures in place for transmission lines during periods of elevated wildfire risk.

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The Company appreciates the input of the parties and the Commission's consideration of the Plan under § 54-24-201(3)(c).

Sincerely,



Joelle Steward

Vice President, Regulation

CC: Service List - Docket No. 20-035-28

## **Attachment A**

August 18, 2020

OCS Data Request 1.2

## OCS Data Request 1.2

Page 67 of the Wildland Fire Protection Plan (WFPP) states that there are 5,700 RMP customers within the Plan's identified Public Safety Power Shutoff (PSPS) areas. Pages 78 and 79 of the Plan discuss RMP's outreach and communication plans for these 5,700 customers to prepare for possible PSPS events. With respect to outreach and communication with these customers:

- a. Please describe in greater detail than what is provided in the WFPP how RMP has reached out and communicated with customers in Utah's PSPS areas.
- b. What has been the most used and successful method of communicating with customers in PSPS areas? Please explain why.
- c. Does RMP believe that it is able to successfully reach 100% of the customers in the PSPS areas, i.e., that all customers can be and have been reached by at least one means? If not, please explain what the barriers have been or are. What is being done to eliminate any barriers?
- d. If a PSPS event occurs and afterwards a customer complains that it did not receive any notification, what process will RMP employ to resolve this problem in the future?
- e. Please describe in more detail than what is in the WFPP what RMP has done to identify and communicate with medically vulnerable customers in the PSPS areas.
- f. To be more prepared for a potential power shutoff, customers residing in a PSPS area should understand their situation. Does RMP believe that all customers currently residing in a Utah PSPS area know that they are in a PSPS area? If not, will more outreach be done? When a new customer moves to a PSPS area, will RMP notify them that they are now residing in a PSPS area? Please explain.

## Response to OCS Data Request 1.2

- a. Rocky Mountain Power launched a communication strategy with multiple rounds of targeted messaging to those customers with the Public Safety Power Shutoff zones beginning in June 2019. Those areas include:

Salt Lake County	Wasatch County
Millcreek City	Hideout
Cottonwood Heights	Utah County
Sandy	Iron County

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OCS Data Request 1.2

Summit County  
Park City

Cedar City  
Cedar Highlands

The effort included providing information to community leadership, elected officials, EMS personnel, customers and the public on Rocky Mountain Power wildfire mitigation planning and the PSPS measure.

Communication tactics included 12 community meetings, customer letters, and informational video and website, social media, paid ads, a press release, media interviews and public webinar. Additional details about the Customer Awareness Campaign are included as Attachment OCS 1.2.

- b. The success of a given communication tactic varies given each audience, area, demographic and the preferences of the individual customer. This is why the Company applied a comprehensive communication strategy with multiple tactics in an effort to capture all of the customers targeted.
- c. Rocky Mountain Power utilizes the contact information and preferred methods of communication provided by each individual customer. Moreover, the Company leverages social media, traditional media, web and advertising to get our messaging out regarding WFM and PSPS. This comprehensive approach provides the highest chance of reaching all customers within a PSPS area.
- d. Customer care would identify the data discrepancy that might have caused the gap in communication, correct the information and verify a customer's preferred form of communication.
- e. As part of the Company's communications campaign, medically vulnerable customers were asked to update their information with Rocky Mountain Power customer service to note their status so that they can be proactively identified should a PSPS event take place.
- f. As noted in the response 1.2.a, the company's communication strategy outlined multiple outreach methods to directly engage with the community and provided webinars during the COVID-19 pandemic. The company hosts interactive maps for the PSPS area showing current and forecasted conditions which can be found at: <https://www.rockymountainpower.net/outages-safety/wildfire-safety/public-safety-power-shutoff.html>. The company has also provided wildfire safety tips which can be found at: <https://www.rockymountainpower.net/outages-safety/wildfire-safety.html>. The company does not currently have a program to notify customers when they move

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OCS Data Request 1.2

into an area that they are in the PSPS area. The company agrees with the recommendation to look at the ability to add it to the new customer connection process.

# Wildfire Safety and Preparedness

## Customer Awareness Campaign

Rocky Mountain Power launched a communication strategy with multiple rounds of targeted messaging to those customers with the Public Safety Power Shutoff zones beginning in June 2019. Those areas include:

Salt Lake County	Wasatch County
Millcreek City	Hideout
Cottonwood Heights	Utah County
Sandy	Iron County
Summit County	Cedar City
Park City	Cedar Highlands

### Round 1 Communications – Key Community Leadership in PSPS Zones – June 2019

Provided introductory information to key community leadership about the Wildfire Mitigation Plan. This initial meeting demonstrated partnership and enabled community leader input and support.

Tactics:

- Met with key leadership and EMS representatives in the 12 PSPS communities.
  - Mayor, commissioner, or council member; City/County managers and EMS manager or leads.
- Collected and recorded feedback for internal use.

### Round 2 Communications – Expanded City/County and EMS Personnel in PSPS Zones – June/July 2019

Provided an expanded audience of community and EMS leadership the details of the WFMP, and PSPS communication process.

Tactics:

- Hosted meetings with key community agencies including police, fire, water and discussed communications, process and what to do if a PSPS happens.
- Collected and recorded feedback

### Round 2.1 Communications – Managed Accounts in PSPS Zones – June/July 2019

Provided plan details to managed/key customers to notify that they are located in a PSPS area and assisted and consulted on preparation efforts.

### **Round 3 Communication – Residential/Other Customers in PSPS Zones: July/Aug. 2019**

Provided customers with WFMP information, notified customers they live within a PSPS area, partnered with community leaders/EMS on providing critical community emergency management information.

Tactics:

- Sent out customer notification letters, invites to PSPS information sessions, posted notices with local municipal organizations
- Held information sessions in the 12 PSPS areas.
- 
- Where applicable, updated/verified PSPS impacted customers' phone numbers and text capabilities
- Provided opportunity and encouraged medically vulnerable customers to update status
- Presented in city council meetings as requested
- Other meetings with elected officials as requested

### **Round 4 Communication – Media Outreach: Aug./Sept. 2019**

Provided the media and members of the public with information regarding wildfire mitigation efforts. Introduced media to PSPS measure and online outage preparedness resources through company website.

Tactics:

- Deployed press release, social media campaign
- Responded to media inquiries and engaged in requested interviews
- Shared on internal communication channels

### **Round 5 Communication: May 2020**

Provided customers, community leaders, members of the media and the public latest information on wildfire mitigation efforts, system hardening measures related to wildfire safety, and introduce new PSPS web tools.

Tactics:

- Hosted webinar and sent out targeted invites to PSPS customers, community and EMS leaders as well as posted webinar invite on paid social media ads.
- Sent state-wide press release regarding latest WFMP and PSPS information as well as invited media to webinar
- Posted webinar on social channels for customer viewing
- Targeted bill message (English and Spanish) alerting specific customers their residence or business is in a PSPS area and directing them to PSPS web map and forecasting table, or to call customer care for additional information.

## **CERTIFICATE OF SERVICE**

Docket No. 20-035-28

I hereby certify that on September 9, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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