



## Public Service Commission

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## State of Utah

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July 20, 2021

Ms. Jana Saba  
Rocky Mountain Power  
1407 W North Temple, Suite 330  
Salt Lake City, UT 84116

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Re: *Rocky Mountain Power's 2021 Wildland Fire Cost and Compliance Report*  
Docket No. 21-035-35

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) Utah Wildland Fire Protection Plan Cost and Compliance Report ("Report") filed on June 1, 2021 pursuant to Utah Code § 54-24-201(4) and 54-24-202(2) and Utah Admin. Code R746-315-3. The Report provides an update on RMP's progress in implementing its Wildland Fire Protection Plan approved in Docket 20-035-28 ("Plan"). The PSC also reviewed the comments filed by the Division of Public Utilities (DPU), the Office of Consumer Services (OCS), and Western Resource Advocates (WRA), and reply comments filed by RMP.

DPU comments that the Report showed fewer capital and O&M expenditures than planned due to delays in line rebuild projects, and fewer than anticipated distribution line inspections and corrections, primarily due to the effects of the COVID-19 pandemic. DPU adds that RMP plans to include increased expenditures in future years as a result of those first year delays. Despite these revisions, DPU comments that RMP's projects are generally progressing according to its Plan and that DPU will continue to monitor key evaluation metrics as the benefits of RMP's initial projects begin to be realized. DPU concludes that RMP made progress in implementing the Plan and recommends that the PSC acknowledge the report as complying with relevant reporting requirements under Title 54, Chapter 24, Wildland Fire Planning and Cost Recovery Act.

WRA comments that RMP should reference climate science in developing future Wildland Fire Protection Plans to provide additional credibility to RMP's assessment of the costs, risks, and ratepayer impacts associated with wildland fire. WRA adds that, going forward,

RMP should take actions consistent with preventing further climate change in light of the increased financial burden customers risk as the likelihood of wildland fire grows.

OCS comments that the Report offers informative summaries of RMP's wildland fire risk reduction accomplishments in 2020, and provides explanations for the differences between RMP's actual incurred costs and its forecasts. OCS adds that RMP's Report shows that RMP's capital investments were under budget for 2020 and are projected to be under budget again in 2021, and requests that RMP clarify at what time it will report the balances and transactions in its deferral account tracking Plan costs. OCS further requests clarification from RMP about its planned allocation of costs for rebuilding certain portions of 138 kV transmission lines identified in the Plan.

RMP responds to OCS that it began deferring incremental differences in revenue requirement to its Wildland Fire Mitigation Balancing Account (WBA) in January of 2021, and that it will report the balance of the WBA on an annual basis in its Results of Operations Reports filed each April 30, with the first report coming in 2022. RMP further responds that wildfire-related capital projects classified as transmission assets will be included in RMP's Open Access Transmission Tariff (OATT) rate once placed into service and that any additional OATT revenues associated with wildfire expenditures will be given back to Utah customers as part of its annual energy balancing account filing. RMP adds that transmission capital projects are allocated using the appropriate factor from the 2020 Protocol, currently the System Generation (SG) factor, and that, under that allocation factor, the WBA will only include Utah's share of transmission assets.

Based on the PSC's review of the Report, the filed comments, RMP's response, and DPU's recommendation, the PSC acknowledges that RMP's filing of the Report satisfies the relevant reporting requirements of Utah Code Ann. § 54-24-201(4) and 54-24-202(2), and Utah Administrative Code R746-315-3.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

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