ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W North Temple, Suite 310
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June 1, 2022

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 22-035-28 – Rocky Mountain Power's 2022 Wildland Fire Cost and Compliance Report**

Pursuant to Utah Code § 54-24-201(4) and 54-24-202(2) and Administrative Code R746-315-3, PacifiCorp, d.b.a. Rocky Mountain Power, ("the Company") hereby submits its 2022 Wildland Fire Cost and Compliance Report.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Sincerely,

Joelle Steward
Senior Vice President, Regulation and Customer & Community Solutions

CERTIFICATE OF SERVICE

Docket No. 22-035-28

I hereby certify that on May 31, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

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ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

Utah Wildland Fire Protection Plan

Cost and Compliance Report

June 1, 2022

1 INTRODUCTION

Consistent with UTAH CODE § 54-24-201(4), § 54-24-202(2), and R746-315-3, Rocky Mountain Power ("the Company") submits this Annual Cost and Compliance Report ("Report"), which provides the following:

1. The actual capital investments and expenses incurred in calendar year 2021 to implement the Wildland Fire Protection Plan ("the Plan") approved in Docket No. 20-035-28, and an updated forecast of the capital investments and expenses for the current year 2022.
2. Details of the wildfire mitigation efforts undertaken in 2021 in compliance with the Plan as approved in Docket No. 20-035-28.
3. Changes incorporated into the Plan during the previous year and the reason for the changes in accordance with the Public Service Commission of Utah's October 13, 2020 order in Docket No. 20-035-28.

Overall, Rocky Mountain Power made progress to reduce wildfire risk, and the Company continues to evaluate and measure the effectiveness of its wildfire mitigation programs.

2 CAPITAL AND O&M EXPENDITURES, FORECASTS AND PLAN UPDATES

2.1 CAPITAL SPEND SUMMARY

In 2021, Rocky Mountain Power invested $23 million of capital spend into the Wildfire Mitigation programs described in this report and accounted for in Table 1 below.

Table 1 : Wildland Fire Protection Implementation Summary – Capital Actuals 2020-2021

Capital Mitigation Programs ($ Millions)	2021			2022		
	Actuals	Plan	Variance	Forecast	Plan	Variance
System Hardening	$12.66	$44.70	($32.04)	$61.65	$66.20	($5.85)
Advanced Protection/Control	$2.71	$3.00	($0.29)	$3.00	$1.10	$1.90
Operational Practices	$1.17	$1.00	$0.17	$0.00	$0.00	$0.00
Inspections and Corrections	$4.81	$1.50	$3.31	$4.75	$1.50	$3.25
Situational Awareness	$2.04	$0.20	$1.84	$1.50	$0.20	$1.30
Environmental	$0.05	$0.20	($0.15)	$0.40	$0.40	-
Totals	**$23.44**	**$50.60**	**($27.16)**	**$71.30**	**$69.20**	**$0.80**

In 2020, Rocky Mountain Power experienced delays resulting in an underspend of $11.5 million compared to plan. In the 2021 Compliance Report, Rocky Mountain Power revised its 2022 forecast from $50.6 million to $33.8 million, in anticipation of continues delays. In 2021, Rocky Mountain Power spent $23.44 million, which is $27.16 million less than originally planned but closer to the 2020 revised forecast of $33.8 million. Generally, this is a result of project delivery delays. Rocky Mountain Power continued to experience similar challenges in 2021, resulting in project delays and lower spend than planned. The largest contributing factors for underspend were associated with the line rebuild program, which make up the largest component of the capital investment. The line rebuild projects were originally planned similar to other distribution projects, with short lead times and moderate construction needs. However, Rocky Mountain Power has observed that these projects, when compared to other distribution projects, generally require longer lead times, depending on permitting and right-of-way requirements, as well as significant construction resources. Additionally, during the engineering design phase of the covered conductor program, multiple options and alternatives were considered, which ultimately required the development of additional engineering standards. Furthermore, Rocky Mountain Power has continued to see impacts associated with high-demand markets and limited suppliers due in part to the COVID-19 related impacts. Therefore, these project delays have significantly impacted the amount of capital invested in 2021.

To address these continued challenges moving forward, Rocky Mountain Power plans to hire a construction management partner to provide a turnkey solution and additional resource. The competitive bidding process is planned to occur in 2022. Beginning in 2023, the contractor will provide key resources in project management, project controls, project reporting, engineering, estimating, permitting, surveying, material procurement, material management, construction, and post construction inspections.

Capital spend for 2022 is anticipated to be $71.20 million, very similar to the original plan of ~$69m for the year. Rocky Mountain Power plans to continue advancing planned projects and anticipates rephasing the projects and increasing capital spend in the years 2023-2024 to make up for project delays experienced in 2020 and 2021. Rocky Mountain Power anticipates that by 2025 the project spending will align with the original plan. Table 2 provides an updated forecast for capital spend for 2023-2026.

Table 2 : Wildland Fire Protection Implementation Summary – Capital Plan for 2023-2026

Capital Mitigation Programs ($ Millions)	2023	2024	2025	2026	Totals
System Hardening	$40.35	$38.35	$19.70	$10.05	$108.45
Advanced Protection and Control	$2.00	$0.75	$0.50	$0.50	$3.75
Inspections and Corrections	$4.75	$3.00	$2.00	$1.50	$11.25
Situational Awareness	$0.50	$0.10	$0.10	$ -	$0.70

Environmental	$0.40	$0.40	$0.30	$0.30	$1.40
Totals	**$48.00**	**$42.60**	**$22.60**	**$12.35**	**$125.55**
Original 2020 Plan Estimate	$40.50	$27.70	$22.00	$12.10	$102.30
Variance	**$7.50**	**$14.90**	**$0.60**	**$0.25**	**$23.25**

The net impact of both Tables 1 and 2 is an overall $23 million increase to the plan between 2022 and 2026, which results in a $4 million increase to the overall plan from $240 million to $244 million as a result of refined estimates from the originally planned projects, project scoping and engineering, and a shift in project delivery timelines.

2.2 O&M SPEND SUMMARY

In 2021, Rocky Mountain Power spent approximately $6 million of O&M in the Wildfire Mitigation programs described in this report and accounted for in Table 1 below.

Table 3: Utah Wildland Fire Protection Implementation Summary – Distribution O&M Actuals & Forecast

Mitigation Program ($ Thousands)	2021			2022		
	Actuals	Plan	Variance	Forecast	Plan	Variance
Advanced Protection & Controls	$113.80	$200.00	($86.20)	$250.00	$200.00	$50.00
Environmental	$255.00	$433.50	($178.50)	$300.00	$433.50	($133.50)
Inspections and Corrections	$1,343.00	$1,865.00	($522.00)	$1,483.50	$1,865.00	($381.50)
Situational Awareness	$368.00	$413.70	($45.70)	$1,350.50	$413.70	$936.80
System Hardening	$62.00	$170.90	($108.90)	$0.00	$170.90	($170.90)
Vegetation management	$2,785.80	$1,320.00	$1,465.80	$2,300.00	$1,320.00	$980.00
Total Distribution O&M	$4,928.00	$4,403.00	$525.00	$5,684.00	$4,403.00	$1,281.00

Table 4 : Utah Wildland Fire Protection Implementation Summary – Transmission O&M Actuals & Forecast

Mitigation Program ($ Thousands)	2021			2022		
	Actuals	Plan	Variance	Forecast	Plan	Variance
Environmental	$0.00	$76.50	($76.50)	$0.00	$76.50	($76.50)
Inspections and Corrections	$746.90	$202.00	$544.90	$316.00	$202.00	$114.00
Situational Awareness	$8.70	$0.00	$8.70	$0.00	$0.00	$0.00

System Hardening	$147.40	$0.00	$147.40	$0.00	$0.00	$0.00
Vegetation management	$148.00	$280.00	($132.00)	$125.00	$280.00	($155.00)
Total Transmission O&M	$1,051.00	$559.00	$492.00	$441.00	$559.00	($118.00)

Table 5 : Utah Wildland Fire Protection Implementation Summary – Total O&M Actuals & Forecast

Mitigation Program ($ Thousands)	2021			2022		
	Actuals	Plan	Variance	Forecast	Plan	Variance
Advanced protection and controls	$113.80	$200.00	($86.20)	$250.00	$200.00	$50.00
Environmental	$255.00	$510.00	($255.00)	$300.00	$510.00	($210.00)
Inspections and Corrections	$2,090.00	$2,067.00	$23.00	$1,800.00	$2,067.00	($268.00)
Situational Awareness	$377.00	$414.00	($37.00)	$1,351.00	$414.00	$937.00
System Hardening	$209.00	$171.00	$38.00	$0.00	$171.00	($171.00)
Vegetation management	$2,934.00	$1,600.00	$1,334.00	$2,425.00	$1,600.00	$825.00
Total O&M	$5,978.60	$4,961.60	$1,017.00	$6,125.00	$4,961.60	$1,163.40

Distribution inspections and corrections made up the largest variance in 2021 with a variance of $522 thousand less than plan. When a condition is identified through an inspection, condition correction is planned. Depending on the type of condition and repair work required, the corrective work may fall under either the capital or operations and maintenance expenses ("O&M") accounting treatments. For example, a pole replacement would be a capital expenditure, but tightening of guy lines or replacing signage would be considered expense. Since the type of correction is unknown before the actual inspection takes place, Rocky Mountain Power uses an estimate in planning and forecasting. Therefore, the actual costs can vary from the plan based on the type of correction required.

Table 6 : Utah Wildland Fire Protection Implementation Summary – Distribution O&M Plan for 2023-2026

Mitigation Program ($ Thousands)	**2023**	**2024**	**2025**	**2026**	**Total**
Advanced protection and controls	$250	$250	$250	$250	$1,000
Environmental	$300	$300	$300	$300	$1,200

Inspections and Corrections	$1,383	$1,383	$1,393	$1,443	$5,602
Situational Awareness	$3,142	$3,286	$3,430	$3,483	$13,341
Vegetation management	$2,300	$2,300	$2,300	$2,300	$9,200
Total Distribution O&M	$7,375	$7,519	$7,673	$7,776	$30,343

Table 7 : Utah Wildland Fire Protection Implementation Summary – Transmission O&M Plan for 2023-2026

Mitigation Program ($ Thousands)	**2023**	**2024**	**2025**	**2026**	**Total**
Inspections and Corrections	$330	$580	$490	$360	$1,760
Vegetation management	$125	$125	$125	$125	$500
Total Transmission O&M	$455	$705	$615	$485	$2,260

Table 8 : Utah Wildland Fire Protection Implementation Summary – Total O&M Plan for 2023-2026

Mitigation Program ($ Thousands)	2023	2024	2025	2026	Total
Advanced protection and controls	$250	$250	$250	$250	$1,000
Environmental	$300	$300	$300	$300	$1,200
Inspections and Corrections	$1,713	$1,963	$1,883	$1,803	$7,362
Situational Awareness	$3,142	$3,286	$3,430	$3,483	$13,341
Vegetation management	$2,425	$2,425	$2,425	$2,425	$9,700
Total O&M Plan	$7,830	$8,224	$8,288	$8,261	$32,603

Over the long term, the Company is not projecting significant changes to O&M spending forecast in the Plan.

3 COMPLIANCE WITH THE PLAN

3.1 OPERATIONAL PRACTICES

3.1.1 Wildfire Training Facility

In 2020, Rocky Mountain Power constructed a comprehensive wildfire transmission and distribution training center. Wildfire mitigation programs include the installation of new technology such as covered conductor, advanced detection devices and weather stations which require new training. Therefore, the training center has space to perform training, equipment testing, and analysis which includes a pole yard. This

training yard allows for personnel to get hands-on training and practice installing equipment such as covered conductor before going out to the field and is a vital component to operations. Since the facility was built, it has housed training for covered conductor installation and other programs.

3.2 INSPECTION AND CORRECTION PROGRAM

3.2.1 Distribution and Transmission Facility Point Inspection and Correction

In 2021, Rocky Mountain Power continued inspections processes which included the inspection of all poles inside of the Fire High Consequence Area (FHCA) in accordance with Rocky Mountain Power's general inspection policies and procedures. Additionally, these facilities were inspected by four infrastructure specialists that were hired and trained specifically for the purpose of conducting inspections with a particular focus on potential wildfire risk.

Table 9 : Utah Wildland Fire Protection Implementation Summary – Conditions found in 2021

Area	Fire Risk	Condition	Correction Timeframe	Outstanding Conditions*	Corrected Conditions
FHCA	Yes	A – Imminent	Dispatch correction immediately	0	34
FHCA	Yes	A	60 days average	12	231
FHCA	Yes	B	12 months	172	479
FHCA	No	A	120 days average	5	509
FHCA	No	B	not specified	504	571
2021 FHCA				**693**	**1,824**

**Outstanding conditions as of December 31, 2021*

Currently, there are 693 total outstanding conditions identified in 2021. These conditions are scheduled to be corrected when locations can be safely accessed by line operations and are a priority.

3.2.2 Transmission Infrared Inspection

In 2020, Rocky Mountain Power implemented an enhanced infrared inspection program to provide insight into conditions that may not be visually observable through a traditional visual or detailed inspection. Infrared inspections are scheduled when peak loading is expected on the transmission lines so that they have the greatest opportunity to detect a potential "hotspot". In 2021, as part of this continued program, approximately 200 transmission line miles, located in the higher risk area of the FHCA, were inspected.

3.3 VEGETATION INSPECTION AND MANAGEMENT

Rocky Mountain Power implemented the new elements of its vegetation management program described in Section 4.2 of the 2020 Plan and performed annual vegetation inspections on all lines inside of the FHCA. While the actual overhead distribution mileage inside of the FHCA is 489, Rocky Mountain Power completes an inspection on the entire circuit of a circuit that crosses the FHCA, therefore 1,209 line miles were inspected as part of this program. Additionally, 218 miles of transmission lines in the FHCA were inspected. Vegetation contractors completed work identified through the inspections consistent with the Vegetation Management Standard Operating Procedures including the extended clearances as described in Table 13 of the plan submitted in 2020. As a result, a significant amount of clearance work was performed: with 12,595 trees pruned along the distribution circuits, and 70 trees pruned along transmission lines.

Most significantly, 1,736 trees were removed along the distribution circuits and another 206 trees removed along the transmission lines. These trees were all determined to be high risk trees and in need of removal. High risk trees can fall-in and contact a conductor, taking the conductor down. Trees were removed, either as inventory reduction or because of identification as high risk.

Another key element for the vegetation management program is the Company's pole clearing program initiated in 2020. In 2021, Rocky Mountain Power continued this program by clearing the bases of all 5,073 distribution equipment poles inside of the FHCA. Pole clearing consists of clearing all vegetation in a 10-foot radius cylinder of clear spare around the pole.

3.4 ENVIRONMENTAL PROGRAM

3.4.1 Avian Protection Plan and Wildlife Protection Plan

Rocky Mountain Power continued implementation of its pre-existing Utah Avian Protection Plan (APP) in 2021, retrofitting 2,423 poles in Utah to address avian electrocution risks. This work has the added benefits of reducing wildfire risk associated with bird or animal contacts. In addition, as part of the APP and in accordance with Company state and federal wildlife permits, the Company managed hazard nests to reduce potential fire risks.

Rocky Mountain Power also continued implementation of the incremental programs identified in its 2020 WPP. The WPP is intended to identify and mitigate areas where animal contacts with lines could pose wildfire risks. Planned line rebuilds and enhancements for wildfire protection within the FHCA will address the risk of wildfire associated with avian or animal contacts in these areas. Therefore, additional efforts are being focused on other areas where habitat and animal contacts may pose wildfire risks. Historical data was gathered for wildlife-caused outages and compared with

wildfire risk areas in GIS. Based on this analysis, locations were prioritized for surveys and retrofitting. Field surveys were conducted at 294 poles on the Morgan #11 circuit in the Ogden district, and a job was created to retrofit 257 poles. Some materials were purchased in 2021, however, supply chain delays prevented job completion in 2021. The remainder of the materials were secured in 2022 and the retrofits will be conducted in 2022. Surveys in 2021 were also conducted at 48 targeted locations in the Park City district where there have been historic avian mortalities or nests that could pose a wildfire risk. Consequently, work is planned at 37 poles and for 5 nest locations; this work is planned for 2022 after the nesting season.

3.4.2 Enhancement and Fuels Reduction Partnership Projects

During 2021, Rocky Mountain Power signed a cooperative agreement with the Utah Department of Natural Resources, Division of Wildlife Resources (UDWR) as a partnership on the Watershed Restoration Initiative (WRI) project, *Parley's Canyon Watershed Restoration Phase 2* (*WRI # 5551).* As part of this project, Rocky Mountain Power provided UDWR with $250,000 in 2021 for the completion of cut and piling of approximately 156 acres in Summit Park open space. The project is intended to reduce fire risk to communities and infrastructure, improve habitat, and increase water quality and quantity, and overlaps with FHCA.

3.5 SYSTEM HARDENING

The Plan identified five primary categories for system hardening activities. The line rebuild projects are particularly central to Rocky Mountain Power's mitigation efforts, as reflected in the cost of those projects.

3.5.1 Line Rebuild Program

The increased risk of wildland fires in western states prompted Rocky Mountain Power to focus standards development on tools and materials better suited for mitigating wildfire risk.

For decades, the dominant distribution overhead conductor used by U.S. utilities, including Rocky Mountain Power, has been bare wire. Covered conductors are useful in preventing arcing on a distribution line that can be caused by trees, animals, balloons, or any other kind of foreign objects that can contact powerlines. This results in both a prevention of ignition sources for fires and an improved reliability of the distribution line.

In 2020, Rocky Mountain Power completed a re-build project of an 8-mile section of the 138 kV transmission line from Snyderville Junction to Silver Creek. In 2021, 14.6 miles of the re-build project were completed on the distribution circuits over four separate projects. The re-builds were completed on the Castro 12, New Harmony 11,

Columbia 11, and Mountain Dell 11 lines. Various other projects are at different stages in permitting, design or construction, with 2022 and 2023 installation dates currently projected. Rocky Mountain Power plans to rebuild approximately 82-line miles in 2022.

Due to the complexity of most of the line rebuild projects, the environmental permitting process, limited construction season and current demand of materials, most line rebuilds will span two or more years. 2020 served as a major planning and project origination year, while much of the engineering design work occurred in 2021, that will support installation in 2022 and beyond.

3.5.2 Pole Replacement Program

In 2021, 173 distribution poles within the FHCA were selected to be replaced. The poles selected were within the FHCA and had been installed for more than 45 years. The replacement of the poles reinforces the line segment and reduces the risk of a structural failure in a wildfire event. These pole replacements are in addition to other pole replacement initiatives and poles replaced through the line rebuild program.

3.5.3 Fire Mesh Wrap Installation

In 2020, Rocky Mountain Power created a new policy to provide crews guidance on the installation of fire mesh wrap. This wrap can be installed on wood poles (either transmission or distribution) to protect the poles from fire damage in the event of a wildfire. To date, the Company has continued to leverage this policy and has installed wrap on about 400 wood poles at critical locations. Moving forward, fire wrap will be installed on all wood poles within the FHCA area in conjunction with its line rebuild program.

3.5.4 Relays for Advanced System Protection Program

In 2020, Rocky Mountain Power replaced 19 distribution relays. In 2021, Rocky Mountain Power replaced 9 additional distribution line relays at substations with associated lines in the FHCA. These new relays increase performance and reliability compared to the existing relays. Additionally, these upgrades provide for increased capabilities such as more sensitive settings and elevated fire risk schemes and facilitate a system that can react quicker when a fault does occur. Rocky Mountain Power anticipates replacing all the relays with performance issues in the FHCA phased over the next few years which will be included in the 2023 WPP.

To date, Rocky Mountain Power has replaced 11 transmission relays, with an additional 6 relays planned for replacement to upgrade. Similar to distribution relays, these upgrades replace existing electromechanical relays to provide for increased capabilities such as more sensitive settings and elevated fire risk schemes and facilitate

a system that can react quicker when a fault does occur. These transmission relays also provide location information to dispatch operators allowing for quicker inspection and repair at the location of the fault. Like distribution relays, Rocky Mountain Power anticipates replacing all electromechanical relays phased over the next few years, which will be included in the 2023 WPP.

3.5.5 Non-Expulsion Fuse Installation Program

Rocky Mountain Power replaced 417 expulsion fuses in 2020 and 990 expulsion fuses in 2021 inside the FHCA with non-expulsion fuses. All 4,941 expulsion fuses in the FHCA are planned for replacement by the end of 2026. The work, which requires engineering design, is coordinated with parts of the distribution line rebuild projects.

3.6 SITUATIONAL AWARENESS PROGRAM

3.6.1 Weather Stations

In the 2021 Compliance Report, Rocky Mountain Power reported 21 weather stations completed and installed. Since then, Rocky Mountain Power has installed an additional 10 weather stations, bringing the total to 31 weather stations operational in Utah as of January 1, 2022. Weather station locations were selected to provide situational awareness and support weather forecasts of the areas of the FHCA. Additionally, Rocky Mountain Power has obtained eight portable weather stations as of 2021, which can be quickly deployed to rapidly inform on weather situations where there may not currently be a weather station installed.

For the next phase of weather station placement, Rocky Mountain Power plans to place weather stations based on the recommendations of the internal meteorology team who generate the situational awareness reports which inform decision making. As the weather station network develops, it is continually evaluated for continual improvement.

3.6.2 Cameras

In 2021, Rocky Mountain Power installed 14 AlertWildfire cameras to provide situational awareness of the FHCA. AlertWildfire camera views can be viewed by the public at www.alertwildfire.org/utah and are available for use by fire suppression agencies, the Utah Division of Forestry, FFSL, Utah Emergency Management groups and other fire-fighting resources throughout the state of Utah. These cameras provide a live view of Rocky Mountain Power service territory, which is utilized by Advanced Weather Forecasting software such as Technosylva, which is described further in Section 3.6.3 below.

3.6.3 Advanced Weather Forecasting, Analytics, and Situational Awareness

Rocky Mountain Power is continually improving situational awareness capabilities to improve dynamic risk assessments and forecast accuracy and inform real time decision making. During times of elevated fire risk Rocky Mountain Power needs the capability to determine the potential impact of rapidly changing environmental situations, from the ignition of a fire to the change in a strong wind. Readily available and reliable operational tools are critical to enabling this capability. Therefore, Rocky Mountain Power is investing in data, data computing capabilities, and modeling software to support dynamic risk assessment through situational awareness and inform decision making.

In 2021, Rocky Mountain Power initiated a six-month pilot project with Technolsylva's Wildfire Analyst-Enterprise (WFA-E) software to model wildfire consequence across Utah's highest fire risk. Based on initial success, the Company is continuing to expand this pilot and invest in additional software modules and data sets. As a key input to enable this tool, Rocky Mountain Power is currently working to process and incorporate a 30-year historical record re-analysis of weather across Rocky Mountain Power's Utah service territory. Once complete, this will be a critical input for a new, Weather Research and Forecast (WRF) model that will provide twice-daily high-resolution forecasts across a 96-hour time horizon. To support the computational demands of such a system that will need to process greater than one terabyte of data daily, the company began investing in High Performance Computing Clusters (HPCCs) in 2021, which became operational in November of 2021 and became fully redundant.

In addition to informing internal assessment and decision making, a digestible version of this data has been made available to employees, customers, and public safety partners through a public facing website. As the new data and tools become fully operational, modifications and improvement will be made to enhance customer and community awareness.

3.7 PUBLIC SAFETY POWER SHUTOFF (PSPS)

In 2021 or 2020, Rocky Mountain Power did not de-energize any power lines as part of any Public Safety Power Shutoff ("PSPS"). During 2021, the Rocky Mountain Power Emergency Coordination Center (ECC) was activated for two separate PSPS watch events. During the watch events, field employees were dispatched to take real-time wind measurements, actively patrol lines, and monitor local conditions, which field personnel communicated back to ECC.

While conditions were not elevated as to warrant a PSPS in either case, these watch events continue to be useful real-world experiences that helped the Company prepare for the 2022 wildfire season. In each watch event in 2021, the Company notified affected customers 48 hours in advance, informing them of potential de-energization. Targeted media notices and follow-up releases were sent out, and customers were notified via outbound calls, texts and/or emails based on their preference. Notification

information included updates on weather forecast conditions, criteria being monitored as part of the PSPS evaluation, actions taking place by operations personnel on the ground and restoration information. Rocky Mountain Power will employ the lessons learned in 2021 to continue effectively using this tool of last resort.

3.8 EMERGENCY MANAGEMENT AND RESPONSE

During 2021, Rocky Mountain Power was able to leverage new support from recently hired emergency management staff to further develop relationships in Iron, Salt Lake, Utah, Wasatch and Summit Counites in Utah. A Community Resource Center demonstration was conducted in Summit County, with participation from operations, regional business management and local public safety partners. Additionally, the Rocky Mountain Power ECC was activated, and personnel participated in a tabletop scenario for a Public Safety Power Shutoff affecting customers in the Wasatch Mountain State Park proactive de-energization zone.

3.9 PERFORMANCE METRICS AND MONITORING

A key metric for evaluating the effectiveness of mitigation strategies, especially as projects are completed every year, will be the outages during fire season inside of the FHCA. The below graphs provide a baseline of the last six years of outages inside the FHCA both in and out of fire season.

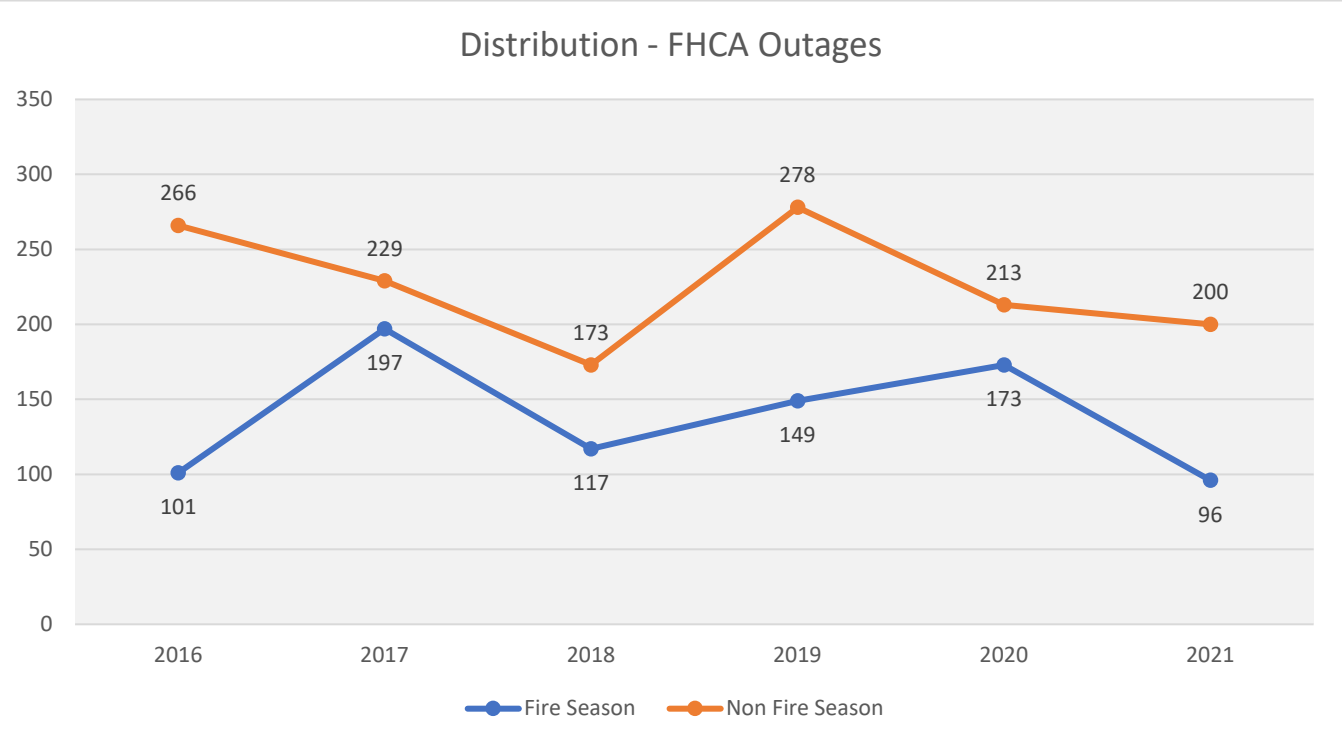

Figure 1 : Plot of Distribution Outage Data in FHCA

However, meaningful metrics and trend analysis will take time. While inspections and vegetation management have been completed inside FHCA regions, many of the line rebuilds are still underway and the benefits have not yet been realized. Additionally, these benefits are perceived to be long-term benefits. Therefore, it is expected that year on year comparisons may not be valuable, but an overall long-term trend may provide insight. For example, while outages have generally declined from 2019 to 2020, outages during fire season still show a slight increase from 2019 levels. These outages are greatly attributed to the catastrophic windstorm that Utah experienced in September. Of the 168 outages which occurred during the 2020 fire season, 66 (39%) were attributed to damages associated with this storm. Therefore, this year or year analysis does not prove valuable in determining the performance of the mitigation tactics.

4 CHANGES TO THE PLAN

As new technologies and processes are developed, Rocky Mountain Power is continuously learning and improving programs to better support wildfire mitigation. One program that Rocky Mountain Power significantly developed has been the implementation of Advanced Weather Forecasting, as described in section 3.6.3 of this report. Another key change to the plan will be the update to the Line Rebuild Program, described in section 3.5.1. Rocky Mountain Power has identified the need for additional, dedicated resources, and will be procuring the support of a Construction Management partner to meet future Line Rebuild targets.

5 COST RECOVERY

For purposes of cost recovery, the Utah Public Service Commission established a wildfire mitigation balancing account in the Company's general rate case, Docket No. 20-035-04, to track and defer the incremental revenue requirement for the capital investments and expenses to implement the approved wildland fire protection plan. The general rate case included a base level of costs in Utah rates as of January 1, 2021 and variances from the amount included in rates have been calculated and deferred on a monthly basis. The Company presented the balance of the wildfire mitigation balancing account in the results of operations report that was filed on April 29, 2022, in Docket No. 22-035-10 on page 8.12. At this time, the balance has not reached a material level for which the Company proposes regulatory treatment through rates. The Company plans to include the balance in the next general rate case, unless it reaches a material level, in which case the Company may file to request recovery prior to the next rate case.