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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Manager
Doug Wheelwright, Utility Technical Consultant Supervisor
Brenda Salter, Utility Technical Consultant Supervisor
Abdinasir Abdulle, Utility Technical Consultant

Date: June 28, 2022

Re: **Docket No. 22-035-28**, RMP's Utah Wildland Fire Protection Plan Cost and Compliance Report.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) acknowledge Rocky Mountain Power's (RMP) 2021 Utah Wildland Fire Cost and Compliance Report (Report) as complying with Utah Code §54-24-201(4) and §54-24-202(2).

Issue

Pursuant to Utah Code §54-24-201(4) and §54-24-202(2), on June 1, 2022, Rocky Mountain Power (RMP) filed its 2022 Wildland Fire Cost and Compliance Report (Report). On June 3, 2022, the Commission issued a Notice of Filing and Comment Period in which any interested person may submit comments on RMP's Report on or before Friday, July 1, 2022, and reply comments may be submitted no later than Monday, July 18, 2022. This memorandum represents the Division's comments on RMP's Report.

Division of Public Utilities

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Discussion

Pursuant to Utah Code §54-24-201(4), RMP filed its 2022 Wildland Fire Cost and Compliance Report (Report). The Report outlines the actual and forecast capital investments and expenses for the years 2021 and 2022, respectively. The Report also contains RMP's mitigation efforts and changes made to the 2021 plan.

The capital expenditure during 2021 was \$27.16 million less than planned. This was mainly due to delays resulting from the impact of Covid-19, which affected the line rebuild projects. Capital spending during 2022 is also expected to be below the original plan by \$0.8 million due to Covid-19. To make up for the project delays experienced in 2020 and 2021, RMP plans to advance the planned projects and increase capital spending in the years 2023-2024. Consequently, RMP anticipates that by 2025 the capital spending will closely align with the original plan. It is expected to be \$0.7 above plan in the years 2023 through 2026. The net impact to the plan is an increase of \$23.25 million.

Regarding the O&M expenditure, RMP spent approximately \$6 million in 2021. The distribution line inspections and corrections made up the largest variance in 2021. In its filing, Rocky Mountain Power stated that, in the longer-term, it is not anticipating any significant changes to the O&M spending forecast in the plan.

Regarding compliance, the Report provides a detailed description of the modifications or upgrades to facilities and preventative programs including the system hardening, operational practices, inspection and correction program, situational awareness program, vegetation management, and environmental program. The Division reviewed the information RMP provided regarding the performance of these programs. The Division notes that these programs are, generally, progressing according to plan. However, the Division notes that, due to the complexities associated with some of the programs and other factors associated with Covid-19, there have been some delays in some of the programs.

Regarding the effectiveness of the wildfire mitigation programs included in the plan, a key metric is the outage during the fire season inside of the Fire High Consequence Area (FHCA). Though some projects are complete, many of the distribution and transmission

rebuild projects are yet to be completed. Hence, the benefits have not yet been realized. The Division will keep monitoring this metric as more of the rebuild projects are completed.

In its Order in Docket No. 20-035-28, the Commission directed RMP “to identify any updates or changes it has incorporated into its wildland fire protection practices during the previous year and the reason for those changes.” In this filing, RMP identified two changes to the original plan; the implementation of Advanced Weather Forecasting, and an update to the Line Rebuild Program. These updates are expected to better support the wildfire mitigation.

Conclusion

Based on its review of RMP’s filing, the Division concludes that RMP made progress in implementing its wildland fire protection plan and recommends the Commission acknowledge RMP’s filing as complying with the Utah Codes.

cc: Jana Saba, Rocky Mountain Power
Michele Beck, Office of Consumer Services