Empire Electric Association, Inc.

801 N. Broadway P.O. Drawer K Cortez, CO 81321-0676 Phone (970) 565-4444
www.eea.coop

August 28, 2023

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. 23-025-01 – Empire Electric Association's 2023 Wildland Fire Protection Plan**

Pursuant to Utah Code Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, ("the Company") hereby submits its 2023 Wildland Fire Protection Plan.

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

By E-mail (preferred): engineering@eea.coop
dalton.randolph@eea.coop
josh.dellinger@eea.coop
ken.tarr@eea.coop

By regular mail: Engineering
Empire Electric Association
P.O. Box K
Cortez, CO 81321

Informal inquiries may be directed to Dalton Randolph at (970) 564-4418.

Sincerely,

Dalton Randolph

Dalton Randolph
System Engineer

Empire Electric Association, Inc.

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EEA Wildland Fire Protection Plan for its Certificated Area in the State of Utah

Revision 2

Empire Electric Association, Inc. (EEA) is a member owned electrical distribution cooperative serving over 17,000 services in southwest Colorado and southeastern Utah, namely Montezuma County and portions of Dolores and San Miguel County in the state of Colorado, and the town of Monticello and surrounding areas and Hovenweep National Monument in the state of Utah.

The EEA Board of Directors adopted the following Wildland Fire Protection Plan ("WFPP") at a duly called regular meeting held on August 11, 2023. The purpose of this WFPP is to comply with 54-24-203, Utah Code Annotated 1953 and establish processes and procedures for evaluating, mitigating, and addressing wildland fire risk to EEA's system and its service territory in the state of Utah.

1. Description of areas within EEA's service territory In Utah that are subject to heightened risk of wildland fire:
    a. Areas co-op identifies as high risk:
        i. Areas within EEA service area which the State of Utah has identified as having high risk and/or high threat as obtained through the Utah Division of Natural Resources – Wildlife Risk Assessment Portal (WRAP) found at https://wildfirerisk.utah.gov/. See Maps 1-5 attached hereto as Exhibit "A".
2. Description of inspection procedures, standards, and time frames to inspect and operate infrastructure:
    a. EEA will perform distribution system inspection and maintenance based on best management practices for the electric utility industry, currently:
        ii. Substation Inspections will be performed in accordance with EEA Maintenance Master Plan – #5 Substation Inspections, attached hereto as Exhibit "B". This plan may be updated from time to time as needed by EEA.
        iii. Circuit Breaker inspections will be performed in accordance with EEA Maintenance Master Plan – #6 Circuit Breaker Maintenance, attached hereto as Exhibit "C". This plan may be updated from time to time as needed by EEA.
        iv. Voltage regulator maintenance will be performed in accordance with EEA Maintenance Master Plan – #7 Voltage Regulator Maintenance, attached hereto as Exhibit "D". This plan may be updated from time to time as needed by EEA.
        v. Distribution system line patrol in accordance with EEA Maintenance Master Plan – #2 Line Patrol, attached hereto as Exhibit "E". This plan may be updated from time to time as needed by EEA.
        vi. Distribution system pole inspection in accordance with EEA Maintenance Master Plan – #4 Pole Testing, attached hereto as Exhibit "F". This plan may be updated from time to time as needed by EEA.

    b. EEA will follow the National Electric Safety Code and the Empire Electric Standard Operating Procedures regarding operation of infrastructure in a safe manner.

3. Description of procedures and standards used to perform vegetation management:
    a. EEA has adopted and will follow <u>EEA Maintenance Master Plan – #3 Vegetation Management,</u> attached hereto as Exhibit "G". The policy may be updated from time to time as needed by EEA.

4. Description of proposed modifications or upgrades to the facilities and prevention programs which will be implemented to reduce the risk of electric facilities initiating wildland fire:

    a. Install Schweitzer Engineering Laboratories "AST" Arc Sensing Technology recloser controls for substation reclosers on circuits into areas of heightened fire risk by 9/1/2024 (dependent upon supply chain restrictions). These controls are made to detect high-impedance faults; faults that occur when trees are touching power lines, or power lines are laying on earth, gravel, sand, and so forth. These faults will not trigger an open response from normal protection device settings. Specifically, these will be installed at substation reclosers for:

        i. Circuits MU-1 in Monticello Substation
        ii. Circuit DC-3 in Dove Creek Substation

    AST has been implemented on MU-3 in Monticello Substation.

    b. Beginning no later than two calendar weeks after a High Fire Danger warning declaration by the Moab Interagency Fire Center (https://gacc.nifc.gov/gbcc/dispatch/ut-mfc/index.php) in the "Low Elevation" or "High Elevation- South" areas and ending at least 2 calendar weeks after the Fire Danger Warning returns to Moderate or lower, switch to use of "summer settings" for line protection devices in areas of heightened Fire Threat Index, to include non-reclose for line protection devices into areas of high fire danger. Non-reclose means that upon sensing a fault, the device will de-energize the line and not reclose, thus reducing the number of times the line could be energized with a fault condition (tree limb or touching ground for example). This will be done for devices:

        i. MU1-B1, MU1-E1 & MU1-H1
        ii. MU2-D1 C-Phase
        iii. MU3-A1, MU3-B1, MU3-C1
        iv. DC3-C1, DC3-BA1

5. Description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildland fires taking into consideration:

    a. Ability to reasonably access the proposed power lines to be de-energized.

        i. For Monticello Rural circuit MU1, personnel can access line reclosers MU1-B1, MU1-E1, & MU1-H1 from paved roads, and the entire MU1 circuit from the substation.
        ii. For Monticello Rural circuit MU2, personnel can access line reclosers MU2-D1 from paved roads, and the entire MU2 circuit from the substation.
        iii. For Monticello Rural circuit MU3, personnel can access line reclosers MU3-B1 & MU3-C1 from paved roads, and the entire MU3 circuit from the substation.
        iv. For Dove Creek circuit DC3, personnel can access line reclosers DC3-B1 & DC3-BA1 from paved roads, and the entire DC3 circuit from the substation.
        v. For the Hovenweep National Monument area in circuit BD3, personnel can access recloser BD3-4 near a paved road, and the entire circuit BD3 circuit from the substation or remote via SCADA.

    b. Balance the risk of wildland fire with need for continued supply of electricity to community

        i. We recognize that providing electricity is an essentials service. No

single factor drives a Public Safety Power Shutoff (PSPS), as each situation is unique. If directed by an on-scene incident manager, we will de-energize line sections as required to meet the needs on a case-by-case basis.

c. Any potential impact of public safety, first responders, and health and communication infrastructure

i. Except in the case of immediate emergency, actions which EEA takes that may impact public safety, first responders, and health and communication infrastructure will be preceded by communications with local officials whenever possible through our Member Services Department.

ii. Once the decision to deenergize facilities has been made, EEA Member Services will coordinate with Operations to execute EEA's Member Outage Notification Procedure, attached hereto as Exhibit "H".

d. Allowing for the forgoing considerations, EEA will implement the procedures described in Section 4.b above to de-energize power lines and disable reclosing.

6. Description of the procedures for use to restore electrical system in the case of wildland fire:

a. If de-energization of a line is required by an on-scene incident manager, the line will not be reenergized until approval is given by the incident manager.

b. Qualified EEA personnel will visually inspect all deenergized powerlines and reportconditions and recommendations to EEA System Operations in accordance with EEA SOP #10 & #19, attached hereto as Exhibit "I" & "J".

i. Should the powerline need repairs Operations will commence to return powerline to serviceable condition as soon as practicable.

c. Empire System Operations to coordinate with applicable local agencies and personnel on-site to make sure all personnel and equipment are in the clear for safe re- energization.

7. Description of potential consultation, if applicable, with state or local wildland fire protection plans.

a. Input will be solicited from governmental and other associated entities for regular updates to the WFPP. This may include:

i. Bureau of Land Management
ii. City/Town
iii. County Emergency Operations
iv. Fire Departments
v. National Park Service
vi. USDA/National Forest
vii. Other Agencies as determined
viii. Public Input

b. EEA solicited input from the following entities for the 2021 WFPP. (Responding entities indicated with an asterisk *)

i. Bureau of Land Management
   1. Clark Maughan -Fire Management Officer
   2. Charles Lanoue- Fire Management

ii. Fire Departments
   1. Eastland Volunteer Fire Department
      a. Todd Calvert-Fire Chief*
   2. Monticello Fire Department

a. John Neilson - Fire Chief

iii. National Park Service – Four Corners Fire Group
1. Keith Krause-Fire Management Officer

iv. San Juan County, Utah
1. Tammy Gallegos-Emergency Manager, San Juan County*
2. Natalie Freestone-Administrative Emergency Management Staff, San Juan County UT
3. David Gallegos-County Fire Chief, San Juan County UT
4. Linda Larson-EMS Director, San Juan County UT

v. Town of Monticello, UT
1. Evan Bolt, Monticello City Manager

vi. US Forest Service
1. Patrick Seekins-Dolores Ranger District Fire Management Officer

vii. Utah Division of Natural Resources
1. Rudy Sandoval-Fire Management Officer, UT Division of Forestry, Fire & State Lands, SE Area*
2. Jason Johnson-SE Area Manager, UT Division of Forestry, Fire & State Land*

No public input was received. The EEA WFPP was also presented in the October 27, 2020, Cat Fire Meeting (hosted by Utah Division of Forestry, Fire & State Lands) to those stakeholders present. Comments were solicited; however, nothing further was received.

8. Other
a. EEA SOP – Appendix A is attached hereto as Exhibit "K" to provide definitions.