



State of 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

Brenda Salter, Assistant Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Tyler McIntosh, Utility Analyst

Date: September 26, 2023

Re: **Docket No. 23-025-01**, Empire Electric Association, Inc. Wildland Fire Protection Plan.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Empire Electric Association, Inc.'s (Empire Electric) August 28, 2023, filing as complying with Utah Code § 54-24-203(4)(b) and § 54-24-203(2).

Issue

On August 28, 2023, Empire Electric filed a copy of its annual Wildland Fire Protection Plan (WFPP). On the same date, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations. The Commission asked the Division to report back by September 27, 2023. This memorandum represents the Division's response to the Action Request.

Discussion

Utah Code § 54-24-203(4) requires electric cooperatives to (a) file with the governing authority an annual report detailing the electric cooperative's compliance with the WFPP.

The plan included exhibits and addressed 8 sections which are:

1. Description of areas within Empire Electric's service territory In Utah that are subject to heightened risk of wildland fire.
2. Description of inspection procedures, standards, and time frames to inspect and operate infrastructure.
3. Description of procedures and standards used to perform vegetation management.
4. Description of proposed modifications or upgrades to the facilities and prevention programs that will be implemented to reduce the risk of electric facilities initiating wildland fire.
5. Description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildland fires.
6. Description of the procedures for use to restore electrical systems in the case of wildland fire.
7. Description of potential consultation, if applicable, with state or local wildland fire protection plans.

The Division has reviewed the filing along with the exhibits. Based on the review, the Division feels that the plan is reasonable and justifiable. There are many steps that Empire Electric takes to help mitigate and prevent wildland fires as described in the 7 steps above. Based upon the descriptions in the exhibits and the filing, the Division feels that the company can reasonably fulfill the plan it has in place.

The plan was reviewed and approved by Empire Electric's Board of Directors at its August 11, 2023, meeting and was filed with the Commission on August 28, 2023. The Division has reviewed the filing and recommends the Commission acknowledge that Empire Electric has complied with Utah Code § 54-24-203(4)(b) and § 54-24-203(2).

Conclusion

Based on its review of the filing, the Division supports the filing and recommends the Commission acknowledge that Empire Electric has complied with the filing requirements for Utah Code § 54-24-203(4)(b) and § 54-24-203(2).

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