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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

Brenda Salter, Assistant Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Tyler McIntosh, Utility Analyst

Date: October 10, 2023

Re: **Docket No. 23-025-02**, Empire Electric Association, Inc. Wildland Fire Protection Plan Annual Compliance Report.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Empire Electric Association, Inc.'s (Empire Electric) September 15, 2023, filing as complying with Utah Code § 54-24-203(4)(b).

Issue

On September 15, 2023, Empire Electric filed a copy of its annual Wildland Fire Protection Plan (WFPP) compliance report. 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 October 16, 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;

Division of Public Utilities

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and (b) file with the Commission a copy of the annual compliance report. The report was reviewed and approved by the Empire Electric's Board of Directors on September 8, 2023, and was filed with the Commission on September 15, 2023. The Division has reviewed the filing, and the Division recommends the Commission acknowledge that Empire Electric has complied with Utah Code § 54-24-203(4)(b). The filing from the company had nine steps to a plan implementation which were:

1. Regulator maintenance is on a five-year cycle.
2. All 3 substations that serve Utah which are in Monticello Rural, Blue Door and Dove Creek were inspected throughout the 2023 year.
3. Line patrols are scheduled for every five years.
4. Substation circuit breaker maintenance occurs every three years or 70 operations, whichever occurs first.
5. Poles are tested on a 12-year cycle. Poles that are in a high-risk fire danger area were last tested in 2020 in the Monticello Rural area and 2022 in Dove Creek.
6. Tree trimming in the EEA right-of-way was done for all locations in the Monticello Rural areas in 2023.
7. All substation feeder protection devices in the Monticello Rural substation and one substation feeder protection device in the Dove Creek substation will be upgraded to Arc Sensing Technology recloser controls by June 2023.
8. All the system protection devices that were determined to serve high-risk fire danger areas were put on the "summer" settings (non-reclose) as of 7/18/23.
9. Since there were no wildland fires in our Utah service territory in 2023, we did not have to implement emergency outage or electrical power restoration procedures.¹

¹ Numbers 1-9 are from the filing that Empire Electric Filed.

The Division has reviewed the filing. Based on the review, the plan and compliance report appears reasonable and justifiable. There are many steps that Empire Electric takes to help mitigate and prevent wildland fires as described in the nine steps above.

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).

cc: Michele Beck, Office of Consumer Services
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