



SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

MARGARET W. BUSSE  
Executive Director

CHRIS PARKER  
Division Director

## 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:** November 16, 2023

**Re:** **Docket No. 23-030-02**, Moon Lake Electric Association's Wildland Fire Protection Plan.

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Moon Lake Electric Association's October 26, 2023, filing as complying with Utah Code § 54-24-203 (1-3).

## Issue

On October 26, 2023, Moon Lake Electric filed 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 November 24, 2023. This memorandum represents the Division's response to the Action Request.

## Discussion

Moon Lake Electric Association is a non-profit rural electric distribution cooperative. Utah Code § 54-24-203 (1-3) requires electric cooperatives to prepare a Wildland Fire Protection

Division of Public Utilities

Heber M. Wells Building • 160 East 300 South • P.O. Box 146751 Salt Lake City, UT 84114-6741  
[www.dpu.utah.gov](http://www.dpu.utah.gov) • telephone (801) 530-7622 • toll-free in Utah (877) 874-0904 • fax (801) 530-6512

Plan in June 2020 and every third year thereafter. The WFPP submitted by Moon Lake includes content relating to wildfire risk analysis, wildfire prevention strategies and protocols, community outreach and education, etc. The purpose of this filing was to comply with Utah code, protect the public, minimize the chance of the cooperatives power lines starting wildfires, and speed up the recovery from any wildfires that may occur. The WFPP was reviewed and approved by Moon Lake's Board of Directors on October 25, 2023, and was filed with the Commission on October 26, 2023. The Division has reviewed the filing and recommends the Commission acknowledge that Moon Lake Electric has complied with Utah Code § 54-24-203 (1-3).

The Division's review of the WFPP included a comparison of the current WFPP to the original WFPP that was filed in 2020. The current WFPP added a section that included the fire history from 2006 to 2023. The Uintah Basin Interagency Fire Center recorded 2,673 fires, for an average of 149 fires per year. These fires burned 263,905 acres, which was approx. 14,661 acres per year. The most significant drivers of these fires were drought, low level fuel moistures, and extreme weather.<sup>1</sup> The WFPP includes the following steps for implementation:<sup>2</sup>

1. Overview and Wildland Fire planning efforts for the service areas
2. Objectives of the Wildfire Mitigation Plan
3. Wildfire Risk Analysis
4. Wildfire Prevention Strategies and Protocols
5. Community Outreach and Education
6. Integration with Applicable Plans

The Company has outlined its WFPP for wildfire prevention, and the Division has reviewed the filing and determined that it contains a point-by-point discussion of the requirements of the code. Based upon the review, the Division has concluded that Moon Lake Electric's filing complies with Utah Code § 54-24-203 (1-3).

---

<sup>1</sup> Moon Lake's Wildland Fire Protection Plan, October 2023, Pages 13-14

<sup>2</sup> Moon Lake's Wildland Fire Protection Plan, October 2023, Revision: 1.0, Pages ii and iii.

## **Conclusion**

Based on its review, the Division recommends the Commission acknowledge that Moon Lake Electric has complied with the requirements for Utah Code § 54-24-203(1-3).

cc: Michele Beck, Office of Consumer Services  
Curtis Miles, Operation manager for MLEA