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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: November 16, 2023

Re: **Docket No. 23-030-03**, Moon Lake Electric Association's Wildland Fire Protection Plan Compliance Report.

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Moon Lake's October 30, 2023, filing as complying with Utah Code §54-24-203(4)(b).

Issue

On October 30, 2023, Moon Lake Electric Association, Inc. (Moon Lake) filed a copy of its annual Wildland Fire Protection Plan (WFPP) Compliance Report (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 November 29, 2023. This memorandum represents the Division's response to the Action Request.

Division of Public Utilities

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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; and (b) file with the Commission a copy of the annual compliance report. The Compliance Report was reviewed and approved by the Moon Lake Electric Association's Board of Directors at its October 25, 2023, meeting and was filed with the Commission on October 30, 2023. The Division has reviewed the filing and recommends the Commission acknowledge that Moon Lake has complied with Utah Code §54-24-203(4)(b).

The Compliance Report submitted by Moon Lake had 5 main points which are: ¹

- Plan Expenses:
 - In 2023, Moon Lake incurred costs of approximately \$301,107 to administer the WFPP. The costs include personnel, materials, equipment, and other items necessary to meet the requirements and projects of the plan.
- Completed Plan Implementation:
 - All High-risk areas have been patrolled by drone or ground inspection for possible issues. Maintenance was performed where needed.
 - Maintenance was performed on all high-risk areas as well as other distribution lines.
 - The WFPP allows crews to engage a recloser once during an outage. If there is a lockout, crews will patrol the line. In higher-risk areas or where drier conditions exist patrolling the line is required before closing reclosers.
 - Line and pole inspections have resulted in approximately 140 poles being replaced in 2023.
- Plan Implementation in High- Risk Areas
 - Hanna/Tabiona area, Farm Creek, Deep Creek, Ft. Duchesne, Whiterocks, Randlett, Flaming Gorge, and Rangely Colorado are high risk areas and are inspected regularly. Trees are trimmed or removed in these high-risk areas as needed.

¹ 2023 MLEA Wildland Fire Protection Plan Compliance Report, Pages 1 and 2.

- Changes to WFPP
 - Updated information on fire statistics was obtained from the Uintah Basin Interagency Fire Center. The high-risk areas that we are currently monitoring have not changed other than the Moon Lake area where the East Fork fire of 2020 burned vegetation and power lines. The Company will continue to monitor this area as new growth occurs.

Conclusion

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

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