

August 25, 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. 23-035-27
Rocky Mountain Power's 2023 Wildland Fire Cost and Compliance Report
RMP's Phase I Reply Comments

On June 1, 2023, Rocky Mountain Power ("Company") filed its Utah Wildland Fire Protection Plan Cost and Compliance Report (the "Report"), consistent with provisions Utah Code § 54-24-201(4) and 54-24-202(2) and Administrative Code R746-315-3. The Public Service Commission of Utah ("Commission") issued a Scheduling Order and Notice of Hearing ("Scheduling Order"). On August 11, 2023, the Division of Public Utilities ("DPU") and the Office of Consumer Services ("OCS") submitted comments addressing Sections 1-4 of the Report. Pursuant to the Scheduling Order, the Company submits its Phase I reply comments.

Summary of DPU's Comments

In its comments, the DPU concludes that Sections 1-4 of the Report comply with Utah Code § 54-24-201(4) and 54-24-202(2) and recommends that the Report be acknowledged by the Commission. The DPU summarizes the Company's mitigation efforts, providing analysis on the areas where expenditures were above the projections included in the approved Wildland Fire Protection Plan ("Plan").

Summary of OCS's Comments

The OCS concludes that the Company has expanded its efforts to mitigate wildfire risk, but raises concerns over the increased expenditures. The OCS also offers a few suggestions for areas where additional detail would be helpful. First the OCS requests the Company provide additional information on the areas of expansion, such as the advanced weather forecasting and the line rebuild program. Next, the Office questions the donations of \$250,000 to Pheasants Forever and \$45,000 to Hawk Watch International and states it plans to further evaluate these expenses in the cost recovery (Phase II) portion of this docket. The Office concludes that although it appreciates the Company's efforts, additional explanation is needed to ensure the expenditures are cost effective when compared to other options.

Rocky Mountain Power's Response

Rocky Mountain Power appreciates the review and input of the DPU and OCS regarding its Report. The Company has used the comments to inform and enhance its upcoming Wildland Fire Protection Plan that will be filed by October 1, 2023 in accordance with Utah Code § 54-24-

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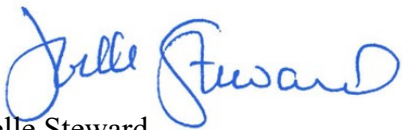
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201(3)(a)(ii). Specifically, the Company will provide information on the increased expenditures for mitigation efforts, including the advanced weather forecasting, line rebuild and environmental programs in response to the OCS.

Wildfire has long been an issue of notable public concern. Despite effective fire suppression agencies and increased suppression budgets, wildfires have grown in number, size, and intensity. The Company has been increasing its wildfire mitigation efforts in response to the growing risk of wildfire. Increased human development in the wildland-urban interface, the area where people (and their structures) are intermixed with, or located near, substantial wildland vegetation has increased the probability and exacerbated the costs of wildfire damage in terms of both harm to people and property damage. A wildfire engulfing a developed area can have significant consequences on people and property. For these reasons, Rocky Mountain Power will continue to increase its mitigation efforts to make long-term investments to reduce the risk of wildfire. Investments will be recovered if they are prudently incurred in accordance with Utah Code § 54-24-202(1). Therefore the OCS, DPU and other parties will have the opportunity to review the costs before they are included in rates.

Sincerely,



Joelle Steward

Senior Vice President, Regulation & Customer/Community Solutions

CC: Service List - Docket No. 23-035-27

CERTIFICATE OF SERVICE

Docket No. 23-035-27

I hereby certify that on August 25, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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