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August 28, 2023

Béla Vastag
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RE: UT Docket No. 23-035-27
OCS 2nd Set Data Request (1-14)

Please find enclosed Rocky Mountain Power's Responses to OCS 2nd Set Data Requests 2.1-2.14. Also provided are Attachments OCS 2.3, 2.5, and 2.11.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

_____/s/_____
Jana Saba
Manager, Regulation

Enclosures

C.c.: Madison Galt/DPU dpudatarequest@utah.gov mgalt@utah.gov (C)

OCS Data Request 2.1

In 2022, the Compliance Report states that RMP made donations of \$45,000 to Hawk Watch International and \$250,000 to Pheasants Forever. In RMP's response to OCS 1.2, these expenses were classified in the "Environmental – Wildlife protection program" category.

- (a) Please explain the purpose of these donations and how they fit into the Wildland Fire Protection Plan's wildfire mitigation efforts.
- (b) Please explain why it is appropriate for ratepayers to fund donations to these organizations.
- (c) RMP's response to OCS 1.2 shows \$45,000 charged twice in 2022 under Community Mtgs, Advertising, Membership for Hawkwatch and also \$45,000 under Environmental – Wildlife protection program – Utah: Nest Box Project. Are these two \$45,000 charges for the same item, i.e. is this expense being double counted? Please explain.

Response to OCS Data Request 2.1

- (a) In 2022, Rocky Mountain Power (RMP) made donations of \$45,000 to HawkWatch International (HWI)/cavity nest program and \$250,000 to Pheasants Forever as part of the Intermountain West Joint Venture's (IWJV) Forest habitat program. These expenditures were provided in support of the habitat enhancement efforts under the other environmental consideration section of Rocky Mountain Power's (RMP) 2020 Utah Wildland Fire Protection Plan (pages 49-50).

The Company's approved 2020 Utah Wildland Fire Protection Plan is publicly available and can be accessed by utilizing the following website link:

<http://pscdocs.utah.gov/electric/20docs/2003528/314088UtWildlandFireProtectionPlan6-1-2020.pdf>

The IWJV is a public/private collaborative that implements on-the-ground habitat work throughout the West. PF acts as a fund administrator for the IWJV. IWJV has helped RMP with identifying projects that meet habitat improvements to mitigate fire risk as described in the Utah Plan and coordinated these partnerships. The projects that are being supported with the RMP funding include:

Utah Forestry Fire and State Lands – West Hills Juniper project: This project includes thinning of juniper stands and development of fuel breaks in the foothills of Cache County. This project overlaps with RMP infrastructure and will reduce fire risk associated with dense juniper stands and create fuel

breaks between the foothill areas and adjacent communities. This has a direct benefit to RMP customers in Cache County by reducing a fire risk associated with vegetation in nearby communities.

Utah Forestry Fire and State Lands – Little Bear Forest Restoration

project: This project includes mahogany thinning (195 acres), aspen restoration (40 acres), and tree planting (20 acres). The mahogany thinning will implement lop and scatter within dense mahogany stands to remove encroaching juniper and promote healthy mahogany stands. The aspen restoration projects include mechanical cutting and removal of hazardous fuels within dead and dying subalpine fire stands in order to promote aspen regeneration. The tree planting includes planting seedlings of various resilient species to restore conifer forests. RMP funding is being used to match contributions from the Utah Watershed Restoration Initiative, Utah Forestry Fire and State Lands, United States (U.S.) Forest Service (USFS), U.S. Fish and Wildlife Service (FWS), and private landowners. Goals of this project include reducing ladder fuels that can contribute to crown fires; removing overly dense, dead or dying trees, and replacing them with healthy regenerating aspen forest; opening stands to allow safer engagement by firefighters; and reducing the risk of catastrophic fire. These projects are located adjacent to RMP infrastructure and will provide a direct benefit by reducing the risk of a forest fire impacting lines or by lines triggering fires that could span these forests.

Bear River Lands Conservancy – Bear River Watershed Forest Legacy

projects: This project is being conducted in partnership with the above Utah Forestry Fire and State Lands Little Bear Forest Restoration project. Bear River Lands Conservancy is securing a conservation easement on 15,623 acres of forested land. The partnership with Bear River Lands Conservancy will provide durability to the forest health management work being conducted by Utah Forestry Fire and State Lands, as the land can be managed in perpetuity for forest health.

- (b) The activities identified through these programs have been included and approved in the 2020 Utah Wildland Fire Protection Plan, consequently RMP is fulfilling its commitments identified in the plan. These activities support actions that prevent fire risk through removal of high risk vegetation, creation and maintenance of fire-resilient sustainable habitats, and ongoing implementation of these habitat management efforts. These efforts include lands that overlap or are adjacent to RMP's infrastructure, and management of habitats in these locations is strategic to prevent vegetation from impacting lines and vice versa. These projects implement habitat management at scales and across landownership boundaries that RMP would not be able to implement on its own. In addition to the direct benefits of reduced wildfire risk associated with utility lines in these areas, these habitat projects provide an overall benefit to Utah citizens as they are managing lands to be resilient in

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preventing wildfire risk from all potential ignition sources. They demonstrate RMP's collaborative relationship with state and federal agencies, and other partners working together to improve forest health and fire resiliency at landscape levels.

- (c) Referencing the Company's response to OCS Data Request 1.2, specifically Attachment OCS 1.2 - Line 663, includes the \$45,000 contribution to HawkWatch under "Community Mtgs, Advertising, Membership" and line 716 where the HawkWatch contribution is listed under "Environmental-Wildlife protection program" are duplicate entries. The error was noted in July 2023, corrected going forward, and an adjustment was made to the 2023 tracking report to reduce the 2023 amount by \$45,000. This was funded at \$45,000 in both 2022 and 2023 and is intended to be funded annually in subsequent years.

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OCS Data Request 2.2

RMP response to OCS 1.2 shows in 2022 \$56,000 for UT WMP – IWRMC Membership. Please explain what this is for and how it relates to wildfire mitigation efforts.

Response to OCS Data Request 2.2

The Company paid \$56,000 for its annual membership dues required by a member utility of the International Wildfire Risk Mitigation Consortium (IWRMC). As a member of the industry-sponsored collaborative, Rocky Mountain Power (RMP) benefits from the facilitated sharing of wildfire risk mitigation insights, innovations, and practices from the international collective. Working groups focused in the areas of asset management, operations and protocols, risk management, and vegetation management facilitates a system of working and networking channels that provide insight and experiences identifying leading practices between members of the global utility community. The ongoing sharing of data, information, and technology informs best practices.

OCS Data Request 2.3

RMP response to OCS 1.2 shows in 2022 \$2,470,427.87 for Technosylva Software OMAG.

- (a) Please explain how the Technosylva software aids wildfire mitigation efforts.
- (b) Please explain what this charge is for – i.e. software license, annual maintenance etc. If this charge is for multiple items, please provide some expense detail – descriptions and \$ amounts.
- (c) Please provide a copy of the software and/or software maintenance agreement.

Response to OCS Data Request 2.3

- (a) Implementation and maintenance of the full suite of Technosylva's Wildfire Analyst-Enterprise (WFA-E) software products and its Wildfire Risk Reduction Model (WRRM) solution across PacifiCorp's service territory supports operational decision making during fire season as described below:

WFA-E: FireCast performs millions of wildfire simulations daily using PacifiCorp's 96-hour Weather Research Forecast (WRF) model to identify distribution circuits and transmission lines that pose the greatest wildfire risk and downstream consequence based on current and forecast conditions. The output informs when and where system protection settings are changed and when and where a public safety power shutoff (PSPS) may be necessary. FireSim allows for real-time simulation of reported or ongoing wildfires to identify assets at risk, time of arrival, etc. to help mitigate potential damage through actions like pole wrapping. PacifiCorp WRF visualization within WFA-E also allows for more thorough analysis of weather and fire information in a single tool.

WRRM: Used to calculate the long-term Risk Spend Efficiency (RSE) associated with system hardening projects and other wildfire mitigation efforts. It is also used to identify the areas of highest risk based on climatology, asset information, vegetation, and wildfire consequence.

Under the direction of PacifiCorp's subject matter experts, TechnoSylva also used their tools and technology to develop a Fire Potential Index (FPI) customized to its complex and diverse service territory.

- (b) The charges for WFA-E include annual software licenses and maintenance. Please refer to the table below for the costs:

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Description	Cost
WFA-E, FireCast, & FireSim	\$ 1,622,750.98
Data Analytics	\$ 92,908.76
WRRM	\$ 754,768.13
TOTAL COST	\$ 2,470,427.87

(c) Please refer to Attachment OCS 2.3 which provides a copy of the purchase order.

OCS Data Request 2.4

RMP response to OCS 1.2 shows in 2022 \$176,516.84 for Patrolling costs, field response (PSPS) FHCA Dist Circuit Monitoring Cedar City.

- (a) Please explain what these costs are for – i.e. what was done.
- (b) Please provide the high level components of these expenses – descriptions and \$ amounts.
- (c) In 2022, there are many additional expenses under Patrolling costs, field response (PSPS) category for other locations. Do the Company’s explanations and cost components in parts a. and b. apply to the other locations? If not, please explain.

Response to OCS Data Request 2.4

- (a) The expense amount of \$176,516.84 was incurred to pro-actively patrol circuits in advance of fire season to determine if there were corrective issues that needed to be addressed in advance of fire season. The work for circuit patrolling is also conducted in advance of and during major weather events, particularly hot windy days.
- (b) Please refer to the information provided below:

Val. category	Overall						Plan	Actual
	Plan	Actual	Commitment	RemOrdPlan	Assigned	Available		
0100 Material Components	0	1,095	0	0	1,095	1,095-	0	1,095
0110 Internal Labor	0	202,293	0	0	202,293	202,293-	0	103,124
0120 External Contract Se	0	133,152	0	0	133,152	133,152-	0	50,319
0130 Other Employee Relat	0	12,638	0	0	12,638	12,638-	0	12,638
0220 Utilities/Oth Servic	0	9,340	0	0	9,340	9,340-	0	9,340
Result	0	358,518	0	0	358,518	358,518-	0	176,517

- (c) Yes, the explanations and cost components in subparts (a) and (b) above apply to the other locations.

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OCS Data Request 2.5

RMP response to OCS 1.2 shows in 2022 \$257,625.80 for Alert Wildfire Cameras – RMP FHCA Wildfire Camera Services. Please provide an explanation of what these expenses are for, any additional expense detail breakout and a copy of any contract/agreement related to these services.

Response to OCS Data Request 2.5

Fire High Consequence Area (FHCA) camera services include expenses for the network of 14 high definition ALERT wildfire cameras within the FHCA. The purpose is confirmation and/or detection of wildfire to facilitate quicker and better-scaled suppression responses. These expenses include the following for each of the 14 cameras:

- Camera operation
- Network operations services (maintenance, upgrades)
- Data acquisition and management
- Website development and maintenance
- Support services

Please refer to Attachment OCS 2.5 which provides a copy of the scope of work for this expense.

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OCS Data Request 2.6

RMP response to OCS 1.2 shows in 2022 \$134,228.30 for Grant Study – RMP Wildfire Grant Study. Please explain what these expenses are for.

Response to OCS Data Request 2.6

The expense amount of \$134,228.30 is supported Rocky Mountain Power's (RMP) work with a consulting firm on grant study work included reviewing the Company's current portfolio of transmission and distribution projects and providing support in developing a project portfolio that included strong contenders for United States (U.S.) Department of Energy (DOE) Grid Resilience and Investment Partnership (GRIP) funding opportunities. Please see OCS Data Request 2.14 for more detail on GRIP funding.

OCS Data Request 2.7

RMP response to OCS 1.2 shows in 2022 \$323,990.17 for Condition Corrections GRVT-FR CM REPAIRS CEDAR CITY FIRE SEASO.

- (a) Please explain what these costs are for – i.e. what was done.
- (b) Please provide the high level components of these expenses – descriptions and \$ amounts.
- (c) In 2022, there are many additional expenses under the Conditions Corrections “CM REPAIRS” category for other locations. Do the Company’s explanations and cost components in parts a. and b. apply to the other locations? If not, please explain.

Response to OCS Data Request 2.7

- (a) Facilities located in fire risk areas are inspected periodically. If conditions are found that require repair, the conditions are corrected, and the costs are tracked by operating area. The referenced \$323,990.17 expense is the total amount spent on condition corrective work in Cedar City.
- (b) Please refer to the table provided below:

Labor (Internal & Contracted)	\$230,599.79
Materials (Insulators, fasteners, etc.)	\$51,705.44
Vegetation Mgmt.	\$41,684.94
Total	\$323,990.17

- (c) Yes, the explanation and cost components provided in the Company’s responses to subpart (a) and subpart (b) above applies to other locations.

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OCS Data Request 2.8

RMP response to OCS 1.2 shows in 2022 \$285,305.61 for FHCA Inspections Dist – Utah FHCA Facility Inspections. Please provide an explanation of what these expenses are for and some additional expense detail breakout.

Response to OCS Data Request 2.8

The expense amount of \$285,305.61 were incurred costs for inspections performed on distribution facilities located in fire high risk areas (FHCA). The inspections are performed annually by PacifiCorp employees and all costs are for employee labor and associated traveling expenses.

Please refer to the table provided below:

Labor (Internal Employees)	\$268,557.96
Employee Travel Expenses (Lodging/Meals)	\$16,747.65
Total	\$285,305.61

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OCS Data Request 2.9

CS Data Request 2.9

For Weather Station Maintenance, please explain how many weather stations are being maintained, what maintenance is performed, how often and why the expenses for each station are in the \$1,000's.

Response to OCS Data Request 2.9

In 2022, 37 weather stations were maintained. Maintenance performed on the weather stations included calibration of the station sensors, updating the datalogger programming, completing the maintenance report, and replacing a failed sensor with a spare on the truck. Maintenance is performed per PacifiCorp Policy 358 (Overhead Transmission Line IR (Infrared) Inspections). Maintenance is performed annually as per PacifiCorp Policy 001 (RMP - Maintenance Intervals for Apparatus, Relays, Line Patrol/Inspections, and Communications Equipment) which aligns with manufacture recommendation. As per PacifiCorp Policy 358, this requires travel to the site by crews, bucket trucks, and detailed calibration of sensors.

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RMP response to OCS 1.2 shows in 2022 \$144,195.42 for Software ADS – ADS Software OMAG. Please explain what ADS Software is for and why the ADS software OMAG expense is needed for wildfire mitigation efforts.

Response to OCS Data Request 2.10

Atmospheric Data Solution (ADS) provides weather data for integration into PacifiCorp's Wildfire Analyst Enterprise (WFA-E) software to improve the Company's fuel-related threshold with respect to wildfire risk.

The 30-year weather data reanalysis produced by ADS includes one-hour dead fuel moisture, 10-hour dead fuel moisture, 100-hour dead fuel moisture, 1,000-hour dead fuel moisture and Energy Release Component. The data is correlated with historical fire occurrence to improve the Company's fuels-related thresholds to facilitate the implementation of PacifiCorp's wildland fire protection plan.

Evolution to a real time, mature fire modeling program that complements PacifiCorp's existing forecasting tools with support from ADS also provides additional insight into factors like fire size potential, populations impacted, and other fire behavior (rate of spread, etc.). This insight is used to better characterize real time risk and inform decision making at a localized level to facilitate a more surgical approach to making decisions, such as whether to initiate a public safety power shutoff (PSPS) event.

OCS Data Request 2.11

RMP response to OCS 1.2 shows in 2022 \$80,551.23 for FHCA Inspections Trans – FHCA IR Corona LOCAL TRANSMISSION 20.

- (a) Please explain what these costs are for – i.e. what was done.
- (b) Please provide the high level components of these expenses – descriptions and \$ amounts.
- (c) In 2022, there are many additional expenses under the FHCA Inspections Trans category for other locations. Do the Company’s explanations and cost components in parts a. and b. apply to the other locations? If not, please explain.

Response to OCS Data Request 2.11

- (a) Rocky Mountain Power (RMP) performs enhanced inspections on a select subset of the Company’s overhead transmission lines in Utah using infrared technology to identify potential hot spots, potential substandard connections, or significant equipment degradation not currently detectable through a visual inspection.

A contractor flies the overhead transmission lines using a helicopter, collect infrared (IR) data for all connections and report component overheating conditions. The inspections are performed on an annual basis during periods when the lines are near peak loading, as per PacifiCorp policy 358 (Overhead Transmission Line IR (Infrared) Inspections).

- (b) Please refer to Attachment OCS 2.11.
- (c) Yes, the explanations and cost components from the Company’s responses to subparts (a) and (b) above apply to the other expenses under the “FHCA Inspections Trans” category.

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OCS Data Request 2.12

RMP response to OCS 1.2 shows expenses under the Meteorology Dept costs category. Was RMP's Meteorology Dept newly created for its Wildland Fire Protection Plan? Where is the department located? Please explain.

Response to OCS Data Request 2.12

PacifiCorp's meteorology department was not set up specifically for the wildland fire protection, although this is a primary component of its purpose. The Company's meteorology department is split between two locations: there are two meteorologists in Salt Lake City (North Temple Office), Utah, and four meteorologists in Portland, Oregon. All six provide forecasting services to PacifiCorp's entire service territory.

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OCS Data Request 2.13

RMP response to OCS 1.2 shows in 2022 \$103,260.80 for Cell for Fault Indicators – RMP FHCA CELL for Fault Indicators. Please explain what these are for.

Response to OCS Data Request 2.13

The Communication Fault Circuit Indicators (CFCI) require a cellular connection to communicate real-time data to engineers, dispatch, and operations personnel. Each device provides fault and outage information, which is used by personnel to respond to interruptions in near real-time.

OCS Data Request 2.14

Page 4 of RMP's 2023 Compliance Report states that RMP has applied for federal grants to offset the costs of the Wildland Fire Protection Plan. Please explain how much funding is available and how much RMP expects to receive. Would the grant be one-time money or would additional funds be available in other years?

Response to OCS Data Request 2.14

Rocky Mountain Power (RMP), through its parent company PacifiCorp has applied through the United States (U.S.) Department of Energy (DOE) Grid Resilience and Investment Partnership (GRIP) funding for a smart grid grant (Topic Area 40107). The grant application was for \$101 million total, with a cost share of \$50 million. PacifiCorp is a main subrecipient in an application by the Utah Office of Energy Development (OED) for a grid innovation grant (Topic Area 40103b). PacifiCorp's request is \$276 million in total which includes a 50 percent cost share. The maximum federal funding is \$250 million. Both federal grant applications are highly competitive at a national level; the Company cannot assess how much money it expects to receive, if any. Per the U.S. DOE, this grant application cycle will begin again, with a smaller total dollar amount available, winter 2023/spring 2024, and in multiple subsequent years. The precise amount and schedule of additional funding has not been released by the U.S. DOE.