



State of Utah

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Lieutenant Governor

Public Service Commission

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Commissioner

JOHN S. HARVEY, Ph.D.
Commissioner

September 12, 2023

Ms. Jana Saba
Rocky Mountain Power
1407 W North Temple, Suite 330
Salt Lake City, UT 84116

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Re: *Rocky Mountain Power's 2023 Wildland Fire Cost and Compliance Report: Phase I - Sections 1-4; Docket No. 23-035-27*

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) Utah Wildland Fire Protection Plan Cost and Compliance Report ("Report") filed on June 1, 2023 pursuant to Utah Code Ann. §§ 54-24-201(4) and 54-24-202(2) and Utah Admin. Code R746-315-3. The Report provides an update on RMP's progress in implementing its Wildland Fire Protection Plan (WFPP) approved in Docket No. 20-035-28 ("Plan"). Additionally, the Report contains a request to approve cost recovery under Schedule No. 97, Wildfire Mitigation Balancing Account ("Schedule 97").

On June 22, 2023, the Office of Consumer Services (OCS) filed a Motion to: Deviate from R746-315-3(3)-(6) Pursuant to R746-1-109, Vacate the Existing Notice of Filing and Comment Period, Request for a Scheduling Conference and for Expedited Treatment of this Motion ("Motion"). OCS states the Report includes more extensive supporting data than prior years and a request to increase rates through Schedule 97. The PSC granted OCS's Motion on June 30, 2023.¹ Subsequently, the PSC adopted the parties' proposal to bifurcate the schedule, with Phase 1 addressing sections 1-4 of the Report and Phase 2 addressing section 5. The Division of Public Utilities (DPU) and OCS filed comments on August 11, 2023 and RMP filed reply comments on August 25, 2023.

¹ *Order Granting Motion and Notice of Scheduling Conference, Docket No. 23-035-27, June 30, 2023.*

DPU recommends the PSC acknowledge that sections 1-4 of the Report comply with Utah Code Ann. §§ 54-24-201(4) and 54-24-202(2). In making its recommendation, DPU represents that capital expenditures for 2022 were \$7.0 million more than planned and RMP's forecasted expenditure for 2023 is \$30 million over budget. DPU repeats RMP's explanation that the variation in actual to planned expenditures was due to ongoing impacts of Covid-19 and reiterates RMP's representation that the affected projects would be on schedule at the end of 2023. DPU also represents that RMP is planning to submit a new WFPP in October 2023.

OCS recommends the PSC acknowledge sections 1-4 of the Report. OCS states it appreciates RMP's efforts to mitigate wildfire risk and identified several of RMP's accomplishments including the inclusion of a new internal meteorology team, a weather station network, and advanced weather modeling capabilities. Additionally, OCS states that RMP held three tabletop exercises with local communities simulating public safety power shutoff events. OCS also requested additional details about the advanced weather forecasting, line rebuilds, and donations.²

In its reply comments, RMP states it appreciates DPU's and OCS's comments, and asserts it will use the comments to enhance and inform its updated WFPP (anticipated submission date October 1, 2023).³ Additionally, RMP commits to providing OCS information on increasing expenditures for environmental programs, line rebuilds, and weather forecasting.

Based on the PSC's review of the Report and OCS's and DPU's comments and recommendation, the PSC acknowledges that sections 1-4 of the Report (Phase I topics) satisfy the relevant reporting requirements of Utah Code Ann. §§ 54-24-201(4) and 54-24-202(2), and Utah Admin. Code R746-315-3.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#329803

² RMP made donations to Pheasants Forever (\$250,000) and Hawk Watch International (\$45,000) as part of its WFPP expenditures. These amounts, and all others associated with the proposed rate increase, will be adjudicated in Phase II of this docket.

³ RMP's Phase I Reply Comments, filed August 25, 2023.