



PublicService Commission <psc@utah.gov>

RMP Formal Complaint

1 message

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To: "psc@utah.gov" <psc@utah.gov>

Cc: David Goldsmith <dsgoldsmith@gmail.com>, David Classen <dcclassen@hotmail.com>, Tim Watcke <twatcke@gmail.com>, Laurie Hofmann <laurie.hofmann2015@gmail.com>

Public Service Commission of Utah

P.O. Box 4558

Salt Lake City, UT 84114-4558

Subject: Formal Complaint - Rocky Mountain Power Fire Mitigation Practices and Response to Underground Electrical Lines in Severe High-Risk Fire Zone

To Whom It May Concern,

We the undersigned are writing as concerned ratepayers who reside at the wildlands urban interface (WUI) overlooking City Creek Canyon, an area designated by the Utah Division of Forestry, Fire, and State Lands as one of Utah's highest-risk (extreme) fire zones. Out of deep concern for our safety and health, we are requesting prompt action regarding the risk mitigation measures proposed or currently underway by Rocky Mountain Power (RMP). We respectfully request the Public Service Commission's intervention in ensuring that RMP undergrounds its electrical lines in this high-risk zone in order to minimize the potential risk of fire hazards and weather related outages due to downed lines.

Living in a high-risk fire zone comes with significant anxiety and a constant fear for the safety of our homes and loved ones. Over the last several years, throughout the West, we have witnessed devastating wildfires, causing immense property damage and a historic number of fatalities. Amidst this grim reality, we have requested that RMP take appropriate, proactive steps to mitigate fire risks in the urban-wildlands interface abutting City Creek Canyon, and specifically, to underground its electrical lines.

Undergrounding electrical lines not only reduces the likelihood of fire ignition during severe weather conditions, such as high winds or fallen trees, but it also minimizes the chances of electrically-induced fires during routine system maintenance and emergencies. It has been widely recognized as an effective preventative measure against wildfires, particularly in high-risk areas like ours. It is the reason San Diego Gas & Electric is now undergrounding electrical wires in areas surrounding San Diego that are designated an extreme high-risk.

While we acknowledge that the undergrounding of electrical lines involves significant investment and effort, the potential benefits in terms of fire prevention and safety cannot be understated. Despite our efforts to enlist the help of RMP in addressing this issue, RMP has stated it intends to retrofit its infrastructure rather than proceed with undergrounding. As such, we implore the Public Service Commission to require that RMP take more aggressive action and put the interests of its ratepayers above those of its shareholders.

In support of this request, we ask the PSC to consider the following points:

1. **Safety of Residents:** Underground electrical lines significantly reduce the risk of fire ignition caused by external factors, leading to enhanced safety for residents and their properties. This is especially critical in areas like City Creek Canyon, which is prone to natural disasters like wildfires due to its proximity to Salt Lake City, the popularity of City Creek Canyon for recreational use, and its high winds, which have downed many of RMP's power lines in the area.
2. **Protection of Critical Infrastructure:** Undergrounding lines safeguards critical infrastructure, such as power substations and communication networks, against fire-related disruptions. This helps maintain essential services during emergency situations, making response and recovery efforts more effective.
3. **Long-Term Cost Savings:** While the upfront investment for undergrounding may be substantial, it is vital to recognize the potential cost savings in terms of reduced fire-related damages, emergency repairs, insurance claims, and public relief efforts. Furthermore, power outages due to fire incidents can cause financial losses and pose health hazards to residents who live far from the high-risk zone.
4. **Environmental Impact:** Undergrounding electrical lines translates into a reduced likelihood of fire, thereby reducing the threat of a massive fire in a pristine canyon that is proximate to the Avenues neighborhood, University of Utah, and downtown Salt Lake City. According to SLC Fire Department City Creek Canyon serves as one of the major municipal water sources for Salt Lake City, and a major fire in the canyon would impact water quality from the resulting ash.

In light of the aforementioned factors, we respectfully request that the PSC take immediate action to compel RMP to initiate a project for undergrounding electrical lines within high-risk area in the foothills of Salt Lake City. This critical step will go a long way in protecting the lives, properties, and livelihoods of the residents while fostering a safer environment for all of Salt Lake City. We have communicated with RMP and the Salt Lake City since 2019 on this project, and have attached the work orders. We have worked through the Division of Public Utilities, including mediation. We have hired a consultant to work with RMP and RMP approved contractors to find a path forward. All of this is documented in the attached.

We kindly request to be informed of any actions taken, or decisions made, in response to our complaint and formal request. After years of inconclusive or fruitless discussions and negotiations with RMP, we believe that RMP will only take action if it is compelled to do so. The evidence is conclusive: Undergrounding is the most effective way to ensure the safety and well-being of our community in the face of the significant fire risks we face.

Thank you for your attention to this matter.

Sincerely,

Ian McCubbin tel: 970-819-2842

David Goldsmith

Tim Watcke

David Classen

References:

1. <https://wrap.wildfirerisk.utah.gov/Map/Public/#whats-your-risk>
2. <https://www.sdge.com/undergrounding-overhead-powerlines>
3. <https://www.pacificorp.com/transmission/transmission-projects/foothills-wildfire-mitigation.html>