

December 9, 2019

Dear Mr. Ian McCubbin:

To accommodate your request, and give you additional time to discuss options with your neighbors, we will again delay the planned work related to the overhead power line serving the homes on Northmont Way between 469 and 569 east. We must stress, however, that the work has already been delayed multiple times at your request. We want to move forward with the planned improvements as soon as we can, precisely because of the concerns you have noted.

You have asked for a written summary of the proposed options. For the first option, let me summarize the work Rocky Mountain Power currently plans to complete. We plan to rebuild the overhead line and convert to a covered conductor design. This rebuild will include:

- Replacement of all six poles.
- Replacement of all open wire secondary with insulated parallel lay secondary.
- Replacement of all open wire primary (7.2 kV line to ground) with insulated overhead primary.
- Replacement of all expulsion based fuses and lightning arrestors with non-expulsion devices.

The current estimate for this work is \$65,068. This work will be funded in full by Rocky Mountain Power. (To address your question about soil stability, this work should not implicate any stability concerns, but we will continue to evaluate as work proceeds.)

As a second option, the line could be relocated underground, but for the reasons discussed below, the company does not plan to relocate the line underground.

*Therefore, consistent with Electric Service Regulation 12, Section 6, the property owners requesting underground placement would be responsible for all of the costs to relocate the line underground.* The estimate for Rocky Mountain Power's work relative to that job is \$199,760. This option would also require each property owner to relocate and adapt the meter base for each house to accommodate the new underground service. That work is not included in the above estimate and would have to be bid and performed by a qualified electrician. Because the company is planning to complete the work described in the first option, we are willing to contribute \$65,068 towards an underground relocation. The property owners requesting an underground installation, however, would be responsible for the difference of \$134,692.

To address your questions about risk assessment, Rocky Mountain Power has performed a wildfire risk assessment across our entire service territory, and we have identified geographic areas with the highest degree of risk. We refer to these areas as Fire High Consequence Area (FHCA). Because of the immediate proximity of your home to wildland areas, the subject line is located in the FHCA. In short, it appears that we agree the area has a relatively elevated wildfire



risk. In addition, in consideration of a number of factors, Rocky Mountain Power has prioritized this section of line for wildfire mitigation work, even over some other areas located in the FHCA.

Please be aware, however, that we respectfully disagree with the suggestion that burial of lines is an industry standard wildfire mitigation strategy. Bare overhead conductor remains industry standard for primary lines and provides for the safe and reliable delivery of essential electric power. In areas of extreme wildfire risk, many electric utilities, including Rocky Mountain Power, are incorporating a variety of wildfire mitigation strategies, depending on the unique circumstances of each location. Recognizing the increased threat of wildfire, the company is implementing a number of mitigation activities in the FHCA, including increased inspections and vegetation management. In some locations, we are also investing in new equipment specifically designed to reduce the risk of wildfire. When warranted, we may even change the design of a line. In general, we agree with the basic premise that an underground construction is the facility design with the lowest possible wildfire risk (although there is still some degree of risk). Consequently, undergrounding is a strategy that may be implemented in certain unique situations, usually when there may be some other residual benefits to an underground design that helps justify the cost. Covered conductor, however, offers comparable wildfire mitigation benefits at a considerably lower cost, and Rocky Mountain Power has an obligation to its ratepayers to implement cost-effective strategies. Due to the significant risk-reduction benefits of covered conductor, the marginal additional decrease in risk accomplished by an underground design is generally not cost effective.

Because it largely prevents the arcing of electrical current, use of insulated wire is widely regarded as a highly effective method for significantly reducing any chance of a wildfire ignition from a power line. This design is especially resilient against fire when used in conjunction with non-expulsion protection devices. In other words, the planned rebuild, as described in the first option above, is an extremely aggressive approach that we believe will virtually eliminate the risk of a fire ignition from that line. This conclusion is in line with industry best practices.

We would like to move forward with construction as soon as practical (weather and resource allowing). Unless there is a formal agreement to relocate, as contemplated under Rule 12, we will proceed and rebuild with covered conductor. We understand that deciding whether to pay for a relocation requires some coordination with your neighbors and will give you some additional time for that purpose, but please remember that we have already delayed this project for months. We now need to move forward one way or the other. Accordingly, if you were to choose to pursue the underground option and want Rocky Mountain Power to make a contribution of \$65,068 to the costs of the job, we need a firm decision and signed contract to relocate by January 15, 2020.

To address the outage issue raised in your email, it appears that the failure was with customer-owned equipment, due to the plastic anchors at the meter base. This equipment is your equipment and your responsibility. Therefore, we do not view this as relevant to the current discussion above. However, we welcome any additional information if appropriate. To the extent



that you have concerns about any historic outage issues, please keep in mind that the rebuild outlined in the first option above will generally improve reliability on a long-term basis and reduce the potential for any future outages attributable to Rocky Mountain Power equipment.

Finally, please be aware that you may see one of our crews doing some work on the subject line in the near term. There is one pole in particular need of repair, and we do not want to wait until after January 15, 2020 to complete work on it. While we would prefer to perform all work on this entire segment of line at one time, the company will bear the cost to mobilize twice. (RMP will bear the sunk cost if you and your neighbors ultimately choose to pursue a relocation.) Please take this as an indication of our good faith effort to give you more than adequate time to consider the options outlined above. Our earnest goal is to provide safe, reliable, and cost-efficient electric service to all our customers, and our wildfire mitigation efforts are aimed at delivering effective risk reduction in line with this goal.

Sincerely,

*Curt Mansfield*  
Curtis Mansfield, Vice President, T&D Operations

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