

# WILDLAND FIRE PROTECTION PLAN



**DESERET POWER**  
ELECTRIC COOPERATIVE

**DATE: March, 2024**

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**Versioning Record**

The following table details the nature, date, and primary author of major revisions to the document. The location of significant changes and updates should be noted in the description column.

Date	Version	Author	Revision Description
9/29/2023	1	JP	2023 Preliminary Draft sent to Governing Authority
3/20/2024	2	JP	Final 2023 Plan for Governing Authority Approval

# 1 Introduction/Executive Summary

The Wildland Fire Protection Plan (the “Plan” or “WFPP”) of Deseret Generation & Transmission Cooperative (“Deseret Power” or “Deseret”) is Deseret’s strategic approach to mitigating the risks posed by wildland fires in Deseret’s region. This plan outlines Deseret’s key objectives, including risk assessment, community engagement, preparedness, and resilience. This Plan aims to protect public safety and preserve the reliable delivery of electricity. While an electric utility can never fully eliminate the risk of fire, Deseret is committed to taking practical actions available to it to prevent the devastation that a wildfire could bring to the members it serves. This WFPP lays out the steps Deseret is taking to do so.

## 1.1 Purpose of the Plan

The WFPP describes Deseret Power’s strategies, programs, and procedures to mitigate the threat of electrical equipment ignited wildfires, and addresses the unique features of its service territory, such as topography, weather, infrastructure, grid configuration, and areas most prone to wildfire risks. This includes the maintenance of its transmission assets as well as the management of vegetation in the ROWs that contain these assets.

Deseret Power’s Board of Trustees (the “Governing Authority”) reviews and approves the Plan as needed, while Deseret Management is responsible for its implementation. The WFPP is a living document that will receive regular reassessment as projects and initiatives are completed. Additionally, the Plan is reviewed annually and presented to the Governing Authority with new assessments and incorporations of technology and current best practices.

## 1.2 Objectives of the WFPP

The main objective of the WFPP is to implement an actionable plan to create increased reliability and safety while minimizing the likelihood that Deseret Power assets may be the origin or contributing factor in the ignition of a wildfire. This plan was developed to be consistent with current industry best management practices and will comply with current Utah State law<sup>1</sup>, and National Electric Safety Code (NESC) regulations and guidelines. To help develop the Plan, Deseret compared emerging technologies that not only reduce the likelihood of a service interruption, but also minimize the risk of ignition from the fault causing the outage.

The secondary objective is to measure, through the annual evaluation of certain performance metrics, the effectiveness of the specific wildfire mitigation strategies. Where a particular action, program component or protocol proves unnecessary or ineffective, Deseret Power will assess whether modification or replacement is suitable. Per requirements of Utah Code Section 54-24-203, this WFPP will be reviewed and updated every 3 years, and an annual update will be provided to the Governing Authority.

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<sup>1</sup> Title 54, Chapter 24, Part 2 Wildland Fire Protection Plans

**Table 1. Plan Compliance Utah Code 54-24-203**

54-24-203 Sect. Requirement	Description	Plan Section Number
(1)	An electric cooperative shall prepare a wildland fire protection plan in accordance with the requirements of this chapter.	
(2)	A wildland fire protection plan under Subsection (1) shall include:	
(2) (a)	A description of areas within the service territory of the electric cooperative that may be subject to a heightened risk of wildland fire.	1.4, 4.2, 4.5
(2) (b)	A description of the procedures, standards, and time frames that the electric cooperative will use to inspect and operate its infrastructure.	5.2, 5.2.2, 5.2.3, 5.2.4, 5.2.5
(2) (c)	A description of the procedures and standards that the electric cooperative will use to perform vegetation management.	5.3, 5.3.1, 5.3.2
(2) (d)	A description of proposed modifications or upgrades to facilities and preventative programs that the electric cooperative will implement to reduce the risk of its electric facilities initiating a wildland fire.	5.4
(2) (e)	A description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildland fires, taking into consideration:	5.1.1, 5.1.2
(2) (e) (i)	The ability of the electric cooperative to reasonably access the proposed power line to be de-energized;	5.1.1
(2) (e) (ii)	The balance of the risk of wildland fire with the need for continued supply of electricity to a community; and	5.1.1
(2) (e) (iii)	Any potential impact to public safety, first responders, and health and communication infrastructure	5.1.1
(2) (f)	A description of the procedures the electric cooperative intends to use to restore its electrical system in the event of a wildland fire; and	6.2, 6.2.1



<b>(2) (g)</b>	A description of potential consultation, if applicable, with state or local wildland fire protection plans.	7.5.1
<b>(3) (a)</b>	An electric cooperative shall submit the wildland fire protection plan described in this section to its governing authority:	
<b>(3) (a) (i)</b>	On or before June 1, 2020; and	
<b>(3) (a) (ii)</b>	On or before October 1 of every third year after calendar year 2020.	7.5.3
<b>(3) (b)</b>	The governing authority shall:	
<b>(3) (b) (i)</b>	review the plan submitted under Subsection (3)(a); and	7.2
<b>(3) (b) (ii)</b>	consider input from:	
<b>(3) (b) (ii) (A)</b>	The Division of Forestry, Fire, and State Lands created in Section 65A-1-4;	7.5.1
<b>(3) (b) (ii) (B)</b>	Any other appropriate federal, state, or local entity that chooses to provide input; and	7.5.1
<b>(3) (b) (ii) (C)</b>	other interested persons who choose to provide input.	7.5.2
<b>(3) (c)</b>	The governing authority shall approve a wildland fire protection plan submitted under Subsection (3)(a) if the plan:	7.5.3
<b>(3) (c) (i)</b>	is reasonable and in the interest of the electric cooperative members; and	7.5.3
<b>(3) (c) (ii)</b>	appropriately balances the costs of implementing the plan with the risk of a potential wildland fire.	7.5.3
<b>(3) (d)</b>	An electric cooperative shall file with the commission a wildland fire protection plan submitted and approved under this section.	7.5.4
<b>(4)</b>	An electric cooperative shall:	
<b>(4)(a)</b>	file with its governing authority an annual report detailing the electric cooperative's compliance with the wildland fire protection plan; and	7.2
<b>(4)(b)</b>	file with the commission a copy of the annual compliance report described in Subsection (4)(a).	7.5.4

### 1.3 Utility Profile and History

Deseret Power is non-profit electric corporation that incorporated in 1978. Deseret was formed in order to generate, purchase and acquire electric energy and transmit, distribute, furnish, sell and dispose of such electric energy at wholesale only to its member systems. Deseret Power, as a regional generation and transmission cooperative headquartered in Utah, serves five-member retail cooperatives that provide service in 5 western states. Deseret’s member systems include: Bridger Valley Electric (Mountain View, Wyoming); Dixie Power (St. George, Utah); Garkane Energy (Kanab, Utah); Moon Lake Electric (Roosevelt, Utah); and Mt. Wheeler Power (Ely, Nevada). The Governing Authority of Deseret is an 11-member Board, democratically elected at the member level. Additional information on Deseret Power can be found at [www.deseretpower.com](http://www.deseretpower.com).

Deseret Power owns and operates a 500 MW Coal fired Power Plant near Vernal, Utah and jointly owns other power plants located in Utah. Blue Mountain Energy, Inc. (BME) is a subsidiary of Deseret Power located in Rio Blanco County, near Rangely Colorado. BME operates the Deserado coal mine providing fuel for the Bonanza Power Plant. BME also operates an electric 50 kV railroad from the Deserado coal mine to the Deseret Power Plant. BME owns and maintains approximately 37 miles of railroad track including the adjacent 50 kV catenary.

As a wholesale power provider and transmission owner, Deseret serves no retail or end use load at distribution class voltage levels.

Deseret's Management Team consists of the following:

David Crabtree, President and CEO  
Gregory Humphreys, VP and CFO  
Eric Olson, VP and COO  
Charles Kapp – Mine Manager  
Clay MacArthur, VP of Power Marketing  
Danny Clark, VP of Human Resources  
Jeff Peterson, VP and General Counsel  
Nathan Powell, VP Transmission  
Cami Reeder, AVP

The official mailing address of the cooperative:

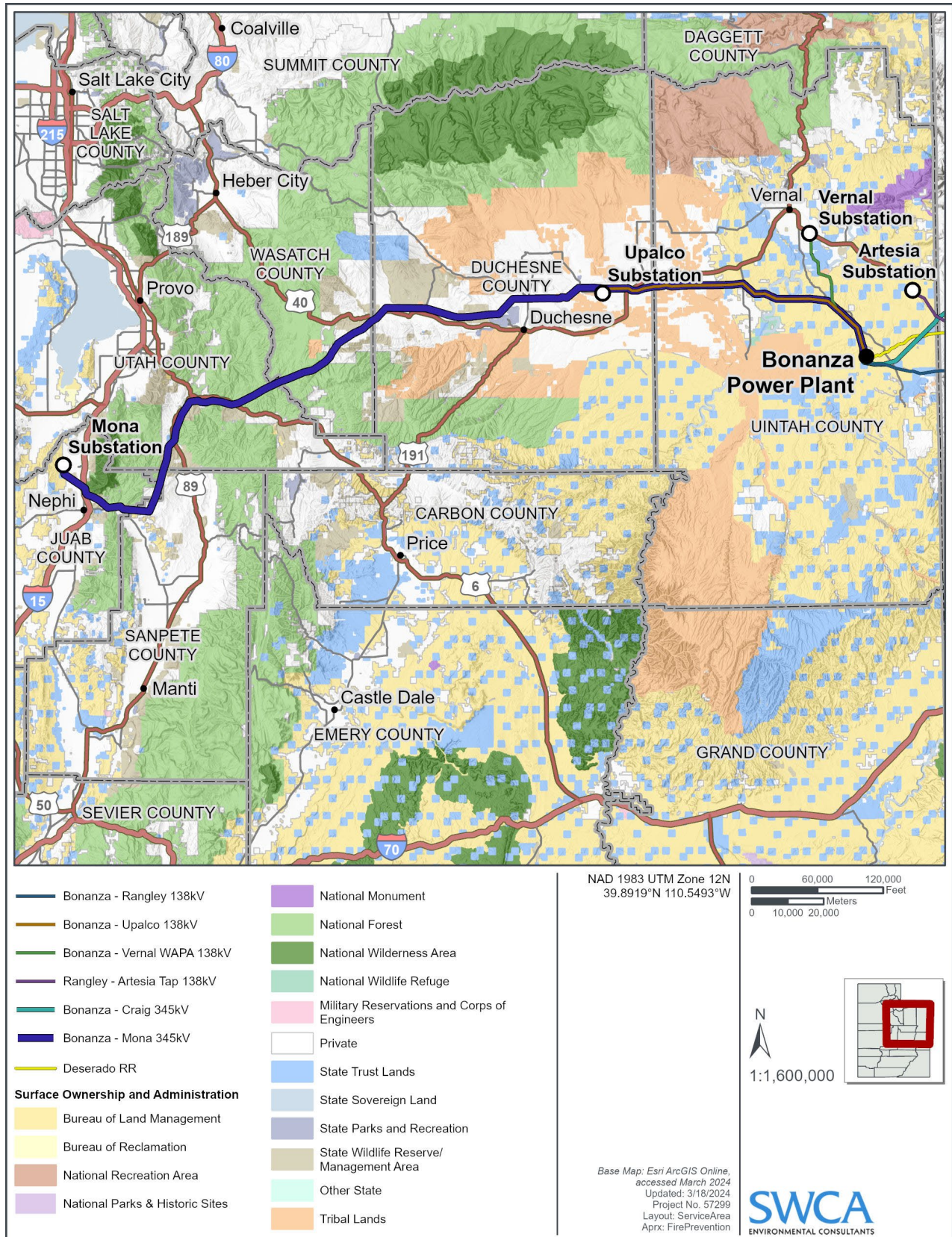
10714 S Jordan Gateway, Suite 300  
South Jordan, UT 84095

The phone number for Deseret Power is 801-619-6500

## 1.4 The Service Area

Deseret Power owns and maintains approximately 300 miles of transmission lines, three substations, and related facilities ranging from 50 kV to 345 kV. A description of each line and location and overview map can be found in Figure 1 and Section 3 of the Plan.

**Figure 1. Service Area**



## 2 Overview of Utility’s Fire Prevention Strategies

This WFPP integrates and interfaces with Deseret Power’s existing operations plans, asset management, and engineering principles, which are themselves subject to change. Future iterations of the WFPP will reflect any changes to these strategies and will incorporate new best management practices as they are developed and adopted.

Table 2 summarizes Deseret Power’s five mitigation components with associated programs and activities that support Deseret Power’s ongoing commitment to wildfire prevention and mitigation.

**Table 2. Mitigation Strategies/Activities**

<b>DESIGN AND CONSTRUCTION</b>
Covered jumpers and animal guards
Avian protection construction standards
Maintain overhead wire spacing to reduce wire to wire contact
Substation perimeter fencing for security and protection
<b>INSPECTION AND MAINTENANCE</b>
Quarterly infrared inspections of substation equipment
Unmanned Aerial Vehicle (UAV) transmission line inspections as needed (or when conditions/circumstances dictate)
Helicopter inspection program – One inspection per year with IR, one without
Wood pole intrusive inspection and testing – 10% per year, unless conditions/circumstances warrant more
Transmission vegetation right-of-way maintenance (see Vegetation Mngmt. Plan)

<b>INSPECTION AND MAINTENANCE (cont.)</b>
Annual visual transmission system line patrols and detailed inspections
<b>OPERATIONAL PRACTICES</b>
Annual review of work procedures and training for persons working in locations with elevated fire risk conditions, prior to fire season
Annual review of work with Contractor/staff safety training and orientation for vegetation management work, prior to fire season
Alternate recloser practices during elevated fire risk (see Veg MGMT plan)
Annual inspection of fire suppression equipment on worksite before fire season
Provide liaison to the Agency or Agencies Having Jurisdiction (AHJ) or the assigned Incident Management Team (IMT) during a fire event
<b>SITUATIONAL AWARENESS</b>
Weather Monitoring in the service area
Utility-owned weather stations (see Section 5.1.3)
Monitoring active fires in the service region in conjunction with the AHJ
<b>RESPONSE AND RECOVERY</b>
Coordination with AHJ
Crisis Communication Plan
Line patrols before re-energization when necessary

### 3 Utility Asset Overview

Deseret Power owns and maintains approximately 300 miles of transmission lines, three substations, and related facilities ranging from 50 kV to 345 kV. A description of each line and location is provided below, and an overview map is provided in Figure 1.

The lines and substations associated with the State of Utah are as follows:

Deseret Bonanza Substation:

- 2 - 345 kV line terminals
- 4 - 138 kV line terminals

- 1 – 69 kV line terminal
- 1 – 50 kV line terminal
- 1 – 138 kV line intertie with PacifiCorp.

Deseret Upalco Substation:

- 2 – 138 kV line terminals.
- 1 – 138 kV bus tie to adjacent PacifiCorp 138 kV substation.
- 1 – 138 kV bus tie to Moon Lake Electric 69 kV substation.

Deseret Southwest Rangely Substation (SWR):

- 4 – 138 kV line terminals.
- 2 – 138 kV ties to Moon Lake Electric 69 kV substation.
- 1 – 138 kV intertie with WAPA.
- 1 – 138 kV intertie with Tristate.

Bonanza-Mona 345 kV Line:

The Bonanza-Mona 345 kV line is a Deseret Power owned line 171 miles long. The transmission corridor falls within Uintah County, Duchesne County, Wasatch County, Utah County, Sanpete County, and Juab County, Utah. The line is located on Private, BLM, Tribal, State Wildlife Reserve, State Trust, National Wilderness, and National Forest lands. The line terminates at Deseret's Bonanza 345 kV substation in Northeastern Utah and PacifiCorp's Mona 345 kV substation in central Utah. The line is exhibited in the Maps of Surface Land Management in Appendix E.

Bonanza-Upalco 138 kV Line:

The Bonanza-Upalco 138 kV line is a Deseret Power owned line and is 53 miles long. The transmission corridor falls within Uintah County and Duchesne County Utah. The line is located on Private, Tribal, State Trust, and BLM lands. The line terminates at Deseret Power's Bonanza 138 kV substation in Northeastern Utah, and Deseret Power's Upalco 138 kV substation located near Roosevelt Utah. The line is exhibited in the Maps of Surface Land Management in Appendix E.

Bonanza-SWR 138 kV Line:

The Bonanza-Southwest Rangely 138 kV line is a Deseret Power owned line and is 26 miles long. The transmission corridor falls within Uintah County Utah. The line is located on BLM, and State Trust lands. The line terminates at Deseret Power's Bonanza 138 kV substation in Northeastern Utah and Deseret Power's Southwest Rangely 138 kV substation located in Rio Blanco county, Rangely Colorado. The line is exhibited in the Maps of Surface Land Management in Appendix E.

Bonanza-Vernal 138 kV Line:

The Bonanza-Vernal 138 kV line is a Deseret Power owned line and is 25 miles long. The transmission corridor falls within Uintah County Utah. The line is located on Private, BLM, and State Trust lands. The line terminates at Deseret Power's Bonanza 138 kV substation in Northeastern Utah and WAPA's Vernal 138 kV substation located near Vernal Utah. The line is exhibited in the Maps of Surface Land Management in Appendix E.

### Blue Mountain Energy 50 kV Railroad:

The Blue Mountain Energy 50 kV railroad catenary is owned by BME. The electric railroad corridor falls within Uintah County Utah. The railroad is located on BLM lands. The 50 kV catenary terminates at Deseret Power’s Bonanza Substation 50 kV bus in Northeastern Utah. There are 37 miles of railway track and catenary between the Bonanza Power Plant and the Deserado coal mine, which 15 miles fall in Utah and is located on BLM lands. The railroad is exhibited in the Maps of Surface Land Management in Appendix E.

Table 3 provides a high-level description of Deseret Power’s T&D assets.

**Table 3. Asset Overview.**

ASSET CLASSIFICATION	ASSET DESCRIPTION
<b>Transmission Line Assets</b>	Approximately 300 miles of conductor, transmission structures and switches at either 345 or 138 kilovolt (kV).
<b>Substation Assets</b>	Major equipment such as power transformers, voltage regulators, capacitors, reactors, protective devices, relays, open-air structures, switchgear, and control houses in 2 substation/switchyard facilities.

## 4 Risk Analysis and Risk Drivers

The attached Wildland Fire Index maps (Appendix C, Appendix D) were used to perform a risk and threat analysis. Data from the Utah Wildland Fire Risk Assessment Portal was used to develop the maps and determine the risk. All of Deseret Power’s transmission lines in Utah have been overlaid on the Wildland Fire Potential and Risk to Drinking Watersheds and Population maps to identify the high-risk and threat areas. Deseret Power’s High Voltage power line corridors fall within primarily rural areas. Each line segment listed above have been reviewed for risk and threat levels. The following identifies the risks and threats for each line segment.

**Deseret Power’s Bonanza-Mona 345 kV line** is located in terrain with varying risk and threat levels in Uintah, Duchesne, Utah, Sanpete, and Juab counties of Utah. The wildfire hazard potential ranges from Very Low to Very High and the risk to drinking watersheds and population range from Very, Very Low to Extreme.

A review of Appendix C, Maps 1 through 10, identify approximately 15 miles of line in Wasatch, Juab and Utah Counties with intermittent areas of Very High wildfire hazard potential (Appendix C, map 8, & 10) The remainder of the line is located within Very Low to High Potential.

A review of Appendix D, Maps 1 through 10 identify approximately 10 miles of line in Wasatch County with intermittent areas of Very High or Extreme Risk. (Appendix D, map 7, & 8) The remainder of the line is located within Very, Very Low to Moderate Risk.

**Deseret Power’s Bonanza-Upalco 138 kV line** is on the same double circuit structures as the Bonanza-Mona 345 kV line for the first 50 miles out of Bonanza and is located within desert terrain with primarily Low to Moderate Wildfire Hazard Potential and Very, Very Low Watershed and Population Risk.

**Deseret Power’s Bonanza-SWR 138 kV line** is located within desert terrain with primarily Low Wildfire Hazard Potential and Very, Very Low Watershed and Population Risk as shown on the Hazard Potential and Watershed and Population Risk Maps in Appendix C and D.

**Deseret Power’s Bonanza-Vernal 138 kV line** is located within desert terrain with primarily Low Wildfire Hazard Potential and Very, Very Low Watershed and Population Risk as shown on the Hazard Potential and Watershed and Population Risk Maps in Appendix C and D.

**Deseret’s BME 50 kV Electric Railroad** is located within desert terrain with primarily Low Wildfire Hazard Potential and Very, Very Low Watershed and Population Risk.

## 4.1 Fire Risk Drivers Related to Construction and Operations

Deseret Power staff evaluated other utility’s fire causes and applied its own field experience to determine the critical potential risk drivers. The categories listed below were identified as having the potential for causing powerline sparks and ignitions:

- Equipment/facility failure
- Foreign contact
- Vehicle impact
- Standard expulsion fuses
- Cross-phasing
- Legacy tree attachments
- Age of assets
- Vandalism

## 4.2 Fire Risk Drivers Related to the Service Area

As part of the risk analysis process, Deseret Power examined its asset locations to identify Risk Drivers (“RDs”) unique to service area. These types of RDs included:

- Topography
- Accessibility
- Climate
- Vegetation Types / fuels



- Fire history
- Tree mortality / tree failure
- Lightning

### 4.3 Fire Weather Key Risk Impacts

Ignitions caused by the aforementioned risk drivers have many possible outcomes. The list below outlines some of the worst-case scenarios, the prevention of which is the impetus for the development of this WFPP:

- Personal injuries or fatalities to the public, employees, and contractors
- Damage to public and/or private property
- Damage and loss of Deseret Power owned infrastructures and assets
- Impacts to reliability and operations
- Damage claims and litigation costs, as well as fines from governing bodies
- Damage to Deseret Power's reputation and loss of public confidence

### 4.4 Wildfire History and Outlook

In Deseret's service area, the fire season typically spans from June 1 – October 31, with an enhanced risk period occurring in the middle of the summer due to heightened temperatures and dry conditions. The predominant cause of wildfires in this region is lightning strikes, or human activity, which can ignite the dry vegetation and spread under certain weather conditions.

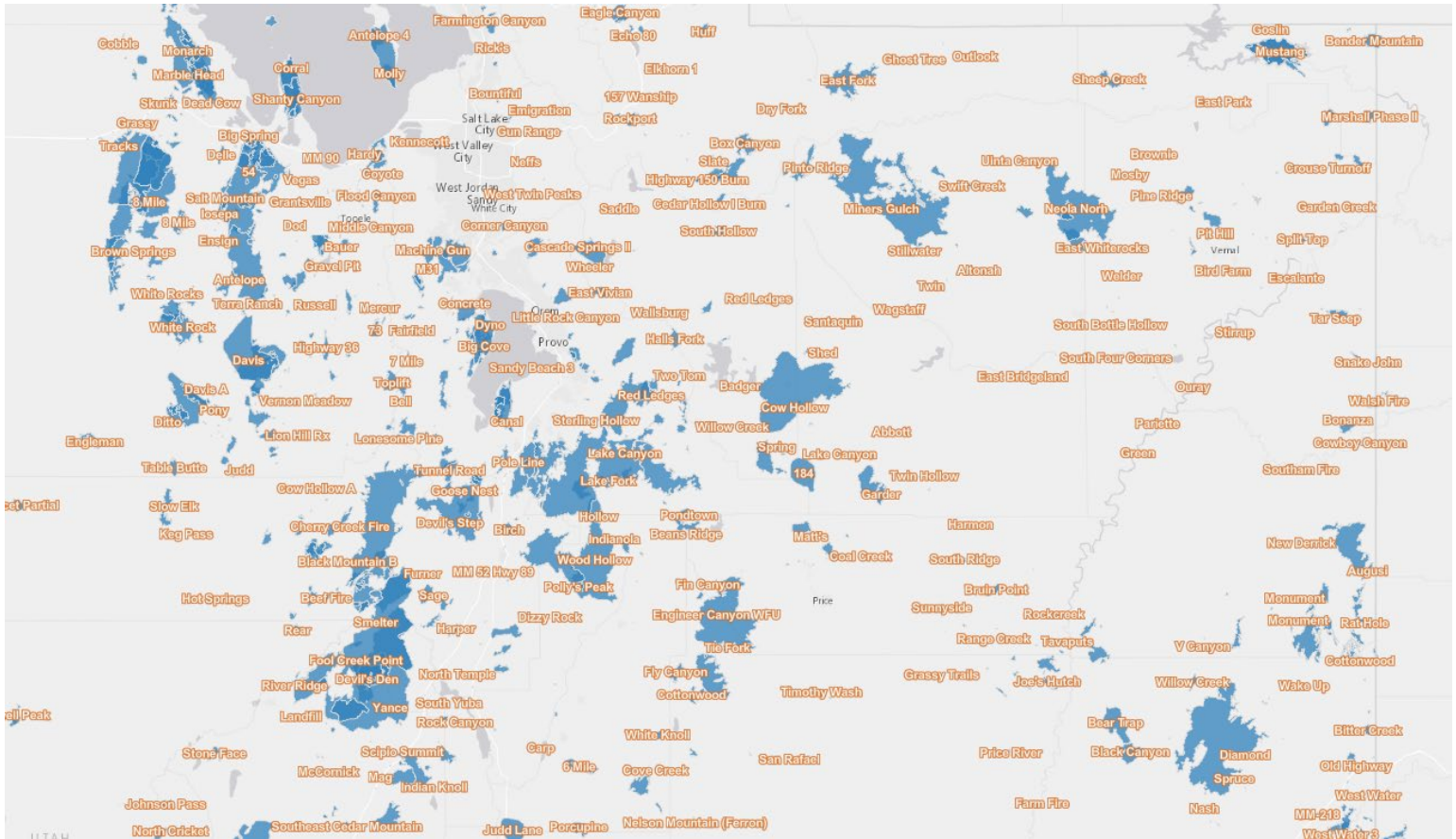
The general service area where Deseret's infrastructure is located has experienced wildfires in the past, some of which have resulted in extended firefighting mitigation work. The area is not densely populated, which can aid in managing and controlling these fires before they reach residential or commercial areas.

There are certain areas within Deseret's service region that are considered high-risk due to their geographical features and vegetation types. The area stretching from Strawberry Reservoir through Spanish Fork Canyon and then down through Sanpete County would be classified as "high risk" according to state fire resources. These areas may include thick, dry vegetation and are often subject to lightning strikes during stormy weather, and are popular outdoor recreation areas, making them high-risk zones for potential wildfires.

As part of Deseret's Wildland Fire Protection Plan, we have implemented strategies and measures aimed at mitigating the risk and impact of wildfires. This includes, but is not limited to, monitoring of weather conditions, regular inspections and maintenance of utility equipment, and maintaining clearances around utility infrastructure to prevent the ignition and spread of fires. Deseret remains dedicated to protecting its service area and its inhabitants from the destructive impact of wildfires.

A map showing the historical fire boundaries is attached as Figure 2.

Figure 2. Historic Wildfire Perimeters 2000-2021 <sup>2</sup>



<sup>2</sup> Information source: <https://utahdnr.hub.arcgis.com/datasets/utahDNR::historic-utah-wildfire-perimeters-1999-to-2020/explore?location=40.027378%2C-111.041493%2C8.70>

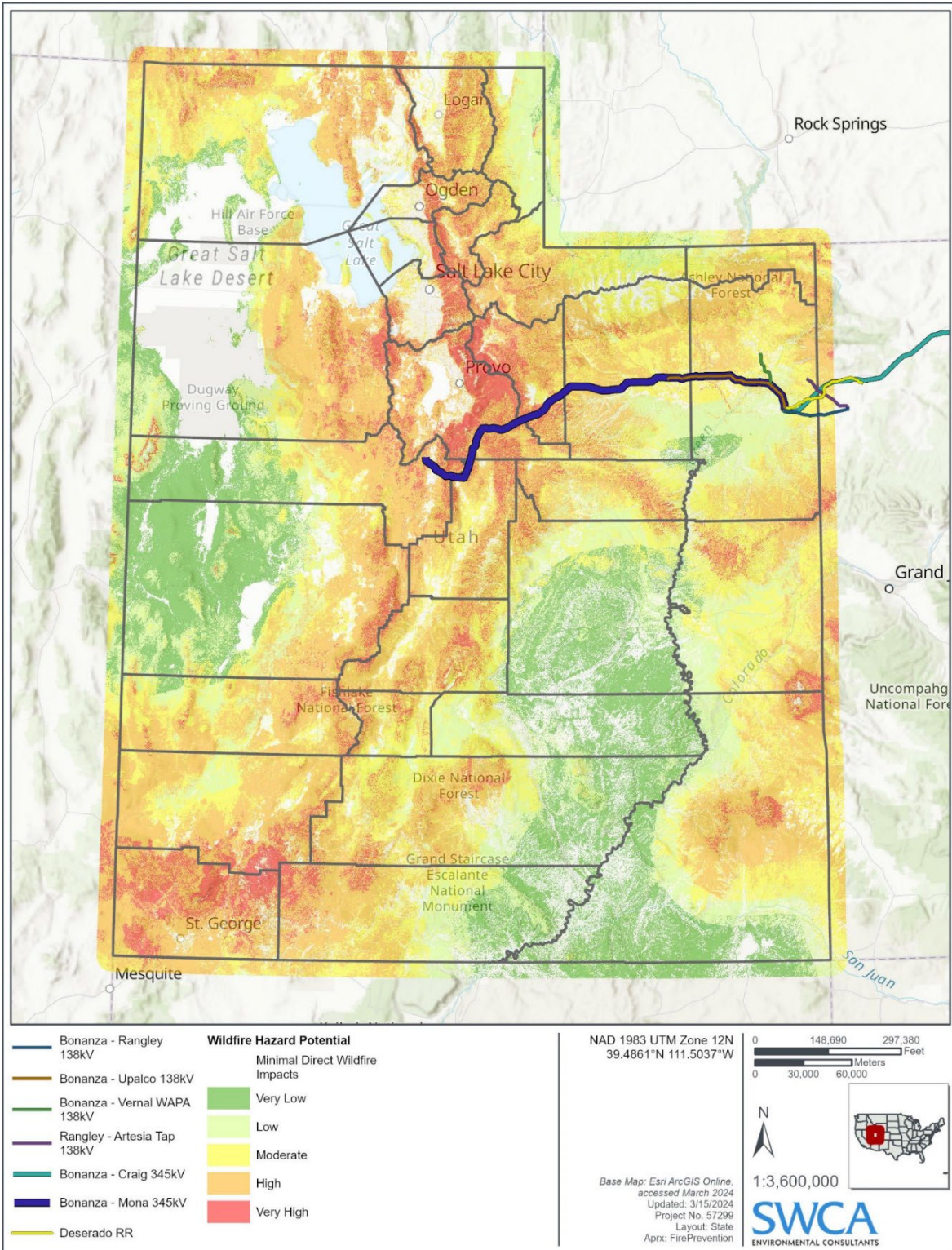
#### 4.4.1 [RESERVED]

### 4.5 Fire Threat Assessment Mapping

The Wildfire Hazard Potential (WHP) risk maps are derived from information provided by the Utah Division of Forestry, Fire & State Lands. On its own, WHP is not an explicit map of wildfire threat or risk, but when paired with spatial data depicting highly valued resources and assets such as structures or powerlines, it can approximate relative wildfire risk to those specific resources and assets.

The data described here are derived from wildfire simulation modeling, and their exact accuracy cannot be measured. They are intended to be relative measures of wildfire risk for planning purposes. See Appendix C for more information.

**Figure 3. Desert Facilities and Wildfire Hazard Potential Overview**



## 5 Wildfire Prevention Strategy and Programs

Annual work plans (Vegetation Management) are developed by the Deseret Power-Power Systems Department, and are based on ground inspections and/or aerial visual patrols of the transmission lines listed above. Each line is scheduled to receive one inspection or patrol per calendar year, with no more than 18 calendar months in-between inspections. The ground and/or aerial inspections are performed throughout the year. Corrective work identified during an inspection is scheduled by the Deseret Power's Power Systems Superintendent and performed by internal crews or contractors. Any required vegetation control will be accomplished by manual clearing. This inspection routine and procedure is outlined in Deseret Power's approved Vegetation Management Plan (VMP-available as a separate document).

If an encroachment into the Minimum Vegetation Clearance Distance (MVCD) is observed in Real-time to pose a threat of flashover, the Power Systems Superintendent will immediately be contacted and advised of the problem. The electrical crew member(s) will be directed to remove the problem vegetation and will remain at the location taking precautions to minimize fire risk until the encroachment can safely be removed. To safely remove the encroachment, a determination will be made whether a line outage is required. If a line outage is required, PacifiCorp Grid Operations will be contacted and an emergency request for a line outage will be made. The crew member(s) will remove the tree or trees that pose a risk of fire or outage upon receiving notice of the line being removed from service.

If a confirmed vegetation encroachment condition is found that is likely to cause a flashover at any moment and could result in a fire or system outage, the crew will contact PacifiCorp Grid Operations without any delay and request that the line be removed from service. The encroachment will then be removed.

Deseret Power developed and implemented a (VMP) beginning in August of 2007 as required by the Federal Energy Regulatory Commission (FERC-FAC-003). The objective of the (VMP) is to ensure the reliable operation of Deseret Power's Transmission by managing vegetation located within the transmission rights of ways (ROW), and to minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of fire and vegetation-related outages. The Deseret VMP includes procedures, vegetation standards, and timeframes used in vegetation inspection for safe and reliable operation that prevent the risk or threat of fire to the transmission system. These procedures have been audited by the Western Electric Coordinating Council several times since 2007 and revised as needed. All Deseret Power owned transmission lines are inspected annually as per the VMP and as described in more detail below. Any vegetation encroachments during an inspection are noted and removed. Thorough records are kept and managed.

Deseret Power's maintenance strategy is to ensure that the Minimum Vegetation Clearance Distance (MVCD) as described in the VMP, is never violated in the transmission corridor and also to maintain adequate clearance to prevent the encroachment of vegetation into the MVCD. It is Deseret Power's maintenance practice to clear cut any vegetation within 15 feet below the conductors for grow-in and 27 feet to the side of conductors to accommodate for conductor swing and sway (See Attachment 6). Deseret Power uses herbicides for control of nuisance trees (Russian Olive) that have been clear cut at the base. Herbicides are reapplied as necessary. The Power Systems Superintendent has discretion to apply more stringent criteria based upon vegetation problems, landownership, terrain, contract easement, or permit rights to remove such trees.

Deseret Power uses the Utah State University Tree Browser ([www.treebrowser.org](http://www.treebrowser.org)) to determine vegetation growth rates for the species of trees located within Deseret Power's transmission line corridors. As determined from the Tree Browser program, two feet per year is the most that any tree

species located within the corridors could grow that would be a clearance concern. Transmission line corridor inspections are conducted with enough frequency to maintain the required clearances.

All transmission lines in Deseret power's system are visually inspected for vegetation growth. The inspections are carried out by experienced linemen patrolling with surface vehicles (ground patrol) and/or helicopter (aerial patrol). The purpose of these patrols is to identify vegetation and transmission line potential problems (damaged equipment or potential flash over items). Trees that have breached the 15-foot grow-in clearance, or 27-foot side sway clearance are scheduled for removal.

All trees that are designated to be removed are completely severed at the base, de-limbed and the trunks are cut into six-foot lengths. Governing Agencies may have specifications as to how to deal with the limbs and tree trunks in special situations. Any special specifications regarding disposal of limbs and trunks will be followed and coordinated when issued by the Governing Agencies.

Blue Mountain Energy's (BME) main objective to prevent fire along the railroad and catenary is vegetation control. BME uses a mix of control agents such as Tordon K, Diuron, Glyphosate, (Round-Up), 2-4-D and Surfactant for vegetation control. These agents are sprayed 8' out from center line of the Railroad track. BME employees also physically remove any remaining vegetation around catenary poles. Where growth is heavy on the ROW, vegetation removal is done by grader work.

During the summer months BME keeps firefighting equipment parked at mile post 16.5 (Midway) prepared to travel in either direction loaded with 2,500 gallons of water. The pump is hydraulically driven at 207 gallon per minute with 150 feet of hose.

## 5.1 Transmission System Operational Practices

### 5.1.1 De-energization – Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) preemptively de-energizes power lines during high wind events combined with hot and dry weather conditions. When considering de-energization, Deseret Power examines the impacts on fire response, water supply, public safety, and emergency communications.

Deseret Power considers the external risks and potential consequences of de-energization while striving to meet its main priority of protecting the communities and members we serve. They include:

- Potential loss of water supply to fight wildfires due to loss of production wells and pumping facilities.
- Negative impacts to emergency response and public safety due to disruptions to the internet and mobile phone service during periods of extended power outages.
- Loss of key community infrastructure and operational efficiency that occurs during power outages.
- Medical emergencies for members of the community requiring powered medical equipment or refrigerated medication. Additionally, the lack of air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities.
- Traffic congestion resulting from the public evacuation in de-energized areas can lengthen response times for emergency responders.
- Negative economic impacts from local businesses forced to close during an outage.
- The inability to open garage doors or motorized gates during a wildfire event can lead to injuries and fatalities.

The decision to utilize a PSPS is highly dependent on specific facts, circumstances, and real-time conditions. As such, it is challenging to predict in advance when and/or if it will be necessary to de-energize power lines. It is through careful and continuous monitoring of weather patterns, environmental conditions, system integrity, and in consultation with the relevant AHJ that Deseret Power will make the decision to implement a PSPS. This decision is not taken lightly and is only employed when the specific facts and circumstances indicate a significant risk of wildfire ignition from the electric overhead transmission system. The PSPS is a last-resort mitigation tool used in potential crisis situations when all other preventative measures may not suffice.

On a case-by-case basis, Deseret Power has historically and will continue to consider de-energizing a portion of its system in response to a known public safety issue or in response to a request from an outside emergency management/response agency. Any de-energizing of the lines is performed in coordination with key local partner agencies, however, the final determination is made by Deseret Power.

### 5.1.2 Recloser Operational Practices

Deseret Power operates under a policy that eliminates reclosing of any transmission lines that originates from or has a terminus at the Bonanza substation, with the exception of the SW Rangely – Bonanza,

Upalco - Bonanza, and SW Rangely - Calamity 138KV lines, which are equipped with one-shot reclosing capabilities at the remote substations.

In circumstances where elevated fire risk is detected, Deseret Power has the ability to disable the reclosing feature on any line that could potentially escalate fire danger by reclosing on a fault. This disabling feature can be actioned locally at the relevant substation or remotely by grid operators under the instruction of Deseret Power. An elevated fire risk is determined by utilizing several key resources and technologies to monitor evolving fire weather and climatological conditions that could lead to fire events.

One of the primary resources is the Great Basin Coordination Center, which serves as a comprehensive hub of resources offering an array of predictive services capable of forecasting potential fire risks. This site provides daily updates during the fire season, ensuring users have access to the most current and relevant risk information.

In addition to the Great Basin Coordination Center, Deseret Power will also rely on real-time data provided by its own network of remote weather monitoring stations. These stations are or will be strategically located in remote areas with a higher risk of wildfires. The stations monitor key weather parameters such as temperature, wind speed and direction, barometric pressure, and relative humidity. This data enhances Deseret Power's ability to assess fire risk conditions and respond proactively to prevent potential fire events.

The USFS-Wildland Fire Assessment System (WFAS) and the NOAA Weather and Hazards Data Viewer are other key resources used to monitor real-time and forecasted wildfire conditions, as well as extreme weather alerts such as fire weather watch, high wind watch, and red flag warnings. The WFAS provides mapping tools that help determine daily and short-term forecasted risk, with daily or weekly fire weather status maps produced as needed. The NOAA Weather and Hazards Data Viewer, on the other hand, provides historic or real-time surface observations collected from remote automated weather stations. Additionally, Deseret Power also refers to the Current Utah Wildfire Risk map, which shows current Fire Danger Ratings and active large fires, serving as a comprehensive fire information dashboard.

If these resources indicate an elevated risk of a fire event, Deseret Power can take proactive measures such as disabling the reclosing feature on any line that could potentially escalate fire danger by reclosing on a fault. This can be actioned locally at the relevant substation or remotely by grid operators under the instruction of Deseret Power.

In cases where reclosing has been carried out or disabled, Deseret Power will provide notification to any parties who could be impacted by this action or who could influence Deseret Power's operations. This includes nearby communities, local authorities, emergency services, and other utilities operating in the area.

This comprehensive approach, which combines technical measures with clear communication protocols, is part of Deseret Power's commitment to fire safety and mitigation, particularly during periods of heightened wildfire risk.



### 5.1.3 Situational Awareness

Situational assessment is the process by which current operating conditions are determined. Situational Awareness is the understanding of the working environment, which creates a foundation for successful decision making and the ability to predict how it might change due to various factors.

Deseret Power's System Operators rely on various resources to monitor evolving fire weather and climatological conditions that may lead to fire events. Sources for weather information include, but are not limited to the following:

- **USFS-Wildland Fire Assessment System (WFAS):** For immediate and short-term situational awareness, mapping tools from the USFS-WFAS help determine daily and short-term forecasted risk, with daily or weekly fire weather status maps produced as needed to assess Great Basin wildfire conditions. (<https://gacc.nifc.gov/gbcc/outlooks.php>)
- **The National Weather Service (NWS):** The NWS provide on-line predictive fire weather forecasting tools in the form of a current fire-weather outlook, 2-day, and a 3-8 day outlook. ([https://www.spc.noaa.gov/products/fire\\_wx/](https://www.spc.noaa.gov/products/fire_wx/))
- **NOAA Weather and Hazards Data Viewer:** This on-line map provides historic or real-time surface observations including wind speed and direction, wind gust, dew point, relative humidity, and sea level pressure collected from remote automated weather stations (RAWS). Extreme-weather alerts such as fire weather watch, high wind watch, and red flag warning are provided from this resource. (<https://www.wrh.noaa.gov/map/?wfo=psr>)
- **Current Utah Wildfire Risk:** This map shows current Fire Danger Ratings, active large fires, and serves as a Comprehensive fire information dashboard. (<https://utahdnr.maps.arcgis.com/apps/MapSeries/index.html?appid=d2fa9295f3424ddbbb26bcf9a81f7ad5>)
- **Great Basin Coordination Center:** This site serves as a comprehensive hub of resources, offering an array of predictive services that are capable of forecasting potential fire risks. In addition to these predictive services, the site provides daily updates during the fire season, ensuring users have access to the most current and relevant risk information. The continual updates allow for proactive and timely responses to any changes in fire risk, thereby contributing significantly to prevention and management efforts. (<https://gacc.nifc.gov/gbcc/>).
- **MESO West:** This platform functions as a comprehensive source of meteorological information, meticulously recording specific data points relating to weather conditions in various locations. Accompanied by precise timestamps, each data point represents a snapshot of a particular moment's weather status. To ensure the most accurate and relevant information, the data on this site undergoes regular updates and revisions, maintaining the most current and reliable weather data available. (<https://mesowest.utah.edu/cgi-bin/droman/mesomap.cgi?state=UT&rawsflag=3>).
- **Deseret Power Weather Stations:** In addition to the resources currently in use, Deseret Power is planning to install several remote weather monitoring stations in remote areas with elevated risk as part of its updated Wildland Fire Protection Plan. It is anticipated that these stations will provide real-time data on key weather parameters such as temperature, wind speed and direction, barometric pressure, and relative humidity. The data gathered from these monitoring stations will

enhance Deseret Power's ability to assess fire risk conditions and respond proactively to prevent potential fire events. Real-time monitoring will also provide valuable data that can help in making critical decisions during an active fire event. The implementation of these weather stations will further strengthen Deseret Power's situational awareness and ability to respond effectively to evolving fire weather and climatological conditions. Weather station installations are planned over a three-year period. Ten stations are planned to be put in service per year from 2024 to 2027 with thirty stations planned to be operational by 2027. The effectiveness of the weather stations will be evaluated near the end of 2027, additional stations will be planned if deemed necessary.

## 5.2 Infrastructure Inspections and Maintenance

Recognizing the hazards of equipment that operate high voltage lines, Deseret Power maintains a formal inspection and maintenance program for transmission, and substation equipment which plays an essential role in wildfire prevention. Deseret Power currently patrols its system regularly and is increasing the frequency of inspections in high-risk areas. Table 3 summarizes the inspection schedule for all assets, while the following sections outline inspection practices for the utility.

**Table 3. Inspection Program Summary**

ASSET CLASSIFICATION	INSPECTION TYPE	FREQUENCY
<b>Transmission</b>	Routine Safety Patrol Inspection	Annually <sup>3</sup>
	Detailed Inspection	As required
	Wood Pole Test and Treatment	Every 10 years
	Aerial Inspections	Bi-annually
<b>Overhead Transmission</b>	Routine Safety Patrol Inspection	Annually
	Detailed Inspection	As required
	Wood Pole Test and Treatment	Every 10 years
<b>Substation</b>	Routine Inspection	Monthly
	Detailed Inspection	As specified by maintenance schedule of specific equipment
	Infrared Inspection	Bi-Annually

<sup>3</sup> Annual inspections are typically done in the spring or early summer timeframe

### 5.2.1 Definition of Inspection Levels

1. **Routine Safety Patrol Inspection:** A simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.
2. **Detailed Inspection:** Individual pieces of equipment and structures are carefully examined visually and through use of routine diagnostic testing as appropriate. If practical and useful information can be gathered, equipment may be opened, and the condition rated and recorded.
3. **Intrusive Pole Inspection:** Inspections involving the movement of soil, taking samples of the wood pole for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections. Chemical treatments are applied as needed.

### 5.2.2 Routine Safety Patrol Inspections

Deseret performs routine safety inspections along with normal routine asset inspections. All of Deseret's substations are inspected at least monthly, and all transmission lines are inspected at least annually. Deseret does not own any distribution lines. During safety inspections, some of the items that are checked include but are not limited to:

- Low clearance of conductors
- Excessive splicing
- Objects too close to electric lines
- Encroachments including vegetation.
- Physical damage to facilities
- Deterioration of facilities
- Bird nests
- Joint-use violations
- Inadequate fencing or failing enclosures

### 5.2.3 Detailed Inspections of Transmission Lines

Transmission lines are patrolled twice a year by air (once prior to fire season, one after or during fire season), and once a year by ground. Aerial infrared patrols are performed once per year. Aerial inspections are made by helicopter utilizing qualified power system employees on board as inspectors. Ground patrols are done using four-wheel drive vehicles in most cases. Foot patrols are also necessary in some areas. The rights-of-ways are patrolled by linemen who inspect the lines from the ground. In hard to access areas, drones may be used.

The following is a partial list of checks made during detailed line inspections;

- Low clearance of line conductors
- Condition of conductors and grounds including physical damage
- Condition of guy wires
- Condition of insulators including attaching hardware
- Inspection for nests or other animal contamination

- Evidence of arcing, burning or other fault indicators

Any conditions found to be out of good repair will be reported to the powerline/supervisor or Power System Superintendent. Unacceptable discrepancies will immediately be scheduled for repair.

#### 5.2.4 Wood Pole Testing and Treatment

To maintain Deseret Power wood poles, a formal Wood Pole Assessment Plan was initiated with the goal to inspect \_10% of the system each year. Wood pole inspections are carried out on a planned basis to determine whether they have degraded below National Electric Safety Code (NESC) design strength requirements with safety factors.

A third-party contractor inspects and tests all poles on a cycle meeting the interval recommended by common utility practice. Circuits are identified, mapped, and scheduled for inspection and testing using latest industry standards and practices. Poles suspected of deficiencies are subjected to intrusive inspection to determine and identify problems such as rot, decay, or insect damage. All poles that are non-thru bore, as well as thru bore poles older than 20 years are subjected to intrusive inspection. Based on the results of the intrusive test, wood treatments are then administered.

#### 5.2.5 Substation Inspections

The Preventive Maintenance Plan provides for regular inspections of Deseret Power substations on a 30 day cycle. Qualified personnel will use prudent care while performing inspections following all required safety rules to protect themselves, other workers, the general public, and the system's reliability.

The substation inspection involves a thorough look at the system to confirm that there are no structural or mechanical deficiencies, hazards, or tree trimming requirements. Individual pieces of equipment and or structures receive careful visual examination and routine diagnostic tests as appropriate.

#### 5.2.6 Prioritization of Repairs

Deseret Power considers and prioritizes maintenance work by assessing the most urgent needs. The inspector will document the overhead systems' condition, recording defects, deterioration, violations, safety concerns, or any other factors requiring attention on the inspection records. The inspection shall focus on any hazards that could affect the system's integrity or the safety of line workers and the public.

Inspection data (overhead) will be prioritized and issued as follows:

**Priority # 1 – Immediate hazard:** Conditions that may affect the integrity of the system or present a hazard to workers or the general public. Priority #1 tags will be responded to **immediately** and appropriate action taken until the hazardous condition is remedied.

**Priority # 2 – Non-emergency repair condition:** Conditions that require maintenance that can be scheduled to maintain the integrity of the system. Priority #2 tags will be prioritized by urgency and will be scheduled to have appropriate repairs made to correct the condition within two years where practicable. If the Priority Level 2 issue is located in a High Risk zone and poses a potential fire risk, correction of the deficiency will occur at the first available convenience.

**Priority # 3 – Non-emergency repair condition:** Conditions that do not present a situation that could jeopardize the safety of the system, line workers and the general public. Priority #3 tags will be submitted by the inspector with the time interval recommended. In the judgment of the Work and Asset Management Department, work will be scheduled to be completed within five years.

### 5.3 Vegetation Management (VM)

Deseret Power developed and implemented a Vegetation Management Program (VMP) that began in August of 2007 as required by the Federal Energy Regulatory Commission (FERC-FAC-003). The objective of the VMP is to ensure the reliable operation of Deseret Power's Transmission by managing vegetation located within the transmission rights of ways (ROW), and to minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of fire and vegetation-related outages. The Deseret VMP includes procedures, vegetation standards, and timeframes used in vegetation inspection for safe and reliable operation that prevent the risk or threat of fire to the transmission system. These procedures have been audited by the Western Electric Coordinating Council several times since 2007 and revised regularly as needed. All Deseret Power owned transmission lines are inspected annually as per the VMP and as described in more detail below. Any vegetation encroachments during an inspection are noted and removed. Thorough records are kept and managed.

Deseret Power's maintenance strategy is to ensure that the Minimum Vegetation Clearance Distance (MVCD) as described in the VMP, is never violated in the transmission corridor and also to maintain adequate clearance to prevent the encroachment of vegetation into the MVCD. It is Deseret Power's maintenance practice to clear cut any vegetation within 15 feet below the conductors for grow-in and 27 feet to the side of conductors to accommodate for conductor swing and sway (See Attachment 6). Deseret Power uses herbicides for control of nuisance trees (Russian Olive) that have been clear cut at the base. Herbicides are reapplied annually. The Power Systems Superintendent has discretion to apply more stringent criteria based upon vegetation problems, landownership, terrain, contract easement, or permit rights to remove such trees.

Deseret Power uses the Utah State University Tree Browser ([www.treebrowser.org](http://www.treebrowser.org)) to determine vegetation growth rates for the species of trees located within Deseret Power's transmission line corridors. As determined from the Tree Browser program, two feet per year is the most that any tree species located within the corridors could grow that would be a clearance concern. Transmission line corridor inspections are conducted with enough frequency to maintain the required clearances.

All transmission lines in Deseret power's system are visually inspected for vegetation growth. The inspections are carried out by patrolling with surface vehicles (ground patrol) and/or helicopter (aerial patrol). The purpose of these patrols is to identify vegetation and transmission line potential problems (damaged equipment or potential flash over items). Trees that have breached the 15-foot grow-in clearance, or 27-foot side sway clearance are scheduled for removal.

All trees that are designated to be removed are clear cut at the base, de-limbed and the trunks are cut into six-foot lengths. Governing Agencies may have specifications as to how to deal with the limbs and tree trunks in special situations. Any special specifications regarding disposal of limbs and trunks will be followed and coordinated when issued by the Governing Agencies.

Blue Mountain Energy's (BME) main objective to prevent fire along the railroad and catenary is vegetation control. BME uses a mix of control agents such as Tordon K, Diuron, Glyphosate, (Round-

Up), 2-4-D and Surfactant for vegetation control. These agents are sprayed 8' out from center line of the Railroad track. BME employees also physically remove any remaining vegetation around catenary poles. Where growth is heavy on the ROW, vegetation removal is done by grader work.

- During the summer months BME keeps firefighting equipment parked at mile post 16.5 (Midway) prepared to travel in either direction loaded with 2,500 gallons of water. The pump is hydraulically driven at 207 gallon per minute with 150 feet of hose.

### 5.3.1 Vegetation to Conductor Clearance

Deseret Power has an operational and management responsibility and is required by State and Federal Agencies to maintain the right of way, under or around its power lines. Deseret Power will meet the minimum standards for conductor clearances from vegetation to provide safety for the public and utility workers, reasonable service continuity and fire prevention.

Vegetation Management (VM) operations are scheduled to ensure all lines are cleared of vegetation hazards on a 4-year minimum or as needed timeline. During tree work, contractors aim to achieve the clearance specifications described below.

- **138 kV Transmission:** Minimum 15 feet from the center line
- **345 kV Transmission ROW (defined width) in a Elevated Fire Risk Area:** 50 feet from the center line. Defined width ROWs are generally found on cross-country corridors.
- **Trees Under Conductors:** Trees that are under conductors should have crowns reduced to a height 15 feet below the primary conductors or be removed.

### 5.3.2 Vegetation Trimming Standards

Deseret Power's contractors follow American National Standards Institute (ANSI) A300 concepts and utility directional pruning, which supports proper pruning/tree health while achieving and maximizing the pruning cycle. The VM program was developed with RUS, ANSI A300, ANSI C2, National Electrical Safety Code (NESC), and FAC 003-4 standards in mind.

Work performed to the above guidelines provides reasonable service continuity, public safety, and guards against wildfire damage caused by supply conductors. Consideration is given to the impact of pruning on power line reliability, individual tree condition, and tree aesthetics.

Deseret Power currently clears vegetation 50 feet to each side of its center line, and will make reasonable efforts to seek approval from the pertinent regulatory authorities, including the United States Forest Service, for permission to extend this clearance.

### 5.3.3 VM Trimming and Inspection Schedule

Deseret Power personnel and contractors perform annual, ground-based inspections of tree conductor clearances and hazard tree identification for Deseret Power ROWs and easements. Deseret Power

contracts specialized tree trimming crews for year-round vegetation management work. Deseret Power line crews also address vegetation concerns in response to service calls or field observations. Proactive maintenance during routine operations and prompt action during emergency events maintain system reliability, a safe work environment, and reduces fire danger. Any VM issues that cannot be immediately handled by the line crews are referred to the VM contractor for priority trimming. Scheduled patrols ensure all lines are inspected for vegetation hazards and systematically trimmed. On-going, year-round field patrols identify targeted areas for vegetation pruning or removal and ensure compliance with state and federal regulatory requirements.

### 5.3.4 Hazard Trees

A subset of Danger Trees<sup>4</sup>, A Hazard Tree is defined as any tree or portion of a tree that is dead, rotten, decayed, or diseased and which may fall into or onto the overhead lines or trees leaning toward transmission facilities. These trees are sometimes located beyond the easement or ROW. Any tree that is located outside of the ROW and is deemed a hazard tree will be removed or topped to make safe for conductors.

A hazard tree will have one or more of the following characteristics:

- Dead or dying - all dead or dying trees along, or outside the Deseret Power right-of-way may be removed depending on the height of tree and the direction of the lean.
- Leaning trees - trees that have such a lean toward the right-of-way that they cannot be trimmed without removing the tops and slanting the tree back. Removal depends on height and species of the tree and direction of the lean.

### 5.3.5 [RESERVED]

## 5.4 Wildfire Mitigation Construction

- Deseret's 345kV line, which crosses the areas within Deseret's system at higher risk for wildfire, is constructed with steel structures. Steel is an inherent fire-resistant material, and significantly reduces the risk of failure during a weather event. Deseret does not own distribution lines and therefore does not install, own, or operate expulsion fuses.

### 5.4.1 Avian Protection

As part of Deseret Power's transmission and substation routine inspections, efforts will be made to note any evidence of avian activity. Particular attention will be given to signs of "streamers" and any nests or nesting materials. All evidence will be documented and reported to the power line supervisor.

Any reported nests will be reinspected in detail. All nests will be inspected for the following;

- Is the nest active, signs of recent activity
- Materials used in construction

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<sup>4</sup> As defined by ANSI 300 Part 7 standards



- The distance between the nest and live conductors
- The possibility of the nest causing a ground or phase to phase fault
- Obvious potential for fire ignition

Any nests that appear to be a threat for causing a fault and/or ignition will be identified for removal. If the nest is obviously active, efforts will be made to have the nest analyzed by the Utah Division of Wildlife Resources or other suitable organization. All threat nests will be removed as soon as practicable.

In addition to inspection and maintenance strategies, bird deterrents will be installed in locations where frequent avian activity has been elevated. Bird deterrent measures will be inspected during routine maintenance to evaluate effectiveness.

## 5.5 Emerging Technologies

Deseret Power has initiated various projects (such as drone implementation, infrared scanning, remote weather stations) to explore new technologies and best management practices. These projects serve to evaluate the effectiveness of emerging technologies while controlling unwarranted expenditures on unproven methods. Deseret Power will integrate these technologies or practices into its ongoing maintenance programs based on the outcomes that show an actual benefit. Deseret does not own distribution lines and therefore does not install, own, or operate expulsion fuses.

# 6 Emergency Response

## 6.1 Preparedness and Response Planning

Deseret Power has a Crisis Communications Plan (CCP) that outlines how to effectively communicate in a clear, consistent, and timely manner with relevant stakeholders during a disruptive event. This includes internal communication with staff, external communication with the media, and the public, as well as coordination with local, state, and federal agencies.

### 6.1.1 Emergency Management Communication and Coordination

In response to active emergencies, Deseret Power coordinates and collaborates with the area, County and State Dispatch centers (911), and relevant state agencies as a peer partner. During such emergencies, Deseret Power provides a utility representative to the county and/or city to ensure effective communication and coordination.

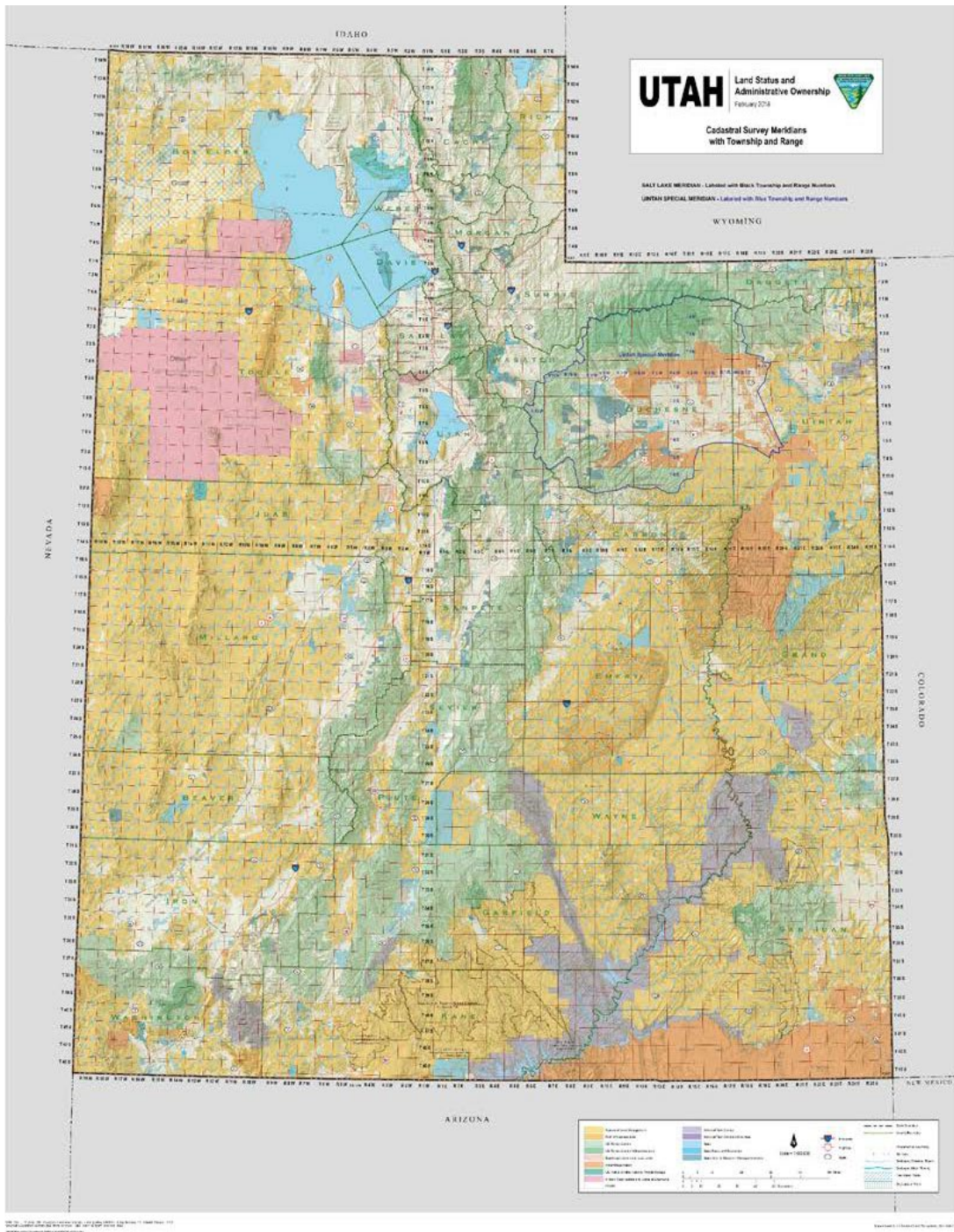
Deseret Power's primary coordination point is Mike Eriksson, Northeastern Area Manager, and Jason Torgerson, Central Area Manager with the Utah Division of Forestry and Fire. Deseret Power's Power Systems Superintendent will contact the area dispatch centers and establish themselves as the duty officer for coordination. The General Counsel acts as the communications officer during an emergency. Deseret will also work with state officials, area managers, fire management officers (FMO) and area dispatch centers to develop a current contact list to be included in this plan.

### 6.1.2 Jurisdictional Structure

Deseret Power's service area encompasses a diverse range of land ownership and management categories. Predominantly, our transmission and service lines cross areas managed by the U.S. Forest Service and Bureau of Land Management (BLM). In addition to federal lands, our service area also includes state-managed lands and privately owned properties. Deseret adheres to the specific regulations and requirements of each state where we operate and maintain open lines of communication with private landowners. Our approach is collaborative, ensuring that all parties are informed and consulted about our activities.

In all cases, Deseret Power seeks to operate in a manner that respects the land, minimizes environmental impact, and contributes to the overall safety and well-being of the communities we serve. We are committed to working closely with all land management entities to prevent and mitigate wildfires and to ensure the reliable delivery of power to our customers.

**Figure 4. General Land Ownership**



6.1.3 [RESERVED]

6.1.4 [RESERVED]

## 6.2 Restoration of Service

If an outside emergency management/emergency response agency requests a power shutdown, or if Deseret Power elects to de-energize segments of its system due to extreme weather, Deseret Power staff will take appropriate and necessary precautionary steps before the system can be re-energized. Poles and structures damaged in a wildfire must be assessed and rebuilt as needed prior to re-energization. Periodic customer and media updates of restoration status prior to full restoration will be made.

### 6.2.1 Service Restoration Process

After a wide-spread outage, Deseret Power work crews take the following steps before restoring electrical service after a de-energization event. These measures intend to protect the worker, members, the public, and the system's reliability.

- **Patrol:** Crews patrol de-energized lines when necessary to ensure no hazards have affected the system during the outage. If an outage is due to wildfire or other natural disasters, as soon as it is deemed safe by the appropriate officials, crews inspect lines and equipment for damage, foreign contacts and estimate equipment needed for repair and restoration. Lines located in remote and rugged terrain with limited access may require additional time for inspection. Deseret Power personnel assist in clearing downed trees and limbs as needed.
- **Isolate:** Isolate the outage and restore power to areas not affected.
- **Repair:** After the initial assessment, Deseret Power staff meet to plan the needed work. Rebuilding commences as soon as the affected areas become safe. Repair plans prioritize substations and transmission facilities, then transmission circuits serving the most critical infrastructure needs. While the goal to reenergize all areas is as soon as possible, emergency services, medical facilities, and utilities receive first consideration when resources are limited. Additional crew and equipment are dispatched as necessary.
- **Restore:** Periodic customer and media updates of restoration status before full restoration are posted on social media platforms and Deseret Power's website. After repairs are made, power is restored to homes and businesses as quickly as possible. Members, local news, and other agencies receive notification of restored electric service.

## 7 Plan Monitoring

### 7.1 Plan Accountability

Staff responsibility for plan implementation and general communications is described below:

- The Board of Directors makes policy decisions relative to the utility, and will ultimately be responsible for approving and adopting the Wildland Fire Protection Plan.
- The Power Systems Superintendent directs staff responsible for operations, and overall execution the WFPP. Staff will be directed as to their roles and responsibilities in support of the plan, The Power Systems Superintendent also oversees all contractors and contract work.

- The General Counsel is responsible for communicating with the public during an emergency or planned maintenance outages.
- The Power Systems Superintendent determines when and how to notify outside agencies in cases of wildfire emergency events.
- Deseret Power's Power Systems Superintendent, General Counsel, and Director of Transmission will be responsible for monitoring and auditing the targets

## 7.2 Monitoring and Auditing of the WFPP

The WFPP will be reviewed annually for the purpose of updating the plan as needed to reflect knowledge gained in the preceding year and modified accordingly. Management will file with its governing authority an annual report detailing the electric cooperative's compliance with the wildland fire protection plan. A more formal review will be done every 3 years as required by Title 54, Chapter 24, Section 203. Updated plans will be submitted on or before October 1 of every third year after calendar year 2020, and ratified by the Governing Authority by December 31 every third year.

### 7.2.1 Identifying Deficiencies in the WFPP

The General Council will be responsible for ensuring that this WFPP meets all public agency guidelines to mitigate the risk of its assets becoming the source or contributing factor of a wildfire. Staff responsible for assigned mitigation areas have the role of vetting current procedures and recommending changes or enhancements to build upon the strategies in the WFPP. Either due to unforeseen circumstances, regulatory changes, emerging technologies or other rationales, deficiencies within the WFPP will be sought out and reported to the Board of Directors in the form of an updated WFPP on an annual basis.

The Power Systems Superintendent, General Counsel, and Director of Transmission or their designee will be responsible for spearheading discussions on addressing any plan deficiencies and collaborating on solutions when updating the WFPP. At any point in time when deficiencies are identified, the Supervisors or their delegates are responsible for making the appropriate policy adjustments.

## 7.3 [RESERVED]

## 7.4 Programmatic QA/QC processes

### 7.4.1 Transmission System Inspection QC Process

All transmission and substation assets are to be visually inspected annually. Inspections to be made by foot, helicopter, and drone where necessary. All inspections and corrective maintenance will be documented, and results will be stored on company servers.

Every calendar year, the powerline/substation supervisor will physically inspect no less than 10% of corrective maintenance performed including inspection and repair documentation. This supervisor will also inspect no less than 10% of pole test and treatments. There will also be a review of 10% of all facility inspections documentation.

### 7.4.2 Vegetation Management QC Process

Vegetation management to transmission and substation assets will be conducted by company and contracted personnel. All management activities will be documented, and the results will be stored on company servers. The powerline/substation supervisor will conduct inspections on no less than 10% of vegetation maintenance of our assets. This inspection will include a review of the supporting documentation for the audited maintenance. In addition to in person inspections, all transmission lines will be inspected by helicopter twice annually. These aerial inspections will include investigation of the adequacy of vegetation maintenance. Documentation of aerial results will be stored on company servers. All inspection and maintenance documentation will be retained in hard copy and on company servers for no less than three years.

Annually, the power system superintendent will review vegetation and maintenance records.

## 7.5 Plan Approval Process

### 7.5.1 Coordination With State Or Local Wildland Fire Protection Plans

Prior to the Plan being ratified by the Governing Authority, Deseret will provide copies of its draft plan to state and local fire officials, including area managers, state fire agencies, applicable state and federal offices, and interested third-parties. Where possible, Deseret will facilitate discussions with these agencies to answer questions and discuss possible items to be included in the Plan.

### 7.5.2 [RESERVED]

### 7.5.3 Board Presentation and Plan Adoption

Deseret shall submit the wildland fire protection plan to its governing authority on or before October 1st of every third year after calendar year 2020, and have that plan ratified by the Governing Authority before December 31 of the same year.

After determining that the plan is reasonable, in the interest of Deseret and its members, and appropriately balances the costs of implementing the plan with the risk of a potential wildland fire, the Governing Authority shall approve the WFP.

Deseret shall file with the commission a copy of the annual report detailing Deseret's compliance with the wildland fire protection plan.

Information and meeting minutes can be added as an addendum after Deseret Power’s board presentation and plan adoption. Plans must be updated and submitted by October 1<sup>st</sup> of every third year after calendar year 2020.

**7.5.4 Submittal to the Utah Utility Commission**

Deseret shall file with its Governing Authority an annual report detailing the electric cooperative’s compliance with the wildland fire protection plan; and file with the commission a copy of the annual

Version No.	Date of Approval	Date of Submittal to Commission
v1	July 16, 2020	July 21, 2020
v1.2	September 23, 2021	October 1, 2021
v1.3	November 20, 2022	November 28, 2022
v2.0	March 21, 2024	March 26, 2024

compliance report which the commission will then make available for public inspection.

**Table 4. Commission Submittal Record**

## Appendix A: Plan and Mapping Disclaimers

### **WILDLAND FIRE PROTECTION PLAN DISCLAIMER**

The information provided in this report was developed by Deseret Power staff and is intended for Deseret Power's internal planning purposes only. Deseret Power does not warrant the accuracy, reliability, or timeliness of any information in this report, and assumes no liability for any errors, omissions, or inaccuracies in the information provided. Deseret Power shall not be held liable for losses caused by using this information. Portions of the data may not reflect current conditions. Any person or entity who relies on any information obtained from this report, does so at their own risk. This report is presented solely for internal use AS-IS by Deseret Power staff. Deseret Power make no representations or guarantees expressed or implied regarding the accuracy or completeness of the report.

### **WFPP MAPPING DISCLAIMER**

Maps in this report were created from multiple datasets from various, public, and private sector sources and may include utility Geographic Information System (GIS) data. The geographic information contained in the map(s) is not to be used as a "legal description" or for any purpose other than general planning and reference. Every effort has been made to ensure the accuracy of the map(s), but errors in source documents do occur and inherent mapping ambiguities are not shown.

Maps are for information purposes only and may not represent actual current conditions. End users assume all liabilities incurred by them, or third parties, as a result of their reliance on the information contained in the map(s). Deseret Power, including, without limitation, its employees, agents, representatives, officers, and directors, may not be held responsible or liable in any way for any information and/or data, or lack thereof, provided in the map(s). Information and/or data included in the map(s) is used solely at the discretion of the recipient.

Deseret Power make no claims, representations, or warranties, expressed or implied, concerning the validity or accuracy of this data. Deseret Power assumes no liability for any errors, omissions, or inaccuracies in the information provided regardless of their cause. Deseret Power produced maps are not to be copied or distributed without permission.



## Appendix B: Code Citation

### **Title 54 Public Utilities**

#### **54-4-1. General jurisdiction (Effective 5/4/2022)**

The commission is hereby vested with power and jurisdiction to supervise and regulate every public utility in this state, and to supervise all of the business of every such public utility in this state, and to do all things, whether herein specifically designated or in addition thereto, which are necessary or convenient in the exercise of such power and jurisdiction; provided, however, that the Department of Transportation shall have jurisdiction over safety functions of public utilities as granted by Subsections 54-4-15(1) through (3) and in Title 72, Transportation Code.

#### **54-4-14. Safety regulation (Effective 5/4/2022)**

The commission shall have power, by general or special orders, rules or regulations, or otherwise, to require every public utility to construct, maintain and operate its line, plant, system, equipment, apparatus, tracks and premises in such manner as to promote and safeguard the health and safety of its employees, passengers, customers and the public, and to this end to prescribe, among other things, the installation, use, maintenance and operation of appropriate safety or other devices or appliances including interlocking and other protective devices at grade crossings or junctions, and block or other system of signaling, and to establish uniform or other standards of construction and equipment, and to require the performance of any other acts which the health or safety of its employees, passengers, customers or the public may demand, provided, however, that the department of transportation shall have jurisdiction over safety functions of public utilities as granted by Subsections 54-4-15(1) through (3) and in Title 72, Transportation Code.

**54-4-18 Electric, gas, and water service.** The commission shall have power, after a hearing, to ascertain and fix just and reasonable standards, classifications, regulations, practices, measurements or service to be furnished, imposed, observed and followed by all electrical, gas and water corporations; to ascertain and fix adequate and serviceable standards for the measurement of quantity, quality, pressure, initial voltage or other conditions pertaining to the supply of the product, commodity or service furnished or rendered by any such public utility; to prescribe reasonable regulations for the examination and testing of such products, commodity or service, and for the measurement thereof; to establish reasonable rules, regulations, specifications and standards to secure the accuracy of all meters and appliances for measurements; and to provide for the examination and testing of any and all appliances used for the measurement of any product, commodity or service of any such public utility.  
No Change Since 1953.

#### **54-24-203 Wildland fire protection plan for an electric cooperative.**

- (1) An electric cooperative shall prepare a wildland fire protection plan in accordance with the requirements of this chapter.
- (2) A wildland fire protection plan under Subsection [\(1\)](#) shall include:

- (a) a description of areas within the service territory of the electric cooperative that may be subject to a heightened risk of wildland fire;
  - (b) a description of the procedures, standards, and time frames that the electric cooperative will use to inspect and operate its infrastructure;
  - (c) a description of the procedures and standards that the electric cooperative will use to perform vegetation management;
  - (d) a description of proposed modifications or upgrades to facilities and preventative programs that the electric cooperative will implement to reduce the risk of its electric facilities initiating a wildland fire;
  - (e) a description of procedures for de-energizing power lines and disabling reclosers to mitigate potential wildland fires, taking into consideration:
    - (i) the ability of the electric cooperative to reasonably access the proposed power line to be de-energized;
    - (ii) the balance of the risk of wildland fire with the need for continued supply of electricity to a community; and
    - (iii) any potential impact to public safety, first responders, and health and communication infrastructure;
  - (f) a description of the procedures the electric cooperative intends to use to restore its electrical system in the event of a wildland fire; and
  - (g) a description of potential consultation, if applicable, with state or local wildland fire protection plans.
- (3) (a) An electric cooperative shall submit the wildland fire protection plan described in this section to its governing authority:
- (i) on or before June 1, 2020; and
  - (ii) on or before October 1 of every third year after calendar year 2020.
- (b) The governing authority shall:
- (i) review the plan submitted under Subsection [\(3\)\(a\)](#); and
  - (ii) consider input from:
    - (A) the Division of Forestry, Fire, and State Lands created in Section [65A-1-4](#);
    - (B) any other appropriate federal, state, or local entity that chooses to provide input; and
    - (C) other interested persons who choose to provide input.
- (c) The governing authority shall approve a wildland fire protection plan submitted under Subsection [\(3\)\(a\)](#) if the plan:

- (i) is reasonable and in the interest of the electric cooperative members; and
    - (ii) appropriately balances the costs of implementing the plan with the risk of a potential wildland fire.
  - (d) An electric cooperative shall file with the commission a wildland fire protection plan submitted and approved under this section.
- (4) An electric cooperative shall:
- (a) file with its governing authority an annual report detailing the electric cooperative's compliance with the wildland fire protection plan; and
  - (b) file with the commission a copy of the annual compliance report described in Subsection [\(4\)\(a\)](#).
- (5) The commission shall make available for public inspection:
- (a) a wildland fire protection plan filed under Subsection [\(3\)\(d\)](#); and
  - (b) an annual compliance report filed under Subsection [\(4\)\(b\)](#).

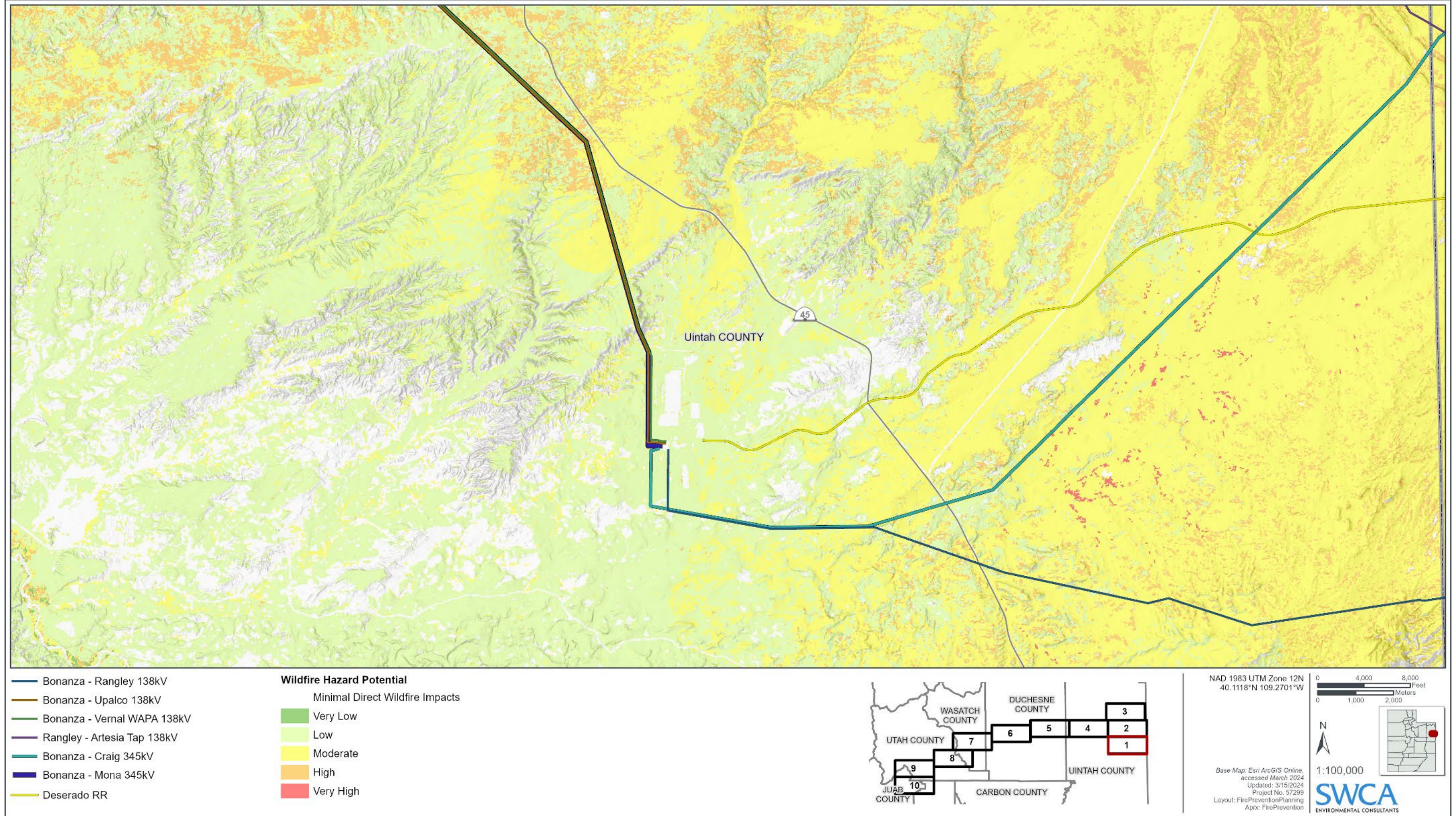
#### **65A-3-4 Liability for causing wildland fires**

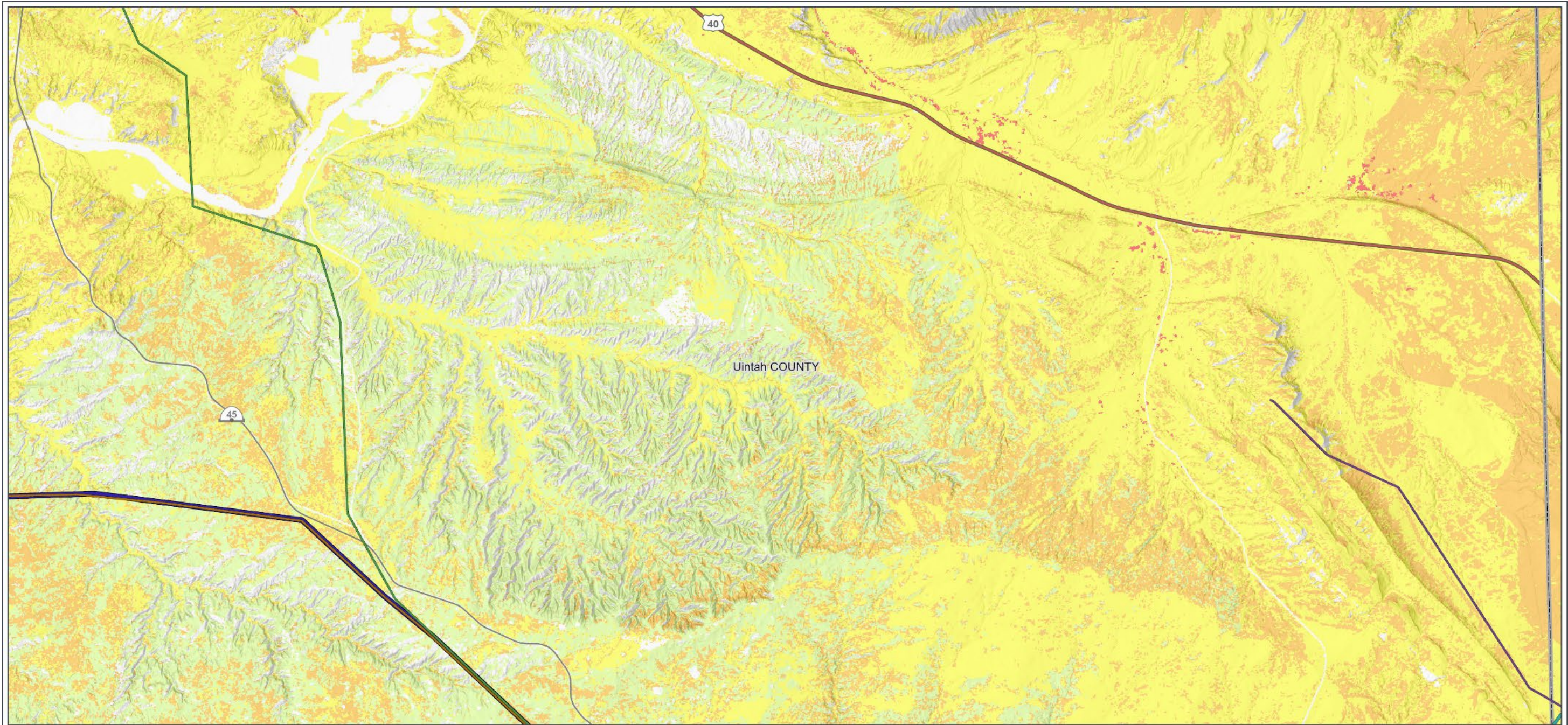
- (1) As used in this section:
- (a) "Electric cooperative" means the same as that term is defined in Section [54-24-102](#).
  - (b) "Electrical transmission wildland fire protection plan" means a wildland fire protection plan, as defined in Section [54-24-102](#), that is:
    - (i) prepared and submitted by a qualified utility and approved as provided in Section [54-24-201](#); or
    - (ii) prepared and submitted by an electric cooperative and approved as provided in Section [54-24-203](#).
  - (c) "Qualified utility" means the same as that term is defined in Section [54-17-801](#).
- (2) (a) Except as provided in Subsection [\(3\)](#), a person who negligently, recklessly, or intentionally causes or spreads a wildland fire shall be liable for the cost of suppressing that wildland fire, regardless of whether the fire begins on:
- (i) private land;
  - (ii) land owned by the state;
  - (iii) federal land; or
  - (iv) tribal land.

- (b) The conduct described in Subsection [\(2\)\(a\)](#) includes any negligent, reckless, or intentional conduct, and is not limited to conduct described in Section [65A-3-2](#).
- (3) In an action under this section to recover for property damage resulting from a wildland fire or to recover the cost of fire suppression resulting from a wildland fire, a qualified utility or electric cooperative may not be considered to have negligently caused a wildland fire if:
- (a) (i) the electrical transmission wildland fire protection plan of the qualified utility or electric cooperative identifies and addresses the cause of the wildland fire for fire mitigation purposes; and
  - (ii) at the origin of the wildland fire, the qualified utility or electric cooperative has completed the fire mitigation work identified in the electrical transmission wildland fire protection plan, including:
    - (A) inspection, maintenance, and repair activities;
    - (B) modifications or upgrades to facilities or construction of new facilities;
    - (C) vegetation management work; and
    - (D) preventative programs; or
  - (b) (i) the qualified utility or electric cooperative is denied or delayed access to a right-of-way on land owned by the state, a federal agency, or a tribal government after the qualified utility or electric cooperative requests access to the right-of-way to perform vegetation management or fire mitigation work in accordance with an electrical transmission wildland fire protection plan; and
  - (ii) the electrical transmission wildland fire protection plan identifies and addresses the cause of the wildland fire for fire mitigation purposes.
- (4) A person who incurs costs to suppress a wildland fire may bring an action under this section to recover those costs.
- (5) (a) A property owner who suffers damages resulting from a wildland fire may bring an action under this section to recover those damages.
- (b) An award for damages to real property resulting from a wildland fire, including the loss of vegetation, shall be the lesser of:
- (i) the cost to restore the real property to its pre-wildland fire condition; or
  - (ii) the difference between:
    - (A) the fair market value of the real property before the wildland fire; and
    - (B) the fair market value of the real property after the wildland fire.

(6) A person who suffers damage from a wildland fire may pursue all other legal remedies in addition to seeking damages under Subsection [\(4\)](#) or [\(5\)](#).

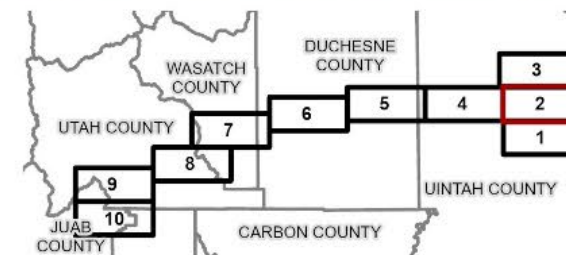
# Appendix C: Maps of Wildfire Hazard Potential



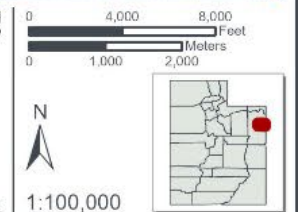


- Bonanza - Upalco 138kV
- Bonanza - Vernal WAPA 138kV
- Rangley - Artesia Tap 138kV
- Bonanza - Craig 345kV
- Bonanza - Mona 345kV

- Wildfire Hazard Potential**
- Minimal Direct Wildfire Impacts
  - Very Low
  - Low
  - Moderate
  - High
  - Very High

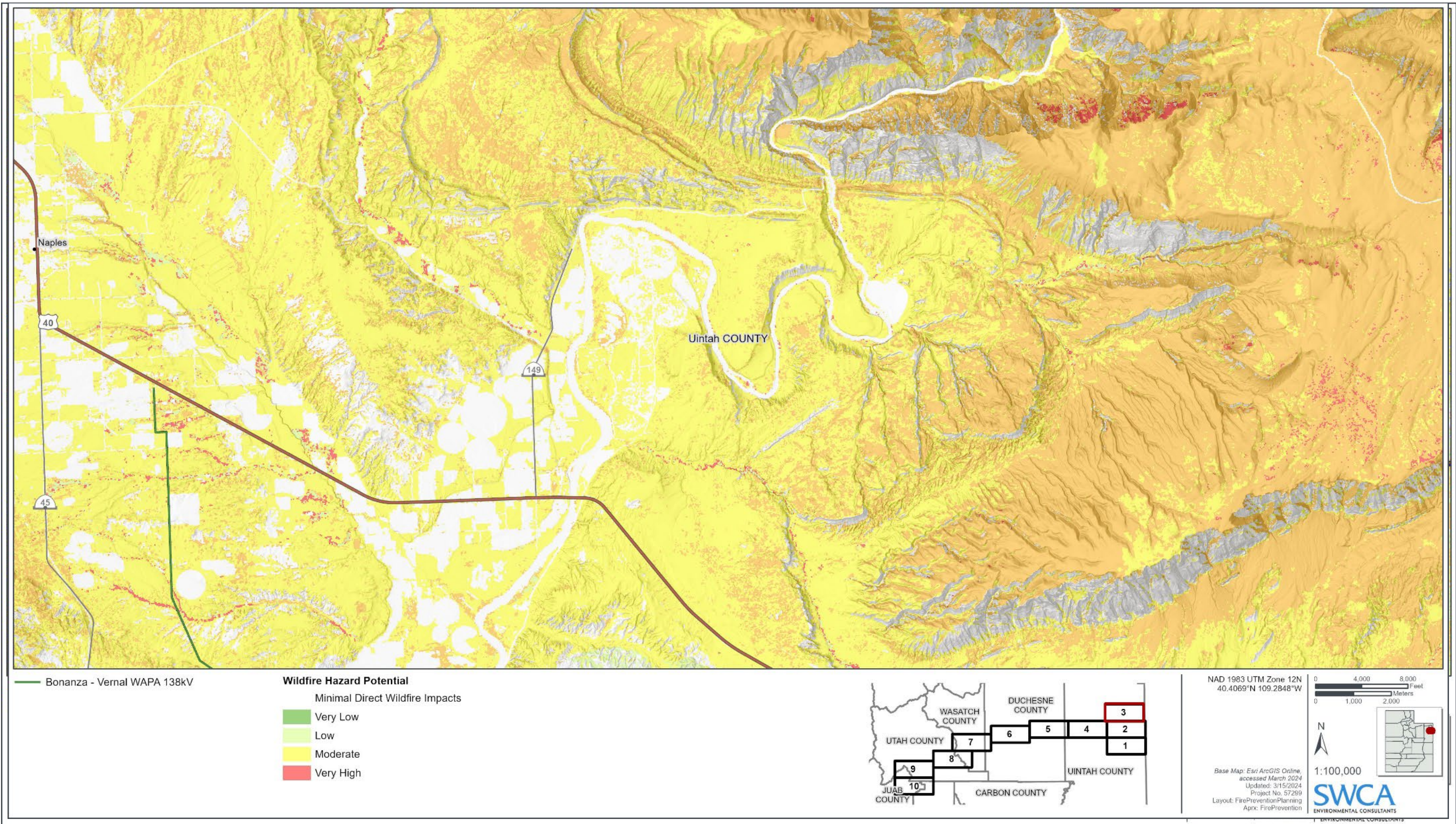


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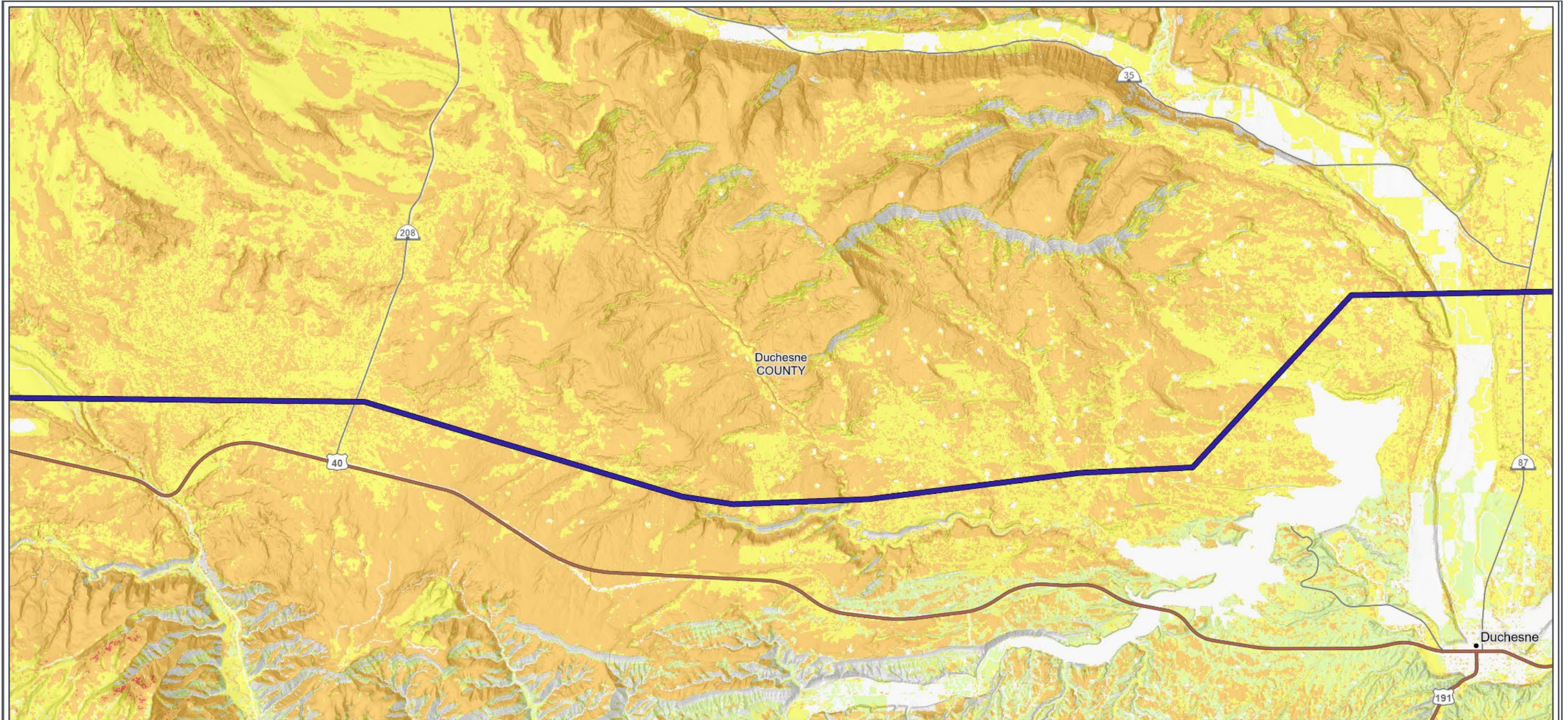


Base Map: Esri ArcGIS Online,  
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Updated: 3/15/2024  
Project No. 57299  
Layout: FirePreventionPlanning  
Aprx: FirePrevention

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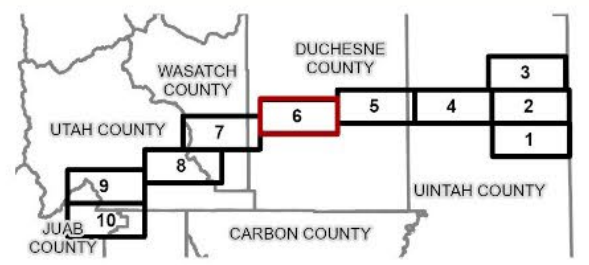




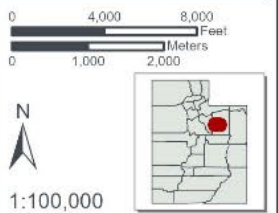
■ Bonanza - Mona 345kV

**Wildfire Hazard Potential**

- Minimal Direct Wildfire Impacts
- Very Low
- Low
- Moderate
- Very High

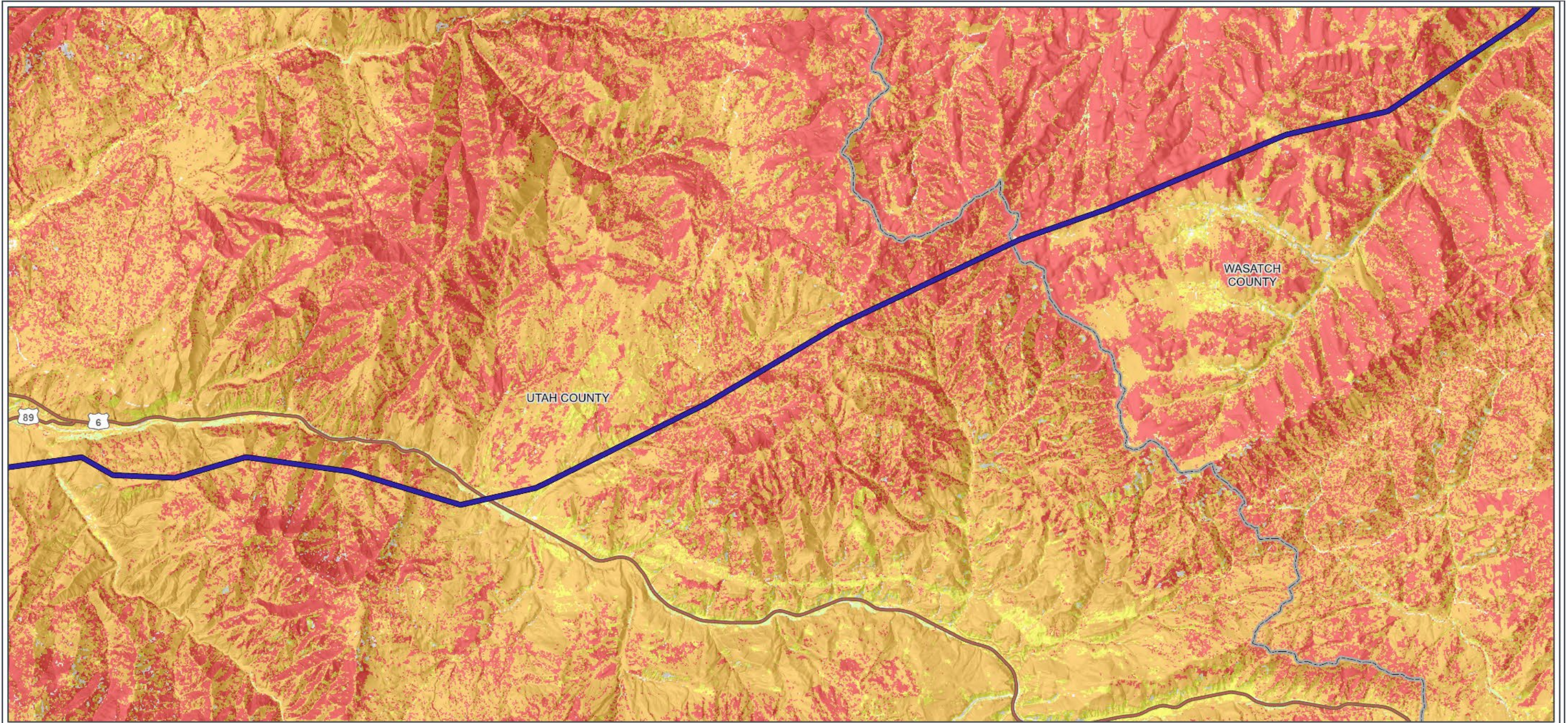


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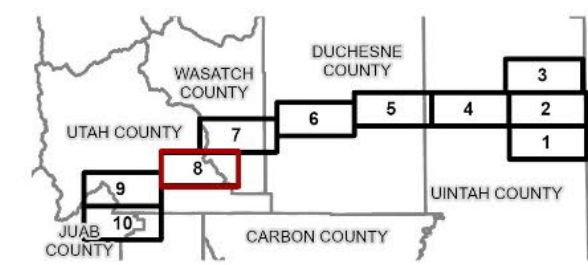


■ Bonanza - Mona 345kV

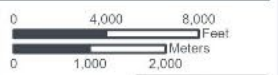
**Wildfire Hazard Potential**

Minimal Direct Wildfire Impacts

- Very Low
- Low
- Moderate
- Very High

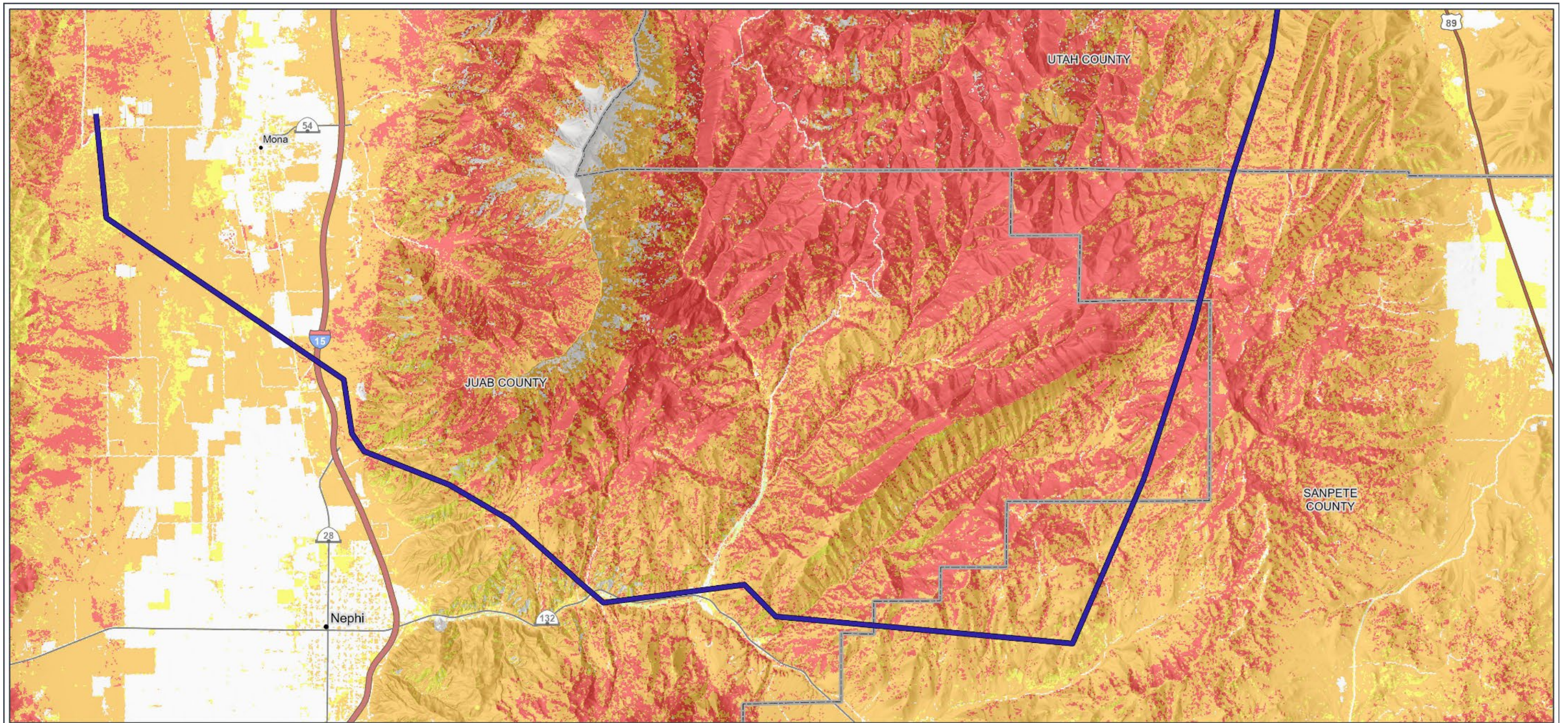


NAD 1983 UTM Zone 12N  
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**SWCA**  
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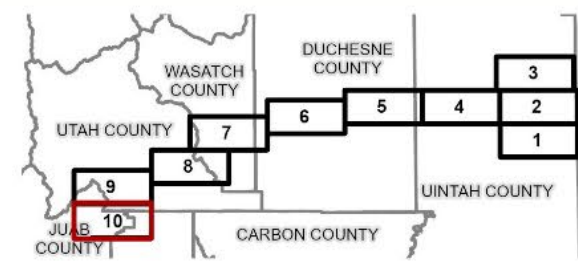


■ Bonanza - Mona 345kV

**Wildfire Hazard Potential**

Minimal Direct Wildfire Impacts

- Very Low
- Low
- Moderate
- Very High



NAD 1983 UTM Zone 12N  
39.7692°N 111.7072°W

0 4,000 8,000  
0 1,000 2,000  
Feet  
Meters

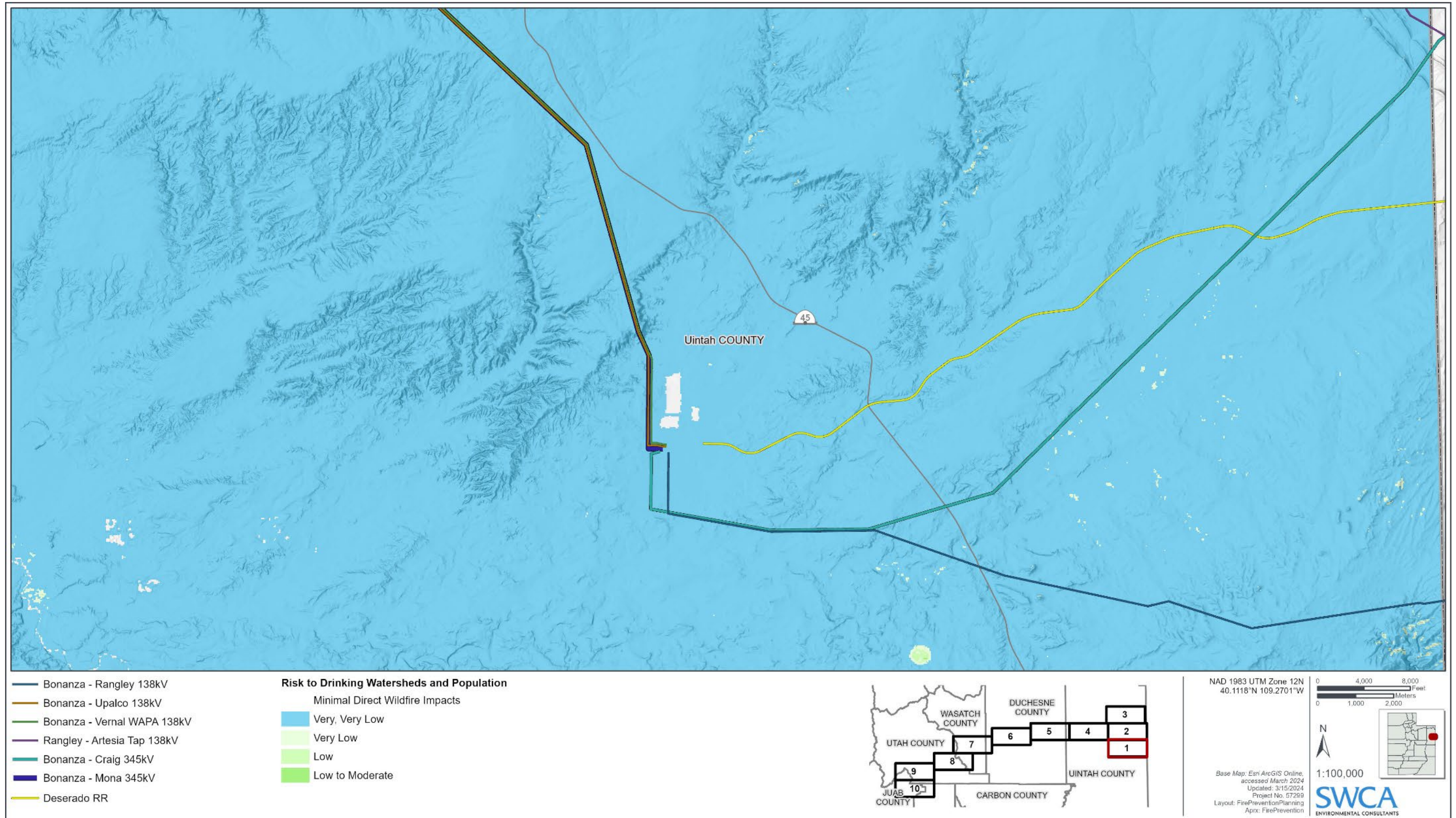
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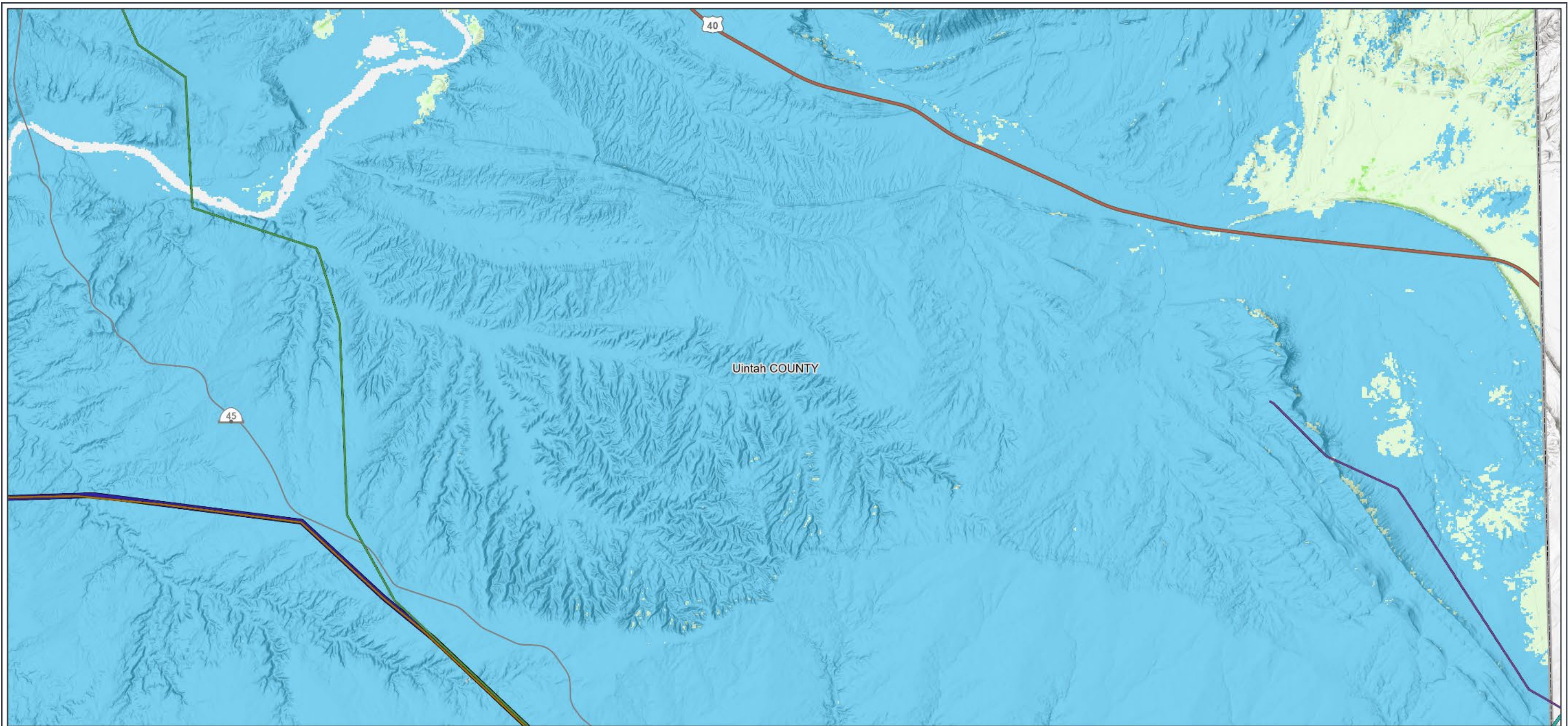
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# Appendix D: Maps of Watershed and Population Risk Potential



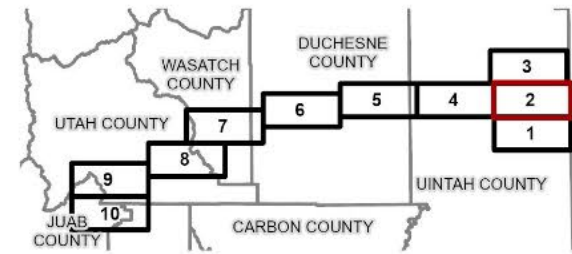


- Bonanza - Upalco 138kV
- Bonanza - Vernal WAPA 138kV
- Rangley - Artesia Tap 138kV
- Bonanza - Craig 345kV
- Bonanza - Mona 345kV

**Risk to Drinking Watersheds and Population**

Minimal Direct Wildfire Impacts

- Very, Very Low
- Very Low
- Low
- Low to Moderate



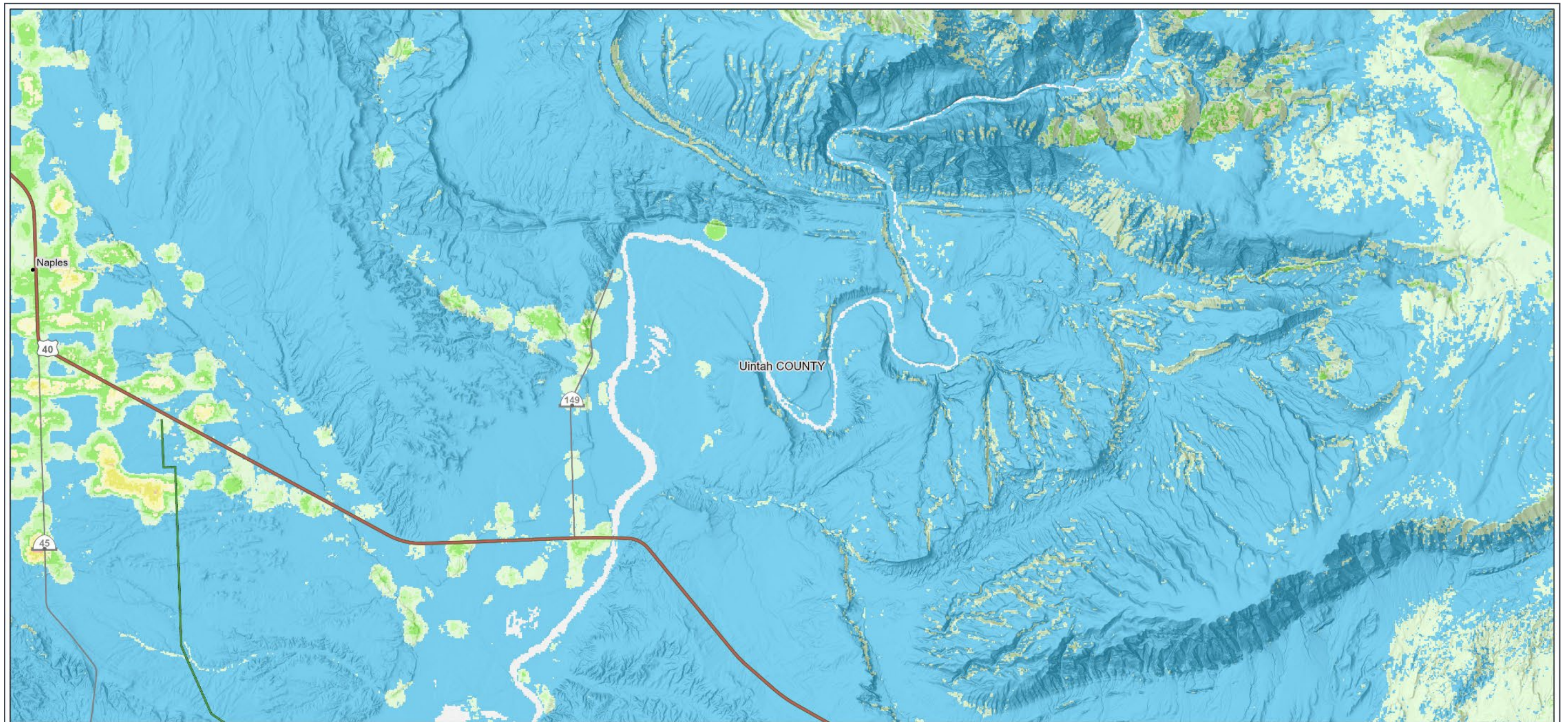
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40.2592°N 109.268°W

0 4,000 8,000 Feet  
0 1,000 2,000 Meters

1:100,000

Base Map: Esri ArcGIS Online, accessed March 2024  
Updated: 3/15/2024  
Project No. 57299  
Layout: FirePreventionPlanning  
Aprx: FirePrevention

**SWCA**  
ENVIRONMENTAL CONSULTANTS

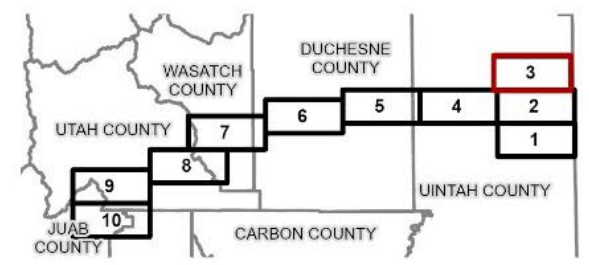


Bonanza - Vernal WAPA 138kV

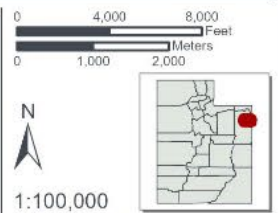
**Risk to Drinking Watersheds and Population**

- Minimal Direct Wildfire Impacts
- Very, Very Low
- Very Low
- Low
- Low to Moderate
- Moderate

- Moderate to High
- High
- Very High

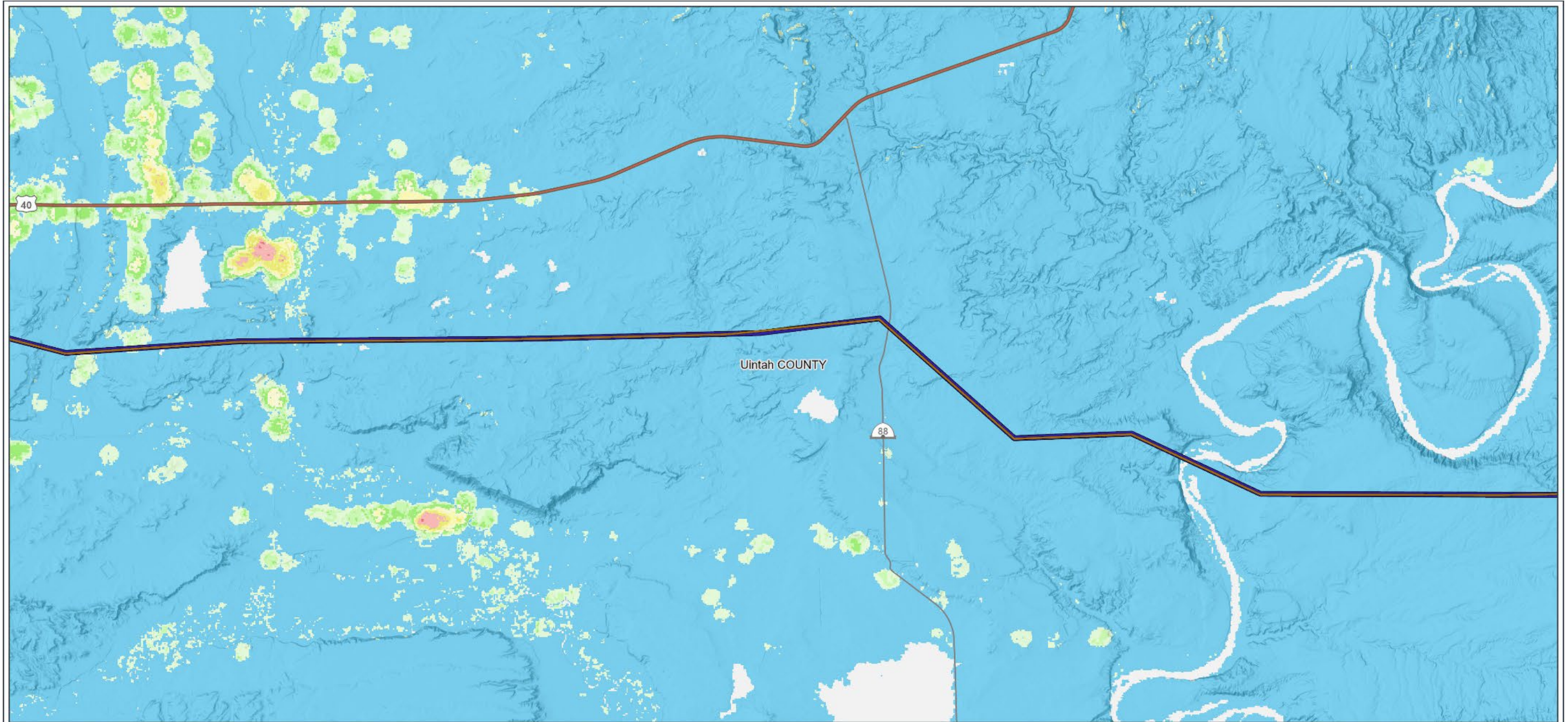


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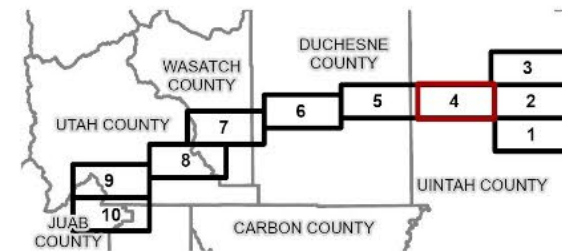


— Bonanza - Upalco 138kV  
 — Bonanza - Mona 345kV

**Risk to Drinking Watersheds and Population**

- Minimal Direct Wildfire Impacts
- Very, Very Low
- Very Low
- Low
- Low to Moderate
- Moderate

- Moderate to High
- High
- Very High
- Extreme



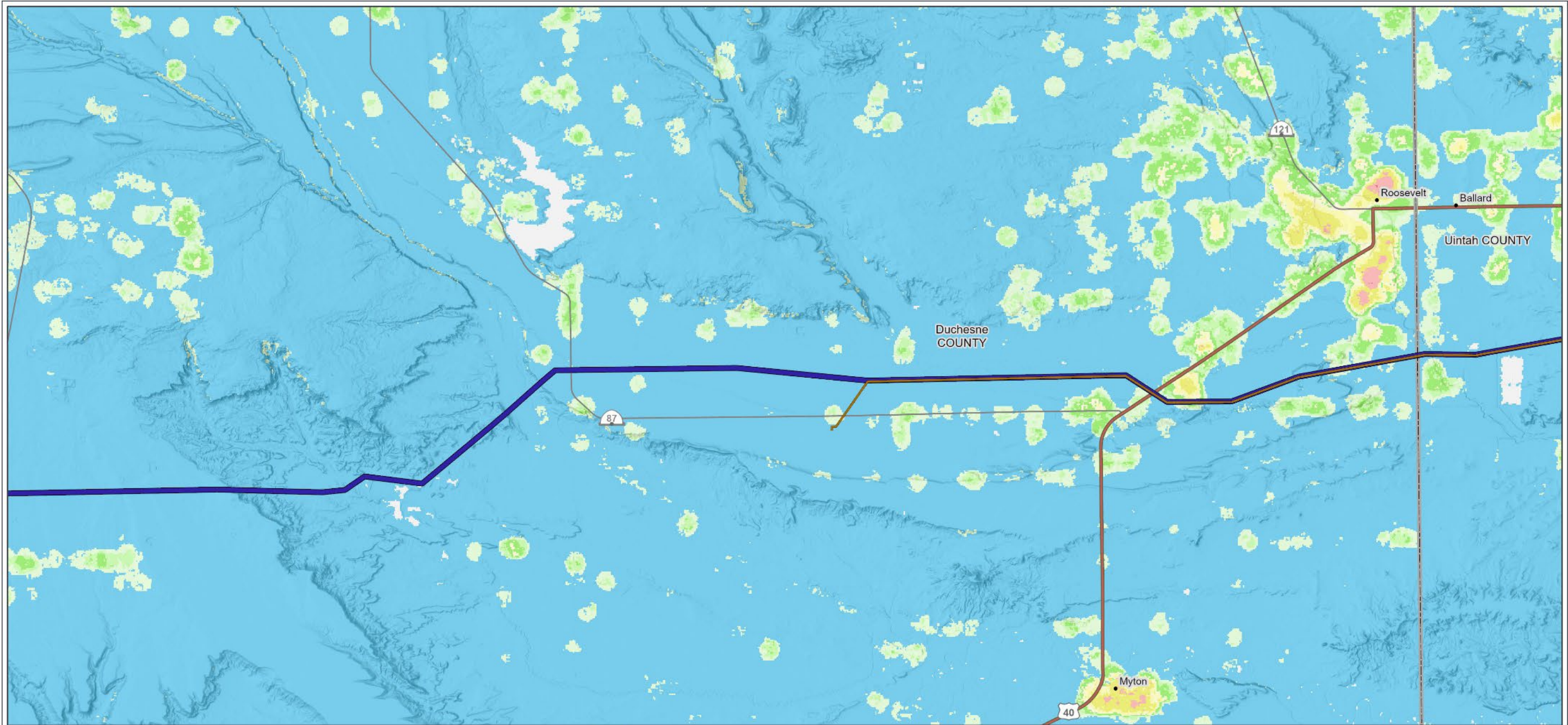
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 Updated: 3/15/2024  
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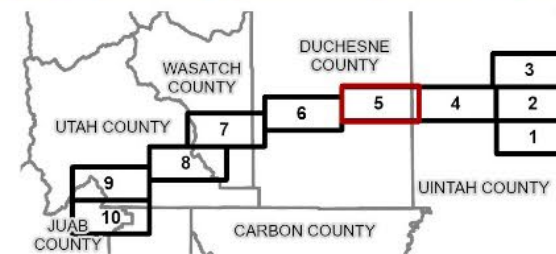


— Bonanza - Upalco 138kV  
 — Bonanza - Mona 345kV

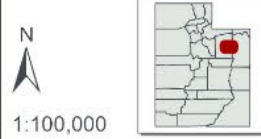
**Risk to Drinking Watersheds and Population**

- Minimal Direct Wildfire Impacts
- Very, Very Low
- Very Low
- Low
- Low to Moderate
- Moderate

- Moderate to High
- High
- Very High
- Extreme



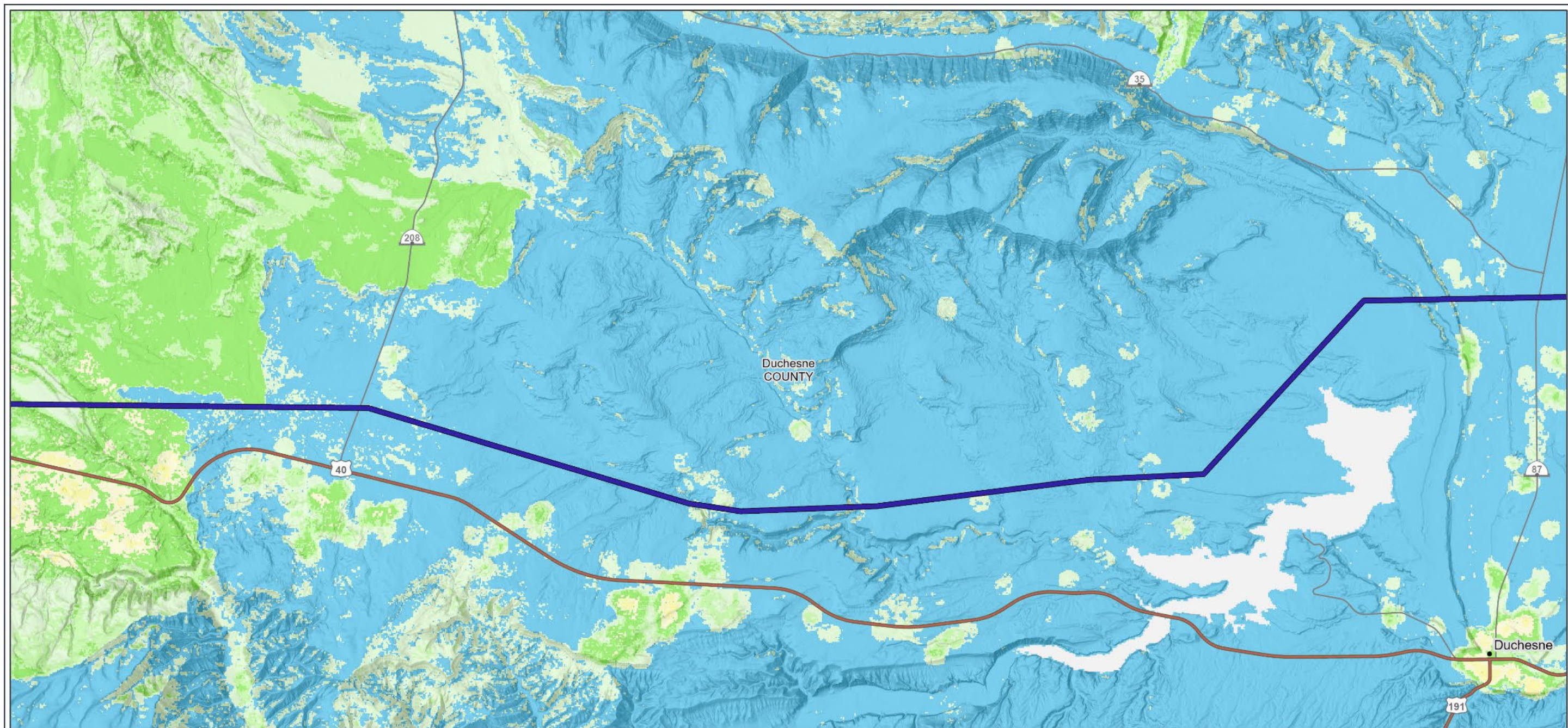
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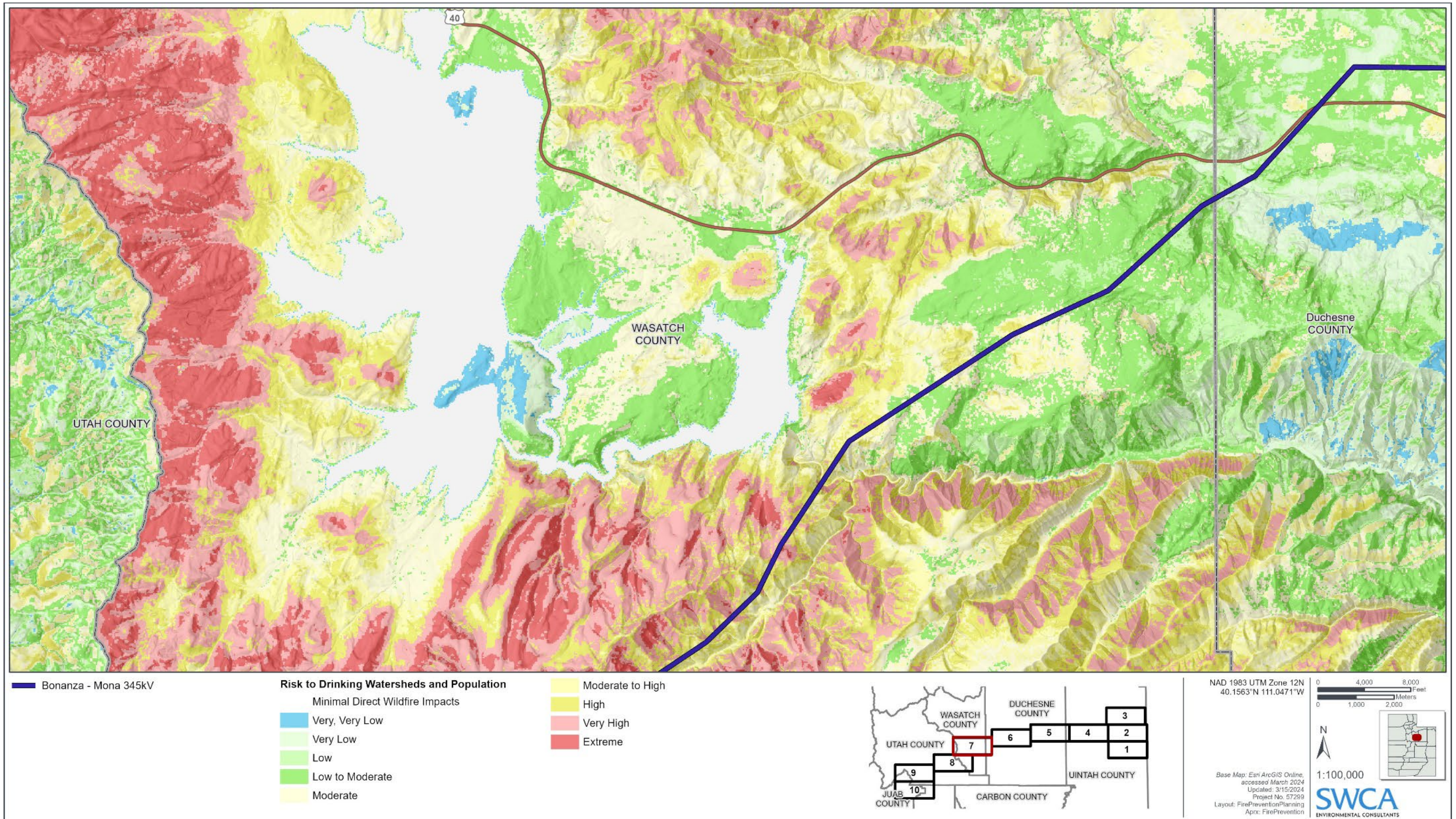
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 Aprx: FirePrevention

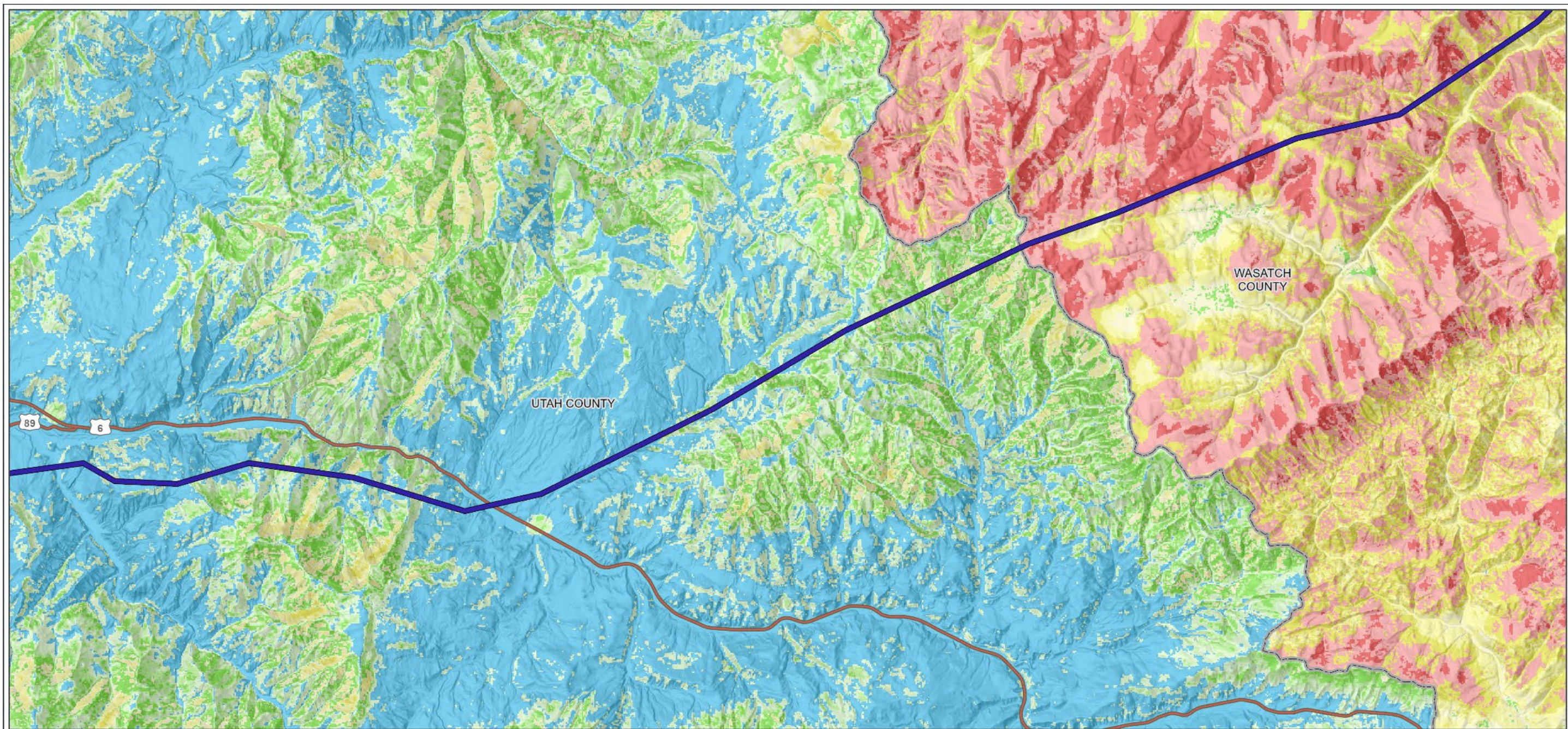
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**SWCA**  
 ENVIRONMENTAL CONSULTANTS





<p><b>Bonanza - Mona 345kV</b></p>	<p><b>Risk to Drinking Watersheds and Population</b></p> <p>Minimal Direct Wildfire Impacts</p> <ul style="list-style-type: none"> <li> Very, Very Low</li> <li> Very Low</li> <li> Low</li> <li> Low to Moderate</li> <li> Moderate</li> </ul>	<ul style="list-style-type: none"> <li> Moderate to High</li> <li> High</li> </ul>		<p>NAD 1983 UTM Zone 12N 40.2276°N 110.6026°W</p> <p>0 4,000 8,000 Feet 0 1,000 2,000 Meters</p> <p>1:100,000</p> <p>Base Map: Esri ArcGIS Online, accessed March 2024 Updated: 3/15/2024 Project No. 57299 Layout: FirePreventionPlanning Aprx: FirePrevention</p> <p><b>SWCA</b> ENVIRONMENTAL CONSULTANTS</p>
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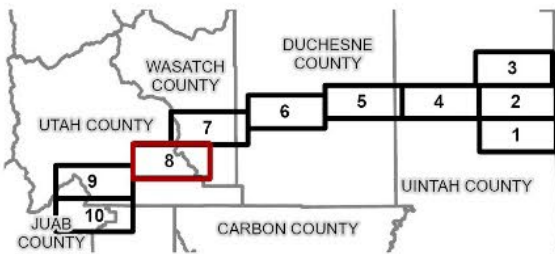


■ Bonanza - Mona 345kV

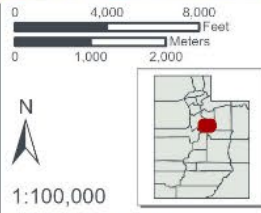
**Risk to Drinking Watersheds and Population**

- Minimal Direct Wildfire Impacts
- Very, Very Low
- Very Low
- Low
- Low to Moderate
- Moderate

- Moderate to High
- High
- Very High
- Extreme

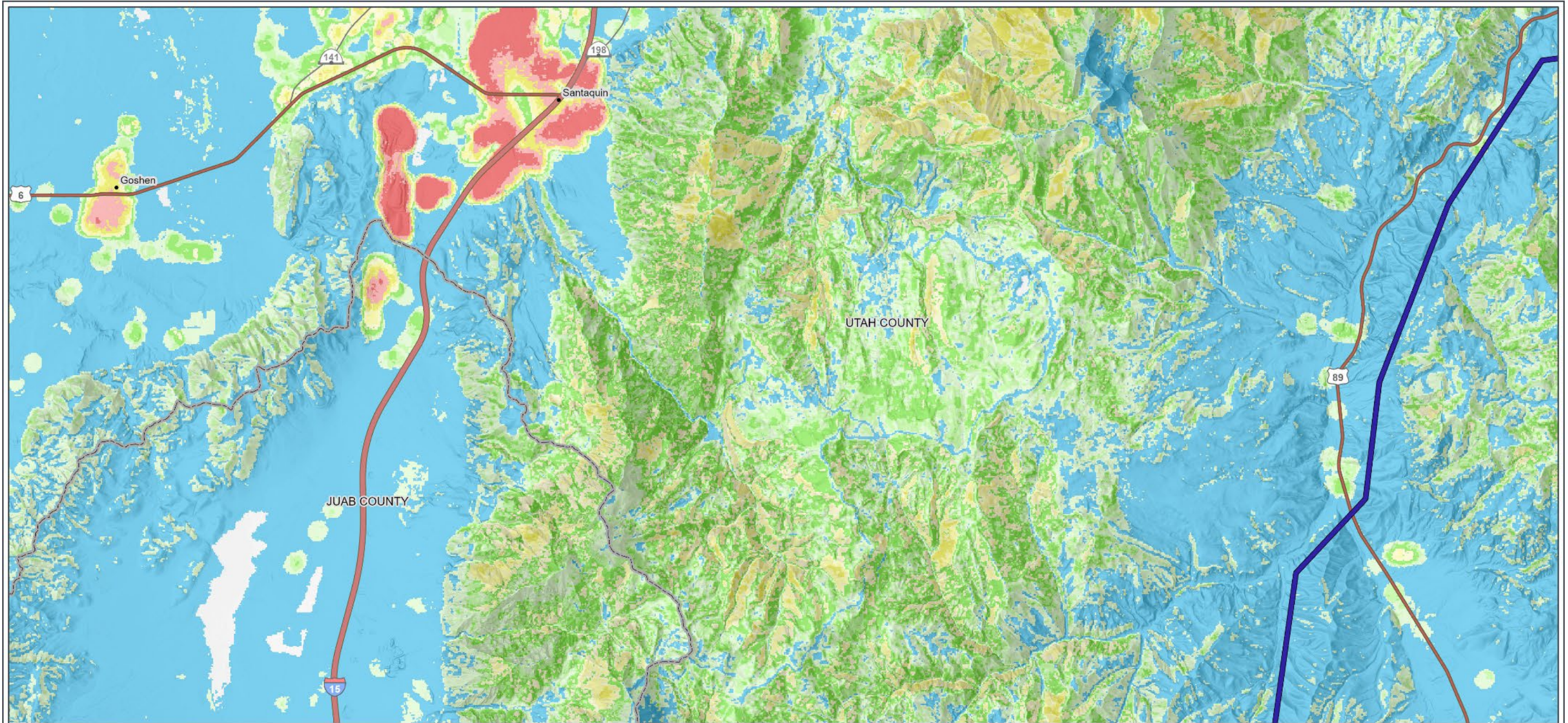


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Updated: 3/15/2024  
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**SWCA**  
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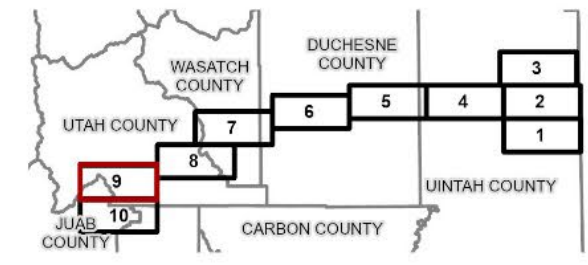


■ Bonanza - Mona 345kV

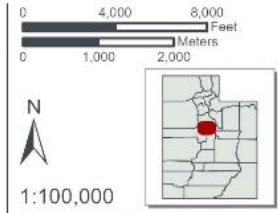
**Risk to Drinking Watersheds and Population**

- Minimal Direct Wildfire Impacts
- Very, Very Low
- Very Low
- Low
- Low to Moderate
- Moderate

- Moderate to High
- High
- Very High
- Extreme

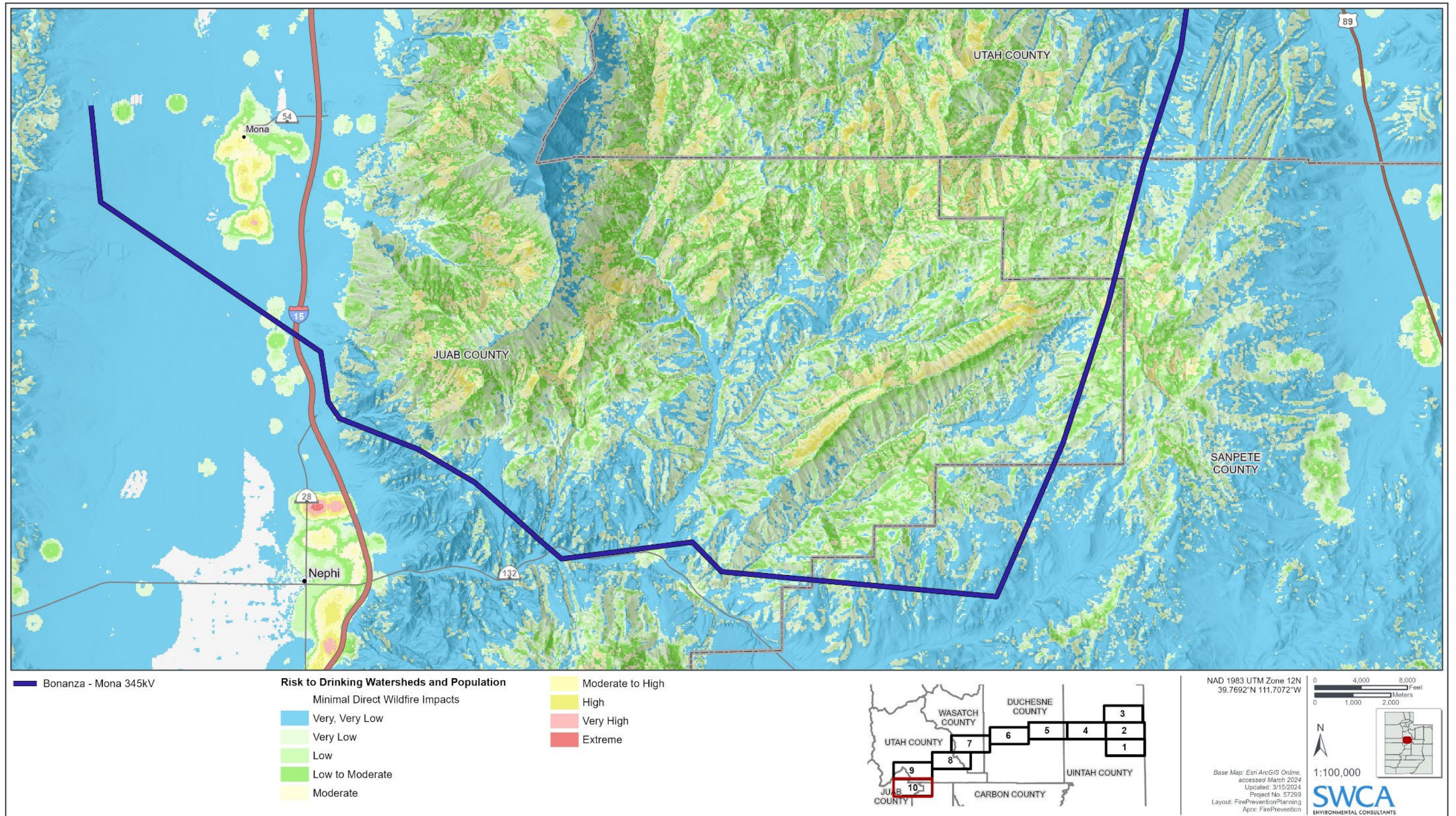


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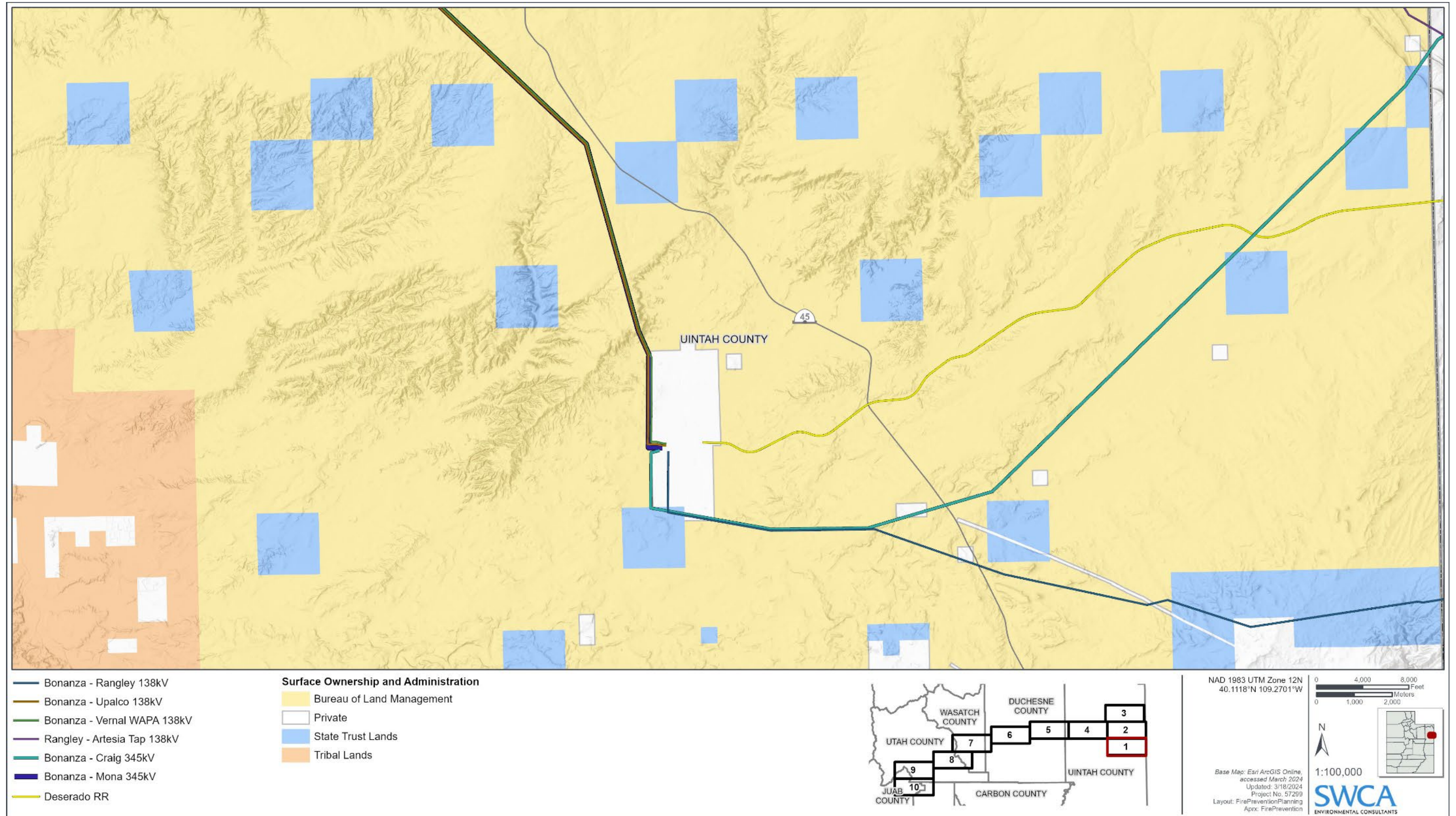


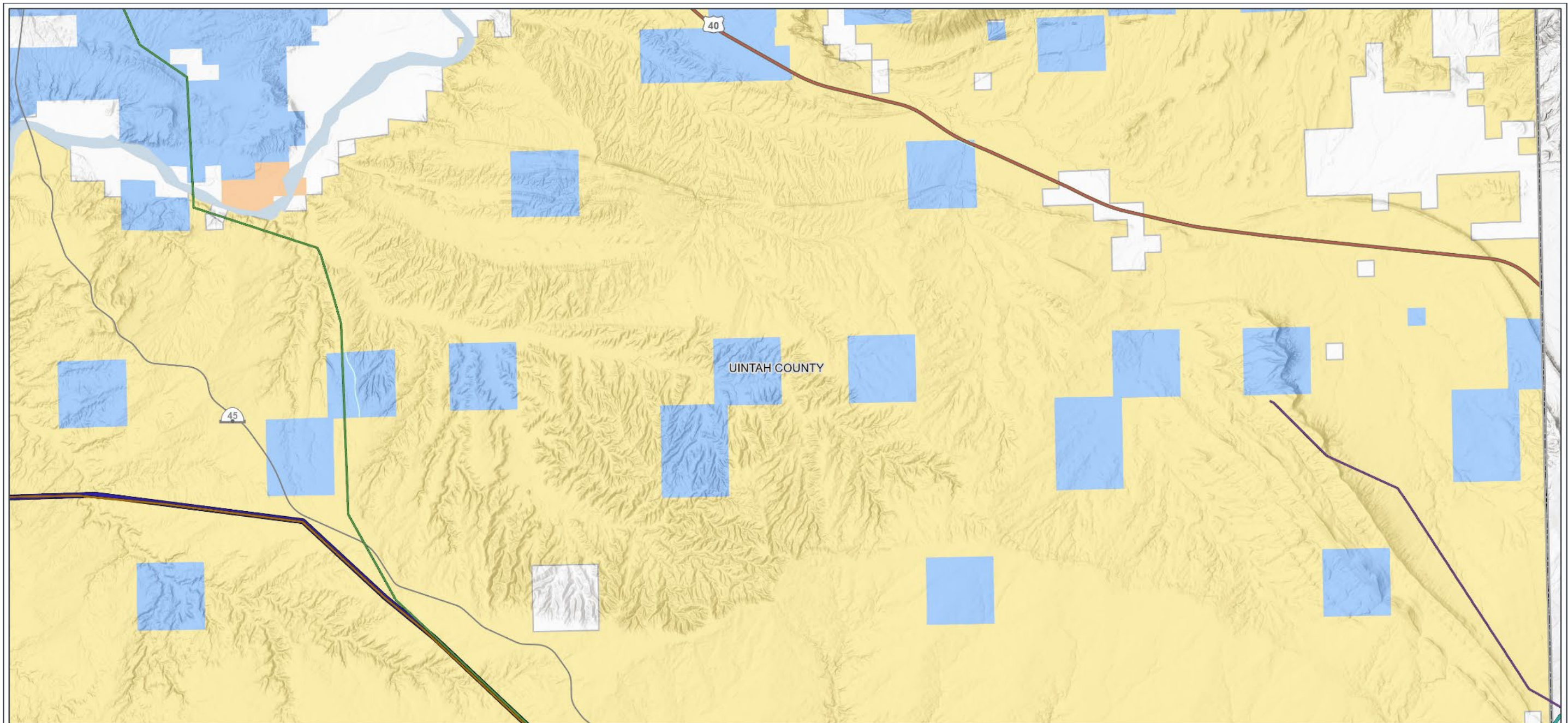
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Project No. 57299  
Layout: FirePreventionPlanning  
Aprx: FirePrevention

1:100,000  
**SWCA**  
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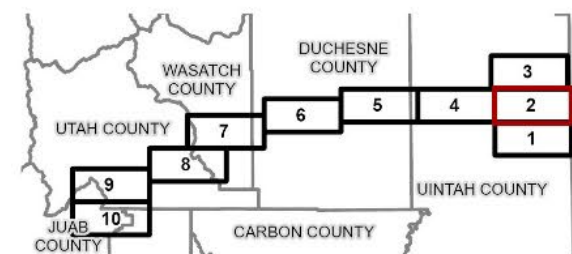
# Appendix E: Maps of Surface Land Management





- Bonanza - Upalco 138kV
- Bonanza - Vernal WAPA 138kV
- Rangley - Artesia Tap 138kV
- Bonanza - Craig 345kV
- Bonanza - Mona 345kV

- Surface Ownership and Administration**
- Bureau of Land Management
  - Private
  - State Trust Lands
  - State Sovereign Land
  - Other State
  - Tribal Lands



NAD 1983 UTM Zone 12N  
40.2592°N 109.268°W

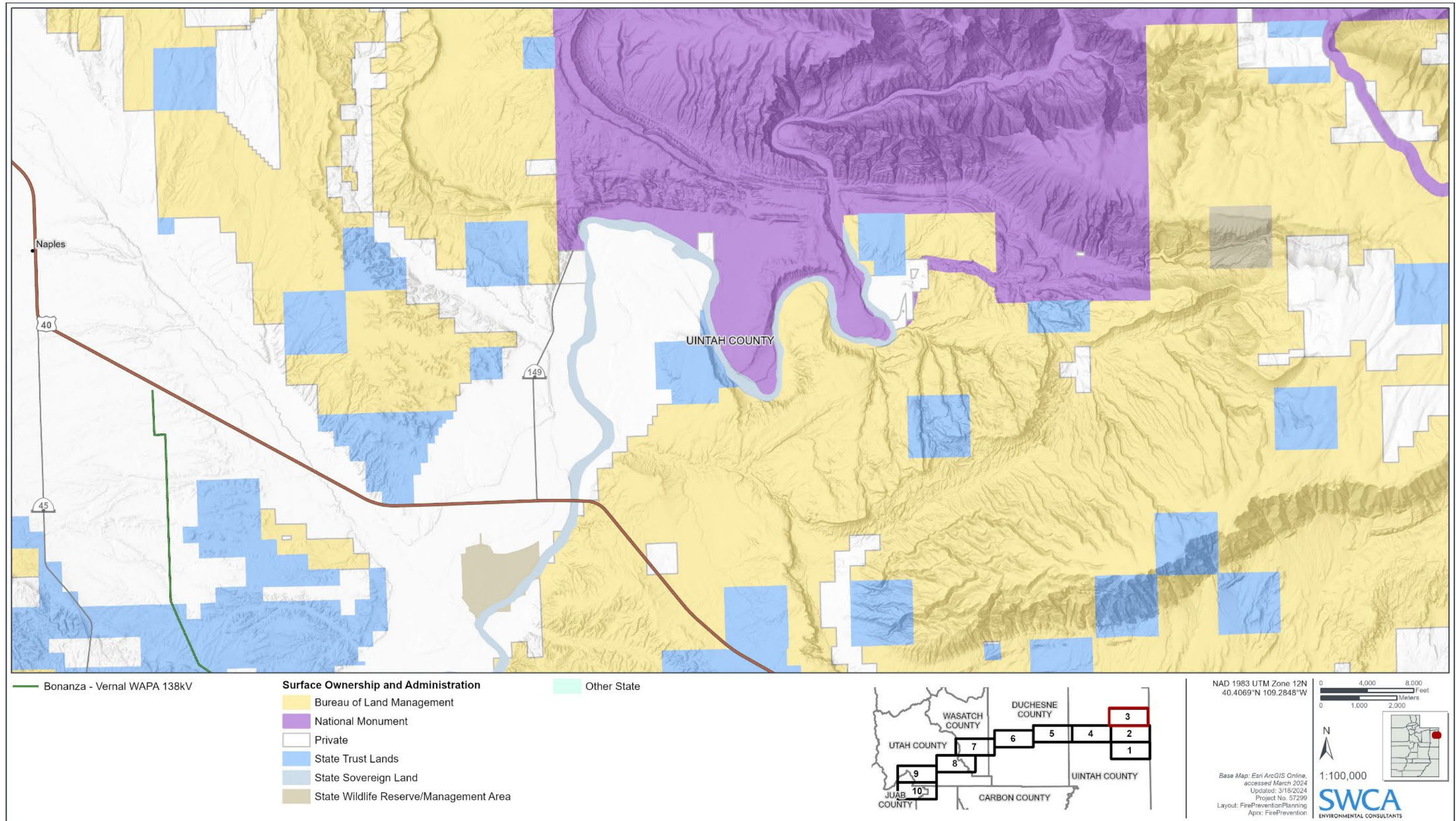
0 4,000 8,000  
0 1,000 2,000  
Meters Feet

N

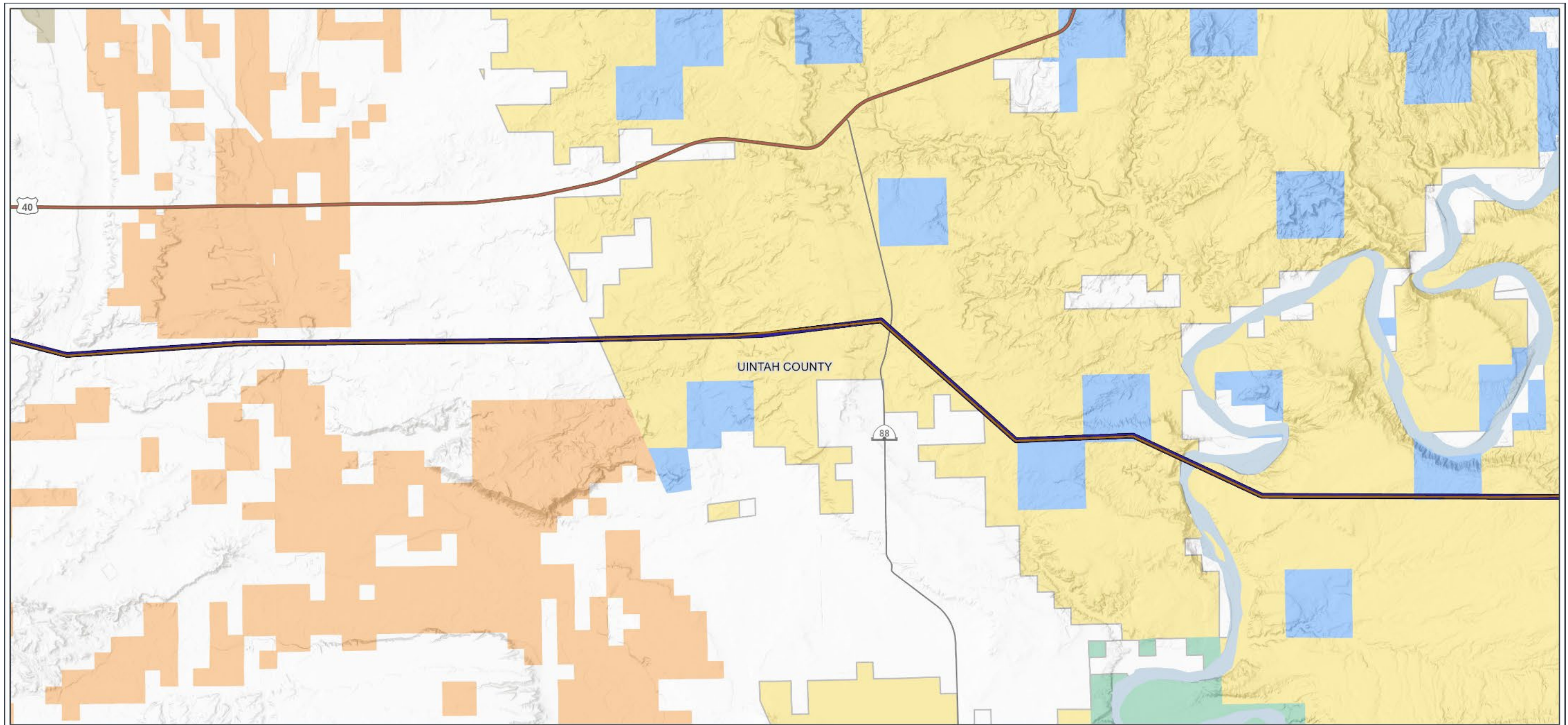
1:100,000

Base Map: Esri ArcGIS Online, accessed March 2024  
Updated: 3/18/2024  
Project No. 57299  
Layout: FirePreventionPlanning  
Aprx: FirePrevention

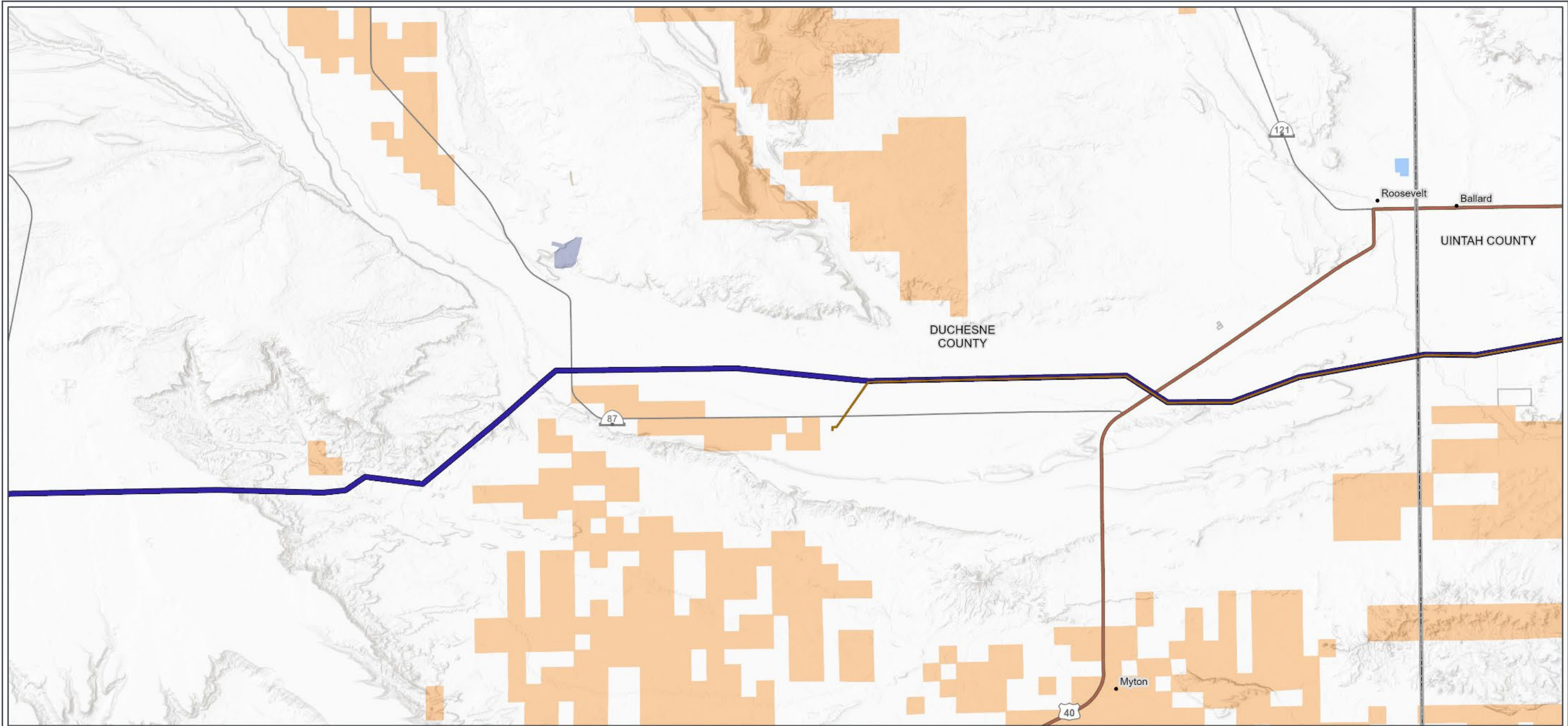
**SWCA**  
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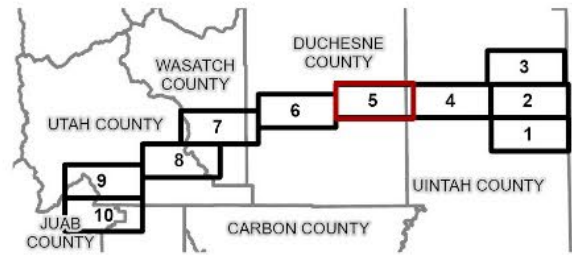
<ul style="list-style-type: none"> <li><span style="color: brown;">—</span> Bonanza - Upalco 138kV</li> <li><span style="color: blue;">—</span> Bonanza - Mona 345kV</li> </ul>	<p><b>Surface Ownership and Administration</b></p> <ul style="list-style-type: none"> <li><span style="background-color: yellow; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Bureau of Land Management</li> <li><span style="background-color: lightgreen; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> National Wildlife Refuge</li> <li><span style="background-color: white; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Private</li> <li><span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> State Trust Lands</li> <li><span style="background-color: lightgrey; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> State Sovereign Land</li> <li><span style="background-color: tan; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> State Wildlife Reserve/Management Area</li> </ul>	<ul style="list-style-type: none"> <li><span style="background-color: orange; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Tribal Lands</li> </ul>		<p>NAD 1983 UTM Zone 12N 40.265°N 109.7127°W</p> <p>1:100,000</p> <p>SWCA ENVIRONMENTAL CONSULTANTS</p>
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— Bonanza - Upalco 138kV  
— Bonanza - Mona 345kV

**Surface Ownership and Administration**

- Private
- State Trust Lands
- State Parks and Recreation
- State Wildlife Reserve/Management Area
- Tribal Lands



NAD 1983 UTM Zone 12N  
 40.2691°N 110.1575°W

0 4,000 8,000  
 0 1,000 2,000  
 Feet  
 Meters

N  
 1:100,000

Base Map: Esri ArcGIS Online, accessed March 2024  
 Updated: 3/18/2024  
 Project No. 57299  
 Layout: FirePreventionPlanning  
 Aprx: FirePrevention

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