



SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

MARGARET W. BUSSE
Executive Director

CHRIS PARKER
Division Director

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Doug Wheelwright, Utility Technical Consultant Supervisor
Jonathan Lee, Utility Analyst

Date: April 23, 2024

Re: **Docket No. 23-506-03**, Deseret Power Electric Cooperative Wildland Fire Protection Plan.

Recommendation (Acknowledge)

The Division of Public Utilities (“Division”) recommends the Public Service Commission (“Commission”) acknowledge Deseret Power Electric Cooperative’s March 26, 2024, filing as complying with Utah Code § 54-24-203 (1-3).

Issue

On March 26, 2024, Deseret Power Electric Cooperative (“Company” or “Deseret Power”) filed its Wildland Fire Protection Plan (“WFPP”). On the same date, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations. The Commission asked the Division to report back by April 25, 2024. This memorandum is the Division’s response to the Action Request.

Discussion

Deseret Power is a non-profit rural electric distribution cooperative. Utah Code § 54-24-203 (1-3) requires electric cooperatives to prepare a Wildland Fire Protection Plan in June 2020

Division of Public Utilities

Heber M. Wells Building • 160 East 300 South • P.O. Box 146751 Salt Lake City, UT 84114-6741
www.dpu.utah.gov • telephone (801) 530-7622 • toll-free in Utah (877) 874-0904 • fax (801) 530-6512

and every third year thereafter. The WFPP submitted by Deseret Power includes content relating to wildfire risk analysis, wildfire prevention strategies and protocols, community outreach and education, etc. The purpose of this filing was to comply with Utah code, protect the public, minimize the chance of the cooperative's power lines starting wildfires, and speed up the recovery from any wildfires that may occur. On December 27, 2023, Deseret Power informed the Commission that they had been actively updating the 2023 WFPP presented to the board of trustees on September 29, 2023. After Deseret Power submitted the WFPP to the board of trustees, the Utah Division of Forestry, Fire and State Lands ("Division of Forestry"), comments were provided on December 12, 2023. The feedback that the Company received necessitated that Deseret Power take additional time to fully review the 2023 WFPP. As a result, Deseret Power requested an extension from its governing authority to approve the WFPP, pushing the deadline back to March 2024. On March 26, 2024, the Division received a memo from Deseret Power stating that the WFPP had been presented to the board of trustees on March 21, 2024, and was approved by the board of trustees that day.

The Division's review of the WFPP included a comparison of the 2023 with the 2020 WFPP that was filed in 2020 and updated on July 19, 2021. The 2023 WFPP appears more detailed, robust, and comprehensive, and the review shows that it had minimal foundational changes. The purpose of the WFPP is to mitigate the risk of fire and Deseret Power is committed to taking practical actions to prevent the devastation that could occur from a wildfire. The WFPP is a living document that will receive regular reassessment as projects and initiatives are completed. Per Utah Code Ann. 54-24-203(4), the WFPP is reviewed on an annual basis for compliance and is presented to the governing authority when there are new actions or practices put into place. This WFPP does not constitute the annual compliance filing.

The main sections of the WFPP that are addressed are:¹

1. Overview of Utility's Fire Prevention Strategies
2. Utility Asset Overview

¹ Wildland Fire Protection Plan, Page i,ii

3. Risk Analysis and Risk Drivers
4. Wildfire Prevention Strategy and Programs
5. Emergency Response
6. Plan Monitoring

Deseret Power has outlined its WFPP for wildfire prevention, and the Division has reviewed the filing and determined that it contains a point-by-point discussion of the requirements of the code. Based on its review, the Division concludes that Deseret Power's filing complies with Utah Code § 54-24-203 (1-3).

Conclusion

Based on its review, the Division recommends the Commission acknowledge Deseret Power's WFPP.

cc: Michele Beck, Office of Consumer Services
David Crabtree, Deseret Power
Nathan Powell, Deseret Power
Cami Reeder, Deseret Power