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# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

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

**Date:** January 15, 2025

**Re:** **Docket No. 24-066-04**, Dixie Power's 2023 Wildland Fire Protection Plan Annual Compliance Report.

## Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Dixie Power's retroactive 2023 compliance filing as complying with Utah Code § 54-24-203(4)(b). The Division also recommends the Commission require Dixie Power to provide additional information with future compliance filings.

## Issue

On December 30, 2024, Dixie Power filed a copy of its 2023 Wildland Fire Protection Plan compliance report (Compliance Report). 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 January 29, 2025. This memorandum represents the Division's response to the Action Request.

Division of Public Utilities

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## Discussion

Utah Code §54-24-203(4) requires electric cooperatives to (a) file with the governing authority an annual report detailing the electric cooperative's compliance with the Wildland Fire Protection Plan (WFPP); and (b) file with the Commission a copy of the annual compliance report.

When reviewing Dixie Power's 2024 Compliance Report, the Division noticed that although Dixie Power filed its 2023 WFPP on September 29, 2023, as required by Utah Code §54-24-203(3), the Division did not see that a compliance report was filed in 2023. The Division contacted Dixie Power and determined that although Dixie Power did file its updated WFPP on October 2, 2023, for plan period June 2023 – June 2026, it did not file the 2023 compliance report with the Commission. Dixie Power represented to the Division that the 2023 Wildland Fire Plan project completion was presented to the Board of Directors in November 2023, but the file was not sent to the Commission. Dixie Power said it submitted a new Wildland Fire Protection Plan in June of that year even though the 2023 projects were still being completed for that calendar year.<sup>1</sup> Dixie Power in fact completed a report to its board but did not file the report with the Commission. After notification of the deficiency, Dixie Power promptly filed its 2023 Compliance report with the Commission.

The 2023 Compliance Report was reviewed and approved by Dixie Power's Board of Directors at its November 1, 2023, board meeting and was retroactively filed with the Commission on December 30, 2024, as explained above.

The filing from Dixie Power reports that its service area covers mostly southern Utah and the northwest corner of Arizona, has 190 miles of transmission lines and covers approximately 1,433,243 acres. It serves 32,116 customers and has 32 substations. The filing also reports that there are 649 Overhead (OH) distribution line miles and 706 underground (UG) distribution line miles. Table 1 below compares the reported numbers for 2023 with the 2022 numbers.

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<sup>1</sup> December 30, 2023, cover letter email from Colin Jack, Dixie Power Chief Operating Officer.

Table 1: Changes from 2022 to 2023

County, State	Customers		Substations		Miles of OH Distribution		Miles of UG Distribution	
	2023	2022	2023	2022	2023	2022	2023	2022
Millard, UT	563	550	2	2	154	154	8	7
Iron, UT	973	951	6	6	231	231	34	34
Washington, UT	27,390	25,903	21	21	153	153	628	586
Mohave, AZ	3,190	3,071	3	2	111	110	36	32
<b>TOTALS</b>	<b>32,116</b>	<b>30,475</b>	<b>32</b>	<b>31</b>	<b>649</b>	<b>648</b>	<b>706</b>	<b>659</b>

In addition, Dixie Power reports that, in 2023, it replaced a 1.1-mile segment in Millard County that used to belong to Flowell Electric (Project 411-2),<sup>2</sup> and completed project (113-1),<sup>3</sup> a 2.4-mile segment in Iron County, UT that passes through an area of high fire risk between Newcastle and Pinto, the Reber and Ence taps, east of the road, as per its WFPP plans.

The Division recommends that Dixie Power timely file every year its Compliance report as required by §54-24-203(4) and list, in tabular form, the completed project(s) and the associated costs with each of the project(s) in its annual compliance report to the Commission. This is useful for the comparison of actual costs with any estimated costs mentioned in the WFPP.<sup>4</sup> In addition, other routine and annual maintenance and inspection events, such as inspection of poles, overhead lines, transformers,<sup>5</sup> substations;<sup>6</sup> and efforts spent on vegetation management, avian management, etc. should be noted for the Commission so that the Commission knows that such activities are ongoing and proceeding according to WFPP plan goals.

<sup>2</sup> See Dixie Power's September 2023 WFPP, p.15.

<sup>3</sup> September 2023 WFPP, p.13; also see Dixie Power's July 1, 2020, WFPP, p.7.

<sup>4</sup> September 2023 WFPP, p.44, replacement cost estimate per miles, and July 1, 2020, WFPP, p.22.

<sup>5</sup> September 2023 WFPP, p.36 notes that the Company will continue to inspect 10% of all poles, 33% of all pad-mounted transformers, 33% of overhead lines, and 20% of all right of ways (ROW); also see July 1, 2020, WFPP, p.16.

<sup>6</sup> September 2023 WFPP, p.33 notes that the Company inspects various system assets on a monthly, annual, tri-annual, or on as-needed basis.

## **Conclusion**

The Division has reviewed the retroactive 2023 compliance filing and recommends that the Commission acknowledge that Dixie Power has complied with Utah Code § 54-24-203(4)(b).

cc: Michele Beck, Office of Consumer Services  
LaDel Laub, Chief Executives Offices, Dixie Power