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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
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Jonathan Lee, Utility Analyst

Date: February 7, 2025

Re: **Docket No. 25-022-01**, Bridger Valley Electric Association's Wildland Fire Protection Plan Annual Compliance Report.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge with recommendations Bridger Valley Electric Association's (BVEA or Company) January 22, 2025; Wildland Fire Protection Plan Annual Compliance report as complying with Utah Code §54-24-203(4)(b).

Issue

On January 22, 2025, Bridger Valley filed a copy of its annual Wildland Fire Protection Plan (WFPP) 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 February 21, 2025. This memorandum represents the Division's response to the Action Request.



Discussion

Bridger Valley Electric is a non-profit rural electric distribution cooperative. 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 WFPP; and (b) file with the Commission a copy of the annual compliance report. Bridger Valley's Compliance Report was presented to its governing authority at a regular board meeting that was held on January 21, 2025, and was then filed with the Commission on January 22, 2025

The Compliance Report submitted by Bridger Valley indicated the following actions taken by the Company in 2024:

- BVEA hired Sage Electrical Solutions to clear the powerline right of way for 6.3 miles and trim trees for 8.6 miles in the Summit County area for a total of 14.9 miles.
- BVEA crews cleared right of way on three-phase powerlines for 9.8 miles in Summit and Uinta County areas.
- BVEA contacted Uinta County Weed and Pest to spray 9.8 miles section of line to help control underbrush growth. This was completed in the summer of 2024.
- BVEA crews trimmed and cleared the right of way on their 69kv transmission line in Daggett County for 15.1 miles.
- BVEA hung flyers and doorknobs in the Summit County area to help educate members on how to prepare their homes for wildfires.
- The report also includes actions taken during the year with regards to breakers put to the non-reclosing state from July 9, 2024, until October 17, 2024, in Summit County, Uinta County, and Daggett County areas.
- Finally, the report mentions BVEA's continued efforts to guard against raptors. A nesting pole was installed near the Bridger Lake Plant Henry Fork and all new powerline installations are completed in accordance with their avian protection plan as outlined in the Wildland Fire Protection Plan.

The Division has reviewed the filing and recommends the Commission acknowledge that Bridger Valley has complied with Utah Code §54-24-203(4)(b).

Recommendation

The Division recommends that in future BVEA's annual compliance reports, in addition to just reporting mileage numbers, BVEA should provide a better description of the location of where the work is being performed, and associated costs if it is not confidential so that the Commission has a better understanding of where the work is being performed and how much it is costing. The Division also recommends that BVEA acknowledge and confirm positively that the Inspection Procedure, in section 5.1 of its WFPP, is being adhered to on the various lines, distribution overhead feeders, and taps; including meeting its goal of 10% inspection of its poles each year. A comparison to prior year numbers and costs may also give better context for comparison purposes. Finally, the Division recommends that it may also be helpful to cross-reference the work being performed to sections of BVEA's WFPP.

Conclusion

Based on its review of the filing, the Division recommends the Commission acknowledge with recommendation that Bridger Valley has complied with the filing requirements for the Compliance Report under Utah Code § 54-24-203(4)(b).

cc: Michele Beck, Office of Consumer Services
Bob Larsen, BVEA Operations Manager