



# **Empire Electric Association, Inc.**

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October 13, 2025

VIA ELECTRONIC FILING

Utah Public Service Commission  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Administrator

RE: **Docket No. 25-025-01 – Empire Electric Association’s 2025 Wildland Fire Protection Compliance Report**

Pursuant to Utah Code Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, (“the Company”) hereby submits its 2025 Wildland Fire Protection Compliance Report.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [engineering@eea.coop](mailto:engineering@eea.coop)  
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By regular mail: Engineering  
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Informal inquiries may be directed to Dalton Randolph at (970) 564-4418.

Sincerely,

Dalton Randolph  
System Engineer

## 2025 EEA WILDLAND FIRE PROTECTION PLAN COMPLIANCE REPORT

Presented to and approved by the Empire Electric Association, Inc. Board of Directors on October 10, 2025.

### INTRODUCTION

Consistent with Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, Inc. (EEA) submitted the annual Wildland Fire Protection Plan (WFPP) compliance report to the EEA Board of Directors (Board) on October 10, 2025, providing plan implementation (completed and scheduled) for high- risk areas of Utah served by EEA.

### PLAN IMPLEMENTATION

1. The three substations that serve areas within the state of Utah, Monticello Rural (MU), Blue Door (BD) and Dove Creek (DC), were inspected (including substation protection devices) in 2025 as follows:
  - a. Dove Creek: 1/2, 2/3, 3/4, 4/2, 5/5, 6/3, 7/1, 8/4, 9/3
  - b. Monticello Rural: 1/2, 2/3, 3/3, 4/2, 5/5, 6/2, 7/1, 8/4, 9/3
  - c. Blue Door: 2/3, 3/3, 4/2, 5/7, 6/2, 7/7, 8/6, 9/3
2. Regulator maintenance is on a five-year cycle. The line regulator that feeds Squaw Point had maintenance completed in May 2021. Three - 167kVA MU regulators were rebuilt and installed 11/2024. Three - 114kVA DC regulators were rebuilt and installed 12/24.
3. Line patrols are scheduled for every three years. All circuits from the MU substation and DC3 were patrolled in June/July 2025. They will be patrolled again in the summer of 2028.
4. Substation circuit breaker maintenance traditionally occurs every three years or 70 operations, whichever occurs first. The G&W Viper reclosers used on MU and DC circuits have no maintenance other than cleaning and checking connections, they are a pass or fail device. The Viper does have a duty cycle and target count with the goal to replace the vipers when the duty cycle approaches 100%. All DC and MU G&W Vipers are under their duty cycle. The Viper protecting MU3 was replaced due to nuisance tripping in spring 2023. It was determined that the voltage, current and control cable was faulty, so cables were replaced on all the Viper reclosers on the DC and MU substations.
5. Poles are tested on a 12-year cycle and the poles in the high-risk fire danger areas were last tested in 2020 for MU, and 2022 for DC. They are due to be tested again in 2032 and 2034 respectively. Poles may also be identified for replacement during line patrols or routine line work. EEA replaced three poles on MU3 and two poles on DC3 in June of 2025. EEA also replaced one pole and six epoxilators on BD3.
6. Vegetation management/tree-trimming in the EEA right-of-way is currently being done as

of 9/2/2025 on the MU circuits. The DC circuits were completed in April 2025.

7. EEA WFPP Paragraph 4.a. specifies that the MU1 and MU3 feeders protection devices in the Monticello Rural substation and the DC3 protection device in the Dove Creek substation will be upgraded to Arc Sensing Technology recloser controls. We have installed the SEL 651R's with high impedance fault detection (HIFD)/ Arc Sensing Technology at the Monticello Rural substation. MU1 and MU3 have arc sense active now. EEA's 2023 WFPP called for arc sensing technology to be installed at DC3 by September 2024. We noted in our 2024 WFPP update that more time would be needed due to unforeseen constraints at DC3. EEA will need to replace the existing 651R relay with a newer model with more accurate measurement. The new 651R will allow .02 (10 amps) of nominal current where the older model only allowed .05 of nominal current (25 amps) for the HIF detection. This change is planned for end of 2025 or beginning of 2026.
8. All the system protection devices that were determined to serve high-risk fire danger areas were put on the "summer" settings (non-reclose) as of 4/14/2025. These devices were identified in paragraph 4.b. of the EEA WFPP. The devices identified in the EEA WFPP are still currently on the summer settings.
9. Since there were no wildland fires in our Utah service territory in 2025, we did not have to implement emergency outage or electrical power restoration procedures.

## COST REPORT

### 1. Vegetation Management

The cost for tree-trimming and vegetation management on circuits serving Utah are shown in Table 1 below.

*Table 1. 2025 Vegetation Management Costs*

Substation	Circuit	Percent Complete	Cost/ Estimate
Dove Creek	DC3	100%	\$ 74,969.07
Monticello	ALL	1%	\$ 125,000.00

### 2. Blue Mountain Ranches Underground Project

In 2024, EEA was notified that it would be awarded the State of Utah formula 40101(d) to upgrade the powerline to Blue Mountain Ranches, South of Monticello, UT, from overhead to underground. EEA was awarded \$500,019 with the obligation to match \$257,586. Currently, easement and material acquisition are taking place. Construction is scheduled to begin in Spring 2026.

Table 2. Blue Mountain Ranches Project Cost

Substation	Circuit	2025 Expenses	Total Project Budget
Monticello	MU3	\$ 9,893.00	\$ 757,605.00

3. SEL – 651R at Dove Creek Substation

EEA will be installing new SEL-651R controls on DC3. This will allow implementation of HIFD/Arc Sense, without a large substation reconfiguration project.

Table 3. SEL-651R Costs at DC3

Substation	Circuit	2025 Expenses	Expected Cost
Dove Creek	DC3	N/A	\$ 9,938.00

WFPP CHANGES

A new WFPP was submitted to the Utah PSC, docket number 23-025-01, in August 2023. The only change recommended at this time is the time extension to have HIFD implemented at the Dove Creek substation, as noted above. However, there are areas of concern that we are monitoring to see if changes will be needed in the future.

1. One area of concern is the language concerning Substation Circuit Breakers in Exhibit “C” – EEA Maintenance Master Plan - Circuit Breaker Maintenance. Due to electronic reclosers having a manufacturer recommended duty cycle, implementation of maintenance on the basis of number of operations is unnecessary.

CONCLUSION

EEA will continue to comply with the present WFPP for the next year. In 2023, EEA submitted a new plan to follow for the next three years, according to the statutes. EEA will continue to submit an annual compliance report as required.