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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
Jeremy Hirschi, Utility Technical Consultant
Savannah Torman, Utility Analyst

Date: November 24, 2025

Re: **Docket No. 25-032-01**, Raft River Rural Electric Cooperative's 2025 Wildland Fire Protection Plan Compliance Report.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) acknowledge Raft River Rural Electric Cooperative's (Raft River or Company) Wildland Fire Protection Plan's 2024 Compliance Report, filed on October 27, 2025, as complying with Utah Code §54-24-203(4)(b). The Division recommends Raft River consider:

1. Reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. Submitting its annual compliance report for the previous year's activities to its governing board by June 1st.
3. Reporting the actual metrics and costs for the current year next to the planned goals and budgets from the approved plan to ensure accountability and transparency of implementation.



4. Reporting fire suppression and mitigation costs separately to ensure accountability, comparability, and transparency of the plan.
5. Filing the Compliance Report in a separate docket than the Plan as helps with record-keeping of filings as well as help avoid confusion and unnecessary complexity for the Commission, Division, and public.

Issue

On October 27, 2025, Raft River filed a copy of its 2025 Wildland Fire Protection Plan Compliance Report (Compliance Report) along with its revised 2025 Wildland Fire Protection Plan (2025 Plan). On October 28, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations by November 26, 2025. This memorandum represents the Division's response to the Action Request.

Discussion

Raft River is a non-profit rural electric distribution cooperative. Utah Code §54-24-230(4) requires electric cooperatives to: (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).

Raft River submitted its 2025 Compliance Report and revised 2025 Plan to its governing authority, which is its Board of Directors, on October 22, 2025, and they were approved. Both Reports were then filed with the Commission on October 27, 2025. Due to the combined filing of its Compliance Report together with its 2025 Plan, the Division's review will be presented below in separate sections.

2024 Annual Compliance Report

The Compliance Report submitted by Raft River reported the following expenditures in 2024, with comparisons to previous years where applicable:

Table 1. Operation and Maintenance Expense Summary 2024

2024 Raft River Rural Electric Cooperative Fire Protection Utah Operations and Maintenance Costs	
Reconstruction Utah (107.20)	\$67,846.18
Substation (592.02)	\$16,878.25
Line Patrol (583.02)	\$57,389.89
Line Maintenance (593.02)	\$145,856.54
Meter Maintenance (597.02)	\$5,148.14
URD Line Expense (584.02)	\$16.58
URD Line Maintenance (594.02)	\$1,131.14
Transmission Maintenance (571.02)	\$10,316.15
Chemical (1/6 total)	\$2,010.08
Tree Trimming (1/6 total)	\$19,635.83
Tree Mastication (Utah)	\$0
Total 2024 Utah Fire Prevention Costs	\$326,228.78

Table 2. O&M Costs in Utah 2022-2024

Operations and Maintenance Costs (Utah)			
	2022	2023	2024
Transmission	\$22,282.41	\$15,722.00	\$10,316.15
Substation	\$9,167.88	\$11,841.00	\$16,878.25
Distribution	\$169,670.30	\$163,253.00	\$299,034.38
Total	\$201,120.59	\$191,253.00	\$326,228.78

Raft River reports a more-aggressive approach to vegetation management around certain vulnerable poles. The Company conducts complete line inspections on lines that have experienced circuit interruptions during high fire risk periods, in addition to utilizing fault-sensing equipment. The Company schedules line replacement projects annually, using factors like pole age/condition, span length, conductor type, and accessibility.

Additionally, Raft River worked to educate its member owners on methods to reduce fire hazards, such as reporting problem trees and loose/hanging wires, and keeping equipment away from poles or transformers. Finally, the Company reports: “The implementation of the Fire Mitigation plan has been instrumental in the alignment with various agencies to allow Raft River the collaborative approach to reducing and even eliminating fire hazards. Though

there is still much work to be done to accomplish all things listed in the plan, we feel we have made extensive progress in the right direction.”¹

2025 Plan

A revised Raft River Rural Electric Cooperative Wildland Fire Protection Plan for 2025 was submitted to the Commission along with the 2024 annual compliance report. The Division reached out to the Company to clarify its intention with the 2025 Plan. The Company informed the Division that the Plan was submitted in response to the Division’s recommendation in the previous plan submission as part of Docket 24-032-02 and was also intended to supplement the annual compliance filing. The Company intends to file an updated plan in 2026 according to Utah State statute,² which will then cover the years 2027 through 2029.

Recommendations

DPU recommendations found in this filing are consistent with its recommendations in other electric cooperative dockets³ and are provided in an effort to standardize reporting recommendations across all electric cooperatives. The Division recommends that annual reports be completed on a full 12-month calendar year basis, and that annual reports are submitted to electric cooperatives’ governing bodies by June 1st for the previous year. The Division also recommends electric cooperative utilities include separate reporting metrics for expenditures related to fire mitigation and fire suppression, as the activities of each can differ.

The Division highlights that Utah Code § 54-24-203 is currently silent on an annual submission deadline for electric cooperatives. This stands in sharp contrast to investor-owned utilities, which are clearly required to submit their yearly reports to their governing authority by June 1. There has been inconsistency in reporting from year to year and between electric cooperative reports. The Commission and the cooperatives may wish to

¹ Docket No. 25-032-01, Raft River Rural Electric Cooperative’s 2025 Wildland Fire Protection Plan Compliance Report.

² Utah Code § 54-24-203(3)(a)(ii)

³ Docket Nos. 25-028-06 and 25-025-01, DPU Comments.

consider setting a date for electric cooperatives' cost and compliance reports. Establishing a submission deadline could eliminate ambiguity and ease review for all parties.

Furthermore, when the Company files the 2026 Plan, it is filed separately from the annual compliance plan.

Conclusion

Based on its review of the filing, the Division recommends that the Commission acknowledge that Raft River has complied with the filing requirements for the 2025 Compliance Report under Utah Code §54-24-203(4)(b). The Division also provides the following suggestions:

1. Raft River may wish to report on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. Raft River should consider submitting its annual compliance report to its governing board for the previous year's compliance by June 1st. This could provide clarity and simplify its tasks and others' review.
3. Raft River's report of the actual metrics and costs for the current year next to the planned goals and budgets from the approved plan could help ensure accountability and transparency of implementation while increasing the value of its data.
4. If Raft River reports fire suppression costs, reporting them separately from mitigation costs can provide a fuller, more accurate picture of its activities and their effects.
5. Filing the Compliance Report separately from the Plan will help with record-keeping of filings as well as help avoid confusion and unnecessary complexity for the Commission, Division, and public.

cc: Chad Black, General Manager, Raft River Rural Electric Cooperative
Michele Beck, Office of Consumer Services