ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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May 30, 2025

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

Re: Docket No. 25-035-38 – Rocky Mountain Power's 2025 Wildland Fire Cost and Compliance Report

Pursuant to Utah Code § 54-24-201(4) and 54-24-202(2) and Administrative Code R746-315-3, PacifiCorp, d.b.a. Rocky Mountain Power, ("the Company") hereby submits its 2025 Wildland Fire Cost and Compliance Report ("Report").

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

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Sincerely,

Jana Saba
Director, Regulation and Regulatory Operations

Enclosures

CC: Division of Public Utilities
Office of Consumer Services

CERTIFICATE OF SERVICE

Docket No. 25-035-38

I hereby certify that on May 30, 2025, a true and correct copy of the foregoing was served by electronic mail to the following:

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ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

Utah Wildfire Mitigation Plan

Cost and Compliance Report

June 1, 2025

1 INTRODUCTION

Consistent with Utah Code § 54-24-201(4), § 54-24-202(2), and R746-315-3, Rocky Mountain Power ("the Company") submits this Annual Cost and Compliance Report ("Report"), which provides the following:

1. Details of the Company's wildfire mitigation efforts undertaken in 2024 in compliance with the Plan as filed in Docket No. 20-035-28 ("2020 WMP Docket");
2. The actual capital investments and expenses incurred in calendar year 2024 relative to the 2020 Wildfire Mitigation Plan ("WMP" or "the Plan")[1] filed in the 2020 WMP Docket, and an updated forecast of the capital investments and OMAG (operations, maintenance administrative and general expenses (also referred to as Expense in this document) for 2025; and
3. Changes, if any, incorporated into the WMP during the previous year and the reason for the changes in accordance with the Public Service Commission of Utah's ("Commission") October 13, 2020, order in the 2020 WMP Docket.

This report contains elements of the planned capital investment and spending relative to the approved 2020 WMP. However, in 2024 Rocky Mountain Power worked diligently to implement the wildfire-preventative measures set forth in its 2023-2025 WMP during the pendency of the General Rate Case, Docket No. 24-035-04 ("2024 GRC"). While this report details compliance with the 2020 WMP, the report may reference the unapproved 2023 WMP where it provides necessary context.

The core principles of the WMP include system-wide situational awareness and operational readiness systems, which are central to identifying and mitigating fire risk. The impact of a fault event can be minimized by using equipment and personnel to isolate the fault and ensure power is safely restored. The frequency of ignition events related to electric facilities can be reduced by engineering a more resilient system, targeted in fire high consequence areas.

[1] The terms "wildland fire protection plan" and "wildfire mitigation plan" are synonymous.

2 COMPLIANCE WITH THE PLAN

2.1 RISK MODELING AND DRIVERS

Risk Modeling Tools

Review and update composite risk score - In 2024, Rocky Mountain Power received new FireSight model outputs. The FireSight model associates wildfire hazards with the location of existing electric assets. The model is used to estimate the probability and consequence or impact of a wildfire from a given ignition point along Rocky Mountain Power's electric infrastructure. In 2024, Rocky Mountain Power reviewed and updated with new data its risk scores for wind-driven fires and fuel/terrain-driven fires which were combined to create a composite risk score for circuits in the service territory.

Benchmarking and lessons learned - In 2024, the Company participated in joint utility workshops, conferences, and benchmarking discussions to evaluate industry practices for wildfire risk modeling and analysis. This included utility wildfire mitigation conferences, joint utility working groups for mitigation effectiveness and risk modeling, and direct discussions with peer utilities working on wildfire risk mitigation. Lessons learned from these sessions inform future risk model updates and new analyses to support wildfire mitigation program planning.

2.2 INSPECTION AND CORRECTION PROGRAM

Distribution and Transmission Facility Point Inspection and Correction

Continue planned inspection programs on transmission and distribution lines - In 2024, Rocky Mountain Power continued inspections in accordance with its general inspection policies and procedures for areas within the FHCA. These inspections include visual safety inspections and detailed assessments. All planned inspections for 2024 were successfully completed.

Table 1 below summarizes the conditions that were corrected throughout 2024 as a result of

the inspection programs, along with their condition priority classification. The increase in both corrected conditions and outstanding conditions compared to prior years is attributed to the expansion of the FHCA.

Table 1: 2024 Summary of Open and Corrected Conditions Identified

Area	Energy Release Risk	Condition Priority	Planned Correction Timeframe	Open Conditions*	Corrected Conditions
FHCA	Yes	I	Immediately	0	0
FHCA	Yes	A	60 days average	144[2]	870
FHCA	Yes	B	12 months	1,675	2,352
FHCA	No	A	120 days average	101	625
FHCA	No	B	not specified	4,922	2,419
			Total	**6,842**	**6,266**

**Open conditions as of December 31, 2024*

Energy Release Conditions, as defined by Asset Management's general policy for condition priorities and correction time frames, are a type of condition that, under certain circumstances, can correlate to an increased risk of a fault event and potential release of energy at the location of the condition. These conditions are a priority and scheduled to be corrected when locations can be safely accessed by line operations. Open conditions indicate that the defect still exists, but this does not necessarily mean that the corrections are overdue or outside of the specified correction timeframe.

Transmission Infrared Inspection

Continue enhanced infrared inspections - Infrared inspections were performed on 1,638 line miles to detect potential conditions or "hot spots" that may not be identifiable through the other inspection programs. These inspections are strategically scheduled during peak loading to increase the likelihood of identifying thermal anomalies that could indicate a potential issue.

[2] *At the time of filing this report, 107 priority A conditions have been corrected, with 37 outstanding.*

2.3 VEGETATION INSPECTION AND MANAGEMENT

Continue planned vegetation management programs - In 2024, vegetation management activities included an annual inspection of circuits within the FHCA, extended post work clearances for vegetation, and pole clearing at the base of identified poles.

The annual inspection is performed to identify any vegetation that might pose a risk of fall-in or a contact risk with the energized lines, necessitating corrective actions. Extended clearances are conducted to reduce the risk that vegetation growth will exceed the minimum distance to the energized lines before the next scheduled inspection.

Pole clearing on subject poles (e.g., equipment poles) located in the FHCA involves removing all vegetation within a 10-foot radius, extending up to eight feet vertically, around each subject pole. Herbicide and/or soil a sterilant are then applied to prevent vegetation regrowth. This minimizes ignition risk if the equipment on the targeted pole releases a spark. Refer to Table 6 for summary of planned versus actuals for these efforts and summary of trees removed and trees pruned.

2.4 ENVIRONMENTAL PROGRAM

Avian Protection Plan and Wildlife Protection Plan

Continued avian protection plan work - Rocky Mountain Power continued implementation of its Utah Avian Protection plan. The avian protection plan is intended to address avian electrocution risks by reducing the likelihood of bird or animal contact with energized lines. The plan includes pro-active actions including nest management, substation protections, and line element protections or pole retrofits. Nest management activities include relocating the nest or installing avian guards. The activities are performed to reduce the risk of animal contact with energized lines. Pole retrofits are performed to reduce nesting or animal contact in areas where previous incidents have occurred. The Company also partners with HawkWatch International to install or maintain nest boxes for cavity nesting birds that could

be impacted by removal of nest sites through vegetation management of dead or dying trees. Table 2 summarizes the completed activity for the avian protection plan in 2024 for nests managed, poles retrofitted, and nest boxes installed or maintained.

Table 2: 2024 Avian Protection Plan Summary

Environmental Project	Completed	Outstanding
Nests Managed	76	0
Poles Retrofitted	4,907	0
Nest Boxes for Cavity Nesting Birds	500	0

Habitat and Fire Resiliency

Complete habitat project scoping - The Company worked with Pheasants Forever in 2024 on the Intermountain West Joint Venture's Forest Habitat program. The program identifies habitat improvement projects that can be implemented to support healthy, fire resilient forests across large landscapes involving multiple public and private partners. The projects mitigate the wildfire risk both within Rocky Mountain Power's service territory and adjacent to the Company's infrastructure by removing dead and dying trees, restoring vegetation to encourage fire resiliency, improving the water quality, and increasing the water volume to reduce the possibility and impact of a wildfire in the project areas. In 2024 the Company worked with these partners on planning and budgeting for a collaborative project with the U.S. Forest Service in southern Utah, with on-the-ground vegetation and habitat work scheduled to begin in 2025.

2.5 SYSTEM HARDENING

Line Rebuild Program

Complete 2024 line rebuild projects - The company's line rebuild program involves overhead lines within or adjacent to the FHCA that were constructed with bare overhead conductor.

As part of the program the lines may either be moved, removed, converted to underground, rebuilt, or retrofitted with more resilient materials such as covered conductor or non-wooden poles. Table 6 shows the planned line rebuild miles and the miles that were completed.

Advanced System Protection

Complete 2024 planned equipment upgrade projects - The replacement and upgrading of electro-mechanical relays and microprocessors throughout circuits within and interconnected to the FHCA continued in 2024. The replacement of relays provides multiple wildfire mitigation benefits including increased programmed function speed compared to an electro-mechanical relay and, most importantly, the faster relay will limit the length and magnitude of fault events. The equipment upgrades also enable customized settings to address environmental conditions. As part of replacing an electro-mechanical relay, the associated circuit breaker or other line equipment may also be replaced, as appropriate, to facilitate the functionality of a microprocessor relay. Table 6 shows the completed status compared to what was planned for the different equipment replaced or upgraded in 2024.

Expulsion Fuse Replacements

Complete 2024 planned expulsion fuse replacements - In an effort to reduce the arcing experienced from an expulsion fuse operation, expulsion fuses are being replaced proactively within the FHCA. The total scope of expulsion fuse replacements spans multiple years over many circuits across the company's service territory. Table 6 shows the expulsion fuses planned for replacement and what was completed in 2024.

Fault Indicators

Complete 2024 planned fault indicator Installations - Fault indicators are being installed to reduce outage duration, such as those experienced due to enhanced recloser or relay settings. Fault indicators assist in response times as the location of the fault can be determined quicker. A total of 193 communicating fault circuit indicators (CFCI) were installed in 2024.

2.6 SITUATIONAL AWARENESS PROGRAM

Meteorology Department

Continued weather modeling – The Company's experienced meteorology department is an essential group that gathers data and interprets and translates the data into an assessment of risk, specific for the utility. The assessment is a key component in decision making. The department uses an internal operational Weather and Research Forecast (WRF) model and a complementary 30-year WRF re-analysis across the Company's entire service territory. The model created a comprehensive forecast of atmospheric, fire weather, and National Fire Danger Rating System parameters out to 96 hours (4-days). The forecast is overlayed on the electrical distribution and transmission network to determine asset level weather related impact and fire potential risk. In 2024 the meteorology department continued to analyze the daily risk.

Weather Station Network

Expand weather station network - Rocky Mountain Power found that publicly available weather data can have limitations. The Company does not have visibility regarding the maintenance and calibration of public weather stations, and the frequency of data collection may not match the needed intervals for performing real-time risk assessments and dynamic modeling. As a result, the Company installed additional weather stations throughout the state. As the weather station network grows and expands, it is regularly evaluated for continuous improvement opportunities.

Complete annual weather station maintenance - An important component of the weather station network is the annual maintenance performed on existing weather stations. All weather stations installed by December 31st, 2023, required annual calibrations in 2024.

Table 6 shows the planned and actual weather stations installed and weather stations maintained in 2024.

Seasonal Wildfire Risk

Continued use of weather modeling tools - In 2024 the Company continued to use the

Wildfire Analyst Enterprise (WFA-E) modeling tools from Technosylva. The main modules used by meteorology for WFA-E are FireRisk and FireSim. FireRisk is a product that models 8-hour wildfires simulated at 100-meter intervals every three hours across the entire system. The resultant data provides wildfire potential risk metrics such as fire size potential, live and dead vegetation moisture, and weather conditions which are used to understand the fire potential across the service territory. In 2024 the output of these models were used to inform the District Fire Risk.

Assessing the District Fire Risk

Continued daily district fire risk assessments – In 2023 the meteorology group developed an index, in conjunction with other fire indices. The internally developed metric called the Modified Hot-Dry-Windy Index (mHDWI) has been utilized since. The index is composed of fuels metrics and weather conditions to assess wildfire potential. The combination of mHDWI and wind gust percentiles provides wildfire risk levels in the daily forecast. The daily forecasts are used to identify the weather conditions, and which areas might have an elevated, significant, or extreme risk of wildfire. Alongside mHDWI, the fuels and fire metrics are part of the analysis performed to identify the wildfire risk.

2.7 SYSTEM OPERATIONS

Continue deployment of enhanced safety settings - The Company developed enhanced safety settings (ESS) formerly referred to as elevated fire risk (EFR) settings that are enabled to reduce the potential energy released in a fault event. The settings can be enabled based on the daily risk assessment performed by the meteorology group. Relays and line reclosers are an example of devices that can have enhanced settings enabled.

2.8 FIELD OPERATIONS AND WORK PRACTICES

Modified Work Practices

Continue field implementation of wildfire programs – District Fire Risk is used to inform

additional patrols and coordination. As discussed within the system operation section there can be different re-energization practices that require patrols or assessments. Table 3 shows the number of 2024 de-energization events that would have led to additional patrols that were completed on distribution and transmission circuits based on risk assessments.

Table 3: 2024 De-Energization Events

De-energization Type	Event Count
Enhanced Safety Settings	1,222
Emergency De-energization	24

Mobile Communication Devices

Procure additional communication equipment to aid in response - In order to respond effectively in locations throughout the service territory where there may not be cellular connectivity, Rocky Mountain Power procured 26 Starlink satellite communication devices. The devices are strategically placed throughout the service territory and used during a major event to improve communication capabilities to the control center, base camp, and/or management. The devices support emergency restoration activities through increased communication ability which can help mitigate impacts to customers.

Equipment and Tool Purchases

Procure vehicles and equipment to aid in wildfire mitigation – In 2024 Rocky Mountain Power procured one additional fire truck to help conduct fire work in fire season. Other costs incurred include upfits for fire trucks, and other equipment to help mitigate wildfire risk, to aid in patrols in remote locations, and to help restoration efforts. Table 4 below shows the equipment that was procured in 2024 for wildfire mitigation.

Table 4: 2024 Equipment and Tools Purchased

Equipment	Units	Use Description
Fire Truck	1	Field work in fire season
Fire truck, forklift, UTV, and backhoe-related fees and upfits	17	Material management/FHCA/ Restoration efforts

Wildfire Training Material

Develop wildfire eBooks and training applications - In 2024, Rocky Mountain Power completed the development of training materials including eBooks and mobile applications to be available for internal employees. The goal of the training materials is to prepare and train crews before an event happens to reduce response time and aid in the effectiveness of the response. The topics include wildfire protection, roles and responsibilities, and Public Safety Power Shutoff. The applications include interactive scenarios to inform and guide crew actions during wildfire events.

2.9 PUBLIC SAFETY POWER SHUTOFF (PSPS)

2024 PSPS Experience

Continue PSPS readiness - In 2024 the Company did not experience conditions that would require a PSPS Watch or a PSPS event in Utah.

2.10 EMERGENCY MANAGEMENT WILDFIRE RESPONSE

Continue wildfire response readiness - The Company's emergency response is guided by the National Incident Management System (NIMS). The approach is applicable to any type of wildfire event, ranging from a relatively small wildfire that can be controlled by a local fire suppression agency, to larger wildfire events that require a coordinated interagency response.

2.11 PUBLIC SAFETY PARTNER COORDINATION STRATEGY

Complete events with public safety partners for emergency response - As part of emergency preparedness efforts, the Company takes a multi-step approach in coordination with public safety partners on wildfire mitigation and PSPS preparedness. The strategy includes outreach, workshops, and tabletop exercises throughout the year and across the service territory with public safety partners. The design of the informal discussions in meetings or workshops is intended to orient participants to a new concept or procedure. Workshops performed are

localized, with targeted discussions that build upon general outreach. The workshops aim to refine plans, streamline processes, and confirm capabilities. Tabletop exercises develop awareness of PSPS planning and procedures. Table 5 below shows events conducted in 2024.

Table 5: 2024 Public Safety Partner Events

Activity	Location	Date Completed
Wildfire/Hazards Workshop	Uintah County - Ashley Service Center	1/31/2024
Wildfire/Hazards Workshop	Millard, Sanpete, Sevier, Piute and Garfield Co./ Held in Richfield	2/15/2024
Wildfire/Hazards Workshop	Juab and Utah Co./Held in Provo	2/20/2024
Wildfire/Hazards Workshop	Carbon and Emery Co./Held in Wellington	3/7/2024
Wildfire/Hazards Workshop	Grand and San Juan Co./Held in Moab	3/13/2024
Wildfire/Hazards Workshop	Washington Co/Held in St. George	3/26/2024
Wildfire/Hazards Workshop	Salt Lake Co.	4/8/2024
Wildfire/Hazards Workshop	Davis Co.	4/10/2024
FFL statewide meeting	State partners/Forestry Wardens/FMO's	4/18/2024
Tooele County TTX	Tooele County, Utah	4/19/2024
Wildfire/Hazards Workshop	Rich/Cache/Box Elder	4/22/2024
Wildfire Mitigation Webinar	Rocky Mountain Power	4/23/2024
Wasatch Back PSPS TTX	Utah/Summit/Wasatch Co, Utah	4/24/2024
RMP EM/Wildfire for Incident Commanders	State of Utah	5/22/2024
PSPS TTX	Iron/Beaver County, Utah	5/31/2024

Public Safety Partner Portal

Implement improvements to Public Safety Partner Portal - The Company completed the Public Safety Partner Portal in 2024 with training, coordination and communication with Public Safety Partners planned during 2025 outreach. The portal is a secure web-based portal where critical information can be shared with public safety partners during a PSPS event. The portal is a map-centric application that hosts critical GIS files along with information regarding critical facilities and infrastructure.

2.12 WILDFIRE SAFETY AND PREPAREDNESS ENGAGEMENT STRATEGY

Continue community outreach about wildfire safety - The Company employs a multifaceted

approach to support community engagement and outreach with the goal of providing clear, actionable, and timely information to customers, community stakeholders, and regulators. Over the past several years, the Company has engaged customers and the general public on wildfire safety and preparedness through a variety of strategies including webinars, targeted paid advertising campaigns, informational videos featuring company subject matter experts, press engagement, distributed print materials, infographics, social media updates, and communication through bill messages, emails and website content, and other communication channels. In April of 2024, the Company hosted a webinar to engage with Utahns and increase community awareness.

2.13 INDUSTRY COLLABORATION

Continue industry collaboration involvement – The company continues active engagement in industry collaborations to maintain an understanding of best practices and continued collaboration with experts regarding new technologies and research. The Company is a member of the International Wildfire Risk Mitigation Consortium (IWRMC) which is an industry-sponsored collaborative designed to facilitate the sharing of wildfire risk mitigation techniques and program effectiveness. The Company also plays leadership and support roles through other organizations such as the Edison Electric Institute, Alltricity Network, and the Institute of Electrical and Electronics Engineering.

Participated in climate risk initiative - Beginning in 2023, the Company began participating in a three-year Electric Power Research Institute Climate Resilience and Adaption initiative (READi). By working with industry stakeholders and other utilities, a common framework can be created to assess climate risk, address resilience, and evaluate investments.

2.14 PLAN MONITORING AND IMPLEMENTATION

Continue to develop the WMP and ensure adherence to Plan - In 2024 the Wildfire Safety Program Delivery group filed the updated 2023 Utah WMP and ensured that each initiative progressed toward the established plan. Initiative owners are responsible for developing

individual project plans to ensure the plan objectives are met, while the Wildfire Safety Program Delivery group ensures the project plans are aligned with the WMP's objectives. The group performs regular status checks with the initiative owners to ensure that risks and issues are being monitored, and that prompt action is taken to resolve issues for successful project execution. Although the 2023 Wildfire Mitigation Plan was not approved by the Commission in its order issued on April 25, 2025, the Company was actively working on plan implementation during the pendency of the proceeding. The Company has been committed to adhering to its plan's objectives.

Table 6 below details the Company's compliance with Utah Code 54-24-201(2) by mitigation program. Objectives for each program category reflect the 2023 plan goals that were implemented during 2024.

Table 6: Summary of 2024 Compliance with Utah Code 54-24-201(2) by Mitigation Program

Mitigation Program	Objectives	Compliance Details	Utah Code 54-24-201(2)
Risk Modeling and Drivers	Review and Update Composite Risk Score	Reviewed new FireSight model outputs to update risk scores.	A
Inspection and Correction Program	Continue standard inspection programs: Distribution Visual Safety: 37,098 Transmission Visual Safety: 55,868 Distribution Detail: 1,385 Transmission Detail: 17,879 Distribution Intrusive: 5,167 Transmission Intrusive:5,112	Completed standard inspection programs: Distribution Visual Safety: 37,098 Transmission Visual Safety: 55,868 Distribution Detail: 1,385 Transmission Detail: 17,879 Distribution Intrusive: 5,167 Transmission Intrusive:5,112	B
	Perform infrared inspection on 1,638 miles of transmission lines.	Completed 1,638 miles of transmission IR inspections.	
Vegetation Management	Perform FHCA vegetation inspections and corrections: Distribution Miles: 1,172 Transmission Miles: 890 Pole count: 12,529	Perform FHCA vegetation inspections and corrections: Distribution Miles: 1,172 Transmission Miles: 890 Program resulted in 1,109 trees removed, 6,439 trees pruned, and 12,930 poles cleared.	C
System Hardening	Complete line rebuild projects: 20 miles of transmission lines 80 miles of distribution lines	Completion of 102 miles of Line rebuild (8 transmission line miles, 94 distribution line miles)	D

Mitigation Program	Objectives	Compliance Details	Utah Code 54-24-201(2)
	Complete Device Upgrades: 18 distribution relays 0 transmission relays 10 recloser replacement	Completion of 82 device upgrades (19 distribution relays, 6 transmission relays, 57 recloser installations).	
	Complete 2,000 expulsion fuse replacements	Completion of 2,921 expulsion fuses replaced.	
	Complete 134 CFCI replacements	193 CFCI installed as replacements.	
Situational Awareness Program	Continued weather modeling by meteorology department	Completed - Meteorology's department as essential for gathering data, interpreting data, and translates data into an assessment of risk.	D
	Expand weather station network with 25 additional weather stations	Completed installations of 25 additional weather stations.	
	Complete annual weather station maintenance on 127 weather stations	Completed maintenance on 127 weather stations.	
	Continue use of weather modeling tools.	Completed - The use of WFA-E modeling with FireRisk and FireSim to understand the fire risk across the service territory.	
	Continue daily district fire risk assessments	Completed the development of the Modified Hot-Dry-Windy Index mHDWI to aid in district fire risk assessments.	
System Operations	Continue deployment of enhanced safety settings	Completed - enhanced safety settings were utilized in 2024.	D
Public Safety Power Shutoff (PSPS)	Continue PSPS Readiness	Completed PSPS readiness and no PSPS events were required in 2024.	E, F
Emergency Management Wildfire Response	Continue wildfire response readiness	Completed. The Company's emergency response is guided by NIMS.	F
Public Safety Partner Coordination Strategy	Complete events with public safety partners for emergency response.	Completed 15 events with public safety partners.	H
	Implement improvements to the Public Safety Partner Portal.	The Public Safety Partner Portal was completed in 2024. The Company is conducting outreach and training in 2025.	
Wildfire Safety and Preparedness Engagement Strategy	Continue community outreach about wildfire safety	Conducted 1 community webinar.	H
Plan Summary, Cost and Benefits	Plan implementation costs	Plan summary and implementation costs are included in this report.	G

3 CAPITAL AND O&M EXPENDITURES, FORECASTS AND PLAN UPDATES

3.1 CAPITAL SPEND SUMMARY

In 2024, Rocky Mountain Power invested $178.1 million in capital expenditures to implement Wildfire Mitigation programs described in this Report. These expenditures are detailed in Table 7 below including both actual capital expenditures for 2024 and the forecasted expenditures for 2025. The values presented reflect capital expenditures, which is based on when the expenditures occur and differ from capital additions, also known as "rate base," which is based on the timing of when projects are placed-into service. The forecasted 2025 value is based on the Company's current plan and is under evaluation to align with the recent Commission guidance in the 2024 GRC order, while maintaining appropriate and safe levels of capital investment.

Table 77: Wildfire Mitigation Plan Implementation Summary – Capital

Mitigation Program ($ Millions)	2024				2025
	Actual	Plan (2020 WMP)	Variance	Variance Description (Actual vs Plan)	Forecast
Distribution					
Risk Modeling and Drivers	$2.4	$0.0	$2.4	Cost incurred for weather forecasting and analytics modeling.	$0.6
Inspection and Corrections	$18.5	$1.5	$17.0	Cost incurred for correcting conditions and deficiencies found in the expanded FHCA.	$20.0
Environmental	$0.4	$0.2	$0.2	Cost associated with retrofitting poles and managing nests to prevent avian and wildlife contacts.	$0.5
System Hardening	$128.9	$20.2	$108.7	Cost to implement system hardening initiatives including line rebuild, relay replacements, and fuse installation.	$85.0
Situational Awareness	$1.7	$0.0	$1.7	Cost to install new weather monitoring equipment and Pano cameras.	$0.3
Field Operations and Work Practices	$0.5	$0.0	$0.5	Cost to purchase additional vehicles, equipment, and rapid response communications equipment to be used in remote areas.	$0.5
Total Distribution	**$152.3**	**$21.9**	**$130.4**		**$106.9**
Transmission					
System Hardening	$24.7	$5.9	$18.8	Cost to implement system hardening initiatives including transmission line rebuild and relay replacements.	$50.0
Inspection and Correction	$1.1	$0.0	$1.1	Cost incurred for correcting conditions and deficiencies found in the expanded FHCA.	$0.0
Total Transmission	**$25.8**	**$5.9**	**$19.9**		**$50.0**
Total Costs	**$178.1**	**$27.7**	**$150.3**		**$156.9**

3.2 O&M SPEND SUMMARY

In 2024, Rocky Mountain Power spent approximately $18.7 million in operation and maintenance (O&M) activities for Wildfire Mitigation as shown in Table 8 below. The table includes actual amounts spent by mitigation program and planned spend based on the 2020 WMP, with a description of the variance between the actual and planned values. It also includes the Company's revised end-of-year 2025 forecast, as of May 2025. Rocky Mountain Power is currently reviewing the 2025 O&M budgets in consideration of the 2024 GRC order.

Table 88: Utah Wildfire Mitigation Plan Implementation Summary – O&M

Mitigation Program ($ Millions)	2024				2025
	Actuals	Plan (2020 WMP)[3]	Variance	Variance Description (Actual vs Plan)	Forecast
Distribution					
Risk Modeling and Drivers	$3.1	$0.0	$3.1	Internal labor costs associated with wildfire risk modeling, FHCA map development, and software licenses for wildfire risk modeling not included in 2020 WMP.	$0.0
Inspection and Corrections	$3.3	$1.9	$1.4	Cost incurred for correcting conditions and deficiencies found in the expanded FHCA.	$13.5
Vegetation Management	$3.1	$1.3	$1.8	Plan forecast was created prior to FHCA expansion in Utah. As a result, more conditions were identified. Also, the number of equipment poles to be cleared increased from previous years.	$3.6
Environmental	$0.1	$0.4	$0.3	Actual was less than plan due to environmental reviews the agency needed to complete prior to starting vegetation work; project planning conducted in 2024 and on the ground habitat work will begin in 2025.	$0.5
System Hardening	$0.5	$0.1	$0.4	Cost incurred for CFCI Data and Firmware and relay/recloser settings updates	$0.0
Situational Awareness	$3.9	$0.5	$3.4	Additional cost relates to updates to the Technosylva WFAE subscriptions	$0.7
Field Operations and Work Practices	$1.7	$0.0	$1.7	2020 WMP did not account for ESS and Emergency De-energization-related costs. Cost incurred for Rapid Response/Starlink communications, pole wrap, and support vehicle rentals.	$0.0
PSPS Program	$0.0	$0.0	$0.0	There were no PSPS events which resulted in $0 actuals.	$8.2
Public Safety Partner Coordination	$0.1	$0.0	$0.1	Cost incurred for PSPS Portal maintenance and tabletop exercises	$0.0
WMP Engagement Strategy	$0.1	$0.0	$0.1	Cost incurred for Safety and Preparedness Engagement and Wildfire Research Communication	$0.0

[3] Plan values based on the 2020 WMP exclude the mitigation program "Patrolling Costs, Field Response (PSPS) – Other," as these costs are not anticipated.

Mitigation Program ($ Millions)	2024				2025
	Actuals	Plan (2020 WMP)[3]	Variance	Variance Description (Actual vs Plan)	Forecast
Industry Collaboration	$0.1	$0.0	$0.1	The Company participated in the EPRI Climate READi program and IWRMC Membership	$0.0
Plan Monitoring and Implementation	$0.7	$0.0	$0.7	Incurred costs for the Wildfire Grant Study and Wildfire Program Delivery	$0.0
Total Distribution	**$ 16.7**	**$4.4**	**$12.3**		**$26.5**
Transmission					
Inspection and Corrections	$0.9	$0.2	$0.7	Cost incurred for correcting conditions and deficiencies found in the expanded FHCA.	$1.0
Vegetation Management	$0.3	$0.3	$0.0	N/A	$0.3
Field Operations and Work Practices	$0.8	$0.0	$0.8	Cost incurred for drone patrols and pole wrapping	$0.6
Environmental	$0.0	$0.1	$0.1	Identified work was conducted on distribution, not transmission	$0.0
Total Transmission	**$2.0**	**$0.6**	**$0.4**		**$1.9**
Total Costs	**$18.7**	**$4.9**	**$13.8**		**$28.4**

Since the filing of the 2020 WMP, there have been changes to the categorization of defined mitigation programs. Table 9 below relates mitigation programs as defined in the 2020 Wildfire Mitigation Plan to current mitigation program nomenclature.

Table 99: Categorization of Mitigation Programs – 2020 WMP to Current

Capital Mitigation Program - 2020	Capital Mitigation Program - 2025
Advanced Protection and Control	System Hardening
Environmental	Environmental
Inspect and Correct	Inspection and Corrections
Operational Practices	Field Operations and Work Practices
Situational Awareness	Situational Awareness
System Hardening	System Hardening
	Risk Modeling and Drivers
O&M Mitigation Program - 2020	**O&M Mitigation Program - 2025**
Vegetation Inspections, Mitigation, Pole Clearing – Distribution	Vegetation Management (Distribution)
Vegetation Inspections, Mitigation, Pole Clearing – Transmission	Vegetation Management (Transmission)
FHCA Inspections	Inspection and Correction
Condition Corrections – Distribution	Inspection and Corrections (Distribution)
Condition Corrections – Transmission	Inspection and Corrections (Transmission)
Weather Station Maintenance, Tool Development, Community Meetings, Advertising – Other	Situational Awareness/Field Operations and Work Practices/WMP Engagement Strategy
Fault Anticipator - Other	System Hardening
Environmental – Wildlife Protection Program, Habitat Enhancements, Other – Distribution	Environmental (Distribution)
Environmental – Wildlife Protection Program, Habitat Enhancements, Other – Transmission	Environmental (Transmission)
Patrolling Costs, Field Response (PSPS) – Other	Field Operations and Work Practices / PSPS Program
Alert Wildfire Cameras – Other	Situational Awareness
Wood Pole Wrap	System Hardening
	Risk Modeling and Drivers
	Public Safety Partner Coordination
	Industry Collaboration
	Plan Monitoring and Implementation

4 CHANGES TO THE PLAN

Significant updates during the 2024 calendar year include the following.

1. **Idle Transmission and Distribution**

The Company has confirmed all known idle and de-energized deactivated transmission lines in the service territory with an intent to remove lines that do not have a future need. The Company has confirmed that the identified lines have continued to be maintained per policy

and is collaborating with industry experts on a review to reduce risks of induced energy through grounding or partial removal until the lines can be fully removed.

The Company has completed an initial inventory of idle distribution lines and is developing a plan to reduce induction risk of idle distribution lines in correlation to the transmission lines project. Estimated costs are still in development.

2. **Wildfire Intelligence Center**

The Wildfire Intelligence Center (WIC) serves as a centralized hub for incident reporting, situational awareness, and wildfire-related data analysis across the Company's service areas, including Utah. It enhances operational safety by monitoring all-hazards threats, with a specific focus on wildfire activity. The WIC team, composed of experts in all-hazards response, wildfire response, and emergency management, supports collaboration internally across System Operations, Grid, Meteorology, and Field Operations. Utilizing advanced technologies such as AI-powered wildfire cameras and a growing catalog of incident data sources, the WIC provides stakeholders with daily situational updates, localized event reporting, and timely notifications related to wildfire risks and conditions that warrant Public Safety Power Shutoffs (PSPS).

Through industry benchmarking and collaboration, the Company identified the need for a dedicated center to increase situational awareness and improve wildfire response capabilities. Inspired by similar efforts at peer utilities like PG&E's Hazard Awareness and Warning Center (HAWC) and SCE's Wildfire Safety Operations Center (WSOC), the WIC leverages technology, wildfire management expertise, integrated weather data, and centralized information analysis to support quicker and more coordinated responses to emerging wildfire threats. The WIC is designed to serve as The Company's nerve center for wildfire intelligence and as a situational unit for ECC activations, enhancing responsiveness, improving cross-departmental coordination, and ensuring accurate interpretation of wildfire data.

Estimated Utah 2025 Cost:

Wildfire Intelligence Center (WIC): $16.4K

Watch Duty (Wildfire Intelligence Center application): $21.9K

5 COST RECOVERY

For purposes of cost recovery, the Utah Public Service Commission established a wildfire mitigation balancing account in the Company's 2020 general rate case, Docket No. 20-035-04, to track and defer the incremental revenue requirement for the capital investments and expenses to implement the approved wildland fire protection plan. The general rate case included a base level of costs in Utah rates as of January 1, 2021, and variances from the amount included in rates have been calculated and deferred on a monthly basis. The base level of costs was updated on April 25, 2025 to reflect the new base established in the 2024 GRC. The Company presents the balance of the wildfire mitigation balancing account in the results of operations reports, most recently filed in Docket No. 25-035-04 on April 28, 2025 (page 8.10). The Company is not requesting cost recovery at this time.