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June 20, 2025

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RE: UT Docket No. 25-035-38
DPU 1st Set Data Request (1-7)

Please find enclosed Rocky Mountain Power's Response to DPU 1st Set Data Request 1.1-1.7, as well as Attachments DPU 1.5-1, 1.5-2, 1.6-2, 1.6-3 and 1.6-4. Confidential Attachment DPU 1.6-1 has been uploaded to BOX. Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601–606.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

_____/s/_____
Jana Saba
Manager, Regulation

Enclosures

DPU Data Request 1.1

Wildland Fire Mitigation Plan – When the company rebuilt lines in 2022, 2023, or 2024 under the Utah WMP, did it upgrade equipment to support a higher capacity or load on those lines? Describe the characteristics (capacity, materials, and length) of all original lines as well as characteristics of all rebuilt lines under the plan.

Response to DPU Data Request 1.1

Projects were not selected based on capacity requirements; rather, they were chosen and mitigated based on wildfire risk. During the design phase, load and forecasted load were modeled to ensure that the selected conductors and cables met both current and projected demand.

Additionally, the existing system contains a variety of conductor types and sizes. When upgrades occur, the company utilizes current standard conductor sizes.

Nearly all line rebuild projects involve selecting a standard conductor size within the loading range for that conductor which will have some additional capacity to avoid a reconductoring effort for small load increases. No other equipment in projects delivered between 2022 and 2024 included capacity upgrades.

The Company does have a planned project currently under construction: the Cottonwood-Snyderville 138 kilovolt (kV) Rebuild. This initiative includes converting two 46 kV substations to 138 kV, allowing for the removal of a 15-mile, 46 kV line through Parley's Canyon. Upgrading the substation facilities was determined to be more cost- and risk-effective than rebuilding the 46 kV line and provides additional capacity to the area.

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DPU Data Request 1.2

DPU Data Request 1.2

Wildland Fire Mitigation Plan – If so, please provide supporting documents showing how many miles were upgraded in 2022, 2023, and 2024 to support a higher capacity. Please include details such as descriptions of the projects, names of lines replaced, locations, load capacity of old line, load capacity of new line.

Response to DPU Data Request 1.2

Please refer to the Company's response to DPU Data Request 1.1.

DPU Data Request 1.3

Wildland Fire Mitigation Plan – Please provide the Utah Wildfire Mitigation Plan costs incurred for 2022, 2023, 2024. For each year, what amounts were incurred to rebuild the lines? What amounts were incurred to remediate or rebuild the areas burned in fires related to: (a) the 2020 Labor Day fires in Oregon and (b) all other fires?

Response to DPU Data Request 1.3

Actual wildfire mitigation plan (WMP) costs incurred for 2022, 2023 and 2024 are provided in the cost and compliance reports that are produced each calendar year no later than the first of every June. The cost and compliance reports are publicly available and can be accessed by using the following website links:

[2022 Costs Incurred](#)

[2023 Costs Incurred](#)

[2024 Costs Incurred](#)

- (a) No WMP costs were incurred in Utah because of the 2020 Labor Day fires in Oregon.
- (b) No WMP costs were incurred because of other fires. System hardening was targeted towards the Company's Utah fire high consequence areas (FHCA).

DPU Data Request 1.4

Wildland Fire Mitigation Plan – Provide the amount the Company anticipated spending, including any internal budgets approved by the Company for WMP implementation, for 2021, 2022, 2023, and 2024. Also please provide the amounts actually spent and assigned by the Company to the Utah WMP for each of those years.

- (a) If the amount spent exceeded the amount anticipated, please detail the internal notification process, if any, used to identify whom at the Company would be informed of the amount spent compared to the amount estimated.
- (b) Please describe any internal processes for communicating budget status and exceedance in the WMP program.

Response to DPU Data Request 1.4

The Company responds to this request in two sections: (1) capital, and (2) operations and maintenance, and administrative and general (OMAG).

1. Capital:

Capital ¹ WMP Budget & Actual				
Year	2021	2022	2023	2024
Budget	\$50.6m	\$70.5m	\$65m	\$100m
Actual	\$23.4m	\$78.3m	\$103.7m	\$178.1m

- (a) The internal notifications for exceeding budget are accomplished through monthly forecasting reports that are sent to executive management for review. Also, all capital projects require an Appropriation Request (APR) to be approved and if projects exceed the original authorized budget a Project Change Notice (PCN) is required to be submitted justifying the additional costs. APRs and PCNs \$1 million to \$3 million are reviewed and approved at the director level. APRs and PCNs \$3 million to \$25 million are reviewed and approved at the vice president (VP) level. APRs and PCNs over \$25 million are reviewed and approved at the chief executive officer (CEO) level.
- (b) Every month, year-to-date actuals are reviewed as well as project forecasts going forward. If the yearly forecast shows that the budget will be exceeded, it is shown in the forecast report that is sent to executive management.

¹ Values indicate capital expenditures and not plants placed in service and will not match the GRC values.

2. OMAG:

OMAG Budget & Actual				
Year	2021	2022	2023	2024
Budget	\$2.5m	\$5.0m	\$7.5m	\$11.1m
Actual	\$6.0m	\$12.3m	\$17.9m	\$18.3m

- (a) The internal notifications for when OMAG exceeds budget are accomplished through monthly OMAG actuals/plan/variance reports that are sent to executive management for review. These reports show the variance for the current month (actuals compared to forecast and budget), year to date (actuals compared to budget) and the full year forecasted variance to budget. These reports highlight key drivers for budget variances, including wildfire activity. Also included in the monthly performance reports provided to power delivery management is a wildfire safety section that includes specifics in regards to capital and OMAG spending. Please refer to the Company's response to DPU Data Request 1.5, specifically Attachment DPU 1.5-2.
- (b) Each month, a Utah Wildland Fire Balancing Account report is prepared that shows the actual Utah OMAG expenses by month, and the forecast for future months, compared to the amount in the approved wildfire mitigation plan (WMP). The actuals are captured for each wildfire mitigation activity (vegetation management, weather station maintenance, field response costs, condition corrections, etc.). This report is provided to RMP T&D management in monthly performance reports. Please refer to the Company's response to DPU Data Request 1.5, specifically Attachment [See attachments DPU 1.5a-d].

DPU Data Request 1.5

Wildland Fire Mitigation Plan – Please provide emails or other communication documents related to the WMP budget being exceeded, including internal and external responses to any notification of exceeding the WMP implementation budget for the following years: 2021, 2022, 2023, and 2024.

Response to DPU Data Request 1.5

Rocky Mountain Power objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objection, the Company responds as follows:

Please refer to the Company's response to DPU Data Request 1.4 which provides an overview of the internal management notification processes. Please refer to Attachment DPU 1.5-1 and Attachment DPU 15.2 which provide examples of the monthly performance reports provided to power delivery's executive team. .

For external notification, the Company uses the cost and compliance reports to show actuals for the prior year and the current year's forecast. PacifiCorp's cost and compliance reports are publicly available and can be accessed by using the following website links:

[2024 Actual Costs Incurred](#)

[2023 Actual Costs Incurred](#)

[2022 Actual Costs Incurred](#)

[2021 Actual Costs Incurred](#)

DPU Data Request 1.6

Wildland Fire Mitigation Plan – For questions 1.6(a) through 1.6(d), please refer to Josh Jones’s testimony in Docket 24-035-04 RMP GRC (see page 165, lines 13-14 of March 25, 2025, hearing transcript) where he described a “detailed governance process” with multiple voting members.

- (a) Please list the names of the members involved in this governance process and what positions they hold in their respective organizations or departments. Please describe the process through which decisions are made, including voting processes, if any. If the process involves voting and non-voting members, please indicate who are voting members and who are non-voting members.
- (b) Please provide any by-laws, operating procedures, and process documents created that dictate or describe the governance process.
- (c) In these meetings held by members of the governance process, was the 2023 and 2024 WMP budget (amount approved from the 2020 WMP for 2023 and 2024) discussed as part of those committee meetings?
- (d) Please provide minutes of all governance process meetings held in 2024 and 2025.

Response to DPU Data Request 1.6

Rocky Mountain Power objects to this request as overly broad, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible information. Without waiving any objection, the Company responds as follows:

- (a) Members and Voting Members Responsibility by title:

- PacifiCorp Capital Governance Process:

Position	Role
Dir, Regional Investment Delivery	Capital Governance
Asset Planning Mgr	Capital Governance
Fin/Actng Spclst	Capital Governance
Sr Business Spclst	Capital Governance
Investment Delivery Mgr	Capital Governance
Assoc Investment Delivery Mgr	Capital Governance
Investment Delivery Mgr	Capital Governance
Investment Delivery Mgr	Capital Governance
Investment Delivery Mgr	Capital Governance

1. All capital projects require an Appropriation Request (APR) to be approved. APRs \$1 million to -\$3 million are reviewed and approved at the director level. APRs \$3 million to \$25 million are reviewed and approved at the vice president (VP) level. APRs over \$25 million are reviewed and approved at the chief executive officer (CEO) level. Please refer to Confidential Attach DPU 1.6-1 which provides a copy of PacifiCorp's Corporate Governance and Approvals Policy.
- Scoping Committee Members: Note that the "VP, Asset Management & Wildfire Strategy" position title was updated in the June 2025 Wildfire Scope Meeting and is the correct title for this position. Please refer to Attachment DPU 1.6-2 which provide copies of the Wildfire Scope Meeting minutes.

Position	Committee Role
SVP, Power Delivery	Executive Sponsor
VP, T&D Operations	Voting Member
VP, System Operations	Voting Member
VP, Asset Management & Wildfire Strategy	Voting Member
VP, Engineering & T&D Standards	Voting Member
VP, Project Management	Voting Member
VP, RMP Operations	Voting Member
VP, PP Operations	Voting Member
Managing Director, Technical Services and Training	Advisor
Managing Director, Delivery Assurance	Advisor
Managing Director, Asset Management	Advisor
Director, Asset Investment Strategy and Policy	Advisor
Director, Field Engineering	Advisor
Director, Wildfire PMO	Advisor
Director, Wildfire Program Delivery	Advisor
Director, Asset Risk	Advisor
Director, Wildfire Plan	Advisor
Director, Wildfire Plan	Advisor
Sr Engineer / Project Manager, Wildfire Scoping	Advisor

1. The governance process described by Company witness, Josh Jones in Docket 24-035-04 (general rate case (GRC)), as referenced on page 165, lines 13–14 of the March 25, 2025, hearing transcript, pertains to the internal review that occurs during the engineering scoping phase of line rebuild projects. The Wildfire Mitigation Plan (WMP) identifies several distribution and transmission lines located within Fire High Consequence Areas (FHCA). These areas represent the highest wildfire risk and have been prioritized for mitigation with long-term mitigation solutions like covered conductor installations or undergrounding. The wildfire scoping governance process reviews the scope and extent of proposed mitigation measures. Items requiring a committee vote include any deviations from the approach identified in

the WMP. For instance, if a project is proposed and engineering recommends extending the rebuild beyond the FHCA boundary, committee approval would be required before proceeding. This is a preliminary approval of the scope of work prior to the review of a detailed scope and a financial review and approval, which is governed by different processes. A list of members that attend the committee is shown below.

- Project Scope Review and Advisory Team (PSRAT) Members:

Position	Voting Status
Scoping Manager	Non-Voting
Scoping Project Manager	Non-Voting
P&C Sr. Engineer	Non-Voting
Substation Sr. Engineer	Non-Voting
Substation Engineer	Non-Voting
Civil Principle Engineer	Non-Voting
Communications Engineer	Non-Voting
SCADA Engineer	Non-Voting
Transmission Engineer	Non-Voting
Metering Sr. Engineer	Non-Voting
Project Control Specialist	Non-Voting

1. The purpose of the PSRAT meeting is to ensure alignment and clarity for all projects as each transition from planning to execution. The meeting focuses on reviewing detailed engineering scoping documents based on planning studies outlined in a 10-year plan. It also provides a critical opportunity for the planning, engineering, and investment delivery teams to confirm that the defined scope accurately reflects the original planning intent. This collaborative review helps prevent scope creep by ensuring that no additional or unintended elements have been introduced into the project scope.

- Engineering Review (EREV) Members:

Position	Role
Vice President of Operations	Voting Member
Managing Director of T&D Grid Plan and Power Quality	Voting Member
Director of Investment Delivery	Voting Member
Director of Substation Operations	Voting Member
Investment Delivery Manager	Member

1. EREV is a weekly meeting where Engineers bring in large projects for scoping and cost review. Engineers are challenged with their design for accuracy and lowest cost solution.

(b) Please refer to the Company's response provided below:

- Capital Governance Process: Please refer to Confidential Attachment DPU 1.6-1 which provides a copy of PacifiCorp's Corporate Governance and Approvals Process.
- Scoping Governance Committee: The purpose and intent are documented in each meeting agenda.
- PSRAT: Please refer to Attachment DPU 1.6-3 which provides a copy of the PSRAT process and policy documentation. The purpose and intent are documented in each meeting.
- EREV: The purpose and intent are documented in each meeting agenda.

(c) The overall wildfire budget is generally not discussed in these meetings. The purpose of the scoping meetings is to review scoping and proposed mitigation from an engineering and risk reduction standpoint. The Capital Governance process confirms formal financial approval, forecasting and budget impact.

(d) These scoping review meetings and governance process started in May 2024 and are held monthly as needed.

EREV – please refer to Attachment DPU 1.6 “EREV WF Log”.

PSRAT meeting minutes are not specifically maintained for wildfire.

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601 to 606.

DPU Data Request 1.7

Wildland Fire Mitigation Plan – For questions 1.7(a) through (d) please refer to Josh Jones’s testimony in Docket 24-035-04 RMP GRC (see page 170, lines 3-6 of March 25, 2025, hearing transcript). Mr. Jones said that “we looked at how much work could occur each year based on resources, availability, material, and things”.

- (a) What does the term “resources” refer to?
- (b) Does “resources” include the remaining budget from the mitigation plan? If not, is there a different budget being used for the WMP internally by PacifiCorp, set by the finance division/board/other internal company process?
- (c) If so, please provide documentation of the internally set budget.
- (d) If there was not an internally set budget, what process did the Company use to project cash flows and needs for implementing the WMP in the absence of a budget?

Response to DPU Data Request 1.7

- (a) “Resources” refers to labor resources, special skilled personnel and equipment which have limited availability. This includes field crews, contract resources, design staff and permitting staff.
- (b) “Resources” does not reference budget. Budget information is provided with the Company’s response to DPU Data Request 1.4.
- (c) As stated in the Company’s response to subpart (b) above, “resources” does not refer to budget.
- (d) Internal budgets are set each year. As stated in the Company’s response to DPU Data Request 1.4, budgets and forecasts are regularly reviewed.