Rocky Mountain Power
Docket No. 25-035-61
Witness: Kevin Benson

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Direct Testimony of Kevin Benson

November 2025

I. INTRODUCTION OF WITNESS AND QUALIFICATIONS

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or the "Company").

A. My name is Kevin Benson, and my business address is 21000 Cooley Road, Bend, Oregon 97701. I am currently employed as Managing Director, Asset Risk and Performance for PacifiCorp.

Q. Please summarize your education and business experience.

A. I have a Bachelor of Arts degree in Political Science and History from Boston College and a Master of Business Administration degree from the University of California, Berkeley Haas School of Business. From 2009 to 2016, I was a Submarine Officer in the United States Navy. After completing business school, I was employed at Pacific Gas and Electric from 2018 to 2022 supporting wildfire safety operations and the Public Safety Power Shutoff program. I joined PacifiCorp in May 2022 and assumed the role of Director, Asset Risk in August 2022 with responsibility for long-term wildfire risk analysis, reliability reporting, and internal software development. In March 2025, I received the title of Managing Director, Asset Risk and Performance.

Q. Have you appeared as a witness in previous regulatory proceedings?

A. No.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your direct testimony?

A. My testimony supports Rocky Mountain Power's creation of a Utah Fire Fund (the "Fire Fund"). My testimony discusses the potential for large, consequential wildfires in Utah based on risk modeling and supports the establishment of the Utah Fire Fund

as a reasonable and prudent approach to meeting challenges posed by wildland fire risk in Utah.

Q. Please summarize your direct testimony.

A. Utah faces significant and growing exposure to large, potentially catastrophic wildfires. The State of Utah has recognized this risk for many years including the 2013 findings of the Catastrophic Wildfire Reduction Steering Committee established after the 2012 fire season.[1] Rocky Mountain Power's risk modeling shows an increasing potential for these wildfires. This analysis was affirmed by the Utah Division of Forestry, Fire, and State Lands ("FFSL") and by an independent evaluator selected by the Public Service Commission of Utah ("Commission") during Rocky Mountain Power's 2024 general rate case. These findings are also consistent with those of the Federal Emergency Management Agency ("FEMA") National Risk Index ("NRI") and the Utah Enhanced State Hazard Mitigation Plan. Fire activity in 2025 is a recent example of the potential impacts of wildfires in Utah.

Q. Please describe the risk of a major wildland fire event in Utah.

A. While I am not an expert on wildfire science, the sources and analyses discussed below support the conclusion that many locations in Utah have the potential for catastrophic wildfires. According to FFSL, on average more than 93 percent of wildfires in Utah are extinguished before exceeding ten acres burned.[2] As noted in the Wildfire Management in Utah report, however, "While 93% of fires [in 2024] were contained at 10 acres or less, large, catastrophic fires remain a significant concern, threatening water quality,

[1] *See* Utah Department of Agriculture and Food, *Catastrophic Wildfire Reduction Strategy* (2013). https://ag.utah.gov/documents/CatFireFinalReport120213.pdf

[2] Utah Division of Forestry, Fire and State Lands, *Wildfire Management in Utah*, at 7 (2025) ("*Wildfire Management in Utah*"). About Fire | Utah DNR – FFSL (Forestry, Fire and State Lands)

soil, air, safety, and economic stability. Fire is ecologically beneficial in many ecosystems, but unusually large fires become detrimental."[3] Rocky Mountain Power has developed extensive risk modeling, relying on utility industry and wildfire modeling best practices, to identify locations in its service territory where this risk exists.

Q. What has the Company's risk modeling shown?

A. Rocky Mountain Power has identified approximately 11.3 percent of its service territory as Fire High Consequence Areas ("FHCA"). The map below shows these areas, with reference to the previously mapped 2020 FHCA and the new areas identified in 2023.

[3] Final Wildfire Management Report.

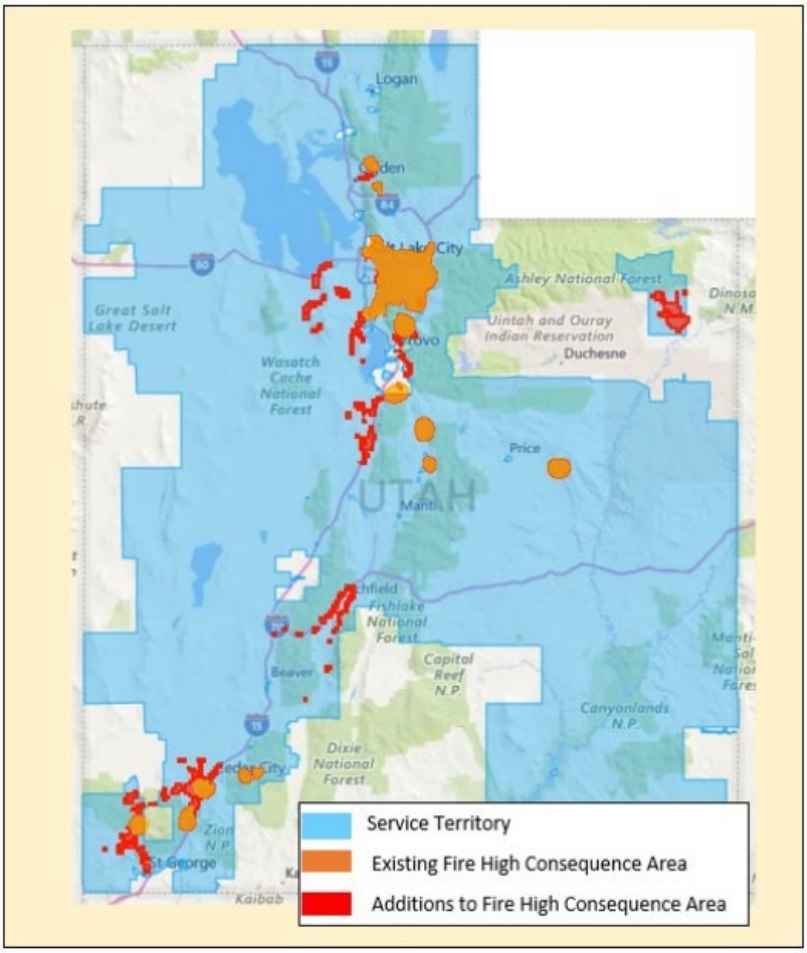


Figure 12: 2024 Additions to the FHCA within Rocky Mountain Power Service Territory

The FHCA are locations with the highest risk for consequential wildfires based on the Company's wind-driven and fuel/terrain-driven wildfire risk scores. The maps below provide a side-by-side comparison of the FHCA with the Utah Wildfire Risk Assessment Portal ("UWRAP") wildfire risk map showing general alignment between the Company's risk analysis and that produced by FFSL.

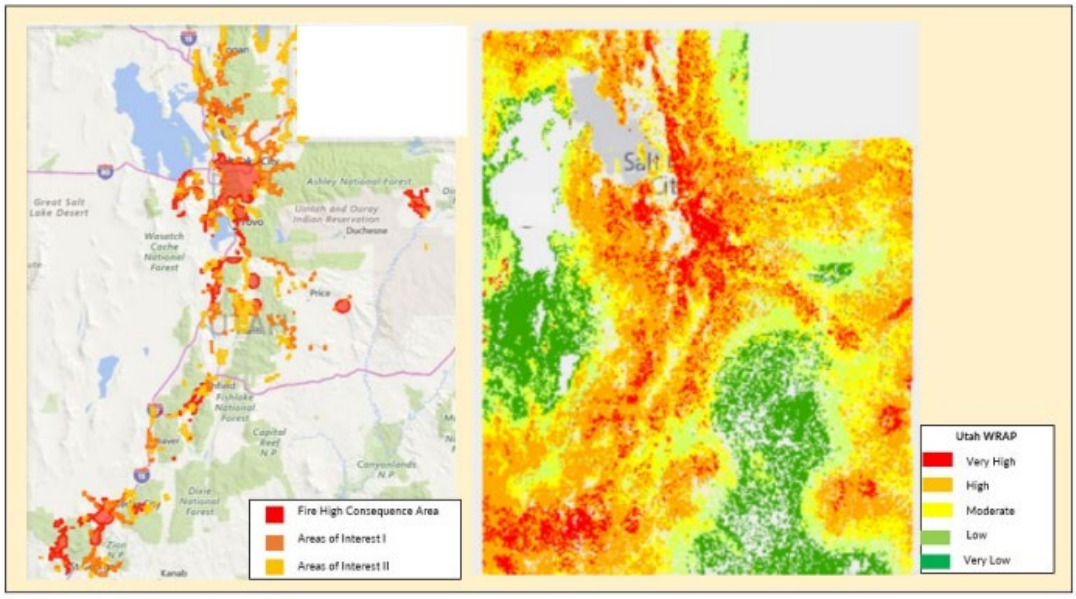


Figure 14: Comparison of Rocky Mountain Power FHCA to Utah Wildfire Risk Map

Q. Has the Company's risk modeling approach been reviewed by an independent third party?

A. Yes. In the Company's 2024 General Rate Case, the Commission retained an independent evaluator, Charles River Associates ("CRA") to evaluate the Company's wildfire mitigation plan to determine whether the Company properly assesses wildfire risk. In its Report, CRA determined:

> "After a thorough assessment of RMP's processes, programs in development and future initiatives, CRA finds that RMP's overall approach to risk assessment aligns with industry best practices. … RMP's risk assessment practices demonstrate a detailed understanding of wildfire hazards, considering factors such as topography, vegetation, structure density, and asset locations. This approach helps identify ignition risks from energized equipment and potential consequences, while resilience investments—like fire wraps on wooden poles—and operational practices further protect critical assets and infrastructure."[4]

[4] *In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations,* Docket No. 24-035-04, Charles River Associates, Independent Evaluation of Rocky Mountain Power's Utah 2023-2025 Final Wildfire Mitigation Plan, at 10 (January 10, 2025).

Q. Does the FFSL also conduct assessments of Utah's wildfire risk?

A. Yes. Among other projects, FFSL maintains the UWRAP to assess wildfire risk across the state.

Q. Has the Company's risk modeling approach been reviewed by FFSL?

A. Yes. In the Company's 2024 General Rate Case, Mr. Michael Melton testified on behalf of FFSL that "In short, Forestry, Fire and State Lands agrees that Rocky Mountain Power has properly assessed the wildfire risk…"[5] and referred to his written testimony that "FFSL agrees with the IE Report that RMP properly assessed wildland fire risk."[6]

Q. What additional support does the Company have to show the risk of a major wildland fire event in Utah?

A. The Utah Enhanced State Hazard Mitigation Plan includes locations in Utah susceptible to wildfires using both state agency analyses and the FEMA NRI.[7] This document describes in detail the wildfire risk exposure of Utah residents and their property. The Utah Enhanced State Hazard Mitigation Plan notes that the NRI indicates multiple counties in Utah have relatively high expected annual losses due to wildfire.[8] For example, Utah County is within the top three percent of at-risk counties in the United States with expected annual losses of $163,956,330; Washington County is within the top five percent with expected annual losses of $108,927,468; and Salt Lake County is within the top one percent with expected annual losses of $316,213,382.[9]

[5] *Id.,* Phase III Hr'g Tr. at 269:10-12, (March 26, 2025).
[6] *Id.*, Utah Division of Forestry, Fire, & State Lands' Phase III Direct Testimony of Mike Melton at 6 (February 14, 2025).
[7] Utah Division of Emergency Management, *Utah Enhanced State Hazard Mitigation Plan*, at 4-291 - 4-292 (2024).
[8] *Id.*
[9] *See* Federal Emergency Management Agency, *National Risk Index Map,* available at: https://hazards.fema.gov/nri/map (last visited November 20, 2025).

Rocky Mountain Power also participated in efforts by the Electric Power Research Institute to develop a framework to guide utilities in developing resilience strategies and mitigation plans for wildfire and other weather-related risks. Rocky Mountain Power is currently working with the Argonne National Laboratory Center for Resilience and Decision Science to apply this framework by developing projections of future fire weather activity within its service territory due to climate change. This study will provide estimates of changes to seasonal and extreme fire weather trends to identify locations more susceptible to large, potentially catastrophic wildfires in the period 2045-2054 compared to historical levels from 1995-2004.

Q. Please describe the findings of the Argonne National Laboratory Center for Resilience and Decision Science.

A. Preliminary results show more extreme fire weather in Utah, particularly around Salt Lake City and in southwestern Utah, and seasonal fire weather activity shifting to earlier in the spring. As noted by FFSL, "Historically, Utah's wildfire 'season' has been June through October, although recent years have demonstrated that wildfires can occur any time."10 The analysis by ANL supports a similar conclusion while indicating this pattern is likely to worsen over time.

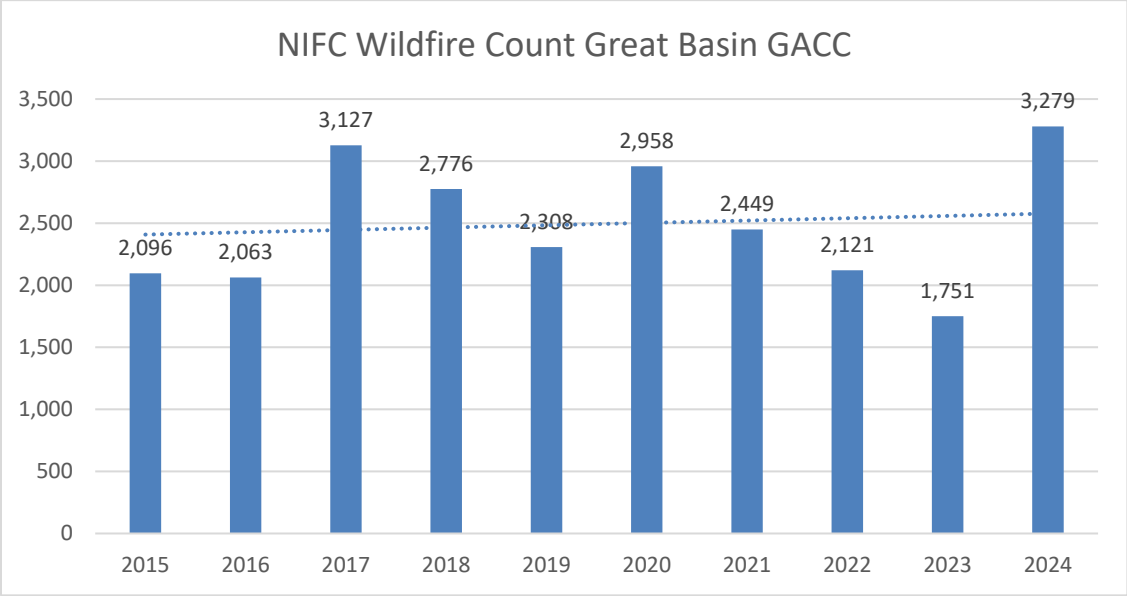
Q. Has Utah experienced catastrophic wildfires in recent years?

A. While perhaps not catastrophic, Utah experienced notable wildfires in 2025. The Monroe Canyon Fire burned approximately 74,000 acres in Sevier and Piute counties, leading to a declared state of emergency and destroying ten residential structures and four outbuildings. The France Canyon Fire burned approximately 35,000 acres in June

and July. The Forsyth Fire burned approximately 16,000 acres and destroyed fourteen residential structures and four outbuildings.

Q. Does the 2025 fire season experience mean Utah does not have significant risk in the future of a major wildfire event?

A. Unfortunately, the opposite appears to be the case. National Interagency Fire Center data for the Great Basin Geographic Agency Coordination Center (Utah, Nevada, and southern Idaho) shows an increase in wildfire counts from 2015 to 2024.



More recently, as November 20, 2025, the Utah Department of Natural Resources reports 1,153 fires burning 164,788 acres in 2025 compared to 1,244 wildfires with 90,660 burned acres in 2024.[10] Combined with projections of worsening seasonal and extreme fire weather conditions from the ANL study, the data shows an increase in wildfire impacts in Utah. While there will be significant variability year-to-

[10] *See* Utah Department of Natural Resources, *Utah Wildfire Information*, *available at:* https://utah-fire-info-utahdnr.hub.arcgis.com. (last visited November 20, 2025) (2025 statistics); *Wildfire Management in Utah*, at 7 (2024 statistics).

year in the number of wildfires, acres burned, or impacts on people and property, the trend is clear: the risk of large wildfires in Utah will continue to increase.

Q. Does this conclude your direct testimony?

A. Yes.