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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: December 1, 2025

Re: **Docket No. 25-066-01**, Dixie Power's 2025 Wildland Fire Protection Plan Annual Compliance Report.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Dixie Power's 2025 compliance filing as complying with Utah Code § 54-24-203(4)(b). The Division also recommends that Dixie Power provide additional information with future compliance filings.

The Division recommends Dixie Power consider:

1. Providing year-end data from 2025 in the 2026 compliance report.
2. Reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of report.
3. Submitting its annual compliance report for the previous year's activities to its governing board by June 1st.
4. Reporting the actual metrics (including performance 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.



5. Reporting annual mitigation data and costs by category to ensure accountability, comparability, and transparency of plan.

Issue

On November 7, 2025, Dixie Power filed a copy of its annual Wildland Fire Protection Plan compliance report (Compliance Report). On November 8, 2025, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations by December 8, 2025. This memorandum represents the Division's response to the Action Request.

Discussion

Dixie Power 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).

Dixie Power submitted its 2025 Compliance Report to its governing authority, which is its Board of Directors, on November 4, 2025, and it was "duly accepted by the Board."¹ The Compliance Report was then filed with the Commission on November 7, 2025.

The Compliance Report submitted by Dixie Power reported the current statistics for the service area, as shown² below:

County, State	Customers	Acres	Miles of Transmission	Substations	Miles of OH Distribution	Miles of UG Distribution
Milliard, UT	615	181,145	5	2	151	11
Iron, UT	1,106	759,843	32	6	232	36
Washington, UT	30,745	219,777	123	16	151	709
Mohave, AZ	3,621	272,477	28	3	112	41
TOTALS	36,087	1,433,242	188	27	646	797

¹ 2025 Compliance Report for the 2023-2026 Wildland Fire Protection Plan for Dixie Power, Nov 5, 2025.

² *Id.*

In addition, the Company reports to have replaced 6 miles of old poles and wire on a distribution line and a transmission line within a medium wildfire risk area along Highway 56 between Beryl Junction and Newcastle. Furthermore, photos were included to show the work on the new distribution and transmission lines.

Recommendations

Given that Dixie Power's report was submitted in early November of the current year, there is not a way to report a full year's activity for 2025, as November and December activities are excluded from the filing. The division recommends that annual reports are reported on a full 12-month calendar year basis.

In addition, Dixie Power did not report expenditures made for the reporting year's activities. The Division recommends that cooperative electric utilities include reporting metrics for expenditures related to fire mitigation activities. Reporting metrics should include annual data regarding the activities detailed in the plan. In addition, expenditures for activities such as vegetation management, pole inspections, public safety power shutoff activities, relays, and line rebuild projects provide additional insights to the governing board, ratepayers, and to the public. The performance metrics specifically listed in the 2023 WFPP include: Utility caused ignitions, Vegetation-caused outage during fire season, Vegetation-caused ignition. These performance metrics were not reported in this report.

The Division highlights that Utah Code § 54-24-203 is currently silent on an annual submission date 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 consider setting a date for electric cooperatives' cost and compliance reports. Establishing a submission deadline could eliminate ambiguity and ease review for all parties.

Conclusion

Based on its review of the filing, the Division recommends that the Commission acknowledge that Dixie Power 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. Dixie Power should consider including year-end data from 2025 in its 2026 cost and compliance report.
2. Dixie Power may wish to report on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of report.
3. Dixie Power should determine whether 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.
4. Dixie Power should report the actual metrics (including performance metrics) and costs for the current year next to the planned goals and budgets from the approved plan. This could help ensure accountability and transparency of implementation while increasing the value of its data.
5. Dixie Power should report annual mitigation data and costs by category to ensure accountability, comparability, and transparency of the plan.

cc: LaDel Laub, Chief Executive Officer, Dixie Power
Michele Beck, Office of Consumer Services