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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
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Jonathan Lee, Utility Analyst

Date: February 28, 2025

Re: **Docket No. 25-506-01**, Deseret Power Electric Cooperative's 2024 Wildland Fire Protection Plan Annual Compliance Report.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge with recommendations Deseret Power Electric Cooperative's (DPEC or Company) February 13, 2025; 2024 Wildland Fire Protection Plan Annual Compliance report as complying with Utah Code §54-24-203(4)(b).

Issue

On February 13, 2025, Deseret Power Electric Cooperative filed a copy of its annual Wildland Fire Protection Plan (WFPP) Compliance Report (Compliance Report) for the calendar year 2024. On the same date, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations. The Commission asked the Division to report back by March 14, 2025. This memorandum represents the Division's response to the Action Request.



Discussion

Deseret Power is a non-profit rural electric distribution cooperative. Utah Code §54-24-203(4) requires electric cooperatives to (a) file with the governing authority an annual report detailing the electric cooperative's compliance with the WFPP; and (b) file with the Commission a copy of the annual compliance report. Deseret Power's Compliance Report was presented to its governing authority at a regular board meeting that was held on November 21, 2024, and was then filed with the Commission on February 13, 2025

Quoting from the Compliance Report submitted by Deseret Power, the following actions were taken by the Company in 2024¹:

- DPEC strategically placed 5 weather stations across various locations to monitor environmental conditions which will provide real-time data on temperature, humidity, wind speed, and precipitation, enabling proactive risk management decisions. The stations were placed at:
 - Cobble Rock (near Nephi, highway 132 and Nebo loop road)
 - Thistle Junction (near junction of highway 6 and highway 89)
 - Sheep Creek (near highway 6 and the Sheep Creek Rd 051)
 - Vernal (5 miles southeast of Vernal city)
 - Calamity (9 miles northeast of Rangely, CO.)
- DPEC replaced conductor insulator strings on dead-ends 125 & 565 (B-phase).
- DPEC replaced 16 static insulators near Duchesne and 40 near Thistle and installed a conductor repair rod on a damaged (gunshot) wire near STR 186.
- DPEC replaced 9 tangents between BNZ and Roosevelt, totaling 243 insulators on the Upalco 138 line, and replaced 8 static insulators on the line.
- DPEC conducted extensive cutting and clearing operations in areas identified as having heightened risk of wildland fire. Following industry best practices and its approved vegetation management protocols, DPEC cleared a 150' wide area between structures 589-604 on the Bonanza-Mona 345kV Transmission line, with

¹ See Deseret Power's 2024 Wildland Fire Protection Plan Annual Compliance Report, February 13, 2025.

additional cutting planned for 604-610. This focused on juniper trees, which are particularly labor-intensive to cut.

The Division has reviewed the filing and recommends the Commission acknowledge that Deseret Power has complied with Utah Code §54-24-203(4)(b).

Recommendation

The Division recommends that in the future DPEC's annual compliance reports should include associated costs so that the Commission has a better understanding of how much it is costing the Company. The Division also recommends that DPEC acknowledge and confirm positively that the Inspection Procedure, in section 5.1 of its WFPP, is being adhered to on the various lines, distribution overhead feeders, and taps; including meeting its goal of 10% inspection of its poles each year and routine, as specified, and bi-annual inspections of its substations as per its Program Inspection summary. A comparison to prior year numbers and costs may also give better context for comparison purposes. Finally, the Division recommends that it may also be helpful to cross-reference the work being performed to sections of DPEC's WFPP.

Conclusion

Based on its review of the filing, the Division recommends the Commission acknowledge with recommendation that Deseret Power has complied with the filing requirements for the Compliance Report under Utah Code § 54-24-203(4)(b).

cc: Michele Beck, Office of Consumer Services
Jeffrey M Peterson, DPEC General Counsel