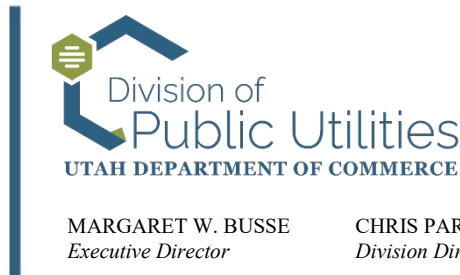


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Lieutenant Governor



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Division Director

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: February 4, 2026

Re: **Docket No. 26-022-01**, Bridger Valley Electric Association's 2026 Wildland Fire Protection Plan Compliance Report

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) acknowledge Bridger Valley Electric Association's (BVEA) 2026 compliance filing as complying with Utah Code § 54-24-203(4)(b). The Division also recommends that BVEA provide additional information with future compliance filings.

In accordance with suggestions provided to other electric cooperatives, the Division recommends that BVEA consider:

1. Reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. Submitting its annual compliance report for the previous year's activities to its governing board by June 1st.
3. 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.



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

Issue

On January 20, 2026, BVEA filed a copy of its annual Wildland Fire Protection Plan compliance report (Compliance Report). 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 by February 19, 2026. This memorandum represents the Division's response to the Action Request.

Discussion

BVEA is a non-profit rural electric distribution cooperative. Utah Code § 54-24-203(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).

BVEA submitted its 2026 Compliance Report, detailing mitigation actions taken in 2025, to its governing authority on January 20, 2026. The Compliance Report was filed with the Commission on the same date.

The Compliance Report submitted by BVEA reported that it took the following mitigation actions in 2025:

- BVEA trimmed trees in Dutch John, UT and Manila, UT between January and April.
- BVEA hired Uinta County Weed and Pest to spray 13 miles of a distribution line between pole R332 and pole R812.
- BVEA hired Uinta County Weed and Pest to spray 4.6 miles of a distribution line between pole K1137 and pole K341.
- BVEA sprayed 8.5 miles of right of way property inside Lancer Ranch, Manor Lands, and Pine Plateau associations.
- BVEA hung flyers in Summit County to inform customers about protecting homes and properties from wildfires.

- BVEA tested poles on the M line distribution circuit, starting at pole M1, and included all poles in Flaming Gorge and Dutch John, UT.
- BVEA placed all reclosers on non-reclose settings in the Bear River, Summit County areas from June 26, 2025 to October 1, 2025.

Additionally, BVEA reports spending \$89,509 on tree trimming efforts and right of way work in 2025. BVEA also reports adhering to the annual inspection schedule specified in section 5.1.1 of its Wildland Fire Mitigation Plan (WMP)¹, and it tested 592 poles in 2025. Finally, BVEA worked with the Command center during the Beulah fire, which occurred near its service territory. BVEA did not report that any of its facilities were affected by the fire.

Recommendations

Division recommendations found in this filing are consistent with its recommendations in other electric cooperative dockets² and are provided to standardize reporting recommendations across all electric cooperatives. The Division recommends that annual reports be completed on a full 12-month calendar-year basis, and that annual reports are submitted to electric cooperatives' governing bodies by June 1st for the previous year. The Division also recommends electric cooperative utilities include separate reporting metrics for expenditures related to fire mitigation and fire suppression, as the activities of each can differ.

The Division highlights that Utah Code § 54-24-203 is currently silent on an annual submission deadline 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 1st. 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.

¹ Docket No. 23-022-01, Bridger Valley Electric Association's Wildland Fire Protection Plan.

² Docket Nos. 25-025-01, 25-028-06, 25-032-01, 25-066-01; DPU Comments.

Conclusion

Based on its review of the filing, the Division recommends that the Commission acknowledge that BVEA has complied with the filing requirements for the 2026 Compliance Report under Utah Code § 54-24-203(4)(b). In accordance with the suggestions provided to other electric cooperatives, the Division also provides the following suggestions:

1. BVEA should consider reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. BVEA should consider submitting its annual compliance report to its governing authority for the previous year's compliance by June 1st. This could provide clarity and simplify its tasks and others' review.
3. BVEA's report of the actual metrics and costs for the current year next to the planned goals and budgets from the approved plan could help ensure accountability and transparency of implementation while increasing the value of its data.
4. If BVEA reports fire suppression costs, reporting them separately from mitigation costs can provide a fuller, more accurate picture of its activities and their effects.

cc: Bob Larsen, BVEA Operations Manager
Michele Beck, Office of Consumer Services