

SPENCER J. COX
Governor
DEIDRE M. HENDERSON
Lieutenant Governor



MARGARET W. BUSSE
Commissioner

CHRIS PARKER
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: August 4, 2026

Re: **Docket No. 26-030-05**, Moon Lake Electric Association Wildland Fire Protection Plan.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Moon Lake Electric Association, Inc.'s (MLEA) 2026 Wildland Fire Protection Plan as complying with Utah Code § 54-24-203 (1-3). The Division also provides the following recommendations for (MLEA) to consider when compiling its future Wildland Fire Protection Plans: (1) the utility should add a section that specifically outlines planned mitigation efforts for each year in the plan; (2) the utility should include forecasted expenditures for each year in the plan; and (3) the utility should include the date the plan was approved by its Board of Directors.

Issue

On July 8, 2026, MLEA filed its Wildland Fire Protection Plan (WFPP). 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 with a due date of August 7, 2026. This memorandum represents the Division's response to the Action Request.



Background

MLEA is a non-profit rural electric distribution cooperative. Utah Code § 54-24-203 requires an electric cooperative to submit its WFPP to its governing authority on or before October 1 every third year after calendar year 2020. The WFPP submitted by MLEA includes content relating to wildfire risk analysis, wildfire prevention strategies and protocols, community outreach and education, etc. The purpose of this filing is to comply with Utah Code, protect the public, minimize the chance of the cooperative's power lines starting wildfires, and speed up the recovery from any wildfires that may occur. The current WFPP was reviewed and approved by MLEA's Board of Directors on June 24, 2026 and filed with the Commission on July 8, 2026.

Discussion

The WFPP includes the following steps for implementation:

1. Overview and Wildland Fire planning efforts for the service areas
2. Objectives of the Wildfire Mitigation Plan
3. Wildfire Risk Analysis
4. Wildfire Prevention Strategies and Protocols
5. Community Outreach and Education
6. Integration with Applicable Plans
7. Appendices of Supporting Documents and Mapping

The Division's review of the WFPP included a comparison of the current WFPP to the WFPP that was filed in 2023. The 2026 WFPP added or updated several components compared to the 2023 WFPP. Notably, MLEA developed a Wildfire Protection Plan Committee, which includes the following personnel: General Manager/CEO, Manager of Operations, Line Superintendent, Drone Operator, Engineering Coordinators, IT Manager, and a GIS Specialist.

The 2026 plan includes updates in fire risk modeling, utilizing the 2025 LANDFIRE database to predict fire spread/intensity. It also identifies priority areas for mitigation utilizing the High-Risk Wildland Urban Interface (WUI) properties map, which is officially cataloged and maintained through the Utah Wildfire Risk Assessment Portal (UWRAP). This dataset

specifically identifies structures susceptible to heightened wildfire risk, particularly in areas where human development touches fire-prone wildland. The 2026 plan highlights the increase in human-caused ignitions and the need for continuing public education and outreach for fire prevention. Like the 2023 plan, the 2026 iteration highlights areas with heightened wildfire risk and historic fires within the service territory, as well as maps demonstrating the vegetation spread/type and a discussion about high-risk vegetation types. Given its diverse service territory, MLEA has also demonstrated nuanced county-level collaboration with various fire departments, jurisdictional assistance agencies, and state and federal agencies.

The Division has reviewed the filing and determined that it contains a point-by-point discussion of the requirements outlined in Utah Code § 54-24-203(2); however, the plan did not include explicit approval from MLEA's Board of Directors, as required in Utah Code § 54-24-203(3)(c). The Division contacted the Operations Manager informally and received the meeting minutes from the June Board of Directors meeting, which confirmed the Board of Directors' approval of the plan. The Division has provided a portion of the meeting minutes confirming the approval as Exhibit 1.1. Based upon the review, the Division has concluded that MLEA's filing complies with Utah Code § 54-24-203(1-3).

Recommendations

The Division recognizes the effort required to compile multi-year WFPPs, track plan progress, and ultimately ensure effective mitigation efforts. The Division provides the following suggestions for MLEA to consider, which may aid in tracking plan progress and ensure effective mitigation. Aligned with the recommendations provided in the comments on the 2025 Annual Cost and Compliance Report¹, the Division recommends MLEA consider delineating planned mitigation activities for each year in the WFPP. By separating out planned activities by year, it may be helpful for the Division and the utility to track mitigation efforts more closely.

¹ *Moon Lake Electric Association, Inc.'s Wildland Fire Protection Plan Compliance Report*, Docket No. 26-030-01

Additionally, the Division recommends MLEA include projected yearly costs of planned program activities. Like delineating program activities, providing yearly forecasted costs may help MLEA track spending more effectively. Finally, the Division recommends that MLEA include the date that the plan was approved by its Board of Directions.

Conclusion

Based on its review, the Division recommends the Commission acknowledge that MLEA has complied with the requirements for Utah Code § 54-24-203. The Division also recommends that MLEA consider including the following items in future plans: (1) planned program activities for each individual year included in the WFPP; (2) yearly forecasted costs for each individual year in the WFPP; and (3) the date the plan was approved by the Board of Directors.

cc: Curtis Miles, Operation Manager for MLEA
Michele Beck, Office of Consumer Services