ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W. North Temple, Suite 330
Salt Lake City, Utah 84116

June 1, 2026

***VIA ELECTRONIC FILING***

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administration

**RE: Docket No. 26-035-26—PacifiCorp's 2025 Wildland Fire Cost and Compliance Report**

Pursuant to Utah Code § 54-24-201(4) and 54-24-202(2) and Administrative Code R746-315-3, PacifiCorp, d.b.a. Rocky Mountain Power ("the Company"), hereby submits its Wildland Fire Cost and Compliance Report for calendar year 2025 ("Report").

The Company respectfully requests that all formal correspondence regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
max.backlund@pacificorp.com

By Regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Max Backlund, Utah Regulatory Affairs Manager at max.backlund@pacificorp.com.

Sincerely,

Jana Saba
Director, Regulation and Regulatory Operations

Enclosure

Cc: Division of Public Utilities
Office of Consumer Services

## CERTIFICATE OF SERVICE

Docket No. 26-035-26

I hereby certify that on June 1, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

| | |
|---|---|
| Michele Beck | mbeck@utah.gov |
| | ocs@utah.gov |

**Division of Public Utilities**

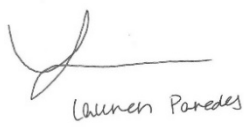
| | |
|---|---|
| | dpudatarequest@utah.gov |

**Assistant Attorney General**

| | |
|---|---|
| Patricia Schmid | pschmid@agutah.gov |
| Robert Moore | rmoore@agutah.gov |
| Patrick Grecu | pgrecu@agutah.gov |

**Rocky Mountain Power**

| | |
|---|---|
| Data Request Response Center | datarequest@pacificorp.com |
| Jana Saba | jana.saba@pacificorp.com |
| | utahdockets@pacificorp.com |
| Max Backlund | max.backlund@pacificorp.com |



Lauren Paredes
Coordinator, Regulatory Operations

# 2025 Rocky Mountain Power Wildfire Mitigation Plan

# Cost and Compliance Report

## June 1, 2026

# TABLE OF CONTENTS

**1. Introduction ..... 3**

**2. Wildfire Mitigation Activities in 2025 ..... 4**

2.1 Risk Modeling and Drivers ..... 4

2.2 Inspection and Correction ..... 5

2.3 Vegetation Management ..... 6

2.4 Environmental Program ..... 6

2.5 System Hardening ..... 7

2.6 Situational Awareness ..... 9

2.7 System Operations ..... 11

2.8 Field Operations and Work Practices ..... 11

2.9 Public Safety Power Shutoff ..... 12

2.10 Emergency Management and Response ..... 13

2.11 Public Safety Partner Coordination ..... 14

2.12 Community Outreach and External Collaboration ..... 14

2.13 Plan Monitoring and Implementation ..... 16

**3. Expenditures and Forecasts ..... 21**

3.1 2025 Spend Overview ..... 21

3.2 Grant Funding ..... 21

3.3 Cost Categorization ..... 21

3.4 Capital Spend Summary ..... 23

3.5 O&M Spend Summary ..... 24

**4. Changes to the Plan ..... 27**

**5. Cost Recovery ..... 28**

**Appendix A – Report Requirements ..... 29**

**Appendix B – Completed Projects ..... 31**

# LIST OF TABLES

Table 2-1: 2025 Open and Corrected Conditions Identified in the FHCA ..... 5

Table 2-2: 2025 Public Outreach Events ..... 15

Table 2-3: Summary of 2025 Wildfire Mitigation Activities by Mitigation Program ..... 17

Table 3-1: Categorization of Mitigation Programs – 2020 WMP to Current ..... 22
Table 3-2: Utah Wildfire Mitigation Plan Implementation Summary – Capital ($ Millions) .. 23
Table 3-3: Utah Wildfire Mitigation Plan Implementation Summary – O&M ($ Millions) ..... 25

# 1. INTRODUCTION

Consistent with Utah Code § 54-24-201(4), § 54-24-202(2), and R746-315-3, Rocky Mountain Power (the "company") submits this annual Cost and Compliance Report ("report"), which provides the following:

1. Details of the company's wildfire mitigation efforts undertaken in 2025 in compliance with the approved 2020 Utah Wildland Fire Protection Plan ("WMP")[1] as filed in Docket No. 20-035-28 ("2020 WMP Docket");
2. The actual capital investments and operations and maintenance (O&M) expenses incurred in calendar year 2025 relative to the WMP filed in the 2020 WMP Docket and an updated forecast of the capital investments and expenses for 2026; and
3. Changes, if any, incorporated into the WMP during the previous year and the reason for the changes in accordance with the Public Service Commission of Utah's ("Commission") October 13, 2020, order in the 2020 WMP Docket.

This report contains elements of the planned capital investments and O&M expenses relative to the approved 2020 WMP. However, in 2025 Rocky Mountain Power worked diligently to implement the wildfire mitigation measures set forth in its 2023–2025 WMP during the pendency of the 2024 General Rate Case, Docket No. 24-035-04 ("2024 GRC"). Although this report details compliance with the 2020 WMP, the report references the unapproved 2023–2025 WMP where needed to provide necessary context.

[1] The terms "wildland fire protection plan" and "wildfire mitigation plan" are synonymous.

# 2. Wildfire Mitigation Activities in 2025

This section documents the wildfire mitigation work Rocky Mountain Power performed in 2025, in compliance with its 2020 WMP.

## 2.1 Risk Modeling and Drivers

The 2020 WMP describes Rocky Mountain Power's plan to model risk to help guide wildfire mitigation efforts. In 2025, the company continued these efforts, as discussed below.

### Risk Modeling and Benefit-Cost Analysis

Reviewed and updated long-term risk modeling and benefit-cost approach – Throughout 2025, Rocky Mountain Power continued to update its risk assessment methodology. A detailed explanation of these changes will be available in Rocky Mountain Power's 2027–2029 WMP, which will be filed by October 1, 2026. This updated risk assessment methodology and benefit-cost analysis will help the company prioritize future projects by evaluating mitigation benefits relative to customer costs.

Benchmarking and lessons learned – In 2025, the company participated in joint utility workshops, conferences, and benchmarking discussions to evaluate industry practices for wildfire risk modeling and analysis. This included utility wildfire mitigation conferences, joint utility working groups for mitigation effectiveness and risk modeling, and direct discussions with peer utilities working on wildfire risk mitigation. Lessons learned from these sessions helped to inform risk model updates and new analyses to support wildfire mitigation program planning.

### Fire High Consequence Area

Updated fire high consequence area (FHCA) methodology – In 2025, Rocky Mountain Power began updating its FHCA methodology to align with current best practices and the most relevant and up-to-date data sources, including the Utah Department of Natural Resources Wildfire Hazard Potential index. The updated methodology identifies high-risk areas independent of asset locations, emphasizes fire likelihood and intensity alongside community impacts, and includes a thorough subject matter expert feedback and review process. Rocky Mountain Power has informed the Utah Division of Forestry, Fire and State Lands of this new methodology and has solicited feedback on new FHCA boundaries derived from this methodology. The updated FHCA methodology will be introduced in the 2027–2029 WMP.

## 2.2 Inspection and Correction

As described in the 2020 WMP, Rocky Mountain Power performs three types of standard asset inspections: visual assurance, detailed, and pole test and treat. The company supplements visual inspections using infrared imagery on transmission lines inside and interconnected with the FHCA. Inspections and corrections performed in 2025 are discussed below.

### Distribution and Transmission Facility Point Inspection and Correction

Continued planned inspection programs on transmission and distribution lines – In 2025, Rocky Mountain Power continued inspections in accordance with its general inspection policies and procedures for assets within the FHCA. Total inspection numbers for 2025 are listed in Table 2-3 at the end of this section.

Table 2-1 lists the number of corrected and open conditions for 2025, along with their corresponding condition priority classification.

**Table 2-1: 2025 Open and Corrected Conditions Identified in the FHCA**

| Energy Release Risk | Condition Priority | Planned Correction Time Frame | Open Conditions (as of EOD Dec. 31, 2025) | Corrected Conditions |
|---|---|---|---|---|
| Yes | I | Immediately | 0 | 1 |
| Yes | A | 60 days average | 21 | 486 |
| Yes | B | 12 months | 288 | 2,031 |
| No | A | 120 days average | 114 | 544 |
| No | B | Not specified | 3,266 | 2,030 |
| | | **Total** | **3,689** | **5,092** |

Imminent threat conditions (condition type I) that pose an energy release risk are prioritized and scheduled for correction as soon as locations can be safely accessed by line operations. Open conditions shown in Table 2-1 are not necessarily overdue, as the correction time frame might not have elapsed by year-end 2025.

### Transmission Infrared Inspection

Continued enhanced infrared inspections – Infrared inspections were performed on 52,251 structures in 2025 (approximately 4,427 line miles) to detect potential conditions or

"hot spots" that may not be identifiable through standard inspection programs. Infrared inspections are strategically scheduled during peak loading to increase the likelihood of identifying thermal anomalies that could indicate a potential issue.

## 2.3 Vegetation Management

The 2020 WMP describes the company's regular vegetation program and schedules, as well as its modified practices on assets located within the FHCA to help mitigate risk of ignition. In 2025, the company performed the following vegetation management work.

Continued planned vegetation management programs – In 2025, vegetation management activities included annual inspections of circuits within the FHCA, extended post-work vegetation clearances, and pole clearing at the base of identified poles.

Annual inspections were performed to identify and remove any vegetation that could pose a risk of fall-in or contact with an energized line. Extended clearances were conducted to reduce the risk that vegetation growth would exceed the minimum distance to the energized lines before the next scheduled inspection.

Pole clearing on subject poles (e.g., equipment poles) located in the FHCA involved removing all vegetation within a 10-foot radius, extending up to eight feet vertically, around each subject pole. Herbicide and/or a soil sterilant was then applied to prevent vegetation regrowth.

Refer to Table 2-3 for vegetation management work completed in the FHCA in 2025.

## 2.4 Environmental Program

### Wildlife Protection

Continued Avian Protection Plan work – Rocky Mountain Power continued implementing its Avian Protection Plan in Utah. The Avian Protection Plan is intended to reduce avian electrocution risks by reducing the likelihood of bird or animal contact with energized lines. The plan includes proactive actions such as nest management, substation protections, and line element protections or pole retrofits. Nest management activities include relocating nests or installing avian guards to prevent animal contact with lines. Pole retrofits are performed to reduce nesting or animal contact in areas where previous incidents have occurred.

Continued HawkWatch International partnership – Rocky Mountain Power partners with HawkWatch International to install or maintain nest boxes for cavity nesting birds that

could be impacted by removal of nest sites through vegetation management of dead or dying trees.

Table 2-3 summarizes the wildlife protection activities completed in 2025.

### Habitat and Fire Resiliency

Identified and supported partner habitat and fire resiliency projects – In 2025, Rocky Mountain Power partnered with Pheasants Forever on the Intermountain West Joint Venture's Forest Habitat program. The program identifies habitat improvement projects that can be implemented to support healthy, fire-resilient forests across large landscapes involving multiple public and private partners. The projects mitigate the wildfire risk both within Rocky Mountain Power's service territory and adjacent to the company's infrastructure by removing dead and dying trees, restoring vegetation to encourage fire resiliency, improving the water quality, and increasing the water volume to reduce the possibility and impact of a wildfire in the project areas.

In 2025, the company worked with these partners to plan and fund a collaborative project with the U.S. Forest Service in Fish Lake National Forest in Richfield, Utah. This project included vegetation removal and thinning and removal of homogeneous stands to reduce the risk of crown fires. The project area is adjacent to company facilities and encompasses 5,470 acres.

## 2.5 System Hardening

### Idle Line Program

Removed or mitigated idle lines – Idle lines that are mutually coupled to an energized line may pose an ignition risk. While not part of the 2020 WMP or 2023–2025 WMP, beginning in 2025, the company began removing idle lines in Utah that are not being used as an active backup to an energized line or part of a 10-year plan project. For idle lines that are not removed due to anticipated future use, Rocky Mountain Power contracted with a vendor to conduct power simulations to advise mitigation strategies for these lines. These studies demonstrated that reducing the length of idle transmission lines to 1-mile segments (or 0.5-mile segments where distribution underbuild is present) can effectively reduce ignition risk. Table 2-3 lists the number of idle lines removed or mitigated through line segmentation in 2025.

### Line Rebuild Program

Completed 2025 line rebuild projects – Rocky Mountain Power's line rebuild program involves overhead lines within or adjacent to the FHCA that are constructed with bare overhead conductor. These lines may be moved, removed, converted to underground, rebuilt, or retrofitted with more-resilient materials such as covered conductor or non-wooden poles. In 2025, the company rebuilt 24 miles of transmission lines and 110 miles of distribution lines.

Although the Commission did not approve Rocky Mountain Power's 2023–2025 WMP in its April 25, 2025, order, the company was actively implementing elements of the 2023–2025 plan prior to the Commission's order. Rocky Mountain Power has since pivoted to better align its activities with the approved 2020 WMP initiatives. This included re-evaluating investments made in select line rebuild projects and canceling those projects for which minimal progress or investments had been made. Given this ongoing scaling, spending in 2025 was higher than the levels outlined in the 2020 WMP due to projects and contracts already in effect in April 2025 prior to the Commission order. Rocky Mountain Power is committed to adhering to the Commission's order to comply with the 2020 WMP until a new WMP is approved.

### Advanced System Protection

Completed 2025 planned equipment upgrades – In 2025, the company continued replacing and upgrading electromechanical relays with microprocessor relays. Upgrading to microprocessor relays provides multiple wildfire mitigation benefits, including increased programmed function speed compared with electromechanical relays, which can reduce the length and magnitude of fault events. These upgrades also enable the use of customized settings to address environmental conditions. When replacing an electromechanical relay, the associated circuit breaker or other line equipment may also be replaced, as appropriate. In 2025, the company upgraded 21 distribution breakers and relays and installed 66 reclosers.

### Expulsion Fuse Replacements

Completed 2025 planned expulsion fuse replacements – In an effort to reduce the arcing that can result from an expulsion fuse operation, expulsion fuses are being replaced proactively within the FHCA. The expulsion fuse replacement program spans multiple years over many circuits across the company's service territory. In 2025, the company replaced 4,096 expulsion fuses.

### Fault Indicators

Completed 2025 planned fault indicator installations – Communicating fault circuit indicators (CFCIs) are being installed to reduce outage duration, including outages resulting from enhanced recloser or relay settings. CFCIs improve response times by enabling faster fault location. In 2025, the company completed 737 CFCI installations.

## 2.6 Situational Awareness

The 2020 WMP describes the company's approach to identifying conditions that affect wildfire ignition and spread. This includes the use of meteorologists, weather stations, high-definition cameras, and engagement with community partners.

### Meteorology Department

Continued weather forecasting – The company's experienced Meteorology Department is an essential group that gathers, translates, and interprets weather data specific to utility operations. This data enables the company to take meaningful action in advance of severe weather to reduce restoration times, plan for resourcing, and increase reliability. The department uses an internal operational Weather and Research Forecast model and a complementary historical dataset, currently spanning 33 years across the company's entire service territory. The model creates a comprehensive forecast of atmospheric, fire weather, and National Fire Danger Rating System parameters out to 126 hours (5 days). The forecast is overlaid on the electrical distribution and transmission network to determine asset-level weather-related impact and fire potential risk.

Continued wildfire modeling – In 2025, the Meteorology Department continued to model wildfire behavior using Technosylva's Wildfire Analyst Enterprise (WFA-E) platform, specifically the FireRisk and FireSim modules. The resulting data provides wildfire potential risk metrics such as fire size potential, live and dead vegetation moisture, and weather conditions, which are used to assess the fire potential across the service territory. These outputs inform daily district fire risk assessments.

Continued daily district fire risk assessments – The Meteorology Department produces a daily, weather-related, district-level system impacts forecast that guides operational decision-making, including activation of enhanced safety settings (ESS). When evaluating whether to raise the fire potential risk level, the Meteorology Department performs an additional review of fuels and fire weather forecasts and observations. In 2025, these forecasts supported the determination that the fire risk potential met the threshold for the PSPS event described in section 2.9.

### Weather Station Network

Expanded weather station network – Rocky Mountain Power uses a combination of public weather data and company-owned and operated weather stations to monitor conditions and inform system operations. By installing its own weather stations, the company can fill coverage gaps, control the calibration and maintenance to ensure high-quality data, and adjust the reporting frequency to support real-time risk assessment and dynamic modeling.

In 2025, the company installed 10 weather stations in Utah, bringing the total number of stations to 189, including 10 portable stations. As Rocky Mountain Power's weather station network expands, the company regularly evaluates the network for ways to increase situational awareness across Utah.

Completed annual weather station maintenance – Company-owned stations undergo annual maintenance to maintain optimal performance. In 2025, the company performed maintenance on all 169 of its pre-existing weather stations in Utah.

### Wildfire Cameras

Continued operation of wildfire cameras – Wildfire cameras support situational awareness by providing real-time visual monitoring. In 2024, the company uninstalled legacy wildfire cameras and installed five wildfire detection cameras equipped with advanced capabilities, including artificial intelligence smoke recognition, low-light and nighttime detection, and both fixed and rotational viewing to enhance visibility across the system. In 2025, the company continued operating and maintaining the five installed cameras. No additional wildfire cameras were installed in 2025.

In 2025, these cameras were actively used by the Wildfire Intelligence Center as part of daily situational awareness activities. Camera imagery supported localized event monitoring, validation of reported smoke, and ongoing assessment of wildfire conditions that may warrant public safety power shutoffs (PSPS) or other operational actions.

### Wildfire Intelligence Center

In 2025, the company completed development of the Wildfire Intelligence Center (WIC) to provide 24/7 hazard monitoring, with a focus on wildfire. The WIC is informed by industry best practices and uses advanced monitoring and intelligence capabilities to inform decision-making and coordination with fire authorities. The WIC is staffed by personnel who monitor live conditions, assess incident information using a defined threat matrix, and determine whether response thresholds have been met. The WIC provides situational

awareness to support early detection, timely resource deployment, rapid engagement and coordination with emergency responders and public safety partners, and improved customer notification.

## 2.7 System Operations

The 2020 WMP discusses the operation of protective settings for automatic reclosers and line testing after lock-out. In 2025, the company continued to implement these practices to help reduce wildfire ignition risk.

### Enhanced Safety Settings

Continued deploying enhanced safety settings – During periods of heightened wildfire risk, the company may enable enhanced safety settings (ESS), formerly referred to as elevated fire risk (EFR) settings. ESS are intended to reduce the arc energy released during a fault event and avoid fuse operation by using fast tripping while maintaining an acceptable level of service reliability. The settings may be enabled based on the daily district fire risk assessment performed by Meteorology. Protective relay devices such as circuit breakers, line reclosers, and fuse savers are examples of devices that can have ESS enabled. In 2025, the company conducted daily risk assessments to identify weather conditions favorable to wildfire ignition and spread, resulting in the implementation of ESS. In 2025, the company recorded 1,177 ESS outages throughout its Utah service territory.

## 2.8 Field Operations and Work Practices

The 2020 WMP outlines how the company may modify work practices during fire season, including the use of protective equipment and other wildfire mitigation and emergency resources. The company implemented these practices in 2025 as outlined below.

### Modified Work Practices

Continued field implementation of modified work practices – During the 2025 fire season, field personnel helped mitigate wildfire risk by adjusting work practices and equipment used. Personnel were equipped to extinguish small fires in the unlikely event an ignition occurred. Wildfire risk was further reduced through careful scheduling and execution of field work, guided by regular reviews of local fire conditions and weather forecasts. Restrictions in place during these conditions included hot work, time-of-day, driving restrictions, and worksite preparation as needed.

### Mobile Communication Devices

Procured additional communication equipment to aid in emergency response – In 2025, Rocky Mountain Power procured two Starlink satellite communication devices. The devices are strategically placed throughout the service territory and used during major events, such as wildfires, to improve communication capabilities to the control center, base camp, and emergency management. The enhanced communication capabilities support emergency restoration efforts, mitigating impacts to customers. Because these devices support multiple programs across the company, the ongoing operating fees have been incorporated into normal operational spend beginning in 2026.

### Equipment and Vehicle Purchases

Procured vehicles and equipment to aid in wildfire mitigation – In 2025, Rocky Mountain Power procured three flatbed fire trucks and three water tanks used for conducting field work in fire season. Other major costs incurred include covered conductor stripping equipment and end-of-cycle aged equipment replacement to help mitigate wildfire risk.

### Wildfire Training Material

Continued use of wildfire eBooks and training applications – In 2025, Rocky Mountain Power continued providing wildfire training materials, including eBooks and mobile applications, to internal employees. The goals of the training materials are to prepare and train crews before an event happens to reduce response time and aid in response effectiveness. Topics include wildfire protection, roles and responsibilities, and PSPS. The applications include interactive scenarios to inform and guide crew actions during wildfire events.

## 2.9 Public Safety Power Shutoff

### 2025 PSPS Experience

Continued PSPS readiness and response – On June 16, 2025, Rocky Mountain Power's Meteorology Department forecasted hot, dry, and windy conditions for June 21, 2025. The intersection of critically dry vegetation and an outage potential prompted Meteorology to identify a potential PSPS event for Cedar City, Enterprise Valley, Milford, Panguitch, Richfield, and Santaquin areas.

On June 17, 2025, PSPS coordination began through the Department Operations Center and the Emergency Coordination Center (ECC). Daily calls escalated to twice daily on June

19, 2025, with continuous coordination June 21, 2025, via an open conference line and three formal ECC briefings.

Communications to customers, communities, public safety partners, and key accounts were executed in accordance with the 2025 PSPS Execution Playbook. The Wildfire Intelligence Center continuously monitored the area for any potential wildfire activity using Rocky Mountain Power's wildfire cameras, integrated intelligence platforms, real-time incident reporting systems, evacuation and alerting tools, and a combination of internal and external wildfire intelligence sources to support situational awareness and threat detection.

Initial de-energization occurred at 05:47 MT June 21, 2025, with 3,114 customers impacted. PSPS conditions were canceled by 17:40 MT. Restoration activities commenced at 17:57 MT, and full restoration was completed at 21:50 MT, with minimal damage reported.

The event was supported by 85 transmission and distribution personnel and 15 ECC staff. A Community Resource Center was established in Cedar City, which operated during the PSPS event.

Rocky Mountain Power also continues ongoing coordination, training, and engagement with public safety partners to enhance PSPS readiness and response.

## 2.10 Emergency Management and Response

Continued wildfire response readiness – Rocky Mountain Power's emergency response framework is guided by the National Incident Management System (NIMS) and is designed to address wildfire events of any scale. This approach applies to incidents ranging from small wildfires managed by local fire suppression agencies to large-scale events requiring coordinated, multiagency responses.

In 2025, the company formed a wildfire and emergency response group composed of fire and emergency response managers who provide dedicated resource support to transmission and distribution operations during wildfire events. The response managers serve as agency representatives and act as the primary point of contact with incident management teams. They work closely with the WIC to validate emerging threats, issues, and concerns and are deploy to affected areas as needed, including during PSPS events to support company operations.

## 2.11 Public Safety Partner Coordination

Rocky Mountain Power notes in its 2020 WMP that it collaborates with emergency response professionals and local government. The company engages with these and other public safety partner in the following ways.

Completed events with public safety partners for emergency response – As part of its emergency preparedness efforts, the company takes an all-hazards approach to coordinating with public safety partners. The strategy includes regular outreach and coordination and may include workshops and tabletop exercises, as needed, that focus on wildfire mitigation and PSPS preparedness. Workshops, when performed, are localized, targeted discussions that aim to refine plans, streamline processes, and confirm capabilities. Tabletop exercises, when conducted, develop awareness of PSPS planning and procedures. The company did not conduct any PSPS-specific activities in 2025 but instead focused outreach efforts on all-hazards response and preparedness.

Continue using the Public Safety Portal – In 2025, Rocky Mountain Power continued training, coordinating, and communicating with public safety partners using the Public Safety Portal (formerly the Public Safety Partner Portal). The active portal is a secure, web-based portal where critical information is shared with public safety partners during a PSPS event. The portal is a map-centric application that hosts critical GIS files along with information regarding critical facilities and infrastructure.

## 2.12 Community Outreach and External Collaboration

In its 2020 WMP, the company describes its general outreach and external collaboration protocols. The company engages with its customers and internal and external stakeholders to provide updated information regarding outages, raise awareness, and facilitate critical communication for continuous improvement.

Continued community outreach about wildfire safety – In addition to engaging with public safety partners, Rocky Mountain Power supports public community engagement and outreach and strives to provide clear, actionable, and timely wildfire program information to customers, community stakeholders, and regulators. Over the past several years, the company has engaged customers and the general public on wildfire safety and preparedness through webinars, targeted paid advertising campaigns, informational videos featuring company subject matter experts, press engagements, distributed print materials, infographics, social media updates, and communication through bill messages, emails and website content, and other communication channels.

In spring 2025, Rocky Mountain Power hosted a webinar and four community events to engage with Utahns and increase community awareness of the company's wildfire mitigation program.

**Table 2-2: 2025 Public Outreach Events**

| Activity | Location | Date |
|---|---|---|
| Wildfire Mitigation Program Webinar | Virtual | April 30, 2025 |
| Wildfire Community Event | Emigration Canyon, UT | May 6, 2025 |
| Wildfire Community Event | Tooele, UT | May 7, 2025 |
| Wildfire Community Event | Cedar City, UT | May 8, 2025 |
| Wildfire Community Event | Huntsville, UT | June 5, 2025 |

Continued external collaboration – Rocky Mountain Power continues to actively engage in external collaborations to stay current on best practices and new technologies and research. The company is a member of the International Wildfire Risk Mitigation Consortium (IWRMC), an industry-sponsored collaborative designed to facilitate the sharing of wildfire risk mitigation techniques and program effectiveness. The company also plays leadership and support roles through other meetings, conferences, and organizations such as first American Meteorological Annual Meeting, the Western Region Mutual Assistance Conference, the Utility Wildfire, Weather, and Analytics Summit, the Institute of Electrical and Electronics Engineers Power and Energy Society General Meeting, and the Wildfire Insights and Support for Electric Utilities Informational Webinar.

Participated in climate risk initiative – In 2023, the company began participating in a three-year Electric Power Research Institute (EPRI) Climate Resilience and Adaption initiative (READi). By working with industry stakeholders and other utilities, a common framework was created to assess climate risk, address resilience, and evaluate investments. The initiative was completed in July 2025. EPRI published the Climate READi Compass,[2] the primary tool for navigating the framework and accessing the related resources and publications. These tools are available for company use and assessment.

[2] [2] Climate READi Compass: https://apps.epri.com/climate-readi-compass/en/. Accessed May 28, 2026.

## 2.13 Plan Monitoring and Implementation

Continued to develop the WMP and ensure adherence to the plan – The Wildfire Safety Program Delivery group ensures the project plans remain aligned with the WMP's objectives.

The company anticipates reducing its covered conductor and undergrounding projects until a cost-benefit analysis can help guide system strengthening efforts. The company is also re-evaluating the appropriate role of increased vegetation management efforts going forward.

Table 2-3 below details the company's compliance with Utah Code § 54-24-201(2) by mitigation program. Objectives for each program category reflect the broader goals of the programs based on the updated FHCA described in the 2023–2025 WMP.

## Table 2-3: Summary of 2025 Wildfire Mitigation Activities by Mitigation Program

| Mitigation Program | Objectives[3] | Completed Activities | Utah Code § 54-24-201(2) |
|---|---|---|---|
| Risk Modeling and Drivers | Implement advanced data analytics tools.<br><br>Continue to review and update the FHCA methodology and map as needed. | Reviewed and updated long-term risk modeling and benefit-cost approach.<br><br>Updated FHCA methodology. | (a) |
| Inspection and Correction | Continue standard inspection programs:<br>Structures<br>Distribution Visual Assurance: 42,877<br>Transmission Visual Assurance: 57,832<br>Distribution Detailed: 3,317<br>Transmission Detailed: 16,189<br>Distribution Pole Test & Treat: 6,313<br>Transmission Pole Test & Treat: 1,377 | Completed standard inspection programs:<br>Structures<br>Distribution Visual Assurance: 39,623<br>Transmission Visual Assurance: 60,423<br>Distribution Detailed: 3,010<br>Transmission Detailed: 17,167<br>Distribution Pole Test & Treat: 5,726<br>Transmission Pole Test & Treat: 1,375 | (b) |
| | Continue enhanced infrared inspections:<br>Transmission infrared: 4,427 miles | Completed enhanced infrared inspections:<br>Transmission infrared: 4,427 miles (52,251 structures) | |

[3] Objectives for each program category reflect the broader goals of the programs described in the 2023–2025 WMP.

| Mitigation Program | Objectives[3] | | Completed Activities | | Utah Code § 54-24-201(2) |
|---|---|---|---|---|---|
| Vegetation Management | Perform FHCA vegetation inspections and corrections: | | Completed FHCA vegetation inspections and corrections: | | (c) |
| | Distribution miles: | 1,172 | Distribution miles: | 1,172 | |
| | Transmission miles: | 890 | Transmission miles: | 890 | |
| | Poles cleared: | 12,615 | Poles cleared: | 12,970 | |
| | | | Trees removed: | 3,960 | |
| | | | Trees pruned: | 5,696 | |
| Environmental Program | Continue Avian Protection Plan work. | | Nests managed: | 60 | (d) |
| | | | Poles retrofitted: | 4,470 | |
| | Continue HawkWatch International partnership. | | Nest boxes installed or maintained: | 500 | |
| System Hardening | Remove or mitigate idle lines. | | Transmission lines removed: | 23.6 miles | (d) |
| | | | Distribution lines removed: | 22.0 miles | |
| | | | Transmission lines mitigated: | 0.7 miles | |
| | Complete line rebuild: | | Completed line rebuild: | | |
| | Transmission lines: | 20 miles | Transmission lines: | 23.8 miles | |
| | Distribution lines: | 80 miles | Distribution lines: | 109.8 miles | |
| | Complete device upgrades: | | Completed device upgrades: | | |
| | Distribution relays: | 18 | Distribution breakers and relays: | 21 | |
| | Transmission relays: | 0 | Transmission relays: | 0 | |
| | Recloser replacement: | 10 | Recloser installations: | 66 | |
| | Complete 2,000 expulsion fuse replacements. | | Completed 4,096 expulsion fuses replacements. | | |
| | Complete 991 CFCI replacements. | | Completed 737 CFCI replacements. | | |

| Mitigation Program | Objectives[3] | Completed Activities | Utah Code § 54-24-201(2) |
|---|---|---|---|
| Situational Awareness | Continue Meteorology Department weather forecasting. | Continued Meteorology Department weather forecasting and risk assessment. | (d) |
| | Continue wildfire modeling. | Continued use of WFA-E modeling to assess the fire risk across the service territory. | |
| | Continue daily district fire risk assessments. | Continued daily district fire risk assessments to inform ESS and PSPS decisions. | |
| | Continue monitoring service area for ongoing wildfire threats. | Completed 8 emergency de-energizations. | |
| | Install 10 weather stations. | Installed 10 weather stations. | |
| | Complete annual weather station maintenance on 169 existing stations and 10 portable stations. | Completed maintenance on 169 existing weather stations and 10 portable stations. | |
| System Operations | Continue deploying enhanced safety settings. | Continued deploying enhanced safety settings:<br>ESS deployment count: 501<br>ESS outages: 1,177 | (d) |
| Field Operations and Work Practices | Procure additional communication equipment. | Procured two Starlink satellite devices. | |
| | Procure vehicles and equipment to aid wildfire mitigation. | Procured three flatbed fire trucks and three water tanks. | |
| Public Safety Power Shutoff (PSPS) | Continue PSPS readiness. | Demonstrated PSPS readiness before, during, and after the July 21, 2025, PSPS event:<br>Total customers affected: 3,114 | (e), (f) |
| Emergency Management and Response | Continue wildfire response readiness. | Completed. The company's emergency response is guided by NIMS. | (f) |

| Mitigation Program | Objectives[3] | Completed Activities | Utah Code § 54-24-201(2) |
|---|---|---|---|
| Public Safety Partner Coordination | Coordinate with public safety partners in training and workshops as appropriate. | Conducted 13 outreach and training events with public safety partners, including wildfire topics. | (h) |
| Community Outreach | Continue community outreach about wildfire safety. | Conducted 1 webinar and 4 wildfire community events. | (h) |
| Industry Collaboration | Continue external collaboration through supporting industry conferences and meetings. | Participated in conferences, meetings, and events collaboratively with 8 organizations. | |

# 3. Expenditures and Forecasts

## 3.1 2025 Spend Overview

The wildfire mitigation programs costs reflected in the 2020 WMP were based on the original risk methodology, FHCA, and investments planned within those areas. In 2023, the company filed its 2023–2025 WMP, which incorporated the expanded FHCA. Throughout 2023, 2024, and a portion of 2025, the company actively implemented wildfire mitigation activities within the expanded FHCA. At the time of the Commission's order in the 2024 general rate case, Docket No. 24-035-04, many projects were in more advanced stages of development or nearing completion. The company completed a substantial number of these projects, while discontinuing certain early-stage projects in accordance with sound business practices. In addition, several multi-year data and software subscription costs were incurred during calendar year 2025. Many projects required changes to appropriated funding to cover increased labor, material, and service costs over planned costs. The higher costs recorded for 2025 in the tables below are primarily attributed to these major factors.

## 3.2 Grant Funding

Under the Department of Energy's 2021 Infrastructure Investment and Jobs Act, PacifiCorp was awarded funding through the Grid Resilience and Innovation Partnerships (GRIP) program. The award was made under Project REFORM, Topic 2, which includes Smart Grid grants, designed to increase the flexibility, efficiency, and reliability of the electric power system through the deployment of smart grid equipment and technologies. In 2025, the funding reimbursed parts of Rocky Mountain Power's situational awareness mitigation program in Utah, focused on improving real-time monitoring and operational decision-making to reduce wildfire risk and enhance system reliability during high-risk conditions through weather forecasting models and wildfire detection network with AI-enabled cameras.

## 3.3 Cost Categorization

Since filing the 2020 WMP, Rocky Mountain Power has re-categorized various costs to match current mitigation program cost categories. Table 3-1 lists the programs as defined in the 2020 WMP and the current nomenclature, grouped by capital and O&M. The category information is not intended to be a definition of terms.

### Table 3-1: Categorization of Mitigation Programs – 2020 WMP to Current

| Capital Mitigation Program – 2020 | Capital Mitigation Program – 2025 |
|---|---|
| Advanced Protection and Control | System Hardening |
| Environmental | Environmental |
| Inspect and Correct | Inspection and Correction |
| Operational Practices | Field Operations and Work Practices |
| Situational Awareness | Situational Awareness |
| System Hardening | System Hardening |
| (none) | Risk Modeling and Drivers |
| **O&M Mitigation Program – 2020** | **O&M Mitigation Program – 2025** |
| Vegetation Inspections, Mitigation, Pole Clearing – Distribution | Vegetation Management (Distribution) |
| Vegetation Inspections, Mitigation, Pole Clearing – Transmission | Vegetation Management (Transmission) |
| FHCA Inspections | Inspection and Correction |
| Condition Corrections – Distribution | Inspection and Correction (Distribution) |
| Condition Corrections – Transmission | Inspection and Correction (Transmission) |
| Weather Station Maintenance, Tool Development, Community Meetings, Advertising – Other | Situational Awareness/Field Operations and Work Practices/WMP Engagement Strategy |
| Fault Anticipator – Other | System Hardening |
| Environmental – Wildlife Protection Program, Habitat Enhancements, Other – Distribution | Environmental (Distribution) |
| Environmental – Wildlife Protection Program, Habitat Enhancements, Other – Transmission | Environmental (Transmission) |
| Patrolling Costs, Field Response (PSPS) – Other | Field Operations and Work Practices/PSPS Program |
| Alert Wildfire Cameras – Other | Situational Awareness |
| Wood Pole Wrap | System Hardening |
| (none) | Public Safety Partner Coordination |
| (none) | Industry Collaboration |
| (none) | Plan Monitoring and Implementation |
| (none) | Risk Modeling and Drivers |

## 3.4 Capital Spend Summary

In 2025, Rocky Mountain Power invested $249.6 million in capital expenditures to implement the wildfire mitigation programs described in this Report. These expenditures are detailed in Table 3-2 below and include both actual expenditures for 2025 and forecasted expenditures for 2026. The values presented are based on when the expenditures occur and differ from capital additions, also known as "rate base," which are based on when projects are placed into service. The forecasted 2026 values are based on the company's current plan and are under evaluation to align with the recent Commission guidance in the 2024 GRC order issued on April 25, 2025, while maintaining appropriate and safe levels of capital investment.

**Table 3-2: Utah Wildfire Mitigation Plan Implementation Summary – Capital ($ Millions)**

| Mitigation Program | 2025 | | | | 2026 |
|---|---|---|---|---|---|
| | Actual | 2020 WMP | Variance | Comments | Forecast |
| **Distribution** | | | | | |
| Risk Modeling and Drivers | $ 14.7 | $ 0.0 | $ 14.7 | Cost incurred for weather forecasting and analytics modeling. | $ 3.0 |
| Inspection and Correction | $ 8.3 | $ 1.5 | $ 6.8 | Cost incurred for correcting conditions and deficiencies found in the expanded FHCA. | $ 0.0 |
| Environmental | $ 0.4 | $ 0.2 | $ 0.2 | Cost incurred for retrofitting poles and managing nests to prevent avian and wildlife contacts. | $ 0.3 |
| System Hardening | $145.3 | $ 14.6 | $130.7 | Cost to implement system hardening initiatives within the expanded FHCA including line rebuild, relay replacements, fuse installation, and idle line removal. | $ 50.5 |
| System Hardening – *Covered Conductor Subtotal*[4] | $ 26.4 | $ 13.9 | $ 12.6 | Costs incurred for covered conductor line rebuild projects. | $ 1.0 |

[4] The covered conductor subtotal is the disaggregated system hardening cost as agreed to in the company's reply comments dated 10/16/2025 in Docket No. 25-035-38 – PacifiCorp's Wildland Fire Cost and Compliance Report. Covered conductor and undergrounding costs do not represent total system hardening costs.

| Mitigation Program | 2025 | | | | 2026 |
|---|---|---|---|---|---|
| | Actual | 2020 WMP | Variance | Comments | Forecast |
| System Hardening – *Underground Subtotal*[5] | $ 98.7 | $ 0.0 | $ 98.7 | Undergrounding costs were not forecasted in the 2020 WMP. Cost incurred for underground line rebuild projects. | $ 41.8 |
| Situational Awareness | $ 23.3 | $ 0.0 | $ 23.3 | Costs for software packages and weather station installations. | $ 4.2 |
| Field Operations and Work Practices | $ 0.6 | $ 0.0 | $ 0.6 | Cost incurred to purchase additional vehicles, equipment, and rapid response communications equipment to be used in remote areas. | $ 0.0 |
| **Total Distribution** | **$192.7** | **$ 16.4** | **$176.3** | | **$ 57.9** |
| **Transmission** | | | | | |
| System Hardening | $ 53.6 | $ 5.6 | $ 48.0 | Cost to implement system hardening initiatives including transmission line rebuild and relay replacements. | $ 17.7 |
| Inspection and Correction | $ 3.3 | $ 0.0 | $ 3.3 | Cost incurred for correcting conditions and deficiencies found in the expanded FHCA. | $ 0.0 |
| **Total Transmission** | **$ 56.9** | **$ 5.6** | **$ 51.3** | | **$ 17.7** |
| **Total Capital Costs** | **$249.6** | **$ 22.0** | **$227.6** | | **$ 75.6** |

## 3.5 O&M Spend Summary

In 2025, Rocky Mountain Power spent approximately $14.6 million in O&M activities for wildfire mitigation, as shown in Table 3-3 below. The table includes actual amounts spent by mitigation program and planned spend based on the 2020 WMP, with a description of the variance between the actual and planned values. It also includes the company's

[5] Undergrounding subtotal is the disaggregated system hardening cost provided as agreed to in the company's reply comments dated 10/16/2025 in Docket No. 25-035-38 – PacifiCorp's Wildland Fire Cost and Compliance Report. Covered conductor and undergrounding costs do not represent total system hardening costs.

revised end-of-year 2026 forecast, as of May 2026. Rocky Mountain Power is currently reviewing the 2026 O&M budgets in consideration of the 2024 GRC order.

**Table 3-3: Utah Wildfire Mitigation Plan Implementation Summary – O&M ($ Millions)**

| Mitigation Program | 2025 | | | | 2026 |
|---|---|---|---|---|---|
| | Actual | 2020 WMP[6] | Variance | Comments | Forecast |
| **Distribution** | | | | | |
| Risk Modeling and Drivers | $ 1.1 | $ 0.0 | $ 1.1 | Internal labor costs associated with wildfire risk modeling, FHCA map development, and software licenses for wildfire risk modeling not included in 2020 WMP. | $ 1.4 |
| Inspection and Correction | $ 2.5 | $ 2.0 | $ 0.5 | Cost incurred for correcting conditions and deficiencies found in the expanded FHCA. | $ 2.8 |
| Vegetation Management | $ 2.6 | $ 1.3 | $ 1.3 | Planned spend for 2025 was developed prior to the expansion of the FHCA. As a result, costs incurred for increased patrols and corrections, including significant increase in equipment poles cleared. | $ 2.3 |
| Environmental | $ 0.5 | $ 0.5 | $ 0.0 | Cost incurred for on-the-ground habitat work and nest site management. | $ 0.5 |
| System Hardening | $ 0.8 | $ 0.1 | $ 0.7 | Cost incurred for CFCI data and firmware and relay/recloser settings updates not included in the 2020 WMP. | $ 0.7 |
| Situational Awareness | $ 2.5 | $ 0.5 | $ 2.0 | Cost incurred for internal labor, HPCC data center fees, software licenses, camera network, and weather station maintenance and data plans. | $ 3.2 |
| Field Operations and Work Practices | $ 1.2 | $ 0.0 | $ 1.2 | 2020 WMP did not account for ESS and emergency de-energization-related costs. Cost incurred for patrols, rapid response/Starlink communications, pole wrap, and support vehicles. | $ 1.1 |
| PSPS Program | $ 0.4 | $ 0.0 | $ 0.4 | Costs incurred for June 21 PSPS event. | $ 0.0 |

[6] Plan values based on the 2020 WMP exclude the mitigation program "Patrolling Costs, Field Response (PSPS) – Other," as these costs are not anticipated.

| Mitigation Program | 2025 | | | | 2026 |
|---|---|---|---|---|---|
| | Actual | 2020 WMP[6] | Variance | Comments | Forecast |
| Public Safety Partner Coordination | $ 0.1 | $ 0.0 | $ 0.1 | Cost incurred for Public Safety Portal maintenance, tabletop exercises, and Community Resource Center staffing. | $ 0.1 |
| WMP Engagement Strategy | $ 0.3 | $ 0.0 | $ 0.3 | Cost incurred for Safety and Preparedness Engagement and Communication. | $ 0.4 |
| Industry Collaboration | $ 0.1 | $ 0.0 | $ 0.1 | Costs related to the EPRI Climate READi program, IWRMC membership, and conference and workshop sponsorship. | $ 0.1 |
| Plan Monitoring and Implementation | $ 0.7 | $ 0.0 | $ 0.7 | Incurred costs for the Wildfire Grant Study and Wildfire Program Delivery. | $ 0.7 |
| **Total Distribution** | **$ 12.8** | **$ 4.3** | **$ 8.5** | | **$ 13.4** |
| **Transmission** | | | | | |
| Inspection and Corrections | $ 0.7 | $ 0.1 | $ 0.6 | Cost incurred for correcting conditions and deficiencies found in the expanded FHCA. | $ 0.7 |
| Vegetation Management | $ 0.2 | $ 0.3 | $ -0.1 | Costs incurred for patrols and corrections. | $ 0.1 |
| Field Operations and Work Practices | $ 0.9 | $ 0.0 | $ 0.9 | Cost incurred for drone patrols and pole wrapping. | $ -0.3 |
| Environmental | $ 0.0 | $ 0.1 | $ -0.1 | Identified work was conducted on distribution, not transmission. | $ 0.0 |
| **Total Transmission** | **$ 1.8** | **$ 0.5** | **$ 1.3** | | **$ 0.5** |
| **Total O&M Costs** | **$ 14.6** | **$ 4.8** | **$ 9.8** | | **$ 14.0** |

# 4. Changes to the Plan

This section details significant updates to Rocky Mountain Power's wildfire mitigation program in 2025 and the reason for those changes.

### Systemwide Visual Assurance Inspections

In 2025, Rocky Mountain Power began conducting annual overhead visual assurance inspections across its entire service territory, rather than only within the FHCA. These systemwide inspections are performed under normal business operations and schedules. The company recognizes that wildfire ignition risk exists everywhere and believes this broader inspection approach reduces the likelihood of catastrophic wildfires caused by electrical equipment. Conducting annual inspections both inside and outside the FHCA promotes consistent treatment of transmission and distribution assets, regardless of voltage, and ensures uniform practices across all six states served. This change reduces confusion among field employees, improves system reliability and resiliency, and lowers the risk of public safety incidents through earlier identification and correction of issues. Additional benefits include improved right-of-way management, increased availability of contract resources for other work, and potential reductions in insurance premiums by decreasing overall business risk.

### Fire and Emergency Response Managers

In 2025, Rocky Mountain Power formed a wildfire and emergency response group composed of fire and emergency response managers (FERMs) who provide dedicated resource support to transmission and distribution operations during wildfire events. FERMs serve as agency representatives and act as the primary point of contact with incident management teams. They work closely with the Wildfire Intelligence Center to validate emerging threats, issues, and concerns, and are deployed to affected areas as needed, including during PSPS events to support company operations.

# 5. Cost Recovery

For purposes of cost recovery, the Utah Public Service Commission established a wildfire mitigation balancing account in the company's 2020 GRC, Docket No. 20-035-04, to track and defer the incremental revenue requirement for the capital investments and expenses to implement the approved wildland fire protection plan. The base level of costs was updated on April 25, 2025, to reflect the new base established in the 2024 GRC, Docket No. 24-035-04. The company presents the balance of the wildfire mitigation balancing account in the results of operations reports, most recently filed in Docket No. 26-035-09 on April 28, 2026 (page 8.11). The company is not requesting cost recovery at this time.

# Appendix A – Report Requirements

**Table A-1: Annual Report Requirements**

| Requirement | Report Section |
|---|---|
| *Commission Order issued in Docket No. 20-035-28 on 10/13/2020:*<br>*(2) We direct RMP to identify in the annual reports required by Utah Code Ann. § 54-24-201(4) any changes it has incorporated into its wildland fire-related practices during the previous year and the reasons for those changes.* | Section 4 – Changes to the Plan |
| *54-24-201(4) No later than June 1, 2021, and each year after 2021, a qualified utility shall submit to the commission a report detailing the qualified utility's compliance with the qualified utility's wildland fire protection plan.* | Section 2 – Wildfire Mitigation Activities in 2025<br>Section 3 – Expenditures and Forecasts<br>Section 4 – Changes to the Plan<br>Section 5 – Cost Recovery |
| *54-24-202(1) A qualified utility shall recover in rates all prudently incurred investments and expenditures, including the costs of capital, made to implement an approved wildland fire protection plan.* | Section 5 – Cost Recovery |
| *54-24-202(2) A qualified utility shall file an annual report to the commission identifying the actual capital investments and expenses made in the prior calendar year and a forecast of the capital investments and expenses for the present year to implement a wildland fire protection plan approved by the commission under Section 54-24-201.* | Section 3 – Expenditures and Forecasts |
| *R746-315-3 (1) No later than June 1, 2021, and each year after 2021, a qualified utility shall submit a cost and compliance report:*<br>*(i) detailing the qualified utility's compliance with the qualified utility's approved wildland fire protection plan;*<br>*(ii) identifying the actual capital investments and expenses made in the prior calendar year and a forecast of the capital investments and expenses for the present year to implement the wildland fire protection plan approved under Section R746-315-2;* | Section 2 – Wildfire Mitigation Activities in 2025<br>Section 3 – Expenditures and Forecasts<br>Section 4 – Changes to the Plan<br>Section 5 – Cost Recovery |

| Requirement | Report Section |
|---|---|
| *Docket No. 25-035-38 – PacifiCorp's Wildland Fire Cost and Compliance Report* | Section 3 – Expenditures and Forecasts |
| *Rocky Mountain Power's reply comments dated 10/16/2025: "The Company agrees with the Division's recommendation to disaggregate costs for certain types of work, including undergrounding and installing covered conductors."* | |

# Appendix B – Completed Projects

The table below summarizes the wildfire mitigation projects completed by the company in 2025 with costs exceeding $1 million. For each project, fuel/terrain risk scores are included, consistent with the criteria considered during the project selection process. The 2020 WMP did not identify specific planned projects or associated risk scores. Accordingly, the scores presented here are provided for informational purposes only and reflect the risk scoring methodology used for project selection and described in the 2023–2025 WMP.

These scores do not represent the company's updated risk calculation methodology. The revised methodology will be applied to new wildfire mitigation projects beginning in 2027, in alignment with the forthcoming 2027–2029 WMP.

**Table B-1: Projects Completed in 2025 with Costs Greater Than $1M and Associated Risk Scores**

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| FHCA - Rbld New Harmony 11 Line Rebuild | A wildfire in this area has the potential for greater consequences to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on New Harmony 11 poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A wildfire caused by equipment in this area would result in significant cost, legal risk, and exposure to the company. | Max:<br>Mean:<br>Median: | 0.65<br>0.31<br>0.32 |
| FHCA - Coleman 15 Distribution Line Rbld | A wildfire in this area has the potential for greater consequences to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on CLM15 or CMM13 poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A wildfire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.48<br>0.30<br>0.29 |
| FHCA - Brighton 12 Distribution Ln Rbld | A wildfire in this area has the potential for greater consequences to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation. A fault on Brighton 12 poses a significant wildfire risk as identified in the FHCA. | Max:<br>Mean:<br>Median: | 0.96<br>0.71<br>0.73 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| FHCA - Quarry 15 Distribution Line Rebld | A fire in this area has the potential for greater consequence to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on QRY15 poses a significant fire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.98<br>0.60<br>0.69 |
| FHCA - Quarry 12 Distribution Line Rbld | A wildfire in this area has the potential for greater consequences to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on QRY12 poses a significant fire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.85<br>0.46<br>0.55 |
| FHCA - Rebuild MTD11 | A fire in this area has the potential for greater consequence to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on Mountain Dell 11 poses a significant fire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.91<br>0.56<br>0.65 |
| FHCA - Rbld Olympus 13 | A fire in this area has the potential for greater consequence to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on Olympus 13 poses a significant fire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 1.00<br>0.44<br>0.40 |
| FHCA - Rebuild EDN11 | A wildfire in this area carries potentially severe consequences to the public and environment. Interruption of power would also negatively impact customers due to extended restoration times.<br>• Risk 1: A fault on Eden 11 poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A wildfire caused by equipment in this area could result in great financial and legal risk to the company. | Max:<br>Mean:<br>Median: | 0.79<br>0.39<br>0.35 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| FHCA - Rbld Summit Park 11 | A wildfire in this area has the potential for greater consequence to RMP customers due to extended restoration times and the impact it may have on customer properties and the surrounding vegetation.<br>• Risk 1: A fault on Summit Park 11 poses a significant wildfire ignition risk as identified in the FHCA.<br>• Risk 2: A wildfire caused by equipment in this area would present great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.96<br>0.46<br>0.41 |
| FHCA - Snyderville 16 Dist Line Rebld | The older the assets, the higher the risk of failures that pose a risk of igniting a fire. The sooner this distribution line is replaced and the fire risk minimized, the better.<br>Material Availability<br>• A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.64<br>0.23<br>0.19 |
| FHCA - Rebuild Columbia 11 | A wildfire in this area has the potential of greater consequence to RMP customers due to extended restoration times and the impact it may have on customer homes and the surrounding vegetation.<br>• Risk 1: A fault on CLB11 poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max:<br>Mean:<br>Median: | 0.75<br>0.31<br>0.20 |
| Columbia - Woodside 46kV Rpl w/1-Ph Dist | What are the key risk issues if this project is not completed timely?<br>Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: This transmission line has a threat of fire, and upon review of the installed assets, it was determined that this line needs to be replaced to mitigate the risk of a failure that might result in ignition of a fire.<br>Customer Impact:<br>A failure on this line will result in minimal customer minutes lost since the transmission in this area serves very few customers. If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.75<br>0.31<br>0.20 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score |
|---|---|---|
| FHCA: 2025 Fuse Replacement | • Risk 1: Expulsion fuses, especially in extreme weather conditions, may ignite dry, flammable vegetation, which could lead to a wildfire.<br>Customer Impact:<br>Existing expulsion fuses can contribute to power outages or more extended downtime during faults, disrupting communities and potentially endangering lives that depend on electricity for critical services. | Circuit: ENO12<br>Max: 0.58<br>Mean: 0.21<br>Median: 0.20<br><br>Circuit: VER11<br>Max: 0.61<br>Mean: 0.32<br>Median: 0.32<br><br>Circuit: VER12<br>Max: 0.49<br>Mean: 0.34<br>Median: 0.34<br><br>Circuit: VER13<br>Max: 0.52<br>Mean: 0.24<br>Median: 0.24<br><br>Circuit: VER14<br>Max: 0.46<br>Mean: 0.22<br>Median: 0.21<br><br>Circuit: VER15<br>Max: 0.48<br>Mean: 0.22<br>Median: 0.19 |
| FHCA - Westfield: Rpl DPU, Rpl TPU,Rmv HMI | A wildfire in this area has the potential for great consequences to RMP customers due to extended restoration times and the impact it may have on customers' homes, property, and the surrounding vegetation.<br>• Risk 1: A fault at Westfield Substation poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Max: 0.61<br>Mean: 0.24<br>Median: 0.17 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score |
|---|---|---|
| FHCA - Quichapa: Rpl DPUs w/ 751 | Risk 1: The current relays are at a higher risk of failure. If left unaddressed, these units could fail, resulting in outages at substations and necessitating prolonged repair periods.<br>Customer Impact:<br>If the existing faulty relays are not replaced, it could result in outages and safety concerns. | Max: 0.64<br>Mean: 0.32<br>Median: 0.34 |
| Quail Creek: Replace Non-HMI DPU Relay | What are the key risk issues if this project is not completed timely?<br>Probability and/or yearly duration that issue(s) exists:<br>• Existing relays are not EFR compatible. If not replaced, equipment failure or faults could result in wildfire ignition. | Circuit: QUA11<br>Max: 0.16<br>Mean: 0.16<br>Median: 0.16<br>Circuit: QUA12<br>Max: 0.60<br>Mean: 0.24<br>Median: 0.18 |
| FHCA - Brighton: Rpl DPUs w/751 | A wildfire in this area has the potential for great consequences to RMP customers due to extended restoration times and the impact it may have on customers' homes, property, and the surrounding vegetation.<br>• Risk 1: A fault at Brighton Substation poses a significant wildfire risk as identified in the FHCA.<br>• Risk 2: A fire caused by equipment in this area would pose great legal risk to the company. | Circuit: BRI11<br>Max: 0.76<br>Mean: 0.61<br>Median: 0.61<br>Circuit: BRI12<br>Max: 0.96<br>Mean: 0.71<br>Median: 0.73<br>Circuit: BRI21<br>Max: 0.64<br>Mean: 0.52<br>Median: 0.60 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score |
|---|---|---|
| Magna: HMI DPU & TPU relay replacement | Risk 1: The current relays lack EFR functionality. If the issue is not addressed, a higher potential of wildfire ignition will exist, resulting in possible damage to the public, property and equipment.<br>Customer Impact:<br>If the existing, limited breakers and relays are not replaced, a fault could result in a wildfire with potential for property damage and safety risks. | Circuit: MAG11<br>Max: 0.41<br>Mean: 0.16<br>Median: 0.14<br><br>Circuit: MAG12<br>Max: 0.29<br>Mean: 0.19<br>Median: 0.18<br><br>Circuit: MAG13<br>Max: 0.38<br>Mean: 0.14<br>Median: 0.13<br><br>Circuit: MAG14<br>Max: 0.32<br>Mean: 0.24<br>Median: 0.29<br><br>Circuit: MAG15<br>Max: 0.44<br>Mean: 0.19<br>Median: 0.14<br><br>Circuit: MAG16<br>Max: 0.41<br>Mean: 0.24<br>Median: 0.23 |
| FHCA - Sigurd-West Cedar 230kV Rebuild | Risk 1: elevated risk and consequences associated with wildfire within the FHCA. Reconstruction of this transmission lines will mitigate wildfire risk and increase protection of its customers and the environment.<br>Customer Impact:<br>If a failure results in a wildfire ignition, there is a greater risk of property damage to both company and customer properties since the transmission lines are within the FHCA. | Max: 0.67<br>Mean: 0.11<br>Median: 0.00 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| FHCA - Parowan-Brian Head 69kV Rebuild | All transmission and distribution lines within the FHCA were reviewed and analyzed to assess wildfire ignition risk. "Parowan-Brian Head 69kV" was determined to be a significant risk. This project is part of the "Utah Wildfire Mitigation Plan" to reduce risk on the transmission and distribution systems improve reliability of services, protection of assets, customers and the environment.<br>• Risk 1: This power line posed a threat of wildfire ignition, and upon review of the installed assets, it was determined that this line should be rebuilt/upgraded.<br>Customer Impact:<br>If a failure were to result in a wildfire ignition, risk of damage/injury to the public is probable, and substantial damage to the environment, the company and its customers-owned property would result. | Max:<br>Mean:<br>Median: | 0.98<br>0.23<br>0.00 |
| Silver Creek-Kamas 46 kV Rbld for Wildfr | • Risk 1: Condition of the existing facilities pose a risk of failure and possible wildfire ignition. The sooner this line is replaced and the fire risk minimized, the better.<br>• Risk 2: A failure on this line will not directly result in customer minutes lost since the transmission in this area is looped. If a failure results in a wildfire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.55<br>0.30<br>0.31 |
| N Bench-Northeast 46kV Rbld for Wildfire | Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: The older the assets, the higher the risk of failures that pose a risk of igniting a fire. The sooner this line is replaced, and the fire risk minimized, the better.<br>Customer Impact:<br>A failure on this line will not directly result in customer minutes lost since the transmission in this area is looped. If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.42<br>0.21<br>0.12 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| Capitol-N Bench 138kV Rbld for Wildfire | All transmission and distribution lines within the FHCA were reviewed and analyzed to assess wildfire ignition risk. "Capitol to North Bench 46kV" was determined to be a significant risk. This project is part of the "Utah Wildfire Mitigation Plan" to reduce risk on the transmission and distribution systems improve reliability of services, protection of assets, customers and the environment.<br>• Risk 1: This power line posed a threat of wildfire ignition, and upon review of the installed assets, it was determined that this line should be rebuilt/upgraded.<br>Customer Impact:<br>If a failure were to result in a wildfire ignition, risk of damage/injury to the public is probable, and substantial damage to the environment, the company and its customers-owned property would result. | Max:<br>Mean:<br>Median: | 0.51<br>0.16<br>0.12 |
| El Monte-Eden 46kV Rebuild for Wildfire | Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: The older the assets, the higher the risk of failures that pose a risk of igniting a fire. The sooner this transmission line is replaced, and the fire risk minimized, the better.<br>• Risk 2: Customer Impact - If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since part of the transmission line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.83<br>0.58<br>0.75 |
| Cottonwd-Snyderville 138kV Rbld-Wildfire | Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: This transmission line has a threat of fire, and upon review of the installed assets, it was determined that this line needs replacement due to age to mitigate the risk of a failure that might result in ignition of a fire.<br>Customer Impact:<br>A failure on this line will result in minimal customer minutes lost since the transmission in this area serves very few customers. If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.94<br>0.42<br>0.37 |

| Project Name | Purpose and Necessity – Risk Analysis | Fuel/Terrain Risk Score | |
|---|---|---|---|
| Judge - Midway 46kV Rebuild for Wildfire | Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: The older the assets, the higher the risk of failures that pose a risk of igniting a fire. The sooner this line is replaced, and the fire risk minimized, the better.<br>• Rick 2: This line if currently constructed at 46 kV. Additional phase spacing will reduce the risk of "blow-in" related faults.<br>Customer Impact:<br>If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.83<br>0.40<br>0.47 |
| Park City - Judge 46kV Rbld for Wildfire | This transmission line is located inside the FHCA and, upon review of the installed assets, it was determined that this line needs replacement due to age to mitigate the risk of a failure that will increase the risk of wildfire.<br>It was additionally determined that the 3-phase distribution needs to be replaced and installed underground.<br>Probability and/or yearly duration that issue(s) exists:<br>• Risk 1: The older the assets, the higher the risk of failures that pose a risk of igniting a fire. The sooner this line is replaced, and the fire risk minimized, the better.<br>Customer Impact:<br>If a failure results in a fire ignition, there is a greater risk of property damage to both the company and customers since this line is inside the FHCA. | Max:<br>Mean:<br>Median: | 0.59<br>0.41<br>0.48 |