

September 16, 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 Wildland Fire Cost and Compliance Report**
Rocky Mountain Power’s Reply Comments

Per the June 10, 2026, Amended Notice of Filing and Comment Period in Docket No. 26-035-26, PacifiCorp, d.b.a. Rocky Mountain Power (“Company”), submits these reply comments. On August 31 and September 1, 2026, the Division of Public Utilities (“Division”) and Office of Consumer Services (“Office”) filed comments on the Company’s Wildland Fire Cost and Compliance Report (“Report”). Both the Division’s comments and the Office’s comments recommend that the Public Service Commission of Utah (“Commission”) acknowledge the Report, with recommendations.

Summary of the Division’s Comments

The Division’s comments recommend acknowledgement of the Report, with recommendations for additional reporting requirements.¹ The recommendations include a GIS map showing the completed line rebuild work for each year; a list of all Investment Appraisal documents (“IADs”) and Project Change Notices (“PCNs”) for all line rebuild projects; mean, median, and maximum risk scores for completed and planned projects; and a standardized data table format similar to DPU Exhibit 1.3.²

The Division states that “the Company did not provide the Division with sufficient evidence—such as a risk-spend analysis or cost-benefit analysis—to demonstrate that it balanced risk mitigation with cost control when approving projects during the year.”³ The Division also expresses concern that “it is not clear that the Company agrees with the view [that there must be some relationship between the budget and the Company’s administration of the plan] or has processes adequate to contain spending.”⁴

¹ *Rocky Mountain Power’s Wildland Fire Cost and Compliance Report for Calendar Year 2025*, Docket No. 26-035-26, Confidential Comments from the Division of Public Utilities, at 1 (October 31, 2026). (“Division’s Comments”).

² *Id.*

³ *Id.*, at 12.

⁴ *Id.*

Response to the Division's Comments

The Company appreciates the Division's review of the Report and its recommendations regarding additional reporting and transparency. The Company is generally supportive of providing supplemental information where doing so enhances stakeholders' understanding of wildfire mitigation investments and program execution. The Company's response to each recommendation is provided below.

GIS Maps

With respect to the Division's recommendation to provide GIS maps showing completed line rebuild work, the Company agrees to provide GIS map files as a confidential attachment to future annual Cost and Compliance ("CCR") filings. To facilitate this reporting, the Company will need to ensure that GIS deliverables are incorporated into the design package requirements for applicable line rebuild projects. While this will result in some incremental cost associated with engineering and design services, the Company understands that this GIS mapping can provide useful visual context regarding the location and extent of completed line rebuild work.

Investment Appraisal and Project Change Documents

Regarding the recommendation to provide IADs and PCNs associated with line rebuild projects, the Company agrees to provide each IAD and the most recent PCN, for applicable line rebuild projects completed or active during the reporting year that are over \$1 million as a confidential attachment to the annual CCR. The Company believes these documents will provide additional visibility into project justification, scope, and significant changes occurring during project execution while appropriately balancing reporting burden and information relevance.

Risk Scores

The Company can also provide the mean, median, and maximum risk scores associated with line rebuild projects in the 2026 reporting year. However, as discussed in the 2025 CCR, these scores are presented only as illustrative examples of the risk scoring methodology reflected in the Company's 2023 Wildfire Mitigation Plan ("WMP"), which was not approved. The Company does not use these non-monetized risk scores for planning, prioritization, or investment decision-making and does not anticipate using them in the future. The Company's current wildfire risk assessment framework incorporates updated risk assessment methodologies and associated Benefit-Cost Ratios ("BCRs"), which provide a more comprehensive and balanced evaluation of wildfire mitigation benefits relative to cost. Because BCRs are published for line rebuild projects in the WMP and have replaced the prior risk scoring approach, the Company believes that continued reporting of legacy risk scores beyond the 2026 CCR would have no analytical value and would create confusion regarding the Company's current decision-making framework. Accordingly, the Company proposes to provide these metrics in the 2026 CCR for informational purposes only and thereafter rely on the currently adopted risk assessment and BCR methodologies and associated BCRs as published in the WMP.

Standardized Data Table

Finally, the Company can provide future CCR data metrics in a standardized spreadsheet format consistent with the Division's recommendation. The Company agrees that a standardized format may improve transparency and facilitate year-over-year comparisons and stakeholder review. The Company will work to incorporate the requested data elements into future CCR submissions to the extent practicable and consistent with the evolution of the Company's wildfire mitigation practices.

Cost Containment Measures

The Company recognizes the Division's interest in a more explicit demonstration of how wildfire risk reduction benefits are considered in relation to project costs and budgetary constraints. Wildfire mitigation investments are subject to established internal planning, review, and approval processes that evaluate proposed projects based on understood wildfire risk, available alternatives, estimated costs, and overall project benefits as demonstrated in the provided IADs. As part of these processes, mitigation alternatives and their associated costs are considered, and projects are reviewed through multiple levels of management and governance committees before approval.

The Company acknowledges that the Division, Commission and other parties have expressed a desire for a more transparent demonstration of the relationship between mitigation benefits and project costs. In response, the Company developed the updated monetized risk assessment methodology described in its 2027-2029 WMP. This methodology quantifies wildfire risk reduction benefits and calculates BCRs for mitigation investments. These BCRs provide a direct comparison of expected benefits and project costs and serve the same fundamental purpose as a cost-benefit analysis by demonstrating whether the benefits of a proposed mitigation measure outweigh its costs.

However, it is important to note that this monetized methodology was not available during the planning and approval of projects undertaken in calendar year 2025, nor during the 2020 WMP planning period. Accordingly, projects completed during the reporting year could not have been evaluated using the BCR framework described in the Company's most recent filed WMP.

While the Company did not have a formal monetized cost-benefit methodology in place during the reporting period, spending decisions were nevertheless subject to budgetary review, evaluation of alternatives, cost scrutiny, management oversight, and established governance controls. Going forward, the updated risk assessment methodology and associated BCRs will provide stakeholders with a clearer and more transparent means of evaluating the cost-effectiveness of wildfire mitigation investments.

Summary of the Office's Comments

The Office's comments recommend acknowledgement of the Report, with recommendations.⁵ The Office expresses concern with regards to the level of spending, the cost-risk balance, the transition to the proposed new cost-benefit model in the 2027 Wildfire Mitigation Plan, and the amount of time available for the Office to receive and analyze adequate data from the Company.⁶ The Office also notes that the amount of annual capital spending does not match the ignition risk of 0.2 percent, as stated in the Office's comments.⁷ The Office recommends extending review timelines by 90 days and requiring more detailed information in initial filings.⁸ The Office's comments also recommend that the Company explain "why the risk scores have changed and, as RMP transition[s] to the new risk assessment methodology and benefit-cost analysis, how will the legacy risk scoring information be maintained to ensure project auditing and regulatory accountability."⁹

Response to the Office's Comments

The Company acknowledges the Office's comments regarding spending levels, the relationship between risk reduction and project costs, the transition to the updated risk assessment methodology presented in the 2027-2029 WMP, and the level of information available to support stakeholder review.

Risk Assessment Methodology

The Company notes that the updated risk assessment methodology was developed in direct response to criticisms that the Company's prior risk assessment framework did not sufficiently evaluate the cost effectiveness of capital-intensive wildfire mitigation investments. Specifically, stakeholders and the Commission expressed a desire for a methodology that more clearly demonstrated the relationship between mitigation costs and expected benefits. In response, the Company developed a monetized risk assessment methodology that quantifies wildfire risk reduction benefits and calculates BCRs for proposed line rebuild mitigation investments. This framework provides the cost-benefit analysis that stakeholders have previously requested and that the Commission has directed the Company to develop.

Because the updated methodology relies on a different analytical framework than the legacy non-monetized risk scoring approach, direct comparisons between the two methodologies are limited in value. The legacy risk scoring methodology was developed under the Company's earlier planning framework and was subsequently determined by stakeholders and the Commission to be insufficient for evaluating the cost effectiveness of mitigation investments. The Company therefore transitioned to the monetized methodology specifically to address those concerns.

⁵ *Rocky Mountain Power's Wildland Fire Cost and Compliance Report for Calendar Year 2025*, Docket No. 26-035-26, Comments from the Office of Consumer Services, at 9 (September 1, 2026). ("Office's Comments").

⁶ *Id.*, at 8-9.

⁷ *Id.* at 5.

⁸ *Id.* at 7-9.

⁹ *Id.*, at 9.

Accordingly, the Company does not intend to maintain the legacy risk scoring methodology as an ongoing planning, prioritization, or reporting tool. The legacy scores will no longer be relevant to investment decision-making, project prioritization, or evaluation of mitigation effectiveness. Future project selection and evaluation will be based on the updated methodology and associated BCRs, which provide a more transparent and meaningful measure of the relationship between mitigation benefits and costs. The Company recognizes the Office's interest in maintaining regulatory accountability. However, the Company does not believe continued reporting of legacy risk scores would provide meaningful insight into project selection decisions made under the current methodology and would instead create confusion by presenting metrics derived from a framework that is no longer used.

Utility-Caused Ignitions

The Office used information provided in data request 2.1 to show that annual system strengthening dollars do not match the ignition risk profiles based on past utility caused ignitions. As stated in the Company's response to OCS Data Request 2.1, Rocky Mountain Power objected to the request because the Company does not track all utility-caused or non-utility-caused ignitions and does not maintain a comprehensive record of every ignition occurring within its service territory. The data provided represented only those ignitions recorded by the Company and therefore should not be interpreted as a complete record of all utility-caused ignitions within the FHCA or non-FHCA areas.

The Company's objective is not simply to reduce the number of ignitions, but to reduce overall wildfire risk by lowering both the likelihood of an ignition and the potential consequences should one occur. FHCAs are identified because a single ignition in these areas can result in catastrophic impacts, including loss of life, destruction of property, economic losses, and significant community disruption. Accordingly, the value of wildfire mitigation investments should not be measured solely by changes in ignition counts, but also by their ability to prevent the rare, high-consequential wildfire events that can impose high economic loss in the affected communities.

Reporting Requirements and Timeframes

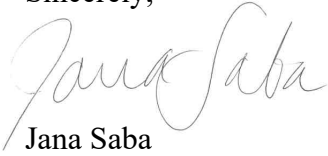
The Company appreciates the Office's recommendations regarding filing content and review timelines. The Company anticipates that, once the proceeding for approval of the 2027-2029 WMP concludes, the annual CCR filings will need to be revised and plans to work with the Division, Office, and other interested parties to determine what additional information should be provided.

The Office also notes that the current timeframes established in the Commission's administrative rules are not sufficient for review. As discussed by the Office, the Division has requested additional time in the past several CCRs and suggests that the Commission consider changing the rule. Administrative Rule R746-315-3 provides for a 90-day timeframe for processing annual CCRs but specifies that this timeframe may be revised if "the Commission determines that another process or additional time is warranted and is in the public interest." Therefore, the Company believes changes to the rule are not necessary at this time as the Commission has the ability to order additional time, as warranted.

Conclusion

The Company appreciates this opportunity to provide reply comments to the initial comments filed on August 31 and September 1, 2026, and respectfully requests that the Commission acknowledge the Report as meeting the relevant reporting requirements.

Sincerely,

A handwritten signature in cursive script, reading "Jana Saba". The signature is written in a light gray or blue ink.

Jana Saba

Director, Regulatory Affairs and Operations

CERTIFICATE OF SERVICE

Docket No. 26-035-26

I hereby certify that on September 16, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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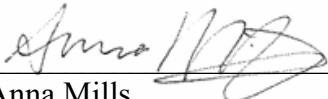
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