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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Jeremy Hirschi, Utility Technical Consultant
Savannah Torman, Utility Analyst

Date: September 8, 2026

Re: **Docket No. 26-035-35**, Rocky Mountain Power's 2027-2029 Utah Wildfire Mitigation Plan.

Recommendation: Order Scheduling Conference

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) set a Scheduling Conference in Rocky Mountain Power's (RMP or Company) 2027-2029 Utah Wildfire Mitigation Plan (WMP) as outlined in RMP's "Motion for Order Finding Additional Time is Warranted" filed in conjunction with its WMP. Also, the Division recommends that the Commission contract an Independent Evaluator (IE) to evaluate the scope of RMP's WMP to appropriately balance the costs of implementing the plan with the risk of potential wildland fire. The IE could provide perspective and help to achieve optimal program benefits while protecting Utah ratepayers.

Issue

Pursuant to Utah Code §54-24-201(3), on August 6, 2026, RMP filed its 2027-2029 Wildfire Mitigation Plan. On the same date, the Commission issued an Action Request directing the Division to review the Plan for compliance and make recommendations with a due date of September 8, 2026. Also on August 6, 2026, RMP filed a Motion for Order Finding



Additional Time is Warranted Pursuant to R746-315-2(2) and for Expedited Treatment of this Motion. This memorandum is the Division's comments on RMP's WMP.

Background

Utah Code §54-24-201 requires a qualified utility to prepare and file a wildland fire protection plan on June 1, 2020, and on or before October 1 of every third year after 2020. The plan should contain a description of the areas with heightened risk of wildland fire, the procedures, standards, and time frames for inspecting and operating the infrastructure, performing vegetation management, and the procedure for de-energizing power lines and disabling reclosers to mitigate wildland fire. The plan should also contain descriptions of the upgrades to facilities and preventative programs to reduce the risk of wildland fire, procedures to restore power in case of wildland fire, community outreach and public awareness efforts, and the costs for implementing the plan.

Discussion

The Company has complied with Utah Code §54-24-201(3) by submitting its WMP before October 1, 2026. The Company has additionally complied with the various aspects of the plan as described in Utah Code §54-24-201(2). Appendix A¹ provides the various locations in the Plan where each requirement is fulfilled. The WMP outlines the mitigation efforts planned for 2027-2029 and is divided into 14 sections and various subsections. The Plan estimates an investment of approximately \$288.5 million, or \$231 million of Capital Investment (CAPEX) costs and \$57.5 million of Operation and Maintenance (O&M) costs over the next three years.² System Strengthening and Resilience costs (\$223.2 million) account for approximately 77.4% of the total \$288.5 million, with 81 miles of overhead distribution lines and 108 miles of underground distribution lines planned to be rebuilt.³ Twelve miles of transmission lines are also planned to be rebuilt.⁴

The Company provided additional details in this WMP that were not included in previous versions, such as an updated risk modeling technique, Benefit-Cost Analysis (BCR) of its

¹ Report at 91.

² Report at 89, 90.

³ Report at 87.

⁴ *Id.*

proposed projects, and an updated heightened fire risk area (HFRA) replacing the former Fire High Consequence Area in Utah (FHCA). These updates were provided as a result of the Company's updated long-term risk model, Planning Model Version 2 (PMV2). The Company has identified the following benefits: (1) risk evaluated at the circuit segment level; (2) monetized risk expressed in U.S. dollars; (3) estimates BCR of system strengthening measures; and (4) a more structured project portfolio of mitigation actions. The updated risk modeling is calculated using risk-monetization that incorporates the cost of potential wildfire, implementing Emergency Safety Settings (ESS) or Public Safety Power Shutoffs (PSPS), as well as other inputs. Table 2-1 provides the costs the Company uses to calculate its risk-monetization.⁵ The newly included BCR is calculated per circuit segment, where risk-monetization costs are then weighed against the cost of various mitigation activities, such as enhanced vegetation management or line rebuilding. The BCR then provides a quantifiable cost-effectiveness score for potential mitigation activities.

The updated HFRA was also developed to determine wildfire risk across the entire service territory, independent of asset location. RMP states that this updated modeling technique increases transparency and accuracy by projecting real-world wildfire risk areas based on environmental data. The Company can utilize the updated HFRA modeling to better understand which of its assets require additional inspections or vegetation management.⁶ The Company explains that this approach better delineates the cost-effectiveness of capital investments in the system.⁷

Pursuant to Utah Code §54-24-201(3)(c) the Division recommends that the Commission consider using an outside expert or Independent Evaluator (IE) who may be better able to determine to what extent certain elements of RMP's WMP are necessary to mitigate wildland fires, while providing the added benefit of assuring Utah ratepayers that the inputs and actual cost outputs are reasonable and optimal in scope. This is especially important given the added liability protections that attach to RMP's plan under Utah Code §54-24-303(6).

⁵ Report at 17.

⁶ Report at 20, Figure 2-5.

⁷ Report at 19.

The Division also recommends that the Commission approve RMP's Motion for additional time in this proceeding, given the various changes made in this iteration of the WMP and the complexity of those changes. In its discussion related to the IE's report from 2025, RMP addresses the aggregate costs provided for CAPEX & O&M by stating: "[RMP] does not publicly disclose detailed project-level line-item cost estimates...and will provide additional detail during discovery and other regulatory review processes as appropriate."⁸ Extra time will allow the Division to gather additional information and conduct a more thorough review. It also gives the Commission the opportunity to hold a technical conference if desired. Given the filing's scope, the Division considers this extension necessary to properly evaluate the prudence of the provided materials.

Conclusion

The Division recommends that the Commission set a Scheduling Conference. The Division also recommends that the Commission contract an IE to thoroughly evaluate the WMP.

cc: Jana Saba, Rocky Mountain Power
Michele Beck, Office of Consumer Services

⁸ Report at 94.