



UTAH

**Governor
Spencer J. Cox**

**Lieutenant Governor
Deidre M. Henderson**

Division of
Public Utilities

Director,
Chris Parker

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

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McKenzie Cantlon, Utility Analyst

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Date: October 27, 2026

Re: **Docket No. 26-066-06**, Dixie Power's Wildland Fire Protection Plan.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Dixie Power's Wildland Fire Protection Plan (WFPP or Plan) as complying with Utah Code § 54-24-203(1)-(3). The Division also provides the following recommendations for Dixie Power to consider when compiling its future Wildland Fire Protection Plans: (1) the utility may want to add a section that specifically outlines planned mitigation efforts for each year of the plan; (2) the utility may want to include forecasted expenditures for each year of the plan; and (3) the utility should document and report the plan's date of approval by its governing body in its filing with the Commission.

Issue

On September 29, 2026, Dixie Power filed its WFPP. On the same date, the Commission issued an Action Request to the Division asking the Division to review the filing for compliance and make recommendations, with a due date of October 29, 2026. This memorandum is the Division's response to the Action Request.

Background

Dixie Power is a member-owned non-profit cooperative that provides power to portions of Washington, Iron, and Millard counties, and the northwest corner of Arizona. Utah Code § 54-24-203(3) requires an electric cooperative to submit its WFPP to its governing authority on or before October 1 every third year after calendar year 2020. The WFPP was submitted for review by Dixie Power's Board of Directors on September 14, 2026, and was filed with the Commission on September 29, 2026.

Discussion

The Company has outlined its WFPP for wildfire prevention, and the Division has reviewed the filing and determined that it contains a point-by-point discussion of the requirements outlined in Utah Code § 54-24-203(2). The Division's review of the WFPP included a comparison of the current WFPP to the WFPP that was filed in 2023. The 2026 WFPP includes the following contents:

1. Overview of Utility's Fire Prevention Strategies
2. Utility Asset Overview
3. Risk Analysis and Risk Drivers
4. Wildfire Prevention Strategy and Programs
5. Emergency Response
6. Performance Metrics and Monitoring

The plan was consistent with the WFPP filed in 2023 with some updates. The Company provided an updated overview of its transmission and distribution assets in the Wildfire Hazard Potential (WHP) zone. Notably, Dixie Power reduced its high-risk transmission line-miles from 118 miles (62%) in 2023 to 24 miles (13%) in 2026, while low-risk transmission line-miles increased from 51 miles (27%) in 2023 to 80.6 miles (43%) in 2026. High-risk distribution overhead line-miles decreased from 257 miles (39%) in 2023 to 47.8 miles (9%). Similarly, high-risk distribution underground line miles decreased from 352 miles (52%) in 2023 to 8 miles (0.01%) in 2026.

Dixie Power additionally re-evaluated each of its powerlines' ignition risk relative to the Utah Wildfire Risk Assessment Portal (UWRAP). The Utility provided an updated risk analysis of its lines, work completed since the 2023 Plan, and additional projects needed to reduce ignition risk.¹

The 2026 Plan also highlighted the Forsyth Fire that occurred in 2025 and the Utility's actions in the immediate aftermath of the fire.

In its review, the Division noted that Table 4² states that the plan was approved by Dixie Power's Board of Directors on September 30, 2026, which was a day after the plan was submitted to the Commission. The Division confirmed the official plan approval date via email with Dixie Power's engineering manager and chief financial officer. Dixie Power provided supplementary information to the Division about the internal approval process, which is included as DPU Exhibit 1.1.

Recommendations

The Division recognizes the effort required to compile multi-year WFPPs, track plan progress, and ultimately ensure effective mitigation efforts. The Division provides the following suggestions for Dixie Power to consider which may aid in tracking plan progress and effective mitigation. The Division recommends that Dixie Power consider delineating planned mitigation activities for each year in future WFPP filings. By separating planned activities by year, it may be helpful for the utility to track mitigation efforts more closely.

The Division also recommends that Dixie Power include the estimated yearly cost of planned program activities. Like delineating program activities, providing a yearly forecast of costs may help Dixie Power track spending more effectively.

Finally, the Division recommends that Dixie Power include the date that the plan was approved by its governing body in its future WFPP filings. Utah Code § 54-24-203(3)(d) states: An electric cooperative shall file with the commission a wildland fire protection plan submitted and approved under [section 3]. Given that Utah Code requires plan approval by the utility's

¹ Plan at 11.

² Plan at 56.

governing authority, the Division recommends that the utility include the date that the plan was approved by its governing body within the documentation filed with the commission. This will ensure that the plan meets the legal requirements specified in Utah code.

Conclusion

Based on its review, the Division recommends the Commission acknowledge that Dixie Power has complied with the requirements for Utah Code § 54-24-203(1)-(3). The Division also recommends that Dixie Power consider including the following items in future plans: (1) report on planned program activities for each year included in the WFPP; (2) report on yearly forecasted costs for each year in the WFPP; and (3) the utility should document and report the plan's date of approval by its governing body in its filing with the Commission.

cc: Russell Condie, Dixie Power Engineering Manager
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