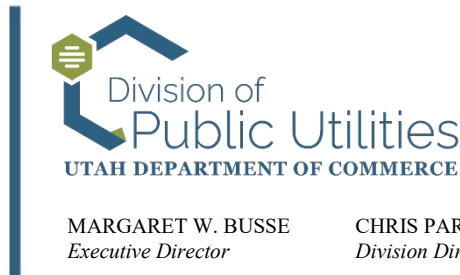


SPENCER J. COX
Governor
DEIDRE M. HENDERSON
Lieutenant Governor



MARGARET W. BUSSE
Executive Director CHRIS PARKER
Division Director

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

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

Date: February 19, 2026

Re: **Docket No. 26-506-01**, Deseret Power Electric Cooperative's 2025 Wildland Fire Protection Plan Annual Compliance Report.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) acknowledge Deseret Generation and Transmission Cooperative's (Deseret or Company) 2025 compliance filing as complying with Utah Code § 54-24-203(4)(b). The Division also recommends that Deseret provide additional information with future compliance filings.

In accordance with suggestions provided to other electric cooperatives, the Division recommends that Deseret consider:

1. Reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. Submitting its annual compliance report for the previous year's activities to its governing board by June 1st.



3. Reporting the actual metrics (including performance metrics) and costs for the current year next to the planned goals and budgets from the approved plan to ensure accountability and transparency of implementation.
4. If Deseret incurs fire suppression costs, reporting them separately from mitigation costs can provide a fuller, more accurate picture of its activities and their effects.

Issue

On January 28, 2026, Deseret filed a copy of its annual Wildland Fire Protection Plan compliance report (Compliance Report). 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 by February 27, 2026. This memorandum represents the Division's response to the Action Request.

Discussion

Deseret is a non-profit rural electric distribution cooperative. Utah Code § 54-24-203(4) requires electric cooperatives to: (a) file with its governing authority an annual report detailing the electric cooperative's compliance with the wildland fire protection plan; and (b) file with the Commission a copy of the annual compliance report described in Subsection (4)(a).

Deseret submitted its 2025 Compliance Report, detailing mitigation actions taken in 2025, to its governing authority on December 18, 2025.

The Compliance Report submitted by Deseret reported that it took the following mitigation actions in 2025:

- Installed 62 insulators along the Bonanza-Upalco transmission corridor
- Upgraded five crossarms and replaced 135 insulators along the Bonanza-Vernal corridor.
- Replaced 3,965 insulators and anchor systems on 10 structures along the Bonanza-Mona transmission corridor

- Conducted vegetation management by clearing 150' wide area between structures 613-624 on the Bonanza-Mona 345 kV Transmission line.

Additionally, Deseret reports spending \$1,046,000 on replacement/maintenance activities. In addition, the Company reports spending \$281,000 on vegetation management work.

Recommendations

Division recommendations found in this filing are consistent with its recommendations in other electric cooperative dockets¹ and are provided to standardize reporting recommendations across all electric cooperatives. The Division recommends that annual reports be completed on a full 12-month calendar-year basis, and that annual reports are submitted to electric cooperatives' governing bodies by June 1st for the previous year. In addition, continuing to report annual mitigation data and costs by category ensures accountability, comparability, and transparency of the plan. The Division also recommends electric cooperative utilities include separate reporting metrics for expenditures related to fire mitigation and fire suppression, if applicable, as the activities of each can differ.

The Division highlights that Utah Code § 54-24-203 is currently silent on an annual submission deadline for electric cooperatives. This stands in sharp contrast to investor-owned utilities, which are clearly required to submit their yearly reports to their governing authority by June 1st. There has been inconsistency in reporting from year to year and between electric cooperative reports. The Commission and the cooperatives may wish to consider setting a date for electric cooperatives' cost and compliance reports. Establishing a submission deadline could eliminate ambiguity and ease review for all parties.

Conclusion

Based on its review of the filing, the Division recommends that the Commission acknowledge that Deseret has complied with the filing requirements for the 2025 Compliance Report under Utah Code § 54-24-203(4)(b). In accordance with the

¹ Docket Nos. 25-025-01, 25-028-06, 25-032-01, 25-066-01, 26-030-01; DPU Comments.

suggestions provided to other electric cooperatives, the Division also provides the following suggestions:

1. Deseret should consider reporting on activities performed under the plan on a full 12-month calendar-year period to ensure comparability and usefulness of the report.
2. Deseret should consider submitting its annual compliance report to its governing authority for the previous year's compliance by June 1st. This could provide clarity and simplify its tasks and others' review.
3. Deseret should report on the actual metrics and costs for the current year next to the planned goals and budgets from the approved plan. This could help ensure accountability and transparency of implementation while increasing the value of the data.
4. If Deseret incurs fire suppression costs, reporting them separately from mitigation costs can provide a fuller, more accurate picture of its activities and their effects.

cc: Jeffrey M Peterson, DPEC General Counsel
Michele Beck, Office of Consumer Services