ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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May 30, 2024

***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 Administrator

RE: **Docket No. 24-035-28 – Rocky Mountain Power's 2024 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 2024 Wildland Fire Cost and Compliance Report ("Report").

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

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Sincerely,

Joelle Steward
Senior Vice President, Regulation

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

# Utah Wildfire Mitigation Plan

## Cost and Compliance Report

## June 1, 2024

# 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 2023 in compliance with the Plan as filed in Docket No. 23-035-44;

2. The actual capital investments and expenses incurred in calendar year 2023 to implement the Wildfire Mitigation Plan ("WMP" or "the Plan")[1] filed in Docket No. 23-035-44, and an updated forecast of the capital investments and OMAG (operations, maintenance administrative and general expenses (also referred to as Expense in this document)) for 2024; 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 October 13, 2020, order in Docket No. 20-035-28. Rocky Mountain Power's Revised 2023 Utah WWMP in Docket No. 23-035-44.

In 2023, Rocky Mountain Power worked diligently to implement the measures set forth in the 2023-2025 WMP[2]. The core principles of the WMP include system-wide situational awareness and operational readiness systems, which are central to identifying and mitigating fire risk. The impact of a fault event can be minimized by using equipment and personnel to isolate the fault and ensure power is safely restored. The frequency of ignition events related to electric facilities can be reduced by engineering a more resilient system, targeted in fire high consequence areas.

# 2 COMPLIANCE WITH THE PLAN

## 2.1 RISK MODELING AND DRIVERS

[1] The terms "wildland fire protection plan" and "wildfire mitigation plan" are synonymous.
[2] Wildfire mitigation plan is in reference to the Rocky Mountain Power's Revised 2023 Utah Wildland Fire Protection Plan as filed on February 28, 2024, in Docket 23-035-44. Docket No: 23-035-44 | Public Service Commission (utah.gov)

### Risk Modeling Tools

Complete development of combined composite risk score - In 2023, Rocky Mountain Power began implementing FireSight, which is part of a broader suite of software from Technosylva referred to as Wildfire Analyst (WFA-E). The FireSight modeling associates wildfire hazards with the location of existing electric assets. The modeling is used to estimate the probability and consequence or impact of a wildfire from a given ignition point along Rocky Mountain Power electric infrastructure. There are two primary parts to the FireSight model: Risk Associated with the Asset Location (RAIL) and Risk Associated with Value Exposure (RAVE). In 2023, attributes from RAIL and RAVE were used to calculate risk scores for wind-driven fires and fuel/terrain-driven fires which were combined to create a composite risk score for circuits in the service territory.

### Fire High Consequence Area (FHCA)

Complete FHCA map update - Throughout 2023, the new modeling tools along with new data and processes were used to evaluate areas throughout Utah for inclusion in the FHCA. The FireSight model was used to model risk scores for wind-driven and fuel/terrain-driven fires on each circuit. Areas that were modeled to be within the 85-100 percentile of the composite risk score were classified as FHCA. The updated modeling and criteria resulted in an FHCA map update with the addition of approximately 1,400 miles of distribution and transmission lines. Implementation of the updated FHCA will begin in 2024, and the Company clarifies that references to FHCA work performed in 2023 throughout this report refer to the FHCA map prior to the update in late-2023/early-2024. The 2023 FHCA map included 220 miles of transmission lines and 429 miles of distribution lines to total 649 combined line miles within the FHCA.

## 2.2 INSPECTION AND CORRECTION PROGRAM

### Distribution and Transmission Facility Point Inspection and Correction

Continue planned inspection programs on transmission and distribution lines - In 2023, Rocky Mountain Power continued inspections in accordance with its general inspection policies and

procedures for areas within the FHCA. The inspections include visual safety inspections and detailed inspections. Table 1 below shows a summary of the planned versus completed asset inspection programs.

Table 1: 2023 Asset Inspection Program Summary

| Inspection Program | Planned[3] (Facility Point Count) | Completed (Facility Point Count) | Outstanding (Facility Point Count) |
|---|---|---|---|
| Distribution Visual Safety | 17,407 | 17,422 | 0 |
| Transmission Visual Safety | 20,888 | 20,888 | 0 |
| Distribution Detail | 1,433 | 1,433 | 0 |
| Transmission Detail | 4,149 | 4,149 | 0 |

Table 1 summarizes that all the planned inspections in 2023 were completed with an additional 15 visual safety inspections performed. Table 2 below summarizes the conditions that were corrected throughout 2023 as a result of the inspection programs and the condition priority.

Table 2: 2023 Summary of Open and Corrected Conditions Identified

| Area | Energy Release Risk | Condition | Correction Timeframe | Open Conditions* | Corrected Conditions |
|---|---|---|---|---|---|
| FHCA | Yes | A – Imminent | Dispatch correction immediately | 0 | 46 |
| FHCA | Yes | A | 60 days average | 1[4] | 42 |
| @FHCA | Yes | B | 12 months | 111 | 941 |
| FHCA | No | A | 120 days average | 7 | 351 |
| FHCA | No | B | not specified | 2,968 | 966 |
| **2023 FHCA** | | | | **3,087** | **2,732** |

**Open conditions as of December 31, 2023*

Table 2 shows there are 112 total open energy release risk conditions identified in 2023. Energy Release Conditions, as defined by Asset Management's general policy for condition priorities and correction time frames, are a type of condition that, under certain

[3] Planned values are based on the 2023 FHCA map. The map update that happened at the end of 2023 did not result in any planned changes for the 2023 calendar year.
[4] At the time of filing the cost and compliance report this priority A condition has been cleared.

circumstances, can correlate to an increased risk of a fault event and potential release of energy at the location of the condition. These conditions are a priority and scheduled to be corrected when locations can be safely accessed by line operations. Open conditions indicate that the defect still exists, but this does not necessarily mean that the corrections are overdue or outside of the specified correction timeframe.

## Transmission Infrared Inspection

Continue enhanced infrared inspections - The infrared inspection is performed to detect potential conditions or "Hot Spots" that could be un-identifiable through the other inspection programs. The lines are scheduled for inspection during peak loading to increase the probability of identifying a thermal rise through the inspection, indicating a potential condition. Table 3 shows the summary of planned and completed line miles for the transmission infrared inspections in 2023.

Table 3: 2023 Transmission Infrared Inspection Summary

| Inspection Program | Planned[5] (Line Miles) | Completed (Line Miles) | Outstanding (Line Miles) |
|---|---|---|---|
| Transmission Infrared Inspection | 1,638 | 1,077 | 561 |

Table 3 indicates that Rocky Mountain Power completed inspections for 1,077 miles, leaving 561 miles outstanding. The outstanding lines have not been inspected because, due to the nature of infrared, hotspots are more visible during peak loading, or when the lines have increased power draw. Therefore, inspections are scheduled during peak loading. Towards the end of the peak loading season in August, when 1,067 line miles were scheduled to be inspected, the vendor had a helicopter crash which prevented the 1,067 line miles from being inspected at that time. The lines missed had the peak loading intervals re-evaluated for alternate inspection times, and 506 of the 1,067 line miles were able to be inspected in October and December. The 561 line miles that were not re-scheduled, due to peak loading

[5] Planned values are based on the 2023 FHCA map. The map update that happened in 2023 did not result in any planned changes for the 2023 calendar year.

constraints, are set for inspection in the 2024 IR inspection program.

## 2.3 VEGETATION INSPECTION AND MANAGEMENT

Continue planned vegetation management programs - In 2023 the vegetation management activities continued, which included an annual inspection of circuits within the FHCA, extended clearances for vegetation in the FHCA, and pole clearing at the base of identified poles. The annual inspection is performed to identify any vegetation that might pose a contact risk with the energized lines so that it can be identified for corrective actions. The extended clearances are performed to reduce the risk that vegetation growth will exceed the minimum distance to the energized lines prior to the next cycle. Pole clearing on equipment poles located in the FHCA involves removing all vegetation within a 10-foot radius, extending up to eight feet vertically, around each pole. Herbicides and/or soil sterilants are then applied to prevent vegetation regrowth. This ensures that if the equipment on the targeted pole releases a spark, there will be no vegetation below to ignite a fire. Table 4 summarizes the planned line miles for inspections and pruning.

Table 4: 2023 Vegetation Inspection and Pruning Summary

| Inspection Program | Planned[5] Miles | Completed Miles | Outstanding Miles |
|---|---|---|---|
| FHCA Distribution Inspection | 1,198 | 1,198 | 0 |
| FHCA Transmission Inspection | 218 | 218 | 0 |
| FHCA Distribution Pruning | 1,198 | 1,198 | 0 |
| FHCA Transmission Pruning | 218 | 218 | 0 |

As shown in Table 4 above, Rocky Mountain Power completed all inspections within the FHCA. There were 1,198 miles of distribution lines inspected and pruned, and 218 miles of transmission lines inspected and pruned.

Table 5 shows the work completed as a result of performing the vegetation management programs.

Table 5: 2023 Vegetation Corrections

| Vegetation Corrections | Total Count |
|---|---|
| Trees Removed | 805 |
| Trees Pruned | 7,154 |
| Poles Cleared | 4,603 |

## 2.4 ENVIRONMENTAL PROGRAM

### Avian Protection Plan and Wildlife Protection Plan

Continued avian protection plan work - Rocky Mountain Power continued implementation of its Utah Avian Protection plan. The avian protection plan is intended to address avian electrocution risks by reducing the likelihood of bird or animal contact. The plan includes pro-active actions including nest management, substation protections, and line element protections or pole retrofits. Nest management activities include relocating the nest or installing avian guards. The activities are performed to reduce the risk of animal contact with energized lines. Pole retrofits are performed to reduce nesting or animal contact in areas where previous incidents have occurred. The Company also partnered 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 6 summarizes the completed activity for the avian protection plan in 2023 for nests managed, poles retrofitted, and nest boxes installed or maintained.

Table 6: 2023 Avian Protection Plan Summary

| Environmental Project | Planned[6] | Completed | Outstanding |
|---|---|---|---|
| Nests Managed | 52 | 105 | 0 |
| Poles Retrofitted | 3,095 | 3,429 | 0 |
| Nest Boxes for Cavity Nesting Birds | - | 500 | 0 |

Table 6 shows that there were 53 additional nests managed and 334 additional poles

[6] Planned values are based on the 2023 FHCA map. The map update that happened in 2023 did not result in any planned changes for the 2023 calendar year.

retrofitted. The nest managed planned number is based on an average amount of nests in a typical year but in 2023 there was an increase in emerging nests that required management. The additional pole retrofits were completed due to efficiency in work and favorable contracts. As shown in Table 20 the work performed was still within the planned budget.

### Habitat and Fire Resiliency

Complete habitat project scoping - The Company worked with Pheasants Forever in 2023 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 2023 the project scopes were completed and funded, with work set to begin in 2024.

## 2.5 SYSTEM HARDENING

### Line Rebuild Program

Complete 2023 line rebuild projects - The company's line rebuild program involves overhead lines within the FHCA that were constructed with bare overhead conductor. As part of the program the lines may either be moved, removed, converted to underground, rebuilt, or retrofitted with more resilient materials such as covered conductor or non-wooden poles. Table 7 shows the 2023 planned line rebuild miles and the miles that were completed.

Table 7: 2023 Line Rebuild Summary

| Line Rebuild Project | Planned[7] | Completed | Outstanding |
|---|---|---|---|
| Transmission Miles | 12 | 12 | 0 |
| Distribution Miles | 37 | 37 | 0 |
| Total Miles | 49 | 49 | 0 |

[7] Planned values are based on the 2023 FHCA map. The map update that happened in 2023 did not result in any planned changes for the 2023 calendar year.

As a result of the line rebuild program the planned scopes for 2023 were completed on the distribution and transmission miles identified in the line rebuild project. The completion of the projects are line miles that were hardened with covered conductor or more resilient materials.

## Advanced System Protection

Complete 2023 planned equipment upgrade projects - The replacement and upgrading of electro-mechanical relays and microprocessors throughout circuits within and interconnected to the FHCA continued in 2023. The replacement of relays provides multiple wildfire mitigation benefits including increased programmed function speed compared to an electro-mechanical relay. Most importantly, the faster relay limits the length and magnitude of fault events. The equipment upgrades also enable customized settings to address environmental conditions. As part of replacing an electro-mechanical relay, the associated circuit breaker or other line equipment may also be replaced, as appropriate, to facilitate the functionality of a microprocessor relay. Table 8 shows the completed status compared to what was planned for the different equipment replaced or upgraded in 2023.

Table 8: 2023 Advanced System Protection Summary

| Equipment | Planned | Completed | Outstanding |
|---|---|---|---|
| Distribution Relay Replacement | 25 | 25 | 0 |
| Transmission Relay Replacement | 9 | 9 | 0 |
| Recloser Replacement | 20 | 20 | 0 |
| Total | 54 | 54 | 0 |

As shown in Table 8, the completed replacement of 54 devices allows for greater customization and will allow for the settings to be updated based on environmental conditions.

## Expulsion Fuse Replacements

Complete 2023 planned expulsion fuse replacements - In an effort to reduce the arcing

experienced from an expulsion fuse operation, expulsion fuses are being replaced proactively within the FHCA. The total scope of expulsion fuse replacements span multiple years over many circuits across the company's service territory. Table 9 shows the expulsion fuses planned for replacement and what was completed in 2023.

Table 9: 2023 Expulsion Fuse Replacement Summary

| Equipment | Planned | Completed | Outstanding |
|---|---|---|---|
| Expulsion Fuses Replaced | 1,790 | 1,790 | 0 |

The replacement of 1,790 expulsion fuses as shown in Table 9 are locations where the arcing potential during operation will be reduced through the new fuse.

### Fault Indicators

Complete 2023 planned fault indicator replacements - Fault indicators are being installed to reduce outage duration, such as those experienced due to enhanced recloser or relay settings. Fault indicators assist in response times as the location of the fault can be determined quicker when a patrol inspection is required. Table 10 shows that 200 communicating fault circuit indicators (CFCI) were installed as replacements in 2023. The 200 replacements were to replace broken or malfunctioning CFCI devices previously installed.

Table 10: 2023 CFCI Summary

| Equipment | Planned | Completed | Outstanding |
|---|---|---|---|
| CFCI Replacements | 200 | 200 | 0 |
| Total | 200 | 200 | 0 |

## 2.6 SITUATIONAL AWARENESS PROGRAM

### Meteorology Department

Continued weather modeling - PacifiCorp's experienced meteorology department is an essential group that gathers data and interprets and translates the data into an assessment of risk specific for the utility. The assessment is a key component in decision making as described

in the Assessing the District Fire Risk section of the WMP (at page 84). The department uses an operational Weather and Research Forecast (WRF) model and a complimentary 30-year WRF reanalysis across the Company's entire service territory. The model created a comprehensive forecast of atmospheric, fire weather, and National Fire Danger Rating System parameters out to 96 hours (4-days). The forecast is overlayed on the electrical distribution and transmission network for further analysis. In 2023 the meteorology department continued to analyze the daily risk as described in Assessing the District Fire Risk section of the WMP.

## Weather Station Network

Expand weather station network - The Company found that publicly available weather data can have limitations. The utility does not have visibility into the maintenance and calibration of public weather stations, and the frequency of data collection may not match the needed intervals for performing real-time risk assessments and dynamic modeling. As a result, the Company installed additional weather stations throughout the state. The weather station network is regularly evaluated as the network expands for continual improvement.

Complete annual weather station maintenance - An important component of the weather station network is the annual maintenance performed on existing weather stations. All weather stations installed by December 31st, 2022, required annual calibrations in 2023.

Table 11 below shows the planned and actuals for weather stations installed and weather stations maintained in 2023.

Table 11: 2023 Weather Station Installation and Maintenance Summary

| Initiative | Planned | Completed | Outstanding |
|---|---|---|---|
| Weather Station New Installs | 25 | 25 | 0 |
| Annual Weather Station Maintenance | 105 | 105 | 0 |

## Seasonal Wildfire Risk

Continued use of weather modeling tools - In 2023 the Company continued to use the Wildfire Analyst Enterprise (WFA-E) modeling tools from Technosylva. The main modules used by meteorology for WFA-E are FireRisk and FireSim. FireRisk is a product that models 8-hour wildfires simulated at 100 meter intervals every three hours across the entire system. The data produced provides wildfire risk metrics such as a fire's potential size, which is used to understand the fire risk across the service territory. In 2023 the output of these models were used to inform the District Fire Risk.

### Assessing the District Fire Risk

Continued daily district fire risk assessments – In 2023 the meteorology group developed an index called the Modified Hot-Dry-Windy Index or mHDWI. The index uses fuels and weather conditions to assess wildfire potential, and when used in combination with wind gust percentiles, the data provides wildfire risk levels in the daily forecast. The daily forecasts are used to identify the weather conditions and which areas might have an elevated, significant, or extreme risk of wildfire. Alongside the mHDWI the fuels and fire conditions are part of the analysis performed to identify the wildfire risk. An accomplishment in 2023 was the development of the mHDWI to aid in the district fire risk assessment, but it is acknowledged that this assessment is completed daily and is ongoing in nature.

## 2.7 SYSTEM OPERATIONS

Continue deployment of enhanced safety settings - The Company developed enhanced safety settings formerly referred to as elevated fire risk settings that are enabled to reduce the potential energy released in a fault event. The settings can be enabled based on the daily risk assessment performed by the meteorology group. Relays and line reclosers are an example of devices that can have the enhanced settings enabled.

## 2.8 FIELD OPERATIONS AND WORK PRACTICES

### Modified Work Practices

Continue field implementation of wildfire programs – The field crews incur incremental labor, as additional resources are required, to support system operations in assessing localized risk and administering enhanced safety settings. District Fire Risk is used to inform additional patrols and coordination. As discussed within the system operation section there can be different re-energization practices that require patrols or assessments. In 2023, Table 12 below shows the quantity of circuits patrolled that were completed on distribution and transmission circuits based on risk assessments.

Table 12: 2023 Additional Patrols Completed

| Patrol Type | Circuit Count |
|---|---|
| Transmission | 27 |
| Distribution | 150 |
| Total | 177 |

## Mobile Communication Devices

Procure additional communication equipment to aid in response - In order to respond effectively in locations throughout the service territory where there may not be cellular connectivity, Rocky Mountain Power procured alternate satellite communication devices. The satellite devices expand the rapid response capability from the cellular on wheels device that was procured in 2022. The devices are strategically placed throughout the service territory and used during a major event to improve communication capabilities to the control center, base camp, and/or management. The devices support emergency restoration activities through increased communication ability which can help mitigate impacts to customers.

Table 13: 2023 Mobile Communication Devices Ordered

| Device | Ordered |
|---|---|
| Alternate Satellite Communication Device | 6 |

### Equipment and Tool Purchases

Procure vehicles and equipment to aid in wildfire mitigation - Rocky Mountain Power procured additional equipment and vehicles to mitigate wildfire risk. Some of the equipment procured includes basic fire suppression equipment which allows field personnel to extinguish small fires that ignite while they are working in the field. Fire trucks were procured for work required to be completed in the FHCA, the equipment could be on hand to water down vegetation in the work area to minimize the chance of an ignition. Other equipment includes vehicles to aid in patrols in remote locations as well as equipment to help restoration efforts. Table 14 below shows the equipment that was procured in 2023 for wildfire mitigation.

Table 14: 2023 Equipment and Tools Purchased

| Equipment | Quantity | Use Description |
|---|---|---|
| Backhoes | 1 | Restoration efforts |
| Backhoe trailers | 1 | Restoration efforts |
| Forklift | 3 | Material management |
| Forklift trailer | 3 | Material management |
| UTV (side by side) | 9 | Field Patrols |
| UTV trailer | 9 | Field Patrols |
| Fire trucks | 5 | Field work in fire season |

### Wildfire Training Material

Develop wildfire eBooks and training applications - Beginning in 2023, with completion expected in 2024, Rocky Mountain Power is developing training materials which includes eBooks and mobile applications to be available for internal employees. The goal with the training materials is to prepare and train crews before an event happens in order to reduce response time and aid in the effectiveness of the response. The topics include wildfire protection, roles and responsibilities, and Public Safety Power Shutoff. The applications will include interactive scenarios for the crews to walk through to inform and guide actions should an incident occur.

## 2.9 PUBLIC SAFETY POWER SHUTOFF (PSPS)

### 2023 PSPS Experience

Continue PSPS readiness - In 2023 the Company did not experience conditions that would require a PSPS Watch or a PSPS event in Utah.

## 2.10 EMERGENCY MANAGEMENT WILDFIRE RESPONSE

Continue wildfire response readiness - The Company's emergency response is guided by the National Incident Management System (NIMS). The approach is applicable to any type of wildfire event, ranging from a relatively small wildfire that can be controlled by a local fire suppression agency, to larger wildfire events that require a coordinated interagency response.

## 2.11 PUBLIC SAFETY PARTNER COORDINATION STRATEGY

Complete events with public safety partners for emergency response - As part of emergency preparedness efforts, Rocky Mountain Power takes a multi-step approach in coordination with public safety partners on wildfire mitigation and PSPS preparedness. The strategy includes outreach, workshops, and tabletop exercises. The outreach efforts include meetings and workshops throughout the year across the service territory with public safety partners. The design of the informal discussions in meetings or workshops is intended to orient participants to a new concept or procedure. Workshops that are performed are more local, with targeted discussions that build upon the general outreach. The workshops are aimed to refine plans, streamline processes, and confirm capabilities. Finally, tabletop exercises develop awareness of PSPS planning and procedures. Table 15 below shows how many events were conducted in 2023.

Table 15: 2023 Public Safety Partner Events

| Activity | Quantity |
|---|---|
| Public Safety Partner Events | 16 |

### Public Safety Partner Portal

Implement improvements to Public Safety Partner Portal - In 2023 Rocky Mountain Power

continued development of the Public Safety Partner Portal with an official launch in 2024. The portal is a secure web-based portal where critical information can be 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. The development of the portal is on track for deployment in 2024.

## 2.12 WILDFIRE SAFETY AND PREPAREDNESS ENGAGEMENT STRATEGY

Continue community outreach about wildfire safety - The Company employs a multifaceted approach to support community engagement and outreach with the goal of providing clear, actionable, and timely 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 a variety of strategies including webinars, targeted paid advertising campaigns, informational videos featuring company subject matter experts, press engagement, distributed print materials, infographics, social media updates, and communication through bill messages, emails and website content, and other communication channels. Table 16 below shows work completed in 2023 to increase community awareness.

Table 16: Community Outreach to Raise Awareness

| Activity | Date Completed |
|---|---|
| Translate website into Spanish | June 2023 |
| Conduct community webinar | July 2023 |

## 2.13 INDUSTRY COLLABORATION

Continue industry collaboration involvement - Industry collaboration is performed to maintain an understanding of best practices and allows for collaboration with experts regarding new technologies and research. The Company is a member of the International Wildfire Risk Mitigation Consortium (IWRMC) which is an industry-sponsored collaborative designed to facilitate the sharing of wildfire risk mitigation insights. The Company also plays leadership and support roles through other organizations such as the Edison Electric Institute, the Electric Sector Coordinating Council, and the Institute of Electrical and Electronics

Engineering.

Participate in climate risk initiative - Beginning in 2023, the Company began participating in a three-year Electric Power Research Institute Climate Resilience and Adaption Initiative (READi). The goal is to work with industry stakeholders and other utilities to develop a common framework to assess climate risk, address resilience, and evaluate investments.

## Plan Monitoring and Implementation

Complete 2023 WMP and ensure adherence to Plan - In 2023 the Wildfire safety program Delivery group developed the 2023 Utah WMP. The group ensures that each initiative is progressing toward the established plan. Initiative owners are responsible for developing individual project plans to ensure the plan objectives are met, while the Wildfire Safety Program delivery group ensures the project plans are aligned with the WMP's objectives. The group performs regular status checks with the initiative owners to ensure that risk and issues are being monitored and that prompt action is taken to resolve issues for successful project execution.

Table 17: Summary of 2023 Compliance with Plan

| Section Number | Section | Plan | Compliance Details |
|---|---|---|---|
| 2.1 | Risk Modeling and Drivers | Develop Composite Risk Score | Completed development for combined composite risk score. |
| | | Complete FHCA Map Update | Completed FHCA MAP update. |
| 2.2 | Inspection and Correction Program | Continue standard inspection programs:<br>Distribution Visual Safety: 17,407<br>Transmission Visual Safety: 20,888<br>Distribution Detail: 1,433<br>Transmission Detail: 4,149 | Completed standard inspection programs:<br>Distribution Visual Safety: 17,407<br>Transmission Visual Safety: 20,888<br>Distribution Detail: 1,433<br>Transmission Detail: 4,149 |
| | | Perform infrared inspection on 1,638 miles of transmission lines. | Completed 1,077 miles of transmission IR inspections. |
| 2.3 | Vegetation Management | Perform FHCA vegetation inspections and corrections:<br>Distribution Miles: 1,198<br>Transmission Miles: 218 | Perform FHCA vegetation inspections and corrections:<br>Distribution Miles: 1,198<br>Transmission Miles: 218<br>Program resulted in 805 trees removed, 7,154 trees pruned, and 4,603 poles cleared. |
| 2.4 | Environmental | Manage 52 nests and retrofit 3,095 poles | Completed environmental work that resulted in 105 nests managed, 3,429 poles retrofitted, and 500 nest boxes maintained for cavity nesting birds. |

| Section Number | Section | Plan | Compliance Details |
|---|---|---|---|
| | | Complete project scoping for habitat improvements | Completed project scoping with pheasants forever for habitat improvements to be completed in 2024. |
| 2.5 | System Hardening | Complete line rebuild projects:<br>12 miles of transmission lines<br>37 miles of distribution lines | Completion of 49 miles of Line rebuild (12 transmission line miles, 37 distribution line miles) |
| | | Complete Device Upgrades:<br>25 distribution relays<br>9 transmission relays<br>20 recloser replacement | Completion of 54 device upgrades (25 distribution relays, 9 transmission relays, 20 recloser replacements). |
| | | Complete 1,790 expulsion fuse replacements | Completion of 1,790 expulsion fuses replaced. |
| | | Complete 200 CFCI replacements | 200 CFCI installed as replacements. |
| 2.6 | Situational Awareness Program | Continued weather modeling by meteorology department | Completed - Meteorology's department as essential for gathering data, interpreting data, and translates data into an assessment of risk. |
| | | Expand weather station network with 25 additional weather stations | Completed installations of 25 additional weather stations. |
| | | Complete annual weather station maintenance on 105 weather stations | Completed maintenance on 105 weather stations. |
| | | Continue use of weather modeling tools. | Completed - The use of WFA-E modeling with FireRisk and FireSim to understand the fire risk across the service territory. |
| | | Continue daily district fire risk assessments | Completed the development of the Modified Hot-Dry-Windy Index mHDWI to aid in district fire risk assessments. |
| 2.7 | System Operations | Continue deployment of enhanced safety settings | Completed - The use of enhanced safety settings were utilized in 2023. |
| 2.8 | Field Operations and Work Practices | Procure additional communication equipment to aid in field response. | Purchased 6 Starlink Satellite communication devices. |
| | | Procure vehicles to aid in wildfire mitigation. | Completed purchases of fire trucks, backhoes, forklifts, UTV's, and equipment trailers. |
| | | Develop wildfire training resource material | Development began on wildfire training eBooks and Applications for delivery in 2024. |
| 2.9 | Public Safety Power Shutoff (PSPS) | Continue PSPS Readiness | Completed PSPS readiness and no PSPS events were required in 2023. |
| 2.1 | Emergency Management Wildfire Response | Continue wildfire response readiness | Completed and the Company's emergency response is guided by NIMS. |
| 2.11 | Public Safety Partner Coordination Strategy | Complete events with public safety partners for emergency response. | Completed 16 events with public safety partners. |
| | | Implement improvements to the Public Safety Partner Portal. | In 2023 the development began for Public Safety Partner Portal and is on track for delivery in 2024. |
| 2.12 | Wildfire Safety and Preparedness Engagement Strategy | Continue community outreach about wildfire safety | Translated the website into Spanish and conducted 1 community webinar. |
| 2.13 | Industry Collaboration | Continue industry collaboration involvement | Continued membership with the IWRMC. |

| Section Number | Section | Plan | Compliance Details |
|---|---|---|---|
| | | Participate in climate risk initiative | Rocky Mountain Power began participating in a three-year study referenced as Climate READi. |
| 2.14 | Plan Monitoring and Implementation | Complete 2023 WMP and ensure adherence to the plan | The team responsible developed the WMP and is actively tracking initiatives. |

# 3 CAPITAL AND O&M EXPENDITURES, FORECASTS AND PLAN UPDATES

## 3.1 CAPITAL SPEND SUMMARY

In 2023, Rocky Mountain Power invested $103.7 million of capital expenditures into the Wildfire Mitigation programs described in this Report, which are accounted for in Table 18 below.

Table 18: Wildfire Mitigation Plan Implementation Summary – Capital Actuals

| Mitigation Program ($ Millions) | 2023 | | | |
|---|---|---|---|---|
| | Actuals | Plan[8] | Variance | Variance Description |
| **Distribution** | | | | |
| *Risk Modeling and Drivers | $2.3 | $2.5 | ($0.2) | Costs are within 10% of plan |
| Inspection and Corrections | $13.8 | $16.4 | ($2.6) | Expulsion fuse replacements were originally classified under inspection and correction and are better classified as system hardening work. |
| Environmental | $1.4 | $1.3 | ($0.1) | Costs are within 10% of plan |
| System Hardening | $53.7 | $51.6 | $2.1 | Expulsion fuse replacements were originally classified under inspection and correction and are better classified as system hardening work. |
| Situational Awareness | $1.4 | $1.4 | $0.0 | N/A |
| Field Operations and Work Practices | $5.8 | $6.2 | ($0.4) | Costs are within 10% of plan |
| *Public Safety Partner Coordination | $1.9 | $2.0 | ($0.1) | Costs are within 10% of plan |
| **Total Distribution** | **$80.4** | **$81.4** | **($1.0)** | **Costs are within 10% of plan** |
| **Transmission** | | | | |
| **System Hardening | $23.3 | $22.3 | $1.0 | Costs are within 10% of plan |
| Environmental | $0.0 | $0.1 | ($0.1) | Costs are within 10% of plan |
| **Total Transmission** | **$23.3** | **$22.4** | **$0.9** | **Costs are within 10% of plan** |
| **Total Costs** | **$103.7** | **$103.8** | **($0.1)** | **Costs are within 10% of plan** |

[8] Plan values are from the Rocky Mountain Power's Revised 2023 Utah Wildland Fire Protection Plan as filed on February 28, 2024, in Docket 23-035-44. Docket No: 23-035-44 | Public Service Commission (utah.gov).

Table 19 below shows actual 2023 capital expenditures as well as expenditures planned for 2024-2025, as documented within the 2023 Utah WMP. At this time, there are no projected changes to 2024 or 2025 planned expenditures.

Table 19: Wildfire Mitigation Plan Implementation Summary – Capital Plan 2023-2025

| Mitigation Program ($ Millions) | 2023 Actuals | 2024 Plan[9] | 2025 Plan[9] | Totals |
|---|---|---|---|---|
| **Distribution** | | | | |
| *Risk Modeling and Drivers | $2.3 | $3.0 | $0.6 | $5.9 |
| Inspection and Corrections | $13.8 | $20.0 | $20.0 | $53.8 |
| Environmental | $1.4 | $0.9 | $0.5 | $2.8 |
| System Hardening | $53.7 | $50.0 | $85.0 | $188.7 |
| Situational Awareness | $1.4 | $1.7 | $0.3 | $3.4 |
| Field Operations and Work Practices | $5.8 | $0.4 | $0.5 | $6.7 |
| *Public Safety Partner Coordination | $1.9 | $0.0 | $0.0 | $1.9 |
| **Total Distribution** | **$80.4** | **$76.0** | **$106.9** | **$263.3** |
| **Transmission** | | | | |
| **System Hardening | $23.3 | $35.0 | $50.0 | $108.3 |
| Environmental | $0.0 | $0.0 | $0.0 | $0.0 |
| **Total Transmission** | **$23.3** | **$35.0** | **$50.0** | **$108.3** |
| **Total Costs** | **$103.7** | **$111.0** | **$156.9** | **$371.6** |

**Costs shown as Utah's portion of the system allocated costs.*
***Cost shown represents total expenditure in Utah. A portion of the expenditures will be system allocated to other states when the asset is placed in-service.*

## 3.2 O&M SPEND SUMMARY

In 2023, Rocky Mountain Power spent approximately $18.0 million in operation and maintenance (O&M) activities for Wildfire Mitigation as shown in Table 20 below.

Table 20: Utah Wildfire Mitigation Plan Implementation Summary – O&M Actuals

| Mitigation Program ($ Millions) | 2023 | | | |
|---|---|---|---|---|
| | Actuals | Plan | Variance | Variance Description |
| **Distribution** | | | | |
| Risk Modeling and Drivers | $1.5 | $1.5 | $- | N/A |
| Inspection and Corrections | $7.5 | $7.5 | $- | N/A |
| Vegetation Management | $2.0 | $2.0 | $- | N/A |

[9] Plan values are from the Rocky Mountain Power's Revised 2023 Utah Wildland Fire Protection Plan as filed on February 28, 2024, in Docket 23-035-44. Docket No: 23-035-44 | Public Service Commission (utah.gov).

| Mitigation Program ($ Millions) | 2023 | | | |
|---|---|---|---|---|
| | Actuals | Plan | Variance | Variance Description |
| Environmental | $0.3 | $0.3 | $- | N/A |
| System Hardening | $0.2 | $0.2 | $- | N/A |
| Situational Awareness | $2.6 | $2.6 | $- | N/A |
| Field Operations and Work Practices | $2.3 | $1.0 | $1.3 | Risk assessments identified additional circuits that required field patrols. |
| PSPS Program | $0.0 | $1.1 | ($1.1) | There were no PSPS events which resulted in $0 actuals. |
| Public Safety Partner Coordination | $0.1 | $0.1 | $- | N/A |
| WMP Engagement Strategy | ($0.0) | $0.1 | ($0.5) | There was a refunded amount of $0.04M for previously paid for work. Actuals represented may differ slightly due to rounding. |
| Industry Collaboration | $0.0 | $0.1 | ($0.1) | There was a credit applied to the account which balanced out the invoiced cost for the year. |
| Plan Monitoring and Implementation | $0.4 | $0.3 | $0.1 | The actuals for the grant application work performed were slightly higher than forecasted. |
| **Total Distribution** | **$16.9** | **$16.8** | $0.1 | Rounding might cause actuals to be slightly off compared to plan. |
| **Transmission** | | | | |
| Inspection and Corrections | $0.4 | $0.4 | $- | N/A |
| Vegetation Management | $0.2 | $0.2 | $- | N/A |
| System Hardening | $0.4 | $0.4 | $- | N/A |
| Field Operations and Work Practices | $0.1 | $0.1 | $- | N/A |
| **Total Transmission** | **$1.1** | **$1.1** | $- | N/A |
| **Total Costs** | **$18.0** | **$17.9** | **$0.1** | **Costs are within 10% of plan** |

Table 21 below shows 2023 actual expenditures and the 2024-2025 planned expenditures as documented within the 2023 Utah WMP. At this time, there are no projected changes to 2024 or 2025 planned expenditures.

Table 21: Utah Wildfire Mitigation Plan Implementation Summary – O&M Plan 2023-2025

| Mitigation Program ($ Millions) | 2023 Actuals | 2024 Plan[10] | 2025 Plan[10] | Totals |
|---|---|---|---|---|
| **Distribution** | | | | |
| Risk Modeling and Drivers | $1.50 | $2.2 | $2.2 | $5.9 |
| Inspection and Corrections | $7.50 | $13.5 | $13.5 | $34.5 |
| Vegetation Management | $2.02 | $3.6 | $3.6 | $9.2 |
| Environmental | $0.25 | $0.5 | $0.5 | $1.3 |

[10] Plan values are from the Rocky Mountain Power's Revised 2023 Utah Wildland Fire Protection Plan as filed on February 28, 2024, in Docket 23-035-44. Docket No: 23-035-44 | Public Service Commission (utah.gov).

| Mitigation Program ($ Millions) | 2023 Actuals | 2024 Plan[10] | 2025 Plan[10] | Totals |
|---|---|---|---|---|
| System Hardening | $0.2 | $0.2 | $0.3 | $0.7 |
| Situational Awareness | $2.6 | $3.2 | $3.0 | $8.8 |
| Field Operations and Work Practices | $2.3 | $1.5 | $1.6 | $5.4 |
| PSPS Program | $0.0 | $1.1 | $1.1 | $2.2 |
| Public Safety Partner Coordination | $0.1 | $0.1 | $0.1 | $0.3 |
| WMP Engagement Strategy | ($0.0) | $0.3 | $0.3 | $0.6 |
| Industry Collaboration | $0.0 | $0.1 | $0.1 | $0.2 |
| Plan Monitoring and Implementation | $0.4 | $0.2 | $0.2 | $0.8 |
| **Total Distribution** | **$16.9** | **$26.5** | **$26.5** | **$69.8** |
| **Transmission** | | | | |
| Inspection and Corrections | $0.4 | $1.0 | $1.0 | $2.4 |
| Vegetation Management | $0.2 | $0.3 | $0.3 | $0.8 |
| System Hardening | $0.4 | $0.4 | $0.4 | $1.2 |
| Field Operations and Work Practices | $0.1 | $0.2 | $0.2 | $0.5 |
| **Total Transmission** | **$1.1** | **$1.9** | $1.9 | $4.9 |
| **Total Costs** | **$18.0** | **$28.4** | **$28.4** | **$74.7** |

# 4 CHANGES TO THE PLAN

There are no significant updates since the filing of the Revised 2023 Utah WMP (filed on February 28, 2024).

# 5 COST RECOVERY

For purposes of cost recovery, the Utah Public Service Commission established a wildfire mitigation balancing account in the Company's general rate case, 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 general rate case included a base level of costs in Utah rates as of January 1, 2021, and variances from the amount included in rates have been calculated and deferred on a monthly basis. The Company presents the balance of the wildfire mitigation balancing account in the results of operations reports, most recently filed in Docket No. 24-035-11 on April 18, 2024 (page 8.11). The Company plans to request recovery of the balance in the next general rate case, Docket No. 24-035-04.

## CERTIFICATE OF SERVICE

Docket No. 24-035-28

I hereby certify that on May 30, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

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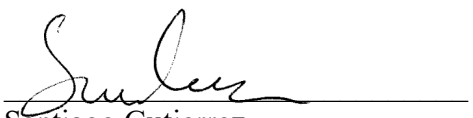

Santiago Gutierrez
Coordinator, Regulatory Operations