



# **Empire Electric Association, Inc.**

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October 15, 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. 24-025-01 – Empire Electric Association’s 2024 Wildland Fire Protection Compliance Report**

Pursuant to Utah Code Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, (“the Company”) hereby submits its 2024 Wildland Fire Protection Compliance Report.

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

By E-mail (preferred): [engineering@eea.coop](mailto:engineering@eea.coop)  
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By regular mail: Engineering  
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Informal inquiries may be directed to Dalton Randolph at (970) 564-4418.

Sincerely,

Dalton Randolph  
System Engineer

# 2024 EEA WILDLAND FIRE PROTECTION PLAN COMPLIANCE REPORT

Approved on October 11, 2024 by the Empire Electric Association, Inc. Board of Directors.

## INTRODUCTION

Consistent with Utah Code §§ 54-24-203 (4) and 54-24-203 (2), Empire Electric Association, Inc. (EEA) submitted the annual Wildland Fire Protection Plan (WFPP) compliance report to the EEA Board of Directors (Board) on October 11, 2024, providing plan implementation (completed and scheduled) for high-risk areas of Utah served by EEA.

## PLAN IMPLEMENTATION

1. The three substations that serve areas within the state of Utah, Monticello Rural (MU), Blue Door (BD) and Dove Creek (DC), were inspected (including substation protection devices) in 2024 as follows:
  - a. Dove Creek: 1/3, 2/1, 3/4, 4/1, 5/2, 6/3, 7/1, 8/1, 9/3, 10/1
  - b. Monticello Rural: 1/3, 2/1, 3/4, 4/1, 5/2, 6/3, 7/1, 8/1, 9/3, 10/1
  - c. Blue Door: 1/2, 1/29, 2/29, 4/3, 5/2, 5/28, 7/16, 8/5, 9/9, 10/1
2. Regulator maintenance is on a five-year cycle. The line regulator that feeds Squaw Point had maintenance completed in May 2021. Three - 167kVA regulators have been sent to be rebuilt to replace the regulators at MU. Three - 114kVA regulators have been ordered to replace the regulators at DC. Replacement will be made as soon as the regulators arrive.
3. Line patrols are scheduled for every three years. All circuits from the MU substation and DC3 were patrolled in May 2022. They will be patrolled again summer of 2025.
4. Substation circuit breaker maintenance traditionally occurs every three years or 70 operations, whichever occurs first. The G&W Viper reclosers used on MU and DC circuits have no maintenance other than cleaning and checking connections, they are a pass or fail device. The Viper does have a duty cycle and target count with the goal to replace the vipers when the duty cycle approaches 100%. All DC and MU G&W Vipers are under their duty cycle. The Viper protecting MU 3 was replaced due to nuisance tripping in spring 2023. It was determined that the voltage, current and control cable was faulty, so cables were replaced for all the Viper reclosers on the DC and MU substations.
5. Poles are tested on a 12-year cycle and the poles in the high-risk fire danger areas were last tested in 2020 for Monticello Rural, and 2022 for Dove Creek. They are due to be tested again in 2032 and 2034 respectively. Poles may also be identified for replacement during line patrols or routine line work. One pole was replaced on MU3 and one on MU2 in the Spring/Summer 2024.
6. Tree-trimming in the EEA right-of-way was done on the MU circuits in 2023 and the DC3

circuit in 2024.

7. EEA WFPP Paragraph 4.a. specifies that the MU 1 and MU 3 feeders protection devices in the Monticello Rural substation and the DC 3 protection device in the Dove Creek substation will be upgraded to Arc Sensing Technology recloser controls by June 2023. We have installed the SEL 651R's with high impedance fault detection (HIFD)/arc sense technology at the Monticello Rural substation. MU1 and MU3 have arc sense active now. External current transformers (CTs) are required on the DC 3 protection device due to too low of load current on the feeder. Supply chain and improper hardware issues, have delayed the installation of external CTs on the DC 3 protection device, making HIFD impossible. As soon as substation technicians receive the necessary equipment, HIFD will be implemented.
8. All the system protection devices that were determined to serve high-risk fire danger areas were put on the "summer" settings (non-reclose) as of 4/8/2024. These devices were identified in paragraph 4.b. of the EEA WFPP. The devices identified in the EEA WFPP are still currently on the summer settings.
9. Since there were no wildland fires in our Utah service territory in 2024, we did not have to implement emergency outage or electrical power restoration procedures.

## WFPP CHANGES

A new WFPP was submitted to the Utah PSC, docket number 23-025-01, in August 2023. Minor changes were made from the 2020 version, with the biggest difference being the time extension to have HIFD implemented at the Dove Creek substation. No changes are recommended at this time, however there are areas of concern that we are monitoring to see if changes will be needed in the future.

1. One area of concern is the language concerning Substation Circuit Breakers in Exhibit "C" – EEA Maintenance Master Plan - Circuit Breaker Maintenance. Due to electronic reclosers having a manufacturer recommended duty cycle, implementation of maintenance on the basis of number of operations is unnecessary.

## CONCLUSION

EEA will continue to comply with the present WFPP for the next year. In 2023 EEA submitted a new plan to follow for the next three years, according to the statutes. EEA will continue to submit an annual compliance report as required.