



**Department of Public Service Regulation
Montana Public Service Commission**

**PERFORMANCE PLAN
FISCAL YEAR 2027
DRAFT
(September 1, 2026)**

Pursuant to MCA 2-12-104, the Montana Department of Public Service Regulation (DPSR) must prepare an Annual Performance Plan. In compliance with Montana Code Annotated, the plan is to include:

1. A description of the functions and divisions of the department, including a discussion of the department's priorities;
2. Initiatives of the department that reflect the benefits and outcomes the department expects to achieve on behalf of the public or specific groups through its divisions; and,
3. Specific and measurable performance procedures for initiatives, including the preferred outcomes and outputs with respect to each initiative.

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1. INTRODUCTION

The Department of Public Service Regulation (DPSR) was created by the legislature to regulate the rates, service quality, and business practices of investor-owned electric, natural gas, water, wastewater, and legacy telecommunications companies. The Department is headed by the Montana Public Service Commission (PSC), a five-member board of elected Commissioners.

In addition to its utility oversight, the PSC contributes to public safety through the inspection of railroads and the monitoring of intra-state natural gas pipeline infrastructure. The DPSR also grants operating authority and enforces insurance requirements for certain classes of motor carriers, like garbage hauling. These industries, while diverse in function, share a defining characteristic: they operate as monopolies in their service territories, meaning customers often have no alternative providers, or very limited alternatives. Because of this, the PSC plays a crucial role in protecting the public interest, ensuring that utility services remain reliable, affordable, and are delivered safely. The Commission must carefully balance the concerns of ratepayers who are impacted by utility costs with the financial needs of utility companies, which must remain solvent and well-maintained in order to deliver uninterrupted service.

2. DEPARTMENT'S CORE REQUIREMENTS

DUTY

It is the duty of the DPSR to supervise and regulate the operations of public utilities, common carriers, railroads, and other regulated industries listed in Montana Code Annotated (MCA) Title 69. Such regulation and supervision are limited by and shall be in conformance with Title 69.

It is the duty of the DPSR staff to provide competent, professional support to the Commission in these endeavors.

MISSION

It is the mission of the DPSR to fairly balance the interests of regulated companies and the public they serve.

It is the mission of the DPSR staff to provide competent, professional support to the Commission in this endeavor.

VISION

It is the vision of the DPSR to lead by example in establishing the DPSR as:

A model of good governance.

A great place to work.

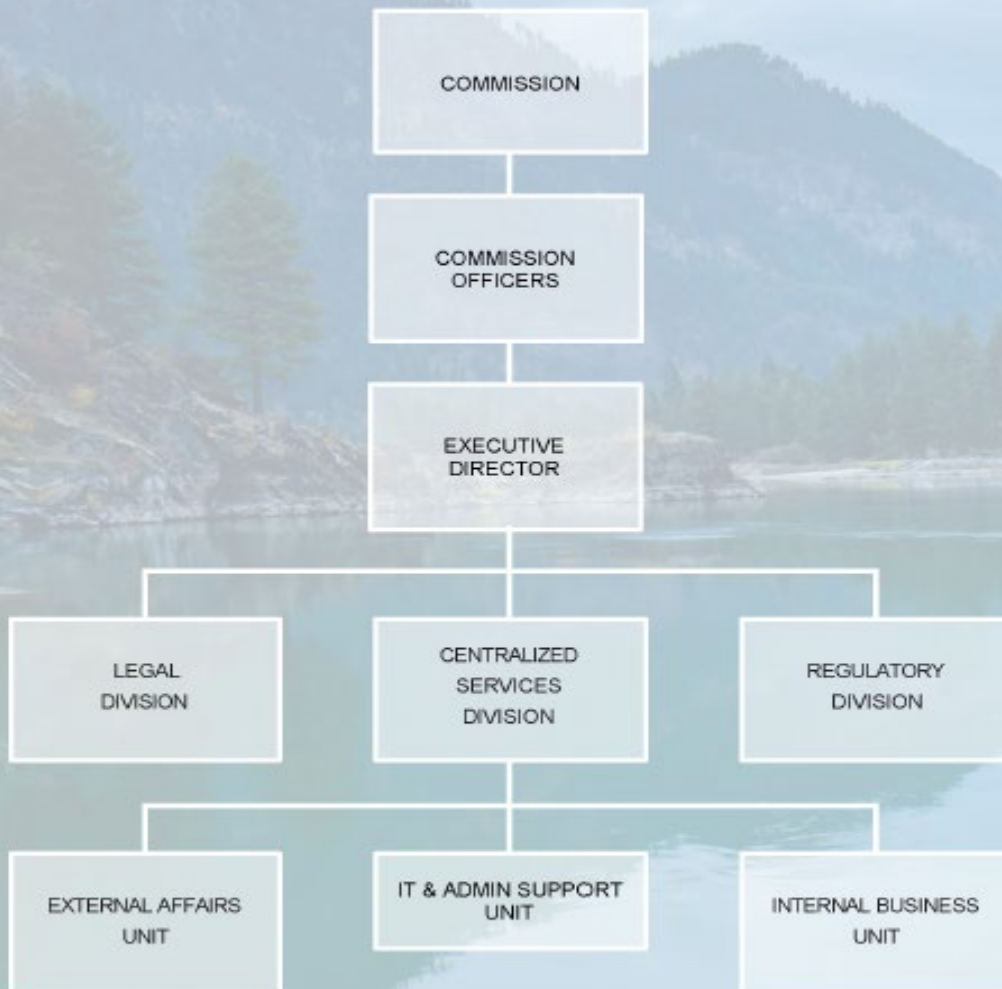
The state's most credible source of information and guidance regarding the industries we regulate.

3. ORGANIZATIONAL STRUCTURE



DEPARTMENT OF PUBLIC SERVICE REGULATION

ORGANIZATIONAL STRUCTURE



Adopted 7-9-2024

4. ORGANIZATIONAL FUNCTION

Commission: The Commission is a deliberative body composed of five Commissioners. When acting as a body and adhering to applicable laws, rules, plans, and policies, the Commission gives effect to the decisions that govern the department and determine the disposition of legal and regulatory matters within its jurisdiction.

Commission Officers: The officers of the Commission are the President, who is the presiding officer pursuant to MCA 69-1-107; and the Vice President. The officers are selected by the Commission from its membership at the Commission's first business meeting of each year after a general election.

Executive Director: The Executive Director is the Chief Administrative Officer of the department and serves as its Chief of Staff and the administrator of the Centralized Services Division. The Executive Director supervises management staff and is ultimately responsible for the performance of all staff across all divisions. The Executive Director works closely with Commission officers on all matters under his/her charge and is supervised by the President.

Legal Division: The Legal Division facilitates the Commission's legal and quasi-judicial proceedings and provides legal counsel to the Commission, and divisions, in matters requiring legal representation, interpretation, or opinion. Its activities include managing dockets before the Commission and related document intake and distribution; drafting Commission notices, orders, and decisions; drafting, revising, and managing administrative rules; conducting legal research; and acting as hearing officers for the agency.

Regulatory Division: The Regulatory Division conducts financial, economic, and technical analyses of the operations of regulated public utilities and common carriers; administers tariffs; performs railroad and pipeline safety inspections; monitors compliance; manages enforcement; assists consumers of regulated services; drafts and implements Commission rules, orders, and other directives; administers applications for operating authority; participates in regional market and transmission forums; assists with developing and modifying regulations and policies; and advises the Commission regarding all of these matters.

Utility Rate Analysts: This team of economic, accounting, financial, engineering, and business analysts contributes to public policy analysis, evaluates costs for utility services, analyzes utility long-range investment plans, develops rate design recommendations, audits utility operating costs and revenue requirements, and monitors performance of regulated entities.

Pipeline Inspectors: This unit performs safety inspections on intrastate natural gas lines and storage facilities.

Railway Inspectors: Specialists in mechanical, track, and operating-practices disciplines inspect locomotives, freight cars, track infrastructure, and related equipment for compliance with safety requirements. They also evaluate the operating practices of engineers, conductors, and switchmen to ensure compliance with federal regulations.

Compliance Specialists: This group assists consumers with questions or complaints regarding regulated entities, administers applications from regulated motor carriers, telecommunications carriers and water and sewer companies, and monitors service outages and billing changes. This group also

coordinates with other units, such as External Affairs, to provide timely updates to the website and social media outlets, as well as supporting the agency on branding, messaging, and community outreach.

Centralized Services: The Centralized Services Division (CSD) provides essential operational support and guidance to the entire agency, ensuring smooth and efficient internal functions. CSD staff manage key areas including accounting, budgeting, and payroll; human resources; contract management and procurement; information technology; executive and agency support; facilities and inventory; and records retention. This division plays a mission-critical role in enabling the agency to fulfill its regulatory responsibilities effectively.

IT and Admin Support Unit: This unit oversees administrative operations, technology systems, reception, and office resources while managing mail, purchasing, travel, and meeting facilitation. It prepares and distributes Commission agendas and records, provides individualized support to Commissioners, and ensures compliance with furnishings, equipment, and recordkeeping requirements.

External Affairs Unit: This unit is responsible for coordinating the department's public policy tracking and analysis, governmental affairs, public meeting notices and other external communications, media relations, public involvement, and consumer relations activities. The unit manages the department's public information content, including coordinating with Compliance Specialists for updates to the website, social media, branding, messaging, and community outreach.

Internal Business Unit: This unit is responsible for the department's budget, accounting, procurement, revenue collection, and related reporting; facility maintenance and workplace safety; human resources; and payroll processing.



5. DEPARTMENT PRIORITIES

Ensure Safe, Reliable, and Affordable Utility Services

(All Divisions)

- The PSC's core mission is to regulate investor-owned utilities to ensure that services are:
 - Reliable – uninterrupted and well-maintained
 - Fair – rates are fair to consumers
 - Safe – services and infrastructure comply with safety standards
- The Commission must balance ratepayer protections with utility financial health, ensuring that:
 - Consumers receive fair rates
 - Utilities are solvent and able to invest in infrastructure

Staff Performance and Development

(All Divisions)

- The agency prioritizes effective leadership, oversight and investment in staff:
 - The Executive Director supervises all staff, ensuring accountability
 - Staff receive support for professional responsibilities, training, and development
 - Offer competitive pay and benefits to attract top talent and support long-term employee retention

Transparency, Public Involvement, Accountability

(External Affairs, IT/Admin Support, Internal Business)

- The PSC emphasizes transparent operations and public trust, achieved through:
 - Open Commission meetings, expansive public comment opportunities, and clear public notices
 - Accessible consumer complaint and inquiry processes associated with regulated companies
 - Comprehensive documentation and records retention

Operational Efficiency and Internal Support

(Centralized Services, IT/Admin Support, Internal Business)

- Internal support systems enable effective regulation, with priorities including:
 - Consistently review and update Internal Policy Manual and Risk Assessments
 - Technology and administrative support
 - Robust budget, procurement, and HR systems

Legal and Regulatory Integrity

(Legal and Regulatory Division)

- Maintaining a strong legal and procedural foundation is key:
 - Timely and accurate legal filings and rulemaking
 - Adherence to statutory authority, due process and a biennial review of administrative rules

Infrastructure and Safety Oversight

(Regulatory Division)

- Ensuring safety in public infrastructure through:
 - Pipeline and railroad safety inspections
 - Monitoring of outages and compliance enforcement

Interagency and Public Communications

(External Affairs)

- Clear, coordinated external messaging and public policy engagement:
 - Monitoring and communicating legislative and policy developments
 - Media relations, department press releases, social media posts, and website maintenance

Strengthen Intergovernmental and External Relations

(External Affairs)

- Build and maintain respectful, collaborative relationships with the Legislative and Executive branches
- Work cooperatively with legislative committees, the Governor's Energy Office, other key agencies and regional groups

6. DEPARTMENT INITIATIVES AND GOALS



LEGAL DIVISION GOALS

1. Reduce Time to Complete Intermediate, Procedural Tasks by 10%

Target (FY2027): Median calendar days to complete intermediate procedural tasks is at least 10% below the FY2026 median.

Tasks:

- ✓ Assign high-volume procedural tasks, like drafting initial notices, procedural orders, and protective orders, to support staff
- ✓ Create docket procedure checklists to clearly delegate tasks between paralegal and staff attorneys

Resources:

- Paralegal
- Temporary legal assistant
- REDDI

2. Reduce Time to Resolve Public Information Requests by 10%

Target (FY2027): Median days to resolve a public-information request is at least 10% below the FY2026 median.

Tasks:

- ✓ Develop and refine public information request procedure checklist
- ✓ Assign support staff to update the tracking sheet when requests are received or closed
- ✓ Plan realistic timelines and staff assignments for processing requests
- ✓ Conduct agency-wide training on obligations in responding to records requests
- ✓ Acknowledge, and log in to the tracking sheet, all public information requests within five business days

Resources:

- Temporary records request paralegal
- Information technology staff
- Regulatory compliance staff

3. Reduce Time to Issue Orders on Reconsideration by 25%

Target (FY2027): Average time to issue Orders on Reconsideration is at least 25% below the FY2026 average.

Tasks:

- ✓ Establish new legal division docket and task tracking matrix
- ✓ Aim to finalize draft reconsideration orders within 90-120 days of receipt of a final order reconsideration request

Resources:

- Legal and regulatory division staff
- Human resources officer
- Fully staffed legal team

4. Build and maintain a resilient, fully-staffed legal team

Target (FY2027): Median legal division vacancy rate is improved by 20% compared to FY2026.

Tasks:

- ✓ Develop career ladders
- ✓ Improve recruitment and retention
- ✓ Improve onboarding
- ✓ Assign mentors and provide opportunities for leadership and growth; implement a cross-training plan
- ✓ Advance legal and regulatory staff to career-ladder level 2 or higher within three years of hire.

Resources:

- Increased funding for staffing and training
- Request: staff training and development funding sufficient to support the career-ladder target
- Human resources officer
- Fully staffed legal team

5. Complete Outstanding High-Priority Rulemakings

Target (FY2027): Every high-priority rulemaking is classified and scheduled before the 2027 legislative session convenes.

Tasks:

- ✓ In coordination with the regulatory division, classify high, medium, and low-priority rulemakings
- ✓ Plan realistic timelines and staff assignments for processing high-priority rulemakings
- ✓ Develop and refine rulemaking procedure checklist
- ✓ Modify default options on rulemaking platform to fit unique department needs
- ✓ Complete all legislatively required rulemaking prior to the beginning of each legislative session.
- ✓ Explore tracking rulemaking dates in REDDI, in the particular docket for each rulemaking

Resources:

- Legal and regulatory division staff
- ACT
- REDDI System Administrator

6. Improve Contested-Case Commission Briefing

Target (FY2027): A staff memorandum and an opportunity for in-person briefing are offered to every Commissioner reasonably in advance of all Commission work sessions and hearings.

Tasks:

- ✓ Improve and develop trainings for staff and new and existing Commissioners to encourage effective participation in work sessions and business meetings

Resources:

- Legal Division
- Regulatory Division
- Executive Director

- Commission Secretary



CENTRALIZED SERVICES DIVISION GOALS

1. Prepare Weekly Business Meeting Items Accurately and On Time

Target (FY2027): 100% of weekly agendas and work-session materials are posted by the published deadline; no business meeting starts without complete Commissioner binders.

Tasks:

- ✓ Send weekly reminder emails to staff and Commissioners regarding submission deadlines
- ✓ Collect work session request forms and follow up on missing documentation
- ✓ Post agenda and work session materials for public access
- ✓ Prepare binders with weekly materials for Commissioners and Executive Staff
- ✓ Coordinate IT support and video streaming as needed

Resources:

- Information technology staff
- Commission Secretary and Assistant Commission Secretary

2. Conduct Quarterly Commission-Wide Trainings

Target (FY2027): Four Commission-wide trainings are delivered; attendance is logged for at least 90% of staff and commissioners at each session.

Tasks:

- ✓ Develop an annual training plan that includes ad-hoc and recurring sessions
- ✓ Schedule trainers and subject matter experts
- ✓ Advertise training topics and schedules to staff and Commissioners

Resources:

- Budget for external training materials
- Information technology staff
- Commission Secretary and Assistant Commission Secretary

3. Resolve All Findings from Previous Audit Within One Year

Target (FY2027): Named 2025 open findings are closed or advanced: (a) IPM/Code acknowledgements at 100%; (b) revised FY2027 DOR fee methodology in use and mid-year DOR review complete; (c) Commission decision on management classification recorded; (d) 2027 pay-plan decision package drafted.

Tasks:

- ✓ Review all findings from the previous audit
- ✓ Consult with auditors for clarification or guidance, as needed
- ✓ Identify required resolutions and create a detailed timeline for implementation

Resources:

- Executive Director
- Agency Coordinating Team (“ACT”)

4. Complete All Job Postings Within 30 Days & Fill Positions Within 90 Days

Target (FY2027): 100% of job postings are posted within 30 days of an approved request; 90% of vacancies are filled within 90 days of posting, or a market exception is documented.

Tasks:

- ✓ Streamline process for recruitment
- ✓ Collaborate with Human Resources Officer and Executive Director to develop or revise job descriptions
- ✓ Define application requirements and determine appropriate salary ranges
- ✓ Obtain approval of salary ranges from the Commission President
- ✓ Post job openings on state website and job boards
- ✓ Enhance staff recruitment, screening, and selection processes
- ✓ Coordinate with selection committee to review applications and schedule interviews
- ✓ Prepare and issue job offer letters
- ✓ Strengthen onboarding for new hires

Resources:

- Human Resources Officer
- Hiring Manager and Selection Committee
- SOMRS/SABHRS
- Access to job boards
- Job Recruitment Request form

5. Maintain Sufficient Staffing Levels

Target (FY2027): Agency vacancy rate is 10% or less at year-end; each class below the current DOA market midpoint is listed with a FY2027 or 2028 remedy; a written succession plan is adopted.

Tasks:

- ✓ Provide competitive pay and benefits
- ✓ Maintain up-to-date Staffing Plan and Priorities
- ✓ Employ measurable and meaningful performance management standards, training, and retention and succession planning
- ✓ Update vacancy forecasts and Staffing Plan at least quarterly
- ✓ Adopt a written Retention Program and Succession Plan
- ✓ Track workloads and schedules by unit so vacancies and overtime by unit are visible to Management

Resources:

- Executive Director
- Human Resources Officer
- Commission Leadership
- Request: waiver of Vacancy Savings Requirement
- Request: HR management software funding
- Request: office-space renovation budget to maintain a functional hearing room and workplace

6. Update Human Resources Process and Internal Controls

Target (FY2027): HR desk manual is adopted; a mid-year desk audit finds 100% of sampled IPM HR policies compliant or corrected within 30 days.

Tasks:

- ✓ Create human resources desk manual with clear checklists for internal processes
- ✓ Update and maintain filing systems to be compliant with state and federal regulations
- ✓ Ensure all documentation is preserved according to state retention requirements
- ✓ Ensure all Internal Policy Manual (“IPM”) policies are implemented and followed
- ✓ Perform Desk Audits and Classification Updates
- ✓ Maintain regular staff check-ins and provide resources and guidance as needed

Resources:

- Executive Director
- Human Resources Officer
- IPM
- SOMRS/SABHRS knowledge and resources
- LinkedIn Learning
- Department of Administration human resources personnel
- E-Verify

7. Ensure All Managers Complete Annual Performance Evaluations

Target (FY2027): 100% of managers complete annual evaluations by the published deadline; 100% of staff have at least one documented professional-development activity in FY2027.

Tasks:

- ✓ Communicate performance evaluation deadlines and expectations to all managers
- ✓ Review submitted evaluations and provide feedback for improvement
- ✓ Plan at least one professional development or training session per staff member annually

Resources:

- Executive Director
- Human Resources Officer
- Commission Leadership
- Budget for training materials and opportunities

8. Meet All Budget Preparation, Execution, and Submission Deadlines

Target (FY2027): 100% of Governor’s Budget Office (OBPP) submission deadlines are met; zero late SABHRS period closes are caused by DPSR.

Tasks:

- ✓ Review Governor’s Budget Office (OBPP) Timeline when published
- ✓ Track, report, and provide fiscal information to management and leadership team per agency policies
- ✓ Leadership team provides feedback prior to OBPP deadlines
- ✓ Follow internal and state policies

Resources:

- Executive Director

- Fiscal Staff
- Access to SABHRS, IBARS and other budgeting tools
- IPM
- Relevant State policies

9. Operate a Robust Safety Committee

Target (FY2027): Four Safety Committee meetings are held; one agency-wide safety and security training is delivered with at least 90% attendance.

Tasks:

- ✓ Conduct quarterly Safety Committee meetings
- ✓ Provide at least one annual safety and security training for Commissioners and staff

Resources:

- Executive Director
- Human Resources Officer
- Safety committee members
- Budget for training materials and opportunities

10. Perform Annual Risk Assessments

Target (FY2027): The FY2027 risk assessment is completed, signed by the Risk Assessment Team, and distributed to the Commission and ACT.

Tasks:

- ✓ Fiscal staff to prepare an annual risk assessment
- ✓ Risk Assessment Team to prepare risk responses and sign offs
- ✓ Distribute the signed assessment to the full Commission and ACT

Resources:

- Executive Director
- Fiscal Staff
- Regulatory CPA
- Commission Leadership

11. Review and Update IPM

Target (FY2027): A comprehensive IPM review is completed; all substantive updates are approved through IPM procedures.

Tasks:

- ✓ Perform a comprehensive review of the IPM, at least annually, ensuring policies are responsive to strategic plan, audit recommendations, and risk assessment
- ✓ Obtain approval for substantive updates through the procedures outlined in the IPM

Resources:

- Executive Director
- ACT
- Commission
- Strategic Plan
- Audit Report

- Risk Assessment

12. External Affairs Coordination

Target (FY2027): Educational one-pagers on every major regulatory docket are completed; Press statements are issued in conjunction with each major decision; a legislative/federal monitoring log is circulated at least monthly; 100% of qualifying outages and incidents are noticed within the published standard.

Tasks:

- ✓ Create a work plan to meet goals and objectives
- ✓ Build working relationships with legislative and executive branches
- ✓ Provide meaningful public information and opportunities for public comment
- ✓ Improve public education on key regulatory matters and processes through press releases on Commission actions and one-pagers on major dockets and commission processes of public interest
- ✓ Circulate a monthly legislative and federal-rulemaking monitoring log to the Commission and ACT
- ✓ Issue timely public notices of regulated-utility outages and incidents, coordinated with Compliance Specialists
- ✓ Publish plain-language reports on PSC-related regulatory issues, trends, and advisories
- ✓ Support site visits, public field hearings, and public listening sessions in coordination with Legal and Regulatory

Resources:

- External Affairs Coordinator
- Regulatory Compliance staff
- ACT
- Commission Leadership
- Executive Director
- Request: out-of-state travel for regional and national forums

13. Complete Commissioner Role Definition and Performance System

Target (FY2027): Commissioner job descriptions, the performance matrix, and related IPM amendments are completed; one leadership-training series is delivered.

Tasks:

- ✓ Draft Commissioner job descriptions distilled from Title 69, ARM 38.1.101, and the Internal Policy Manual
- ✓ Adopt Commissioner duties, the performance matrix, and training requirements into the IPM; propose corresponding legislative requirements
- ✓ Deliver training sequence for Commissioners (job duties, IPM, procedural rules – exparte, bias, hearings, deliberations)

Resources:

- Commission Leadership
- Human Resources Officer
- Internal Policy Manual
- Budget for training materials and opportunities

14. Strengthen Fiscal Audit Coverage and Internal Backup

Target (FY2027): *A written multi-layer audit-recommendation tracker is in use; each core fiscal function has a named backup; audit documentation is organized in advance of each audit; a Business Manager options paper reaches the Commission.*

Tasks:

- ✓ Create a multi-layer system so audit recommendations and compliance measures are tracked through Commission Leadership, management, and classified staff until implemented
- ✓ Proactively anticipate and assemble audit-responsive documents prior to each audit
- ✓ Cross-train at least one backup for each core Centralized Services fiscal function
- ✓ Complete a written options paper on restructuring the Business Manager position to segregate HR, fiscal, and facilities duties, and bring a recommendation to the Commission
- ✓ Cross-train Commission Secretary, Consumer Assistance, and document-processing staff and verify backup coverage quarterly

Resources:

- Executive Director
- Fiscal staff
- Regulatory CPA
- Human Resources Officer
- ACT

15. Finish Agency Records Standards

Target (FY2027): *Electronic (REDDI) and hard-copy/S-Drive records standards are issued; staff are trained.*

Tasks:

- ✓ Issue Secretary of State consistent standards for naming, filing, retaining, and archiving electronic records
- ✓ Issue the companion standard for hard-copy records and S-Drive folders, files, and documents.
- ✓ Train staff on both the electronic and paper standards.

Resources:

- Information technology staff
- Legal Division
- Commission Secretary
- Secretary of State / State Archivist guidance
- REDDI

16. Complete Cost and Revenue Analysis

Target (FY2027): *An expenditure-to-funding map is completed; any notable disparity finding is delivered to the Commission before the next budget submission; proposed legislation is prepared if needed.*

Tasks:

- ✓ Track how agency resources are expended compared with the correlating sources of agency revenue
- ✓ Determine whether any ratepayer class is subsidizing agency services that should be funded by other means
- ✓ Develop any warranted legislative proposal for statutory fee-structure revisions.

Resources:

- Executive Director
- Fiscal staff
- Regulatory CPA
- External Affairs Coordinator
- SABHRS / IBARS



REGULATORY DIVISION GOALS



Utility Analysts:

1. Gain Expertise in Cost-of-Service Model

Target (FY2027): All assigned analysts complete subject-matter sessions and at least one hands-on cost-of-service model exercise (~100 hours total).

Tasks:

- ✓ Schedule sessions with utility subject matter experts
- ✓ Hands-on practice by rate analysts

Resources:

- ~100 hours across four analysts

2. Increase Engagement in Regional Electric Transmission Forum

Target (FY2027): Staff monitor 100% of scheduled regional transmission forums that affect Montana; a written readout reaches commissioners within 10 business days of each forum attended.

Tasks:

- ✓ Monitor and participate in forums involving state regulatory commissions
- ✓ Assist commissioners representing Montana in regional forums
- ✓ Pursue professional development opportunities on transmission issues
- ✓ Engage and coordinate with other relevant Montana state agencies

Resources:

- ~400 hours across two analysts
- Request: out-of-state travel for regional and national transmission forums

3. Monitor Wildfire Risk Mitigation Planning & Compliance

Target (FY2027): Annual utility wildfire-mitigation reports are reviewed within 60 days; DNRC and DES recommendations are received; staff assesses need for rulemaking and legislation.

Tasks:

- ✓ Evaluate annual wildfire risk mitigation reports from utilities
- ✓ Establish communication protocol with DNRC and DES to receive recommendations
- ✓ Evaluate need for administrative rulemaking and/or legislative revisions
- ✓ Engage with peer utility commissions and share experiences

- ✓ Monitor emerging industry standards/best practices

Resources:

- ~300 hours across three analysts

4. Adopt Rules (HB 55 & SB 301)

Target (FY2027): Informal SB 301 rulemaking is initiated; proposed rules are developed in FY2027; the HB 55 independent-evaluator list process is opened in FY2027.

Tasks:

- ✓ Initiate informal rulemaking on SB 301 (Transmission Certificate of Public Convenience and Necessity)
- ✓ Develop proposed rules
- ✓ Initiate formal rulemaking
- ✓ Initiate public process to develop list of qualified independent evaluators under HB 55

Resources:

- ~500 hours across three analysts

5. Modernize Filing/Interim Rate Rules

Target (FY2027): Informal rulemaking is initiated; proposed rules are developed in FY2027.

Tasks:

- ✓ Initiate informal rulemaking
- ✓ Develop proposed rules
- ✓ Initiate formal rulemaking

Resources:

- ~250 hours across two to three analysts

6. Process & Advise on Rate Applications

Target (FY2027): A staff fact sheet and recommendation are filed before each work session on 100% of rate applications received in FY2027.

Tasks:

- ✓ Anticipate incoming applications
- ✓ Assemble and organize staff teams
- ✓ Analyze docket information and scope key issues
- ✓ Prepare discovery/hearing questions
- ✓ Prepare fact sheets, analyses & recommendations
- ✓ Assist with orders

Resources:

- ~10,000 hours across eight analysts

7. Evaluate Artificial Intelligence (“AI”) Efficiencies

Target (FY2027): A written inventory of AI opportunities, efficiency metrics, and draft operating procedures and policy are delivered.

Tasks:

- ✓ Identify potential AI application opportunities
- ✓ Develop efficiency metrics
- ✓ Develop area operating procedures and policy draft

Resources:

- ~500 hours across three analysts

8. Complete Resource Adequacy and Transmission & Distribution (T&D) Efficiency Work

Target (FY2027): The T&D energy-efficiency docket is finished or formally closed; the resource-adequacy investigation docket is advanced.

Tasks:

- ✓ Finish or formally close the investigatory docket on transmission and distribution energy efficiency.
- ✓ Complete the review of regulated utilities' ability to provide reliable capacity to meet customer loads at all hours, including IRP review.
- ✓ Open or advance the Commission resource-adequacy investigation docket covering long-term and short-term adequacy.

Resources:

- Utility rate analysts (hours to be assigned alongside Goals 1–7)
- Legal Division
- External Affairs Coordinator



Pipeline Inspectors:

1. Perform Required Inspection Days

Target (FY2027): 100% of PHMSA-required inspection-days are completed.

Tasks:

- ✓ Complete inspections with protocols & checklist

Resources:

- Pipeline Program Supervisor and Inspectors
- Inspection Assistant program
- Travel resources
- Specialized training

2. Successfully complete USDOT/Pipeline and Hazardous Materials Safety Administration (“PHMSA”) audit

Target (FY2027): The program passes the PHMSA field evaluation and holds certification with no unresolved PHMSA findings at year-end.

Tasks:

- ✓ Pass Field Evaluation
- ✓ Maintain compliance with PHMSA certification

Resources:

- Pipeline Safety Program Manager
- Inspectors/Engineers

3. Continue Data Improvement

Target (FY2027): *Inspection data are used in a quarterly communication and inspection briefing and are documented in ArcGIS or REDDI.*

Tasks:

- ✓ Use data to improve communication & inspections

Resources:

- ArcGIS
- Information technology staff
- Revised Electronic Database for Docket Information (“REDDI”)
- Pipeline Safety Program Manager
- Inspectors/Engineers

4. Integrate Data into REDDI

Target (FY2027): *The pipeline module is live in REDDI for new inspections.*

Tasks:

- ✓ Work with Information Technology staff to implement REDDI for pipelines

Resources:

- REDDI
- Information technology staff
- Pipeline Safety Program Manager
- Inspectors/Engineers



Railway Inspectors:

1. Perform 75 Inspections

Target (FY2027): *At least 75 inspections are completed; an annual data-driven inspection plan is published before second-quarter inspections begin.*

Tasks:

- ✓ Align inspection activities with elevated-risk locations and the Code of Federal Regulations most applicable to emerging safety trends
- ✓ Identify accident cause codes
- ✓ Monitor inspection data for safety impact

Resources:

- SECURE data
- American Industrial Railroad Society and Total Operations Processing System access
- Specialized training

2. Participate in 5 joint Federal Railway Administration (“FRA”) Audits

Target (FY2027): *Inspectors are assigned to five joint FRA audits in FY2027.*

Tasks:

- ✓ Assign inspectors to FRA peers for audits
- ✓ Use trends & data to target enforcement of state and federal regulations

Resources:

- FRA Safety Reports
- Oversight via observations

3. Collaborate with Association of State Rail Safety Manager (“ASRSM”) & FRA

Target (FY2027): Staff attend 12 monthly ASRSM/FRA calls and four quarterly FRA specialist calls; the State Managers’ Report is filed on time.

Tasks:

- ✓ Monthly calls with ASRSM and FRA
- ✓ Quarterly calls with FRA specialists

Resources:

- ASRSM and FRA collaboration
- State Managers’ Report

4. Complete Railway Program Build-Out

Target (FY2027): Every inspector is FRA-certified or on a dated training plan; the 2016 railroad safety risk assessment is updated; a drone assess/no-go memo is issued; REDDI railway-module scoping is complete.

Tasks:

- ✓ Obtain Federal Railroad Administration certification for every inspector still in training
- ✓ Prepare status report regarding the comprehensive railroad safety risk assessment last completed in 2016
- ✓ Publish an annual data-driven inspection plan that targets the inspections to elevated-risk locations
- ✓ Configure REDDI to manage railway notices, incident records, infractions, fines, and reports
- ✓ Complete a written assess-or-no-go on drone technology for track inspections

Resources:

- Railway Program Supervisor and inspectors
- FRA certification training (provided by FRA)
- Information technology staff / REDDI
- Request: \$8,000 per year equipment allowance (\$4,000 per inspector each biennium)
- Request: DOR adjustment to the State Special Revenue Railroad Assessment for program costs not covered by FRA



Compliance Specialists:

1. Acknowledge Consumer Requests within 24 hours

Target (FY2027): At least 95% of consumer requests are acknowledged within 24 hours, measured monthly in REDDI.

Tasks:

- ✓ Assign time-blocks for coverage, intake, and prioritize

✓ Coordinate with External Affairs so outage and incident notices go out on a defined clock alongside consumer-request acknowledgements.

✓ Monitor response times

Resources:

- Regulatory Compliance staff
- Technology access
- Resource guide
- Weekly meetings
- REDDI

2. Follow-up on Open Consumer Cases Every 8 Business Days

Target (FY2027): At least 95% of open consumer cases receive a documented follow-up at least every 8 business days.

Tasks:

✓ Prioritize workload, ensure reminders set for deadlines

✓ Monitor response times

Resources:

- Regulatory Compliance staff
- Weekly meetings
- REDDI

3. Process Public Comments within 5 Business Days

Target (FY2027): At least 95% of public comments are processed within 5 business days.

Tasks:

✓ Prioritize workload

✓ Monitor response times

Resources:

- Regulatory Compliance staff
- Weekly meetings
- REDDI

4. Process Small Docket Applications

Target (FY2027): 100% of small docket applications are processed utilizing checklists; median calendar days are reported each quarter (Q1 establishes the baseline if none exists).

Tasks:

✓ Prioritize workload, coordinate with regulatory as needed

✓ Monitor response times

✓ Each quarter, track how long the applications take to complete

✓ Report the median value to complete each docket type

Resources:

- Regulatory Compliance staff
- Weekly meetings
- REDDI

- Checklists

5. Process Telecom Registrations within 3 Business Days

Target (FY2027): At least 95% of telecom registrations are processed within 3 business days.

Tasks:

- ✓ Prioritize workload, intake, and divide tasks
- ✓ Monitor response times

Resources:

- Regulatory Compliance staff
- Weekly meetings
- REDDI



Closing Statement

Since its establishment, the Montana Department of Public Service Regulation has carried forward its responsibility to protect the public interest by ensuring that essential industries deliver safe, reliable services at reasonable costs.

The goals and objectives outlined in this Annual Plan reflect the Commission's ongoing commitment to balancing the needs of consumers with the long-term viability of the companies it regulates.

The Commission will report on the progress and accomplishments identified in this plan in the Agency's Annual Performance Report, scheduled for publication in October 2027.

Questions regarding the content of this plan may be directed to PSC Executive Director, Jamey Petersen at jamey.petersen@mt.gov.

