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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Utah Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst

Date: July 14, 2014

Re: In the Matter of Rocky Mountain Power's Service Quality Review Report
Docket No. 13-035-70

Background

On May 1, 2014, PacifiCorp (Company) filed its Service Quality Review Report for the period January through December 2013 (Report). On May 14, 2014, the Commission issued a Notice of Filing, Comment Period and Technical Conference, providing interested parties the opportunity to submit comments on the Company's Report on or before Monday, July 14, 2014. Accordingly, the Office of Consumer Services (Office) submits its initial comments on the Service Quality Review Report.

Discussion

As identified in the Report, the Company has a number of service standards related to both customer guarantees and network performance standards. The Service Quality Review Report was designed as a means for the Company to update the Commission and interested parties on its performance related to those standards and customer guarantees. More recently reliability reporting rules have been adopted in R.746-313. The Company notes that portions of this Report contain elements of both pre and post R.746-313

modifications resulting in some redundancies which the Company expects may be eliminated as the report evolves.

Issues

Worst Performing Circuits

Network Performance Standard 3: Improve Under Performing Circuits. The Company will reduce by 20% the circuit performance indicator (CPI) for a maximum of five underperforming circuits on an annual basis within five years after selection.

On January 24, 2014, the Division of Public Utilities (Division) provided comments to the Commission related to the Company's January 1 through June 30, 2013 Service Quality Review Report. In discussing Network Performance Standard 3, the Division reported that the Company had indicated that it considers a number of factors when selecting the five "worst performing" circuits. Due to this process of consideration the five selected circuits may not in fact be the *worst* performing circuits. The Division further notes that "the parties asked and the Company agreed to include in its next report information about the ten worst performing circuits along with the five circuits it selected for improvement. The Company is to give its reasons for its selection."

The Report does not identify the ten worst performing circuits nor does it indicate the reasoning behind the Company's selection of its five worst performing circuits. However, at the May 30, 2014 technical conference a spread sheet was provided that listed the 2014 worst performing circuits selected for correction and an additional five under the category 2014 worst performing circuits.¹ The spreadsheet contains a range of information including a comment section related to each circuit. The Office notes that for the ten 2014 worst performing circuits, including selected circuits, no comments were provided on the spreadsheet. The Office suggests that this would have been an appropriate place for the Company to state if the selected circuits were, in fact the worst performing, or provide the reasons for its choices.

The Office recommends that in future reports the Company identify the ten worst performing circuits and explain the reasoning for the five circuits selected as previously agreed.

Performance Standard 6

On page 26 of the Report the Company provides its performance on response to Commission Complaints and identifies three categories: 1) respond to Commission complaints within 3 days; 2) respond to Commission complaints regarding service disconnects within 4 hours; and 3) address Commission complaints within 30 days. In all three categories the Company reports that it met its goals. In the May 30, 2014 technical conference the question was asked if the complaints identified were informal or formal. The

¹ The list was more extensive than the 10 circuits pointed out above.

Company was uncertain if they were informal, formal or a combination of both types of complaints.

The Office recommends that in future reports it would be helpful to identify which type(s) of complaint is included in the performance metric.

Correcting Priority "A" Conditions

In Docket 04-035-70, the Company committed to correct distribution priority A conditions on average within 120 days. Although the commitment from that docket expired the Company agreed to continue to report the information as parties found it provided useful information. The Company reports that on a weighted average basis throughout the year its performance is "well below the target average of 120 days". However, on a month to month basis the performance can vary more dramatically. As required the Company lists the five longest outstanding priority A conditions². The days until corrected for these five conditions range from 271 to 313 days.

In the May technical conference the Company reported that at 45 days of an outstanding priority A condition consideration is given to assigning the work to an outside resource if internal resources are not available to take corrective action. It is the Office's view that considering outside resources is appropriate if internal resources are not available or likely to be available within a reasonable time.

Office Final Comments

The contents and format of the report has been modified over the years in an attempt to provide adequate relevant information to the reader without being unduly burdensome to the Company. The Office anticipates that further modifications may be made based upon readers' needs and interests, while maintaining the Commission's reporting requirements.

Once the report is filed the practice has been to hold a technical conference where the Company presents its report and participants are afforded the opportunity to ask questions and suggest modifications to future reports as appropriate. The Company provides personnel with varied backgrounds, thus they are generally able to answer the majority of questions arising at the technical conferences. The Office appreciates the opportunity to participate in these technical conferences and commends the Company for their cooperation in assisting participants to better understand the data provided.

The Office also notes that the Company has consistently been receptive to suggestions for modifying and improving the reports to meet the needs of those reviewing and using them.

Recommendations

² July 10, 2013 Commission correspondence Docket No. 13-035-70.

The Office recommends that the Commission acknowledge the Company's 2013 Utah Service Quality Review Report.

The Office further recommends that in future reports the Company should:

- identify the ten worst performing circuits and explain the reasoning for the five circuits it selects; and
- state if the metric for responding to Commission complaints is based upon complaints classified as informal, formal or a combination.

CC: Chris Parker, Division of Public Utilities
Jeffrey K. Larsen, Rocky Mountain Power