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June 19, 2015

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Attention: Gary Widerburg
Commission Secretary

Re: Docket 08-035-55
Service Quality Standards –June 2013 Service Quality Review Report
Docket No. 13-035-70,
Rocky Mountain Power’s Service Quality Review Report

On April 30, 2015, in compliance with the Commission’s June 11, 2009 order in Docket 08-035-55 and pursuant to the requirements of Rule R746-313, Rocky Mountain Power submitted its Service Quality Review Report for the period January through December 2014. On June 1, 2015, in response to the Commission’s Action Request of April 30, 2015, the Division of Public Utilities submitted its Action Request Response. Pursuant to the Commission’s Amended Notice of Filing and Comment Period dated May 8, 2015, the Company hereby submits reply comments in response to issues raised by the Division in its Action Request Response.

In its Action Request Response, the Division of Public Utilities states, “the stakeholders advocated that the baselines need to be updated periodically. Consistent with this periodic updating, the Company added the original five-year dataset (2008 – 2012) one more year of data and recalculated the baseline performances.” Using the Company’s recalculated performance bands, the Division then posits that it is appropriate that the higher reliability bands be adopted since performance delivered has been within the better performance band. The Company agrees that the baselines may need to be re-evaluated periodically. What is unclear is how and when these baselines are adjusted, either downward or upward. Performance levels are highly dependent upon a variety of inputs and considerations. For instance, consideration of the linkage between better reliability and investment for reliability should be discussed.

To the extent the Commission wishes to re-evaluate service quality baselines, the Company recommends that a technical conference be convened, and that guidance be provided to proscribe processes required to adjust baselines upward or downward in performance levels.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

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Informal inquiries may be directed to Bob Lively at (801) 220-4052.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation
Enclosures