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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Artie Powell, Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Abdinasir Abdulle, Utility Technical Consultant

Date: June 1, 2020

Re: **Docket No. 20-035-22 (08-035-55 and 13-035-70)**, Acknowledge with Recommendation.

Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (“Division”) recommends that the Public Service Commission (“Commission”) acknowledge (with recommendation) that Rocky Mountain Power’s (“RMP”) January 1 through December 31, 2019 Service Quality Review Report complies with the Commission’s June 11, 2009 Order in Docket No. 08-035-55, December 20, 2016 Order in Docket Nos. 13-035-01 and 15-035-72, and the requirements of Rule R746-313. The Division recommends the Commission establish a work group to review the reliability baseline standards and make recommendations.

Issue

On May 1, 2020, RMP filed with the Commission its annual Service Quality Review Report for January 1 through December 31, 2019. This filing was made in compliance with the Commission’s June 11, 2009 Order in Docket No. 08-035-55, December 20, 2016 Order in Docket No. 13-035-01 and 15-035-72, and the requirements of Rule R746-313. On the same day,

the Commission issued an Action Request directing the Division to review RMP's filing for compliance and to make recommendations and to report back by June 1, 2020. This memorandum represents the Division's comments on RMP's filing.

Discussion

The Division reviewed RMP's January 1 through December 31, 2019 Service Quality Review Report in light of the above Orders and Rule and the Utah Service Quality Review Group Report filed with the Commission on September 13, 2006. The Division noticed that the 2019 System Average Interruption Duration Index (SAIDI) values were consistently below its control zone throughout the year, 2019, indicating an improvement in RMP's service reliability. However, the 2019 Utah System Average Interruption Frequency Index (SAIFI) values were within its control zone indicating that the current levels should be maintained. This was also observed in 2017 and 2018. It seems that the two measures are not in agreement as they are pointing to two different conclusions. The SAIDI values suggest the need to adjust and the SAIFI values suggest that there is no need to adjust the control limits and the notification levels (reliability baselines).

In both 2017 and 2018, the Division recommended acknowledgement of the service quality review reports and indicated that it will keep monitoring the trend of the reliability performance. In this instance, the Division recommends the Commission establish a work group to review the reliability baselines and make recommendations. The current reliability performance standard was established by the Commission on December 20, 2016 in Docket Nos. 13-035-01 and 15-035-72.

Conclusion

The Division has determined that RMP is generally in compliance and recommends that the Commission acknowledge, with recommendation, RMP's January 1 through December 31, 2019 Service Quality Review Report. The Division commends RMP on its cooperative work on the issues of service quality and developing a meaningful report. The Division recommends the Commission establish a work group to review the reliability baseline standards and make recommendations.