

Complainant's response to information given from RMP

PSC question 1. Does flicker problem persist and if so, to what extent?

The flicker in our home is noticeable and bothersome on a daily basis. The flicker is not constant. Sometimes there will be hours of quality light and then it will stretch for hours of flickering. My wife and I have noticed no obvious improvement in reducing either the frequency or severity of the flicker over the summer since Rocky Mountain Power states there has been substantial improvement.

PSC question 2. Do we wish to continue complaint? If so, identify what relief we hope to obtain from PSC.

We do wish to continue the complaint. Allow me to briefly explain a few concerns with the information provided by RMP before discussing what relief is sought from the PSC.

They state, "Rocky Mountain Power considers light flicker to be problematic if the magnitude of P1st is above 1.0 for greater than 1% of a measuring period." The measurement criteria is the percentage of time P1st is over 1, not the average of the readings over the testing period. In the results from the reading on October of 2019 it was reported that the P1st flicker was in excess of 1 for 51% of the reading for an average of 1.75. In the recent August 2020 reading it was reported that the average was 1.03 but it was not reported what percentage of time the readings were above 1. It is encouraging that the average value reduced but it still **averaged** above 1 where flicker is visible to human eyes. What percentage of the time was it above 1? By their own definition they are still averaging above the problematic level and not surprisingly RMP fails to mention what percentage of the time the latest test was above 1%. Also, this testing was only a 6 day sample. [REDACTED] may have had a reduced usage load either by design or by happen stance during this short time.

We read, "Rocky Mountain Power strives to maintain excellent service to all customers, and it recognizes that a level of flicker could be so severe as to make service inadequate under § 54-4-7. Along these lines, Rocky Mountain Power maintains that compliance with the IEEE recommended level would conclusively show that service is adequate. If the IEEE recommended flicker level is exceeded, this might show that service is inadequate, depending, however, on the circumstances of a particular issue."

What are the circumstances of this particular issue that make the flicker levels not indicate inadequate service? If RMP admits flicker could be severe enough to make service inadequate and that compliance with IEEE recommended levels would show adequate service, can we not imply that above those standards is inadequate? Even casting the recent results into their best light they still average above recommended standards.

It would be great if sustained levels under IEEE guidelines can be achieved with economically efficient measures; however, it appears the only circumstance that makes this situation not constitute severely impaired service is the potential cost to make the needed repairs.

We are not the only household in the area having problems. As they stated, "Other customers in the area have expressed concern with flicker." There are likely many other households who don't know the cause of their lights flickering or don't know about the PSC being the governing body who could possibly oversee correction of the problem which has stretched on for years.

With no other commercially available options for power available in our area, I am requesting the PSC to stay involved in oversight of the correction of this problem. As "Rocky Mountain Power considers light flicker to be problematic if the magnitude of P1st is above 1.0 for greater than 1% of a measuring period" I ask that the PSC set a reasonable date for RMP to show multiple testing periods in our area that adhere to this standard. If this is not accomplished by the assigned date through economical measures then I ask that the PSC consider the situation as one that constitutes severely impaired service and intervene in whichever way necessary to ensure a consistent quality power supply.

PSC question 3. Do we request a hearing in this docket?

I do not see how a hearing would bring to light more information needed to make a ruling than has already been provided. Rocky Mountain Power reluctantly revealed there is a problem in the area and showed that the problem persists with the recent testing. They have identified the cause of the problem being the "Large customer". With these items already known I don't believe a hearing necessary, but if this is the only way to achieve the above stated requests then I would like to pursue this.

Scott Macdonald