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October 25, 2012

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

Attn: Gary Widerburg
Commission Secretary

RE: Docket No. 12-035-93 - Rocky Mountain Power Major Event Report

On August 30, 2012, Rocky Mountain Power requested major event exclusion for the weather-related events of July 13, 2012. On October 15, 2012, the Division of Public Utilities filed comments recommending approval of the major event exclusion. In its recommendation, however, the Division recommended that the minutes lost for the Little Mountain #18 (LMT18) circuit pole fire not be included as part of this major event. Rocky Mountain Power takes this opportunity to respond to the Division's recommendation.

The basis for the Division's recommendation to exclude the Little Mountain event is because Little Mountain is geographically distant from the primary outage areas, and the pole fire event appears to be coincidental to the storm that caused major outages. The Division further reasons that excluding it would have no material effect on the major event determination calculations. The Company objects to this arbitrary distinction of interruption events and finds that the Division's recommendation would violate the major event standard contained in IEEE 1366-2003.

The Company uses daily state SAIDI data to evaluate when major events have occurred. Consistent with the definition of establishing a major event threshold, all interruptions that occur within that time period are considered part of the major event, since the existence of a day whose reliability exceeds the threshold requires that it be treated as a major event. This may include interruptions which are not necessarily proximate to the majority of the interruption activity, but as long as the basis for the threshold used the entire state performance, it is appropriate and necessary to apply the threshold against the state's day's performance. The development of IEEE 1366-2003 attempted to remove the subjectivity of "exceeding design or operational limits" as well as looking toward selecting and de-selecting specific interruptions. It replaced the subjective criteria with very objective criteria. No modifications to the major event definition or calculations for the elimination of any specific interruptions from a major event have been advocated by any routine user of this particular IEEE standard.

Finally, it is important to note that whenever a major event occurs there can be a cascading of impacts well beyond the area in which the event occurred due to the shifting of resources to help

“dig out” from the major event. Thus, impacts to crew resources, materials and customers, can still occur well beyond the operating districts that were primarily involved.

If you require further information regarding this major event report or the Company’s response to the Division’s recommendations, please contact Heide Caswell, Director Engineering, at (503) 813-6216.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation & Government Affairs

Enclosure