



State of Utah  
Department of Commerce  
Division of Public Utilities

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## ACTION REQUEST RESPONSE

**To:** Utah Public Service Commission

**From:** Division of Public Utilities  
Chris Parker, Director  
Energy Section  
Artie Powell, Manager  
Abdinasir M. Abdulle, Technical Consultant

**Date:** May 31, 2013

**Re:** **Conditionally Acknowledge** RMP's 2012 Service Quality Report Docket Number 13-035-70, Rocky Mountain Power's Service Quality Review Report for January 1 – December 31, 2012. In the Matter of Rocky Mountain Power's Service Quality Review Report.

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## RECOMMENDATION (Conditional Acknowledgement)

The Division of Public Utilities ("Division") recommends that the Public Service Commission ("Commission") conditionally acknowledge that Rocky Mountain Power's ("Company") 2012 Service Quality Review annual report complies with the Commission's June 11, 2009 Order in Docket No. 08-035-55 and Rule R746-313. The Company will provide a supplemental filing containing the information discussed below.

## ISSUE AND DISCUSSION

On May 1, 2013, in compliance with the Commission's June 11, 2009 Order in this Docket and Rule R764-313, the Company filed with the Commission its 2012 Service Quality Review annual report. On May 6, 2013, the Commission issued an Action Request requesting that the Division review for compliance and to make

recommendations. The Commission also asked the Division to report back by May 31, 2013.

The Company's annual report is the result of a collaborative effort. In the past the Company would prepare a draft of the report for review and take comments through written correspondence and in a technical conference where the Company reviewed the draft and answered questions from interested parties. Although the report was not marked as a draft, the Company did file its report on May 1<sup>st</sup> as required and the Commission conducted a technical conference on May 22, 2013 where the Company and parties reviewed the report.

At the May 22<sup>nd</sup> meeting, several issues were raised. First, the Company noted that the table in section 2.8 (Reduce CPI for Worst Performing Circuits by 20%) inadvertently excluded data for CY2012. The Company provided this information at the meeting and will formally provide it in a supplemental filing.

Second, the parties also discussed the difference between the CPI<sub>05</sub> and CPI<sub>99</sub>: the CPI<sub>99</sub> excludes major events and loss of supply or transmission outages. Tables in Section 2.8 report the CPI figures from year one of the program through year 10. In years 1-5 both CPI measures are reported but for years 6-10 only the CPI<sub>05</sub> is reported. The parties requested that the CPI<sub>99</sub> be provided for the later years. The Company agreed to provide this information in a supplemental filing.

Third, the Company and the parties discussed the information on Priority A Conditions in Section 3.3. The information in this section summarizes the Company's commitment to address Priority A Conditions on average within 120 days. The current presentation reflects changes discussed in past reports and is more informative than originally designed. The parties however did request that the Company provide information specifying the three longest outstanding Priority A Conditions. The Company agreed to supply this information in future reports.

Finally, in its memorandum in response to a Commission Action Request regarding the June 2012 Service Quality Review report, dated January 31, 2013, the Division recommended that the Commission hold a Technical Conference to discuss the appropriateness of the use of the average performance of the five worst performing circuits to determine whether or not the improvement goal has been attained. The Commission included this issue as part of the discussion in the May 22<sup>nd</sup> meeting. At that meeting it was agreed that the Company and the Division work together on this issue. The outcome of this collaborative work will be included in the future reports after it is discussed with work group and their comments included.

In conclusion, the Division reviewed the report in light of the requirements of R746-313 and the June 11, 2009 Commission Order in this Docket and the Utah Service Quality Review Group Report filed with the Commission on September 13, 2006. The Division determined that the Company is in compliance and recommends that the Commission acknowledge the Company's 2012 Service Quality Review annual report conditioned on receiving the supplemental filing. The Division commends the Company on its cooperative work on the issues of service quality and developing a meaningful report.

CC: Dave Taylor, RMP  
Michele Beck, OCS