



## State of Utah

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## Public Service Commission

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July 10, 2013

Dave Taylor  
Rocky Mountain Power  
201 South Main, Suite 2300  
Salt Lake City, Utah 84111

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

RE: Docket No. 13-035-70, "In the Matter of Rocky Mountain Power's Service Quality Review Report"

Dear Mr. Taylor:

The Public Service Commission of Utah (Commission) has reviewed Rocky Mountain Power's (Company) Service Quality Review Report (Report) for the time period of January 1 through December 31, 2012, filed on May 1, 2013, and the Utah Division of Public Utilities' (Division) May 31, 2013, memorandum addressing the Report.

In its memorandum the Division summarized the outcome of the May 22, 2013, Service Quality Review Group meeting during which the Report was discussed. First, the Company noted it had inadvertently excluded data for calendar year 2012 from the table in section 2.8 of the Report (Reduce Circuit Performance Indicator ("CPI") for Worst Performing Circuits by 20%) and stated it would provide the information in a supplemental filing. Second, the parties also discussed the difference between the CPI05 and CPI99 and requested the Company provide CPI99 data for years 6 through 10 of the report. The Company also agreed to provide this information in a supplemental filing. Third, the Company and the parties discussed the information on Priority A Conditions presented in Section 3.3 of the Report. At the request of the parties, the Company agreed to provide in future reports information specifying the three longest outstanding Priority A Conditions. Finally, the Company and the Division agreed to further 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 outcome of this collaborative work will be included in the future reports after it is discussed with Service Quality Review Group.

The Division concludes the Company is in compliance with the requirements of newly adopted rule R746-313 "Electric Service Reliability (Rule)," the Commission's June 11, 2009, Order in Docket No. 08-035-55, and the Utah Service Quality Review Group Report filed with the

Commission on September 13, 2006, in Docket No. 04-035-42. As such, the Division recommends the Commission acknowledge the Company's Report conditioned on receiving the supplemental filing. The Company's supplemental filing was provided to the Commission on June 4, 2013.

On June 17, 2013, the International Brotherhood of Electrical Workers Local 57 (Local 57) filed comments responding to the Report and the Division's memorandum. Local 57 recalled the Company would provide information pertaining to the five longest outstanding Priority A Conditions, rather than three as indicated by the Division. As it appears there would be little incremental work for the Company to provide the five longest outstanding Priority A Conditions in future reports, rather than three, the Commission believes Local 57's request is reasonable.

Local 57 also noted the information provided in Section 3.3 of the Report shows a marked but steady decline in the number of Priority A Conditions corrected from January through December. From the discussion at the May 22<sup>nd</sup> meeting, IBEW suggests this decrease appears to be because the number of inspections over the year has decreased, not because the conditions are going away. Local 57 believes it would be helpful for the Company to report: 1) the number of such inspections per month annually; 2) the number of Priority A Conditions identified in such periods; and 3) a description of the applicable preventive maintenance plan cycle, if any. Local 57 maintains this information would put in perspective the cost/benefits of the preventive maintenance program and the extent of such problems being addressed. As other stakeholders may want to provide input on this request, the Commission suggests it should be a topic of discussion at the next scheduled Service Quality Review Group meeting.

As with the Division, the Commission commends the Company on its efforts pertaining to electric service reliability. The Commission has reviewed the Company's and the Division's filings and in general agrees with the Division's conclusion with the following exceptions. While the Company has provided the majority of information required by the Rule, an analysis of the system-wide and reliability reporting area sustained interruption causes compared to the previous four-year performance and a listing of the T<sub>MED</sub> values that will be used for each reliability reporting area for the forthcoming annual reporting period, as required by R746-313-7(b) and 7(f), respectively, appear to be absent from the Report. While this oversight is understandable due to the recent enactment of the Rule, the Commission directs the Company to file the missing information within 60 days of the date of this letter.

The Report is acknowledged as satisfying the applicable requirements subject to the filing of the missing information within 60 days. When the missing information is filed, the report will be considered complete.

Sincerely,

/s/ Gary L. Widerburg  
Commission Secretary

D#245429