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Salt Lake City, Utah 84116

December 1, 2016

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

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

Attention: Gary Widerburg  
Commission Secretary

Re: In the Matter of Rocky Mountain Power's Service Quality Review Report  
Docket No 15-035-72

Pursuant to the Notice of Filing and Comment Period in the above referenced matter dated November 15, 2016, PacifiCorp dba Rocky Mountain Power ("Rocky Mountain Power" or "the Company") submits for filing an original and ten (10) copies of its comments on the November 7, 2016, recommendation of the Division of Public Utilities ("Division") to adjust PacifiCorp's service quality-related System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) control limits.

Rocky Mountain Power has worked with the Commission, its staff, the Division and other stakeholders over the years to align its reliability programs with the interests of its customers to improve service at the best possible cost. Over these years, the Company has demonstrated its effectiveness with prior filings, actual reliability results and technical workshops. The Company works hard to improve service reliability for its customers and expects that work to continue going forward. The Company appreciates working with the DPU, the Commission and stakeholders on a fair process that considers the improvements that have been accomplished, yet is also flexible to account for potential variations that negatively impact future reporting periods.

On September 27, 2016, Rocky Mountain Power participated in a technical workshop regarding reliability baseline indices. The Company and stakeholders recognized that in prior service quality review reports the 365-day rolling performance for SAIDI and SAIFI was at various points in time approaching the lower control limit, suggesting that improvements made by the Company were sustained. Certain parties felt strongly that adjusting these baselines to recognize this change in performance was necessary. While the Company believes no real purpose is served by adjusting the baseline lower (except to potentially penalize the Company if it exceeds the upper threshold), it accepted slight downward adjustment of the reliability baselines and notifications levels for SAIDI and SAIFI as recommended in the Divisions's memorandum dated November 7, 2106. The Company further noted to parties in the technical conference that just as the baseline could be lowered, there might be conditions which would dictate elevating them in the future. The Company further expects any such adjustment would require approval of the Commission.

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Additionally, the Company clarifies that it intends to continue to work with the DPU, the Commission and stakeholders to propose modifications to its Worst Performing Circuit program, as discussed in the Division's memo. It anticipates review by these parties prior to making a filing during the first quarter of 2017 to the Commission on the matter.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred):        [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
   [bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)

By regular mail:                Data Request Response Center  
   PacifiCorp  
   825 NE Multnomah, Suite 2000  
   Portland, Oregon, 97232

Informal questions should be directed to Bob Lively at (801) 220-4052.

Sincerely,



Jeffrey K. Larsen  
Vice President, Regulation

Enclosures

cc:     Division of Public Utilities  
         Office of Consumer Services