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May 24, 2017

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th 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 Commission's April 14, 2017 Scheduling Order and Notice of Technical Conference, the Company provides for filing herein its reply comments in the above referenced matter.

In its comments of May 10, 2017, the Utah Division of Public Utilities ("DPU") recommended as follows:

The Company proposes the Table shown in its filing to replace the Company's current WPC process in its Service Quality Report. The Division reviewed this Table and determined that the last column (Plans Not Meeting Goals not included in metrics) contains incorrect numbers. The numbers in the column should be the difference between the second column (Project Count) and the fourth column (Plans Meeting Goal (>1 year since project completion)). Hence, the Division recommends that the Commission direct the Company make that correction to the proposed Table. The Division also recommends that the last column be distinguished from other columns under the Effectiveness Metrics. (P.4)

Pursuant to subsequent discussion with the DPU and the Utah Office of Consumer Services (OCS), the Company developed and provides herein the following replacement table.

Approval Metrics			Effectiveness Metrics						In Progress
(1) District	(2) Project Count (columns 4+9+10)	(3) Budgeted Cost/CML	(4) Plans Meeting Goals (>1 year since project completion)	(5) Estimated Avoided annual CML	(6) Actual Avoided annual CML	(7) Budgeted Cost per annual avoided CML	(8) Actual Cost per annual avoided CML	(9) Plans Not Meeting Goals (not included in metrics)	(10) Plans waiting for information
American Fork	8	\$1.05	4	207,684	269,466	\$0.59	\$0.15	0	4
Cedar City	2	\$4.76	1	79,853	114,614	\$2.41	\$1.18	1	0
Jordan Valley	17	\$0.60	8	317,521	541,182	\$0.89	\$0.57	1	8
Layton	4	\$0.63	2	30,998	38,747	\$3.15	\$2.38	1	1
Metro	16	\$0.38	10	2,619,725	4,422,054	\$0.34	\$0.19	0	6
Montpelier	1	\$0.75	0	-	-	\$0.00	\$0.00	0	1
Ogden	11	\$0.55	6	386,385	734,114	\$1.14	\$0.54	1	4
Park City	4	\$1.23	1	2,669	5,337	\$41.97	\$12.21	0	3
Price	6	\$0.23	3	127,794	137,091	\$0.67	\$0.94	0	3
Richfield	3	\$1.78	1	349	349	\$28.35	\$17.08	0	2
Smithfield	2	\$1.87	0	-	-	\$0.00	\$0.00	1	1
Tooele	4	\$0.42	3	158,168	236,569	\$1.24	\$0.49	0	1
Tremonton	2	\$3.08	1	58,070	105,495	\$2.58	\$0.59	0	1
Vernal	2	\$5.80	1	246	491	\$109.98	\$0.00	0	1
TOTAL	82	\$0.53	41	3,989,462	6,605,509	\$0.65	\$0.33	5	36

The replacement table addresses the calculational and presentational issues identified by the DPU and further clarifies the status of reliability improvement projects. These improvements to the table are achieved by adding a color distinguished final column entitled (In Progress – Plans waiting for information). Numbers reported in this final column when combined with numbers reported in the ninth column (Plans Not Meeting Goals (not included in metrics)) and numbers reported in the fourth column (Plans Meeting Goals (>1 year since project completion), will correspond to the reported projects in the second column (Project Count). Based on discussion with the DPU and the OCS, both parties agree that the replacement table resolves the calculational and presentational issues raised by the DPU and clarifies the reporting of the status of reliability improvement projects undertaken in the Open Reliability and Reporting (“ORR”) process.

Rocky Mountain Power has worked with the Commission, its staff, the DPU, the OCS, 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. The Company appreciates the collaborative nature with which stakeholders engaged to move forward the manner in which reliability work is conducted at RMP and believes ORR will improve reliability for customers across the service territory, while doing so cost effectively.

The Company respectfully requests that the Commission approve the ORR process, including the table described herein, as a replacement for the current Worst Performing Circuit process.

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

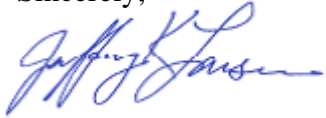
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Informal questions should be directed to Bob Lively at (801) 220-4052.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation

Enclosures

cc: Division of Public Utilities
Office of Consumer Services

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of May 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

<u>Utah Office of Consumer Services</u> Cheryl Murray - cmurray@utah.gov Michele Beck - mbeck@utah.gov	
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