



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, Utility Analyst II
Charles Peterson, Technical Consultant

Date: December 2, 2016

Re: 16-035-45 (08-035-55 and 13-035-70) – Rocky Mountain Power’s January through June 30, 2016 Service Quality Review Report.

RECOMMENDATION

The Division of Public Utilities (“Division”) recommends that the Public Service Commission (“Commission”) acknowledge that Rocky Mountain Power’s (“Company”) January 1 through June 30, 2016 Service Quality Review report complies with the Commission’s June 11, 2009 Order in Docket No. 08-035-55 and Rule R746-313. The Division also recommends the Commission to direct the Company, in future filings, to make the changes outlined below to reflect the agreed updates to the SAIDI and SAIFI baselines.

ISSUE

On November, 2, 2016, in compliance with the Commission’s June 11, 2009 Order in this Docket and Rule R764-313, the Company filed with the Commission its annual Service Quality Review Report for January 1, 2016 through June 30, 2016. On the same day, the

Commission issued an Action Request directing the Division to review the Company's filing for compliance and to report back by December 2, 2016. This memorandum represents the Division's response to the Commission's Action Request.

DISCUSSION

The Company's Service Quality Review Report is the result of a collaborative effort. Historically, the Company prepares a draft of the report for review and takes comments through written correspondence and in a technical conference, where Company reviews the draft and answers questions from interested parties. On November 2, 2016, the Company filed with the Commission its Service Quality Review Report for the period of January 1, 2016 through June 30, 2016 and a replacement of page 17 of the 2015 report.

The Division reviewed the Report for compliance. The Division noticed that the Company prepared the report before the Division filed its Technical Workshop report for the SAIDI and SAIFI baselines. Therefore, the Company's report does not reflect the new SAIDI and SAIFI baseline values. For instance,

1. Network Performance Standards 1 and 2, Improve SAIDI and SAIFI, respectively (page 4), do not reflect the new baseline values.
2. The 2016 Utah SAIDI and SAIFI (excluding prearranged and customer requested) graphs on pages 7 and 8, and the Rolling 365-day SAIDI and SAIFI (major event excluded) graphs (page 18) are using the old control limits instead of the new updated values.

The Division also reviewed the accompanying replacement page (page 7) for the Company's 2015 report. The Division concludes that the errors in page 7 of the Company's 2015 report have been adequately corrected. However, the Division noticed that page 17 of the 2016 semi-annual report contains the same errors as that of 2015 report and needs to be corrected.

On December 1, 2016, the Company filed with the Commission its comments on the Division's November 7, 2016 recommendation of slight downward adjustment of the Company's SAIDI and SAIFI control limits and notification levels. In this filing, the Company accepted the Division's recommendation. The Division notes that no party has filed any comments in opposition to the Division's recommended adjustments to the control limits and notification levels for the SAIDI and SAIFI values.

Therefore, the Division recommends that the Commission direct the Company to, going forward, incorporate these updated baseline and notification values in semi-annual and annual reports.

In conclusion, the Division reviewed the report in light of the requirements of R746-313 and the June 11, 2009 Commission Order in Docket No. 08-035-55, 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 January 1, 2016 through June 30, 2016 Service Quality Review report and direct the Company to correct the errors on page 17. The Division commends the Company on its cooperative work on the issues of service quality and developing a meaningful report.

CC: Bob Lively, RMP
Michele Beck, OCS