



1407 W. North Temple  
Salt Lake City, Utah 84116

January 21, 2021

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attn: Gary Widerburg  
Commission Administrator

Re: **Docket 20-035-22 – In the Matter of Rocky Mountain Power’s Service Quality Review Report**

*Comments on the DPU’s memorandum regarding the technical work group on Rocky Mountain Power’s reliability baseline indices*

On December 21, 2020, the Division of Public Utilities (“DPU”) filed a memorandum (“Memo”) regarding the technical work group on Rocky Mountain Power’s reliability baseline indices. In accordance with the Notice of Filing and Comment Period issued December 22, 2020 by the Public Service Commission of Utah, PacifiCorp d/b/a Rocky Mountain Power (“the Company”) respectfully submits its comments on the DPU’s Memo specifically in response to the section labeled power quality and outage frequency for industrial customers.

Rocky Mountain Power’s current reliability standards were developed and implemented as a way to measure overall reliability performance over the customer base. This provides a balance of costs and reliable service to our customers. As discussed in the Memo, the technical work group on reliability baseline indices (“Group”) has met to discuss the power quality concerns raised by certain industrial customers. The Group will continue to meet to explore power quality and its various impacts on sensitive customers. The Company is in the process of reviewing targeted location and performance information to better identify the focus of the concerns. For instance, if network events render certain customers unable to recover, those improvements might best be focused within those customers’ facilities; however, if those same events substantially impact broader areas of delivery points, improvements could be considered within Rocky Mountain Power’s network. As a result, this investigation is key to understanding any formation of a power quality delivery standard.

Very truly yours,



Joelle Steward

Vice President, Regulation

cc: Service List (Docket No. 20-035-22)

**CERTIFICATE OF SERVICE**

Docket No. 20-035-22

I hereby certify that on January 21, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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