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# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

MARGARET W. BUSSE  
Executive Director

CHRIS PARKER  
Division Director

## Reply Comments

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Artie Powell, Manager  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Bob Davis, Utility Technical Consultant  
Abdinasir Abdulle, Utility Technical Consultant

**Date:** September 29, 2022

**Re:** **Docket No. 22-035-34**, Proposed Reporting for Power Quality. In the matter of Rocky Mountain Power's Request to Establish Reporting for Power Quality.

## Recommendation (Approval with Recommendations)

The Division of Public Utilities (Division) recommends the Public Utilities Commission (Commission) approve Rocky Mountain Power's (RMP) template for its proposed Power Quality Report to be filed annually with the Commission. The Division recommends that RMP continue to meet with Clean Harbors Aragonite and the Utah Petroleum Association to discuss possible solutions to their concerns. The Work Group has accomplished the scope of this docket and therefore the Division recommends the Work Group be dissolved.

## Issue

On July 26, 2022, the Division, Clean Harbors Aragonite, and the Utah Petroleum Association filed comments on RMP's proposed power quality report. On August 29, 2022, the Commission issued a request for reply comments where any interested parties may file reply comments on or before Thursday, September 29, 2022.

Division of Public Utilities

Heber M. Wells Building • 160 East 300 South • P.O. Box 146751 Salt Lake City, UT 84114-6741  
[www.dpu.utah.gov](http://www.dpu.utah.gov) • telephone (801) 530-7622 • toll-free in Utah (877) 874-0904 • fax (801) 530-6512

## Background and Discussion

The Commission issued its request for reply comments on August 29, 2022, as a result of Clean Harbors Aragonite and Utah Petroleum Associations (Industrials) comments. The Industrials recommended that the Division require RMP to be more transparent by:<sup>1</sup>

1. Sharing all root cause analyses for power quality events for any known or reasonably expected events that may affect RMP industrial customers;
2. Invest in additional power quality meters to better track industrial power quality and assist in root cause analysis of events in order to support identification of priority areas for needed maintenance and updates;
3. Include three to five years of backward-looking data in the annual power quality (PQ) Reports, rather than forward-looking only; and
4. File its inspection and maintenance schedules and practices with the Commission in a Docket that enables access to the information for interested or affected parties subject to the Commission's rules governing confidentiality.

Further, the Industrials assert that although power quality issues are technical and electrically based occurrences, ongoing and clear communication is critical towards understanding and action. The Industrials recommend that the Division require RMP to:<sup>2</sup>

5. Formalize communications practices to ensure timely, and where possible, advanced notice of any power quality events;
6. Work with industrial customers to formalize record keeping and tracking of pertinent details of power quality events, to assist in identifying trends, causes, or affected infrastructure;
7. Upon an affected customer's request, designate an engineering team to work with the affected customer's team to conduct site-specific audits and identify feasible solutions; and
8. As part of that site-specific audit, also identify any RMP facilities or assets that may be leading to power quality events, identify those assets to the customer and provide a reasonable action plan to address needed RMP infrastructure improvements.

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<sup>1</sup> See Clean Harbors Aragonite's and the Utah Petroleum Association's Comments, Docket No. 22-035-34, page 6, <https://pscdocs.utah.gov/electric/22docs/2203534/324982CleanHarborsAragoniteUtPetroleumCmnts7-26-2022.pdf>.

<sup>2</sup> *Id.*, page 7.

Finally, the industrials recommend that the Division require RMP to implement Objectives and Implementation Plans by:<sup>3</sup>

9. Presenting proposed remedies to resolve identified issues, with a timeline for implementation;
10. Annually identify proposed proactive measures intended to improve service quality and reliability, with a tracking mechanism to correlate what measures have been done to any improvements (or lack thereof) in power quality year over year; and
11. Annually identify any damaged or ill-functioning equipment, and any equipment approaching the end of its useful life, with a plan and timeline to repair or replace such equipment.

The issues brought forth by the Industrials in the July 26<sup>th</sup> comments are important. However, these requests are moderately outside the overall scope of the power quality reporting, at least from a system-wide reliability performance summary, which is the intent of the report.<sup>4</sup> The issues raised by the Industrials, are certainly relevant to the reporting and metrics used by RMP, but are best-handled separately. This is so in part because the typical metrics are not well-suited to addressing the issues the Industrials raise.

Furthermore, in its comments, the Industrials directed recommendations to the Division, but the Division does not have the statutory authority to grant the relief sought. The Commission should interpret the recommendations as requests directed to the Commission.

The Industrials have consistently raised issues concerning reliability and the related effects on their environmental compliance and the public interest does include air quality considerations. While discussing these issues between parties in the recent past, it is clear that a new type of reliability metrics and reporting would be required to address the Industrials' concerns. It is in the public interest to have measures able to identify any power quality issues but it is no small undertaking and is one the Division lacks the resources to independently undertake. As with any program aimed at narrower sets of customers, it would be important to confine the reach and expense of any such programs to the benefiting group of customers. The Division does not have any specific recommendations

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<sup>3</sup> Id., page 8.

<sup>4</sup> See Utah Division of Public Utilities Comments, Docket No. 22-035-34, July 26, 2022, <https://pscdocs.utah.gov/electric/22docs/2203534/324781CmntsDPU7-26-2022.pdf>.

but is open to further discussion to resolve these issues. The availability of relevant data, or its development, will be key to understanding and resolving any outstanding issues. The Division recommends that the Commission direct RMP to continue discussions with the Industrials on these specific issues and approve the overall Power Quality Report proposal as filed by RMP on June 27, 2022. The Division expects RMP will provide reply comments directed at the specific requests. Depending on the extent and nature of the considerations it raises, the Commission may wish to require some periodic summary of efforts and progress.

As ordered by the Commission in Docket No. 20-035-22, the Work Group examined RMP's reliability baseline standards and made recommendations.<sup>5</sup> The Work Group has accomplished this task as assigned. Therefore, the Division recommends the Work Group be dissolved as no further action is needed with the approval of RMP's proposed reporting template. The effort to address the Industrials' comments should be done distinctly to focus on the relevant issues.

## **Conclusion**

The Division reviewed RMP's proposed Power Quality Report Template, the comments filed by Clean Harbors Aragonite and the Utah Petroleum Association, and determined that the proposed template appropriately reflects the Work Group's collaborative effort and scope of this docket. Therefore, the Division recommends that the Commission approve the reporting template. The Division recommends that RMP continue to address the concerns of the Industrials to find a reasonable solution. The Work Group has accomplished the scope of this docket and therefore the Division recommends the Work Group be dissolved.

cc: Jana Saba, RMP  
Michele Beck, OCS  
Service List

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<sup>5</sup> See Public Service Commission of Utah, Order, Rocky Mountain's Service Quality Review Report, Docket No. 20-035-22, June 23, 2020, page 2, <https://pscdocs.utah.gov/electric/20docs/2003522/3143552003522o6-23-2020.pdf>.