

Phillip J. Russell (10445)
JAMES DODGE RUSSELL & STEPHENS, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrslaw.com

Attorneys for Utah Association of Energy Users

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for 2022 All Source Request for Proposals	Docket No. 21-035-52
---	----------------------

REPLY COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS

On June 28, 2022 Rocky Mountain Power (“RMP”) filed a template for a new Power Quality Report to be filed annually with the Commission beginning in 2023. On July 1, 2022, the Commission requested that interested parties submit comments on RMP’s proposed reporting by July 27, 2022. The Division of Public Utilities (“DPU”), and Clean Harbors Aragonite (“CHA”) and the Utah Petroleum Association (“UPA”), jointly, filed comments on July 26, 2022. On August 29, 2022, the Commission docketed a Request for Reply comments requesting that interested parties file reply comments on or before September 29, 2022. The Utah Association of Energy Users (“UAE”) participated in the working groups that preceded RMP’s initial filing in this docket, is an interested party, and submits the following reply comments.

REPLY COMMENTS

UAE submits these Reply comments to support the recommendations presented in the comments filed by CHA/UPA and to respond to the comments filed by DPU. In those comments, CHA/UPA asserted that their goal was “to enable greater transparency into power quality events and their root causes, spur increased partnership between the Company and its industrial customers to develop site-specific, power quality solutions where needed and to identify near- and long-term objectives and tangible implementation plans to improve industrial power quality. CHA/UPA Comments at 1-2. UAE shares these goals and submits the following Reply comments.

Response to DPU Comments

UAE disagrees with the DPU’s comments to the extent that they imply that the Work Group that convened to discuss reporting of power quality issues reached unanimous agreement on all matters to be included in the power quality report template. In its comments, DPU states that the working group “collaboratively developed the Power Quality Report Template that RMP filed with the Commission on June 27, 2022,” and that the template “appropriately reflects the Work Group’s collaborative effort.” [DPU Comments at 2]. While the Work Group did work in a collaborative manner to develop a template, no consensus was reached on what information should and should not be included in the template.

All Work Group participants agreed that the information that RMP included in its proposed template should be included, but certain Work Group participants sought to include other information that RMP and other Work Group participants did not agree should be included in the template. That additional information is discussed in the July 26, 2022 comments filed by CHA

and the UPA. During the Work Group meetings, UAE generally supported the requests to CHA and UPA to include additional information in the reporting template that were not included in the template submitted by RMP in this docket.

Response to Comments by CHA & UPA

UAE participated in the Work Group and supported the recommendations made by CHA and UPA in Work Group meetings. UAE generally supports the comments and recommendations submitted by CHA and UPA in this docket. Like CHA and the members of UPA (some of whom are also UAE members), UAE members have experienced power quality issues at their facilities and have worked with RMP to identify and mitigate those problems, while working to prevent their recurrence.

The comments submitted by CHA and UPA address the various interruptions, voltage sags, surges, or momentary outages that have occurred at the CHA facility and at the UPA refineries, and describe the consequences of even a momentary outage at those industrial facilities. UAE members have experienced similar power quality and reliability episodes in recent years. UAE members operate a wide variety of facilities, including refineries, manufacturing plants, hospitals and clinics, and universities. These facilities face various consequences in the event of a service interruption or a voltage disruption. Like the CHA facility and the UPA refineries, voltage disruptions can cause some UAE member facilities to open emergency vents for safety reasons, which results in a bypass of emissions control equipment that exacerbates air quality problems along the Wasatch Front. Other UAE facilities, like hospitals and clinics, utilize sensitive equipment that can automatically shut off in the event of a voltage disruption, which can lead to the loss of life-saving tissues and vaccines and can threaten the durability of the equipment.

Voltage disruptions can also threaten sensitive and expensive equipment at manufacturing facilities and universities.

UAE participated in the Work Group in the hopes of reducing the number and severity of power quality events and to increase transparency in reporting on such events. UAE hopes that greater transparency in reporting on these issues will lead to earlier detection of problems and, critically, earlier and better solutions to the problems detected.

UAE supports the recommendations by CHA and UPA that the annual power quality report filed with the Commission include the following information in addition to the information represented in the template filed by RMP:

- When available, three to five years of backward-looking data;
- Inspection and maintenance schedules and practices in a manner that enables access to the information for interested or affected parties subject to the Commission's rules governing confidentiality;
- Proposed remedies to resolve identified issues, with a timeline for implementation;
- 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
- 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.

UAE believes that including this additional information in the annual power quality reporting template will improve the transparency and quality of those reports. Reports on power quality events can be useful, but only to the extent that the information provided in those reports lead to improved outcomes for RMP and its customers.

Requiring that certain information be included in an annual Power Quality Report is, of course, not the only way to improve outcomes. The comments submitted by CHA and UPA

include a number of recommendations intended to more directly address power quality issues and to facilitate greater transparency and partnership between RMP and its commercial and industrial customers. These recommendations include the following:

- Require RMP to share root cause analyses (if any) conducted for power quality events with any known or reasonably expected to be affected RMP industrial and commercial customers;
- Require RMP to invest in additional power quality meters to better track industrial power quality and to assist in root cause analyses of events to support identification of priority areas for needed maintenance and updates;
- Require RMP to formalize communication practices to ensure timely, and where possible, advance notice of any power quality events;
- Require RMP to 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;
- Require RMP, upon an affected customer's request, to designate an engineering team to work with the affected customer's team to conduct site-specific audits and identify feasible solutions; and
- Require RMP, as part of that site-specific audit, to identify any RMP facilities or assets that may be leading to power quality events, to inform the customer of those facilities that may be causing power quality events, and to provide a reasonable action plan to address needed RMP infrastructure improvements.

The site-specific and event-specific information sought in these recommendations would allow commercial and industrial customers to better understand the cause of power quality events that affect their facilities and provide better opportunities to prevent those events or mitigate their effects.

CONCLUSION

UAE members appreciate the relationships they have with RMP and appreciate RMP's efforts to reduce power quality events and to mitigate their effects. UAE hopes to continue

working with RMP to improve reliability for commercial and industrial customers and believes that the recommendations set forth in the comments filed by CHA/UPA will, if adopted, lead to better outcomes. UAE supports these recommendations and asks the Commission to adopt them.

DATED this 29th day of September 2022.

Respectfully submitted,



By:

Phillip J. Russell
JAMES DODGE RUSSELL & STEPHENS, P.C.
Attorneys for UAE

Certificate of Service
Docket No. 22-035-34

I hereby certify that a true and correct copy of the foregoing was served by email this 29th day of September 2022 on the following:

ROCKY MOUNTAIN POWER

Emily Wegener	emily.wegener@pacificorp.com
Jana Saba	jana.saba@pacificorp.com
	Datarequest@pacificorp.com

DIVISION OF PUBLIC UTILITIES

Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Doug Wheelwright	dwheelwright@utah.gov
Bob Davis	radavis@utah.gov
Madison Galt	mgalt@utah.gov
Patricia Schmid	pschmid@agutah.gov
	dpudatarequest@utah.gov

OFFICE OF CONSUMER SERVICES

Michele Beck	mbeck@utah.gov
Bela Vastag	bvastag@utah.gov
Alyson Anderson	akanderson@utah.gov
Alex Ware	aware@utah.gov
Robert Moore	rmoore@agutah.gov
	ocs@utah.gov

UTAH PETROLEUM ASSOCIATION

Rikki Hrenko-Browning	Rhrenko-browning@utahpetroleum.org
-----------------------	------------------------------------

CLEAN HARBORS ARAGONITE

Michelle Brandt King	mking@hollandhart.com
Ashley Peck	apeck@hollandhart.com
Adele Lee	aclee@hollandhart.com

/s/ Phillip J. Russell

Phillip J. Russell