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September 29, 2022

VIA ELECTRONIC FILING

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

Attn: Gary Widerburg
Commission Administrator

Re: **Docket 22-035-34 – In the Matter of Rocky Mountain Power’s Request to the Establish Reporting for Power Quality**
Rocky Mountain Power’s Reply Comments

PacifiCorp d/b/a Rocky Mountain Power (“the Company”) hereby submits for filing its reply comments in accordance with the Request for Reply Comments issued on August 29, 2022 by the Public Service Commission of Utah (“Commission”) in the above referenced matter.

Questions may be directed to Jana Saba at (801) 220-2823.

Very truly yours,

A handwritten signature in black ink that reads "Joelle Steward". The signature is written in a cursive, flowing style.

Joelle Steward
Senior Vice President, Regulation and Customer & Community Solutions

cc: Service List

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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF ROCKY
MOUNTAIN POWER’S REQUEST TO
ESTABLISH REPORTING FOR POWER
QUALITY**

DOCKET NO. 22-035-34

ROCKY MOUNTAIN POWER’S REPLY COMMENTS

In accordance with the Utah Public Service Commission’s (“Commission”) Request for Reply Comments dated August 29, 2022 , PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), by and through its counsel, provides these Reply Comments to the comments filed by the Division of Public Utilities (“DPU” or “Division”), as well as the joint comments filed by Clean Harbors Aragonite (“Clean Harbors”) and the Utah Petroleum Association (“UPA”) on July 26, 2022. Clean Harbors and UPA will be collectively referred to as “Parties” throughout these Reply Comments.

INTRODUCTION

The Company filed its proposed Reporting for Power Quality on June 27, 2022 (“PQ Report”), which included a template of the proposed PQ Report that was developed by the Company and reviewed and supported by the service quality review workgroup (“Workgroup”). The template contained sample data to illustrate the information and format that will be used in the PQ Reports. Also, the Company noted that the PQ Report will allow the Commission and

interested parties to monitor power quality but does not contain any specific metrics or standards related to power quality.

On July 26, 2022, DPU, Clean Harbors, and UPA provided comments on the proposed PQ Report along with recommendations to the Commission. The DPU stated that the proposed PQ Report reflects the Workgroup's collaborative efforts and recommended that the Commission approve it. Clean Harbors and UPA expressed concern about the impacts of power interruptions. Specifically, Clean Harbors mentioned the impact on its production, opportunity costs, and wear on operating assets; and UPA mentioned the impact on air quality implications, environmental health impacts, and its funding of projects that, which is believes benefit not only UPA members but the Company's other customers. Clean Harbors and UPA recommend a number of items, which they categorize as relating to transparency, partnership, and objectives and implementation plans.

Rocky Mountain Power appreciates the thoughtful comments submitted by DPU, Clean Harbors, and UPA. The Company agrees with the DPU's comments that the PQ Report template, which is designed to allow the Commission to monitor power quality, be approved as filed as it reflects the Workgroup's collaborative effort. The Company understands that power quality events, which are often outside the Company's control, can be costly and have undesirable consequences on its customers. As a result and as explained below, the Company works closely with customers who are impacted to resolve the power quality issues. However, the Company respectfully recommends that the Commission deny the recommendations of Clean Harbors and UPA as they related to the proposed PQ Report. The purpose of the PQ Report is to allow the Commission and others more transparency into the issue. The Commission should not amend the PQ Report template to require the requested information because the recommendations are either

practices that the Company already engages in or they are recommendations that could prioritize the interests of the power quality sensitive customers at the expense of the Company's other customers. The Company recommends the Commission suspend its decision on these issues until it has time to evaluate the information provided in the PQ Report. The Company responds to the Parties' specific concerns and recommendations in these reply comments.

RESPONSE

The genesis for the proposed PQ Report began with the Company's annual Service Quality Review report ("SQR Report") for calendar year 2019 that was filed by the Company on May 1, 2020, in Docket No. 20-035-22. In comments on the 2019 SQR Report, the DPU recommended that a Service Quality workgroup ("Workgroup") convene to review the baseline control zones and notification levels for the System Average Interruption Duration and Frequency Indices ("SAIDI" and "SAIFI"). At the first Workgroup meeting, certain industrial customers, including UPA, raised concerns associated with power quality, including the impact of sags and swells on certain industrial customers who are sensitive to such events, and requested the Workgroup be used to explore the possibility of developing power quality metrics. The Company and other Workgroup participants, which included the DPU and the Office of Consumer Services, agreed. So, although the baseline reviews of SAIDI and SAIFI pertaining to service quality were resolved relatively quickly, the Workgroup continued to meet at the request of the UPA and other industrial customers to discuss power quality concerns. Through the ongoing meetings, the complexities of power quality were thoroughly discussed. After these discussions, the Workgroup determined that the best path forward would be to develop an annual ongoing PQ Report to provide transparency and information concerning power quality events that would be accessible to the Workgroup, Commission and any other interested member of the public. Through this, the

Workgroup envisioned a new process would be created by which power quality could be regularly monitored and interested parties could provide comments.

Rocky Mountain Power is committed to providing safe, reliable electric service to its customers at just and reasonable rates. Power quality issues are complex and do not lend themselves to a “one size fits all” system of metrics, indices or even solution. The Company’s customers in Utah can be vastly different as to how sensitive they are to power quality events. Costly upgrades are required in some cases to address concerns by those customers who are most sensitive to power quality events. Due to the wide range of conditions that can cause a voltage sag or an event, many of which are largely outside of the Company’s control, it is not possible to eliminate power quality events completely, just as it is not possible to eliminate all power outages. With this said, the Company recognizes that the UPA and Clean Harbors are not necessarily asking for perfect power. The Company also acknowledges that these events can be costly and have undesirable consequences for some of its more sensitive customers.

However, the Company is concerned with the Parties’ recommendations because they largely request the PQ Report be modified to include either actions the Company is already taking or actions that would prioritize the interests of the power quality sensitive customers, raising fairness and cost shifting concerns of customers who do not have the same sensitivity before the Commission has any evidence on which to make a determination. The Company is committed to addressing power quality concerns and has historically worked with and commits to continue working with its industrial customers on an individual basis to address and resolve power quality concerns. For example, the Company meets regularly with several Utah based industrial customers on an ongoing basis to discuss power quality issues related to their service. Through these interactions the Company has identified system hardening projects ranging from localized bird

mitigation and insulator replacements to major projects like the Wasatch Springs – Gadsby 46 kV line insulator replacement project and the planned Terminal West Bus replacement project.

Further, the PQ Report, as filed, was designed to allow the Commission to monitor power quality. However, the Parties' recommendations go a step further, such as requiring the Company to commit to system upgrades that are not necessarily appropriately assigned to the Company and its other Utah customers. These recommendations should not be considered until actual data has been filed and evaluated by the Commission. While the Company understands a customer's desire to resolve a power quality issue, there must first be a determination about when the costs to achieve a certain level of power quality needed for a specific customer, who is more sensitive, should be shouldered by other customers and at what point should the customer needing the higher quality of service be required to pay for the upgraded equipment. It is similar in concept to customers who are sensitive to power outages and elect to install backup generators or other sources of power.

For these reasons, the Company recommends that the Commission approve the PQ Report template as submitted. Any party with concerns will have the opportunity to file comments on the PQ Report to raise issues with the Commission.

REPLY TO RECOMMENDATIONS

A. TRANSPARENCY

Recommendation #1: Share all root cause analyses for power quality events for any known or reasonably expected to be affected RMP industrial customers.

RMP Response: Root cause analyses are provided to customers through customer specific reporting to identify solutions and impacts to the customer. Not all power quality events affect customers and providing a root cause for all events will burden the Company for very little, if any, value to the PQ Report.

Recommendation #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.

RMP Response: The Company utilizes a fleet of mobile power quality devices that can be deployed as needed to customer sites or Company substations. The Company is already working to increase its capabilities with respect to monitoring of power quality, but believes this can be done in a more cost effective manner than simply buying, installing and monitoring more power quality meters. For example, the Company is working to enable basic power quality functionality in industrial revenue meters, which are capable of measuring power quality. Seventeen meters have been reprogrammed to enable this functionality, with many more planned.

Advanced metering infrastructure (“AMI”) also has basic power quality functionality currently accessible for residential and small commercial meters that have been installed in the AMI deployment. This accessibility will continue to increase as the AMI meter deployment progresses.

Finally, power quality meters are installed as a standard in new regional transmission substations as part of their construction scope. They are also installed in regional transmission substations if needed to monitor power quality in a particular area.

Recommendation #3: Include three to five years of backward-looking data in the annual PQ Reports, rather than forward-looking only.

RMP Response: Power quality event reviews containing three to five years of backward-looking data are time-consuming to prepare. However, the Company recognizes the reports can provide valuable information to certain customers, so the Company does prepare them

for individual customers when requested to identify potential causes of power quality events and possible remediation.

The Company requests the Commission not adopt this recommendation because it would be overly burdensome to extract the data and analyze it for event correlation. System faults are a daily occurrence and may trigger an event on a power quality meter depending on the fault's proximity to the meter. Correlating those power quality events to fault events with cause is a time-consuming manual process. Under the Company's proposal, the first PQ Report will contain 2022 data and then as annual reports are filed will include the prior year's data and for subsequent years the prior years' reporting will serve as a repository where interested parties can access the data.

Recommendation #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.

RMP Response: The Company follows all federal and state required inspections and maintenance for electric utilities. For bulk electric transmission facilities, maintenance and inspections are periodically audited by the Western Electric Coordinating Council. For distribution and local transmission lines, the Company complies with state and local requirements. The state has adopted the National Electric Safety Code as a guide for maintaining facilities and the Company inspects equipment on intervals based on its experience. The effort and results of inspections and maintenance programs are outlined in the Service Quality Review report submitted to the Commission semi-annually. Therefore, including the information in the PQ Report would be duplicative.

B. PARTNERSHIP

Recommendation #1: Formalize communication practices to ensure timely, and where possible, advance notice of any power quality events.

RMP Response: Account managers, upon notification by either the dispatch center or customer after a power quality event has occurred, work with the customer and internal Company resources to provide information needed regarding the event and identify if any corrective action or system improvements are needed to reduce the potential for a similar event to occur. Rocky Mountain Power utilizes a planned maintenance system that account managers use to notify customers in advance of planned maintenance that could impact their service. Power quality events usually are not known in advance. Therefore this recommendation with respect to the PQ Report is not necessary.

Recommendation #2: 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.

RMP Response: Rocky Mountain Power has account managers that work closely with large industrial and commercial customers. Customers that are experiencing power quality issues will report them to their account manager who will engage the Company's power quality team to investigate their concerns. As part of that investigation, a tracking log is provided to the customer to assist them in identifying when power quality events have occurred and to monitor for future power quality events. Therefore, this recommendation with respect to the PQ Report is not necessary.

Recommendation #3: 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.

RMP Response: The Company's engineering teams are regularly assembled to conduct site-specific audits and identify feasible solutions to power quality issues. The Company commits to continuing with this practice; as such, inclusion of a requirement in the PQ Report is not necessary.

Recommendation #4: 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.

RMP Response: Rocky Mountain Power facilities are regularly identified in root cause analysis reports, identified to the customer, and where reasonable an action plan is recommended to address RMP infrastructure improvements. The Company commits to continuing with this practice; as such, inclusion of a requirement in the PQ Report is not necessary.

C. OBJECTIVES AND IMPLEMENTATION PLANS

Recommendation #1: Present proposed remedies to resolve identified issues, with a timeline for implementation.

RMP Response: The Company regularly provides a reasonable action plan with remedies to identified issues and where applicable, a timeline for implementation. The Company commits to continuing with this practice; as such, inclusion in the PQ Report is not necessary. This recommendation, in particular, concerns the Company that the UPA and Clean Harbors mean to imply that any power quality issues should be resolved at the expense of the Company before any

evidentiary support is submitted, which could shift costs to other customers so that a certain subset of customers can have a higher level of service.

Recommendation #2: 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.

RMP Response: Most, if not all, implemented improvements on the Company's system have a proactive and positive impact on reliability and service quality. Annual service quality reports filed with the Commission track reliability improvement year over year and inherently correlate to power quality improvement. This is due to a vast majority of power quality issues resulting from system faults which also cause system outages.

System improvements' effects on power quality may only be applicable to a few select customers. Providing a system wide power quality improvement review correlated to all system improvements is unduly burdensome and provides limited benefit to a vast majority of customers. The PQ Report will allow the Commission to monitor power quality and identify any proactive measures it believes are appropriate once evidence has been established that the level of service currently offered by the Company is inadequate. This recommendation is premature.

Recommendation #3: 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.


RMP Response: The Company has an inspections and maintenance program to identify ill-functioning equipment and recommended timelines to repair or replace such equipment based on priority levels. Inspections and maintenance activities are performed monthly, annually, or at longer intervals depending on the type of inspection/maintenance activity. The Company notes

that if an asset reaches its expected useful life but is still functioning adequately, it is not automatically replaced because of its age. The Company commits to continuing with this practice; as such, inclusion of such a requirement would likely drive costs and result in functioning equipment being replaced without any guarantee of improving power quality.

CONCLUSION

For the foregoing reasons, the Company respectfully requests the Commission approve its proposed PQ Report as filed on June 28, 2022. The recommendations put forth by the UPA and Clean Harbors should be rejected at this time. Additional monitoring, remediation and requirements should not occur until the Commission has had the opportunity to monitor the Company's power quality performance to assess the true need for further action.

Respectfully submitted this 29th day of September
2022.


Carla Scarsella

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 22-035-34

I hereby certify that on September 29, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

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