

State of Utah

SPENCER J. COX Governor

DEIDRE M. HENDERSON Lieutenant Governor

November 1, 2022

Ms. Jana Saba Rocky Mountain Power 1407 West North Temple, Suite 330 Salt Lake City, UT 84116

Public Service Commission

THAD LeVAR Chair

DAVID R. CLARK Commissioner RON ALLEN Commissioner

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

Dear Ms. Saba,

The Public Service Commission of Utah (PSC) has reviewed Rocky Mountain Power's (RMP) proposed new power quality report template ("Template") filed on June 28, 2022. The PSC has also reviewed stakeholders' comments and reply comments. Specifically, on July 26, 2022, the Division of Public Utilities (DPU) filed comments and Clean Harbors Aragonite and the Utah Petroleum Association (collectively, "Industrial Customers") filed joint comments. DPU, the Utah Association of Energy Users (UAE), and RMP filed reply comments on September 29, 2022.¹

The Industrial Customers commend the Template as a "good starting point," but they provide several additional recommendations with respect to Transparency, Partnership, and Objectives and Implementation Plans ("Recommendations"). DPU and RMP oppose these Recommendations.

DPU emphasizes the intention of the new power quality report is to provide a systemwide reliability performance summary and the Recommendations are outside the intended scope, seeking to address more narrow concerns belonging to the Industrial Customers. DPU further argues developing the metrics the Industrial Customers seek would be "no small undertaking" and the associated expenses would have to be carefully allocated to the benefiting group of customers. Therefore, DPU recommends the PSC approve RMP's Template and suggests RMP continue to meet with the Industrial Customers to discuss solutions to their concerns.

¹ UAE filed revisions to its reply comments on September 30, 2022.

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RMP similarly contends the Industrial Customers' concerns should not be prioritized at other customers' expense. RMP further explains it already provides much of the information the Industrial Customers seek to individual customers at their request. RMP asks the PSC approve the Template and reserve any decision on the Recommendations until after RMP files, at least, its first report.

Based on the PSC's review of the Template, comments, and reply comments, the PSC approves the Template and proposed schedule for filing the report. Without a record to establish the approximate cost of satisfying the Industrial Customers' Recommendations and how those costs may be justly allocated consistent with principles of cost causation, the PSC declines to require RMP to implement the Recommendations at this time. The PSC acknowledges the value the Industrial Customers brought to the work group by raising the issues discussed in the comments and reply comments. The PSC encourages informal discussions to continue among RMP and the Industrial Customers. After the PSC and stakeholders have had an opportunity to review RMP's first power quality report, any interested stakeholder may file a request for the PSC to convene additional process for revisiting the reporting requirements.

Sincerely,

/s/ Gary L. Widerburg PSC Secretary DW#326013