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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s Power Quality Report for the period of January through December 2022	DOCKET NO. 22-035-05
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COMMENTS OF THE UTAH PETROLEUM ASSOCIATION

The Utah Petroleum Association (“UPA”) herby submits these Comments pursuant to the Public Service Commission of Utah’s (“Commission”) Notice of Filing and Comment Period (“Notice”), issued February 17, 2023, with respect to Rocky Mountain Power’s (“RMP” or “The Company”) Power Quality Report for the period of January through December 2022, which was filed on February 14, 2023.

Introduction

UPA credits RMP for their first annual Power Quality Report (“PQ Report”), which is an important step to providing needed data regarding power quality and trends over time as applicable to large industrial customers. UPA and its refinery members also appreciate RMP’s recent partnership efforts outside of this report and the related Division-led Work Group to improve power reliability. These efforts include two new delivery projects developed in consultation with industry that will serve to improve resiliency once complete.

UPA suggests the below recommendations for the Division's consideration, to further increase the constructive value of future power quality reports.

Background on UPA

UPA is a statewide oil and gas trade association representing companies involved in all aspects of Utah's oil and gas industry. Members include the refining sector, each of which is a RMP industrial customer. These refineries have experienced power quality interruptions at their facilities for many years, with impact to safety, air quality, and operational reliability as they work to supply liquid fuels to meet Utahns' transportation needs. While the refineries continue to collaborate with RMP to identify, mitigate, and where possible, prevent the recurrence of these outages, including through jointly funded improvements, power quality remains a top priority for UPA because the consequences of voltage sags, surges, or even momentary outages at these facilities can be far reaching with impacts beyond the facility fence lines.

UPA's Comments and Recommendations

UPA suggests the following recommendations for the Division's consideration, and believes that pursuit of these additional actions will lead to improved outcomes for RMP and its customers:

- Include all power, trip events and minor outages in the Voltage Sag Event Summary of the PQ Report. At this time, only power events (i.e., events below the SEMI-F47 curve) are reported. Providing data on minor outages that refineries and other industrial customers should anticipate to ride through (i.e., events above the SEMI-F47 curve) will provide a more accurate power quality landscape to inform resiliency efforts.
- Revise the reporting so that the incidents shown on the page 6 figure (events below the SEMI-F47 curve) have a corresponding identity in Table 3 so that the duration of events, ideally for both trip events and minor outages, is apparent. This will allow industrial facilities to better plan their investments to support their ability to ride through events.

- Provide a plan for the location and timelines of permanent installation of additional power quality meters on RMP substations serving industrial power users and include this data in the PQ Report, to support better understanding of power quality anomalies and identification of priority areas for needed maintenance and upgrades. Proactive, sustained data collection and reporting of power quality through these meters will help RMP and its industrial customers better understand both root causes of events as well as power quality over time and is the preferable way to pinpoint opportunities for improvement compared to the deployment of power quality spot checks.

While this report, based on the location of current power quality meters, points to certain “hot spot” locations, conversely, the lack of power quality meters at other locations along the system that are known to have power quality concerns stands to artificially skew the output of the report. The result of this limitation is that multiple and significant power quality events that had direct material negative impacts to UPA member facilities have not been accurately captured in this report, misinforming the corrective actions and investments needed to improve power quality. Respecting that this year one report is a starting point, we suggest prioritization of installing additional power quality meters in areas where customer concerns are known, to better capture a more representative dataset that will more accurately inform opportunities to improve system resiliency in areas of known concern not captured in this year one report.

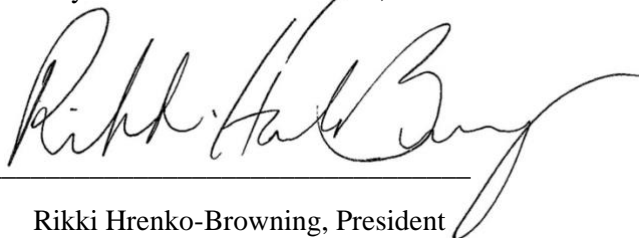
- Include actionable preventative maintenance and system improvement recommendations based on identified system issues. UPA appreciates the voltage sag event information presented in Table 3 but suggests a discussion of appropriate actions and plans to improve the resiliency of the system based on those events.
- UPA recognizes that HB 389 (2023), establishing the creation of electrical power delivery quality plans at approval of the Commission, may supplement this report and address some of our organization’s concerns relating to information about corrective actions or planned improvements. As of time of this writing, the legislation is pending decision with Governor Cox

and we look forward to discussing how the establishment of those plans may interact with this annual report.

Conclusion

UPA appreciates the opportunity to provide comment and looks forward to continued partnership with RMP to improve power quality and reliability in Utah.

Respectfully submitted this March 15, 2023

By: 
Rikki Hrenko-Browning, President
Utah Petroleum Association

CERTIFICATE OF SERVICE

Docket No. 22-035-05

I hereby certify that on February 15, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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