

March 28, 2023

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

**RE: Docket No. 23-035-05 – Rocky Mountain Power’s Power Quality report for the
Period of January through December 2022**
Rocky Mountain Power’s Reply Comments

In accordance with the Notice of Filing and Comment Period issued by the Public Service Commission of Utah (“Commission”) on February 17, 2023, PacifiCorp d/b/a Rocky Mountain Power (“the Company”) submits its reply comments in response to the comments filed on March 16, 2023 by the Division of Public Utilities (“Division”) and the Utah Petroleum Association (“UPA”).

Background

On February 15, 2023, RMP filed its first Power Quality Report (“PQ Report”) as established in Docket No. 22-035-34. The PQ Report was created using the template that was approved by the Commission in Correspondence dated November 1, 2022 in Docket No. 22-035-34 (“Approval Letter”). The PQ Report was developed through a collaborative process that included the Division of Public Utilities, Office of Consumer Services, Utah Association of Energy Users, Utah Petroleum Association, Utah Mining Association, and Clean Harbors Aragonite Inc. In the Approval Letter, the Commission encouraged continued informal discussions by the Company and its industrial customers regarding power quality. The Company has continued to meet regularly with its industrial customers to discuss individual customer needs.

Response to Division’s Comments

In comments, the Division recommends that the Commission acknowledge the PQ Report as meeting the requirements and take no further action at this time. The Division’s comments also expresses concern about the number of events occurring below the SEMI-F47 line and specifically focuses on the events that are were reported as caused by either “Equipment” or “Customer Equipment” on the Table 3 of the PQ Report. Although the Division does not make any recommendations based on this observation, they state that for now the first PQ Report will provide a starting point to evaluate the power quality performance in future reports.

For power quality events, the Company does not always know the exact root cause of the event. For events that were reported as equipment failures, it is possible that an external factor was the primary cause of equipment failure, such as avian activity or a weather event. For some events,

there is enough evidence to know the root cause, like a mylar balloon, but it is not always possible to determine. If the Company is unable to determine the root cause of the event, it is classified as equipment failure even though in all cases it may not be the root cause. The Company also clarifies that customer equipment is owned and maintained by a customer connected to the network.

Response to UPA's Comments

The UPA submitted comments with several recommended changes to the PQ Report. The Company will address each recommendation.

First, the UPA requests that the Company be required to include all power, trip events and minor outages in the Voltage Sag Event Summary of the PQ Report in addition to the events below the SEMI-F47 curve. The UPA claims this will help refineries and other industrial customer to be able to anticipate the power quality landscape when engaging in resiliency efforts.

The Company objects to this recommendation. As noted by the Division, the SEMI-F47 curve is an industry guideline that compares voltage events that can potentially be ridden through by customers, and those that likely cannot. If adhered to, it offers a realistic probability of customers being able to ride through a majority of utility voltage events. The inclusion of all events would obfuscate information on the PQ Report that may lead to meaningful conclusions about the Company's system and how it could potentially be improved to better customer power quality.

Second, the UPA recommends the Company modify the PQ Report so the incidents reported in the Figure on page 6 can be tied to Table 3. The inclusion of duration and voltage for every meter in the table on each event would cause the table to overflow the page. Because the voltage magnitude in reality differs for each customer experiencing a given event, and is only measured at the meter, it does not provide any meaningful information other than knowing it may have been a triggering event. The duration, however, would be experienced the same by each customer. The Company will consider including event duration as space in the report allows.

Third, the UPA requests the Company provide a plan for permanent installation of additional power quality meters on the Company's substations, claiming that the location of the power quality meters skews the reporting data and does not accurately capture power quality events that had negative impacts to UPA customers.

The PQ Report includes permanently mounted/placed meters with a sag/swell log programmed located in Company substations. The Company has currently prioritized the addition of power quality monitors at individual customer sites. As noted previously, voltage magnitude for fault events varies for each individual customer, depending on their proximity to the fault event on the Company's system. Providing metering at customer sites will offer the greatest benefit to customers overall as it enables specific and customized reporting of power quality events to individual customers. A majority of the Company's power quality work is done with individual customers to enable actionable solutions on both the customer and Company's systems as appropriate. Each of the UPA members have individual power quality metering installed at their point of delivery and their data are reported to their members regularly.

Furthermore, it was determined in the working group that individual customer meter data should not be included in a global report due to privacy concerns. The Company does not currently have plans to propagate Company substation power quality metering, but does install the meters as necessary for regional monitoring.

Fourth, the UPA suggests that the Company should be required to include actionable preventative maintenance and system improvement recommendations based on identified system issues. 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. Through these interactions the Company identifies 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. 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.

Conclusion

The Company appreciates the Division's and UPA's participation and involvement in the collaborative discussion and looks forward to continued partnership in addressing power quality concerns. The Company respectfully requests the Commission decline to adopt the UPA's recommendations at this time for the reasons provided.

Sincerely,

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

Enclosures

CC: Docket No. 23-035-05

CERTIFICATE OF SERVICE

Docket No. 23-035-05

I hereby certify that on March 28, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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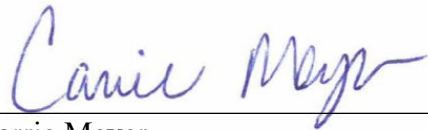
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