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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Division Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Bob Davis, Utility Technical Consultant
Matthew Pernichele, Utility Analyst

Date: May 31, 2023

Re: **Docket No. 23-035-21**, Rocky Mountain Power's Service Quality Review Report for the Period January through December 2022

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) acknowledge Rocky Mountain Power's (RMP) January 1, 2022, through December 31, 2022, Service Quality Review Report (Report). The current report complies with all prior Commission Orders¹²³⁴ and also complies with the requirements of Utah Administrative Code Rule R746-313.

Issue

On May 1, 2023, RMP filed its Report with the Commission for the 2022 reporting period. On May 1, 2023, the Commission issued an Action Request asking the Division to review RMP's filing for compliance and to make recommendations. The Commission asked the

¹ Docket No. 08-035-55, *Commission Order*, June 11, 2009,

<https://pscdocs.utah.gov/electric/08docs/0803555/62486Order%5bDOCKETED%5d.pdf>.

² Docket No. 08-035-55, *Commission Order*, and Docket No. 13-035-01, *Commission Order*, December 20, 2016,

<https://pscdocs.utah.gov/electric/13docs/1303501/2908801303501and1503572omrclabnl12-20-2016.pdf>

³ Docket 15-035-72, *Commission Order*, December 20, 2016,

<https://pscdocs.utah.gov/electric/13docs/1303501/2908801303501and1503572omrclabnl12-20-2016.pdf>

⁴ Docket No. 20-035-22, *Commission Orders*, June 23, 2020, and January 26, 2021, respectively,

<https://pscdocs.utah.gov/electric/20docs/2003522/3143552003522o6-23-2020.pdf>, and
<https://pscdocs.utah.gov/electric/20docs/2003522/3170962003522omrclabnl1-26-2021.pdf>.

Division to report back by May 31, 2023. On May 2, 2023, the Commission issued its Notice of Filing and Comment Period and asked any interested person to file comments by May 31, 2023.

Background

RMP developed its Customer Service Standards and Service Quality Measures nearly 20 years ago. The standards were developed to demonstrate to customers that RMP is serious about serving them well and willing to back its commitments with cash payments in cases where the company falls short. RMP developed these standards by benchmarking its performance against relevant industry reliability and customer service standards. In some cases, RMP has expanded upon these standards. In other cases, largely where the industry has no established standard, RMP developed its own metrics, targets, and reporting methods.⁵

In Docket No. 20-035-22, the Division reviewed RMP's 2019 service quality and recommended the Commission establish a work group to review RMP's reliability baseline standards related to SAIDI and SAIFI and make recommendations. The Commission accepted this recommendation and directed RMP and the Division to convene a work group, open to interested parties, to examine RMP's reliability baseline standards and to make recommendations. In accordance with the Commission directive, the parties convened a workgroup that met to discuss new baseline performance standards, which are reflected in this report.⁶

Discussion

In accordance with the Commission's Notice of Filing and Comment Period, the Division reviewed RMP's January 1 through December 31, 2022, Report in light of the Commission's Orders in Docket Nos. 08-035-55, 13-035-01, 15-035-72, and 20-035-22, the Commission Rules, and the Utah Service Quality Review Work Group Report filed with the Commission

⁵ Docket No. 23-035-21, *Rocky Mountain Power's Service Quality Review Report for January through December of 2022* filed May 1, 2023, at 3, <https://pscdocs.utah.gov/electric/23docs/2303521/327830RMPsRvcQltyRvwRprtCY20225-1-2023.pdf>.

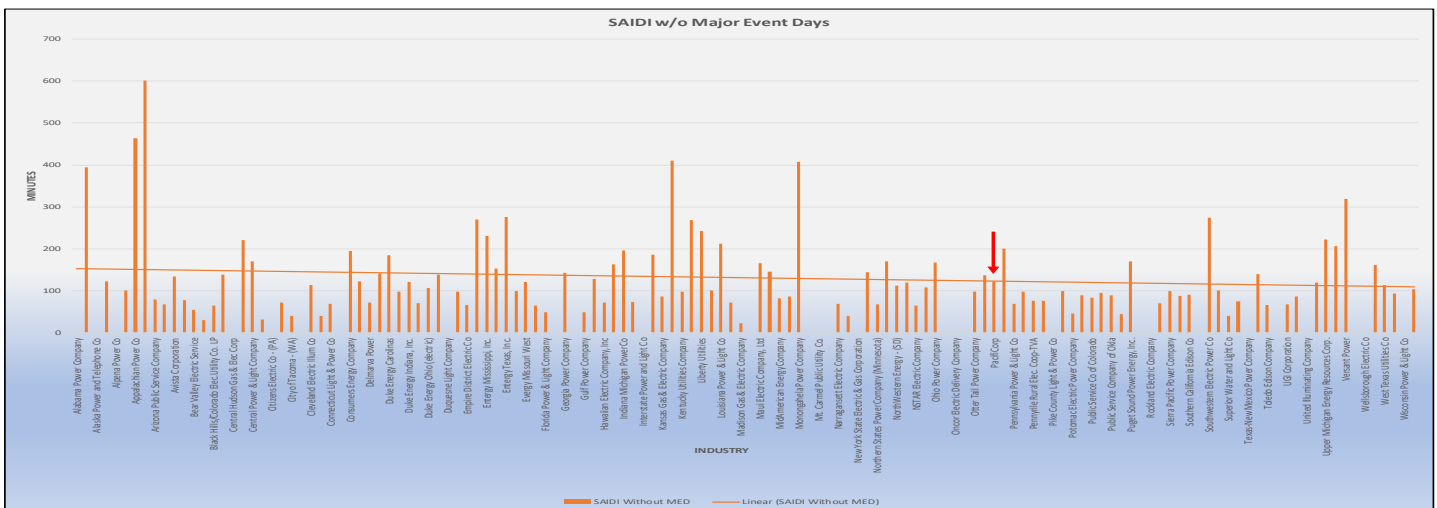
⁶ *Id.*

on September 13, 2006.⁷ The Division notes that the 2022 SAIDI and SAIFI values are within the revised control zone parameters approved by the Commission in Docket No. 20-035-22, on January 26, 2021. RMP’s reliability metrics continue to improve year-over-year.⁸

RMP’s SAIDI and SAIFI metrics show slightly better performance compared to its peer utilities across the country. Chart 1 illustrates the SAIDI metrics without major event days (MED) with an average trend of 130.3.⁹ PacifiCorp is included in the data with an average SAIDI of 122.2, which includes all of PacifiCorp’s system versus RMP’s reported Utah only metric of 114 including major events contained in this year’s report.¹⁰ This demonstrates that RMP is performing better than the industry average.

Note that the timing of the data used for Charts 1-4 is for the period of 2020 through 2021 and not timely for this year’s report but demonstrates that RMP’s Utah only SAIDI and SAIFI metrics are below the industry and state trends.

Chart 1



⁷ Docket No. 20-035-22, *Division Memorandum* filed December 21, 2020, at 3, and *Commission Order - Sections 1 and 2* filed January 26, 2021. SAIDI control zone of 107 to 157 minutes, SAIDI baseline notification level of 157 minutes, SAIFI control zone of 0.9 to 1.2 events, and a SAIFI baseline notification level of 1.2 events, <https://pscdocs.utah.gov/electric/20docs/2003522/316802DPUMemWrkGrp12-21-2020.pdf>.

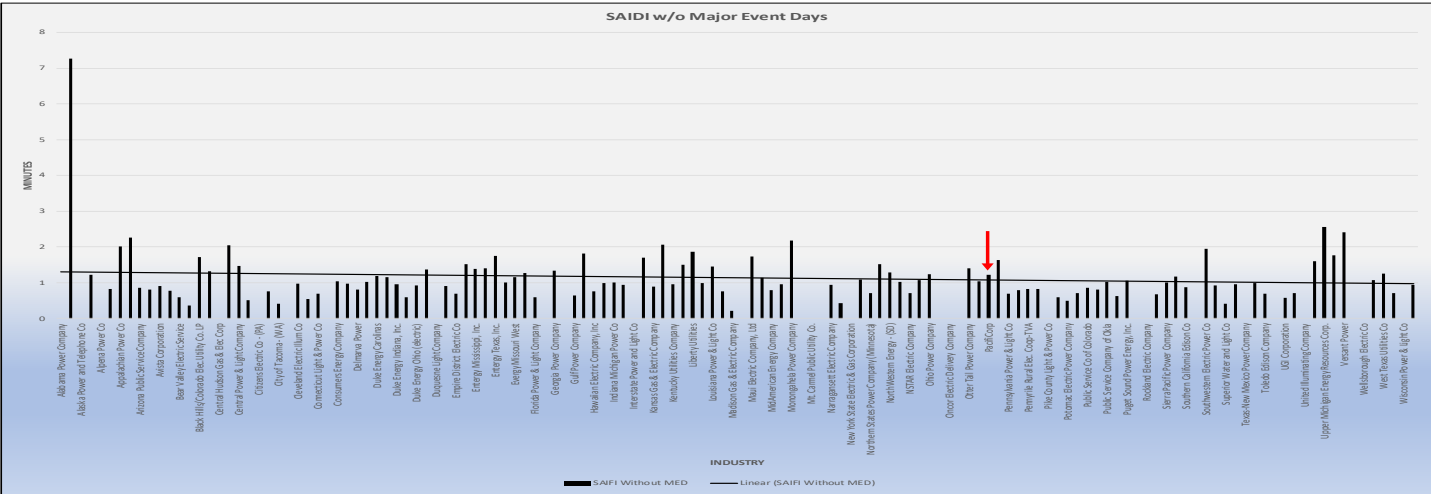
⁸ Docket No. 23-035-21, *Supra* note 5, at 4-8, <https://pscdocs.utah.gov/electric/23docs/2303521/327830RMPsRvcQltyRvwRprtCY20225-1-2023.pdf>.

⁹ HData, *Analyze Data – 2020 Utility Reliability*, <https://app.hdata.us/insights/utility-reliability>.

¹⁰ *Supra* note 5, at 4.

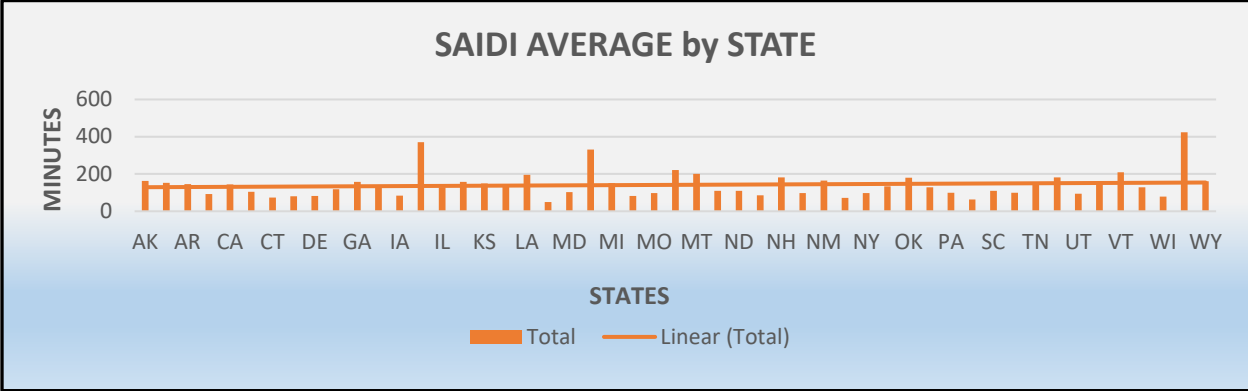
Chart 2 illustrates the Industry SAIFI metrics without MEDs with an average trend for the industry at approximately 1 which includes PacifiCorp. PacifiCorp’s average SAIFI, system-wide, is 1.2.¹¹ RMP’s current SAIFI metric is .921.¹²

Chart 2



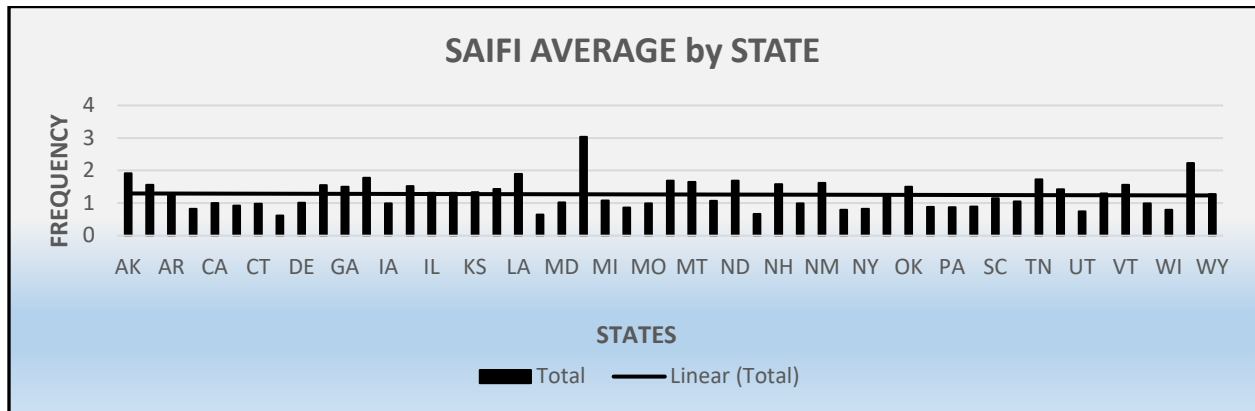
Charts 3 and 4 illustrate the SAIDI and SAIFI metrics on a state-wide basis excluding major events. Utah, which includes PacifiCorp and other utilities, is well below the average of all states.¹³¹⁴

Chart 3



¹¹ HData, *Supra* note 9.
¹² Docket No. 23-035-21, *Supra* note 5, at 5.
¹³ HData, *Supra* note 9.
¹⁴ U.S. Energy Information Administration, *Table 11.2 Reliability Metrics Using IEEE of U.S. Distribution System by State_2021-2022*, https://www.eia.gov/electricity/annual/html/epa_11_02.html.

Chart 4



Even though the timing of the data used in the proceeding charts are not timely, the charts offer a comparison of RMP’s performance in the industry and by state.

Equipment failures continue to be the largest contributor to SAIDI (36 percent), SAIFI (27 percent), and 49 percent of underlying incidents, year-over-year.¹⁵ The Division recognizes RMP’s efforts in its continuation to reduce SAIDI values through its Mainline Sectionalizing (MLS) plan.¹⁶ The MLS is designed to lower SAIDI and SAIFI numbers by limiting the number of customers on a feeder and sectionalizing circuits with reclosers to smaller groups of customers. However, the Division has not observed any significant year-over-year improvement in equipment related contributions (controllable distribution events) to the SAIDI and SAIFI metrics given the approximate same amount of capital spend and new connects, excluding gateway transmission and local transmission reinforcements, reported in 2022.¹⁷ The Division suggests that RMP continue to review its condition-based maintenance program in an effort to reduce equipment failures.

The Division continues to gain a better understanding of the equipment failure related to the underlying cause for the SAIDI and SAIFI metrics reported by RMP each year by compiling a peer-to peer comparison across the industry. Table 1, even though notably inconclusive

¹⁵ Docket No. 23-035-21, *Supra* Note 5, *Cause Analysis – Underlying SAIDI, SAIFI, and Incidents*, at 14-15.

¹⁶ Docket No. 22-035-14, *Rocky Mountain Power’s Service Quality Review Report* filed November 1, 2022, at 15.

¹⁷ Docket No. 23-035-21, *Supra* note 5, at 23-24.

based on peer-to-peer system comparisons, timing, and other factors,¹⁸ illustrates average equipment related failures for the industry.¹⁹

Table 1

SAIDI, SAIFI, CAIDI Underlying Equipment Failures %		
Utility	State	2021
Duquesne Light Company ¹	PA	17%
PECO Energy Company ¹	PA	20%
PPL Electric Utilities Corporation ¹	PA	13%
Metropolitan Edison Company ¹	PA	17%
Pennsylvania Electric Company ¹	PA	18%
Pennsylvania Power Company ¹	PA	7%
West Penn Power Company ¹	PA	10%
Citizens' Electric Company ¹	PA	5%
Pike County Light & Power Company ¹	PA	1%
UGI Utilities Inc ¹	PA	5%
Wellsboro Electric Company ¹	PA	20%
Con Edison ²	NY	82%
National Grid ²	NY	25%
NYSEG ²	NY	18%
RG&E ²	NY	19%
Cental Hudson ²	NY	16%
Orange & Rockland ²	NY	31%
PSEG-LI ²	NY	58%
Montana-Dakota Utilities Co. ³	MT	10%
NorthWestern Energy ⁴	MT	25%
Average		21%
Median		17%

¹⁸ The Division has some concerns with this peer-to-peer comparison due to the fact that each reporting district reports its metrics somewhat differently and reports are sparse and located throughout the country. However, the Division does acknowledge that the metrics provided here are a percentage of total underlying root cause independent of the metric used to evaluate each underlying root cause and at least establishes a baseline.

¹⁹ ¹PAPUC - Electric Service Reliability Report, https://www.puc.pa.gov/media/2053/2021-electric-reliability-report_final.pdf, ²NY Department of Public Service, <https://dps.ny.gov/system/files/documents/2022/12/2021-electric-service-reliability-report.pdf>, ³Montana-Dakota Utilities Co. Subsidiary of MDU, <https://psc.mt.gov/docs/Reports/Electric-Reliability/2021/MDU-MT-Annual-Electric-Reliability-Report-2021.pdf>, and ⁴NorthWestern Energy (avg of multiple systems), <https://psc.mt.gov/docs/Reports/Electric-Reliability/2021/NWE-2021-Electric-Reliability-Report.pdf>.

The Division plans to continue to collect data for equipment-related failures on a peer-to-peer basis across the industry in an attempt to develop a database as a comparison for system reliability. The Division anticipates that this information might be useful to better inform the reader of the significance of equipment failures as a root cause of the SAIDI, SAIFI, and other reliability metrics that may also lead to power quality issues.

The Division is concerned with RMP's customer response performance in answering calls within 30 seconds. RMP reports the customer response performance for 2022 at 63 percent. RMP's goal is 80 percent. The Division notes that RMP reports some improvement (70 percent) in this metric during Q1 of 2023. RMP states that insufficient staffing is the reason for the low response time and is working to fill open positions in its call center. The Division will continue to monitor this metric and will report any findings to the Commission.

Overall, the Division concludes that RMP is putting forth reasonable efforts to improve its customer service and reliability and is maintaining an overall customer guarantee performance of 99 percent.

Conclusion

The Division concludes that RMP is following the Commission's Orders and Rules, and recommends that the Commission acknowledge RMP's January 1, 2022, through December 31, 2022, Service Quality Review Report.

cc: Jana Saba, RMP
Michele Beck, OCS