



State of Utah

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Public Service Commission

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JOHN S. HARVEY, Ph.D.
Commissioner

December 12, 2023

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

Re: *Rocky Mountain Power's Service Quality Review Report, Docket No. 23-035-21*

Dear Ms. Saba,

The Public Service Commission (PSC) has reviewed Rocky Mountain Power's (RMP) January 1 – June 30, 2023 Service Quality Review Report, filed November 1, 2023 ("Report"). The Report provides information related to RMP's compliance with its customer service standards and service quality measures, reliability performance and history, customer service response, preventive and corrective maintenance, and other service quality and reliability efforts.

In addition, RMP requests the PSC approve the adoption of two proposed modifications in future reports. First, RMP seeks approval to change the qualification of major events by subdividing the state of Utah into five reliability reporting areas.¹ RMP explains that to improve identification of major events and accurately represent the reliability performance at regional and State levels, it has subdivided the state of Utah into five major event reporting areas. This would ensure that major events are more equally represented between rural and urban population areas by eliminating statistical anomalies that may occur in local areas. Statistically, events that exceed the threshold for major event day ("TMED") are a result of stresses beyond what is normally expected. RMP explains that capturing these events at a regional level would remove the statistical anomalies from these regions and provide a more consistent representation of the electric reliability at the State and local level. Second, RMP requests Service Quality Review reporting to reflect activities associated with RMP's Wildfire Mitigation Plan. RMP explains it has implemented an operational adjustment to the relay settings for protective devices to mitigate wildfire risk that may impact

¹ The PSC approved the current methodology for establishing major event thresholds in its May 30, 2013, Order in Docket No. 13-035-01.

reliability and therefore requests the impacts of this operational adjustment be excluded from underlying SAIDI values.²

The PSC also reviewed the comments filed by the Division of Public Utilities (DPU) on December 1, 2023 (“DPU Comments”). DPU comments that RMP’s January through June 2023 SAIDI, SAIFI, and CAIDI values seem to be within or below the revised control zone parameters approved by the PSC in Docket No. 20-035-22, on January 26, 2021. DPU compared RMP Utah’s annual SAIDI, SAIFI, and CAIDI (with and without MEDs) against RMP’s other operations by state and against other comparable investor-owned utilities. DPU comments RMP compares well and mostly outperforms PacifiCorp’s operations in other states and comparable utilities in SAIDI and SAIFI scores. Regarding CAIDI, DPU states RMP’s performance is closer to the average and that its CAIDI scores have remained fairly constant throughout the last 10 years. DPU states the Report complies with the PSC’s orders in Docket Nos. 08-035-55, 13-035-01, 15-035-72, and 20-035-22, and the requirements in Utah Admin. Code R746-313.³ DPU recommends the PSC approve RMP’s request to start calculating and reporting TMEDs for Utah by five geographic areas as long as it also includes statewide data reporting consistent with past practice and PSC orders. DPU also recommends the PSC approve RMP’s request to exclude service interruptions resulting from wildfire mitigation efforts in service reliability metrics in future reports but that any such interruptions also be tracked and reported separately in all future versions of this Report.

The PSC appreciates the DPU’s careful review of the Report. Based on the PSC’s review of the Report and the DPU’s comments and recommendations, the PSC acknowledges that the Report complies with the PSC orders, relevant rules, and the requirements in the relevant orders. The PSC also adopts as reasonable RMP’s reporting modifications. While reporting TMEDs by geographic area may provide a more consistent representation of the electric reliability at the State and local levels, the PSC directs RMP to also include statewide reporting consistent with past practice and PSC orders. In addition, the PSC acknowledges that RMP’s wildfire mitigation efforts, including the implementation of elevated fire risk settings, can have a negative impact to customer reliability. Therefore, it would be appropriate to exclude them

² The proposed change is described in detail in Section 1.6 under the section titled Elevated Fire Risk Settings Impact on Reliability.

³ DPU Comments, at 1 (referencing *In the Matter of the Service Quality Standards for Rocky Mountain Power*, Docket No. 08-035-55, Order issued June 11, 2009; *In the Matter of Rocky Mountain Power’s Proposed Utah Service Reliability Performance Baselines*, Docket No. 13-035-01 and *In the Matter of Rocky Mountain Power’s Service Quality Review Report*, Docket No. 15-035-72, Order Modifying Reliability Control Limits and Baseline Notification Levels, issued jointly on December 20, 2016; *Rocky Mountain Power’s Service Quality Review Report*, Docket No. 20-035-22, Order issued June 23, 2020; and, *Rocky Mountain Power’s Service Quality Review Report*, Docket No. 20-035-22, Order Modifying Reliability Control Limits and Baseline Notification Levels, issued January 26, 2021).

Acknowledgment Letter from the PSC

December 12, 2023

Docket No. 23-035-21

Page 3

from the reliability metrics for purposes of this Report. However, the PSC directs RMP to separately track such service interruptions in this Report by providing a link to its reporting thereof in its wildfire mitigation protection plans (“WFPP”), its WFPP compliance reports, or both.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

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