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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 Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

**Date:** April 26, 2024

**Re:** **Docket No. 24-035-16**, Rocky Mountain Power's 2024 Electrical Power Delivery Quality Plan

## Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission (Commission) acknowledge Rocky Mountain Power's (RMP) 2024 Electrical Power Delivery Quality Plan (Plan). The Division recommends the Commission combine the annual Power Quality Report with the Electric Power Delivery Quality Plan, which occurs in February of each year, with the Electric Power Delivery Quality Plan that is due by April 1<sup>st</sup> of every other year, respectively.

## Issue

On March 28, 2024, RMP filed its Plan with the Commission. On the same day, the Commission asked the Division to review RMP's Plan for compliance and make recommendations. The Commission asked the Division to report back by April 29, 2024. On March 29, 2024, the Commission issued its Notice of Filing and Comment Period asking any interested person to submit comments by April 29, 2024, and reply comments by May 20, 2024.

Division of Public Utilities

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## Background

HB 389 was enacted during the 2023 Legislative Session and memorialized in Utah Code Sections 54-25-101, 54-25-102, and 54-25-201, and as Administrative Code Rule R746-316. RMP's Electric Power Delivery Quality Plan<sup>1</sup> was initiated in response to Administrative Code Rule R746-316-1, which establishes requirements pertaining to the submission, review, and implementation of an Electric Power Delivery Quality Plan pursuant to Sections 54-25-101, 54-25-102, and 54-25, 201. Utah Administrative Code Rule 746-316-4, Review of an Electrical Power Delivery Quality Plan, promulgates the Commission's responsibility to issue a public notice of filing and comment period.

## Discussion

Utah Administrative Code (UAC) Rule R746-316-3, Submission of an Electrical Power Delivery Quality Plan, requires that a qualified utility must submit an electrical power delivery quality plan to the Commission before April 1, 2024, and biennially thereafter with subsequent plans before April 1<sup>st</sup> of each even-numbered year.<sup>2</sup>

UAC Rule R746-316-3(2) sets forth the required elements that must be included in the utility's electrical power delivery quality plan:

- a) a description of the metrics a qualified utility uses to assess Power Quality against applicable Industry Standards;
- b) a description of the equipment the qualified utility uses to assess Power Quality and to otherwise comply with this rule;
- c) a description of the procedures and standards the qualified utility will use to assess an interconnection request to decrease the risk that the interconnected utility-scale generation facility will adversely affect electrical power delivery quality to customers;
- d) a description of the procedures and standards the qualified utility will use to address adverse effects to electrical power service quality that are caused by interconnected customer-owned generation systems, including instances where the adverse effects are discovered after the time of interconnection; and
- e) a description of proposed modifications or upgrades to facilities and preventive programs the qualified utility will implement to address any electrical power delivery

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<sup>1</sup> Docket No. 24-035-16, *Rocky Mountain Power's Electric Power Delivery Quality Plan*, March 28, 2024, <https://pscdocs.utah.gov/electric/24docs/2403516/333094UtahElctclPwrDlvryQltyPlnApr12024Rprt3-28-2024.pdf>.

<sup>2</sup> Utah Administrative Code R746-316-3(1), *Submission of an Electric Power Delivery Quality Plan*.

quality issues that do not meet the qualified utility's interconnection policy or relevant Industry Standards.<sup>3</sup>

Further, UAC R746-316-5 requires a qualified utility to file a status report with the Commission regarding the qualified utility's implementation of its Electrical Power Delivery Quality Plan by October 1<sup>st</sup> each year.<sup>4</sup>

The Division has reviewed RMP's Plan with respect to Administrative Code Rule 746-316-3 and concludes that RMP's plan contains the required reporting elements. While the Division lacks sufficient expertise to fully vet the complex characteristics of the power quality elements RMP is proposing in its plan, it does understand the elements at a high level and the importance of their impacts on RMP's distribution and transmission system.

The Division notes that RMP relies on many Industry Standards to evaluate its own metrics. RMP relies on guidance from the Institute of Electrical and Electronics Engineers (IEEE), American National Standards Institute (ANSI), National Electric Manufacturers Association (NEMA), National Electric Code (NEC), and the Semiconductor Equipment and Materials Institute (SEMI-F47).<sup>5</sup> RMP complies with UAC R746-310-4, Station Instruments, Voltage and Frequency Restrictions and Station Equipment, as reported in Section 2, Equipment for Assessing Power Quality section of its Plan.<sup>6</sup> The Division is not familiar with the equipment listed and assumes RMP uses monitoring/metering equipment that effectively serves its needs. At the utility-scale level, RMP relies on PacifiCorp's Policy 139, which addresses the technical requirement for generation facilities, transmission facilities, and end-user facilities that are interconnected with PacifiCorp's transmission system.<sup>7</sup>

The Division concludes that RMP's Plan in this filing encompasses the majority if not all of the same topics including power quality issues mitigation (UAC R746-316-3(2)(e)) in its annual Power Quality Report filed on February 15, 2024 (Docket No. 24-035-06).<sup>8</sup> The

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<sup>3</sup> *Id.*, at paragraph (2).

<sup>4</sup> Docket No. 24-035-16, *Supra* note 2.

<sup>5</sup> Docket No. 24-035-16, *Supra* note 1, at page 4, PacifiCorp Engineering Handbook, *Power Quality Standards 1C.2.1, 1C.3.1, 1C.4.1, 1C.5.1, and 1C.6.1*.

<sup>6</sup> *Id.*, Section 2, *Equipment for Assessing Power Quality*, at page 10.

<sup>7</sup> *Id.*, Section 3, *Procedures and Standards for Assessing Utility-Scale Interconnections*, at page 11.

<sup>8</sup> Docket No. 24-035-06, *Rocky Mountain Power's Power Quality Report for 2023*, February 15, 2024, <https://pscdocs.utah.gov/electric/24docs/2403506/3324252023UPwrQltyRprt2-15-2024.pdf>.

Division filed comments in Docket No. 24-035-06 on March 18, 2024, recommending the Commission acknowledge RMP's annual report.<sup>9</sup> Even though the Plan in this filing is intended to be a biennial filing occurring on April 1<sup>st</sup> of even years, it makes sense to combine the Annual Power Quality Report into the Electric Power Delivery Quality Plan and rely on the October 1<sup>st</sup> annual status report for mid-Plan reporting. Therefore, the Division recommends the Commission combine the annual Power Quality Report and the Electric Power Delivery Quality Plan. This would save valuable resource time for RMP and others to prepare and review the two reports that are seemingly the same in context with varying reporting requirements.

The Division appreciates RMP's compilation of the many elements that contribute to power quality at both the distribution and transmission level. As more and more distributed energy resources are interconnected at the distribution level from customer-owned generation and utility-scale resources, along with load and other factors, power quality is rapidly becoming significantly important for system reliability and delivery of quality power to RMP's customers. While the Division does not have any recommendations at this time other than those reported above, it looks forward to future reports and metrics. The Division concludes that RMP's initial Plan includes the requirements set forth in UAC R746-316. The Division recognizes that RMP's Plan in this filing is its first and may change going forward.

## **Conclusion**

The Division reviewed Rocky Mountain Power's 2024 Electrical Power Delivery Quality Plan and determined that it reflects the Utah Administrative Code Rule R746-316-3. Therefore, the Division recommends the Commission acknowledge RMP's Plan.

The Division recommends the Commission combine the annual Power Quality Report with the Electric Power Delivery Quality Plan, which occurs in February of each year, with the Electric Power Delivery Quality Plan that is due by April 1<sup>st</sup> of every other year, respectively.

cc: Jana Saba, RMP  
Michele Beck, OCS  
Service List

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<sup>9</sup> Docket No. 24-035-06, *Comments from the Division of Public Utilities*, March 18, 2024, <https://pscdocs.utah.gov/electric/24docs/2403506/332917DPUCmnts3-18-2024.pdf>.