
Rocky Mountain Power's 2024 Electrical
Power Delivery Quality Plan

DOCKET NO. 24-035-16

ORDER APPROVING ROCKY MOUNTAIN
POWER'S 2024 ELECTRICAL POWER
DELIVERY QUALITY PLAN

ISSUED: June 19, 2024

I. BACKGROUND

On March 28, 2024, Rocky Mountain Power (RMP) filed its 2024 Electrical Power Delivery Quality Plan ("2024 Plan") with the Public Service Commission (PSC) in compliance with Utah Code §§ 54-25-101, -102, and -201¹ and Utah Admin. Code R746-316, *et seq.*²

The PSC issued a notice of filing and comment period ("Notice") on March 29, 2024.

The Division of Public Utilities (DPU) filed comments on April 26, 2024 ("DPU Comments").

RMP filed reply comments on May 20, 2024 ("RMP Reply Comments"). No other comments were filed.

¹ Enacted in 2023, the Electrical Power Delivery Quality Act ("Act") requires certain utilities to file an Electrical Power Delivery Quality Plan ("Plan") with the PSC.

² The PSC adopted Utah Admin. Code R746-316, *et seq.*, Electrical Power Delivery Quality Plans (the "Rule") pursuant to the Act. The Rule sets forth requirements pertaining to the submission (*see* R746-316-3), review (R746-316-4), and implementation of any Plan filed pursuant to the Act (R746-316-5). Subsection 3 of the Rule requires a qualified utility to (1) submit a Plan to the PSC on or before April 1, 2024, and biennially thereafter with subsequent Plans due on or before April 1 of each even-numbered year (the "Plan Filing Schedule") and (2) sets forth the required elements of each Plan ("Required Plan Elements"). Subsection 5 requires a qualified utility to file a status report regarding the implementation of any Plan filed in accordance with the Rule ("Status Report").

II. THE PLAN

RMP represents the 2024 Plan complies with the Act. The 2024 Plan is categorized into five general sections:

Section (1) explains the metrics RMP uses to assess power quality. RMP assesses voltage sag, steady-state voltage, light flicker, and harmonic distortions against industry standards.

Section (2) summarizes the equipment RMP uses to assess power quality, including monitor and meter types and their respective accuracy ratings.

Section (3) details the procedures and standards RMP uses to assess utility-scale interconnections to decrease the risk that the interconnected utility-scale generation facility will adversely affect electrical power delivery quality to customers. RMP explains its Policy 139 addresses the technical requirements for generation, transmission, and end-user facilities interconnection with PacifiCorp's transmission system. This policy seeks to ensure RMP avoids adverse reliability/power quality impacts to the transmission system. Section (3) also provides for other technical studies not described in RMP's Policy 139.

Section (4) contains procedures and standards RMP uses to address adverse effects to power service quality that are caused by interconnected customer-owned generation systems. These may include power quality investigations or other technical studies.

Section (5) describes preventive programs, such as power quality monitoring, and any proposed electric facilities modifications or upgrades.

III. COMMENTS AND REPLY COMMENTS

DPU states the 2024 Plan contains the Required Plan Elements. DPU explains the Plan's topics overlap substantially with RMP's annual Power Quality Report topics.³ While the Plan is intended to be a biennial filing that occurs on April 1st of

³ See Docket No. 22-035-34, *RMP's Request to Establish Reporting for Power Quality*; Docket No. 24-035-06, *RMP's Power Quality Report for the Period of January through December 2023*.

even years, DPU reasons it would be administratively more efficient to combine the annual Power Quality Reports into the Plan and rely on the October 1st annual Status Report for mid-Plan reporting.⁴ DPU recommends the PSC acknowledge that RMP's Plan complies with the Rule.

In Reply Comments, RMP agrees with DPU's observation on the apparent informational overlap between the Plan and annual Power Quality Reports. RMP posits it is likely the two administrative processes could be combined in future reporting in a manner that more efficiently meets all requirements. RMP notes the reporting requirements were established through different processes that encompass disparate stakeholders — the Power Quality Report established in Docket No. 22-035-34 was developed in collaboration with various stakeholders and the Plan through the legislative process. Accordingly, RMP states it will develop a proposal to combine the reports in a manner that preserves their respective intended purposes and ensures adequate opportunity for stakeholders to submit comments. RMP recommends presenting its proposal for consideration by the PSC, DPU, and affected stakeholders on February 15, 2025, as part of its Power Quality Report.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

Based on RMP's filing, comments and recommendations from DPU, and RMP's Reply Comments, and there being no opposition, we find and conclude the Plan

⁴ DPU Comments at 4.

complies with the Rule. Furthermore, we find RMP's request to present a proposal that merges the Plan with annual power quality reporting to enhance administrative efficiency is in the public interest and therefore we approve it.

V. ORDER

Based on the findings and conclusions above:

1. The PSC approves RMP's 2024 Plan.
2. RMP shall file its proposal to consolidate reporting requirements, as discussed in this Order, on or by February 15, 2025, as part of its 2025 Annual Power Quality Report.

DATED at Salt Lake City, Utah, June 19, 2024.

/s/ Michael J. Hammer
Presiding Officer

Approved and Confirmed June 19, 2024, as the Order of the Public Service
Commission of Utah.

/s/ Jerry D. Fenn, Chair

/s/ David R. Clark, Commissioner

/s/ John S. Harvey, Ph.D., Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#334336

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this written order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on June 19, 2024, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

Data Request Response Center (datareq@pacificorp.com, utahdockets@pacificorp.com)
PacifiCorp

Jana Saba (jana.saba@pacificorp.com)
Carla Scarsella (carla.scarsella@pacificorp.com)
Rocky Mountain Power

Patricia Schmid (pschmid@agutah.gov)
Patrick Grecu (pgrecu@agutah.gov)
Robert Moore (rmoore@agutah.gov)
Assistant Utah Attorneys General

Madison Galt (mgalt@utah.gov)
Division of Public Utilities

Alyson Anderson (akanderson@utah.gov)
Bela Vastag (bvastag@utah.gov)
Alex Ware (aware@utah.gov)
Jacob Zachary (jzachary@utah.gov)
(ocs@utah.gov)
Office of Consumer Services

Administrative Assistant