



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Public Service Commission

JERRY D. FENN
Chair

DAVID R. CLARK
Commissioner

JOHN S. HARVEY, Ph.D.
Commissioner

April 30, 2025

Mr. Max Backlund
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

Re: *Rocky Mountain Power's Power Quality Report for the Period of January through December 2024, Docket No. 25-035-09*

Dear Mr. Backlund,

The Public Service Commission (PSC) has reviewed Rocky Mountain Power's (RMP) power quality ("PQ") report filed on February 10, 2025 for the January through December 2024 period (the "2024 PQ Report").¹ The 2024 PQ Report identifies the quantity and sources of voltage disturbances, primarily voltage sags, observed at 46-345 kV RMP substations in various Utah locations. Additionally, in accordance with the PSC's Order Approving RMP's 2024 Electrical Power Delivery Quality Plan issued on June 19, 2024, in Docket No. 24-035-16² ("Order") and the Division of Public Utilities' (DPU) recommendation, RMP proposes to combine the PQ Reports and PQ Plan Status Reports³ to maximize efficiency and resources since the two reports contain similar information and are duplicative ("Proposal").

¹ The PSC approved the reporting template ("Reporting Template") in Docket No. 22-035-34, *Rocky Mountain Power's Request to Establish Reporting for Power Quality*.

² The Electrical Power Delivery Quality Act ("Act") was enacted in 2023 and requires certain utilities to file an Electrical Power Delivery Quality Plan ("Plan") with the PSC. See Utah Code Ann. §§ 54-25 *et seq.*

³ 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 and (2) sets forth the required elements of each Plan. Subsection 5 requires a qualified utility to

RMP states it will file its first PQ Plan Status Report for calendar year 2024 on October 1, 2025. Beginning with the PQ Plan Status Report to be filed October 1, 2026, the PQ Plan Status Reports will include the following information from the PQ Reports: (a) for voltage sag events below the SEMI-F47 curve: cause, location, duration, and all monitors impacted by the same voltage sag event; and (b) individual SEMI-F47 curves for each monitoring site. According to the Proposal, the PQ Report will no longer be filed on February 15 and instead the equivalent information will be subsumed into the PQ Plan Status Reports filed on October 1. Figures 1 and 2 included with the 2024 PQ Report, reproduced below, show the proposed timing changes applicable to these PQ Reports and PQ Plan Status Reports.

Figure 1 – Current Timing of Reports

CY	Report Filing Date		
	February 15	April 1	October 1
2024	Power Quality Report (Reporting Period CY 2023)	Power Quality Plan	
2025	Power Quality Report (Reporting Period CY 2024)		Power Quality Plan Status Report (Reporting Period CY 2024)
2026	Power Quality Report (Reporting Period CY 2025)	Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2025)
2027	Power Quality Report (Reporting Period CY 2026)		Power Quality Plan Status Report (Reporting Period CY 2026)
2028	Power Quality Report (Reporting Period CY 2027)	Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2027)
2029	Power Quality Report (Reporting Period CY 2028)		Power Quality Plan Status Report (Reporting Period CY 2028)
2030	Power Quality Report (Reporting Period CY 2029)	Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2029)

Figure 2 – Revised Timing of Reports

CY	Report Filing Date		
	February 15	April 1	October 1
2024	Power Quality Report (Reporting Period CY 2023)	Power Quality Plan	
2025	Power Quality Report (Reporting Period CY 2024)		Power Quality Plan Status Report (Reporting Period CY 2024)
2026		Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2025)
2027			Power Quality Plan Status Report (Reporting Period CY 2026)
2028		Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2027)
2029			Power Quality Plan Status Report (Reporting Period CY 2028)
2030		Power Quality Plan	Power Quality Plan Status Report (Reporting Period CY 2029)

RMP comments that the 2024 PQ Report results from a collaboration with DPU, the Office of Consumer Services, the Utah Association of Energy Users, the Utah Petroleum Association, the Utah Mining Association, and Clean Harbors Aragonite Inc. (“Collaborative”); therefore, RMP is open to feedback from these parties or any stakeholder to ensure the information provided through the Proposal aligns with the original intent of the reporting.

The PSC also reviewed DPU's comments filed on March 14, 2025 (“DPU Comments”). No other party filed comments or reply comments. DPU comments that RMP has 43 monitoring points and plans to add 31 new monitoring points in 2025. According to DPU, RMP's monitors captured 127 total events, 85 unique voltage sag events, and 70 events from new meters. RMP reports this year's unique voltage sag events are a 14.9% increase over 2023, and approximately 55% of this year's reported

file a status report regarding the implementation of any Plan filed in accordance with the Rule (“PQ Plan Status Report”).

unique sag events are purportedly the result of the new meters. DPU observes 38 main event causes during 2024, a year-over-year improvement from 45 major event causes RMP reported in the 2023 PQ Report. DPU states it has ongoing concerns with the number of events occurring below the SEMI-F47 line, particularly events lasting between 1 and 10 seconds and intends to monitor the curves and the attendant event causes in future years to develop a baseline before offering any future recommendations. While the PQ Report Template contemplates only voltage sags, DPU comments the PSC may wish to require reporting voltage spikes in future PQ Reports to provide a more comprehensive view of variations that could affect customers' service and equipment.

DPU also supports RMP's Proposal in order to maximize efficiency and resources. DPU recommends the PSC acknowledge RMP's Report and approve RMP's Proposal.

Based on the PSC's review of the 2024 PQ Report, DPU's Comments, and there being no opposition, the PSC acknowledges the 2024 PQ Report adheres to the Reporting Template. Further, given RMP's representations in the 2024 PQ Report, DPU's support, and there being no opposition, we approve RMP's Proposal. Without further input from RMP, the Collaborative, or other stakeholders, and given no reply comments were filed, we decline to require the inclusion of voltage spikes in the PQ Reports at this time.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#339548