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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: June 2, 2025

Re: **Docket No. 25-035-29**, Rocky Mountain Power's Service Quality Report for the Period January through December 2024

Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Rocky Mountain Power's (RMP) January 1, 2024, through December 31, 2024, Service Quality Review Report (Report). The current report complies with all prior Commission Orders¹²³⁴ and complies with the requirements of Utah Administrative Code R746-313.

Issue

On May 1, 2025, RMP filed its Report with the Commission for the 2024 reporting period. On the same day, the Commission asked the Division to review RMP's filing for compliance and make recommendations by May 30, 2025. On May 2, 2025, the Commission issued its

¹ *Commission Order*, Docket No. 08-035-55, June 11, 2009, <https://pscdocs.utah.gov/electric/08docs/0803555/62486Order%5bDOCKETED%5d.pdf>.

² *Commission Order*, and Docket No. 13-035-01, *Commission Order*, Docket No. 08-035-55, December 20, 2016, <https://pscdocs.utah.gov/electric/13docs/1303501/2908801303501and1503572omrclabnl12-20-2016.pdf>

³ *Commission Order*, Docket 15-035-72, December 20, 2016, <https://pscdocs.utah.gov/electric/13docs/1303501/2908801303501and1503572omrclabnl12-20-2016.pdf>

⁴ *Commission Orders*, Docket No. 20-035-22, 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>.



Notice of Filing and Comment Period asking any interested person to file comments by June 2, 2025.

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, 2024, Report in light of the Commission's Orders in Docket Nos. 08-035-55, 13-035-01, 15-035-72, and 20-035-22, Utah Administrative Code, and the Utah Service Quality Review Work Group Report filed with the Commission on September 13, 2006.⁷ The Division notes that the 2024 SAIDI and SAIFI

⁵ *Rocky Mountain Power's Service Quality Review Report for January through December of 2022* Docket No. 23-035-21, May 1, 2023, at 3, <https://pscdocs.utah.gov/electric/23docs/2303521/327830RMPSvcQltyRvwRprtCY20225-1-2023.pdf>.

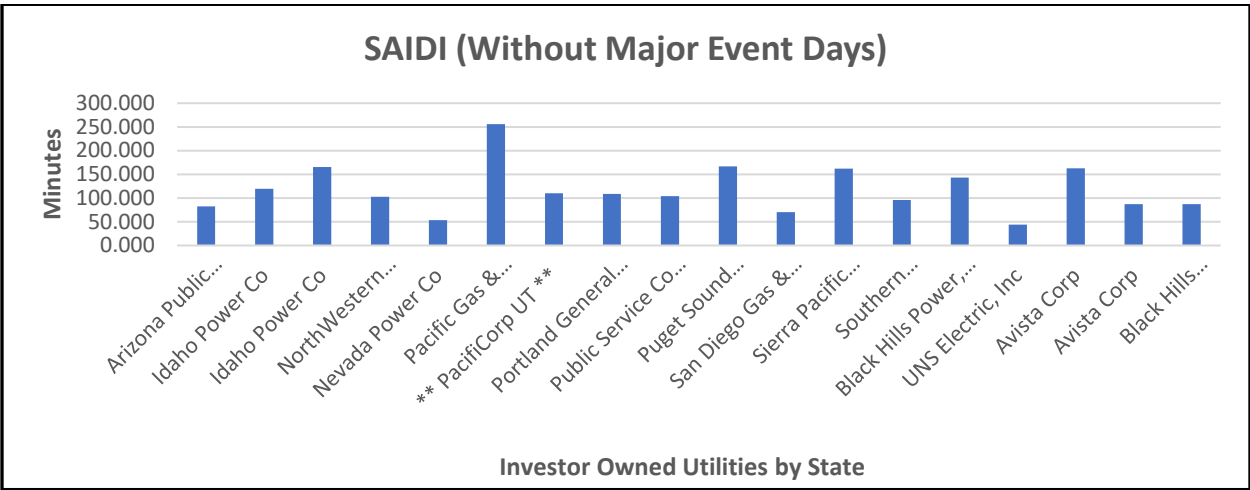
⁶ *Id.*

⁷ *Division Memorandum*, Docket No. 20-035-22, 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

values are within the revised control zone parameters approved by the Commission in Docket No. 20-035-22. RMP’s reliability metrics continue to improve year-over-year.⁸

Charts 1 through 3 illustrate that PacifiCorp’s Utah, SAIDI, SAIFI, and CAIDI (without major event days) metrics per the U.S. Energy Information Administration (EIA) perform on average to its peer utilities in the western part of the country for non-major event days. The Division notes that results reported through EIA and the PacifiCorp reports submitted by RMP show some differences for unknown reasons. Chart 1 illustrates that PacifiCorp’s Utah EIA SAIDI metric, without major event days, is just over 109 minutes for 2023.⁹ RMP’s reported SAIDI metrics for 2023 and 2024 are 98, and 93, respectively.¹⁰ The Division notes that peer-to-peer comparisons are difficult given the delay in useful data from reporting agencies. Nevertheless, it can reveal year-over-year trends. 2024 EIA data is not available for this year’s report.

Chart 1



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.

⁹ U.S. Energy Information Administration (EIA), *Annual Electric Power Industry Report – Reliability for 2023*, <https://www.eia.gov/electricity/annual/#eleven>.

¹⁰ *Rocky Mountain Power’s Service Quality Report for the Period January through December 2024*, Docket No. 25-035-29, May 1, 2025 at 11 of 44, <https://pscdocs.utah.gov/electric/25docs/2503529/339571RMP2024SrvCQtyRvwRprt5-1-2025.pdf>.

Chart 2 illustrates the same industry metrics for SAIFI. Chart 2 illustrates that PacifiCorp’s Utah SAIFI metric, without MED, is 0.65 minutes per interruption for 2023 (EIA industry data for western utilities).¹¹ RMP’s reported SAIFI metrics for 2023 and 2024 are 0.8, and 0.8, respectively.¹²

Chart 2

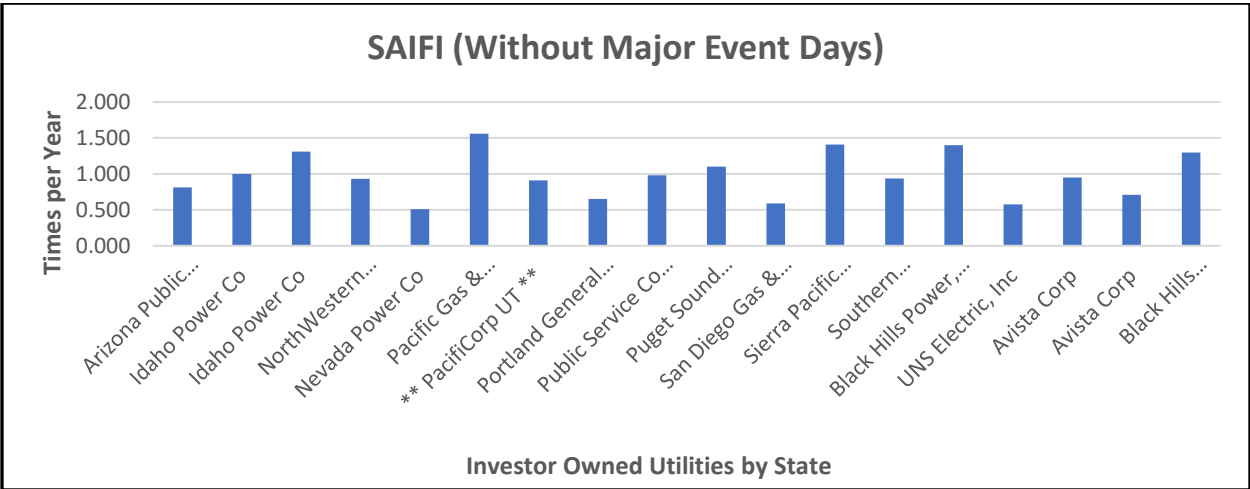
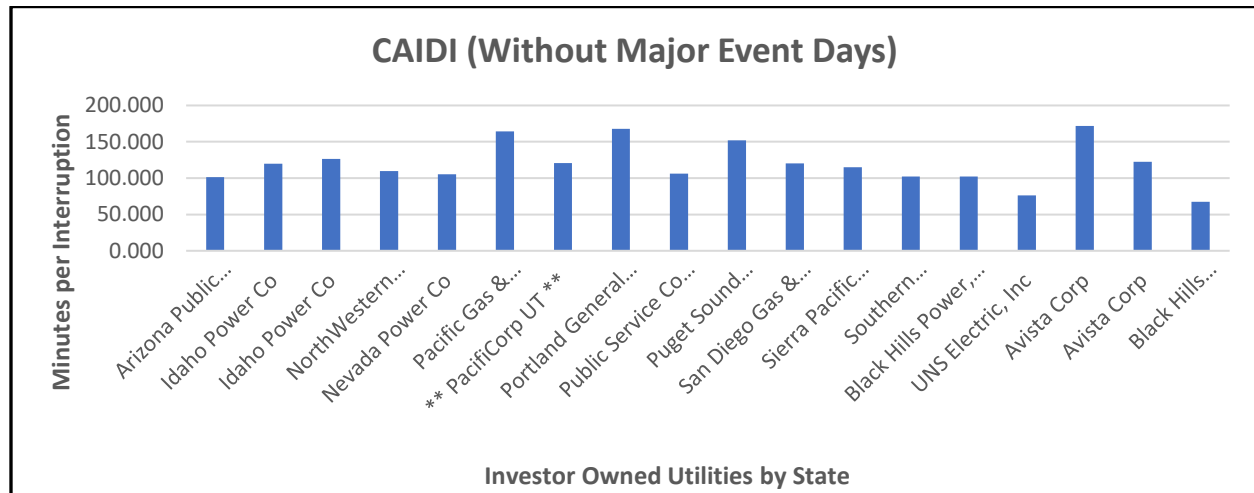


Chart 3 illustrates the same industry metric for CAIDI. PacifiCorp’s Utah CAIDI metric, without MED, is 121 minutes per interruption for 2023 (EIA industry data for western utilities).¹³ RMP’s reported CAIDI metrics for 2023 and 2024 are 125 and 118 minutes, respectively.¹⁴

¹¹ Docket No. 25-035-29, *supra* note 9.
¹² Docket No. 25-035-29, *supra* note 10.
¹³ Docket No. 25-035-29, *supra* note 9.
¹⁴ Docket No. 25-035-29, *supra* note 10.

Chart 3



Equipment failures continue to be the largest contributor to SAIDI and SAIFI. RMP reports that equipment failures contributed 37% to the underlying SAIDI cause analysis for 2024. There was no change from 2023. RMP reports that equipment failures contributed 25% to the underlying SAIFI cause analysis for 2024. There was a slight improvement from the 28% reported for 2023. RMP reports that equipment failures contributed 45% to underlying incidents compared to 50% for 2023, a year-over-year improvement.¹⁵ This year's report adds cause analysis for elevated fire risk (EFR) metrics. Equipment failure relating to EFR for SAIDI, SAIFI, and underlying incidents is 18%, 12%, and 21%, respectively.¹⁶

The Division recognizes RMP's efforts in its continuation to reduce SAIDI values through its Mainline Sectionalizing (MLS) plan.¹⁷ 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 approximately the same amount of

¹⁵ Docket No. 25-035-29, *supra* note 10, *SAIDI, SAIFI, and Cause Analysis - Underlying Incidents*, at 18-19 of 44.

¹⁶ *Id.* at 20-21 of 44.

¹⁷ *Rocky Mountain Power's Service Quality Review Report*, Docket No. 22-035-14, November 1, 2022, at 15.

capital spending and new connections, excluding gateway transmission and local transmission reinforcements, since reported in 2022.¹⁸

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.¹⁹ Table 1 illustrates outages due to equipment related failure trends for the industry, though it is notably inconclusive based on peer-to-peer system comparisons, timing, and other factors.²⁰

¹⁸ Docket No. 23-035-21, *supra* note 5, at 23-24.

¹⁹ PAPUC - Electric Service Reliability Report, https://www.puc.pa.gov/media/3123/draft-2024-electric-reliability-report-8-2024_final.pdf, ²NY Department of Public Service, <https://dps.ny.gov/system/files/documents/2024/09/70923690-0000-c613-bf9e-41b85aab90b2.pdf>,

³Montana-Dakota Utilities Co. Subsidiary of MDU, https://psc.mt.gov/_docs/Reports/Electric-Reliability/2024/2024_MDU_Electric_Reliability_Report.pdf, and ⁴NorthWestern Energy NorthWestern Energy (avg of multiple systems), https://psc.mt.gov/_docs/Reports/Electric-Reliability/2023/2023-NWE-Electric-Reliability-Report.pdf.

²⁰ 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 are a percentage of total underlying root causes and at least establishes a baseline comparison.

Table 1

Underlying Equipment Failures Percentage			
Utility	State	2022	2023
Duquesne Light Company ¹	PA	22%	23%
PECO Energy Company ¹	PA	40%	32%
PPL Electric Utilities Corporation ¹	PA	24%	20%
Metropolitan Edison Company ¹	PA	21%	17%
Pennsylvania Electric Company ¹	PA	19%	16%
Pennsylvania Power Company ¹	PA	17%	10%
West Penn Power Company ¹	PA	29%	12%
Citizens' Electric Company ¹	PA	12%	21%
Pike County Light & Power Company ¹	PA	30%	6%
UGI Utilities Inc ¹	PA	15%	14%
Wellsboro Electric Company ¹	PA	15%	11%
Con Edison ²	NY	78%	70%
National Grid ²	NY	28%	27%
NYSEG ²	NY	16%	15%
RG&E ²	NY	20%	21%
Cental Hudson ²	NY	17%	17%
Orange & Rockland ²	NY	29%	28%
PSEG-LP ²	NY	56%	49%
Montana-Dakota Utilities Co. ³	MT	12%	10%
NorthWestern Energy ⁴	MT	26%	22%
Rocky Mountain Power (w/o Enhanced Safety Settings)	UT	49%	45%
Average		27%	23%
Median		22%	20%

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 monitors RMP's customer response performance in answering calls within 30 seconds. RMP reports the customer response performance for 2024 at 78%,²¹ which is an improvement over that reported for 2023 at 76%. RMP's goal is 80%. As with past reports, RMP states that insufficient staffing is the reason for the low response time and continues to fill open positions at its call center. While customer response time does not fall under Rule 25 customer guarantees, it is a customer satisfaction performance standard that RMP offers to its customers. The Division will continue to monitor this metric and report any findings to

²¹ Docket No. 25-035-29, *supra* note 10, at 23 of 44.

the Commission with recommendations to enforce this performance standard to meet RMP's 80% goal.

Overall, the Division concludes that RMP is putting forth efforts to improve its customer service and reliability.

Conclusion

The Division concludes that RMP is following the Commission's Orders and Rules, and recommends that the Commission acknowledge RMP's January 1, 2024, through December 31, 2024, Service Quality Review Report.

cc: Jana Saba, RMP
Max Backlund, RMP
Michele Beck, OCS