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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  
Thomas Allred, Utility Analyst

**Date:** December 1, 2025

**Re:** **Docket No. 25-035-29**, Rocky Mountain Power's Service Quality Report for the Period January through June 2025

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Rocky Mountain Power's (RMP) January 1, 2025, through June 30, 2025, Service Quality Review Report (Report). The current report complies with all prior Commission Orders<sup>1234</sup> and complies with the requirements of Utah Administrative Code R746-313.

## Issue

On October 30, 2025, RMP filed its Report with the Commission. On the same day, the Commission asked the Division to review RMP's filing for compliance and make recommendations by December 1, 2025.

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

<sup>2</sup> *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>

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

<sup>4</sup> *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>.



## 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.<sup>5</sup>

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 (System Average Interruption Duration Index) and SAIFI (System Average Interruption Frequency Index) 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.<sup>6</sup>

## Discussion

In accordance with the Commission's Notice of Filing and Comment Period, the Division reviewed RMP's January 1 through June 30, 2025, 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.<sup>7</sup> The Division notes that the 2025 SAIDI and SAIFI

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<sup>5</sup> *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/2303521/327830RMPsRvcQltyRvwRprtCY20225-1-2023.pdf>.

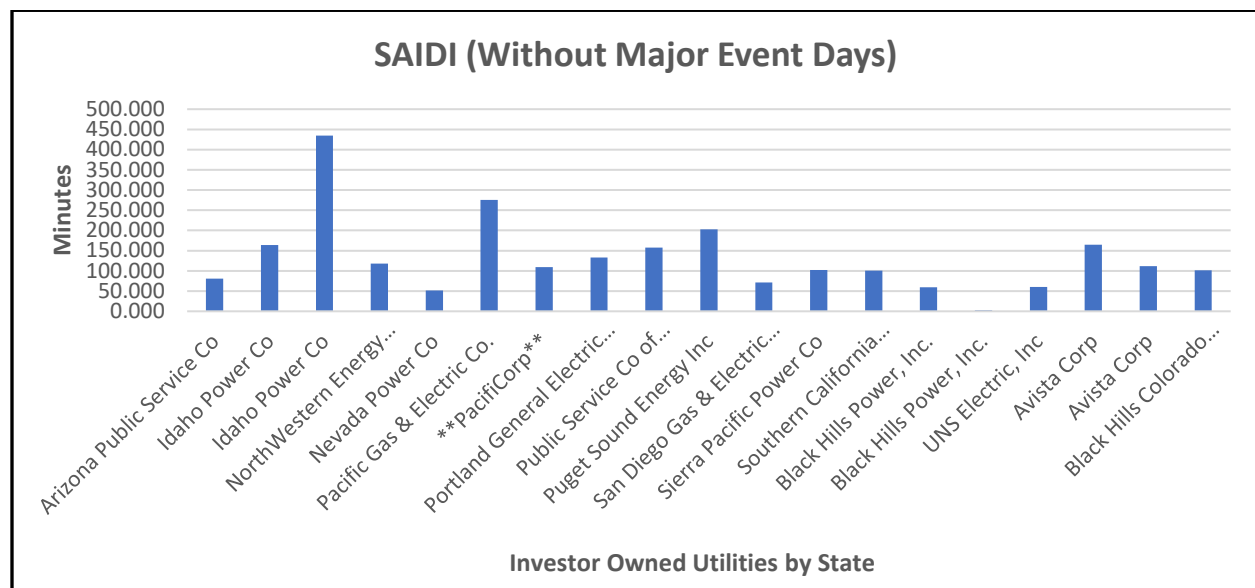
<sup>6</sup> Id.

<sup>7</sup> *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 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>.

values for the first half of 2025 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.<sup>8</sup>

Charts 1 through 3 illustrate how PacifiCorp's Utah, SAIDI, SAIFI, and CAIDI (Customer Average Interruption Duration Index) metrics compare 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 100 minutes for 2024.<sup>9</sup> RMP's reported SAIDI metrics for 2024 and 2025 (1<sup>st</sup> half) are 93, and 44, respectively.<sup>10</sup> 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.

**Chart 1**



<sup>8</sup> Docket No. 23-035-21, *supra* note 5, at 4-8.

<sup>9</sup> U.S. Energy Information Administration (EIA), *Annual Electric Power Industry Report – Reliability for 2024*, <https://www.eia.gov/electricity/annual/#eleven>.

<sup>10</sup> *Rocky Mountain Power's Service Quality Report for the Period January through June 2025*, Docket No. 25-035-29, October 30, 2025 at 11 of 41, <https://pscdocs.utah.gov/electric/25docs/2503529/342494RMPSrvCQtyRprtJanJune%20202510-30-2025.pdf>.

Chart 2 illustrates the same industry metrics for SAIFI. Chart 2 illustrates that PacifiCorp’s Utah SAIFI metric, without MED, is 1.00 minutes per interruption for 2024 (EIA industry data for western utilities).<sup>11</sup> RMP’s reported SAIFI metrics for 2024 and 2025 (1<sup>st</sup> half) are 0.8, and 0.37, respectively.<sup>12</sup>

Chart 2

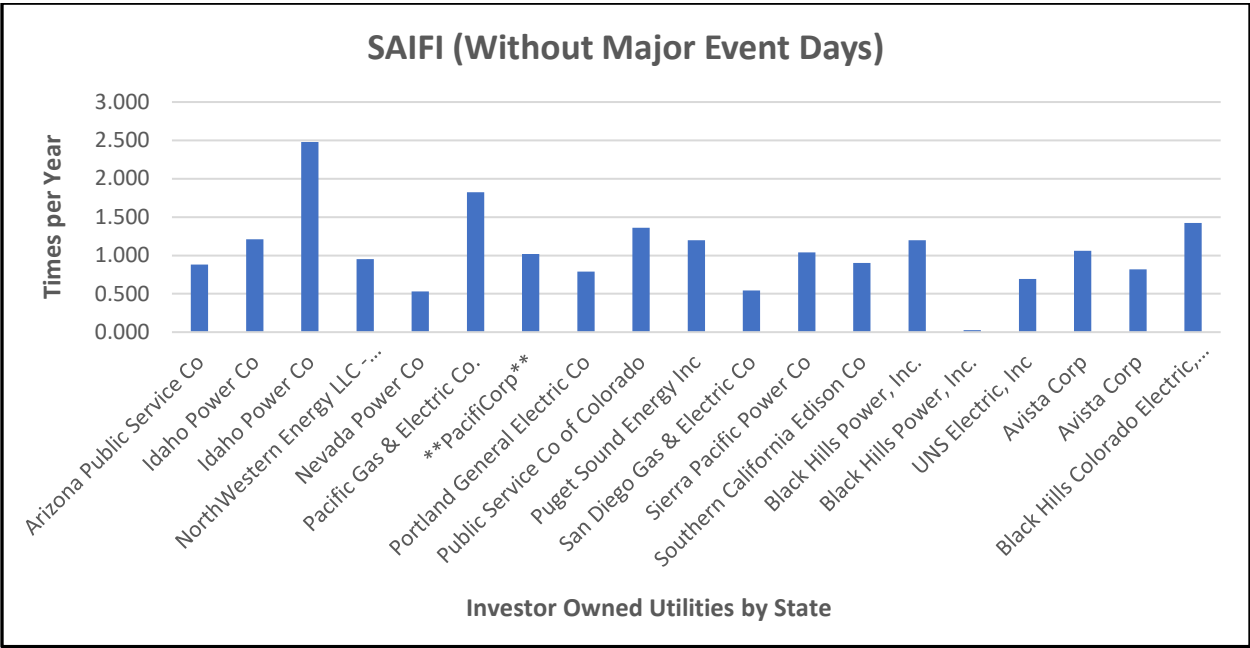
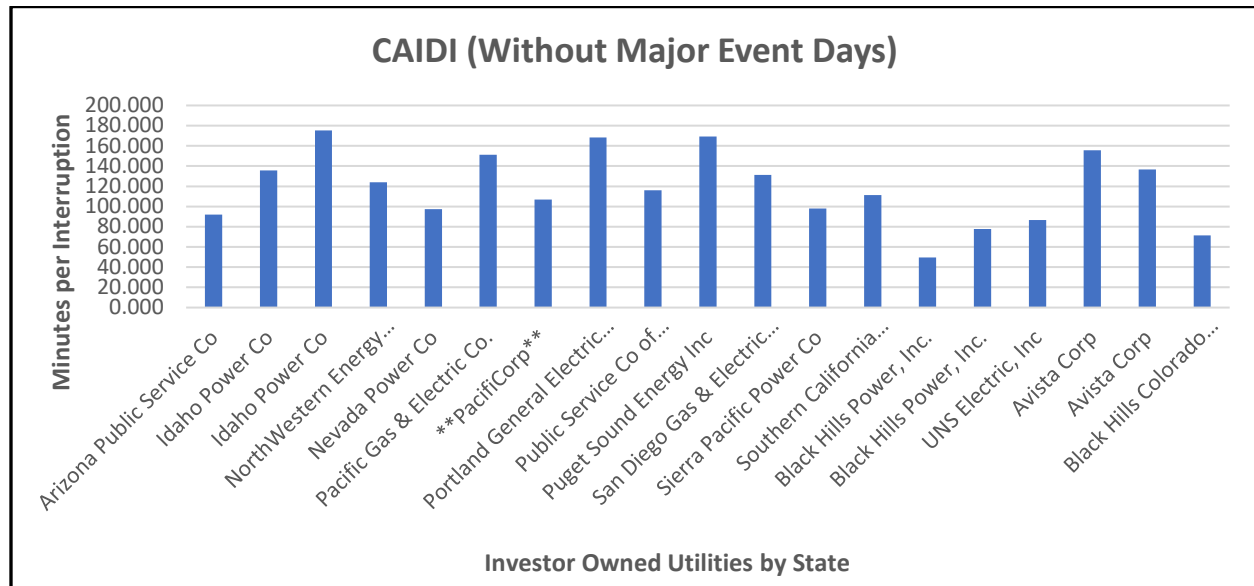


Chart 3 illustrates the same industry metric for CAIDI. PacifiCorp’s Utah CAIDI metric, without MED, is just over 100 minutes per interruption for 2024 (EIA industry data for western utilities).<sup>13</sup> RMP’s reported CAIDI metrics for 2024 and 2025 (1<sup>st</sup> half) are 118 and 120 minutes, respectively.<sup>14</sup>

<sup>11</sup> Docket No. 25-035-29, *supra* note 9.  
<sup>12</sup> Docket No. 25-035-29, *supra* note 10.  
<sup>13</sup> Docket No. 25-035-29, *supra* note 9.  
<sup>14</sup> 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 37.4% to the underlying SAIDI cause analysis for 2025 (1<sup>st</sup> half) demonstrating minimal change from 2024's full report. RMP reports that equipment failures contributed 26.5% to the underlying SAIFI cause analysis for 2025 (1<sup>st</sup> half), a slight uptick from the 25% reported for 2024's full report. RMP reports that equipment failures contributed 51.3% to underlying sustained incidents compared to 45% for 2024's full report.<sup>15</sup> Equipment failures relating to Enhanced Safety Settings (ESS) for 2025 (1<sup>st</sup> half) SAIDI and SAIFI, and sustained underlying incidents is 15.8%, 17.6%, and 25.5%, respectively.<sup>16</sup>

The Division recognizes RMP's efforts in its continuation to reduce SAIDI values through its Mainline Sectionalizing (MLS) plan.<sup>17</sup> 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

<sup>15</sup> Docket No. 25-035-29, *supra* note 10, *SAIDI, SAIFI, and Cause Analysis - Underlying Incidents*, at 18 of 41.

<sup>16</sup> *Id.* at 19-20 of 41.

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

distribution events) to the SAIDI and SAIFI metrics given approximately the same amount of capital spending and new connections, excluding gateway transmission and local transmission reinforcements, since reported in 2022.<sup>18</sup>

The Division continues to gain a better understanding of equipment failures related to the underlying causes for the SAIDI and SAIFI metrics reported by RMP each year by compiling a peer-to-peer comparison across the industry.<sup>19</sup> Table 1 illustrates outages due to equipment related failure trends for the industry, though its usefulness may be limited based on challenges with peer-to-peer system comparisons, timing, and other factors.<sup>20</sup>

**Table 1**

| <b>Underlying Equipment Failures Percentage</b>            |              |             |             |
|--|--------------|-------------|-------------|
| <b>Utility</b>   | <b>State</b> | <b>2023</b> | <b>2024</b> |
| Duquesne Light Company <sup>1</sup>                        | PA           | 23%         | 21%         |
| PECO Energy Company <sup>1</sup>                           | PA           | 32%         | 33%         |
| PPL Electric Utilities Corporation <sup>1</sup>            | PA           | 20%         | 16%         |
| Metropolitan Edison Company <sup>1</sup>                   | PA           | 17%         | 16%         |
| Pennsylvania Electric Company <sup>1</sup>                 | PA           | 16%         | 16%         |
| Pennsylvania Power Company <sup>1</sup>                    | PA           | 10%         | 9%          |
| West Penn Power Company <sup>1</sup>                       | PA           | 12%         | 12%         |
| Citizens' Electric Company <sup>1</sup>                    | PA           | 21%         | 22%         |
| Pike County Light & Power Company <sup>1</sup>             | PA           | 6%          | 17%         |
| UGI Utilities Inc <sup>1</sup>                             | PA           | 14%         | 14%         |
| Wellsboro Electric Company <sup>1</sup>                    | PA           | 11%         | 10%         |
| Con Edison <sup>2</sup>                                    | NY           | 70%         | 74%         |
| National Grid <sup>2</sup>                                 | NY           | 27%         | 26%         |
| NYSEG <sup>2</sup>   | NY           | 15%         | 16%         |
| RG&E <sup>2</sup>  | NY           | 21%         | 24%         |
| Central Hudson <sup>2</sup>                                | NY           | 17%         | 17%         |
| Orange & Rockland <sup>2</sup>                             | NY           | 28%         | 30%         |
| PSEG-LI <sup>2</sup>                                       | NY           | 49%         | 48%         |
| Montana-Dakota Utilities Co. <sup>3</sup>                  | MT           | 10%         | 17%         |
| NorthWestern Energy <sup>4</sup>                           | MT           | 22%         | 18%         |
| <b>Rocky Mountain Power (w/o Enhanced Safety Settings)</b> | <b>UT</b>    | <b>45%</b>  | <b>51%</b>  |
| <b>Average</b>   |              | <b>23%</b>  | <b>24%</b>  |
| <b>Median</b>  |              | <b>20%</b>  | <b>17%</b>  |

<sup>18</sup> Docket No. 23-035-21, *supra* note 5, at 23-24.

<sup>19</sup> PAPUC - Electric Service Reliability Report, [https://www.puc.pa.gov/media/3565/24\\_electric-reliability-report\\_final.pdf](https://www.puc.pa.gov/media/3565/24_electric-reliability-report_final.pdf), <sup>2</sup>NY Department of Public Service, <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=B0056597-0000-C149-A13C-FCA9758F4D01>, <sup>3</sup>Montana-Dakota Utilities Co. Subsidiary of MDU, [https://psc.mt.gov/docs/Reports/Electric-Reliability/2024/2024\\_MDU\\_Electric\\_Reliability\\_Report.pdf](https://psc.mt.gov/docs/Reports/Electric-Reliability/2024/2024_MDU_Electric_Reliability_Report.pdf), and

<sup>4</sup> NorthWestern Energy NorthWestern Energy (avg of multiple systems), [https://psc.mt.gov/docs/Reports/Electric-Reliability/2024/2024\\_NWE\\_Electric\\_Reliability\\_Report.pdf](https://psc.mt.gov/docs/Reports/Electric-Reliability/2024/2024_NWE_Electric_Reliability_Report.pdf).

<sup>20</sup> 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.

The Division continues to collect data for equipment-related failures on a peer-to-peer basis across the industry in an attempt to develop a trend to inform limits 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 has not tracked RMP's equipment failures for a substantial amount of time, but RMP does not appear to be making much of an attempt to improve its equipment failure metrics. In consideration of the increasing task of maintaining system reliability and power quality with complex load requirements, the Division would expect RMP to put forth more effort in improving its equipment reliability or at least explain in more thorough detail its challenges in doing so.

The Division monitors RMP's customer response performance in answering calls within 30 seconds. RMP reports the customer response performance for 2025 (1<sup>st</sup> half) at 74%,<sup>21</sup> which is on track with that reported for 2024 at 78%. RMP's goal is 80%. RMP notes the reason for the lower response time score is due to an increase in call volumes. 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 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, 2025, through June 30, 2025, Service Quality Review Report.

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

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<sup>21</sup> Docket No. 25-035-29, *supra* note 10, at 22 of 41.