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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

Abdinasir Abdulle, Utility Technical Consultant Supervisor

Thomas Allred, Utility Analyst

**Date:** April 22, 2026

**Re:** **Docket No. 26-035-15**, Status Report of Rocky Mountain Power's Electrical Power Delivery Quality Plan.

## Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Rocky Mountain Power's (RMP) 2026 Electrical Power Delivery Quality Plan (Plan). The Division also recommends the Commission require Rocky Mountain Power to provide supplemental details for the equipment listed in Section 2 of the Plan, including brief descriptions of the use cases and deployment protocols for each device, in future filings.

## Issue

On March 24, 2026, RMP filed its Plan with the Commission. On March 25, 2026, the Commission issued an Action Request asking the Division to review RMP's Plan for compliance and recommendations. The Commission asked the Division to report back by April 23, 2026. Subsequently, on March 27, 2026, the Commission issued its Notice of Filing and Comment Period asking any interested person to submit comments by April 27, 2026, and RMP may submit a response by May 18, 2026.



Division of Public Utilities

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## Background

Enacted during the 2023 Legislative Session, HB 389 (codified in Utah Code §§ 54-25-101, 102, and 201) created the Electrical Power Deliver Quality Act, which requires qualified electric utility companies to prepare an electrical power delivery quality plan. Utah Administrative Code R746-316 provides the requirements for the submission, review, and implementation of a Plan. Under Utah Administrative Code R746-316-3, the Company is required to submit this plan biennially before April 1<sup>st</sup> of each even-numbered year.<sup>1</sup>

## Discussion

To satisfy the reporting requirements of UAC Rule R746-316-3(2), a qualified utility's filing must incorporate:

- 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 quality issues that do not meet the qualified utility's interconnection policy or relevant Industry Standards.<sup>2</sup>

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

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

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 1st each year.<sup>3</sup>

The Division notes that RMP continues to rely on well-established Industry Standards to evaluate power quality, including guidance from the American National Standards Institute (ANSI), the Institute of Electrical and Electronics Engineers (IEEE), and the Semiconductor Equipment and Materials Institute (SEMI-F47). The power quality metrics specified in the Plan match those set forth in Utah Admin. Code R746-316-2(7).<sup>4</sup>

RMP provides a list of the equipment used to measure those metrics, comprising ION 8650 B meters, GE KV2C meters, SEL 735 monitor, and Revolutions monitors, and their respective ANSI and IEC accuracy ratings. The Division believes that a more descriptive narrative explaining how these instruments are deployed to measure and evaluate power quality metrics would enhance others' understanding of the equipment, its uses, and its value.

The Company utilizes Policy 139 to establish criteria by which RMP evaluates interconnection requests to ensure that they do not adversely impact grid reliability or power quality. Additionally, the Company includes summarizations of additional studies which may be utilized to assess other power quality issues.<sup>5</sup>

The Plan establishes procedures used by RMP to collaborate with interconnected customer-owned generation systems, whose equipment adversely impacts electrical power service quality, to correct disturbances.<sup>6</sup> RMP also includes descriptions of the preventative programs and facility modifications that it will deploy to correct issues that violate the Company's interconnection agreement or other relevant industry standards.<sup>7</sup>

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<sup>3</sup> Utah Administrative Code R746-316-5(1), *Review of the Implementation of an Electrical Power Delivery Quality Plan*

<sup>4</sup> Docket No. 26-035-15, *Rocky Mountain Power's Electric Power Delivery Quality Plan*, March 26, 2026, <https://pscdocs.utah.gov/electric/26docs/2603515/344505RMPElectrlPwrDlvryQtyPlnMa242026Rprt3-24-2026.pdf>

<sup>5</sup> *Id.*, Section 3, *Procedures and Standards for Assessing Utility-Scale Interconnections*, at page 11.

<sup>6</sup> *Id.*, Section 4, *Procedures and Standards to Address Power Service Quality Issues*, at page 12.

<sup>7</sup> *Id.*, Section 5, *Preventative Programs and Proposed Modifications*, at page 13.

## **Conclusion**

Following its review of Rocky Mountain Power's 2024 Electrical Power Delivery Quality Plan, the Division has determined that Plan satisfies the requirements outlined in Utah Administrative Code Rule R746-316-3. Thus, the Division recommends that the Commission acknowledge RMP's plan. For future filings, the Division recommends that the Commission require Rocky Mountain Power to provide brief supplemental descriptions of the equipment listed in Section 2 of the Plan, detailing the use cases and deployment protocols for each device.

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