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September 14, 2012

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: In the Matter of Rulemaking for Service Reliability and Continuity Requirements for
Electric Public Utilities – Docket No. 11-999-005

On May 15, 2012, the Public Service Commission of Utah filed proposed rule R746-313 with the Utah Division of Administrative Rules (DAR) and opened DOCKET NO. 11-999-05 to take comments on the proposed rule. On July 2, 2012, Rocky Mountain Power (“Rocky Mountain Power” or “Company”) provided comments regarding the proposed rules. On August 1, 2012, the Commission posted changes to the proposed rule. Rocky Mountain Power appreciates that the changes to the rule proposed by the Commission incorporate many of the recommendations provided in the Company’s comments. The Company also appreciates the opportunity to provide the following additional comments and recommendations on the current version of the rule.

Several sections of R746-313 require the calculation and reporting of the “Momentary average interruption frequency index” or “MAIFI”. Rocky Mountain Power recommends the rule adopt the use of “Momentary average interruption event frequency index” or “MAIFIE” rather than MAIFI.

A momentary interruption occurs when the system tries to automatically restore power after a fault event. This typically occurs at substation breakers or other reclosing devices. Normally up to four attempts may be made by the system, and they happen fairly rapidly (within seconds of each other and all events within five minutes). Each of these individual attempts becomes a MAIFI measurement. The series of attempts to restore power, however, is considered a single momentary interruption event. In other words, for this fault event MAIFI would capture a measurement of four and MAIFIE would capture a measurement of one.

The impact experienced by the customer is related to the momentary interruption event (MAIFIE), rather than each individual momentary interruption operation (MAIFI). If the goal of the rule is to measure and report the impact of short duration interruptions on customers, such as the need to reset a clock or some other device, MAIFIE is the more relevant measurement. The use of MAIFIE is also consistent with reporting requirements in the other states in which momentary indices are reported.

In addition MAIFIE reporting should be required for total system (i.e state) reporting only. The Company develops its MAIFIE index with complex computations of its SCADA data. This data is not easily associated to a small geography (i.e. operating area, since circuits and substations can span operating areas) nor to specific days which may have reached major event thresholds (which are captured in a separate system for a specific operating area or reliability reporting region). Thus the Company requests that it be allowed to report MAIFIE for the system (i.e state) over the entire reporting period for which it is providing reliability results. While this will slightly overstate the momentary events for the state (since it would include major event momentary events), such reporting will be more accurate and repeatable.

Finally, for smaller events, details about restoration resources and costs may be not particularly valuable but require fairly substantial tracking efforts. The Company recommends a dollar limit or a count of facilities impacted where such resource reporting would be required. For smaller and shorter duration events, substantial lag in contractor billing and monthly closing documents can complicate major event reporting and result in non-compliance with the filing deadline.

With that background, Rocky Mountain Power recommends the following edits to the current version of the published rule:

- The following definition of MAIFIE should be added to R746-313-2:

"MAIFIE" means momentary average interruption event frequency index. (Note - This index does not include events immediately preceding a lockout.)

- The references to MAIFI on line 168 in R746-313-4(3)(b)(ii) and on line 382 in R746-313-7(3)(a) should be changed to MAIFIE
- R746-313-7(3)(a) should be further modified to limit the reporting by operating area to SAIDI, SAIFI and CAIDI only. This paragraph should read:

(a) the calculated SAIDI, SAIFI, CAIDI, and *MAIFIE* reliability indices for the reporting period. At a minimum, the electric company must report this information on a system-wide basis compared with the previous four years' performance and, *for SAIDI, SAIFI and CAIDI*, on an operating area compared with the previous four years' performance;
- The word "reliability" should be added to line 420 of R746-313-7(3)(f) so that it reads

(f) a listing of the T_{MED} values that will be used for each *reliability* reporting area for the forthcoming annual reporting period.
- The reference to MAIFI should be removed from lines 475 and 476 of R746-313-8(1)(d).
- A minimum dollar limit or other threshold should be added to R746-313-8(1)(e).

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Sincerely,

R. Jeff Richards
Assistant General Counsel
Rocky Mountain Power

Enclosures
Cc: Service List