

February 28, 2019

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
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UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-190027—Pacific Power & Light Company’s Comments

On January 22, 2019, the Washington Utilities and Transportation Commission (Commission) issued a Request for Written Comments, requesting input on the Electric Service Reliability Reporting Inquiry. Pacific Power & Light Company, a division of PacifiCorp (Pacific Power) continues to support Staff’s rigorous inquiry into creating a process to provide for better reliability reporting in Washington. Staff’s Findings and Recommendations is the culmination of months of difficult analysis and in-depth review into the processes that Pacific Power and other utilities engage in to maintain reliability. Pacific Power supports Staff’s Findings and Recommendations and looks forward to actively engaging and working with Staff on the next steps in this inquiry.

Pacific Power appreciates that as Staff has engaged with the utilities and started this process, a lot of time was taken to understand Pacific Power’s distribution system and the internal metrics that are used by the utilities to understand and plan for reliability. Pacific Power employees also continue to support the work being done by the Electric Markets and Policy Group at the Lawrence Berkeley National Laboratory dealing with Reliability Performance Data and Metrics.¹ This ongoing work can help inform Staff as this process continues. Pacific Power additionally supports Staff’s efforts to seek additional transparency into how budgets for distribution system investments are established.² However, it is important to note that while investment can influence reliability, there is no direct correlation between investment type and a specific reliability outcome. In fact, reliability results and the resulting summary metrics can be completely outside the control or even influence of the company. A few such cases would be when cars strike poles and damage company equipment, often causing fault events, or when Mylar balloons are loose and come in contact with circuit equipment. In wildfires, firefighting professionals often need electric infrastructure de-energized for their firefighting activities. Additionally, the increase in distributed generation on a utility’s system can have a complicated impact on reliability by limiting the options the utility has to respond to issues and coordinate circuits. Finally, reliability results can be broad indicators of performance, but do not on their own determine whether a utility’s performance is “good” or “bad.”

Pacific Power is supportive of Staff’s goal to improve “regulatory processes to ensure regulators and stakeholders have an accurate and consistent picture of reliability-related decisions made by

¹ See <https://emp.lbl.gov/projects/reliability-performance-data-and-metrics>.

² Reliability Reporting Inquiry, Staff Findings and Recommendations at 15 (2018).

the utilities.”³ Pacific Power is committed to working with Staff and stakeholders as this process continues, and looks forward to participating fully in the workshops ahead.

Please contact Ariel Son at (503) 813-5410 if you have any questions.

Sincerely,

 /s/
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³ *Id.* at 4.