

Docket UE-991168 Electric System Reliability Rulemaking  
WAC Chapter 480-100 Electric Companies - New Sections  
2nd Informal Draft Reliability Rule - November 7, 2000  
Comments by PSE—December 1, 2000

**WAC 480-100-xx1 Electric Service Reliability Definitions**

(1) “Electric service reliability” means the continuity ~~and quality~~ of electric service experienced by retail customers. *[Comment: Staff limited this rulemaking process to only address reliability, specifically sustained interruptions. There has been no detailed discussion regarding non-interruption related quality of service issues during this process. Therefore, “quality” should be dropped in this definition.]*

(2) “Reliability statistic” means a number, which may include multiple components (for example, service interruptions, customers, and hours), that measures electric service reliability.

(3) “Baseline reliability statistic” means a number *calculated by the utility that measuring-measures aspects of* electric service reliability in a specified year that ~~can~~ *may* be used as a comparison for measuring electric service reliability *for that utility* in subsequent years. *[Comments: First, language is suggested to clarify the statistics are used only for the specific utility, not compared across utilities. Second, as explained during the workshops, Staff should avoid overstating the usefulness of creating point estimates for year to year comparisons. The appropriate perspective of many reliability statistics is a point estimate with a large confidence interval; i.e., different values of the statistic may not be statistically significantly different, even though changes may appear large. Therefore, it is important recognize that simply looking at annual data, without the proper analytical context necessary to interpret that data into meaningful information, may not provide meaningful trend analysis.]*

(4) “Sustained interruption” means an interruption to electric service that has a length of duration specified by the electric utility, but in any case not less than one minute.

~~(5) “Power quality” means characteristics of electricity, primarily voltage and frequency, that must meet certain specifications for safe, adequate and efficient operations.~~ *[Comment: Staff limited this rulemaking process to only address reliability, specifically sustained outages. There has been no detailed discussion regarding non-reliability related quality of service issues during this process. Therefore, since this rule is titled reliability, the definition for quality does not belong in this rule]*

(6) “Full-system” means all electrical lines and equipment used by the utility to serve retail customers.

(7) “Major event” means an event, usually such as a storm, that causes a significant number of the utility’s customers to lose electrical service for an extended period of time serious reliability problems, and that meets criteria established by the utility for such an event. *[Comment: The suggested language revisions to this section are for clarification purposes. “Serious reliability problems” is an ambiguous term, which could be interpreted to mean situations other than those normally considered Major Events.]*

## **WAC 480-100-xx2 Electric Service Reliability Monitoring and Reporting Plan**

(1) Who must file. Electric utilities subject to commission jurisdiction must file a plan for monitoring and reporting electric service reliability information to the commission.

(2) When to file. The plan for monitoring and reporting electric service reliability information must be filed with the commission ~~ninety days~~ no later than one year after the effective date of this rule, though utilities are encouraged to file the plan sooner. Any modification to the plan must be filed with the commission before the modification is implemented. *[Comment: 90 days is a very short time frame for utilities to adequately develop the plan, which must include a detailed internal review and resolution of all implementation issues.]*

(3) What to file. The utility must file a plan for monitoring and reporting electric service reliability information to the commission. The plan, and any modification to it, must be accepted by the commission. The plan must include the following items:

(a) What reliability statistics the utility will report to the commission. The utility must select and define statistics that track full-system reliability, and ~~statistics-information~~ that tracks localized reliability and identify areas of greatest reliability concern. *[Comment: Not all relevant local reliability information is a “statistic.” Using the broader term information will capture this other relevant information.]*

(b) When the utility will establish its baseline reliability statistics to report to the commission. Prior to that date, the utility must report the best information available. The utility must establish baseline reliability statistics within three years of the ~~effective date of this rule~~ date the utility’s plan is approved. *[Comments: PSE is not clear regarding Staff’s intent on*

developing a “baseline” within three years. How information is collected will continually evolve, which is one reason the year-to-year comparisons will be of limited value. Therefore, without further explanation by Staff, PSE suggests dropping this entire section. If there is some reason to retain this section, PSE suggests changing the timing from effective date of this rule to WUTC acceptance of the plan. This will prevent an unintended consequence of utilities getting squeezed between WUTC acceptance of the plan and creating the baseline.]

(c) When the utility will file an annual electric service reliability report to the commission, ~~comparing each year’s reliability statistics with baseline reliability statistics.~~ [Comment: This last part of the sentence is not necessary as xx3, below, identifies information for the report.]

### **WAC 480-100-xx3 Electric Service Reliability Reports**

The electric utility must file an electric service reliability report with the commission at least once a year. The report must meet the following conditions:

(1) The report must be consistent with the electric service reliability monitoring and reporting plan filed under WAC 480-100-xx2. As set forth in the plan, in an identified year, baseline reliability statistics must be established and reported. In subsequent years, new reliability statistics must be compared to the baseline reliability statistics and to reliability statistics from all intervening years ~~to show trends.~~ [Comment: Without the proper analytical context and framework, conclusions drawn from the engineering and other data reported in the plan may not be accurate. This supports the explanation by PSE and the other utilities that distribution system planning is not a simple matter of monitoring a few statistics. Therefore, in order to avoid overstating the usefulness of data reported in the plan to identify trends by itself, the requirement that the statistics be used to show trends should be dropped. Additionally, please refer to Staff’s definition of Baseline in (3) of xx-1, which uses the term “compare,” not “show trends.” The language from xx-1 (3) is reasonable and should be carried forward in this section.] The utility must maintain historical reliability information necessary to show trends for a minimum of seven years.

(2) The report must address any changes that the utility may make in the collection of data and calculation of reliability information after initial baselines are set. The utility must explain why the changes occurred and explain how the change is expected to affect comparisons of the newer and older information. Additionally, to the extent practical, the utility must and quantify the effect of such changes on the comparability of new reliability

statistics to baseline reliability statistics. [Comments: Often, it is not possible to create a formula to compare information based on new data collection techniques with old information. For example, if a utility believes with a 90% certainty that a particular real measure is plus or minus 25% of the calculated number and a new technique will improve to plus or minus 15%, there is really no way to compare. Especially when the initial plus or minus 25% was subjective and there is still a 10% chance the actual number lies outside the confidence interval. Utilities may, however, be able to affirmatively state the updated approach is more accurate.]

(3) The report must identify the utility's ~~worst reliability problems~~ geographic areas of greatest reliability concern, ~~provide an analysis of~~ explain their causes, and explain how the utility plans to address them. [Comments: First, PSE suggests replacing "worst reliability problems" with language from xx2 (3) (a) because areas with lower reliability or areas of concern may not necessarily be "problem" areas. Second, providing an explanation rather than an analysis of the cause is a better description of this kind of information.]

(4) The report must identify the total number of customer complaints about sustained interruptions of electric service ~~reliability~~ made to the utility during the year, ~~and must distinguish between complaints about sustained interruptions and power quality~~. The report must also, to the extent practical, identify complaints that were made about major events. [Comments: As indicated above, the intent of this rule was to focus on sustained interruptions, therefore, references to power quality should be not be addressed in this rule. With regard to complaints during major events, it may not be feasible to reasonably track complaints during a major event when the utility is so focused on restoring power while receiving telephone calls from thousands of customers. PSE assumes Staff would prefer the Company to direct resources during a major event at restoring service and communicating with customers rather than trying to ensure every informative call is separated from every complaint. It does seem reasonable, however, to separate complaints regarding major events from other outage related complaints, if possible. Thus, it seems reasonable to include some softening language in the requirement to track major events related complaints.]