

April 19, 2011

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: \*\*DO NOT REDOCKET\*\*  
Docket UE-110634 – Modification to PacifiCorp’s Annual Electric Reliability  
Monitoring and Reporting Plan pursuant to WAC 480-100-393**

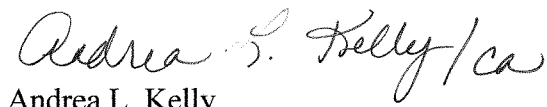
Dear Mr. Danner:

On April 8, 2011, pursuant to WAC 480-100-393, PacifiCorp, d.b.a. Pacific Power (“Company”) submitted to the Washington Utilities and Transportation Commission (“Commission”) modifications to the Company’s Annual Electric Reliability Monitoring and Reporting Plan (“Reporting Plan”). On April 14, 2011, the Company filed a revised page 10. Based on discussions with staff, PacifiCorp has made additional revisions to the Reporting Plan. As such, the Company submits the following revised pages to the proposed Reporting Plan.

Table of Contents	Revised Page 2
Executive Summary	Revised Page 3
Appendix A	Revised Page 10
Appendix B	Revised Page 11

Please direct any informal questions to me at (503) 813-6043, or Heidi Caswell, Director, Network Performance, at (503) 813-6216.

Sincerely,

  
Andrea L. Kelly  
Vice President, Regulation

Enclosures

c: Deborah Reynolds – WUTC

## Table of Contents

Table of Contents .....	2
Executive Summary .....	3
1.0 Reliability Definitions and Service Territory .....	4
1.1 Reliability Definitions .....	4
1.2 Service Territory Map .....	7
1.3 Outage Definitions .....	7
2.0 Performance .....	8
2.1 Historic Performance .....	8
2.2 Reporting Period Performance .....	8
2.3 Subsystem Performance .....	8
3.0 Areas of Concern.....	9
4.0 Underperforming Circuit Reliability .....	9
5.0 Customer Communication Process and Complaints.....	9
6.0 Reporting Period .....	9
7.0 Appendix A: Baselines and History Through 2010.....	10
8.0 Appendix B: Annual Report Table of Contents .....	11

## Executive Summary

Washington Administrative Code (WAC) 480-100-393, requires that electric utilities subject to Washington Utilities and Transportation Commission (Commission) jurisdiction file a plan for monitoring and reporting electric service reliability information to the Commission. Further, this rule requires that the plan include the following:

- What reliability statistics and information the utility will report to the Commission including full-system results and appropriately localized results to support annual identification of areas of greatest concern.
- When baseline reliability statistics will be established, not exceeding three years from effective date of the rule<sup>1</sup>.
- When the electric annual reliability reports will be filed annually.

As PacifiCorp (Pacific Power or the Company) continues to evaluate and improve upon its reliability reporting systems, it continues to modify how it analyzes and communicates system reliability. As a result, the underlying reliability reporting plan may require modification to incorporate any improvements realized. The following monitoring and reporting plan outlines the information that the Company will report annually, and identifies any definitions, metrics and calculations used for annual reporting. The report will be filed annually by May 1 with performance results calculated for the prior calendar year.

The intent of the plan and annual reports is to evaluate and communicate reliability results delivered. The Company, however, cautions that while general trends may be detectable, underlying causes for these trends are not always obvious. For instance, substantial variation in weather may lead to significantly differing results. While the Company believes such attention to system and subsystem reliability is critical to effective operations, comparisons should recognize influences that may impact such comparisons. For example, as reporting systems evolve they can influence system metrics, but actual customer experience may remain the same as or be similar to prior periods. Further, comparisons among companies reporting similar metrics may not yield accurate or useful conclusions due to differences in data collection methods, customer demographics, system age or physical environments.

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<sup>1</sup> Performance baselines were established in June 2003 in Advice Filing 03-006, in Docket UE-981627, and history through 2010 is attached in Appendix A to this document. PacifiCorp believes that its calculated baselines, which were agreed upon in 2003, were consistent with the intent of the rules. Specifically they were designed to both establish normal performance metrics against which subsequent years' performance may be measured and to serve as a comparative base for evaluating the success of achieving commitments that were made. In 2003 these were calculated using 4 of the last 5 years of performance, averaged and restated recognizing that reporting processes had changed. The performance baselines are consistent with WAC 480-100-388, 480-100-393, and WAC 480-100-398. This plan explicitly identifies that these were set in 2003.

## 7.0 Appendix A: Baselines and History Through 2010

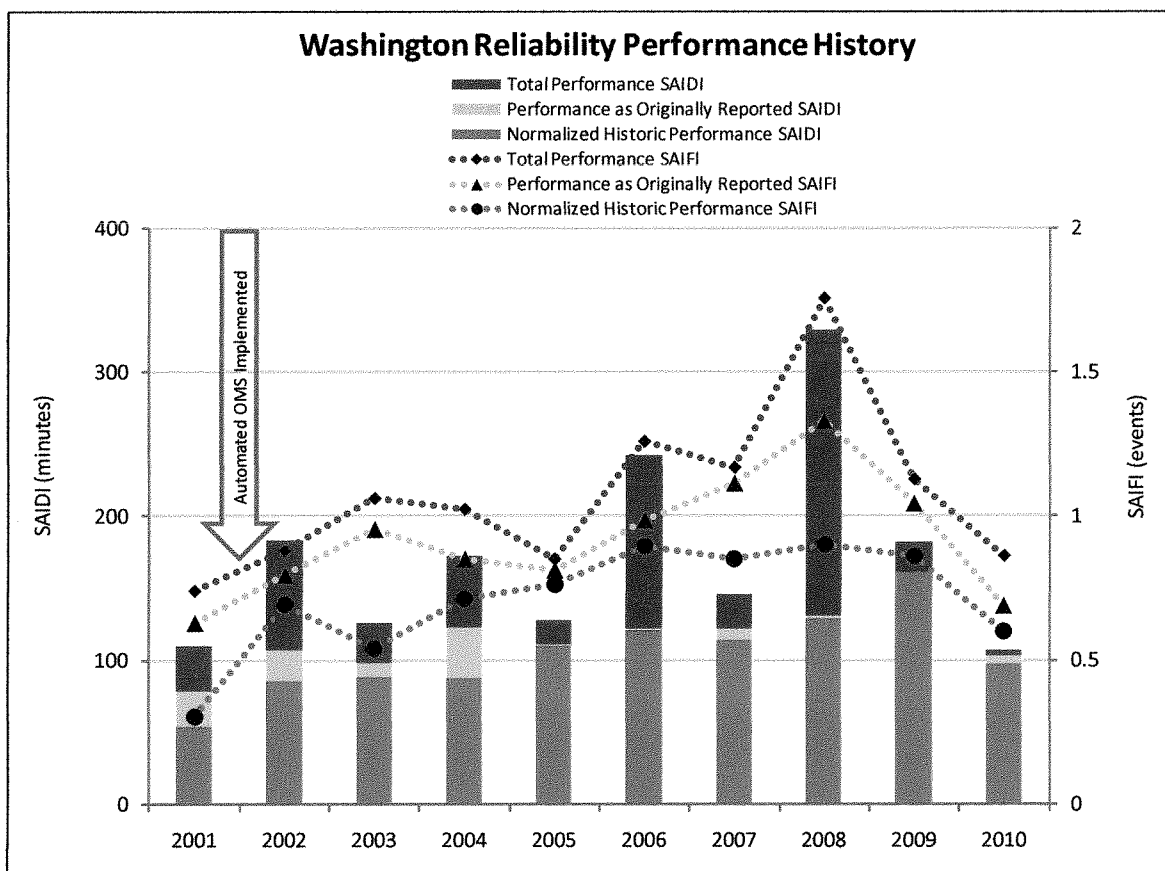
Year	Major Events Included <sup>1</sup>		SAIDI Based Major Events Excluded 2.5 beta		SAIFI Based Major Events Excluded 10% Op Area		Major Events Excluded As Reported <i>(2.5 beta effective 2005)</i>		Normalized Historic Performance <sup>2</sup>	
	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI
2001	110	0.741	53	0.483	54	0.303	78	0.628	53	0.303
2002	183	0.881	86	0.691	109	0.726	107	0.795	86	0.691
2003	126	1.062	91	0.933	89	0.539	98	0.954	89	0.539
2004	172	1.024	87	0.712	119	0.726	123	0.851	87	0.712
2005	128	0.851	110	0.811	121	0.763	111	0.812	110	0.763
2006	242	1.259	121	0.982	187	0.894	122	0.985	121	0.894
2007	146	1.169	122	1.115	114	0.852	122	1.115	114	0.852
2008	329	1.756	131	1.332	129	0.899	131	1.331	129	0.899
2009	182	1.128	162	1.044	162	0.861	161	1.044	162	0.861
2010	107	0.862	107	0.862	97	0.601	103	0.688	97	0.601

<sup>1</sup>Customer requested and pre-arranged outages are not reported in these metrics

<sup>2</sup>Normalized performance is the result of applying both SAIDI and SAIFI-based major events to establish underlying performance

<sup>3</sup>Performance baselines were established in June 2003. See page 3 of report.

SAIDI performance baseline of 150 and SAIFI performance baseline of 0.975.



# 8.0 Appendix B: Annual Report Table of Contents

## TABLE OF CONTENTS

- TABLE OF CONTENTS.....2
- EXECUTIVE SUMMARY .....3
- 1 Service Standards Program Summary .....3
  - 1.1 PacifiCorp Customer Guarantees.....4
  - 1.2 PacifiCorp Performance Standards .....5
  - 1.3 Reliability Definitions and Service Territory .....6
- 2 CUSTOMER GUARANTEES SUMMARY .....9
- 3 RELIABILITY PERFORMANCE .....10
  - 3.1 Historical Performance .....10
  - 3.2 System Average Interruption Duration Index (SAIDI).....11
  - 3.3 System Average Interruption Frequency Index (SAIFI).....13
  - 3.4 Operating Area Metrics.....14
  - 3.5 Cause Code Analysis.....15
  - 3.6 Areas of Greatest Concern.....18
  - 3.7 Reduce CPI for Worst Performing Circuits by 20% .....19
  - 3.8 Restore Service to 80% of Customers within 3 Hours .....20
  - 3.9 Telephone Service and Response to Commission Complaints .....20
- 4 CUSTOMER RELIABILITY COMMUNICATIONS.....21
  - 4.1 Reliability Complaint Process Overview.....21
  - 4.2 Customer Complaint Tracking.....22
  - 4.3 Customer Complaints Recorded During the Period.....22
- 5 WASHINGTON RELIABILITY RESULTS DURING 2010 .....23
  - 5.1 State Reliability .....24
  - 5.2 5Y356 .....25
  - 5.3 5Y184 .....28
  - 5.4 5Y314 .....30
  - 5.5 5W306.....32
  - 5.6 5W342.....34