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Washington Utilities and Transportation Commission  
WUTC Records Center  
1300 S. Evergreen Park Drive Southwest  
Olympia, WA-98504-7250

RE: Electric System Reliability Rulemaking  
Docket No. UE-991168  
New Rule Addition to Chapter 480-100 WAC  
Notice dated December 18, 2000

WAC 480-100-xx1 Electric Service Reliability Definitions, (1), defines "Electric Service Reliability" as meaning continuity of service. In your notice of November 7, 2000 the definition included "Quality of Service". This change is confusing and it appears that any requirement for monitoring or reporting quality of service is not included in item WAC 480-100-xx2. Yet, in item WAC 480-100-xx3(4), the total number of customer complaints about power quality is to be reported. Again, this is confusing because this is not called for in item WAC 480-xx2. Also, surely the nature of complaints is as important, or more so, than the total number.

If electric power is to be monitored, recording of voltage level should be done in addition to recording power outages. Certainly, power outages command prime attention, but the destructive nature of voltages that exceed the limits of the "CBEMA" curve is also deserving of attention. The curve applies not only to computers but also to all electrical devices in one way or another.

Yours truly,

C. C. Grassia