

April 28, 2011

Ms. Andrea Kelly
Vice President, Regulation
Pacific Power & Light Company
825 NE Multnomah, Suite 2000
Portland, OR 97232

Re: Pacific Power & Light Company's Modified Electric Reliability Reporting Plan
Docket UE-110634

Dear Ms. Kelly:

On April 8, 2011, Pacific Power & Light Company (PacifiCorp or company) filed a modification (Proposed Plan) to its annual electric reliability monitoring and reporting plan¹ as required under WAC 480-100-393. PacifiCorp filed replacement pages on April 12, 2011, and April 19, 2011. PacifiCorp's Proposed Plan describes what will be included in its annual electric system reliability reports filed pursuant to WAC 480-100-398. The annual electric system reliability report will include:

- 1) Full-system reliability performance statistics – The company will report SAIFI² and SAIDI³ both including⁴ and excluding⁵ major events. The company will also report CAIDI.⁶ The Commission-accepted performance baselines⁷ will be included. Data from multiple years will be included for the company's various full-system reliability statistics;
- 2) Localized reliability performance statistics – The company will report SAIFI and SAIDI, both including and excluding major events, for each subsystem. The company will report

¹ Initial Reporting Plan filed November 30, 2001, in Docket UE-011433. Modified Reporting Plan accepted December 10, 2007, in Docket UE-072275.

² System average interruption frequency index defined as outage events per customer. Results will also include the 4-year-average of all outages (normalized historic).

³ System average interruption duration index defined as outage minutes per customer. Results will also include the 4-year-average of all outages (normalized historic).

⁴ Total outages (major events included).

⁵ Exclusions will be: SAIFI-related-outages where 10% of customers are affected (10%), SAIDI-related-outages based on a statistical analysis of the breakpoint between day-to-day operations and major events (IEEE-2.5 beta) and major events as formerly reported (as reported).

⁶ Customer average interruption duration index defined as average restoration time in minutes.

⁷ Docket UE-981627, 8th Supplemental Order Accepting Compliance Filing to Establish Network Performance Baselines (July 10, 2003). See also Docket UE-030665, Initial Filing (May 7, 2003).

CPI⁸ both including and excluding major events. The company will also provide maps analyzing each local office using CEMI⁹ to identify and plan to remedy its areas of greatest concern;

- 3) Information on outage causes – The company will track outage causes and provide customer minutes, number of customers, and number of outages by cause;
- 4) Customer complaint information – The company will document and report customer complaints regarding power quality, sustained service interruptions and major events.

The annual electric service reliability report will be filed on or before May 1.

The Proposed Plan has been discussed with commission staff members and is expected to produce annual electric system reliability reports that continue to provide accurate, timely information on customer service reliability. PacifiCorp's modified electric reliability monitoring and reporting plan is deemed consistent with WAC 480-100-393, and is accepted by the commission.

Questions about the contents of this letter should be addressed to Ms. Deborah Reynolds at dreynold@utc.wa.gov or 360-664-1255.

Sincerely,

David W. Danner
Executive Secretary

⁸ Circuit performance index.

⁹ Customers experiencing multiple "n" sustained interruptions.