

INLAND POWER & LIGHT COMPANY

Comments Provided to WUTC
Docket No. UE-991168

Comments Prepared By: Dave Clinton
Assistant Manager for Operations & Engineering
October 11, 1999

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Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr., S.W.
Olympia, Washington 98504-7250

Dear UTC:

This letter is provided in response to your invitation for comments concerning Docket No. UE-991168, Electric System Reliability.

We support your efforts to develop rules to regulate electric system reliability for investor-owned electric utilities. Our reasons include:

There is a Need

Inland Power & Light Company (IPL) is dependent on an investor-owned utility, Avista Corp., for service to our customers. In other words, even though we purchase all of our power from the Bonneville Power Administration (BPA), much of it is delivered over facilities owned and operated by Avista.

We have noticed an unfavorable service reliability trend as reflected in the graph attached to this letter. The blue area reflects annualized outage-hours per IPL customer. (For example, the January 1996 amount of .42 reflects the total for the twelve months ending January 1996.) The red line reflects a computer-generated trend for the same period.

As you can see, our average outage-hours have almost double during the period of time documented by this graph. This trend is driven largely by outages related to facilities owned and operated by Avista. In fact a recent analysis documented that although only 40% of our power is delivered over Avista-owned facilities, over 75% of our power supply-related outage hours relate to failure of their system.

We believe this is a serious problem and recommend UTC action.

Reporting Procedures Need Clarity

As already stated, IPL customers are very dependent on Avista-owned facilities. I know other utilities in this area are in the same position. Therefore I have a question: Should Avista's service reliability statistics include the total impact of service interruptions, or only the impact on their own customers? As Avista's regulators, it seems like you should know the total impact on Washington citizens. I recommend your revised rules deal with this issue.

I thank-you for the opportunity to comment on this important issue. Please call me if you need additional information or have questions.

Sincerely;

INLAND POWER & LIGHT COMPANY

Dave Clinton
Assistant Manager for Operations & Engineering

Attachment: Graph

