

**ELECTRIC RELIABILITY WORKSHOP  
DOCKET NO. UE-991168  
JULY 21, 2000**

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Staff: (DK)

Focus: Staff developed some specific language in hopes of making it more clear to companies the kinds of things that they're thinking about. Drafted language talks about specific kinds of reporting and information that the Commission believed would be useful to determine what was happening with reliability and if reliability issues were being met.

Discussion today should be about if Staff was clear in this language in terms of example information. Are there other ways of presenting this information that might be more clear. Reliability is individual in terms of each utility. It can vary due to a number of things: Density of population; geography; weather; etc. The attempt in the proposed language was to allow companies to develop their own plan for how they are going to report. What time frame they are going to get their system of information collection put together and stay away from a one-size fits all approach.

The other side is you have a single Commission and a single Commission Staff that will try to evaluate this information. So the drafted language tries to ask for some commonality in terms of what information is submitted so that when a particular question is asked there is similar data to look at for answers.

**WAC 480-100-xx1 Implementation Plan**

PSE: (PP)

Why is staff proposing a rule? If we have to have a rule, then we would all support the idea making sure that you are not making requirements that we cannot technically comply with.

Staff: (MA)

Staff has not made a decision, but is leaning toward a rule of some sort.

Commission wants to be able to track reliability into the future particularly with the possibility of deregulation and re-regulation and what happened in telecommunications.

Looking at tracking some decent level of accurate information that can be monitored as years go by.

To the degree possible, Staff would like the individual utilities set forth what they're going to report, condition that reporting, and tell Staff what it is they're going to do.

The implementation plan is the opportunity for the utilities to explain what it is Staff will see in the annual reports.

This rule could be implemented in stages

(MS)

One of the requirements of the Administrative Procedures Act (APA) and Governor's Executive Order is that things that are policy issues that effect parties outside the Agency they need to be put into a rule.

The Commissioner's have been concerned that cost cutting should not result in less reliable service. Part of this is just looking at a baseline of where we are. Staff does not have baseline data.

We are also looking at whether the levels of reliability are sufficient.

The Commission does not want to impose undo cost but to give customers more reliable service.

**Comments on (d):**

AVISTA:

(DD)

What type of calibration device would be used to measure accuracy? What is the level of accuracy? There's no way to know just how accurate it is. Basically the numbers are all

just estimates.

Staff: (DK)

The 6560 study showed a wide variation in the accuracy of the data the companies were reporting. This was not an expectation that we would identify some level of accuracy. We are asking how accurately do you think your data is being reported.

(MA)

Want to explore over time the improvements in the accuracy of the data. We are most interested in whether or not the numbers that we are seeing are telling us whether reliability is being maintained or is going up or down. The intent over time would be to get fairly accurate so that maybe in three or four years if we see an increase or decrease in reliability we actually knew that it reflected an increase or decrease.

(KD)

Can we agree that Staff intends the utilities to explain the level of accuracy?

PacifiCorp:

(AB)

Thinks the message here is not the level of accuracy as the consistency in the reporting that is done.

Staff: (MA)

There may be different levels of accuracy and we want to know what those are. We are looking at what each utility can tell us.

PacifiCorp:

(AB)

If you do any auditing on a system, what you're auditing is a process. Has a problem with phraseology. We don't see the rulemaking as the correct vehicle for outage reporting.

PSE: (PP)

Concerned with increasing costs to customers without any greater benefits to them. It might wind up just giving the Commission more data and won't do anything for customers. Wants to know what the Commission will do with this information and what's the value of this information for customers.

Staff: (DK)

We would like to see an evolution over time of what's happening on the system. Is reliability improving or degrading. That's why we want to know something about the level of accuracy. Which data points are comparable. Reporting system could change over time.

PSE: (PP)

The data will not give a real point estimator. It's more of a broad confidence interval around these various points and how they move over time.

(MS)

Customers expectations will change over time and you're measuring reliability as if the customers are static. How are you going to include that?

Staff: (DK)

That's an evolving process that both the Commission and the companies are going to need to have those discussions with customers as opposed to making assumptions for them.

(MS)

We aren't trying to dictate levels or what your planning should be as much as we're trying to get an accurate picture of where you are. We're trying to know baseline data of where we are and we're trying to be able to track, in some broad sense, where we are going. We're trying to look at the emerging competition in your industry and we're trying to look at the fact that some utilities are going to be mostly distribution utilities. In the past we've only been able to look at reliability at the transmission levels. We're trying to look at the distribution level and try to get a common understanding of where you are and have you tell us where you're hoping to go rather than us telling you where you should go.

PSE: (MS)

Concerned that this information may become a default bogie.

Staff: (GE)

Compare to price index adjustment in financial studies.

PacifiCorp:

(CR)

Page 2 lines 7 and 8. Language concern. Maybe instead of this language something that said "the utilities shall explain changes in reporting systems which may affect year to year trends." So when we go into changing our reporting systems we know that they're going to have a big affect on what we have been reporting.

PSE: (HC)

Reporting requirements on page 3 lines 2 and 3 get very detailed planning type of specifications or planning type of data. This is the information that engineers evaluate on a day to day basis and try to understand what's going on and create their own plans to improve the trends. It feels like this has gone from a fairly high level, focused on the customer, to a really operational level of detail that doesn't seem very useful and instead seems more duplicative or redundant.

Staff: (MA)

Those are two that we felt were primary measures. One of the questions is whether it would be system level or some other level. We are asking for these two things but if you want to add anything else you have the opportunity.

PSE:

(HC)

Level of detail could be a problem. Granularity issue.

PacifiCorp:

(AB)

Once you go beyond the IEEE measures you're in various levels of granularity and complexity and cost to the utilities. Other levels are premature at this stage in terms of rulemaking. We are a ways away from being able to deliver that level of detail.

Staff: (DK)

Staff's interest is to get information to answer questions for individual customers or small groups of customers. System-wide average is a very broad number that doesn't relate at all to what is maybe happening for that particular customer. Is there a way that we can provide better detailed information for those customers. That was what we were getting at in talking about more detailed information.

The Commission is interested in reliability on a company-wide basis, but may be interested in whether or not there are pockets or specific areas within a company's system which are doing much better or much worse than the system average. We want to know what that is and what the company is thinking about. How can we get there?

(MA)

What would it take to get to the level of reporting that would be very close to the individual customer level and then sort of work backwards from there?

PacifiCorp:

(CR)

Seems like you want information for problem areas, areas that maybe a lot of customers called in about. And also information for individual customers who call the Commission who have a complaint or concern about their neighborhood, their circuit, their house. Thinks both of those pieces of information are important for the Commission to have. Suggests you get at the problem pocket area by doing something like worst performing circuits.

How you get at the customer level complaint information, they have a outage complaint template (provided with written comments) of what they provide customers who call with an outage complaint. They do it system-wide and provide three years of information on their circuit. We tell their feeder characteristics, the tree trimming, all

that type of information that would go on that customers concern. We could use other tools to get at the type of information you are trying to gather.

PSE: (PP)

How do you deal with that individual customer level? Maybe companies could work with staff to come up with some kinds of templates.

Staff: (RK)

Thinks we're getting off track when we talk about the individual consumer. Thinks it should be at a higher level.

(MA)

If we can get the information at the customer level, we can look at where that customer, or the customers surrounding that customer on a lateral and we can respond with information about what's going on in that customer's area and we can tell them what's going on to serve them.

PSE: (MS)

Concerned that we're setting up rules and processes that, in reality, the system could change dynamically from the way it is today and companies are going to be held accountable in going down a path or setting a path or an infrastructure. We want to be looking at the system-level. Better processes at customer level is a better way of doing business.

(PP)

Reasonable for Commission to have baseline information about reliability. Has a problem with detailed information.

More critical issues are on generation and transmission, at this time. Suggesting that we should be starting with a NOI process so we can get answers to the policy questions before starting to draft a specific set of rules to implement a policy that parties are not sure about. Except if you were to say that the policy is to have a baseline of information at some level so that we can see where we're at.

Staff:(DK)

Doug will respond to issues outside this meeting to PSE personally or in writing.

### **Section (g) comments; Threshold Criteria**

Avista:

(DD)

Concern that if we were have to set some SAIDI or SAIFI standard out of the blue because we really don't have any trend of data that would allow us to set some meaningful threshold. We are a little more comfortable after talking with Doug, that as

we do collect data we are going to be allowed sufficient time to collect data to develop trends to then maybe set some threshold. Beyond that there's probably some more detail behind that because we do have quite different geographies and customer demographics within the system as to what the threshold or thresholds would be meaningful and useful to customers.

Staff:

(RK)

Do you internally set your own thresholds for business purposes?

Avista:

(RH)

When determining where to allocate money in a Capital Budget or system improvements, it's based it off of historical information from people that have been with the company for a long time as to where they see that the system needs improvement. And also perhaps capacity constraints. They look at large problem areas. Just starting the process of really keeping track of these types of outages and trending them. No threshold at this point. Don't want to be held to these threshold numbers or to be committed to put that level out there right now. Still in the gathering stage and in a couple of years could state a reasonable threshold.

Look at, capacity, growth, prudent, and reliability and then prioritize. Then look at dollars they have to work with.

Staff: (DK)

Wants utilities to tell us how they make decisions on these issues. Staff wants to understand what's going on. Staff wants to be more educated about where you are.

PacifiCorp:

(AB)

Voluntarily said they would improve SAIDI and SAIFI by 10%, that's at the system level. If you go to the circuit level that really doesn't give you the answers. It almost forces you to customer level if you want to introduce thresholds. Then, how do you collect the data and what is an acceptable level of performance? How do you set the threshold? Threshold, you have to look at what is adequate performance.

Staff: (DK)

The concept of what a threshold would be is you start at the tail end. At some point, to make it meaningful, it includes some group or something. The company identifies and establishes its threshold and Staff has termed that as the threshold. There could be several levels to that threshold.

PacifiCorp:

(AB)

Cost issue for tracking some information. They have 1.4 million data points.

Staff: (MS)

How can we change how we describe a threshold so that we can find out how you have identified the problem areas and how you plan to address them?

PacifiCorp:

(AB)

The wording is in our performance standards. If you set a threshold, that can become dangerous because if you set it too low for a circuit, you're gold-plating it to meet that threshold.

Staff: (MS)

Staff does not want to punish companies if it falls below thresholds. They just want to know why you are below it. It's a line to analyze what happens below it. There may be no need to do anything for those (circuits) below the threshold.

If we define threshold in terms of circuits rather than in terms of customers, would we get to the same place?

(DK)

Threshold in Staff's mind is determining what a baseline is and if a particular customer falls below that line why that is and have the ability to explain why that is and what may or may not be done.

PSE: (MS)

Wants planning process documented if we are to get into this issue. That would be a different rulemaking than this. It has to do with strategies and what's going on in investments.

Concerned about the intrusiveness of the whole process. If it's the intent that the Commission would like to see what the companies are doing, we would be glad to tell you.

Staff:

Doesn't understand point of PSE comment.

PSE: (PP)

By implementing the threshold idea the focus has shifted from the baseline data reporting and gone into decision making processes.

Thinks a simpler kind of a rule would be something like identifying the worst performing circuits and reporting on what's going to be done about them.



(MS)

Real concern that what you're getting into is forcing utilities, or suggesting to utilities, that you invest in the wrong part of the system. That gets into the question of the planning and the planning process.

What boundaries is the rulemaking trying to affect? Is the bounds of this rulemaking going to involve planning and how the utility does planning; i.e., the "black box".

Staff: (MA)

Staff is trying to establish threshold not value.

Staff is asking, through this threshold process, to see where the worst performing areas are. Then in the annual plan, asking you to explain those. If you explain them well in the report, we may not talk to you any more about them. But, if we see some numbers that concern us and we ask you to come down and explain them in more detail to us, that could happen. That is the extent of what we're trying to get to.

It is not Staff's intent to involve itself in companies decision making.

It is Staff's intent to highlight, through the threshold concept, problem areas that Staff wants explained. These are the worst areas, from the perspective of the customer, who had the most interruptions or most hours of interruptions, or some criteria like that.

PSE: (PP)

It's going to be difficult to establish a set of parameters that combines all of those business processes in terms of pulling all this together of what customer wants and needs are. What the economics and finances of the situation are and why.

Not clear on what a threshold is.

Staff: (DK)

A threshold is, at some point you say we're going to do this up to this amount or we're going to report on things that have this kind of action on them. Staff is not trying to establish a level of value to what a threshold might be.

PacifiCorp:

(CR)

Maybe you should eliminate threshold criteria. Maybe tell us what your circuit performance indicators are. Then maybe what areas are slated for improvement in the following year and why? That seems like a reasonable request and something that they would be happy to lay out for the Commission.

Staff: (MS)

We do not want to give the impression that we think there's a threshold as a standard that

you must meet. We are not trying to set standards. We are trying to get information.

(MA)

We also have a set a specific way of getting there and we would like comments on that.

What if you were able to monitor at the customer level and then build up from there? Would you run into the same problems with accuracy? You run into different problems. There's cost to it. It seemed that if you could monitor it, there would be some difficulty with accuracy, but you wouldn't run into the same kinds of problems that you would at the circuit level.

When we say threshold in this document, we are talking about a specific thing at the customer level who experiences some level of interruption or hours of interruption or there might be other criteria that you would like to apply, but it's at the customer level. You can determine where the cutoff can be. Threshold does not apply to circuit level. Threshold applies to the specific individual customer. At some point there are the customers that have experienced the most interruptions and the longest hours of interruption. You could determine where the tail ought to be. You can give us the reasons for where the cut-off should be. You could also put in other criteria, such as this is a low cost area or a high cost area. That is the meaning of threshold in this document. Those are the only customers we care about. We thought you could aggregate them on to their circuits and you would be reporting to us the worst performing circuits as defined by the circuits that have the customers on them with the greatest number of interruptions and the longest hours of interruptions. That defines for us, from the customer level, what the worst performing circuits are. It's those circuits, defined that way, that show us your customers that have the worst number in interruptions and the worst hours of interruptions. That helps to see the value of that. Can you get there and what will it cost? Maybe it costs too much and we have to do something else, and getting to worst performing circuits is the only thing we can do. Can you do the customer level and then build up or not? It might be that we need to go to that level of worst performing circuit or that other level of worst performing circuit that you raised. But can the other be done and what would it take to do it? Do you understand the value of that and what it would mean?

IBEW:

(MD)

I think PSE has the ability to report at the customer level. Has a question as to the accuracy at the customer level.

PacifiCorp:

(AB)

There will be a lot of judgement involved in defining the cut off point for the thresholds. Has a nervousness about declaring a number. Doesn't think the cutoff point is something that we need to report on. There's a danger on putting a number on thresholds. What

we're looking for is where you can make a genuine improvement in service to the worst suffering customers. If you go to the customer level that's a huge investment. The danger of putting numbers on thresholds is that you step back into the planning decisions.

PSE: (PP)

We have been hearing to wholly different sets of what this rule means. If we're talking about a threshold where we'll report on our four worst performing circuits, and Avista will choose a different number of worst performing circuits, if that's what we're talking about, that's a different question than saying I want you to look at utility planning from a totally different perspective and start at the bottom up and implement a bunch of individual customer level threshold numbers that get to how you do your planning and how you change things.

The AMR system was never set up to be able to continuously monitor the continuity of service to each individual customer and doesn't have the capacity to do that. There's nobody in the industry that uses that level of data for planning and for managing their systems.

Staff: (MS)

Are there better ways of doing what we proposed in the draft language?

(KD)

Suggested a small group to work on threshold issues.

PacifiCorp:

(AB)

Main comment was that they have offered that they do some sort of the volunteer program where they start to report things without the rule hanging over them. Out of that would come what's available, does it make sense, does it satisfy the Commission needs and can it be used to address customer's concerns. If we develop that and at the end of that we find we still need the rule, OK. But, if a rule is done now were stuck in a definition before we've seen the data.

Staff:

(DK)

The Governor's Office and the Commission has given the direction that if you have a means of doing business or something that is required, that it be something that is published in a rule as opposed to in a slip of paper in my desk. Our task is to try to establish what the Commission needs and to write it down. I don't see a rule as set in stone. We need to figure out what kind of a program would work.

(MS)

Not sure we need to worry about which forum the information is in if we're in a position to figure out a kind of program that would work. Then if the Commission determines,

because of the Governor's policies, that it's better to put that into rule, we could be pretty flexible with what we do with rules. We could put a sunset on this rule so we knew we were going to look at it again in 3 or 5 years. We could just have an understanding that if anyone wanted to change things, you could file a petition. Doesn't see this rule as being set in stone.

PacifiCorp:

(AB)

Could supply the report used in the United Kingdom as an example.

PSE: (HC)

Use EPRI (Electric Power and Research Institute) report and merger agreement to define thresholds in work group.

Staff: (MA)

Hasn't heard from the companies yet specifics about what it would take to get to what's being asked for in the draft language. Would hope if we do have a working group, we don't set it up just to look at an alternative to this.

PacifiCorp:

(AB)

It's not a matter that we don't want to go there, it's more a matter of how far can we go before we start to incur major costs.

(CR)

Has a concern with committing to a rule when we don't know how long it's going to take to get to where we are going. Maybe take the rule and look at it in chunks and pieces where we did so much in the next year or two and then look at it in year three.

Staff:

(MA)

Very opened to both non-rule alternative and rule alternatives that might get us there down the road taking it bit by bit, piece by piece. Concerned about ignoring this perspective because it doesn't feel good or it's going to cost a lot of money. Our concern is, five or ten years down the road to be where we ought to, and want to be. There are different ways to get there and he's open to that. Tried to build it with some flexibility.

PacifiCorp:

(AB)

It's not our intention not to give good customer information. Because of the uncertainty in that middle ground, doesn't necessarily think a rule is the way to get to it. If we are going the way of a volunteer program, we set the terms of reference around that, such as what data is available? What planning information the companies can provide? How do we measure the system level of reliability? How do we address customer concerns?

How do we provide information in a customer friendly fashion?

PSE:

(PP)

Favors a more informal working group session. Supports voluntary program, as needed.

Avista:

(RH)

Do all companies need to report at a certain (same) level?

Staff:

(MA)

This is beyond where we really know what the answer is. There can be certain significant differences.

RECAP:

695, Tape 2, Side B.

### **Open Discussion About Where We Proceed From Here:**

Staff: (DK)

Suggestions for going forward. Wants to pursue the suggestion to look at other methodologies. Open the suggestions about pilot programs, sub-groups, etc. Also wants to talk about specific language that is written down.

Looking for specific reaction to the specific ideas in draft language. If there is something that is infeasible, we'd like to know why that's infeasible. If it's too expensive, we'd like to know why it's too expensive and in order of magnitude, what does that mean. Or if this is just impossible to achieve.

Wants to focus on the thinking that this kind of activity is something that we would anticipate would follow some type of an evolution.

PSE:

(MS)

Has a fear that we are looking at input data rather than output data and data that they use to make decisions is much different. There's a lot of other input into making decisions.

Staff: (MS)

Wants reactions to what Doug was saying.

PacifiCorp:

(AB)

Sounds like we're backing away from a voluntary program. Are we pursuing the

rulemaking concept or are we using the rule as terms of reference for a volunteer program?

Staff: (DK)

We're trying to work through a decision making process for what we might require the companies to do. If we are going to throw out this proposal we need to know the specific reasons we have for doing that. The volunteer or pilot program is a good idea to explore.

(KD)

This is at the CR-101 stage and it's like a NOI.

(MA)

To get to the next stage requires us to make a recommendation to the Commissioners in an Open Meeting where the Commissioner's discuss this and direct us to go to the next stage, which is the CR-102 where there would be formal language, but a whole other process for changing language and eventually adopting something.

(MS)

Suggestion that since we have this proposal look at that to see what will work and what won't and make suggestions for different pieces that will work.

What data is most helpful, how much will it cost, and how do we get it.

PacifiCorp:

(AB)

To draw a line, the line is below the system level. The uncertainty is once you go below that line. Then how and where do you collect the data? Rather see it developed than defined.

Staff: (MA)

What we get with this proposal, at the lower level, is a certain kind of information that has value to us and helps answer our questions and meets the needs that we have. Getting information at a different level gives us different information. There are pros and cons to both levels. To go a different path, that data would be different and may not supply us with all the information we would like, even though it still may be useful.

PacifiCorp:

(AB)

Three levels. Level one, the top level would be the IEEE. Level two which goes below the system level, which all companies could provide, but we don't know where that stops. Level three goes further into customer level. Pretty sure of the boundaries between level one and level two because IEEE defines that. What are the boundaries of level two and level three?

Staff: (MA)

We need to know what we lose at each level and is that OK for our needs?

PSE: (MS)

There's a proposal that we may go to another voluntary approach where we work together. Maybe putting this proposal on the shelf. We need to figure out where the level is we want to go.

Staff: (MA)

We haven't determined where it is we want to go, but we're not against that voluntary approach.

Avista:

(DD)

Do the companies have to come up with a report structure, or thresholds, that are the same? We were under the impression that we did not. If that allows the companies to structure their reports at the level that they have data for or that they see that it's better for their company to be structured a certain way, does that address the concern here? If companies are allowed to develop their own thresholds.

Staff: (MA)

There are some specific requirements in this language, such as the implementation plan, that will be developed in conjunction with the Commission and an annual report will be done in a form and format to be designed by the Commission. Which basically means if you're reporting the same kinds of things, it looks the same, etc. Can be quite of bit of difference of what would be reported.

PacifiCorp:

(AB)

Doesn't see a voluntary program leading to a common report. Would be dangerous because you're getting to the lowest denominator rather than the best method of reporting.

Staff: (MA)

Can the companies provide the information that meets Staff's objectives as shown in the graphs presented, using a different means than what is written in the draft language? We need to know if you do give us information in a different manner it's different information and what is the variation from what we're asking for?

(DK)

Our objective is to be able to respond to customer inquires and Commission inquires about how trends are going. Do the companies have ideas for other ways to provide this level of information that address these interests?

PacifiCorp:

(AB)

To get the to customer level of detail, we can get there, but we're some years away and it may force us into a GIS system which we don't intend to put in because it would cost upwards of \$10 million. If we don't have a need for it, a rule like this shouldn't be the business case because then it would force these recovery issues. We have to understand that and look at maybe providing some higher level of information and would that satisfy your objectives?

Staff: (MA)

What would it take for the companies in terms of time, cost, etc., to provide the information that we're looking for?

What can the companies provide at a low cost with less effort?

If it answers the objective, it isn't a problem. We potentially lose something if we don't get the data at this level.

What would it take you to provide this in time, changes to systems, and cost. Secondly, if you can provide it, what is it you would be providing and what would it look like.

(DK)

Staff's perfect case would be what we've drawn up. Is it feasible to have the perfect case and if not what are the specific reasons why not. If there's an alternative that begins to approach this, what would be your perfect case?

PSE: (PP)

\$12-17 million to implement this. It depends on what exactly these threshold issues are. We could come back in a few weeks with a proposal of baseline, and show how we're dealing with reliability and how to deal with customer issues.

Staff: (MA)

Concern, if you defined a broad three areas that doesn't address whether we get the same kind of information then we're passing in the dark again.

PSE: (PP)

Is it the Commission's interest that this information must be reported at a customer level? And if it's not at the customer level that the Commission cannot meet any of those three interests?

Staff: (MA)

I think we would say that it doesn't have to be at that level. But it does provide us with very good information that we would find useful. Tell us what it would take to get there specifically, and how long it might be, what's all involved in getting there. Tell us what



you think would be helpful for us to have.

PSE: (HC)

Concerned about the type of data we're talking about and its relationship to the planning process and the amount of potential deviation that might exist in terms of a set of reports that we're going to be annually explaining and potentially having a totally different method of allocating resources.

### **WAC 480-100-xx2 Annual Reliability Report**

#### **Comments on (a)**

PacifiCorp:

(AB)

Favors annual report and then if you need some subset it could be asked for.

Staff: (DK)

Feels annual reporting is adequate because we're looking for broad trends and not trying to necessarily direct actions.

#### **(c) Customer-Level Reports**

PSE: (PP)

Concern with individual data reporting and casting the spotlight on certain area where customers didn't feel they had problems with the level of reliability. We may develop public and political pressure to do things. May create pressure to do things that may not be the optimal things to be doing.

PacifiCorp:

(AB)

If you declare a number for thresholds then customer depend on that number and it causes problems if you don't meet that.

Staff: (DK)

Something we talked about this morning about allowing the companies the flexibility to establish thresholds based on their own criteria of high-cost area, low-cost area, dense area, rural area, weather inflicted area, non-weather inflicted area.

(MA)

Is it the concern that you would be reporting at a state level that raises it to a higher level?

PSE: (PP)

Concern is that you're creating an issue where there isn't one.

Staff: (DK)

Your company is already doing something to identify problem areas and this is a different tack to doing that but it's not completely dissimilar from the process the company went through to identify where the problem areas are.

PSE: (PP)

It's different than saying that here's a set of fixed criteria to judge against whatever systems, however we want to structure it.

Staff: (MA)

There are two criteria that we put in the rule as being really important and that's the number of interruptions and duration of interruptions. Attempting to find the places of worst reliability for those two criteria. To pull out the worst areas of reliability. We want to understand where the tail is and how big the tail is. It is not part of this proposal to find out about companies investments.

Staff: (MS)

Question on page 7 lines 27-29 of different ways of providing estimates of customers level interruptions.

PacifiCorp:

(AB)

A number of ways you could put in automatic metering with an outage reporting device at extra cost or you could put in one per protected zone, or you could put in a source sub-station monitor that gives you some alarms when things are happening on a network. As you come up the system the level of accuracy may change in terms of the individual customer. Costs are exponential, benefits are linear.

PSE: (HC)

Size of data base for them would be about 10 billion records stored annually. We do not keep a tie between the individual customer record and the outages themselves.

Staff: (DK)

Is there a way if you have your operation database and your customer database to query that about what happened in the past without creating a record that would be stored?

PSE: (HC)

Not to my knowledge.

Staff: (MS)

Question for Avista, if this is something their company can do.

Avista:

(ML)

We're just designing it right now. There's a lot of records and tables that will have to be stored. We're starting from scratch and it's easier. If you're trying to meld two systems then it's a much bigger challenge. Storing data is not a concern for us.

PacifiCorp:

(AB)

I come to 15 billion records system-wide.

Staff: (MA)

That is the kind of information we're looking for. What is it going to take to get this information?

(DK)

I'm not sure everybody is approaching this from the same standpoint looking at the amounts of records from each of the companies.

**RECAP: On tape 3, side b**

**WAC 480-100-xx3 Information Must be Available to the Commission Upon Request**

Staff: (MA)

Would like PacifiCorp to explain their comment about why they think this is unfeasible regarding line 15 on page 12 of draft.

PacifiCorp:

(AB)

Linkage to records of outages to what we store in the customer record. To provide that we'd have to store, within the customer record, this outage occurred at this time on this date and the cause.

Staff: (MA)

Aware that companies have this type of information so is the problem linking it? Or maybe it's even manual.

PacifiCorp:

(CR)

Linking it was the biggest issue. Concern about knowing each component of the system that failed and then naming it. Then the maintenance practices on that component.

Staff:

(MA)

Is the information there, even if it's manual or in different data bases?

PacifiCorp:

(AB)

The information is there, but it's available for the record of the outage but it's not available at the customer level. You're adding complexity.

Staff: (DK)

In (b) are you asking about a record of the corporate maintenance policy, or the maintenance of some individual switch?

(MA)

It's both. Part of it would be, how do you maintain certain kinds of capacitors, if that's what failed.

(DK)

Is the question, what is the corporate policy with regards to maintenance of capacitors? Or is the question, what is the actual history for this capacitor, in particular, right now?

(MA)

It's both. The policy is the corporate policy. The history for a specific failed component, was what was the maintenance history for that component. The big issue would be that even if you're keeping it in a database, can it be linked, is it linked, is there an easy way to link it with the interruptions and so forth.

PacifiCorp:

(AB)

The way that this is written could imply that if a transformer failed, we would take it off the system and replace it, refurbish it, and put it back in the system somewhere else. If the question is, tell me the history of that component, then you've got a difficulty knowing it's come from one place to another. We would hold that kind of record in a database, but we wouldn't link that specific plant component to the outages. We wouldn't be able to do that kind of linkage.

Staff: (MA)

How is Avista incorporating information about individual failed components in their database?

Avista:

(ML)

Every incident has a device in its record so we could determine all the devices that were part of a confirmed incident during the past year. We're keeping information on cause but not sure about any specific information.

Staff: (MA)

This section was to enable us, if we get customer complaints, or if we see information in a report that we'd like to pursue a little further, to do the digging down and pursue a little more specific information. It's not intended that everything that's here would be available at the push of a button or that you would be required to provide it to us all the time. It was to find out what capabilities you had in providing specific information.

PSE: (HC)

There is nothing that is systemically existing for us. But we would be able to do like we have in the past, query the appropriate operational personnel, review the electronic end, hard copy records, to address a limited scope of these.

PSE: (MS)

How is the maintenance practice in the field components helping you get to the overall objectives?

Staff: (MA)

It's probably more of a long term perspective to help us understand the difference between the way that utilities do their work. And to see over time if that makes any difference in terms of reliability.

PacifiCorp:

(CR)

If we want to get at practices and policies so you can have a deeper understanding, I think you can get there by what are the maintenance practices of the company. To get at the things to be able to answer customer inquiries, the type of information we're providing on an outage complaint, would get you there. Maybe this language would be worded to allow for something like that would be "available information regarding more information on the cause of the outage."

We had one outage complaint in the year 2000. We too are concerned that we're building too big of a system to address a few issues.

Staff:

(MA)

If the capability is built into your systems to be able to provide us with a report in section 2 the way we've got it designed here, everything down to line 11 will be available fairly easily, if those capabilities are existing. There's not anything more in lines 1-11 than what exists in all of section 2, except for the establishment that if we feel the need to look further someplace, we need to raise a flag to say we may occasionally come and ask for more information.

PSE: (HC)

That depends a little bit on how you define the aggregate group of customers in a section

of the system. I could see them not being answered at all.

Staff: (MA)

If you were to build the capability into your system to cut off the tails and report the tails and to aggregate them into the circuits, why isn't the capability there to aggregate them into half that circuit, or a section of that circuit, or the lateral on that circuit?

PSE: (HC)

(Drew examples of connectivity database model on flip charts)

Staff: (MA)

Through (a) we weren't trying to create any new information or new capabilities than that which you already have. The data is all there, it's just a matter of where you cut it.

(b) is something different. That's the kind of information we need. It's not really new stuff, it's more formulated stuff. Didn't see this as adding anything new that we don't already ask for from time to time now. Wasn't trying to build a huge new requirement for the companies, in either case.

PacifiCorp:

(CR)

It would help to have something like caveat available information about components. If you're asking us to do this on a manual basis it's much different than having it at the touch of a button. We do this on a manual, as needed, basis.

PacifiCorp:

(AB)

The way this is worded could mean, tell me the history of that transformer in terms of the customers effects. We can tell you about the transformer and we can tell you about these customers, but we can't tell you about this particular transformer and how it affected these customers.

Staff: (MA)

The policies and practices is the focus. It seems like it might be too complex to provide specific information on the history of equipment and customer links. Can companies provide a history of equipment like when it was installed, when was it inspected?

PacifiCorp:

(AB)

Depends on the type of equipment.

Staff: (MA)

Does failed equipment have a number so you can track it?

PacifiCorp:

(AB)

For larger items of equipment we do.

Staff:

(MA)

The reason for this is we're looking for the ability for drilling down in any particular areas and establishing what you can and cannot do. Not intended to create a database that doesn't exist.

PacifiCorp:

(AB)

That section causes problems. The complaint response provides information like that. That's a different thing than saying this is part of a reliability docket and says we're tracking reliability.

Staff: (KD)

As Carole said "on an available basis" would that help solve the problem of this section?

PacifiCorp:

(AB)

They will have to think about it.

**RECAP: Tape 4, side A.**

PSE:

(MS)

Need to move somewhat more into a definition of terms or a background document needs to be agreed upon, understood, and created.

**WRAP-UP**

Staff:

(DK)

We were looking for what you can do and if you can't why and how much it will affect you.

If there is terminology or issues that you still don't understand where Staff is coming from, please ask.

Next steps: Would companies give us some feedback on specific language. It would be a good idea to work on those pilot or group ideas in parallel with this process.

Information that you could provide us gives us assistance in developing the story about

how we got to wherever it is we wind up and having a good solid record of how we got to where we got.

PSE: (PP)

It's helpful to keep focused on what the Commission's interests are. If this isn't the way to be feasible to meet the Commission's interests, we're happy to continue to work with that.

PSE: (MS)

You seem to be making an assumption that those SAIDI and SAIFI relate to customer satisfaction and customer belief that that's the perfect system. These outage reporting processes tie to other business practices within the utility and unbundling those is a very costly process. From an engineering point of view, we can do all this. It's not that we can't do this and not that we won't, but is that what the customers really want and is it cost effective?

Staff: (DK)

Tell us the things you can do and tell us the things you feel you should do and if there's an overlap, that's great. And tell us what it would cost to do these things that we've asked for.

PSE: (PP)

Fundamentally doesn't think we need to burrow down to the individual customer level information for the Commission to get the information they need.

Staff: (MS)

An NOI is the same thing that we're doing here to a large extent. The first stage of any rulemaking is the inquiry stage and that's where we are. We're looking at distribution reliability. How do we figure out baseline data of where we are and how do we measure trends going forward. So if we get the questions of what's happening and is this damaging consumers, we've got information. This is a rule about information, rather than a rule about setting standards or a rule prescribing behaviors.

To the extent that the parties around this table see this need, including Staff, can back off from what we're doing and do some workshops or do some studying and figure the best mode of looking at what we're doing. The decision will be is if the rule is the best way to go forward? The things that are being talked about today, I don't think need to be put in a different forum. We're in a forum where we have the flexibility to examine those. The decision on substance on where we go on examining those, are really the decisions of Doug and Mark and his people. If we do this voluntarily or if we do this by rule, let's figure out what we should be doing and then build the process around it that makes sense.

(KD)



Doug does not need to call Phillip.

Staff: (MA)

In the last workshop we apparently didn't get across what we were trying to get across. So we decided to put it in rule form for ease of understandability. We have not decided that there is going to be a rule nor what would be in it if we are going to have one.

PacifiCorp:

(PP)

Was concerned with receiving a proposed rule in the mail with only a week and a half to respond. Given more time would be able to go through each of the elements and give more detailed feedback.

Staff: (KD)

Staff requests comments by August 31. Mark will contact Avista and IBEW to let them know that comments will be due on the 31<sup>st</sup>.

Adjourned.