



Salt Lake City, Utah 84116

1407 W. North Temple #310

December 14, 2015

***VIA ELECTRONIC FILING  
AND HAND DELIVERY***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: Docket No. 15-035-63  
Docket No. 08-999-05  
2015 Smart Grid Monitoring Report

Pursuant to the Commission's Notice of Comment Period, dated October 19, 2015, in the above referenced matter, the Company herein submits comments in response to comment of parties submitting on November 23, 2015.

In its comments of July 29, 2015, in the above referenced matter, the Division of Public Utilities ("Division") recommended that the Commission reconsider the need and usefulness of the Smart Grid Monitoring Report ("Report") going forward. In comments on September 16, 2015 and October 6, 2015, the Division restated its recommendation that the Commission reconsider the need and usefulness of the Report and stated its preference that the Report be discontinued.

In its comments of July 31, 2015, in this Docket, the Office of Consumer Services ("Office") concurred with the July 29, 2015 recommendation of the Division that the Commission should reconsider the need and usefulness of the Report. In comments provided on November 23, 2015 the Office recommended that the Commission require the Company to file a report every two to three years that contains information and discussion of smart grid activities being implemented or being discussed in its jurisdictions, and discussion of new smart grid developments and technologies including costs and options.

In its comments of November 23, 2015 Utah Clean Energy ("UCE") recommended that the smart grid discussion be shifted to one of modernization including, grid modernization workshops, continued smart grid reporting by the Company, Company reporting on distribution system planning every two to three years, and consideration of a public rulemaking process for interconnection rules.

In comments of August 14, 2015 and October 1, 2015 the Company concurred with the recommendation of the Division that the Report should be discontinued, and further suggested that as circumstances change the reestablishment or smart grid reporting may be initiated by a petition to the Commission of any interested party. On November 23, 2015, the Company recommended discontinuance of the report, and further suggested that if the Commission determines that smart grid reporting should continue on a less frequent and/or modified basis, a technical conference should be scheduled for interested parties to develop a recommendation for the frequency and requirements of future smart grid reporting.

Specifically in response to the November 23, 2015 comments of the UCE, the Company notes that the recommendations of UCE go beyond those established in Docket No. 08-999-05, wherein in the following summarized reporting requirements were established for smart grid reporting, and upon which current reporting is based.

1. All smart-grid related projects and activities the Company is actually engaged in throughout its system;
2. Smart grid-like activities the Company is either considering or has implemented, which accrue some of the benefits of smart grid;
3. Upgrades or changes the Company is making relative to potential smart grid implementation and the related benefit-cost analyses;
4. A list and description of smart grid pilot projects across the country being monitored by the Company;
5. Smart grid related activities and requirements in the Company's other jurisdictions;
6. The interaction of smart grid, rate structure, and customer behavior; and
7. Vehicle to grid applications.

The recommendation for a Commission hosted grid modernization workshop appears unclear as to its purpose and objectives including organization, presenters, and topics and funding. The UCE supports continued smart grid reporting on a modified basis, but presents no specific recommendations for modifications to the existing reporting requirements. Additionally, beyond a call for transparency, the UCE offers no specific recommendations to support its proposal for reporting on distribution system planning.

And finally, the UCE offers no specific rationale for its recommended consideration of a public rulemaking process for interconnection rules. The Company notes that its technical interconnection rules are informed and guided by national standards such as the Institute of Electrical and Electronic Engineers 1547 standard for interconnecting distributed resources. As these standards are updated, the Company reviews and updates internal rules and policy to align with industry standards.

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The Company respectfully reaffirms its recommendation for termination of the Smart Grid Monitoring Report. However, if the Commission determines that smart grid monitoring should continue, the Company recommends that a technical conference should be scheduled for interested parties to develop a recommendation for the frequency and content of future smart grid reporting.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
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Please direct any informal inquiries concerning this matter to Bob Lively at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation

cc: Division of Public Utilities  
Office of Consumer Services

Enclosures