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## ACTION REQUEST RESPONSE

**To:**           **Public Service Commission**

**From:**        Division of Public Utilities  
                  Chris Parker, Director  
                  Energy Section  
                  Artie Powell, Manager  
                  Doug Wheelwright, Technical Consultant

**Date:**        December 8, 2015

**Subject:**     R746-312-16 Public Utility Maps, Records and Reports  
                  R746-313-7 Reporting of Electric Service Reliability

### RECOMMENDATION

The Division of Public Utilities (Division) believes that Cooperative Electric Companies and Special Service Districts are public utilities and should be subject to the reporting rules identified above. The Public Service Commission (Commission) should require these entities to file the appropriate reports with the Division and the Commission.

### ISSUE

On September 21, 2015, the Commission issued an informal Action Request concerning the status of interconnection and electric service reliability reporting from the rural cooperative and special service districts. The Division has reviewed the current reporting and the existing statutes to determine if the Cooperative Electric Companies and Special Service Districts should be complying with the rules.

The Commission included a spreadsheet with the initial Action Request that identified which entities were providing reliability reports. While some entities were providing this reporting, the rule is not being followed by all electric utilities. It is the Division's belief that R746-313-7 should apply to all electric utilities and that reliability reporting should be provided. While some entities may be providing a form of reliability reporting it is not consistent or uniform with all electric utilities.

Net metering reporting from the Coops and Special Service Districts is not currently being provided to the Division or the Commission. It is the Division's belief that R746-312-16(2) should apply to all electric utilities and that net metering interconnections should be provided. With the increase in renewable energy resources and the corresponding increase in net metering customers, reporting from the utilities will become increasingly important. Additional reporting will allow the Commission and the Division to review and evaluate the impact of these renewable energy resources.

#### **CONCLUSION**

The Division believes that Cooperative Electric Companies and Special Service Districts should be subject to the reporting rules identified above. The Commission should require these entities to file the appropriate reports with the Division and the Commission.

CC: Michele Beck, Office of Consumer Services