

October 31, 2023

***VIA ELECTRONIC FILING***

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. 23-R312-01**  
Investigation into Possible Amendment of Utah Admin. Code R746-312, Electrical  
Interconnection  
*Rocky Mountain Power Comments*

On September 8, 2023, the Public Service Commission of Utah (the “Commission”) issued a Notice and Request for Comments regarding whether the existing Electrical Interconnection Rule 746-312 (“Interconnection Rules”) should be updated for the (2018) IEEE 1547 interconnection standard given the significant development in smart grid technologies and inverter capabilities that has occurred since the rule was adopted. PacifiCorp d/b/a Rocky Mountain Power (“RMP”) submits these comments in accordance with the Notice.

RMP supports Commission action to review the Interconnection Rules for possible updates for (2018) IEEE 1547 standards. In addition, RMP believes the Interconnection Rules should be reviewed for potential updates, such as enhancements to the definitions under R746-312-2 to clarify the use of the term “net metering” given that the Commission has authorized two new rate schedules for customers with generation<sup>1</sup> since the rules were established.

Rocky Mountain Power (“RMP”) appreciates the opportunity to provide input to the Commission in this matter and will participate in the process established by the Commission to review the Interconnection Rules.

Questions about these comments can be addressed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward

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<sup>1</sup> Electric Service Schedule No. 136 – Transition Program for Customer Generators (Docket No. 14-035-114, eff. November 15, 2017) and Electric Service Schedule No. 137 – Net Billing Service (Docket No. 17-035-61, eff. October 31, 2020).

**CERTIFICATE OF SERVICE**

Docket No. 23-R312-01

I hereby certify that on October 31, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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**Rocky Mountain Power**

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