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# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

MARGARET W. BUSSE  
Executive Director

CHRIS PARKER  
Division Director

## Reply Comments

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Abdinasir Abdulle, Utility Technical Consultant Supervisor  
Bob Davis, Utility Technical Consultant  
Tamra Dayley, Utility Analyst

**Date:** November 30, 2023

**Re:** **Docket No. 23-R312-01**, Investigation into Possible Amendment of Utah Admin. Code R746-312, Electrical Interconnection

The Division of Public Utilities (Division) filed comments in this docket on October 31, 2023.<sup>1</sup> The Division offers the following reply comments to the Public Service Commission of Utah (Commission) for possible amendments to Utah Administrative Code R746-312, Electrical Interconnection. The Division's reply comments address the comments filed by Utah Clean Energy (UCE), Vote Solar, and Western Resource Advocates (WRA).<sup>2</sup>

## Discussion

The Commission issued its Notice in Docket No. 23-R312-01 seeking comments regarding whether R746-312 should be updated to reflect aspects of the current Institute of Electrical and Electronics Engineers (IEEE) 1547-2018 interconnection standard to maximize the considerable development in smart grid technologies and inverter capabilities that have

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<sup>1</sup> Docket No. 23-R312-01, *Comments from the Division of Public Utilities*, October 31, 2023, <https://pscdocs.utah.gov/Rules/23R31201/330506DPUCmnts10-31-2023.pdf>.

<sup>2</sup> Docket No. 23-R312-01, *Comments from Utah Clean Energy and Vote Solar*, October 31, 2023, <https://pscdocs.utah.gov/Rules/23R31201/330510VtSirUCECmnts10-31-2023.pdf>, and *Comments from Western Resource Advocates*, October 31, 2023, <https://pscdocs.utah.gov/Rules/23R31201/330518WRACmnts10-31-2023.pdf>.

occurred since the current rule was adopted.<sup>3</sup> The Division understood this request to mean that the Commission was interested in updating R746-312 so the *interconnection procedures* reflect new smart grid technologies, not to specifically establish smart inverter settings, ride-through capabilities, or other functional characteristics relating to the physical interconnection of distributed energy resources (DERs). R746-312 already reflects the application of the *most current* IEEE 1547 standard through statute.<sup>4</sup> Rule R746-312 does lack important definitions, outdated application pricing, and seemingly confusing interconnection processes for Level 1, 2, and 3 interconnection approvals as reported in the Division's comments.<sup>5</sup>

In their comments on October 31, 2023, UCE and Vote Solar requested that the Commission direct the Division to lead a workgroup for further discussion on various topics covering smart inverters, smart grids, interoperability, and interconnection of distributed generation resources among other related topics. WRA also suggested that the parties have further discussions on these topics. The Division appreciates the discussion topics proposed by UCE, Vote Solar, and WRA and agrees that these topics are important; however, a workgroup is unlikely to be helpful in resolving any disputes over these items. WRA specifically expresses in its comments that the in-depth discussion surrounding interconnection standards is not within the scope of work for this docket.<sup>6</sup>

The Cohort component of the technical assistance offered by the National Renewable Energy Laboratory (NREL) during the GRID Modernization Collaboration (Docket No. 21-035-16) covered interconnection best practices in detail. However, during those discussions, it was evident that participants had concerns with attempting to determine industry best practices for smart inverter settings, interoperability, and other technologies due to the complexities of individual system requirements throughout the country. The Division included NREL's presentations and links to NREL's meeting recordings in its final

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<sup>3</sup> Docket No. 23-R312-01, *Investigation into Possible Amendment of Utah Admin. Code R746-312, Electric Interconnection*, Notice and Request for Comments, September 8, 2023, <https://pscdocs.utah.gov/Rules/23R31201/32973023R31201narfc9-8-2023.pdf>.

<sup>4</sup> Utah Code Annotated Section 54-15-102(9)(b) refers to "the latest revisions of IEEE 1547, as mentioned."

<sup>5</sup> Docket No. 23-R312-01, *Supra* note 1.

<sup>6</sup> Docket No. 23-R312-01, *Comments from Western Resource Advocates*, October 31, 2023, page 5, <https://pscdocs.utah.gov/Rules/23R31201/330518WRACmnts10-31-2023.pdf>.

report for the GRID Modernization Workgroup progress report and again in its comments for this docket as Attachment B.<sup>7</sup> In that docket, the Commission declined to direct any additional process for discussion on grid modernization.<sup>8</sup>

While the Division has not reviewed all of the numerous resources, studies, and research projects underway at the national laboratories, universities, and third-party think tanks, it is aware of the complexities of trying to define how to implement smart grid technologies across the vast distribution grids and markets throughout the country. Modeling other states' practices, while informative, does not and should not define what is done in Utah.

The Division would participate in a technical conference for the parties to identify best practices for implementing smart grid technologies if proposed. However, the Division is not convinced the workgroup proposed by UCE, WRA, and Vote Solar would be fruitful since the parties could not reach a consensus on similar topics in the GRID Modernization Collaboration. If it chooses, the Commission may want to expand this rulemaking docket to include one or more meetings of the type requested. This would allow parties to freely advocate for rules they think best meet the public interest outside the context of an adjudication or specific request for agency action. After such meetings, the Commission might seek further, more targeted, comments on which to base its decisions about whether and how to amend its rules.

The Division's initial comments and reply comments are guided by its statutory duty to act in the public interest by providing for just, reasonable, and adequate rules, regulations, and understandable rates.<sup>9</sup> Electric service reliability and power quality are correlated to DER interconnection. The current service reliability rule, R746-313, and the proposed power quality rule should be considered in the amendments to R746-312. Proposed amendments to R746-312 should address the procedural aspects of DER interconnection including smart grid technology, smart inverter technology, interoperability, and efficient application review processes found in IEEE 1547, 2800, and UL 1741. Whether and how the rules ought to incorporate more detail about specific settings or other details can be better evaluated by

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<sup>7</sup> Docket No. 21-035-16, *Division of Public Utilities Status Update*, July 27, 2023, <https://pscdocs.utah.gov/electric/21docs/2103516/328964DPUStsRprt7-27-2023.pdf>.

<sup>8</sup> *Id.*, *Correspondence from Gary L. Widerburg* filed September 11, 2023, <https://pscdocs.utah.gov/electric/21docs/2103516/329790CorresWiderburg9-11-2023.pdf>.

<sup>9</sup> Utah Code Annotated Section 54-4a-6, <https://le.utah.gov/xcode/Title54/Chapter4A/54-4a-S6.html>.

the Commission after a process it is fully involved in, as a separate working group occurring outside the Commission's observation is unlikely to be fruitful the second time around. While not exhaustive, the Division offered its proposed amendments to R746-312 contained in Attachment C with its initial comments to make R746-312 more consistent with modern technologies.

## **Conclusion**

While the Division agrees that the topics suggested by UCE, Vote Solar, and WRA are important and currently being widely discussed throughout the country, another workgroup is unlikely to be helpful. Rather, if the Commission wishes to explore more detailed rulemaking to account for the matters raised by those parties, it should participate directly in rulemaking proceedings where parties may present and advocate their positions concerning how the IEEE rules should be incorporated into rule.

cc: Jana Saba, Rocky Mountain Power  
Michele Beck, Office of Consumer Services  
Service List