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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

MARGARET W. BUSSE Executive Director CHRIS PARKER Division Director

Technical Conference Topics

- 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: January 31, 2024

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

The Public Service Commission of Utah (Commission) initially opened this docket to investigate possible amendments to Utah Administrative Code R746-312 (R312), seeking input from interested parties on whether or not R312 should be revised to include the current IEEE 1547 standard.¹ Smart Wave, WRA, Vote Solar/UCE, the Division, and RMP all filed initial comments and reply comments.² While some of the interested parties requested a rigorous review of the R312 through workshops and technical conferences, the Commission narrowed the focus in its notice for a scheduling conference asking for a single technical conference and two rounds of comments.³ The Commission issued its Scheduling Conference Order (Order) on January 11, 2024. In its Order, among other dates for comments, the Commission scheduled a technical conference for March 12, 2024. The

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¹ Docket No. 23-R312-01, *Commission Notice and Request for Comments,* September 8, 2023, <u>https://pscdocs.utah.gov/Rules/23R31201/32973023R31201narfc9-8-2023.pdf</u>.

² Docket No. 23-R312-01, *Investigation into Possible Amendment of Utah Admin. Code R746-312, Electrical Interconnection*, <u>https://psc.utah.gov/2023/09/08/docket-no-23-r312-01/</u>.

³ Docket No. 23-R312-01, *Scheduling Order and Notice of Technical Conference,* January 11, 2024, <u>https://pscdocs.utah.gov/Rules/23R31201/33179123R31201soanotc1-11-2024.pdf</u>.

Commission asked interested parties to submit topics for the discussion by January 31, 2024.⁴

The Division would find it helpful for the Commission to take time during the technical conference to inform the parties what its general areas of concern are, and any information needed to help form its conclusions on the proposed amendments to R312. If the Commission intends to undertake or forego rulemaking with regard to specific aspects of the more general topic, it would be helpful for parties to know this and prepare accordingly.

The Division looks forward to participating in the technical conference and is hopeful that presenters will provide additional information specific to Utah regarding smart inverter integration, storage integration, and interoperability standards. The ultimate goal is an interconnection rule that is understandable and supports safe, reliable, and quality power for Utah consumers at reasonable rates. The Division is interested in learning ways to make the interconnection process more efficient and more timely if possible and suggestions the Commission include some brief discussion of the various application processes.

Summary

In summary, the Division requests that the Commission add some time to the technical conference agenda for any concerns other parties might have with the Level I, II, and III application process language. The Division would find it helpful for the Commission to take time during the technical conference to inform the parties about general areas of concerns and any information needed to help form its conclusions on the proposed amendments to R312.

cc: Service List