



BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>Investigation into Possible Amendment of Utah Admin Code R746-312-Electrical Interconnection</p>	<p>Docket No. 23-R312-01</p> <p>Joint comments of Utah Clean Energy and Vote Solar regarding topics for the March 12, 2024 technical conference</p>
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I. INTRODUCTION

Thank you for the opportunity to provide input on topics to be discussed at the March 12, 2024 technical conference in the above-captioned docket. On January 4, 2024 the Utah Public Service Commission (“Commission”) held a scheduling conference during which parties asked for the opportunity to request topics we would like to see addressed at the upcoming technical conference regarding possible amendments of Utah Admin. Code R746-312. On January 11, the Commission issued a scheduling order and notice of technical conference providing a comment period for parties to identify the topics they intend to discuss or would like to see Rocky Mountain Power (“RMP”) discuss.¹ Utah Clean Energy (“UCE”) and Vote Solar hereby jointly request that:

1. RMP present on the topics enumerated below, and
2. Our organizations are permitted to present on additional enumerated topics in partnership with the Interstate Renewable Energy Council (“IREC”).

II. REQUESTED TOPICS

A. Our organizations request that Rocky Mountain Power present on the following topics:

1. Interconnection rule amendments in Oregon (Docket No. AR 659),² including:
 - i. Current status of rulemaking;

¹ Utah Pub. Serv. Comm., Docket No. 23-R312-01, Scheduling Order and Notice of Technical Conference, available at <https://pscdocs.utah.gov/Rules/23R31201/33179123R31201soanotc1-11-2024.pdf> (Jan. 11, 2024).

² Oregon Pub. Util. Comm., Docket No. AR 659, Interconnection Phase I Rules, available at <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=23699> (Aug. 17, 2023).

- ii. Changes to interconnection rules that were considered; and
 - iii. Changes to interconnection rules that have been implemented, or, if there is no Oregon Public Utility Commission (“PUC”) order yet, the proposed rule changes in the Oregon PUC Staff’s Report.
2. Summary of Rocky Mountain Power’s planned smart inverter settings³, including:
 - i. Planned default reliability settings, and
 - ii. Description of how RMP anticipates that enabling voltage controlling functionality within the inverter will mitigate power quality issues and increase hosting capacity.
 3. Current status of hosting capacity on Rocky Mountain Power’s grid, including:
 - i. Any information that is currently available to installers and the public about hosting capacity across RMP’s system;
 - ii. The number of circuits that are unable to accommodate new distributed generation interconnections without grid upgrades, including:
 1. Locations of these circuits;
 2. Information and data available at these circuits that informs evaluation of hosting capacity availability;
 3. Summary of the most common barriers that prevent interconnection of new distributed generation resources without grid upgrades; and
 4. Summary of interconnection screens that new interconnection requests are most likely to fail.
 - iii. Number or percent of circuits where data about minimum load is available. If this data is not available, when might RMP anticipate that minimum load data will be available?

B. Our organizations request the opportunity to present on the following topics in partnership with the Interstate Renewable Energy Council:

1. Best practices related to interconnection standards and smart inverters.
2. Smart inverter settings and impact on hosting capacity
 - i. As an example: New Mexico Public Regulatory Commission Rule 17.9.568 NMAC.⁴
3. Considerations related to interconnection of inverter-based technologies, including:
 - i. Definition and treatment of energy storage

³ Rocky Mountain Power’s November 30, 2023 comments in Docket No. 23-R312-01 state:

“The Company is currently developing default settings that will require UL 1741 Supplement SB, the testing standard that determines if DERs are compliant with IEEE 1547-2018 (“UL 1741 SB”). The Company plans to implement default reliability settings, as well as enabling voltage controlling functionality within the inverter to mitigate potential power quality issues and increase hosting capacity. The required inverter settings will be published to the Company’s website in a downloadable file format. The implementation timeframe is in development and testing phases and is anticipated to be released in mid-2024.”

⁴ New Mexico Pub. Reg. Comm., Docket No. 21-00266-UT, Final Order, available at <https://irecusa.org/wp-content/uploads/2022/12/NM-Interconnection-21-00266-UT-2022-11-30-Final-Order.pdf> (Nov. 30, 2022).

- ii. Screening and evaluation process for technologies using export control, for example limited export or non-export modes.
4. In support of our request to present in partnership with the Interstate Renewable Energy Council we attest that:
 - i. IREC is a non-profit organization dedicated to accelerating the sustainable utilization of renewable energy resources.
 - ii. IREC has engaged in numerous state interconnection rulemakings over many decades, including before this Commission, and is an expert on Federal Energy Regulatory Commission (“FERC”) Small Generator Interconnection Procedures and best practices for states to adopt IEEE Standard 1547-2018.⁵
5. We respectfully request 60–90 minutes to present on these topics, and will provide a copy of the slide deck to the Commission.

Thank you for the opportunity to provide input on the discussion topics for the March 12, 2024 technical conference on this docket. We look forward to participating and to presenting on the above issues.

Respectfully submitted Jan. 31, 2024,



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⁵ Institute of Electrical and Electronics Engineers Standard 1547-2018, *Standard for Interconnection and Interoperability of Distributed Energy Resources with Associated Electric Power Systems Interfaces*, at <https://standards.ieee.org/ieee/1547/5915/> (last visited Jan. 30, 2024).

CERTIFICATE OF SERVICE

I CERTIFY that on Jan. 31, 2024, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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