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January 31, 2024

Utah Public Service Commission
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
psc@utah.gov

RE: Docket No. 23-R312-01

Investigation into Possible Amendment of Utah Admin. Code R746-312, Electrical Interconnection

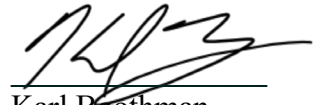
Western Resource Advocates' Comments Regarding Topics for March 12, 2024 Technical Conference

Western Resource Advocates (“WRA”) appreciates the Commission’s inquiry into possibly amending Utah’s interconnection rule to reflect the latest IEEE Standard 1547-2018 (“IEEE 1547-2018”). WRA believes all parties would find value in PacifiCorp presenting on the following topics:

- 1) Ensuring safety, reliability, and power quality on the distribution grid:
 - a. An overview of IEEE 1547-2018 technical requirements, the Company’s proposed default settings for inverters, implementation timeline, and preferred treatment in Utah rules;
 - b. The Company’s plans for incorporating IEEE 1547-2018 communications and interoperability capabilities, DER aggregation, and utility control; and
 - c. The Company’s proposed process for updating or changing default inverter settings as grid conditions and/or distributed energy resource (“DER”) equipment evolves.
- 2) Reducing barriers to DER interconnection:
 - a. A review of PacifiCorp’s current interconnection screens in Utah, and whether that process differs in any of PacifiCorp’s other states.
 - b. Proposed updated language for the explicit inclusion of energy storage, limited- and non-exporting systems in Utah’s interconnection rules; and
 - c. A review of the Company’s hosting capacity analysis (“HCA”) modeling processes, and a roadmap to making HCA data publicly available.

WRA supports updating the existing interconnection rule and appreciates the Company’s willingness to share its expertise. Updating the interconnection rule is an important initial step in developing a responsive and smart distribution grid that can support bulk power system reliability, seamlessly integrate clean energy, and benefit ratepayers. Following a process to update the interconnection rules, we hope the Commission will consider additional technical conferences that explore how to maximize grid and ratepayer benefits of smart inverters.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Boothman', written over a horizontal line.

Karl Boothman
Senior Policy Advisor, Clean Energy
Western Resource Advocates

CERTIFICATE OF SERVICE
Docket No. 23-R312-01

I hereby certify that a true and correct copy of the foregoing was served by email this 31st day of January 2024 on the following:

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