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Clean Air Coalition

November 4, 2008

Utah Public Service Commission
160 East 300 South
Salt Lake City, Utah, 84111

Re: Interconnection Draft Rule; Line 103

Dear Commissioners:

Thank you for the opportunity to comment on this matter, and for the careful attention that the Commission and staff have given to the issue of interconnection in Utah.

In October of 2008, Interstate Renewable Energy Council (IREC), Network for New Energy Choices, Vote Solar and the Solar Alliance prepared a report Freeing the Grid: Best and worst practices in state net metering policies and interconnection standards.¹

Regarding individual system capacity they write

In certain cases, statutory limits on the size of eligible technologies prevent electric customers from correctly sizing a DG system to meet their own demand.

Uniform size limits reduce regulatory confusion, while promoting the widespread population of renewable energy systems. Increasing the eligible facility size for nonresidential systems also could encourage participation in net metering programs by large investors... Several project developers in Oregon, for example, argued that the transactional cost of systems less than 100 kW are too great to attract interest from large investment partners.

Particularly in Utah, where we have such high peak demand for air conditioner loads in the summer, medium scale solar on commercial and civic buildings has the potential to significantly reduce the need for expensive super peak power. This offsetting energy will relieve some of the transmission constraints on our grid during hot weather.

Rocky Mountain Power and Utah customers will benefit by following the recommendation IREC. et al, by increasing the allowed system capacity from 2 MW to 20 MW and expanding interconnection standards to all utilities (i.e., munis and co-ops).

Thank you for your attention to this matter.

Peace,
Kathy Van Dame, Policy Coordinator

¹ Freeing the Grid Oct 2008 http://www.newenergychoices.org/uploads/FreeingTheGrid2008_report.pdf