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Department of Commerce
Division of Public Utilities

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Memorandum

TO: Public Service Commission

FROM: Division of Public Utilities
Philip Powlick, Director
Artie Powell, Energy Manager
Thomas Brill, Technical Consultant

DATE: May 27, 2010

RE: RMP's Standard Interconnection and Net Metering Agreements, Docket No. 10-035-44.

RECOMMENDATION (Approval)

The Division of Public Utilities (Division) recommends approval of Rocky Mountain Power's (Company) proposed standardized interconnection and net metering service agreements for net metering facilities.

ISSUE AND DISCUSSION

On April 27, 2010 the Company filed with the Utah Public Service Commission (Commission) five standard agreement forms concerning interconnection and net metering facilities:

- Interconnection Facilities Study Agreement Level 3 Net Metering Interconnection Review
- Impact Study Agreement Level 3 Net Metering Interconnection Review
- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 1 Interconnection

- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 2 Interconnection
- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 3 Interconnection

These standard agreement forms are intended to comply with the Electrical Interconnection Rule, R746-312 and concern net metering interconnection. Interconnection forms were previously submitted for review and approval, with Division comments found in an April 8, 2010 memorandum. In the April 8 memorandum, the Division recommended “an overall edit and consistency review across all five interconnection agreement forms” as well as resubmitting all five forms. Standard agreement forms concerning non-net metering interconnection have been filed separately in Docket No. 10-035-45.

The Division recommends no substantive changes for the net metering interconnection forms and has identified only minor changes. For example, the second paragraph of the recitals should be formatted flush right, so that all of the forms have a consistent flush right formatting. In the Facilities Study Agreement, “Facility Interconnection” probably should be removed from the footer. In the Service Agreement for Level 1 Interconnection, Section 1.2, “& Light Company” should be removed after “Rocky Mountain Power” and in Section 6.3 “Default” should not be underlined. In the Service Agreement for Level 3 Interconnection, at the third paragraph of the recital, the second “as described in” should be removed. In addition, Section 1.7 requires corrections in its first and third paragraphs.

CONCLUSION

The Division reviewed each of the forms and has found them to be generally in compliance with the Electrical Interconnection Rule, R746-312. The Division recommends approval of the Company’s proposed standardized net metering agreements.

CC: Michele Beck, OCS
Dave Taylor, RMP