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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 Proposed Standardized Non-Net Metering Agreements, Docket No. 10-035-45.

RECOMMENDATION (Approval)

The Division of Public Utilities (Division) recommends approval of Rocky Mountain Power's (Company) proposed standardized non-net metering agreements.

ISSUE AND DISCUSSION

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

- Non-Net Metering Electrical Interconnection Agreement, Level 1, 2 or 3 Interconnection (Interconnection Agreement)
- Non-Net Metering Level 3 Facilities Study Agreement
- Non-Net Metering Level 3 Feasibility Study Agreement
- Non-Net Metering Level 3 System Impact Study Agreement
- Application for Electrical Interconnection Non-Net Metering Level 1, 2 or 3 Interconnection

These standard agreement forms are intended to comply with the Electrical Interconnection Rule, R746-312 and concern non-net metering interconnection. Standard agreement forms concerning interconnection involving net metering have been filed separately in Docket No. 10-035-44. 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. The Division also contacted the Company regarding net metering vs. non-net metering interconnection. At that time, the Company informed the Division that it would also submit a set of non-net metering interconnection forms.

The Division reviewed each of the non-net metering interconnection forms and has found them to be well-written and cleanly formatted, as well as consistent across each of the forms. The Division recommends no substantive changes and has identified only very minor changes, almost all of which concern formatting recommendations. In the Interconnection Agreement, the Division recommends removing “and Upgrades” under Article 4 in the table of contents and in paragraph 3.4.1 adding a comma after “to” in item (2) at “security of, or damage to, the”. In Attachment 6, “Upgrade” should be inserted before “Costs,” with the latter capitalized. In Attachment 6, “to SGIA” should be replaced with “Interconnection Agreement” to match the other attachments. Finally, the Company may wish to make the formatting in the subsections of section 3.4 consistent with the other subsections (compare subsections 1.5.1-1.5.6 or 4.1.1-4.1.2, for example, with 3.4.1-3.4.6). In that case, separate subsection titles would be removed as well as eliminated from the table of contents.

The Division recommends no changes in the Facilities Study Agreement and the Feasibility Study Agreement. For the System Impact Study Agreement, a line space should be inserted after “17.0 Multiple Counterparts”. For the Application for Electrical Interconnection, on page 3, the “Yes” and “No” should be placed after the check-off boxes following the question concerning FERC “Notice of Self Certification”. Regarding formatting, a consistent number of spaces should be found between the check-off boxes and the accompanying words. “kW” probably should be inserted on page 4 on the “Typical Reactive Load” line. Finally, “single phase” and

“three phase” appear in three places in the document (pages 2, 6 and 7) and are presented three different ways.

CONCLUSION

The Division reviewed each of the forms and has found them to be well-written and cleanly formatted, as well as consistent across each of the forms. The Division recommends only minor changes, almost all of which are formatting issues. The Division recommends approval of the Company’s proposed standardized non-net metering agreements.

CC: Michele Beck, OCS
Dave Taylor, RMP