



201 South Main, Suite 2300
Salt Lake City, Utah 84111

April 4, 2011

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Julie P. Orchard
Commission Secretary

Re: In the Matter of the Rocky Mountain Power Proposed Standardized Interconnection and Net Metering Service Agreements and Net Metering Facilities, Docket No. 10-035-44;
In the Matter of the Rocky Mountain Power Proposed Standardized Non-Net Metering Agreements, Docket No. 10-035-45

PacifiCorp, d/b/a Rocky Mountain Power (“RMP” or the “Company”), hereby submits for filing to the Public Service Commission of Utah (the “Commission”) an original and five (5) copies each of the following revised standard forms and agreements applicable to generating facilities pursuant to Utah Administrative Code Rule R746-312, “Electrical Interconnection” (“R746-312” or “Rule”):

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|-------------|--|
| Enclosure 1 | Application for Electrical Interconnection, Generating Facility – Level 1, 2, or 3 Interconnection Review (For Generating Facilities with Electric Nameplate Capacities no Larger than 20 MW) (hereinafter referred to as “Generating Facility Application”) |
| Enclosure 2 | Generating Facility Electrical Interconnection Agreement, Level 1, 2 or 3 Interconnection (hereafter referred to as “Generating Facility Interconnection Agreement”) |
| Enclosure 3 | Interconnection and Net Metering Service Agreement for Net Metering Facility Level 1 Interconnection (“Level 1 Net Metering Interconnection Agreement”) |
| Enclosure 4 | Interconnection and Net Metering Service Agreement for Net Metering Facility Level 2 Interconnection (“Level 2 Net Metering Interconnection Agreement”) |
| Enclosure 5 | Interconnection and Net Metering Service Agreement for Net Metering Facility Level 3 Interconnection (“Level 3 Net Metering Interconnection Agreement”) (Enclosures 3, 4, and 5 collectively hereafter referred to as “Net Metering Interconnection Agreements”) |

These documents (in clean and red-lined versions) are being submitted in response to the Commission's March 23, 2011 Report and Order ("Order"), Docket Nos. 10-035-44 and 10-035-45, approving revisions to RMP's proposed standard electrical interconnection agreements and forms with modifications. It is RMP's understanding from the Order that the proposed standard interconnection forms are approved with an effective date of April 1, 2011 upon the submission of the changes directed by the Order. Order at 23.

I. RMP Response to Order

In the Order, the Commission offered its findings and conclusions on the eight issues addressed by the Company in its revised filing submitted on October 21, 2010. To the extent that the Order directs additional modifications to the standard interconnection forms and agreements, this section of the transmittal letter addresses each of these remaining issues.

A. References to Documents

The Order directed revisions to the Net Metering Interconnection Agreements to include the pertinent links to the standards organizations referenced therein. Order at 7-8. Accordingly, the Company has revised Article 1.5.2 of each of the Net Metering Interconnection Agreements to include links to the websites of the Institute of Electrical and Electronics Engineers ("IEEE") Standards, National Electrical Code Standards, and the Rule.

B. Generating Facility Certified Inverter-Based Facility Standard Interconnection Forms

The Order approved the Company's proposed Certified Inverter-Based Generating Facility Application with the exception that Attachment 5 to the Generating Facility Interconnection Agreement will not apply to certified inverter-based facilities of less than 25 kW. Order at 11. Accordingly, the Company has revised Attachment 5 to the Generating Facility Interconnection Agreement to provide a blanket exemption for certified inverter-based facilities of 25 kW or less from these additional operating requirements.

In addition, the Order directed the Company to restore all references to Level 1 non-inverter-based generating facilities to the Generating Facility Application, finding that the current version of the application results in the exclusion of all other Level 1 facilities besides inverter-based facilities of 25 kW or less. Order at 11. The Commission's intent with this portion of the Order was unclear to the Company, as R746-312-8(1)(a) expressly provides that Level 1 interconnection review requires that the generating facility be inverter-based. In light of that provision, the Company had assumed that all non-inverter-based generating facilities less than 2 MW failing to meet applicable Level 1 review procedures could then qualify for Level 2 interconnection review, pursuant to R746-312-9(1). Nonetheless, the Company has revised the Generating Facility Application to restore these references to Level 1 and account for all non-inverter-based generating facilities, as directed by the Order in order to close any potential regulatory gap, for the sake of administrative efficiency. The Company respectfully requests a final decision by the Commission as to which version of the Generating Facility Application to use on a prospective basis in light of the language in the Rule noted above.

C. Attachment 5 to the Generating Facility Interconnection Agreement

The Order expressed the Commission's opposition to the incorporation of a blanket reference to the Company's "Facility Connection (Interconnection) Requirements for Distribution Systems (34.5 kV and below)" ("Facility Connection Requirements") in Attachment 5 to the Generating Facility Interconnection Agreement. The Order directed the following changes by the Company: (1) revising the definition of "Operating Requirements" in Attachment 1 to the Generating Facility Interconnection Agreement; and (2) revising Attachment 5. Order at 14-15.

Accordingly, the Company has modified both the definition of "Operating Requirements" in Attachment 1 (the "Glossary of Terms") and Attachment 5 as directed in the Order. The Company will include in each individual customer's interconnection agreement only the applicable sections of the Facility Connection Requirements that apply based on the size and type of generating facility. As such, the Generating Facility Interconnection Agreement will clearly identify the specific provisions of the Operating Requirements applicable to the generating facility interconnection.

D. Appendix A

The Order directed revisions to several additional sections of the interconnection agreements. Order at 16-22. Accordingly, the Company has revised the following:

- Article 2.2, "Equipment Testing and Inspection" (formerly Article 2.1), of the Level 3 Net Metering Interconnection Agreement, to be consistent with the language as directed in the Order (p. 18);
- Article 1.3, "Power Purchase," and Article 5.1, "Monthly Billing," of the Net Metering Interconnection Agreements, to eliminate Article 1.3 and simplify Article 5.1;
- Article 5.2, "Special Conditions," of the Net Metering Interconnection Agreements, as suggested in the Order (p. 20);
- Article 2.1, "Initial Review and Additional Review," of the Level 2 Net Metering Interconnection Agreement, and Article 2.1, "Review," of the Level 3 Net Metering Interconnection Agreement (with conforming numbering changes), to be consistent with the language directed by the Order (pp. 20-21);
- Section 7.5, "Force Majeure," of the Generating Facility Interconnection Agreement, to be consistent with the Net Metering Interconnection Agreements; and
- Section 2.2.1 of the Generating Facility Interconnection Agreement.

The Company also performed a final, thorough review of each of these revised forms prior to final submission.

II. Conclusion

Enclosures 1 through 5 above are being submitted as clean and red-lined versions of the revised form or agreement. RMP respectfully requests the Commission's acceptance of the revised standard forms and agreements enclosed herewith as consistent with the Rule and the

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Commission's Order, with approval of the revised forms presented in this filing with an effective date of April 1, 2011.

Please contact me directly at (801) 220-4014 if you have any questions.

Respectfully,

Jeffrey K. Larsen

Vice President/Regulation

cc: Sandy Mooy/UPSC
Dennis Miller/DPU
Cheryl Murray/OCS