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Division of Public Utilities

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MEMORANDUM

To: Public Service Commission

From: Chris Parker, Director
Artie Powell, Energy Section Manager
Thomas Brill, Technical Consultant

Date: April 7, 2011

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

RECOMMENDATION

The Division reviewed Rocky Mountain Power's (RMP or the Company) proposed standardized interconnection service agreements and found that the Company adhered to the Utah Public Service Commission's (Commission) March 23, 2011 Order in these dockets.

ISSUE

On February 1, 2010, the Company filed five proposed standard interconnection forms. On April 8, 2010, the Division filed comments on the proposed net metering interconnection forms and recommended an overall edit/consistency review, followed by resubmission to the Commission. In response to the Division's comments, on April 27, 2010 the Company filed five revised net metering standardized interconnection forms, which were then assigned to Docket No. 10-035-44, and five non-net metering standardized interconnection forms, which were

assigned to Docket No. 10-035-45. On May 27, 2010 the Division filed comments on the resubmitted net metering forms as well as the new non-net metering forms. On August 31, 2010 the Commission recommended substantial changes to the interconnection forms and set a technical conference to discuss the proposed changes to the forms. The Company resubmitted the forms on October 21, 2010. On December 6, 2010 the Division submitted comments and recommended conditional approval of the interconnection forms. The Division also determined that the Company's resubmitted forms were in compliance with the Commission's August 31, 2010 Order. On March 23, 2011 the Commission issued an Order for the Company to make specific modifications and refile its standard interconnection forms. On April 4, 2011 the Company resubmitted the following forms:

- 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) (the Generating Facility Application)
- Generating Facility Electrical interconnection Agreement, Level 1, 2, or 3 Interconnection (the Generating Facility Interconnection Agreement)
- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 1 Interconnection (the Level 1 Net Metering Interconnection Agreement)
- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 2 Interconnection (the Level 2 Net Metering Interconnection Agreement)
- Interconnection and Net Metering Service Agreement for Net Metering Facility Level 3 Interconnection (the Level 3 Net Metering Interconnection Agreement)

The Commission's March 23, 2011 Order approved the Company's proposed standard interconnection forms, assuming the final modifications, with an effective date of April 1, 2011.

FINDINGS

The Division reviewed the resubmitted standard interconnection forms, identified the specific modifications required by the Commission's March 23, 2011 Order, and checked for consistency within and across the interconnection forms. The Division also points out that the Company in its cover letter is seeking clarification for its Generating Facility Application. In particular, the

Company points out that “R746-312-8(1)(a) expressly provides that Level 1 interconnection review requires that the generating facility be inverter-based.” However, the March 23, 2011 Commission Order, at page 11, directs “the Company to restore all reference to Level 1 non-inverter-based Generating Facilities to this application form.” In this regard, a sentence in the instructions paragraph of the Generating Facility Application needs to be removed or corrected. This sentence reads as “This application form applies to all generating facilities except inverter-based generating facilities with a capacity of 25 kW or less.” The Division believes this sentence needs to be removed or corrected.

The Division recommends only changes in formatting or appearance. In particular, in the Level 1 Net Metering Interconnection Agreement and the Level 2 Net Metering Interconnection Agreement there is a space in “Rocky” in section 1.11.4. (The same correction is needed in the Level 3 Net Metering Interconnection Agreement in section 1.13.4.) In the Level 1 Agreement there is an extra line space between sections 3.3.2 and 3.3.3 and a dash in the word “Customer’s” in section 9.1. In the Level 3 Agreement there is an extra period in section 3.4.1.1.

CONCLUSION

The Division finds that the Company is in compliance with the Commission’s March 23, 2011 Order on the Company’s proposed electrical interconnection agreements. The Division has identified a sentence in the instructions paragraph of the Generating Facility Application needs to be removed or corrected. The Division has reviewed the Company’s interconnection forms for the specific modifications found in the March 23, 2011 Commission Order and determined that the Company has made the modifications.

CC Dave Taylor, Rocky Mountain Power
Michele Beck, Office of Consumer Services