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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: The Public Service Commission of Utah

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The Division of Public Utilities
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Date: May 15, 2013

Subject: In the Matter of the Application of Rocky Mountain Power for Approval of Changes to Tariff Schedule No. 38, Qualifying Facility Procedures.
Docket No. 12-035-101

1 Background

On April 15, 2013, Rocky Mountain Power (Company) submitted for Public Service Commission (Commission) approval a revised Utah Schedule No. 38, Sheet No. 38.7. The April 15 filing responds to the Commission's March 21, 2013 order which cited several decisions from its 2005 Order¹ that the Company had not addressed in Schedule 38.

On April 23, 2013, the Commission issued an Action Request for the Division of Public Utilities (Division) to review the Company's April 15 filing for compliance and make recommendations. The response deadline is May 15, 2013. Following are the Office of Consumer Service's (Office) comments and recommendations.

2 Commission's March 21, 2013 Order Requirements

Commission Complaint Process

In its March 21, 2013 order the Commission denied the Company's request to include a

¹ Commission's Report and Order, Docket 03-035-14.

60-calendar-day waiting period prior to a qualifying facility (QF) filing a complaint with the Commission and required the Company “to incorporate in a new Section III of Schedule 38 a reference to the Commission’s informal and formal complaint processes”.

Office Response

In the April 15, 2013 filing the Company complies with this requirement by including on First Revision of Sheet No. 38.7, Section III, a link to the Commission’s dispute resolution process. The reference to a 60-calendar-day waiting period has been removed.

Website Checklist

The Company was ordered to develop a checklist or table which incorporates the decision in the 2005 Order and allows QF developers to view the process for determining indicative pricing.

Office Response

The Company has created and posted on its website a checklist noting information required in order to obtain indicative pricing. The checklist contains a number of links. One particular link² is to Rocky Mountain Power’s website and two others are to the Commission orders related to qualifying facilities, Schedule 38. The Office notes that we were not able to make the link to the Company’s website work by clicking on them. We did have some luck with copying the link and pasting it into the internet browser. The Company includes links to the Commission’s 2005 and 2006 Orders³, although not to the ordering paragraphs in those orders.

The Office recommends that the Company include in the tariff a link to the checklist or site location. An appropriate location could be:

I. Process for Negotiating Power Purchase Agreements, Section B.

The Office also recommends that the Company examine the links provided in the checklist to ensure they are working properly.

The Office offers no opinion as to the usefulness of the items listed on the checklist. QF applicants may be a better resource for determining the value of the specific checklist details.

Commission-Approved Electrical Interconnection Rules

The Commission noted that Schedule 38 had not been updated, materially, since 2006 and since that time the Company’s distribution interconnection procedures had been

² This link is used in seven of the nine checklist items.

³ In its March 21, 2013 Order the Commission suggested “at a minimum, the Company cite or provide a direct link to the *ordering paragraphs* in our 2005 Order and any relevant orders on reconsideration. [emphasis added]

approved.⁴ The Company was directed to update the last paragraph on Page 38.7 Section 11.B, which addresses interconnections on the Company's distribution system.

Office Response

As required the Company updated the information in the last paragraph of Section II. Process for Negotiating Interconnection Agreements, B. The paragraph states that applications for interconnection at the distribution level will be processed in accordance with Utah Admin. Code R746-312. A link to the Company's Commission-approved interconnection forms and agreements is also provided.

3 Additional Office Comments

In reviewing this filing the Office used the links provided as well as a "start from scratch" method. We attempted to approach the application/information process as a new QF might without any documentation or known web links. Beginning at the PacifiCorp/Rocky Mountain Power website searching for information regarding QFs we did not find the drop down selection process to be very intuitive. The Office recommends that the Company consider ways or headings that will enable QF applicants to more easily navigate the website to obtain information regarding requirements and payments for their project.

4 Recommendation

The Office recommends that the Commission require the Company to:

- 1) Include in the tariff a link to the checklist located on the Company's website; and
- 2) Check and monitor the links provided in the checklist to ensure they are working correctly.

⁴ Docket Nos. 10-035-44 and 10-035-45.