

December 23, 2016

***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: Gary Widerburg
Commission Secretary

Re: Docket No. 14-035-114
Compliance Filing for December 14, 2016, Order Granting Waiver

Pursuant to the Public Service Commission of Utah's Order Granting Waiver ("Order"), issued December 14, 2016, in the above-referenced docket, PacifiCorp d/b/a Rocky Mountain Power ("the Company") submits this compliance filing. Specifically, the Order granted the Company's request for a temporary waiver of the timeframes in the administrative rules related to the processing of Level 1, 2, and 3 Interconnection Reviews.¹ The Order also requires:

PacifiCorp shall, no later than December 23, 2016, file in this docket a proposed plan identifying the actual number of interconnection applications that are backlogged for processing, the rate as which interconnection applications continue to be filed, and PacifiCorp's plan and proposal for timeframes to process all pending interconnection applications.

In its Motion for Emergency Waiver of Levels 1, 2, and 3 Interconnection Review Processing Timeframes, the Company represented that it had received 4,622 interconnection review applications ("Applications") between November 10 and December 9, 2016. Of these, 55 percent, or 2,542, Applications were received on and after December 5, 2016.

As of December 21, 2016, the Company has timely completed the review required under R746-312-8(2)(c) for 1,155 Applications of those submitted on or after December 5. The Company continues to work through a backlog of 1,387 Level 1 Applications received through December 9, 2016. After December 9, 2016, the Company has received 318 Applications, with approximately 60 new Applications being submitted each day, which is at a rate slightly more than average during 2016.

¹R746-312-8(2), R746-312-8(4), R746-312-8(5), R746-312-9(2), R746-312-9(3), R746-312-9(4), and R746-312-10(2).

In order to continue to work through the backlog and process incoming Applications, the Company proposes to process pending and new Level 1 Applications in accordance with the temporary timeframes set forth in Table 1 below. The extended temporary timeframes for certain rule requirements will enable the Company to process the Applications as efficiently as possible. The Company further proposes that the temporary waiver for timeframes related to Level 2 and Level 3 Interconnection Reviews be rescinded; the Company will resume processing the Level 2 and Level 3 Applications in accordance with the administrative rules.

Rule	Regulatory Timeline	Proposed Temporary Timeline
Level 1:		
R746-312-8(2)(a)	PacifiCorp date and time stamp each interconnection request on the day it is received.	No change
R746-312-8(2)(b)	PacifiCorp within three business days after receipt of an interconnection request must provide to the requester an acknowledgment of the application.	No change
R746-312-8(2)(c)	PacifiCorp within 10 business days after receipt of an interconnection request must evaluate the request for completeness and notify the requester as to whether the application is complete.	20 business days
R746-312-8(2)(c)	Requester who has submitted an incomplete application must, within 10 business days of notification, provide all missing information or request an extension of time to do so.	20 business days
R746-312-8(2)(d)	PacifiCorp has 15 business days from the date on which it deems an application complete to determine whether the proposed generation system can be safely and reliably interconnected, and to notify the requester of that determination.	30 business days
R746-312-8(2)(e)	PacifiCorp within five business days of approving an interconnection application, must provide the requester with all procedures, requirements, and associated forms.	No change
R746-312-8(2)(g)	PacifiCorp must issue a denial within 25 days after receipt of the application or the application is deemed approved.	50 business days
R746-312-8(4)	PacifiCorp has 10 business days after receipt of all required documentation to conduct any Company-required inspections or tests, to set any required meter, and to issue final approval for parallel operation. If PacifiCorp fails to meet the 10-day deadline, it is deemed to have waived the witness test.	No change

R746-312-8(5)	If PacifiCorp considers the result of a witness test to be unacceptable, it must give the interconnection customer at least 30 business days to resolve the deficiencies.	No change
LEVEL 2:		
R746-312-9(2)	PacifiCorp has same deadlines that apply to the processing of Level 1 interconnection applications.	No change
R746-312-9(3)	PacifiCorp has deadlines that apply where a Level 2 interconnection customer agrees to a supplemental review.	No change
R746-312-9(4)	PacifiCorp has 10-day deadline for a Level 2 interconnection customer to notify PacifiCorp of anticipated testing and inspection dates.	No change
LEVEL 3:		
R746-312-10(2)	PacifiCorp has same deadlines that apply to the processing of Level 1 and Level 2 interconnection applications.	No change

The Company proposes to file a report on or by March 1, 2017, to provide a status update on the backlog and number of new Applications received during this time. At that time the Company would make any further recommendations on the administrative rule timeframes and waiver. Lastly, the Company reiterates its commitment to use its best efforts to process all Applications in a reasonable time frame, despite the waiver.

Informal inquiries may be directed to Bob Lively at (801) 220-4052.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation

cc: Service List – Docket No. 14-035-114