



We Partner to Build the New Clean Energy Economy

January 27, 2017

VIA HAND DELIVERY

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket No. 14-035-114— In the Matter of the Investigation of the Costs and Benefits of PacifiCorp’s Net Metering Program

Background

On December 13, 2016, Rocky Mountain Power (“the Company”) requested temporarily relief from the obligation to comply with interconnection timelines as described in R746-312-8 through R746-312-10 for interconnection applications received on and after December 5, 2016. In this motion, the Company notes that 4,622 interconnection applications were submitted between November 10 and December 9, compared to an average of approximately 1,000 applications per month earlier in the year. Of these applications, more than half were submitted between December 5 and December 9. The Company also proposed 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.

The Company further proposed temporary timeline extensions for certain rule requirements for Level 1 applications. The proposed temporary timelines allow the Company a reasonable amount of additional time to review the unusually high number of interconnection applications.

Comments

Utah Clean Energy believes that the Company’s proposed temporary timeline extensions, as well as its proposal to file a status update on or by March 1, 2017, are reasonable, and provides the following comments and recommendations. The Company’s petition to extend administrative rule timeframes raises the question of whether Utah’s interconnection standards warrant additional review to ensure that they are up to date and in line with best practices.

Interconnection requirements outline the technical and contractual requirements for connecting distributed energy generators to the grid in order to ensure they are connected safely and in a timely manner. Interconnection standards can also help the utility accommodate increased



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penetrations of distributed generation. Utah's interconnection standards were last updated April 2010. Although Utah's interconnection standards represented best practices at the time, the rooftop solar market has grown significantly, as have technological improvements and advanced inverter capabilities. Since 2010, national guidelines for interconnecting solar installations have evolved to address growing interest in renewables, accommodate increasing penetration of solar on the grid, and deal with new technologies while maintaining grid reliability. Streamlined interconnection processes can further allow for a more efficient interconnection process, resulting in time and cost savings for the utility, translating into benefits for customers. For example, electronic processing of applications, streamlining internal utility processes, and clear and transparent reporting requirements, among other changes, have improved the efficiency of the interconnection process and resulted in savings in other states.

We appreciate the Company's efforts to process interconnection applications in a timely manner, and suggest that the March 1 status update include sufficient information and detail to ensure that the Commission and stakeholders have a comprehensive understanding of the nature of any backlogs, challenges, process inefficiencies, or other issues impacting interconnection timelines.

Sincerely,

A handwritten signature in cursive script that reads "Kate Bowman".

Kate Bowman,
Solar Project Coordinator
UTAH CLEAN ENERGY