



1407 W North Temple, Suite 310
Salt Lake City, Utah 84114

November 28, 2017

VIA ELECTRONIC FILING

Utah Public Service Commission
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 - In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

Enclosed for electronic filing is Rocky Mountain Power's Motion for Emergency Waiver of Levels 1 and 2 Interconnection Review Processing Timeframes in the above referenced docket.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
Jana.saba@pacificorp.com
yvonne.hogle@pacificorp.com
utahdockets@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle R. Steward
Vice President, Regulation

CC: Service List - Docket No. 14-035-114

R. Jeff Richards (7294)
Yvonne R. Hogle (7550)
Emily Wegener (12275)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
E-mail: robert.richards@pacificorp.com
E-mail: yvonne.hogle@pacificorp.com
E-mail: emily.wegener@pacificorp.com

Attorneys for PacifiCorp

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of the Costs and Benefits of PacifiCorp’s Net Metering Program	Docket No. 14-035-114 MOTION FOR EMERGENCY WAIVER OF LEVELS 1 AND 2 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES
---	--

Pursuant to Utah Admin. Code R746-312-3(2) and R746-1-109, Rocky Mountain Power, a division of PacifiCorp (“Company” or “Rocky Mountain Power”), hereby requests and moves the Commission for an expedited order temporarily relieving the Company of the obligation to comply with certain timeframes required by R746-312-8 through R746-312-9 to process Levels 1 and 2 Interconnection Review applications (the “Applications”) received between November 1 through 14, 2017. The specific processing timeframes for which the Company seeks a temporary waiver are as follows:

Rule	Regulatory Timeline	Proposed Temporary Timeline
Level 1:		
R746-312-8(2)(c) ¹	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)(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)(g)	PacifiCorp must issue a denial within 25 days after receipt of the application or the application is deemed approved.	50 business days
LEVEL 2:		
R746-312-9(2)(c) ²	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
R746-312-9(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

On August 28, 2017, Rocky Mountain Power filed a settlement stipulation in this docket (“Stipulation”), entered into with multiple parties including the Office of Consumer Services, the Division of Public Utilities, Utah Clean Energy, and Vivint Solar, Inc., among other parties (“Parties”), with the Commission. As part of the Stipulation, the Parties agreed to, and the Commission approved, a new cap for the net metering program at the cumulative generating capacity of all customer generation systems reflected in the completed interconnection applications submitted to the Company on or before 12:00 a.m. November 15, 2017 (“NEM Cap Date”). Then-current net metering customers and customers who had submitted a complete

¹ The Company is not proposing a temporary change related to R746-312-8(2)(c)(ii).

² The Company is not proposing a temporary change related to R746-312-9(2)(c)(ii).

interconnection application to the Company on or before the NEM Cap Date and were interconnected within twelve months from the date of approval of the interconnection application, would remain on the then-current net metering program and their applicable rate until December 31, 2035.

In response to the Stipulation, the Company has seen an unprecedented increase in the number of Applications received by the Company as customers and solar companies made a concerted effort to submit Applications prior to the NEM Cap Date. Indeed, during the two week period of November 1 through November 14, the Company received 4,820 Applications. Of these, the majority were submitted November 13-14, 2017. In comparison, the Company received a total of 9,666 Applications from January through October of 2017.

The substantial increase in Applications during this short timeframe hinders the Company's ability to satisfy the processing timeframes imposed by the Interconnection Rules. The Company does not have the resources to process the deadlines set forth in the applicable rules according to these timeframes. The Company has reassigned employees to help with the processing and developed more streamlined procedures to respond to the growing number of Applications it has been receiving this year. Even with these resources and efficiencies, the Company cannot adequately accommodate this potentially short-term influx of new Applications in a timely manner. If immediate action is not taken by the Commission to address this situation, a substantial number of Applications will be deemed approved under the interconnections rules in R746-312, regardless of whether those Applications are complete, regardless of whether the proposed generation facility at issue in each Application could be interconnected safely or reliably, and regardless of whether other appropriate technical, mechanical, and systematic requirements have been satisfied to allow proper interconnection. Thus, compliance with the

interconnection rules referenced above in R746-312 would impose an undue hardship on the Company that outweighs the benefits of that rule. Indeed, if an order is not entered immediately to address this situation, the principal purposes of R746-312—i.e. to provide timely, safe and proper interconnection of private generation facilities—would be undermined.

For these reasons, the Company requests an expedited Order from the Commission temporarily waiving Rocky Mountain Power's obligation to comply with the processing timeframes required by the specific aforementioned provisions of R746-312.8 and R746-312.9 for Applications received by 12:00 a.m. of November 15, 2017.

The Company also notes that certain timeframes in the administrative rules may be implicated in 2018 by the large number of Applications received by the Company from November 1 through 14, 2017. Specifically, R746-312-8(4) requires the company to conduct any inspection or tests, set the meter, and issue final approval for parallel operation within 10 business days after receipt of all required documentation. If there are a significant number of inspections required in the same timeframe in the future after the installations are completed for the Applications received during November 1 through 14, 2017, then the Company may need to seek a temporary waiver again if the workload exceeds available resources.

Accordingly, the Company respectfully requests this Commission to immediately enter an Order suspending the Company's obligation to comply with the specific processing timeframes identified above.

RESPECTFULLY SUBMITTED this November 28, 2017.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER



R. Jeff Richards
Yvonne R. Hogle
Emily Wegener
Rocky Mountain Power

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

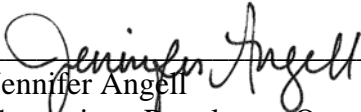
I hereby certify that on November 27, 2017, a true and correct copy of Rocky Mountain Power's **MOTION FOR EMERGENCY WAIVER OF LEVELS 1 AND 2 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES** was served by email on the following Parties in Docket No. 14-035-114:

Division of Public Utilities	
Chris Parker (C) William Powell (C) Erika Tedder (C)	ChrisParker@utah.gov wpowell@utah.gov etedder@utah.gov
Utah Office of Consumer Services	
Michele Beck (C) Cheryl Murray (C) Bela Vastag (C)	mbeck@utah.gov cmurray@utah.gov bvastag@utah.gov
Assistant Utah Attorney General	
Patricia Schmid (C) Justin Jetter (C) Robert Moore Steven Snarr	pschmid@agutah.gov jjetter@agutah.gov rmoore@agutah.gov stevensnarr@agutah.gov
UCARE	
Michael D. Rossetti Stanley T. Holmes	solar@trymike.com stholmes3@xmission.com
Sierra Club	
Travis Ritchie Casey Roberts Derek Nelson	travis.ritchie@sierraclub.org casey.roberts@sierraclub.org derek.nelson@sierraclub.org
Energy Strategies	
Kevin Higgins Neal Townsend	khiggins@energystrat.com ntownsend@energystrat.com
Utah Solar Energy Association	
Elias Bishop Chad Hofheins	ebishop@utsolar.org chad@synergypowerpv.com
Ballard Spahr	
Jerold G. Oldroyd Theresa A. Foxley	oldroydj@ballardspahr.com foxleyt@ballardspahr.com
Parsons Behle & Latimer	
William J. Evans Vicki M. Baldwin	bevans@parsonsbehle.com vbaldwin@parsonsbehle.com

Brickfield, Burchette, Ritts & Stone, P.C.	
Peter J. Mattheis Eric J. Lacey	pjm@bbrslaw.com elacey@bbrslaw.com
Boehm, Kurtz & Lowry	
Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq.	kboehm@BKLLawfirm.com Jkylercohn@BKLLawfirm.com
Utah Clean Energy	
Sarah Wright Kate Bowman Sophie Hayes (C)	sarah@utahcleanenergy.org kate@utahcleanenergy.org sophie@utahcleanenergy.org
USAF Utility Law Field Support Center	
Capt. Thomas A. Jernigan Mrs. Karen White	Thomas.jernigan@us.af.mil Karen.white.13@us.af.mil
PacifiCorp, dba Rocky Mountain Power	
Data Request Response Center D. Matthew Moscon Jana Saba Yvonne Hogle Daniel Solander	datarequest@pacificorp.com dmmoscon@stoel.com jana.saba@pacificorp.com yvonne.hogle@pacificorp.com daniel.solander@pacificorp.com
Salt Lake City Corporation	
Tyler Poulson	tyler.poulson@slcgov.com
Hatch James & Dodge	
Gary A. Dodge	gdodge@hjdllaw.com
Interstate Renewable Energy Council, Inc.	
Sara Baldwin Auck	sarab@irecusa.org
Vivint Solar	
Stephen F. Mecham	sfmecham@cnmlaw.com
Parsons Kinghorn Harris, P.C.	
Jeremy R. Cook	jrc@pkhlawyers.com
E-Quant Consulting LLC	
Robert Swenson	Roger.swenson@prodigy.net
Keyes, Fox & Wiedman LLP	
David Wooley	Dwooley@kfwlaw.com
IBEW Local 57	
Arthur F. Sandack, Esq	asandack@msn.com

Callister Nebeker & McCullough	
Brian W. Burnett, Esq.	brianburnett@cnmlaw.com
J. Kennedy & Associates	
Stephen J. Baron	Sbaron@jkenn.com
Greenberg Traurig	
Meshach Y. Rhoades, Esq.	rhoadesm@gtlaw.com
Wal-mart Stores	
Steve W. Chriss	Stephen.chriss@wal-mart.com
SW Energy Efficiency Project	
Christine Brinker	cbrinker@swenergy.org
Summit County	
David L. Thomas	dthomas@summitcounty.org
Western Resource Advocates	
Jennifer Gardner Nancy Kelly Penny Anderson	jennifer.gardner@westernresources.org nkelly@westernresources.org penny.anderson@westernresources.org
Energy Freedom Coalition of America	
Bruce M. Plenk James M. Van Nostrand	solarlawyeraz@gmail.com jvannostrand@kfwlaw.com
HEAL Utah	
Michael Shea	michael@healutah.org
Auric Solar, LLC	
Elias Bishop	elias.bishop@auricsolar.com
Salt Lake County	
Donald H. Hansen Jennifer Bailey	dhansen@slco.org jenbailey@slco.org
Sunrun, Inc.	
James M. Van Nostrand Bruce M. Plenk	jvannostrand@kfwlaw.com solarlawyeraz@gmail.com
Vote Solar	
Rick Gilliam	rick@votesolar.org
Legend Ventures, LLC (dba Legend Solar, LLC)	
Nathan K. Fisher	nathanf@fisherhunterlaw.com

Intermountain Wind and Solar, LLC	
Brian W. Burnett, Esq. Dale Crawford Doug Shipley Mark Allred Mark Richards Doug Vause	bburnett@kmclaw.com dale@imwindandsolar.com doug@imwindandsolar.com mark@imwindandsolar.com markrichards@imwindandsolar.com dougvause@imwindandsolar.com
Park City Municipal Corporation	
Luke Cartin Thomas A. Daley	Luke.Cartin@parkcity.org tdaley@parkcity.org



 Jennifer Angell
 Supervisor, Regulatory Operations