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Division of Public Utilities

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COMMENTS

To: Public Service Commission of Utah

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Bob Davis, Utility Analyst
Myunghee Tuttle, Utility Analyst

Date: March 12, 2018

Re: Docket No. 14-035-114 – Investigation of the Costs and Benefits of PacifiCorp’s Net Metering Program. **Emergency Waiver for Level 3 Interconnection Review Processing Timeframes.**

RECOMMENDATION (APPROVAL)

The Division of Public Utilities (Division) has reviewed PacifiCorp’s dba Rocky Mountain Power (RMP) motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes for the Net Metering Program and recommends the Commission approve the motion. The Division’s recommendation is dependent upon RMP providing the Commission with a queue management plan within 45 days of receiving approval of the motion.

ISSUE

On March 2, 2018, RMP filed Motion for Emergency Waiver of level 3 Interconnection Review Processing Timeframes. On March 6, 2018, the Commission issued a Notice of Filing and Comment Period whereby any interested party may submit comments on or before March 13, 2018. The Division respectfully submits the following comments in support of its recommendation.

BACKGROUND

On September 29, 2017, the Commission issued Order Approving Settlement Stipulation in Docket No. 14-035-114.¹ The record for this matter is lengthy and, for brevity, will not be repeated here in its entirety.² The Settlement Stipulation resulted in RMP receiving many applications, overloading its resources for interconnection review. On November 28, 2017, RMP filed a motion with the Commission for Emergency Waiver of Level 1 and Level 2 Interconnection Review Processing Timeframes.³ In its order on November 30, 2017, the Commission granted the waiver and ordered RMP to file a progress report with the Commission no later than January 26, 2018.

On January 26, 2018, RMP filed its required update with the Commission demonstrating that it complied with the Commission's approved temporary timeframes for Level 1 and Level 2 applications.⁴

On March 2, 2018, RMP filed Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes. According to RMP, it received a higher than expected number of Level 3 applications. In addition to the Level 3 applications received by RMP, several Level 2 interconnection applications transitioned to Level 3 applications.

DISCUSSION

Utah Administrative Code Rule 746-312-10 (1), defines a generating facility as a Level 3 facility if: a) the generating facility has a capacity of greater than 2 megawatts (MW), but less than 20 MW; b) is not certified; or c) failed Level 1 and Level 2 interconnection review requirements.

Level 3 interconnections require a System Impact Study (SIS). The SIS is to be completed within thirty business days under Utah Administrative Code Rule 746-312-10 (2)(f)(iii). Accordingly, RMP states in its motion that system impact studies are complicated and, by their very nature,

¹ Order Approving Settlement Stipulation, Docket No. 14-035-114, September 29, 2017.
<https://psc.utah.gov/2016/06/20/docket-no-14-035-114-2/>.

² Public Service Commission of Utah, Docket No. 14-035-114. <https://psc.utah.gov/2016/06/20/docket-no-14-035-114-2/>.

³ Public Service Commission of Utah, Docket No. 14-035-114.
<https://pscdocs.utah.gov/electric/14docs/14035114/298131RMPMotEmerWaivLv1,211-28-2017.pdf>.

⁴ RMP's Report on the Status of Processing the Affected Application, January 26, 2017.
<https://pscdocs.utah.gov/electric/14docs/14035114/299486RMPEmerWaivStatRep1-26-2018.pdf>.

increase in number when the pending studies involve the same substation and/or circuit.

Additionally, overlapping substations and/or circuits severely limit RMP's ability to review the studies concurrently.⁵

RMP claims it received a total of 20 Level 3 applications from November 2017 through January 2018 alone, all requiring an independent SIS. According to RMP, the average engineering time required for each SIS is approximately 80 hours. RMP is requesting the Commission grant it a waiver of R746-312-10 (2)(f)(iii) for the duration of the transition program enrollment and that the process be temporarily modified⁶ allowing a queue to be used to process Level 3 applications. RMP proposes to assign a NMQ# (queue position) on a first-come, first-served basis once completed documentation and associated payment/deposit are received.

In situations when there are multiple applications on the same distribution feeder, or in areas where projects may impact multiple feeders that have earlier requests, RMP will review projects in the order received as expeditiously as possible. This staged review, according to the Company, is necessary as the outcome of one project study directly impacts the assumptions and feeder characteristics of the next study.

The Division agrees with RMP that the quality of reviews is critical to ensure accurate and thorough reviews of the proposed system. The Division supports the use of the proposed queue system to expedite processing Level 3 applications. However, the Company provides no detail on how it plans to manage the queue other than to indicate that applicants' SIS will be performed on a first-come, first-served basis once completed documentation and associated payment/deposit are received. To ensure a reasonable process that is in the public interest, the Division recommends that Company file a detailed queue management plan within 45 days of receiving approval of the proposed queue system and work with interested parties to develop the queue management plan prior to filing. At a minimum, the queue management plan should include RMP filing a status report, at least on a quarterly basis, on how the queue is functioning.

⁵ RMP motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes, March 2, 2018, at page 2.

⁶ The Division assumes RMP is referring to the Settlement Stipulation of the program enrollment ending when the cap is hit or at the conclusion of the Transition Customer Docket No. 17-035-61.

The status report should include information such as the date when the application went into the queue, how long it took to process the application, the completion of the SIS, the date of approval, etc.

With the limited information provided in RMP's motion of how the queue will be managed, the Division reserves the right to make further comments on the use of the queue for processing Level 3 applications. The Division is willing to work with other interested parties in the development of the queue and how it should be managed.

CONCLUSION

The Division has reviewed RMP's motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes and concludes that the motion is reasonable and in the public interest. Therefore, the Division recommends the Commission approve RMP's motion. The Division also requests the Commission require RMP to file a queue management plan within 45 days of receiving approval of the motion.

CC Joelle Steward, RMP
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