

Utah Clean Energy Comments:

Rocky Mountain Power Requested Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes

TO: Public Service Commission of Utah
FROM: Utah Clean Energy
DATE: March 3, 2018
RE: Docket No. 14-035-114, In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

INTRODUCTION

Utah Clean Energy appreciates the opportunity to review Rocky Mountain Power's ("Company's") request for an expedited order temporarily relieving the Company from meeting the timeframes required by R746-312-10 (2)(f)(iii). This rule describes the Company's obligations when completing a System Impact Study ("SIS") for Level 3 Interconnection Review applications ("applications"). Utah Clean Energy (UCE) agrees that the quality of System Impact Studies is critical to ensure safe interconnection of the proposed systems. UCE also recognizes the Company is dealing with an influx of interconnection applications, a small percentage of which require a Level 3 Interconnection Review. However the Company has not provided adequate information to demonstrate that an open-ended waiver of the timeframes required by R746-312-10 (2)(f)(iii) through the duration of the transition program enrollment is necessary or justified. Instead, Utah Clean Energy recommends the Company be granted an additional 15-30 business days (for a total of 45-60 business days) to complete a System Impact Study and distribute the results to the interconnection customer and that this waiver be in effect for six months.

Furthermore, the Company has not provided sufficient information to justify the creation of a queue process. A six month extension of R746-312-10 (2)(f)(iii) to allow the Company an additional 15-30 business days to complete a System Impact Study will make it easier for the Company to complete these studies on time. If there are specific studies that cannot be completed within this timeframe, Utah Clean Energy recommends that they be dealt with on a case by case basis.

A waiver of interconnection timeframes for the duration of the Transition Program is not necessary or reasonable.

The Company is requesting a ‘temporary’ waiver of the timeframes required by R746-312-10 (2)(f)(iii) through the duration of the Transition Program enrollment to process an influx of interconnection applications that require a System Impact Study. However, the Company has not provided information sufficient to understand the nature of the problem, for example:

- What is causing the increase in Level 3 interconnection reviews?
- What sorts of screen failures are sending Level 1 or 2 projects to Level 3 review?
- Are projects requiring Level 3 review more frequently?
- What the Company has done to remedy the issue thus far?
- Is the Company is limited by the number of staff able to complete a SIS, resources necessary to complete a SIS, or another factor?

The Company is requesting a “temporary” waiver that could be in place for several years. The Transition Program will be open to new customers until either the Transition Cap is reached or the Commission issues a final order in the Export Credit Proceeding, as described in the Docket

14-035-114 Settlement Stipulation.¹ A hearing for the Export Credit Proceeding (Docket No. 17-035-61, Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity) is currently scheduled for September 28 – October 2, 2020. As such, the Company's requested 'temporary' waiver would in fact be in place for up to 30 months.

The Company has received a total of 20 Level 3 applications from November 2017 through January 2018, compared to a total of 11 applications from January 2016 through October 2017.² It is likely that this influx of applications is directly related to the closure of the Net Metering (NEM) Program to new customers as of November 14, 2017 and will not likely continue. For comparison, Rocky Mountain Power also received a large number of Level 1 and 2 interconnection applications in the final months of 2017. In response, the Company filed a Motion for Emergency Waiver of Level 1 and 2 Interconnection Review Processing Timeframes noting that this increase was in response to the Stipulation, which ended the NEM program. During the two week period of November 1 through November 14, the Company received 4,820 applications, whereas the Company received a total of 9,666 applications from January through October 2017.³ The NEM program was closed to new customers beginning November 15 2017, and it's our understanding from meetings with the Company that since that date there has been a decrease in the number of interconnection applications received by the Company. Given the drop in the number of interconnection applications, there is reason to believe that the Company will

¹ Docket No. 14-035-114, Settlement Stipulation, August 28, 2017. Paragraph 15.

² Docket No. 14-035-114, Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes, March 2, 2018. Page 3.

³ Docket No. 14-035-114, Motion for Emergency Waiver of Levels 1 and 2 Interconnection Review Processing Timeframes, November 28, 2017. Page 3

not continue to receive a higher than usual number of Level 3 interconnection applications, so a temporary six month extension of the timeframes is appropriate.

Finally, it is important for customers to have certainty and transparency about the anticipated duration of interconnection reviews. Delays in project timelines can have a significant impact on the economic viability of a project. The Company has proposed to “use best efforts” to process Level 3 applications within 30 days for the next two and a half years,⁴ which provides customers with very little certainty as to the timeline of their application.

Instead, UCE recommends that the Company be granted an additional 15-30 business days (for a total of 45-60 business days) to complete a System Impact Study and distribute the results to the interconnection customer and that this waiver be in effect for six months. It is critical to give customers and solar developers some certainty about the anticipated timeline for a System Impact Study, rather than relying on “best efforts”. This will provide the Company with additional time to process the 20 outstanding Level 3 applications and still provide customers with certainty about the anticipated completion date of their interconnection review.

The Company has not provided information to demonstrate a queue is necessary

Utah Clean Energy recognizes that it may occasionally be necessary for the Company to review certain System Impact Studies sequentially because the outcome of one study directly impacts the assumptions and feeder characteristics that will determine the results of the next study.

⁴ Docket No. 14-035-114, Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes, March 2, 2018. Page 4.

However, the Company has not provided information to justify the need for a queue, for example:

- How frequently does the Company receive Level 3 interconnection applications that require a sequential review?
- What are the circumstances that require System Impact Studies to be completed sequentially?
- How many of the 20 pending applications meet these criteria and can't be reviewed concurrently?

Furthermore, the Company has not explained whether Level 3 applications which are not impacted by other pending applications would be included in or impacted by the queue, or described how the queue would be managed. At this time, the creation of a queue is needlessly complicated. A six month extension of R746-312-10 (2)(f)(iii) to allow the Company an additional 15-30 business days to complete a System Impact Study will make it easier for the Company to complete System Impact Studies which require sequential review on time. If there are specific studies that cannot be completed within this timeframe, Utah Clean Energy recommends that they be dealt with on a case by case basis.

The interconnection process may require revisions in the future

The challenges the Company has encountered in completing Level 1, 2, and 3 interconnection applications demonstrate that there may be a need for improvements to the interconnection process at some point in the future. Utah's interconnection policy was last updated in 2010, and since that time there have been numerous market and technological advances related to distributed generation which may warrant revisions or updates to Utah's interconnection policies.

We do not presume that revisions to Utah’s interconnection standards are necessary at this time, but Utah Clean Energy hopes to continue working with the Company and stakeholders to consider revisions to interconnection standards, if it is determined that revisions are warranted.

CONCLUSION

Utah Clean Energy recommends the Commission reject the Company’s Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes. Instead, Utah Clean Energy recommends the Company be granted an additional 15-30 business days (for a total of 45-60 business days) to complete a System Impact Study and distribute the results to the interconnection customer and that this waiver be in effect for six months.

UTAH CLEAN ENERGY

/s/ Kate Bowman

CERTIFICATE OF SERVICE

Docket No. 14-035-114

I hereby certify that a true and correct copy of the foregoing was served by email this 13th day of March, 2018, on the following:

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