

March 19, 2018

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> 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  
**Emergency Waiver for Level 3 Interconnection Review Processing Timeframes**

On March 6, 2018 the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period ("Notice") requesting comments on Rocky Mountain Power's ("Company") March 2, 2018 Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes ("Motion"). On March 12, 2018, the Division of Public Utilities ("Division") and Utah Clean Energy ("UCE") each filed comments. The Company appreciates the review and comments of the interested parties. Consistent with the Notice, the Company submits reply comments below.

***Response to Division's Comments***

The Division recommends approval of the Company's application conditioned upon the Company filing with the Commission an interconnection queue management plan within 45 days of receiving Commission approval of the Motion. The Division was generally supportive of a queue system; however, it noted that the Motion included limited information about how the queue would be managed and requests the Company work with interested parties to develop a queue system and file a detailed plan. As part of this plan, the Division requests the Company file status reports on a quarterly basis that, at minimum, include the following information:

- Date when the application was placed in the queue
- How long the application took to process
- Completion of the System Impact Study ("SIS")
- Date of approval

The Company agrees with the Division's request, consistent with its Motion, as follows "[f]urther, the Company recommends working with interested parties to more fully develop a new queue system for Level 3 interconnection review processes that could be incorporated into modifications to the rule." The Company appreciates the Division's willingness to participate in the development of the queue.

### ***Response to UCE's Comments***

UCE does not agree that a waiver of the processing timeframes should be granted for the duration of the Transition Program, recommending the Company be granted an additional 15-30 business days (for a total of 45-60 business days) to complete a SIS for a period of six months. UCE also claims that the Company has not provided sufficient justification that a queue system is necessary and states that 15-30 additional business days should be granted, and that specific studies can be handled on a case-by-case basis.

#### Timeframe for the Waiver

For now, the Company agrees to a six-month waiver, as proposed by UCE. The Company agrees there is a possibility that the deceleration of Level 1 and 2 applications the Company has recently experienced from the surge caused by the Schedule 135 sunset date, could also mean a deceleration of Level 3 applications. However, the Company is also aware of the possibility that it could receive a growing number of Level 3 of applications because the Company's system is becoming increasingly saturated with customer generation facilities already connected to its system. Concurrently, the Company would also expect SIS to continue to increase in complexity as circuit penetration increases. However, as the Company works with stakeholders to develop a queue system, the Company will make a filing requesting additional time if it appears it will be necessary.

#### Queue System

UCE recommends a temporary extension of the current processing deadlines instead of a queue system. Level 3 applications are more complex in nature and the Company believes a queue system could be developed in a manner that more efficiently processes the Level 3 interconnections, with differentiation for applications that must be reviewed sequentially and those that do not. Over half of the applications are within the system where circuits, stations and the transmission system is approaching maximum export capacities. Both the generation interconnection queue and the net metering interconnection queue are managed by the same engineering resources because both types of projects must be considered as systems on the circuits. The Commission is well aware of the current backlog related to the Company's generation interconnection queue; thus, it is not surprising that the Company would be experiencing a delay in its net metering interconnection queue, in particular since all projects must be studied sequentially.

### ***Conclusion***

Both the Division and UCE agree that quality SIS are crucial to the safe interconnection of the proposed systems. Adequate review of the interconnection of the proposed systems should be properly balanced with customer certainty and transparency. The Company believes these objectives can be balanced by a well-developed queue system and commits to work with parties to develop a plan. The Company respectfully requests the Commission grant the Company's request for a waiver of Utah Administrative Code Rule 746-312-10 (2)(f)(iii) for a period of six months, subject to the Company working with stakeholders to develop a queue system for

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processing applications within 45 days of Commission approval. During the six-month waiver, the Company commits to filing quarterly status reports as recommended by the Division.

Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive style with a large initial "J" and "S".

Joelle R. Steward  
Vice President, Regulation

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

## CERTIFICATE OF SERVICE


I hereby certify that on March 19, 2018, a true and correct copy of Rocky Mountain Power's **REPLY COMMENTS** was served by email on the following Parties in Docket No. 14-035-114:

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