

Utah Solar Energy Association Reply Comments:

Rocky Mountain Power Requested Motion for Emergency Waiver of Level 3

Interconnection Review Processing Timeframes

TO: Public Service Commission of Utah

FROM: Utah Solar Energy Association

DATE: March 19, 2018

RE: Docket No. 14-035-114, In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

Regarding Rocky Mountain Power's (Company's) request for an order relieving the Company from the timeframes required by R746-312-10 (2)(f)(iii), the Utah Solar Energy Association (USEA) concurs with the comments made by Utah Clean Energy (UCE) dated March 3, 2018. USEA agrees that the quality of System Impact Studies is critical but we do not see that the Company has demonstrated a burden from Level 3 Interconnections. Furthermore, USEA supports UCE's argument that an open-ended waiver of the timeframes required by R746-312-10 (2)(f)(iii) throughout the Transition Program is not necessary or justified. The 15-30 additional days to complete a System Impact Study suggested by UCE is reasonable and will allow for greater certainty and predictability for interconnection customers. Certainty is an important component of the investment and development process- when a customer does not have certainty that their review will be done within thirty days, it can result in missed deadlines, unanticipated budget impacts,

failure to procure equipment on time, and impacts to tax credit eligibility. All of which can lead to higher costs for customers or even the cancellation of a project.

USEA also agrees that the Company has not provided sufficient information to justify the creation of a queue process. USEA agrees that a six month extension of R746-312-10 (2)(f)(iii) allowing the company the additional 15-30 days for a System Impact Study should be sufficient for the Company to complete these studies in a timeline and thorough manner. UCE makes a reasonable suggestion that if there are specific studies that cannot be completed within this timeframe that they are dealt with on a case-by-case basis.

In conclusion, USEA supports UCE in recommending the Commission reject the Company's Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes. USEA recommends the Company be granted an additional 15-30 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 Solar Energy Association

/s/ Ryan Evans