

Utah Clean Energy 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 Clean Energy
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

REPLY COMMENTS

On March 2 2018 Rocky Mountain Power (“the Company”) filed a motion for emergency wavier of Level 3 interconnection review processing timeframes. Utah Clean Energy filed comments in response on March 13 2018 and has recommended 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. This extension should provide the Company with additional time to complete the outstanding System Impact Studies.

The Division of Public Utilities (“the Division”) also filed comments on March 13 2018 and recommended that the Commission approve the Company’s motion provided that the Company files a queue management plan with 45 days of receiving approval for the motion. As described in our initial comments, Utah Clean Energy does not agree with the Division’s conclusion that it is reasonable to relieve the Company of the obligation to complete a System Impact Study within 30 days for the entire duration of the Transition Program (a period of up to two and a half years). The Company has not provided information that indicates the influx of Level 3 interconnection

applications is likely to continue. We are concerned that approval of the Company's motion, allowing the Company to "use best efforts" to process applications within 30 days, would create uncertainty about the anticipated duration of interconnection reviews for customers. Delays that impact the anticipated project timeline can be costly for customers if they result in missed internal deadlines or impact the customer's ability to procure equipment, meet tax incentive timeframes, or meet budget timelines, for example. While the recent influx of Level 3 interconnection applications warrants a temporary extension of the Level 3 interconnection review processing timeframes, we reiterate that the Company has not provided adequate information to demonstrate that an ongoing waiver of Level 3 interconnection timeframes through the duration of the transition program enrollment is necessary or justified.

We appreciate the Division's recommendation that, if approved, the Company provide the Commission with a queue management plan within 45 days of receiving approval of the motion. Utah Clean Energy agrees that the Company has not provided enough information about how they propose to manage a queue of Level 3 interconnection applications, but does not agree that a queue is necessary based on the information the Company has provided. The Company has not provided information about the frequency and circumstances of Level 3 interconnection applications requiring sequential review, and we are concerned that a queue process and an open ended requirement that the Company "use best efforts" to process level 3 interconnection applications within 30 days is unreasonable and will create unnecessary and potentially costly delays for Level 3 interconnection applications including those that do not require sequential review. We respectfully request that the Company provide information responsive to the questions posted in our initial comments to determine whether a queue is necessary and provide

information about how the Company will ensure that review of Level 3 interconnection applications that do not require a sequential review will be identified and able to proceed in a timely manner.

Utah Clean Energy continues to recommend the Company is allowed an additional 15-30 business days to complete a System Impact Study for six months to allow the Company to resolve the 20 outstanding System Impact Studies. We would also support a meeting or technical conference with the Company and other interested parties to discuss the questions posed in our initial comments and to work together to identify additional solutions that allow the Company to complete System Impact Studies without creating unnecessary delays for customers.

UTAH CLEAN ENERGY

A handwritten signature in cursive script that reads "Kate Bowman". The signature is written in black ink and is positioned above a horizontal line.

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 19th day of March, 2018, on the following:

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