

August 10, 2018

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th 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

See attached the Company’s Motion for Temporary Waiver of Level 3 Interconnection Review Processing Timeframes in the above referenced docket.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward
Vice President, Regulation

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

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program	Docket No. 14-035-114 MOTION FOR TEMPORARY WAIVER OF LEVEL 3 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES
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Pursuant to Utah Admin. Code R746-312-3(2) and R746-1-109, Rocky Mountain Power, a division of PacifiCorp (“Company” or “Rocky Mountain Power”), hereby requests and moves the Commission for an order temporarily relieving the Company from meeting the timeframes required by R746-312-10 (2)(f)(iii) (“Required Timeframes”) to complete and provide a System Impact Study (“SIS”) for Level 3 Interconnection Review applications (the “Applications”). In support of its request, the Company states as follows.

BACKGROUND

On March 2, 2018, the Company filed an Emergency Waiver of Level 3 Interconnection Review Processing Timeframes under applicable rules requesting an emergency extension of the Required Timeframes on the following bases. First, the Company received a large volume of applications from November 1 through 14, 2017, due to the November 15, 2017 sunset of the net metering program under tariff Schedule 135. To illustrate, from January 2016 through October 2017—a 22-month period—Rocky Mountain Power received a total of **eleven** Level 3

applications; from November 2017 through January 2018, the Company received a total of 20 Level 3 applications, all requiring an independent SIS. Because this was a temporary problem, the Company requested an emergency waiver of the Required Timeframes. The Commission partially granted the request on March 21, 2018 (“Order”), providing an extension of 30 days, for a total of 60 days, of the Required Timeframes for six month period.

Second, due to size and scope, Level 3 interconnections are more complex than Levels 1 and 2 interconnections and require a more extensive review, which is more of a permanent issue. For example, Level 3 interconnections require the Company to perform a SIS which must be completed and provided to the customer within thirty business days under Utah Admin. Code R746-312-10 (2)(f)(iii). SIS are complicated and, by their nature, increase in number when the pending studies involve the same substation and/or circuit. Overlapping substations and/or circuits severely limit the Company’s ability to review the studies concurrently. As an increasing number of Level 3 customer systems connect to the Company’s system, the review of the Level 3 applications get more complex. To address these concerns, the Company recommended working with interested parties to more develop a possible queue format system for Level 3 interconnection review processes that could be incorporated into modifications to the rule. In the Order, the Commission directed the Company to work with the DPU and interested parties to develop a queue management system and related procedures and either submit that system for PSC consideration, or provide a status update on the activities and progress of the process, within 45 days of the Order.

The Company, DPU, and interested parties met on May 14, 2018 for a level 3 QMS workshop. The Company developed and presented a QMS straw proposal. The discussions have continued through various meetings, conference calls, and emails among the parties, and the Company filed status updates to report the progress on May 2, 2018, June 6, 2018, and July 10,

2018. The Company appreciates the engagement of the parties and valued the feedback provided in the discussions.

COMPANY REQUEST

As the Company worked with parties in developing the QMS, parties expressed concern over customer certainty and transparency about the anticipated duration of their interconnection reviews. Also, some questions arose over whether or not a permanent QMS is necessary considering the volume of new Level 3 applications return to a more manageable level once the bottleneck of applications received during the first half of November 2017, are processed. Although the increasing complexity of Level 3 reviews is not a temporary issue and possibly warrants a permanent change to the way applications are processed, the Company shares the parties' concerns that any such changes should appropriately balance the need for adequate review with customer certainty.

During these discussions, the Company has also studied the processing of the current Level 3 applications under the temporary extension granted in the Order. At this time, the Company believes that lengthening the Required Timeframes could be enough to alleviate the safety concerns related to increasing complex Level 3 interconnections instead of a more complex queue system proposal. Before proposing more substantive changes to the way the Company processes the Level 3 applications, it requests that the Commission grant an additional six months extension of the deadline so that the impact can continue to be studied. This will provide the Company with one year's worth of experience and data, which can be used to determine the proper remedy for the safety concerns, and additional steps can be taken as appropriate. If allowing 60 days to process SIS continues to alleviate the Company's concerns, the Company can file an application for a permanent change in the rules. Conceivably, the

Company may determine that, once the bottleneck from the November 15, 2017 deadline is fully processed, 30 days is once again adequate.

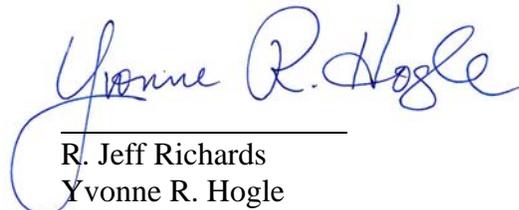
CONCLUSION

WHEREFORE, the Company respectfully requests the Commission issue an order granting an additional six month extension of the Required Timeframes beginning September 21, 2018 through March 21, 2019. The Company will continue to file quarterly status reports like the one filed June 19, 2018. At the end of the extension, the Company will file a final report that will contain the Company's recommendations.

RESPECTFULLY SUBMITTED this August 10, 2018.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER,



R. Jeff Richards

Yvonne R. Hogle

Rocky Mountain Power

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2018, a true and correct copy of Rocky Mountain Power's **MOTION FOR TEMPORARY WAIVER OF LEVEL 3 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES** was served by email on the following Parties in Docket No. 14-035-114:

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