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Division of Public Utilities

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REPLY COMMENTS

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Artie Power, Energy Section Manager
Abdinasir Abdulle, Utility Analyst
Charles Peterson, Utility Consultant

Date: December 14, 2015

Re: Docket No. 15-035-63, comments on proposal to eliminate or modify smart grid reporting.

RECOMMENDATION (Eliminate Reporting Requirement)

As discussed in its comments filed with the Commission on July 29, 2015 and in subsequent comments, the Division continues to believe that the Commission may want to reconsider whether the annual production of this report is worth the time and effort of the Company and is of real value to the regulatory community.

The Division's preference is that the report be discontinued.

REPLY COMMENTS TO UCE

Pursuant to the Public Service Commission's request for comments dated October 19, 2015, Utah Clean Energy (UCE) filed comments dated November 23, 2015 supporting continuing

some form of annual smart grid reporting “given rapid changes in technology.”¹ UCE does not specifically identify any technologies that it believes are cost effective that the Company is not considering. UCE takes the opportunity to request expanding regulatory activities such as the Commission holding “grid modernization workshops” and requiring biennial reporting of the Company’s distribution system plans. Finally, UCE notes that the Company mentioned in its Smart Grid Report that the Company is updating its distribution system interconnection policy. UCE suggests that the Commission initiate a rule-making process to review these and approve these interconnection rules.

The Division opposes expanding the regulatory activities as requested by UCE. UCE provides no specific evidence for such expansions, but rather vaguely refers to “rapid changes” in technology and public policy. If UCE believes that there exist specific cost-effective technologies that are not being adequately considered in the DSM process, in the Company’s IRP, or some other forum, then the Division would be happy to facilitate UCE making a presentation of such technologies to regulators, the Company, and other interested parties.

The Division does believe the request for Commission review of the Company’s revisions of its distribution interconnection process and rules may have merit. The Division is uncertain that a formal rule-making process is necessary. However, the Commission may want to open a docket to make such a review.

CONCLUSION AND RECOMMENDATIONS

The Division continues to recommend that the Commission reconsider the need and usefulness of the Smart Grid report going forward. The Division’s preference is that the report be discontinued.

CC: Bob Lively, RMP
Michele Beck, OCS
Sarah Wright, UCE

¹ UCE Comments, page 4.