



We Partner to Build the New Clean Energy Economy

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

September 29, 2017

Utah Clean Energy Reply Comments Re: Docket No. 16-035-36 – In the Matter of the Application of Rocky Mountain Power to Implement Programs Authorized by the Sustainable Transportation and Energy Act

Dear Public Service Commission,

On August 15, 2017, Rocky Mountain Power (The Company) filed an Application to Implement Innovative Utility Programs Authorized by the Sustainable Transportation and Energy Plan Act (Application), asking the Public Service Commission (Commission) to approve expenditures of \$450,000 for a Smart Inverter Program and \$250,000 for a Microgrid Program. Utah Clean Energy submitted comments related to the proposed Smart Inverter Program and submits the following reply comments in response to recommendations filed by Western Resource Advocates (WRA).

Microgrid Project.

UCE did not provide initial comments related to RMP's proposed microgrid project, but we recognize that microgrids will play a critical role in the grid of the future. Increased use of renewable energy, distributed generation, and energy storage will require increasingly sophisticated control technologies and a more agile energy system. Microgrids can provide diverse benefits above and beyond energy generation and integration, including enhanced community resiliency, coordination and management of diverse distributed generation resources, and improved power quality. There are communities in Utah that suffer from poor power quality due to insufficient or outdated infrastructure, or lack access to affordable power due to their remote geographic location. Furthermore, several local governments in Utah have goals to source all of their communities' energy from renewable resources. Microgrids could provide a scalable, flexible solution to address a variety of power supply and quality issues.

WRA proposes, and UCE supports, a follow up program to RMP's proposed microgrid program that results in a production microgrid that is designed to provide power to a critical facility. There are communities in Utah who will be interested in serving as a pilot location for these programs and we support development of a project that demonstrates the power supply and quality benefits of a microgrid and serves as a learning opportunity for the utility and participating stakeholders.

Finally, UCE notes that new energy technologies can be used to solve problems which have historically been solved through traditional infrastructure investment, as is the case with RMP's Solar and Energy Storage Technology Program, also funded through STEP. For this reason, we recommend that the findings from this and other innovative technology programs are incorporated into utility planning processes in order to identify least-cost opportunities to use new technologies to resolve utility issues.

With best regards,

/s/ Kate Bowman

Kate Bowman, Solar Project Coordinator
Utah Clean Energy

CERTIFICATE OF SERVICE

I certify that on September 29, 2017, a true and correct copy of the foregoing was served upon the following as indicated below:

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