



State of Utah  
Department of Commerce  
Division of Public Utilities

MARGARET W. BUSSE  
*Executive Director*

CHRIS PARKER  
*Director, Division of Public Utilities*

SPENCER J. COX  
*GOVERNOR*

DEIDRE M. HENDERSON  
*Lieutenant Governor*

## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

**Date:** September 24, 2021

**Re:** **Docket No. 21-035-29** – Rocky Mountain Power’s Fourth Annual Sustainable Transportation and Energy Plan Act Program Status Report –Compliance Filing.

### Recommendation (Acknowledge with Recommendation)

The Division of Public Utilities (Division) reviewed Rocky Mountain Power’s (RMP) final compliance filing (Report) for the Panguitch Solar and Battery Storage Project. Based on its review, the Division recommends the Commission acknowledge RMP’s Report and direct RMP to provide a more detailed report in its final STEP annual status report.

### Issue

On August 25, 2021, RMP filed with the Commission its final report for the Panguitch Solar and Battery Storage Project. On August 30, 2021, the Commission issued its Notice of Filing and Comment Period. Any interested person may submit comments on or before September 24, 2021 and reply comments on or before October 12, 2021.<sup>1</sup>

<sup>1</sup> See <https://pscdocs.utah.gov/electric/21docs/2103529/3201332103529nofacp8-30-2021.pdf>.

## Background

RMP proposed a 650 kilowatt (kW) solar array combined with a 1 megawatt (MW) - 5 megawatt-hour (MWh) battery storage project on a distribution circuit emanating from the Panguitch Substation located in Panguitch, Utah under the STEP Program. The project was designed to correct voltage issues experienced during peak loading conditions on the Sevier–Panguitch 69 kilovolt (kV) transmission line that feeds the Panguitch Substation radially from Sevier. The general solution for transmission line issues of this type is to use capacitive voltage correction factors. RMP exhausted its ability to correct the issues with capacitive voltage correction factors prior to the Project. The solar and battery storage project, if successful, would alleviate peak loading on the Panguitch power transformer and improve voltage conditions on the upstream 69 kV sub-transmission line.

The Commission approved the Panguitch Project in 2016 under the STEP Program in Phase One. RMP projected that the Panguitch Project would become operational in 2020. Additional funding for the project was later approved by the Commission in 2019 by \$1.75 million to cover additional parts and labor costs.<sup>2</sup>

On April 29, 2021, RMP filed its Fourth Annual Sustainable Transportation and Energy Plan Act (STEP) Program Status Report. In reply comments filed June 17, 2021, RMP committed to providing its final report on the Panguitch Solar and Battery Storage Project once it was completed.<sup>3</sup> RMP filed its compliance report on August 25, 2021.

## Discussion

RMP engineers likely learned valuable lessons that other areas within RMP's system experiencing similar issues might benefit from and provide solutions to help maintain system reliability as peak loads and distributed generation increases throughout the state.

The Division seeks greater detail on how the solar and battery storage have alleviated the substation issues over a 24/7 time-frame since the project's in-service date. Also, the Division requests that RMP provide a more robust conclusion in the 2022 final STEP annual status report

---

<sup>2</sup> See Commission Order, Docket No. 16-035-36, February 6, 2019, page 11, ¶ 3.  
<https://pscdocs.utah.gov/electric/16docs/1603536/3065761603536o2-6-2019.pdf>.

<sup>3</sup> See Rocky Mountain Power's Reply Comments, Docket No. 21-035-29, June 17, 2021, page 2,  
<https://pscdocs.utah.gov/electric/21docs/2103529/319146RMPrplyCmnts6-17-2021.pdf>.

explaining how the Supervisory Control and Data Acquisition – SCADA, back-up generation, and Investment Tax Credits were overlooked in the initial design of the project and not reported until now.

## **Conclusion**

The Division reviewed RMP's August 25, 2021 final compliance filing for the Panguitch Solar and Battery Storage STEP Project. The Division appreciates RMP's summation of the project but found the Report lacking sufficient detail, including how the project resolves the system issues for which it was designed. The Division recommends that RMP provide greater detail of its findings from the Project in its fifth and final STEP Annual Status Report in April of 2022.

The Division recommends the Commission Acknowledge RMP's final report for the Panguitch Solar and Battery Storage Project with the above recommendation.

cc: Joelle Steward, RMP  
Jana Saba, RMP  
Michele Beck, OCS