



State of Utah
DEPARTMENT OF COMMERCE
Committee of Consumer Services

To: The Public Service Commission of Utah

From: The Committee of Consumer Services
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Date: March 28, 2007

Subject: Utah Committee of Consumer Services' Comments on the Division of Public Utilities Recommendations Regarding EPAct 2005 Amendments to PURPA – Interconnection Standard – Docket No. 06-999-03.

1. Background

On March 1, 2007, the Division of Public Utilities (Division) submitted to the Public Service Commission (Commission) its recommendations regarding the Interconnection Standard associated with the Energy Policy Act 2005 (EPACT 2005) Amendments to PURPA. The PURPA Interconnection Standard is as follows:

Each electric utility shall make available, upon request, interconnection service to any electric consumer that the electric utility serves. For purposes of this paragraph, "interconnection service" means service to an electric consumer under which an on-site generating facility on the consumer's premises shall be connected to the local distribution facilities. Interconnection services shall be offered based upon the standards developed by the Institute of Electrical and Electronics Engineers; IEEE Standard 1547 for Interconnecting Distributed Resources with Electric Power Systems, as they may be amended from time to time. In addition, agreements and procedures shall be established whereby the services are offered shall promote current best practices of interconnection for distributed generation, including but not limited to practices stipulated in model codes adopted by associations of state regulatory agencies. All

such agreements and procedures shall be just and reasonable, and not unduly discriminatory or preferential.

On March 6, 2007, the Commission issued a request for comments responding to the Division's recommendations by March 28, 2007. This is the Committee of Consumer Services' (Committee) response to the Division's recommendations.

2. Division Recommendations

Although Utah law addresses interconnection and the development of distributed generation (DG), the Division concludes it is not an equivalent standard. The Division recommends the Commission adopt the PURPA Standard as written and open an Interconnection Docket.

As described by the Division, the purpose of the interconnection docket would be to define terms such as "best practices", explore opportunities and barriers for small, medium, and large DG projects, and review model interconnection codes to determine if any would be beneficial to Utah. The interconnection docket would coordinate with the proposed investigation into net metering and provide an opportunity to establish measurements to determine utility compliance.

3. Committee Response

Based on our review of PacifiCorp's tariffs, the Committee's assessment is that PacifiCorp currently has provisions in place to "make available, upon request, interconnection service to any electric consumer that the electric utility serves." Regarding the requirement that interconnection services be offered based upon the IEEE Standard 1547 for interconnected distributed resources with electric power systems, we believe that this standard is not met.¹ Therefore, we agree with the Division that Utah does not have an equivalent standard to the PURPA proposed interconnection standard.

The Committee appreciates the Division's analysis and the inclusion of the potential benefits from distributed generation. The Committee concurs that there are benefits that can be achieved through DG and supports an investigation to determine the appropriate interconnection requirements to facilitate increased participation. However, in making a determination as to barriers that could be removed to promote DG, it is essential that the Commission carefully consider costs to non-participants. The interests of DG owners, the utility and non-participating customers must be balanced.

4. Recommendation

The Committee recommends that the Commission accept the Division's recommendations to adopt the Interconnection Standard as written and open an investigative docket.

¹ Although Attachment 3 to the Small Generator Interconnection Procedures (SGIP) does specify the IEEE 1547 Standard, the Small Generator Interconnection Agreement (SGIA) and Schedule 135 both reference IEEE requirements but they do not specify the IEEE 1547 Standard.