

Utah Rural Electric Association

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Utah Public Service Commission
A Touchstone Energy Cooperative

Dixie Escalante REA Flowell Electric Garkane Energy Moon Lake Electric Wells Rural Electric
Bridger Valley Electric Empire Electric Mt. Wheeler Power Raft River Electric
Deseret Power Uintah Basin Telephone

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September 29, 2009

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City UT 84111

RE: Notice of Proposed New Rule: Electrical Interconnection, Docket 09-R312-01; DAR file No. 32881; Reference: R 746-312-

Attention: Sandy Mooy, Contact Person

On September 1, 2009, the Public Service Commission of Utah ("Commission") opened DAR File No. 32881 providing notice of proposed rule changes to interconnection of electric generation facilities pursuant to Utah Code Section 63G-3-301 and Subsection 53G-1-201(3)(c). The Commission requested public comments regarding the proposed Electric Interconnection Rule ("Rule").

The Utah Rural Electric Association provides the following comments for the proposed Rule:

Rule 746-312-2. Definitions.

(13) "Good utility practice" means a practice, method, policy, or action engaged in or accepted by a significant portion of the electric industry in a region during the relevant time period, which a reasonable utility official would expect, in light of the facts reasonably discernable at the time, to accomplish the desired result reliably, safely, economically, and expeditiously...

Note: In any economic climate, but especially in times of recession, public utilities, public service commissions and elected boards of directors must also ensure the economics of every ratepayer issue considered, in addition to the reliability and safety.

Rule 746-312-3. Purpose, Scope, Applicability and Exceptions.

(1) (a) All references to fees and charges in Rule 746-313 312-13 do not apply to public utilities for which the Commission does not have ratemaking authority...

Note: The reference to the Rule 746-312-13. Interconnection Fees and Charges needs to be corrected as shown above.

(1) (b) All references to required times, time lines, or deadlines in R746-312 do not apply to public utilities whose governing authority has, after appropriate notice and opportunity for public comment, adopted by rule alternative required times, timelines, or deadlines, provided the public utility files with the Commission the final rule and evidence of appropriate notice and opportunity for public comment.

Note: *Insert new Exception (b) after Exception (a) and move old Exception (b) to Exception (c).*

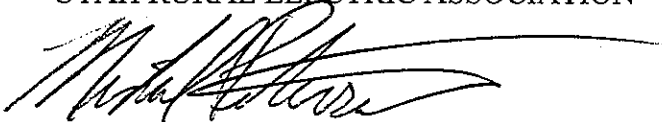
New Exception (b) is necessary for small public utilities, like rural electric cooperatives, which may have a single engineer on staff. At those utilities it is entirely likely that a request for interconnection could be submitted while that single engineer is out of the office for meetings or vacation for a week or two and the entire prescribed time required could have passed before the engineer even received any requests or applications or even have a chance to contract a consultant to review the particular case.

The Utah Rural Electric Association has also been provided with a copy of the comments being submitted by Rocky Mountain Power relevant to the interconnection docket. We concur with the suggestions put forth by Rocky Mountain Power.

Thank you for the opportunity to comment on the proposed rule.

Sincerely,

UTAH RURAL ELECTRIC ASSOCIATION



Michael Peterson
Executive Director