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September 30, 2009

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

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

Attention: Sandy Mooy  
Commission Administrator

Re: In the Matter of the Notice of Proposed New Rule 746-700, Standards for Interconnection of Electrical Generating Facilities to Public Jurisdiction Under the Public Service Commission, Docket 09-R312-01; DAR File No. 32881; State Admin. Rule Filing Key: 148759; Utah Admin. Code Ref. (R no): R746-312-

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”). Rocky Mountain Power (“RMP” or the “Company”) provides the following comments for the proposed Rule.

**General Comments:**

RMP generally supports the proposed Rule by the Commission. RMP is committed to work with the Commission and potential generators that desire to interconnect to the Company’s distribution system to develop a process that will work for all parties. In order to develop standardized agreements and forms, and implement the requirements and framework required by the proposed Rule, RMP requests a period of 90 calendar days after the Rule is approved to develop the documents and processes that would allow RMP to comply with the requirements outlined in the Rule.

**RMP submits the following specific comments:**

**Rule 746-312-2. Definitions.**

“Interconnection Facilities” is not currently a defined term. Rocky Mountain Power requests that the Commission include a definition of “Interconnection Facilities” as follows: “Interconnection Facilities” means the facilities and equipment required by a public utility to accommodate the interconnection of a small generator facility to the public utility’s electric distribution system and used exclusively for that interconnection. Interconnection Facilities do not include Upgrades or equipment that is the part of the Equipment package.

Rocky Mountain Power requests that “applications and/or forms” be added to the second sentence of subsection (18) “Interconnection request” so that the resulting sentence reads: “The interconnection request includes all required applications and/or forms, processing fees or deposits required by the public utility.” In order for RMP to review and approve the interconnection request, all required information must be received prior to the approval.

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

Section 746-312-3(5)(b)(ii) currently requires that if a dispute has not been resolved within 2 business days, the dispute shall be served upon the other party and filed with the Commission. Rocky Mountain Power submits that two (2) days is not a sufficient timeframe to resolve disputes without Commission intervention. A period of 30 days would be appropriate to allow the Company to review the dispute internally and work with the customer to resolve the dispute.

**Rule 746-312-4. Installation, Operation, Maintenance, Testing and Modification of Generating and Interconnection Facilities.**

Section 746-312-4(1) currently does not address what happens to existing facilities when an existing interconnection agreement expires. Rocky Mountain Power requests that the Commission add a sentence stating: “Prior to the expiration of an interconnection agreement in effect prior to the effective date of this rule, an interconnection customer of a public utility must submit an interconnection request to the public utility. The interconnection customer must continue to operate and maintain its generating and interconnection facilities in accordance with the IEEE standards, as applicable, and meet the requirements of the interconnection agreement or other agreements executed by the parties during the interconnection review and approval process.”

The Company also requests that the text of section 746-312-4(2)(i) be removed and replaced with:

- (i) For customer services of 600 volts or less, a public utility may not require a disconnect switch for a net metering facility that is inverter-based with a maximum rating as shown below.
  - (A) Service type: 240 Volts, Single-phase, 3 Wire — Maximum size 7.2 kW.
  - (B) Service type: 120/208 Volts, 3-Phase, 4 Wire — Maximum size 10.5 kW.
  - (C) Service type: 120/240 Volts, 3-Phase 4 Wire — Maximum size 12.5 kW.
  - (D) Service type: 277/480, 3-Phase, 4 Wire — Maximum size 25.0 kW.
  - (E) For other service types, the net metering facility must not impact the customer-generator’s service conductors by more than 30 amperes.

Rocky Mountain Power submits that the primary reason for having the disconnect switch is to avoid flashing that may occur when a meter is pulled. Flashing may occur anytime there is more than 30 amps flowing through the electric meter. Most residential customer take electric service at 240 volts. For example, if a residential customer taking electric service at 240 volts installed a 10 kW solar array without a disconnect switch and Rocky Mountain Power was called out by the fire department to disconnect electric service, flashing could occur if the meter was pulled above 7.2 kW of generation. Because of safety concerns, RMP respectfully request that the exception

to the required disconnect switch be stated in amps with a conversion for kW of each delivery voltage.

**Rule 746-312-4(2)(ii) Installation, Operation Maintenance, Testing and Modifications of Generating and Interconnection Facilities**

The Company would like this section deleted completed. RMP prefers all disconnects to be within 10 feet of the meter base.

**Rule 746-312-6. General Interconnection Request Provisions**

Rocky Mountain Power is concerned that Section 746-312-6(6) allows customers to submit an executed form prior to the project specifications being agreed upon between the customer and utility. Rocky Mountain Power respectfully requests that this provision be stricken from the final rule.

**Rule 746-312-8. Level 1 Interconnection Review**

Rocky Mountain Power requests that the Commission extend the 10 business day timeframe in Section 746-312-8(4) to 30 business days. Rocky Mountain Power does not stock meters for this application and will be unable to comply with a 10 day requirement.

**Rule 746-312-9. Level 2 Interconnection Review**

Rocky Mountain Power requests that the Commission change the references in 746-312-9(2)(e)(i)(A)(ii)(A) and 746-312-9(3)(a) from 20 business days to 30 calendar days for consistency. Rocky Mountain Power believes that payment terms are traditionally given in calendar days and 30 calendar days to pay an invoice or process a refund is an industry standard.

Rocky Mountain Power requests that the Commission change the references in 746-312-9(2) from 15 business days to 20 business days. Level 2 interconnection generation size go up to 2,000 kW and require greater review.

Finally, Rocky Mountain Power requests that “facilities modifications or” be deleted in the first sentence after “Offer to complete” in Rule 746-312-9(2)(e)(ii)(A). Rocky Mountain Power believes it is appropriate to limit this section to require utilities to perform only minor modifications under a Level 2 Interconnection review.

**Rule 746-312-10. Level 3 Interconnection Review**

Rocky Mountain Power is concerned that section 746-312-10(2)(e)(iii)(B) allows the review process to move directly from the feasibility study to the facilities study if the feasibility shows no potential for adverse system impacts but requires additional facilities. There are studies done in a system impact study that are not performed in a feasibility study that must be completed before Rocky Mountain Power can proceed.

Rocky Mountain Power also requests that the Commission identify how a utility can receive approval from the Commission for additional elements, as specified in section 746-312-10(f)(i)(E)(VII).

Further, Rocky Mountain Power requests that the Commission clarify section 746-312-10(f)(iii), which references transmission impact studies that appear to be outside the scope of this rule. If the Commission intended to reference distribution impact studies, this section should be changed to reflect that intent.

**Rule 746-312-12. Interconnection Monitoring**

The proposed rule, which allows the utility to require telemetry for generating facilities greater than 5 MW in certain circumstances (section 746-312-12(2)), and allows the utility to petition the commission to impose requirements for facilities between 3 and 5 MW (section 746-312-12(3)), do not match Rocky Mountain Power's internal standards, which require monitoring and telemetry for all generating facility interconnections greater than 3 MW. Accordingly, Rocky Mountain Power requests that the Commission modify the proposed rule to allow the utility to require monitoring and telemetry for generating facilities greater than 3 MW.

**Rule 746-312-13. Interconnection Fees and Charges**

Rocky Mountain Power is concerned that preventing public utilities from charging an application fee for Level 1 interconnection reviews will impose an undue burden on the utility's customers that are not participating in the net metering program. Accordingly, Rocky Mountain Power requests that it be allowed to impose a reasonable fee or charge for review of a Level 1 interconnection application.

**Rule 746-312-16. Public Utility Maps, Records and Reports**

Rocky Mountain Power requests that "and the county and zip code" be removed from section 746-312-16(2)(a). Rocky Mountain Power's reporting systems vary and do not classify customers by county or zip code, and to do so would be administratively burdensome and would require additional expense to be incurred by the public utility to track the interconnection customer generating facilities.

**Rule 746-312-17. Interconnection-related Agreements**

Rocky Mountain Power requests that the Commission modify Section 746-312-17(1)(e) to either require interconnection customers whose generating facilities are smaller than 2 MW to obtain prudent amounts of general liability insurance, or add a provision absolving the utility of the risk associated with interconnecting with such facilities.

Very Truly Yours,

Jeffrey K. Larsen  
Vice President, Regulation  
Rocky Mountain Power