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## MEMORANDUM

To: Utah Public Service Commission

From: Division of Public Utilities  
Philip J. Powlick, Director  
Energy Section  
Artie Powell, Manager  
Jamie Dalton, Utility Analyst

Date: October 1, 2009

Subject: In the Matter of the Notice of Proposed New Rule 746-312-, Standards for Electrical Interconnection of Generating Facilities, Docket No. 09-R312-01; DAR File No. 32881.

### ISSUE:

On September 1, 2009, the Utah Public Service Commission (“Commission”) requested comments on DAR File No. 32881, providing notice of proposed rule changes regarding interconnection of electrical generation facilities pursuant to Utah code Section 63G-3-301, and Subsection 53C-1-201(3)(c). These rules implement standards for interconnection of electric generation facilities to public utilities under Commission jurisdiction. The rules also specify application procedures, technical requirements, evaluation, inspection/maintenance requirements, fees, and timelines pertaining to interconnection of facilities to public utilities.

### COMMENTS:

The Division participated in the development of rules under this Docket and provided initial comments in related conferences and meetings. Based on this previous input, the Division provides the following comments.

### **Disconnect Switch Exemptions**

Rule 746-312-3 (1) (b) provides a disconnect switch requirement and associated exemptions for public utilities:

...a public utility whose governing authority has, after appropriate notice and opportunity for public comment, adopted by rule additional reasonable safety requirements, power quality and interconnection requirements is exempt from the disconnect switch exemption in Subsection R746-312-4(2)(a)(i) provided the public utility files with the Commission the final rule and evidence of appropriate notice and opportunity for public comment.

The Division is concerned that the exemption is too broad ranging, particularly for level-one interconnections. It recommends that the Commission consider revising this provision such that it applies to inverters installed before the effective date of this rule for level-one interconnections. The Division believes that new inverters, particularly on level-one installations, come equipped with automatic disconnect switches that meet the IEEE and other safety requirement standards listed in Title 54 and effectively protect against potential safety hazards.

### **Rule 746-312-15, Aggregation of Meters for Net Metering Interconnection**

Under subsection (7), the rule states that the public utility may charge the interconnection customer a “reasonable fee” that “covers the administrative costs of this provision.” The Division has concerns over what a “reasonable fee” is and recommends that an explicit not to exceed limit be considered to make this portion of the rule less vague.

cc: Michele Beck, Utah Office of Consumer Services