

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

From: Salt Lake County Mayor Corroon

Re: In the Matter of the Proposed New Rule 746-700, Standards for
Interconnection of Electrical Generating Facilities to Public Jurisdiction
Under the Public Service Commission

Dear Commissioners:

First, I wanted to take a moment to thank you for your work on removing barriers both in this proposed rule and through the net metering process. Your work and dedication is allowing groups like Salt Lake County to make better energy decisions.

The proposed rule takes several much needed steps to moving the state's Interconnection process forward. Thank you for changing the size limits for each level of review to better correspond with Utah's new net metering size limits and larger systems up to 20 MW. I also appreciate the quick dispute resolution procedure included in the rule, the allowance for Aggregation of Meters, and for the proposed insurance requirement exemption for systems under 2 MW.

As you know, Salt Lake County Government is dedicated to diversifying the energy portfolio of the Salt Lake Valley, both internally for our government infrastructure and externally for our constituents. Given the profound impacts of air pollution, energy cost and supply problems on the well-being of the citizens of Salt Lake County, we are supportive of those decisions that provide economic benefits without compromising the quality of the environment, both locally and regionally. Since our last testimony on net metering, the County has increased our number of solar arrays and diversified our types of onsite renewable energy systems to include Geothermal. We have also, with the assistance of the U.S. Department of Energy, completed two studies on solar applications for the County, one focused on County government installations, the second focused on residential solar applications.

Specific to the Matter of the Proposed New Rule 746-700, Standards for Interconnection of Electrical Generating Facilities to Public Jurisdiction Under the Public Service Commission, the County has discovered additional barriers that may be addressed with some additional modifications to this rule. It is my understanding that the proposed rule is intended to address some of these issues. Please accept the following issues for consideration:

- Add another Interconnection Review Level (Level 4) specifically for large, non-exporting distributed generation systems – this level will reflect the different nature and impacts of non-exporting energy systems, help streamline the interconnection process and minimize the cost and time for studies and review.
- Include a requirement that the public utility provide the customer with a maximum limit on study costs for Levels 2 and 3 to protect the customer from unanticipated high study costs.
- For Level 1, I encourage you to consider changing the time frame for the utility to send notification to the interconnection customer as to whether the interconnection request is complete from 10 business days to 5 business days; this change would help speed the review process for smaller systems.
- Lastly, we support the stated provisions for the disconnect switch procedures and would encourage you to extend the exemption for the disconnect switch requirement to all inverter-based Level 1 interconnection systems (up to 25 kW); it is my understanding that the disconnect switch is an unnecessary, additional cost for certain systems.

We look forward to working with you on this process as we continue our efforts to diversify the Valley's energy portfolio.

Regards,

Peter M. Corroon
Mayor, Salt Lake County