



201 South Main, Suite 2300
Salt Lake City, Utah 84111

February 1, 2010

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th 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”). On September 30, 2009, Rocky Mountain Power provided comments and proposed edits to the Commission on the proposed rule changes. The proposed Rule, incorporating a number of those edits, was published in the January 1, 2010, issue of the Utah State Bulletin. Rocky Mountain Power (“RMP” or the “Company”) provides the following comments on the proposed Rule as it now stands.

General Comments:

As indicated in our initial comments, RMP generally supports the proposed Rule by the Commission and appreciates that the Commission has incorporated several of the Company’s suggestions in this version of the Rule. In our comments herein, RMP requests that the Commission again consider the following proposed edits that are necessary to ensure a rule that is effective and workable for the Commission, RMP, and potential generators that desire to interconnect to the Company’s distribution system.

RMP submits the following specific comments:

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

Section 746-312-3(5)(b)(ii), as revised, requires that if a dispute has not been resolved within seven (7) business days, the dispute shall be served upon the other party and filed with the Commission. Rocky Mountain Power acknowledges and appreciates the increase from two (2) to seven (7) business days. This is an improvement over the previous draft, but RMP submits

that seven (7) days is still not a sufficient timeframe to resolve disputes without Commission intervention. A period of 30 calendar days would be more 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.

The Company again 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 customers 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 requests that the exception to the required disconnect switch be stated in amps with a conversion for kW of each delivery voltage.

Rule 746-312-10. Level 3 Interconnection Review

Rocky Mountain Power again 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 and outside the jurisdiction of the Commission. If the Commission intended to reference distribution impact studies, this section should be changed to reflect that intent.

Rule 746-312-12. Interconnection Monitoring

This section, 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)), does 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.

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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