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# State of Utah

## Department of Commerce

### Division of Public Utilities

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To: Utah Public Service Commission  
From: Division of Public Utilities  
Philip Powlick, Director  
Artie Powell, Manager, Energy Section  
Thomas Brill, Technical Consultant  
Subject: Review of Interconnection Forms, Docket No. 09-R312-01.  
Date: April 8, 2010

#### **ISSUE**

On February 1, 2010, Rocky Mountain Power (Company) filed standard form agreements for electrical interconnection. These standard form agreements were intended to comply with the draft Electrical Interconnection rule, R746-312. The draft rule will be made effective on April 30, 2010.

#### **BACKGROUND AND DISCUSSION**

The Division of Public Utilities (Division) reviewed five standard form agreements:

- 1) Interconnection and Net Metering Service Agreement for Net Metering Facility Level 1 Interconnection 25 KW Nameplate Capacity or Smaller;
- 2) Interconnection and Net Metering Service Agreement for Net Metering Facility Level 2 Interconnection up to 2 MW Nameplate Capacity;
- 3) Interconnection and Net Metering Service Agreement for Net Metering Facility Level 3 Interconnection up to 20 MW Nameplate Capacity;
- 4) Impact Study Agreement Level 3 Net Metering Interconnection Review;

5) Interconnection Facilities Study Agreement Level 3 Net Metering Interconnection Review.

Each standard agreement form was examined for compliance with the draft Electrical Interconnection rule, R746-312, as well as internal consistency and consistency with the other forms. In addition, each standard agreement form was compared to a previous Company interconnection agreement form, as well as to the relevant FERC interconnection application, procedures, and terms and conditions.

These five interconnection standard agreement forms concern net metering interconnection and are specific to the Company's Schedule 135 tariff. The Division contacted the Company regarding net metering vs. non-net metering interconnection, since non-net metering interconnection is not addressed in these five agreement forms. The Division understands that the Company will be submitting over the next few weeks additional forms that cover non-net metering interconnection agreement forms.

## **ANALYSIS**

The Division has noted inconsistencies in style and editing between the five forms. The Division suggests correcting the forms for consistency. Examples of suggested consistency improvements include items as capitalization, correcting typographical errors, removing extra spaces, consistent hyphenation, consistent use of commas in lists and section headings, and consistent margins, indentation, and formatting. In addition, the applications that are included with each standard agreement form should be consistent in style and format and, as much as possible, have a similar appearance. In each application form, each section should explicitly declare who is to fill out the requested information. Most, if not all, of these corrections are addressed with the recommendation for an overall edit and consistency review across all five agreement forms.

A few changes rise to the level of necessity, as opposed to stylistic or consistency recommendations. Specifically, in the service agreement for Level 3 Interconnection up to 20 MW, necessary corrections in section 1.1 should include definition (23), as well as changing "2 MW" to "20 MW." "Oregon" in the footer should be removed throughout the document. Section 1.11.4 should be changed to "3 years," which is consistent with R746-

312-14(4). Section 2.1 should have “10 business days after notice” to be consistent with R746-312-8(4). Section 3.3.2 refers to 5.7, which is an incorrect reference. Section 5.4.3 refers to 5.7.2, which is an incorrect reference. Article 6 should read “in compliance with the Rule and the safety standards contained in the Rule.” Article 6, regarding insurance, should also be reconciled with R746-312-17(1)(e)(ii). Article 7 should be “relevant provisions of the Rule and the applicable state law.”

In the service agreement form for Level 2 Interconnection up to 2 MW, section 3.3.2 refers to 5.6, which is an incorrect reference. Section 6.4.3 refers to 6.7.2, which is also an incorrect reference. Section 4.1, concerning an application fee, should be corrected with the appropriate reference to the rule since Schedule 135 does not have an application fee. Article 7 should read “with the Rule and the safety standards contained in the Rule.” Article 8 should be “relevant provisions of the rule and applicable state law.”

In the service agreement form for Level 1 Interconnection up to 25 KW, section 1.7 should include mention of a public utility inspection within 10 days to be consistent with R746-312-8(4). Article 7 refers to an Oregon code or rule, which should be changed to the appropriate Utah reference. In addition, 8.1 should be modified and read “applicable state law or rule.”

## **CONCLUSIONS AND RECOMMENDATIONS**

In general, the Division recommends an overall edit and consistency review across all five interconnection agreement forms, followed by resubmitting all five forms.

The Division also recommends the inclusion of an electronic mail option with physical mail or delivery for any written notice, demand, or request. The Division also suggests including a webpage link after the first mention of R746-312 in each standard agreement form.

In conclusion, subject to correcting minor errors and reviewing the forms for stylistic consistency, the Division finds the standard agreement forms to be generally in compliance with the draft Electrical Interconnection rule, R746-312.

Cc Dave Taylor, Rocky Mountain Power  
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