

May 1, 2023

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

**RE: Docket No. 23-999-09**

Proposed Rulemaking Regarding Utah Code Title 54, Chapter 25, Electrical Power  
Delivery Quality Act  
*Rocky Mountain Power Comments*

On March 17, 2023, the Public Service Commission of Utah (the “Commission”) issued a notice in the above referenced docket establishing comment and reply comment deadlines (“Notice”). The Commission is required to consult with qualified utilities, utility-scale electricity providers and other state agencies to create rules pursuant to H.B. 389, Electrical Power Delivery Quality Amendments (“HB 389”), which was passed by the Utah Legislature during the 2023 Utah General Session. In the Notice, the Commission requested comments from interested parties to promulgate rules:

- (1) Establishing the submission of an electrical power delivery quality plan;
- (2) Establishing procedures for the review of an electrical power delivery quality plan;
- (3) Establishing the procedures for the review of the implementation of an electrical power delivery quality plan; and
- (4) Any other rules that the PSC determines are necessary to protect the public interest and to implement Utah Code Title 54, Chapter 25.

In accordance with the Notice, Rocky Mountain Power (“RMP” or the “Company”) submits its comments.

**General Comments**

HB 389, which enacts Utah Code 54-25-101 et seq., requires that a qualified utility as defined in Section 54-17-801 prepare an Electrical Power Delivery Quality Plan with respect to interconnected utility-scale generation facilities, which includes facilities that have a generation capacity of more than two megawatts (“MW”) and is intermittent, non-dispatchable, or controlled by an inverter. Under Section 54-25-201, an Electrical Power Delivery Quality Plan must describe (1) the procedures and standards that the qualifies utility will use to assess an interconnection request under certain circumstances; (2) the equipment that it will use to perform such an assessment; and (3) the proposed modifications or upgrades to facilities and preventative

programs that the qualified utility will implement to address any electrical power delivery issues that do not meet the utility's interconnection policy or national standards.

The Commission initiated this rulemaking as required under Utah Code 54-25-102. Specifically, the Commission has been directed to promulgate rules in four categories described above. Below RMP offers its comments and recommendations for each category. RMP's suggestions are intended to meet the requirements set forth in Utah Code 54-25-201 but also to streamline the review process, and ease administrative burden for the Commission, utilities, and stakeholders.

### **Submission of an Electrical Power Delivery Quality Plan**

The Company suggests that the Commission require a qualified utility as defined by Utah Code 54-17-801 to prepare an Electrical Power Delivery Quality Plan in accordance with the requirements of Utah Code 54-25-201 and submit the plan to the Commission every other year beginning on a date selected by the Commission. The Company suggests the following potential Rule language:

- A qualified utility shall submit an Electric Power Delivery Quality Plan that includes the items required by Subsection 54-25-201(2) to the Commission for approval on [to be determined date] and then [to be determined date] of every other year thereafter.

### **Review of an Electrical Power Delivery Quality Plan**

The Company recommends that the Commission establish rules that specify the following comment schedule:

- The Commission shall provide a public notice of a qualified utility's filing of its Electric Power Delivery Quality Plan.
- Within 30 days following such public notice, interested parties may file comments on the qualified utility's Electric Power Delivery Quality Plan
- The qualified utility will have 21 days to respond.
- Within 120 days of a qualified utility's submittal of its Electric Power Delivery Quality Plan, unless the Commission determines that another process or additional time is warranted and is in the public interest, the Commission will issue an order regarding the qualified utility's Electric Power Delivery Quality Plan that includes its findings under 54-25-201(3).

### **Review of the Implementation of an Electrical Power Delivery Quality Plan**

The Company recommends that the Commission establish rules that specify the following comment schedule:

- Later than [to be determined date] and each year after 2024, a qualified utility shall submit an Electrical Power Delivery Quality Plan Implementation Status report.

- Detailing the qualified utility's compliance with the qualified utilities approved Electrical Power Delivery Quality Plan.
- The Commission shall provide a public notice of a qualified utility's filing of its Electric Power Delivery Quality Plan Implementation Status report.
- Within 30 days following such public notice, interested parties may file comments on the qualified utility's Electric Power Delivery Quality Plan Implementation Status report
- The qualified utility will have 21 days to respond.
- Within 90 days of a qualified utility's submittal of its Electric Power Delivery Quality Plan Implementation Status report, unless the Commission determines that another process or additional time is warranted and is in the public interest, the Commission will issue an order regarding the qualified utility's Electric Power Delivery Quality Plan Implementation Status report.

### **Other Rules to Protect the Public Interest**

The Company is required to comply with a multitude of performance standards related to power quality and reliability, including applicable standards promulgated by the North American Electric Reliability Corporation ("NERC"), the American National Standards Institute ("ANSI"), the Institute of Electrical and Electronics Engineers ("IEEE"), and others. The Company recommends that reliability or power quality measures or standards adopted by the Commission refer to these otherwise applicable standards to ensure that the Commission's standards are consistent with those that are already applicable to the Company's operations. Conflicting standards could create confusion and compliance difficulties. The Company recommends the rulemaking address and further define power quality as covering areas of voltage level, range, balance, harmonic distortion, flicker, disturbances, and frequency. Rocky Mountain Power's power quality standards, which reference and adhere to national standards, can be found at <https://www.rockymountainpower.net/about/power-quality-standards.html>. "

RMP appreciates the opportunity to participate in this rulemaking and looks forward to working with the Commission and other stakeholders. Questions about this filing can be addressed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward

Senior Vice President, Regulation and Customer/Community Solution

**CERTIFICATE OF SERVICE**

Docket No. 23-999-09

I hereby certify that on May 1, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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**Division of Public Utilities**

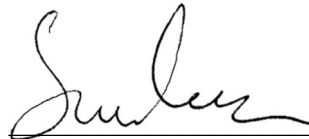
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