

March 1, 2017

## VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

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. 14-035-114

**Update on Processing Net Metering Interconnection Reviews Subject to Waiver and Request to Withdraw Motion for Temporary Emergency Waiver** 

PacifiCorp d/b/a Rocky Mountain Power ("the Company") submits this update on the status of processing net metering applications that were subject to the temporary waiver of the timeframes in the administrative rules, authorized by the Public Service Commission of Utah's Order Granting Waiver on December 14, 2016, in the above-referenced proceeding, and requests to withdraw its Motion for Emergency Waiver for the reasons set forth below.

### **Background**

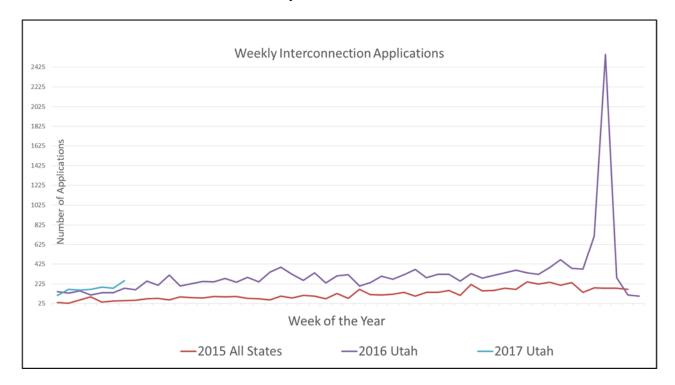
On December 13, 2016, the Company submitted a Motion for Emergency Waiver of Levels 1, 2, and 3 Interconnection Review Processing Timeframes in order to temporarily relieve the Company of its obligation to comply with timeframes required by R746-312-8 through R746-312-10. On December 14, 2016, the Commission issued an Order Granting Waiver, which also directed the Company to file a proposed plan for processing the backlog of applications.

On December 27, 2016, the Company submitted the required compliance filing to the Order Granting Waiver that included a status update on processing pending applications and proposed extended temporary timeframes for certain rule requirements related to processing Level 1 applications. The Company noted it would resume processing Level 2 and Level 3 applications in accordance with the administrative rules. The Company also committed to file a report on or by March 1, 2017, to provide a status update on the backlog and number of new Applications received during this time. At that time the Company would make any further recommendations on the administrative rule timeframes and waiver.

On January 5, 2017, the Commission issued a Notice of Filing and Comment Period for any party to submit comments regarding the December 27, 2017, compliance filing and proposal for timelines. On January 27, 2017, Utah Clean Energy filed comments supporting the Company's proposed temporary timeframes.

### **Update on Backlog of Applications and Recommendations**

The Company has now completed processing all applications in the backlog and is processing new applications in the timeframe required by the administrative rules. For reference, the graph below shows the number of weekly interconnection applications received by the Company in 2015 for all states, and 2016 and 2017 (year to date) in Utah alone. Notably, while the number of applications received has diminished considerably since the spike at the end of 2016, the number in 2017 exceeds the level at this time last year.



Finally, the Company finds that the temporary waiver for the administrative rules is no longer necessary at this time and requests to withdraw its Motion for Emergency Waiver of Levels 1, 2, and 3 Interconnection Review Processing Timeframes. However, the Company notes that certain timeframes in the administrative rules may be implicated later in 2017 by the large number of applications received by the Company after November 10, 2016, which is represented by the large spike in the graph above. Specifically, R746-312-8(4) requires the company to conduct any inspection or tests, set the meter, and issue final approval for parallel operation within 10 business days after receipt of all required documentation. If there are a significant number of inspections required in the same timeframe in the future after the installations are completed for the applications representing the spike in the graph, then the Company may need to seek a temporary waiver again if the workload exceeds available resources.

Informal inquires may be directed to Bob Lively at (801) 220-4052.

Sincerely,

Jeffrey K. Larsen

Vice President, Regulation

#### CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> of March 2017, a true and correct copy of the foregoing document was served by email on the following Parties in Docket No. 14-035-114:

#### **Division of Public Utilities**

Chris Parker - <u>ChrisParker@utah.gov</u> William Powell - <u>wpowell@utah.gov</u> Erika Tedder - etedder@utah.gov

### **Utah Office of Consumer Services**

Michele Beck - <a href="mbeck@utah.gov">mbeck@utah.gov</a> Cheryl Murray - <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a> Bela Vastag - <a href="mailto:bvastag@utah.gov">bvastag@utah.gov</a>

## **Assistant Utah Attorney General**

Patricia Schmid - <u>pschmid@utah.gov</u>
Justin Jetter - <u>jjetter@utah.gov</u>
Robert Moore - <u>rmoore@utah.gov</u>

### **Summit County**

David L. Thomas - dthomas@summitcounty.org

#### **Western Resource Advocates**

Jennifer Gardner - <u>jennifer.gardner@westernresources.org</u> Nancy Kelly - <u>nkelly@westernresources.org</u> Penny Anderson - <u>penny.anderson@westernresources.org</u>

### **Energy Freedom Coalition of America**

Bruce M. Plenk - <u>solarlawyeraz@gmail.com</u>
Thadeus B. Culley - <u>tculley@kfwlaw.com</u>
James M. Van Nostrand - <u>jvannostrand@kfwlaw.com</u>

### **HEAL Utah**

Michael Shea - michael@healutah.org

### Auric Solar, LLC

Elias Bishop - Elias.bishop@auricsolar.com

## **Salt Lake County**

Donald H. Hansen - <u>dhansen@slco.org</u> Jennifer Bailey - <u>jenbailey@slco.org</u>

### Sunrun, Inc.

Bruce M. Plenk - <u>solarlawyeraz@gmail.com</u> Thadeus B. Culley - <u>tculley@kfwlaw.com</u> James M. Van Nostrand - jvannostrand@kfwlaw.com

## **Park City Municipal Corporation**

Luke Cartin - <u>Luke.Cartin@parkcity.org</u>

Thomas A. Daley - tdaley@parkcity.org

### **Vote Solar**

Rick Gilliam - rick@votesolar.org

## Legend Ventures, LLC (dba Legend Solar, LLC)

Nathan K. Fisher - nathanf@fisherhunterlaw.com

### Intermountain Wind and Solar, LLC

Brian W. Burnett. Esq. - bburnett@kmclaw.com

Dale Crawford - dale@imwindandsolar.com

 $Doug\ Shipley\ \hbox{-}\ \underline{doug@imwindandsolar.com}$ 

Mark Allred - mark@imwindandsolar.com

Mark Richards - <u>markrichards@imwindandsolar.com</u>

 $Doug~Vause - \underline{dougvause@imwindandsolar.com}\\$ 

### **Vivant Solar**

Stephen F. Mecham - sfmecham@cnmlaw.com

## **Utah Solar Energy Association**

Elias Bishop - ebishop@utsolar.org

Chad Hofheins - chad@synergypowerpv.com

### **Interstate Renewable Energy Council, Inc.**

Sara Baldwin Auck - sarab@irecusa.org

## **UCARE**

Michael D. Rossetti - mike\_rossetti@ucare.us.org

Stanley T. Holmes - stholmes3@xmission.com

### **Utah Association of Energy Users**

Gary A. Dodge - gdodge@hjdlaw.com

Kevin Higgins - khiggins@energystrat.com

Neal Townsend - <a href="mailto:ntownsend@energystrat.com">ntownsend@energystrat.com</a>

## The Alliance for Solar Choice

Bruce M. Plenk - solarlawyeraz@gmail.com

Thadeus B. Culley - tculley@kfwlaw.com

### **Salt Lake City Corporation**

Tyler Poulson - tyler.poulson@slcgov.com

# Sierra Club

Casey Roberts - casey.roberts@sierraclub.org
Travis Ritchie - travis.ritchie@sierraclub.org
Derek Nelson - derek.nelson@sierraclub.org

# **Utah Clean Energy**

Sophie Hayes - sophie@utahcleanenergy.org
Sarah Wright - sarah@utahcleanenergy.org
Kate Bowman - kate@utahcleanenergy.org

ennifer Angell

Supervisor, Regulatory Operations