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March 2, 2018

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 14-035-114 – In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

See attached the Company's Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes in the above referenced docket.


Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Sincerely,


Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 14-035-114

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Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program	Docket No. 14-035-114
	MOTION FOR EMERGENCY WAIVER OF LEVEL 3 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES

Pursuant to Utah Admin. Code R746-312-3(2) and R746-1-109, Rocky Mountain Power, a division of PacifiCorp (“Company” or “Rocky Mountain Power”), hereby requests and moves the Commission for an expedited order temporarily relieving the Company from meeting the timeframes required by R746-312-10 (2)(f)(iii) to complete and provide a System Impact Study (“SIS”) for Level 3 Interconnection Review applications (the “Applications”). In support of its request, the Company states as follows.

BACKGROUND

On November 28, 2017 the Company filed an Emergency Waiver of Levels 1 and 2 Interconnection Review Processing Timeframes under applicable rules in this docket requesting an extension of the timeframes to process the large volume of applications received from November 1 through 14, 2017 due to the November 15, 2017 sunset of the net metering program under tariff Schedule 135. At the time, the Company did not request a waiver of Level 3 interconnection rules because it was not far enough along in the process of reviewing Level 3

interconnection applications to know that it would also need a waiver of those interconnection application timeframes. However, the Company did recognize the possibility “that certain timeframes in the administrative rules may be implicated in 2018 by the large number of Applications received by the Company from November 1 through 14, 2017.”¹ At the time the Company noted that it “may need to seek a temporary waiver again if the workload exceeds available resources.”² The Company reiterated the possibility in its compliance filing in this matter January 26, 2018.

LEVEL 3 INTERCONNECTION REVIEW

Under R746-312-10, a generating facility is considered a Level 3 facility if a) the generating facility has a capacity of greater than 2 megawatts, but less than 20 megawatts; b) is not certified (designed using UL-certified equipment – subject to certain testing standards); or 3) failed Levels 1 and 2 interconnection review requirements. Due to size and scope, Level 3 interconnections are more complex than Levels 1 and 2 interconnections and require a more extensive review. For example, Level 3 interconnections require the Company to perform a SIS which must be completed and provided to the customer within thirty business days under Utah Admin. Code R746-312-10 (2)(f)(iii). SIS are complicated and, by their very nature, increase in number when the pending studies involve the same substation and/or circuit. Overlapping substations and/or circuits severely limit the Company’s ability to review the studies concurrently.

REQUEST FOR TEMPORARY WAIVER

Many of the Level 2 applications received before the November 15, 2017 deadline transitioned to Level 3 applications by failing Level 2 interconnection review requirements. To illustrate the unique situation warranting the Company’s request, Rocky Mountain Power

¹ See Rocky Mountain Power’s Motion for Emergency Waiver of Levels 1 and 2 Interconnection Review Processing Timeframes, November 28, 2017.

² *Id.*

received a total of 11 Level 3 applications from January 2016 through October 2017—a 22-month period. The Company has received a total of 20 Level 3 applications from November 2017 through January 2018 alone, all requiring an independent SIS. In addition, the average engineering time spent for each SIS is approximately 80 hours. Processing the 20 SIS currently pending will require approximately 1,600 engineering hours. The quality of the reviews are critical to ensure accurate and thorough reviews to assess the safety, system, and financial impacts of the proposed system.

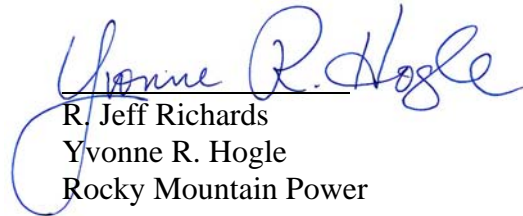
Thus to alleviate the strain on the Company's resources, the Company respectfully requests a waiver of R746-312-10 (2)(f)(iii) through the duration of the transition program enrollment in order to implement a modified review process. Specifically, the Company requests that the process be temporarily modified through the duration of the transition program enrollment in a queue format. The Company proposes to assign a NMQ# (queue position) on a first-come, first-serve basis that would be assigned once completed documentation and associated payment/deposit are received. The timeframes to process the applications would not begin until the documentation is completed and the associated payment/deposit are received. The Company will use best efforts to process the applications within 30 days beginning on the completion of the documentation and the receipt of the payment/deposit, whenever possible. In situations when there are multiple applications on the same distribution feeder, or in areas where projects may impact multiple feeders that have earlier requests, projects will be reviewed in the order received as expeditiously as possible. This staged review is required because the outcome of one study directly impacts the assumptions and feeder characteristics that will determine the results of the next study. Further, the Company recommends working with interested parties to more fully develop a new queue system for Level 3 interconnection review processes that could be incorporated into modifications to the rule.

WHEREFORE, the Company respectfully requests the Commission issue an order suspending the Company's obligation to comply with the specific processing timeframes for Level 3 interconnection applications under Utah Admin. Code R746-312-10 (2)(f)(iii), as set forth above and for the foregoing reasons.

RESPECTFULLY SUBMITTED this March 2, 2018.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER,



R. Jeff Richards
Yvonne R. Hogle
Rocky Mountain Power

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2018, a true and correct copy of Rocky Mountain Power's **MOTION FOR EMERGENCY WAIVER OF LEVEL 3 INTERCONNECTION REVIEW PROCESSING TIMEFRAMES** in Docket No. 14-035-114 was served by email on the following Parties:

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