

March 21, 2019

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
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 - In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program  
**Final Compliance Report on the Status of the Affected Applications**

PacifiCorp d/b/a Rocky Mountain Power ("the Company") submits this update on the status of processing Level 3 interconnection applications, for which temporary extensions of the required timeframes were authorized in the Commission's Order Granting Waiver in Part, issued March 21, 2018, in this proceeding.

**Background**

On March 2, 2018, the Company filed a Motion for Emergency Waiver of Level 3 Interconnection Review Processing Timeframes ("Motion") requesting an expedited order temporarily relieving the Company of the timelines required by R746-312-10 (2)(f)(iii) ("Timelines") to complete and provide a System Impact Study ("SIS") for Level 3 Interconnection applications. On March 21, 2018, the Commission issued an Order Granting Waiver in Part ("Order"), which granted a waiver of the Timelines and provided an additional 30 business days for processing. The Order also required the Company to submit quarterly status reports during the duration of the six month waiver period, which expired September 21, 2018.

On August 10, 2018, the Company filed a Motion for Temporary Waiver of Level 3 Interconnection Review Processing Timeframes ("Second Request"), requesting an extension of the waiver for an additional six months to continue to evaluate if a 60 day processing timeframe for Level 3 SIS is adequate to alleviate the concerns described by the Company in its Second Request. The Commission issued an Order Granting Waiver on September 13, 2018, approving the Company's request, which also continued the requirement for quarterly status reports for the applications affected by the waiver ("Affected Applications"). The purpose of this compliance filing is to provide the fourth and final quarterly update on the status of the Affected Applications as directed by the Commission. Since this is the end of the extension, the Company also presents its recommendations going forward.

**Report on Status of Affected Applications**

The Company had a total of 22 Affected Applications. Of those 22 applications, 13 are complete and nine cancelled at the customers' request. There are no remaining Affected Applications that have not been resolved. The table below provides additional detail for each application.

<b>Project*</b>	<b>System Size</b>	<b>Anticipated SIS Kick Off Date</b>	<b>Actual SIS Kick Off Date</b>	<b>SIS Anticipated Due Date</b>	<b>Request Status</b>
1	1.287 MW	2/23/2018	2/23/2018	4/6/2018	Complete
2	758.9 KW	2/23/2018	2/23/2018	4/6/2018	Complete
3	140 KW	2/23/2018	2/23/2018	4/6/2018	Complete
4	1.2 MW	3/29/2018	5/16/2018	6/27/2018	Complete
5	1.8 MW	3/29/2018	5/16/2018	6/27/2018	Complete
6	57.12 KW	5/30/2018	5/30/2018	7/12/2018	Complete
7	71.4 KW	5/30/2018	5/30/2018	7/12/2018	Complete
8	1.8 MW	6/20/2018	6/20/2018	8/2/2018	Complete
9	1.2 MW	6/20/2018	6/20/2018	8/2/2018	Complete
10	1.2 MW	6/27/2018	9/21/2018	12/28/2018	Complete
11	1.2 MW	6/27/2018	9/21/2018	12/28/2018	Complete
12	1.2 MW	7/11/2018	9/21/2018	11/2/2018	Complete
13	85.68 KW	7/11/2018			Complete
14	99.96 KW	7/18/2018			Cancelled
15	114.24 KW	7/18/2018			Cancelled
16	85.68 KW				Cancelled
17	1.9 MW				Cancelled
18	1.8 MW				Cancelled
19	1.9 MW				Cancelled
20	510.3 KW				Cancelled
21	134.60 KW				Cancelled
22	326.54 KW				Cancelled

\*Project names have been removed to protect customer privacy.

**Recommendation**

At the time of filing for the Motion and the Second Request, the Company had two main concerns regarding Level 3 interconnection reviews. First, the November 15, 2017 deadline in Docket No. 14-035-114 caused an intake of an unusually large volume of applications from November 1 through November 14. To alleviate this temporary problem, the Commission granted a 30-day extension of the Timelines, for a total of 60 days to process SIS. As shown in the table above, the Affected Applications have been processed and the number of Level 3 applications has returned to a manageable level.

Second, due to size and scope, Level 3 interconnections are more complex and require more extensive review, which is a permanent issue. As an increasing number of Level 3 customer systems connect to the Company's system, the review of the Level 3 applications becomes increasingly complex. To address these concerns, the Company recommended working with interested parties to develop a possible queue format system for Level 3 interconnection review that could be incorporated into modifications to the rule. Through discussions with the interested parties, the Company determined that, instead of a queue format system, lengthening the Required Timeframes permanently could be enough to alleviate the concerns surrounding Level 3 interconnections. In its Second Request, the Company asked the Commission to grant an additional six-month extension of the Timelines so the Company could continue to study the impact of the longer timeline. The Company noted that at the end of the extension it may determine that, once the bottleneck from the November 15, 2017 deadline was fully processed, 30 days would be adequate once again. Indeed, as the Affected Applications were all processed by the end of 2018, the Level 3 interconnection requests have returned to typical levels and new applications have been processed under the normal Timelines. Although SIS associated with Level 3 interconnections are increasing in complexity with higher penetration levels, the existing timeframes under R746-312-10 (2)(f)(iii) are adequate given the reduced number of applications. The Company recommends no changes to the administrative rules at this time and appreciates the Commission's and interested parties' assistance in this matter.

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward  
Vice President, Regulation

## CERTIFICATE OF SERVICE

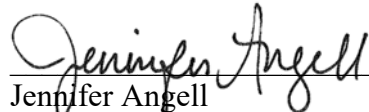
I hereby certify that on March 21, 2019, a true and correct copy of Rocky Mountain Power's **FINAL COMPLIANCE REPORT ON THE STATUS OF THE AFFECTED APPLICATIONS** in Docket No. 14-035-114 was served by email on the following:

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