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September 29, 2017

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Attention: Gary Widerburg
Commission Secretary

Re: In the Matter of the Application of Rocky Mountain Power to Implement
Programs Authorized by the Sustainable Transportation and Energy
Docket No 16-035-36

Pursuant to the Notice of Filing and Comment Period in the above referenced matter dated August 18, 2017, PacifiCorp (dba Rocky Mountain Power) submits for electronic filing its reply comments on the September 15, 2017 comments of the Division of Public Utilities (“Division”), Utah Clean Energy (“UCE”) and Western Resource Advocates (“WRA”). The Company appreciates the engagement by the intervenors and their support for the approval of the proposed innovative utility programs; the Smart Inverter Program, and the Microgrid Program. The Company’s response to specific comments and suggestions from the intervenors are provided below.

Reply to Division

In its response, the Division states *“The Division recommends the Commission direct the Company to consider how cybersecurity threats might compromise Company and third-party owned microgrids rendering the overall grid vulnerable.”* PacifiCorp recognizes the importance of cybersecurity pertinent to microgrids. However, at the early research stages, understanding the technical challenges pertinent to electrical interconnection, integration, control, and operation of variable energy resources in the Company’s service territory is more critical and of a higher priority. The Company does and will continue to monitor research initiatives on this subject that are being pursued by the US Department of Energy and other research institutions including national laboratories but, does not support researching cybersecurity threats as part of this project. Duplicating the efforts of others would not provide any additional benefits to the Company and its customers at this time.

Reply to UCE

In reply to the suggestion from UCE, the Company agrees to hold quarterly conference calls with interested stakeholders to provide regular program updates on key milestones and share preliminary findings for specific research areas.

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Informal questions should be directed to Bob Lively at (801) 220-4052.

Sincerely,



Jeffrey K. Larsen
Vice President, Regulation


Enclosures

cc: Division of Public Utilities
Western Resource Advocates
Utah Clean Energy

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2017, a true and correct copy of the foregoing was served by electronic mail on the following:

UTAH DIVISION OF PUBLIC UTILITIES
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Katie Savarin
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