

**September 21, 2015 Action Request to the Division
Status of Interconnection and Electric Service Reliability Reporting**

The Commission has the following questions/requests regarding reports on electrical interconnections (R746-312-16(2)) and electric service reliability (R746-313-7).

I. Electrical Interconnection

Electric Interconnection Reporting -- R746-312-16(2)

(2) By July 1 of each year, the public utility shall submit to the commission an annual report with the following summary information for the previous calendar year:

(a) the total number of generating facilities approved and their associated attributes including resource type, generating capacity, and zip code of generating facility location,

(b) the total rated generating capacity of generating facilities by resource type.

(c) for net metering interconnections, the total net excess generation kilowatt-hours received from interconnection customers by month.

(d) for net metering interconnections, the total amount of excess generation credits in kilowatt hours, and their associated dollar value, which have expired at the end of each annualized billing period.

Comments:

- 1) PacifiCorp has filed a net metering/interconnection report annually since 2010.
- 2) It appears other public utilities (*e.g.*, rural electric cooperatives (coops), electric service districts (districts)) neither file this report with the Commission nor provide the report to the Division.

Questions/Request:

- 1) Has the Division received any net metering/interconnection reports from any rural coop or district?
- 2) If so, please indicate how or through what means the report was provided to the Division, *e.g.*, through the annual gross revenue report or other means.
- 3) Does the Division see a value (other than compliance) for the rural coop/district interconnection/net metering reports to be filed with the Commission?

II. Electric Service Reliability

Electric Service Reliability Reporting -- R746-313-7

(2) Beginning May 1, 2013, and by May 1 of each succeeding year, an electric company shall file with the commission a report on electric service reliability for the previous calendar year. The electric company must make electronic copies of the report available to the public upon request and may charge a reasonable cost for requested paper copies.

(3) For an electric company whose governing authority is the commission, the report on electric service reliability must contain at a minimum: etc.

(4) For an electric company whose governing authority is not the commission, the report on electric service reliability must contain, at a minimum:

(a) The reliability indices listed in Form 7 - Information on Service Interruptions based upon the cause codes listed in RUS1730A-119 ; and

(b) A summary of any estimation methods and/or an explanation of any factors used in calculating reliability indices presented in the electric company's report on electric service reliability.

Comments:

- 1) PacifiCorp has filed the report semi-annually for many years.
- 2) While the rural coops are not filing the reports with the Commission, our preliminary assessment indicates many rural coops are providing the reports to the Division, possibly through the annual gross revenue reports. As shown on the attached spreadsheet, we located reports in the Division's possession.

Questions/Requests:

- 1) Please review the attached spreadsheet and verify its accuracy.
- 2) Has the Division received additional reports beyond those listed in the attached spreadsheet?
- 3) Please indicate how or through what means the report was provided to the Division, *e.g.*, through the annual gross revenue report or other means.
- 4) Does the Division see a value (other than compliance) for the rural coop/district service reliability reports to be filed with the Commission?