

Renewable Northwest Project

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Members

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Renewable Northwest Project

October 14, 2005

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket Number UE-051106

Subject: Joint Comments on Standards for Interconnection to Electric Utility
Delivery Systems

The Renewable Northwest Project (RNP), the American Wind Energy Association (AWEA), and the NW Energy Coalition (NWECA) appreciate the opportunity to provide preliminary comments regarding the creation of standards for the interconnection of generators under 20 MW for the State of Washington.

We value the Commission's desire to create interconnection standards for generators under 20 MW. Uniformity across the states is ultimately very important. For manufacturers of solar electric systems, fuel cells, wind turbines, or other potential small-scale generation units, it is crucial to be able to design and build a single unit that can be sold in every state in the country without modification. If the technical standards with which these units have to comply vary from one state to another, then the likely result is that the equipment manufacturers will have to modify their designs and their manufacturing processes to comply with a unique state (or utility) standard which will add costs for end use consumers. Or the manufacturers will abandon that state (or utility) as a potential market for their products.

The FERC standard provides an excellent framework from which to start and there is little need to stray from it when seeking adoption at the state level. There are some other states and organizations that have adopted interconnection standards that have included some helpful clarifications or additions. These are included in the list below. We encourage the WUTC to consider these improvements.

- The Colorado standards clarify the insurance requirement. FERC uses vague language while the Colorado proposal fixes amounts for residential and commercial systems. The Colorado Interconnection Standards are part of the draft PUC rules on the Renewable Energy Standards and can be found at <http://www.dora.state.co.us/puc/rulemaking/Amendment37/05R-112E.htm>.

- New Jersey clarifies the interconnections to spot and area networks. We would recommend this as well as the New Jersey approach on fees. You can find this information in the New Jersey “Net Metering and Interconnection Standards for Class I Renewable Energy “ found at <http://www.state.nj.us/bpu/wwwroot/secretary/NetMeteringInterconnectionRules.pdf>.
- The Pennsylvania Public Utility Commission's recent draft rules have a good section on dispute resolution however the rest of their draft rules are more confusing than the other examples. We would like to see the WUTC include dispute resolution in their standards. These draft rules can be found on the PA PUC web site http://www.puc.state.pa.us/electric/electric_aeps_working_groups.aspx.
- The Interstate Renewable Energy Council (IREC) has recently updated their model interconnection rules that incorporate the best practices from the NARUC, FERC, and New Jersey models. These rules all have the same substantive basis, but we believe the IREC approach is the most clear. Please reference these rules on the IREC web site <http://www.irecusa.org/connect/index.html?PHPSESSID=bd5d42d4035d6326ca7bebcc4998d1c0>.

These standards also establish procedural as well as technical requirements. Although uniformity is less essential for these procedural requirements than for technical requirements, it is still extremely helpful for a project developer to be confident that it will be facing similar requirements from one state (or utility) to the next.

We also note that RCW 80.60.040 provides a base set of interconnection standards for net metered systems no larger than 25 kW. The statute directs those systems to include all equipment necessary to meet applicable safety, power quality, and interconnection requirements established by the national electrical code, national electrical safety code, the institute of electrical and electronics engineers, and underwriters laboratories. The statute also provides the Commission and public utility governing bodies with the authority to adopt by regulation additional interconnection requirements for customer-generators that the commission or governing body determines are necessary to protect public safety and system reliability. We believe any such additional requirements should be consistent across the state for net metered systems.

Uniform standards are tremendously important to supporting the creation and implementation of economic markets for distributed technologies, including renewable technologies. We commend the WUTC for beginning a process to address such standards for Washington. And we encourage the WUTC to model its standards on the best practices of those already adopted by FERC, other states and other organizations.

All three of our organizations would appreciate being added to the list of recipients for future correspondence regarding this rulemaking.

Sincerely,

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