

September 7, 2012

Docket UE-112133

Re: Review Standards for Interconnection with Electric Generators in WAC 480-108

Comments from the Workgroup Parties, a utility sub group of the Interconnection Standards Workgroup

Please accept these comments from the undersigned parties. Please note that the undersigned parties all participated in the Interconnection Standards Workgroup that filed the Final Report and Model Rule for consideration by the Commission. However, many members of the original Interconnection Standards Workgroup are filing comments individually, signing on to others' comments, or not filing comments. Accordingly, only the undersigned parties are supporting these comments and are self-referred to in this filing as the Workgroup Parties.

Answers to Questions posed by the UTC to the Final Report and Model Rule of the Interconnection Standards Workgroup

1. Does the model rule language regarding electrical safety avoid potential regulatory mismatches with current and future Department of Labor and Industries rules regarding electrical safety? If not, please identify how such a mismatch could be avoided.

The Workgroup Parties do believe that the Model Rule utility option, under Tier 1 Technical Requirements, to exempt a facility from the requirement for a visible lockable disconnect does conflict with certain Department Labor and Industries rules requiring a disconnect switch in all cases. The original Workgroup was attempting to work with the advocates to allow removing the requirement for a disconnect switch in certain cases by including this utility option language. In the context of continuing to address the advocate's requests and acknowledging the evolution of distributed generation and electric vehicle technologies, the Workgroup Parties suggest inserting the following italicized and bolded language to the Model Rule under Tier 1 Technical Requirements, Item c.

At the utility's sole discretion, ***and where allowed by current law or regulation***, an Interconnection Customer installing and operating inverter-based systems less than 5 kW in nameplate rating that are interconnected through a self contained socket-based meter of 320 amps or less may not be required to install a visible, lockable AC disconnect switch.

2. Do the model rules remove requirements in current rules from the interconnection applicant that increase the costs to the utility of interconnecting the applicant's generation facility? Please identify

those requirements and explain if those costs unduly shift costs to utility ratepayers or between ratepayers.

Question 2 and 3 are answered below question 3.

3. Do the model rules add requirements to the interconnection applicant that increase the costs to the applicant of interconnection? Please identify those requirements and explain if they are unduly discriminatory or shift costs from a utility or utility ratepayers to the interconnection applicant.

The Workgroup Parties believe that the Interconnection Standards Workgroup was very careful in developing the Model Rule to avoid cost shifts in either direction and were largely successful. Perhaps the item that warrants Commission review for avoiding cost shifts are the application fees. The Workgroup Parties suggest that the Commission review, with the parties to this proceeding, and set final application fees to ensure recovery, but not over recovery, of utility costs for processing the application.

The Workgroup Parties spent a lot of time to make the Tier 1 and Tier 2 processes as reasonable as possible for all parties involved including development of tiers that would be less costly to the utility and the applicants when compared to the current processes. Cost reduction was not accomplished by cost shifting, but rather by an overall reduction in costs. Tier 3 costs remain unchanged to both parties. Of necessity Tier 3 projects are more labor intensive and costly to both parties and our Model Rule process did not shift costs in either direction. However see also our response to the Commission's Question 7 below regarding Tier 3.

4. Are the Tier 1, 2 and 3 application and completion processes reasonable obligations for both the applicant and the utility? Please explain why or why not.

The Interconnection Standards Workgroup devoted a substantial amount of time to discussing and developing these processes with the perspective of fairness to both the utility and developer. We believe Tier 1 and Tier 2 processes are reasonable and achievable by both the utility and developer in almost all circumstances. In those instances where a timeline is not met despite good faith on both parties, there are provisions for extending the timeline.

5. Is there an industry definition of a "radial distribution circuit" as the term is used in item 3 under "Tier 1 – applicability" of the model rule?

The Workgroup Parties suggest the following definition:

"Radial distribution circuit" means electrical service which feeds one or more utility customers originating from a single utility source at voltages greater than 600 V and less than 50 kV.

6. Is item 4 under "Tier 1 – applicability" of the model rule intended to reflect the requirements under current rule for generators with nameplate rating of 25 kW or less?

The Workgroup Parties are not sure that we are reading this question correctly. What we will say is that we developed the Tier 1 process to ensure efficient processing and minimal costs to both the utility and applicant for the majority of applications received by most utilities – single phase, inverter based facilities under 25 kW, whereas the current rule for "Tier 1" includes facilities up to 50 kW, both single and three phase, with certain exceptions and caveats that the applicant and utility had to interpret.

Tier 1 is intended to be the most streamlined application process. Ratings were set low and for specific types of equipment to allow this streamlining. It takes advantage of particular technologies of power production that have the least impact on the utility system. Reducing the kW limit to 25 allowed further streamlining of the process for the bulk of applicants with PV systems.

7. Is it possible to implement the Tier 1 and Tier 2 portions of the model rules without modifying the existing rules to include the Tier 3 portions of the model rules?

Yes. The Workgroup Parties agree that it is possible to implement, and upon reflection, we recommend, implementation of Tier 1 and Tier 2 portions of the Model Rule with only minimal, if any, modifications to current rule language that will capture the remaining facilities over 500 kW.

The Workgroup developed Tier 1 and Tier 2 to cover the bulk of the small systems that would have a minimal impact on the utility network. Tier 3 is everything else, which typically require feasibility, system impact, facilities and other studies. These studies can be complex and each utility's timeline to perform these studies will vary. Allowing each utility to set its own timelines for the Tier 3 process based upon staffing levels, number and type of applications and other utility specific criteria is therefore necessary.

Respectfully Submitted,

(all signatures electronically approved)

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