

VIA ELECTRONIC MAIL

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May 25, 2007

Carol Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: *Public Utility Regulatory Policies Act Standards
Standards for Interconnection to Electric Utility Delivery Systems
Docket UE-060649
Joint Comments of Puget Sound Energy, Inc. and Avista Corporation*

Dear Ms. Washburn:

On April 30, 2007, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments (Notice) on the draft amended rules governing the interconnection of customer-owned generating facilities to investor-owned electric utility delivery systems. Avista Corporation and Puget Sound Energy, Inc. provide the following joint comments in response to the Notice.

General Comments

In general, both Avista Corporation and Puget Sound Energy, Inc. support the draft interconnection rule as developed by the Commission. Additionally, after review of PacifiCorp's comments, both Avista Corporation and Puget Sound Energy, Inc. generally support PacifiCorp's comments filed in this docket in response to the Notice.

Specific Comments

Avista Corporation and Puget Sound Energy offer the following changes to the language provided in the draft rule language (changes to draft text are underlined for additions and striken-through for deletions).

WAC 480-108-020(1)(f)(iii)

(iii) Power quality. Installations must be in compliance with all applicable standards including, without limitation, the most current version of IEEE Standard 519–~~1992~~ Harmonic Limits, and IEEE Standard 141 Flicker as measured at the PCC.

WAC 480-108-010

“Network distribution system (spot)” means electrical service from a distribution system consisting of two or more primary circuits from one or more substations or transmission supply points arranged such that they collectively feed secondary circuits serving one or more electrical company customers not served from the grid.

Avista Corporation and Puget Sound Energy appreciate the opportunity to present their viewpoints on these issues in the Commission’s draft amended rule. Please direct any questions regarding these comments to the undersigned.

Sincerely,

Avista Corporation

Puget Sound Energy, Inc.



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