

**From:** Joan Schrammeck [mailto:joan@solarwa.org]  
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**To:** UTC DL Records Center  
**Subject:** Interconnection with Electric Generators in WAC 480-108 Docket UE-112133

Here is an additional comment from a Solar Washington member in response to UTC Notice UE-112133, Review Standards for Interconnection with Electric Generators in WAC 480-108. We pass this along as a service to our member.

I looked over the proposed interconnection rules and I believe they are a step backwards. For example, the new rule requires a lockable AC disconnect, whereas the existing rule this can be waived by the utility. In practice, none of the existing inverter disconnect switches are operated by electric utility workers when responding to outages or working on their lines.

If the solar installation meets the National Electric Code, it should automatically be deemed to have met the electric utility's interconnection standards. This is true for every other electrical device. Why should solar be treated any differently?

The 15% limits, annual testing and other restrictions that the utilities are throwing at solar installations are arbitrary and capricious. Germany has 25 gigawatts of solar connected to their electrical system and they do not require annual testing of their inverters, and their generation often exceeds the 15% limit.

If Washington really wanted to make solar installations easier and less costly, they would simply state that if it passes the electrical code inspection, it is deemed to have met the utility's interconnection standard, especially for Tier 1 installations. If the utilities don't like it, they can work to change the electric code.

The 15% peak load restriction is arbitrary and not based on any documented safety or operational issue. Solar power systems will automatically trip offline in the event of a fault on the distribution lines. Electric utilities, not the solar installers, should be required to provide documented proof that increasing the generation above 15% poses any operational or safety concerns. Increased generation will slightly increase voltages on the distribution system, similarly to the way the voltage changes when loads go up and down. Utilities can keep their supply voltages within acceptable limits by simply adjusting the settings on their load tap changers.

The essence of the electric utility's proposed interconnection standards is that they do not trust the National Electric Code or the Underwriter Laboratory (UL) approval. Utilities also want to impose burdensome interconnection requirements because they do not like net metering. They view net metering as a loss of revenue, and not a source of renewable energy. It is up to the regulators to not let the utilities impose undue restrictions on the commerce and free trade development of renewable energy.

Thank you.  
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