

August 2, 2007

**VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY**

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

Attention: Carole Washburn  
Executive Secretary

Re: ***Standards for Interconnection to Electric Utility Delivery Systems***  
**WUTC Docket UE-060649**

Dear Ms. Washburn:

On July 9, 2007, the Washington Utilities and Transportation Commission (Commission) issued a *Notice of Opportunity to Submit Written Comments on Proposed Rules* (Notice) in the above-captioned matter. The Notice seeks input from interested parties on a set of proposed interconnection rules developed by Commission staff. PacifiCorp appreciates the opportunity to comment on the proposed rule and provides the following comments and recommendations in response to the Notice.

1. **General Comments.** PacifiCorp generally supports the proposed interconnection rule.

2. **Purpose and Scope.** Proposed WAC 480-108-001(4) states:

This chapter does not govern electric company services to PURPA qualifying facilities pursuant to chapter 480-107 WAC.

PacifiCorp interprets this provision to mean that interconnection of PURPA qualifying facilities is not governed by the proposed rules. PacifiCorp respectfully requests that the Commission either (a) confirm this interpretation as part of its order adopting the proposed rules, or (b) revise the language of proposed WAC 480-108-001(4) as suggested below:

This chapter does not govern interconnection of,  
or electric company services to, PURPA qualifying  
facilities pursuant to chapter 480-107 WAC.

**3. Metering of Net Metering Systems.** The first two sentences of proposed WAC 480-108-040(7)(a) state:

(7) Metering.

(a) Net metering as set forth in chapter 80.60 RCW for solar, wind, hydropower, fuel cells and facilities that simultaneously produce electricity and useful thermal energy. The electrical company will install, own and maintain a kilowatt-hour meter, or meters as the installation may determine, capable of registering the bi-directional flow of electricity at the point of common coupling at a level of accuracy that meets all applicable standards, regulations and statutes.

PacifiCorp interprets this provision to apply only to those facilities that meet the definition of a "net metering system" under chapter 80.60 RCW. PacifiCorp respectfully requests that the Commission either (a) confirm this interpretation as part of its order adopting the proposed rules, or (b) revise the language of proposed WAC 480-108-040(7)(a) and adopt a definition of the term "net metering system" as suggested below:

(7) Metering.

(a) For net metering of a net metering system as set forth in chapter 80.60 RCW, ~~for solar, wind, hydropower, fuel cells and facilities that simultaneously produce electricity and useful thermal energy.~~ The electrical company will install, own and maintain a kilowatt-hour meter, or meters as the installation may determine, capable of registering the bi-directional flow of electricity at the point of common coupling at a level of accuracy that meets all applicable standards, regulations and statutes.

WAC 480-108-010 Definitions

**"Net metering system"** shall have the meaning established in RCW 80.60.10(9).

**4. Record of Cumulative Effects of Interconnections.** Proposed WAC 480-108-065 states:

**WAC 480-108-065 Cumulative effects of interconnections with a nameplate capacity rating of 300 kW or less.** Electrical companies will evaluate on an ongoing basis, but not less than once every five years, the cumulative effect, including benefits to its other customers, of interconnections made under Part 1 of this chapter on its electric system and will retain appropriate records of its evaluations.

Proposed WAC 480-108-120 establishes a similar requirement to maintain records of cumulative effect with regard to interconnections with capacity greater than 300 kW but no more than 20 MW.

PacifiCorp intends to meet these requirements by including analysis of all customer-based generation of 20 MW or less as part of PacifiCorp's distribution planning study program. This program evaluates reinforcement requirements of all of PacifiCorp's distribution circuits on a rotating basis such that all circuits are studied at least once every five years (faster-growing areas are examined more often). For its Washington service territory, PacifiCorp intends to include the following within its planning studies:

1. A map or maps identifying the location and size of each of the interconnections being studied; and
2. An analysis of the impact of removing all of the existing interconnections from PacifiCorp's facilities, which will take the form of identifying reinforcement that would otherwise be necessary if that generation were not present.

PacifiCorp respectfully requests that the Commission either (a) confirm, as part of its order adopting the proposed rules, that the approach described above will satisfy WAC 480-108-065 and WAC 480-108-120, or (b) clarify what additional record keeping is required to comply.

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PacifiCorp appreciates the opportunity to participate in the Commission's interconnection rulemaking process. Please direct any questions regarding these comments to Shay LaBray, Regulatory Affairs Manager, at (503) 813-6176.

Respectfully,

A handwritten signature in black ink that reads "Andrea L. Kelly" followed by a stylized flourish.

Andrea L. Kelly  
Vice President, Regulation

cc: Dick Byers, WUTC