

**August 2, 2007, Comments on CR-102 (July 5) of Amendments to WAC 480-108**

**ELECTRIC COMPANIES--INTERCONNECTION WITH ELECTRIC GENERATORS**

**(Matrix includes all persons that submitted comments in any phase of the rulemaking inquiry)**

	<b>Comment/Issue</b>	
<b>PacifiCorp</b>	<p>PacifiCorp generally supports the proposed interconnection rule.</p> <p>PacifiCorp seeks clarification that proposed WAC 480-108-001(4) means that “interconnection of PURPA qualifying facilities is not governed by the proposed rules.”</p> <p>PacifiCorp seeks clarification that proposed WAC 480-108-040(7)(a) applies “only to those facilities that meet the definition of a ‘net metering system’ under chapter 80.60 RCW.”</p> <p>PacifiCorp seeks clarification that the requirements to evaluate the cumulative effects of interconnections specified in proposed WACs 480-108-065 and 480-108-120 may be met by “analysis of all customer-based generation of 20 MW or less as a part of PacifiCorp’s distribution planning study program.”</p>	
<b>Public Counsel</b>	<p>Public Counsel supports adoption of the rule amendments as proposed.</p> <p>Public Counsel notes that the proposed rule ensures that interconnection charges are cost-based and are charged based on causation. The dispute resolution process is available to interconnection customers to dispute cost assignment if other customers are shown to benefit from an interconnection. According to Public Counsel, “strike a fair division of costs between the interconnection customer and other ratepayers.”</p>	
<b>ICNU</b>	<p>ICNU supports adoption of the rule amendments as proposed.</p> <p>ICNU notes that the rule accommodates the possibility that interconnection costs may be shared between the interconnection customer and the utility if the interconnection is demonstrated by the utility to provide benefits to other customers. The interconnection customer is afforded the opportunity to argue for such benefits through the dispute resolution process.</p>	
<b>Avista</b>	None	
<b>PSE</b>	None	
<b>WA Load Serving Utilities</b>	None	
<b>Vote Solar Initiative</b>	None	
<b>Benton Rural Electric Cooperative</b>	None	

<b>Northwest CHP Center</b>	None	
<b>United States Combined Heat and Power Association</b>	None	
<b>U.S. Environmental Protection Agency</b>	None	
<b>Allied Electric (Chuck Collins)</b>	None	
<b>Parker V. Holden</b>	None	
<b>David Kaplan V2Green, Inc.</b>	None	