



U.S. DEPARTMENT OF ENERGY

Northwest Clean Energy Application Center

Promoting CHP, District Energy, and Waste Heat Recovery

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December 21, 2012

Docket UE-112133 Response to Notice of opportunity to submit Written Comment on Interconnection Draft Rules

The U.S. Department of Energy Northwest Clean Energy Application Center appreciates the leadership of the Washington Utility and Transportation Commission has taken to improve the interconnection ground rules in the state of Washington. The series of inquiries, workshops and model rule development efforts have been both helpful and illuminating. Thank you for the opportunity to provide comments on the draft rules. Our comments focus on Tier 3 (500kW to 20 MW) sections of the draft rules. Your fourth question reads as follows:

“4. Are there additional terms and conditions, time constraints, or other provisions found in the Tier 3 section of Chapter 2 of the model rules that could improve the installation and operation of facilities interconnected under the Tier 3 process as proposed in these draft rules?”

Many states have established a common statewide set of interconnection terms and conditions, time lines, and other provisions above the level of 500 kW. Further information can be found at the interconnection standards portion of the EPA CHP Partnership website <http://www.epa.gov/chp/policies/interconnection.html>. For example, in 2009, Oregon adopted small generator interconnection rules up to 10 MW for jurisdictional facilities. See Docket AR 521 (Order No. 09-016) at <http://apps.puc.state.or.us/edockets/docket.asp?DocketID=14256>.

The Washington draft rules provide a broad rule framework for Tier 3 interconnections with each investor owned utility submitting their own interconnection service tariff that meets the guidelines established by the commission. The Oregon Public Utility Commission rules noted above and the Washington model rules as distributed on July 13, 2012 both include greater detail for larger systems above 500 kW. This additional detail sets forth a series of timelines including:

- Notice of receipt of application;
- Response to whether or not an application is complete; and
- Completion of incomplete applications

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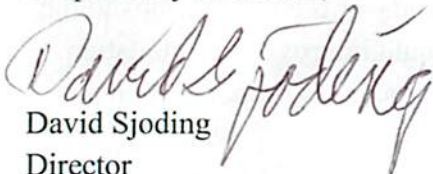
Cooperating agencies: Washington State University Extension Energy Program, U.S. Department of Energy, Alaska Energy Authority, Idaho Department of Water Resources Energy Division, Montana Department of Environmental Quality Energy Program and Oregon Department of Energy

The specificity of the Oregon approach provides a comprehensive basis for interconnection that Washington can look to. It also enables distributed generation project developers to have a more consistent set of ground rules and expectations within which to work with end-users to develop projects.

Finally, the Washington draft rules improve the ability to interconnect within spot network distribution systems. These interconnections are in a more complex setting due to two or more substations or transmission supply points providing power to a facility or downtown area. Con Edison, which serves New York City, has many spot networks and hosts two-day training sessions on their interconnection process and requirements. This process may be useful for Washington utilities.

Thank you for the opportunity to provide comments. If you have any questions, I can be reached at (360) 956-2004 or via email at sjodingd@energy.wsu.edu.

Respectfully submitted,


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