STATE REPRESENTATIVE
40th DISTRICT

JEFF MORRIS

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Washington
House of
Representatives

TECHNOLOGY, ENERGY
& COMMUNICATIONS
CHAIR
_____
APPROPRIATIONS SUBCOMMITTEE
ON GENERAL GOVERNMENT
& AUDIT REVIEW

THE COUNCIL OF STATE
GOVERNMENTS – WEST
CHAIR
_____
PACIFIC NORTHWEST
ECONOMIC REGION
PAST PRESIDENT

August 21, 2007

Chairman Mark Sidran
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Post Office Box 47250
Olympia, WA 98504-7250

RECEIVED
AUG 2 2 2007
CHAIR, WUTC

To Chairman Sidran:

Re: Public comment on proposed rulemaking on Electricity Standards (PURPA)

I am contacting you in regards to the public comment period on rulemaking related to
WAC 480-108-020, entitled "Electricity Standards (PURPA)" (docket number 060649.

I understand that the Utilities and Transportation Commission (UTC) is providing
additional time, until August 22, 2007, to submit written comments on the proposed
rules. I would like to thank you for allowing this additional time to gather comments
from stakeholders. As you are aware the interconnection standards under development
are important to the advancement of clean, renewable energy resources for our state and
every effort should be made by the UTC to carry out the legislative intent behind these
rules.

I have two concerns about the current interconnection standards as currently drafted by
UTC.

1. Net Metering
In the proposed draft, WAC 480-108-020, Section (2), Subsection (e) requires evidence
provided by the interconnection customer that the "generating facility will never cause
reverse current flow through the electrical company's network protectors". As drafted, it
is my concern that these rules will prohibit net metering customer-generators from
exporting electrical power generated by a net metering system connected to the grid.

Net metering laws were established to encourage independent, alternative, clean electrical
power production. The benefits of net metering to the stability of the electrical grid are
immense and well documented. I request that you modify you proposed changes to
WAC 480-108-020 to ensure that the opportunity to net meter for small to mid-size
distributed generation in Washington State is not compromised.

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2. Interconnection Standards

In 2005, the Legislature passed Senate Bill 5101. This bill requires uniform standards for interconnection to the electric distribution system when light and power businesses serving eighty percent of the total customer load in the state adopt uniform standards for interconnection to the electric distribution system. The interconnection standards established by light and power businesses must have **ninety percent of total requirements the same.**

The intent of the legislation that the interconnection standards will provide customer-generators with the opportunity to both export electricity back to the grid through net metering and receive incentive payments for the production of renewable energy. I would like to request that every effort be made by the UTC to guarantee that the interconnection standards under development fulfill this ninety percent requirement. The ninety percent similarity was placed in statue so that entities that market these technologies would not face a barrier in developing sixty three variable interconnections for the same generation technology. The three utilities regulated by the UTC should also not be allowed more then a ten percent variance in similarity for the same generating technology.

It is my hope that current interconnection standard rulemaking will not change the original intent of the interconnection standards and net metering legislation.

Thank you for your attention to these concerns.

Sincerely,

Representative Jeff Morris

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