
From: Hummel, Elizabeth [mailto:Hummel.Elizabeth@leg.wa.gov]
Sent: Wednesday, August 22, 2007 3:01 PM
To: Sidran, Mark (UTC)
Cc: Danner, Dave (UTC)
Subject: Public comment on proposed rulemaking on Electricity Standards (PURPA)
Importance: High

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

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 would like to add my voice to the public comment on this proposed rule making, and thank you for taking 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. The members of the Technology, Energy and Communications Committee have spent a significant amount of time on these issues and I am concerned about the possibility of the UTC limiting the original intent of the legislation as passed.

I will keep comments brief concerning my two largest concerns, as I am sure you are familiar with the issues.

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.

It is my opinion that this language would undermine any net metering in our state, and undermine the legislation passed by the Legislature creating net metering. There is great benefit to net metering and almost by definition it must reverse current flow from a small

generator into the grid. I suspect that this language is prompted by safety concerns, and I suggest that the language be much clearer, so as not to create the impression that the UTC wants to get rid of the policy passed by the Legislature.

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 is 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 statute 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 than a ten percent variance in similarity for the same generating technology. It is my belief that the UTC should be encouraging standardization, and more stability in the grid and not changing the law passed by the Legislature.

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,

Zack Hudgins
Majority Floor Leader
Vice Chair Environmental Health Committee
State Representative - 11th District

Office Contact:
326 JLOB | PO Box 40600 | Olympia, WA 98504-0600
Hotline: 800.562.6000 | Fax: 360.786.7317
<http://www.leg.wa.gov/house/hudgins/>

Call the Hotline:
Have a message for Zack and want a handwritten personal note as a response? Call the Hotline

at 1-800-562-6000.

See Government Waste?

If you see a place where we can use your tax dollars more efficiently, tell me. We always need to watch our budget.