

**NW Energy Coalition comments on
Washington Utilities and Transportation Amendments to WAC 480-108
Submitted by
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The NW Energy Coalition (Coalition) is pleased to provide comments to the Washington Utilities and Transportation Commission (Commission) on amendments to WAC 480-108, addressing interconnection standards for consumer-owned electric generators.

The Coalition believes that standards for interconnection are necessary to advance the commercialization of distributed generation systems and to ensure performance, safety and maintenance requirements are met. We believe a strong standard should apply to investor and publicly owned utilities and would prescribe clear and direct directives for all parties involved without the need for systems to be reviewed on a case-by-case basis. We have concerns with the following language in the amendments.

Section 1(f) i

IEEE1547 is the best technical standard for interconnection and should not be omitted from the list of applicable codes in Section 1(f) i. The 2005 US Energy Policy Act clearly states that "Interconnection services shall be offered based upon the standards developed by the Institute of Electrical and Electronics Engineers: IEEE Standard 1547 for Interconnecting Distributed Resources With Electric Power Systems, as they may be amended from time to time." IEEE 1547 should be reinstated in this section.

At the same time, the Coalition has concerns about the multiple codes that are to be met in Section 1(f) i, and feel that the numerous multiple codes will not add the clarity and transparency that a standard is intended to give. A decision to omit IEEE 1547 but to keep multiple codes including electric service company requirements adds to confusion and ambiguity. The section states that all interconnections must conform to all applicable codes. The Coalition is concerned that in many cases the multiple codes will not concur with each other. There is no statement on priority or resolution of conflict between the codes. This vagueness weakens any standard, and adds to the complexity and confusion of interconnection, which should be avoided.

The company's written electric service requirements should be removed from the amendment and replaced with the industry accepted IEEE 1547. As the amendment is currently written, an electrical company's written electric service requirement could supercede other listed codes in the amendment and therefore negates any statewide standard.

Section 4

The Coalition believes that a third party should be allowed for supplemental review processes along with the electric provider's estimate. This way the customer can choose the most cost effective manner to complete any review required.

Section 7

Language in Section 7 (a) allows the electrical company to require any meter parameters that they specify. Such unknowns and variability from customer to customer could place unnecessary barriers to interconnection and could restrict legitimate systems from connection. The Coalition believes more clarity is necessary to avoid future conflicts and uncertainty.

The Coalition has additional concerns in Section 7 (b) that allows the electric company to require separate metering, including remote access metering. This provision could significantly increase costs for customers, is unnecessary and should be omitted from this standard.

Section 11

The Coalition believes that electric companies should be able to restrict interconnection when there are concerns about safety and reliability. Any determination to restrict interconnection based on provisions in this section should be subject to public review and approval by the commission. This will ensure that interconnection customers are not unfairly restricted.

Section 14

Section 14 should be omitted from this amendment. The Coalition believes that post-interconnection changes to the utility system should be covered by the utility. Other classes of customers are not responsible for utility changes and modifications; therefore interconnection customers should not be subject to these costs either.

New Section

The language in "Alternative Interconnection Service Tariff" allows the electric provider to file an alternative to the interconnection service tariff. This provision allows an electric utility to either not comply or establish a different standard. This undermines the rulemaking process that has just occurred and is counter to the point of establishing a common standard across the state. This is inappropriate and has no place in an interconnection standard.