

March 6, 2013

VIA ELECTRONIC FILING

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Attn: Steven V. King
Acting Executive Director and Secretary

**RE: Docket No. UE-112133 – Comments
Review Standards for Interconnection with Electric Generators in WAC 480-108**

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to Submit Written Comments on Revised Interconnection Draft Rules (Notice) issued in Docket UE-112113 on February 5, 2013.

In the Notice, the Commission requested written comments on revised draft rules that amend and replace the current rules governing the interconnection of generation facilities with utility electric systems. Specifically, the Commission invited comments on the latest changes to the rules, focused on the elimination of duplication in WAC 480-108-BBB, and the consolidation of all application procedures and timelines into WAC 480-108-CCC. In addition, the Commission invited comments on the addition of a notification requirements for anticipated voltage irregularities in section WAC 480-108-FFF(23). As requested in the Notice, the Company will not repeat concerns that were raised in prior comments. However, though not repeated here, prior comments nonetheless remain concerns of the Company to the extent those issues are not addressed by the revised rules.

A. Application Fees 480-108-AAA(7)

The Company proposes adding a subsection to the rules to address the situation where an interconnection customer withdraws an application during the interconnection review process, and resubmits a modified application in a timely matter.

(7) If an Interconnection Application is later deemed withdrawn, the application fee shall be applied to a request for reapplication if submitted within thirty (30) business days.

B. Disconnect Switch Location 480-108-BBB(2)(a)(4)(A)

The revised rules should include additional clarity with respect to the required location of the disconnect switch. Under the current WAC 480-108-020(2)(a), the disconnect switch "must be located adjacent to electrical company meters." This has the benefit of clearly laying out expectations for a customer generator and the electrical company in the placement of the

disconnect switch. The Company recognizes that there is value in providing some flexibility in location of the disconnect switch. However, additional guidance is needed regarding where to place the disconnect switch.

The revised rules state that the disconnect switch be “accessible to electrical company personnel at any time of the day” and be “located between the production meter and the sub-panel or other connection to the generating facility.” This will likely limit the usefulness of the disconnect switch as a safety device; if utility personnel cannot easily locate the disconnect switch they are likely to rely on other methods to disconnect the facility.

The Company proposes revised language that will provide direction on the preferred location of the disconnect switch, while still providing flexibility in situations where the circumstances suggest flexibility is appropriate. The Company’s proposed revision to the rule also lays out specifics on what signage would be required to ensure that the disconnect switch can be located by utility personnel.

480-108-BBB(2)(a)(4)(A)

Except as provided in subsections C, D, and E of this subsection, the generating facility must include a UL listed AC disconnect switch, accessible to electrical company personnel at any time of the day, that provides a visible break, is lockable in the open position, and is located no more than 10 feet from the electrical company meter. The disconnect switch may be located more than 10 feet from the electrical company meter if permanent instructions are posted at the meter indicating the precise location of the disconnect switch and the electrical company approved the location of the disconnect switch prior to the installation of the Interconnection Facilities.

C. Timelines 480-108-CCC

The Company recommends that the timelines in the proposed rules be shortened. Excessive timelines can slow the interconnection process and lead to problems in queue management. As such the Company proposes shortening the timelines to mirror those included in the Federal Energy Regulatory Commission Small Generator Interconnection Procedures.

D. Cost Disputes 480-108 CCC(3)(c)(iii)

Under revised WAC 480-108-CCC(3)(c)(iii)(B), if additional studies or facilities are required by the electrical company, an interconnection customer may supply an alternative cost estimate from a third-party qualified to perform the studies required by the electrical company. This provision should be removed because there is little to be gained by allowing this practice. A study conducted by a third-party is very unlikely to cost less to perform and will require additional administrative costs including gathering and providing the required information to a third-party to conduct the study and reviewing the results. Section WAC 480-108-100, Dispute Resolution, already provides a method for the applicant to challenge the validity of the study fees through review by the Commission.

E. Insurance 480-108-FFF(14)

The proposed rules include a prohibition against the need for additional insurance for systems under 100 kW. The Company has concerns about this prohibition noting that in situations where the customer generator does not have insurance a litigant may seek to receive compensation from the electric company. To limit this risk the Company proposes some modifications to the proposed rule similar to those found in other states.

(14) Insurance. No additional insurance is necessary for a generating facility under 100 kW. *An Electric Company shall not be liable directly or indirectly for permitting or continuing to allow an attachment of a facility, or for the acts or omissions of the customer generator that cause loss or injury, including death to any third party.*

F. Notification of Anticipated Voltage Irregularities 480-108-FFF(23)

The Company has significant concern about the difficulty and the cost of implementing the proposed rule regarding the notification of anticipated voltage irregularities. The costs of complying with this rule far outweigh any benefit. Significantly, this requirement is likely to result in higher costs to all Washington retail customers rather than interconnection applicants. The cost of examining voltage irregularities is likely to far exceed the currently proposed application fee structure. As a result, the potentially significant incremental cost of examining voltage irregularities shifts costs for studies (as well as any minor modifications required) on the electric company and its customers in Tier 1 review situations, rather than on the customer generator.

Additionally, there are significant engineering concerns regarding the operation of the distribution system at limits more strict than current ANSI standards when distributed generation is present.

G. CONCLUSION

PacifiCorp appreciates the opportunity to provide comments and encourages the Commission to take these into account when finalizing the rules.

If you have any questions regarding these comments, please contact Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement at (503) 813-6389.

Sincerely,

Handwritten signature of William R. Griffith, with the initials 'PBD' written at the end of the signature.

William R. Griffith
Vice President, Regulation