

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE WASHINGTON )  
UTILITIES AND TRANSPORTATION ) DOCKETS UE-151069 AND U-161024  
COMMISSION’S INVESTIGATION INTO )  
ENERGY STORAGE TECHNOLOGIES )  
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**COMMENTS OF INVENERGY**

Invenergy, LLC (“Invenergy”) appreciates the opportunity to comment on the draft policy statement on treatment of energy storage technologies as requested by the Washington Utilities and Transportation Commission (“Commission”) in Dockets UE-151069 and U-161024.

Invenergy developed, built, and operates five energy storage assets totaling 68 MW and is developing multiple projects throughout the country, including in Washington state. Invenergy also owns and operates wind and natural gas generating assets in Washington and has wind and solar development interests in the state.

Invenergy appreciates and supports the Commission Staff’s draft policy statement, which Invenergy expects will bring significant ratepayer and environmental benefits to Washington. The statement’s proposal to include consideration of energy storage in prudence determinations for generation, transmission and distribution resources is particularly noteworthy and should deliver savings to ratepayers, if implemented. Invenergy agrees with and supports the comments of the Energy Storage Association (“ESA”), Renewable Northwest (“RNW”), and the Northwest and Intermountain Power Producers Coalition (“NIPPC”) insofar as they recommend further refinements to the Commission’s policy statement on energy storage. In particular, Invenergy agrees that this policy statement should not discourage utilities from procuring energy storage resources prior to a final order in this proceeding.

In addition, the Commission has appropriately asked whether other issues or topics should be addressed beyond those included in its initial notice. Invenergy appreciates and agrees with the

Commission's directive that energy storage resources should be competitively procured. In addition, Invenergy believes that the Commission's order to utilities to provide additional cost data to help Independent Power Producers better tailor their bids to fit the utility's specific needs will be instrumental in bringing additional energy storage projects online in Washington. Although the Commission's instant inquiry does not directly concern interconnection rules, changes to those rules are also required to bring the full benefits of energy storage to the state. With the understanding that the Federal Regulatory Energy Commission ("FERC") retains jurisdiction over interconnection to the transmission grid, energy storage projects that interconnect to the distribution grid of investor-owned utilities in Washington are subject to this Commission's interconnection rules. Invenergy raises two issues that this Commission may be able to address through revision of its Interconnection Rules in Washington Administrative Code Title 480 Chapter 108.

First, utilities should be encouraged or required to communicate electronically with interconnection customers. The current rules give the interconnection customer and the utility the option of submitting<sup>1</sup> and responding<sup>2</sup> to interconnection applications electronically. However, in our experience, utilities have opted to use paper-based methods of communication, which may unnecessarily add costs, delays, and other burdens to the project. The Commission should: (1) consider whether revising its Interconnection Rules may address this issue; and/or (2) encourage the utilities to change their FERC-jurisdictional procedures to require electronic communication.

Second, interconnection customers should not be required to provide all of the information necessary to perform feasibility, system impact, and facility studies at the outset to have a "complete application." This requirement may impose unnecessary costs on developers when, for example, a project might pass the feasibility study but not the system impact study. In that case, the costs incurred to provide the information required to perform a facility study would be wasted. Moreover, it is possible that as a result of a conclusion in the feasibility study, different information might be required to perform

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<sup>1</sup> WAC 480-108-030-3.

<sup>2</sup> WAC 480-108-030-7.

a system impact or facility study than if that conclusion had not been reached. In that case, the costs incurred to provide the initial information for the system impact and facility study would be wasted. The Commission should: (1) consider whether revising its Interconnection Rules may address this issue; and/or (2) encourage the utilities to change their FERC-jurisdictional procedures to allow for iterative information sharing rather than up-front provision of all information.

Invenergy is encouraged by Commission Staff's draft policy statement and believes that, if implemented, Washington will save money and lower emissions. Invenergy respectfully requests that the Commission consider whether changing its Interconnection Rules may further remove barriers to the deployment of cost-effective energy storage. We also request that, if changes to FERC-jurisdictional procedures are required to remove these barriers, utilities be encouraged by the Commission to do so. Thank you for the opportunity to provide comments and we look forward to working with the Commission to bring more cost-effective energy storage to Washington.

Sincerely,

/s/ Orijit Ghoshal

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