

Subject: UTC proposed rulemaking on generator interconnection

SENATE INTERNET E-MAIL DELIVERY SERVICE

TO: Senator Rodney Tom

SUBJECT: UTC proposed rulemaking on generator interconnection

MESSAGE:

Senator Tom,

I am contacting you with a sense of urgency regarding an ongoing proposed rulemaking at the Washington Utilities and Transportation Commission. The docket number is 060649 and it is titled "Electricity Standards (PURPA)".

The issue at hand is the process by which small to mid-sized electrical generators are interconnected with a utility company's electrical service 'grid'. The docket was first introduced in Spring of 2006 and, after subsequent public comment periods, an adoption hearing was held on August 15th, 2007. Due to the testimony of myself and one other person (there were only three total), Chairman Sidran has agreed to postpone the adoption of this proposed rulemaking to allow for a few more days of public comments (to end on August 22, 2007).

While I have many concerns about this proposed rulemaking, there is one specific issue I thought I should bring to your attention. In the proposed rulemaking, WAC 480-108-020, section (2), part (e) disallows "reverse current flow through the electrical company's network protectors". If passed as written, this language will negate any future (and current) Net Metering opportunities in the State, thus neutralizing the ground-breaking SB 5101 law (titled "Providing incentives to support renewable energy") that was passed a couple of years ago. "Reverse current flow" is engineering-speak for 'export of electrical power from an independent power producer's generator into the grid'. Without the ability to export power into the electric-grid, Net Metering in this State will cease. This proposed rulemaking applies to all generator interconnection requests under 20MVA, thus encompassing the limits set forth by the Net Metering laws in this State of 100kW or less.

This very important proposed rulemaking effectively sets up the utility companies in the State to block out any small to mid-size generator interconnection requests. The result of this has profound implications for State economic development as well as overall electrical system reliability. Distributed generation has been investigated at length by other states (including the Federal gov't) and has repeatedly demonstrated an overall system benefit to both the utility companies and its ratepayers. I urge you and your colleagues to delay and/or block the attempt by the UTC to adopt the rules as written, and to make a formal recommendation for the State to investigate the inherent benefits of distributed energy resources (as has been done in other states - most recently in California and Hawaii). While Chairman Sidran has agreed to extend the public comment period to August 22nd, the common citizen has no real guarantee that our comments will stop this from happening. I have personally been providing comments for the

last 6 months to this proceeding and, while the UTC has been good to incorporate many of my (and others) comments, this latest draft version has somehow taken a 'detour' from what was expected.