

Gavin Tenold  
Northwest Renewables  
1208 S Elm  
Spokane WA 99204

November 20, 2017

Executive Director and Secretary  
Washington State Utilities and Transportation Commission  
1300 S Evergreen Park Dr SW  
PO Box 47250  
Olympia WA 98504-7250

REG: CR-101 Docket UE-171033

Dear Commissioners and Staff,

Regarding WAC 480-100-109 through 480-100-199

**480-100-108:** Applications for a Community Solar project located along a traditional utility's transmission lines would not follow such a linear process of an order. Subscriptions by Project Participants could conceivably fill quickly, which would result in Community Solar Companies needing a process to refuse service.

**480-100-123(1c):** As currently written does not allow for Community Solar Companies to install Community Solar in a micro-grid orientation whereby a Community Solar Company would take advantage of Power Purchase Agreements with Project Participants. I would suggest edits to allow for such installations.

**480-100-188(2):** I suggest that Community Solar Companies need not take such cash payments from Project Participants.

**480-100-193 through 480-100-199:** I suggest that Community Solar Companies would only be responsible for providing disclosure of such tariffs to Potential and Current Project Participants as well as to the UTC. Public disclosure of such arrangements is presumably for Utilities operating in a more public sphere transmission.

**480-100-203:** Suggest that Community Solar Companies utilize General Accounting Principles, not FERC Code for these substantially smaller operations that are not multistate and transmission in nature.

**480-100-238:** Community Solar Companies ought not to be subjected to the Integrated Resource Planning Process.

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**480-100-242 through 480-100-262:** It is important that Community Solar Companies be allowed to issue Securities as freely as the Company sees fit. Given the private nature of Community Solar Companies, such regulation does not allow for such flexibility.

Regarding WAC 480-14

The Regulation of Community Solar Companies under less onerous Code such as 480-14 seems to fit the Community Solar Project Services very well. Though it should be noted that solar is electronic in nature and not Hazardous. Fee requirements ought to reflect such limited risk to the public.

**480-14-250:** Again, Solar is electronic in nature and not Hazardous, insurance requirements ought to reflect such risk

Regarding ESSB 5939

All Community Solar Projects ought to be published on the UTC's list.

Thank you for opportunity to provide the above input.

Regards

Gavin G. Tenold  
Northwest Renewables