



May 16, 2013

Washington Utilities and Transportation Commission  
Attn: Steven V. King, Acting Executive Director and Secretary  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Docket # UE-112133**

**Rulemaking to Consider Proposed Changes in Existing Interconnect Rule, WAC-480-108**

Northwest SEED has a long history of supporting community scale clean energy in the Pacific Northwest for the health of our local economies, communities, and quality of life. We are responding to the Washington Utilities and Transportation Commission's Notice of Opportunity to Submit Comments on the Proposed Rules for Interconnection. We appreciate the UTC's timely review of interconnection standards and support continuing to make interconnection more streamlined and standard across the state, to reduce barriers to renewable generation.

We would like to reiterate our support for several provisions that specifically bear on rooftop solar PV interconnection:

*Creating a Tier 1 Track for systems 25 kW and less*

This will ensure that small systems which meet standard screens will be approved for interconnection in an efficient, predictable fashion.

*Allowing L&I to determine whether an External AC Disconnect switch is necessary*

Solar PV installations are required to follow National Electric Code and to use UL 1741 listed inverters which have anti-islanding protection. In addition to these safety features, there are multiple mechanisms for physically disconnecting a PV system from the grid, should the need arise. In practice, utilities find it impractical to manually disconnect each installation in the case of a power outage and thus, requiring this particular switch is obsolete and unnecessary.

*Prohibiting additional insurance requirements for systems under 100 kW.*

Currently, net metered systems (up to 100 kW) are not required to purchase additional insurance and this minor change will ensure that non-net metered systems are treated similarly. However, if and when the net metering system size is raised, this rule ought to be amended to cover all systems that meet the allowable size limits for net metering.

*Defining a Third Party Owner*

We commend the UTC for affirming RCW 80.60.010 which defines a customer generator as a "user" (not an "owner") of a net metering system. We encourage the UTC to go further, to clarify that owning a generating system used by a net metered customer does not inherently

1402 3<sup>rd</sup> Ave., Suite 901 • Seattle, WA 98101 • [www.nwseed.org](http://www.nwseed.org)  
206.328.2441 • FAX: 206.770.6570 • [info@nwseed.org](mailto:info@nwseed.org)



subject the owner to regulation by the UTC as a public service company. We support the more detailed comments on this issue submitted by Renewable Northwest Project.

Northwest SEED appreciates the Commission's efforts to reduce regulatory barriers to the deployment of distributed generation in Washington. By creating streamlined, standardized interconnection procedures, we reduce the soft costs for utilities and for generation customers. We urge the UTC to regularly review these interconnection standards so that they can be kept up to date with new technology developments and continue to promote the deployment of distributed renewable energy generation in Washington.

Thank you for your consideration.

Respectfully,



Jennifer Grove  
Executive Director



Linda Irvine  
Project Manager