

May 17, 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—Final 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 Proposed Rules (Notice) issued in docket UE-112113 on April 17, 2013.

In general, the Company is supportive of the proposed rule amendments and appreciates the time and effort taken by Commission Staff to engage stakeholders and respond to concerns in a timely and thoughtful manner. In particular, the Company agrees with and supports the clarification in the proposed rules that an interconnection customer must also be the customer-generator of net-metered facilities. This clarification will avoid the significant regulatory and administrative ramifications of being required to enter into contractual arrangements with third-party owners of net-metering facilities.

While the Company is generally supportive of the proposed rule amendments, issues raised in prior comments, though not repeated here, remain concerns of the Company to the extent they are not addressed by the proposed amendments.

In addition, the Company provides the following additional comments below.

A. Timelines 480-108-CCC

The Company recommends that the language in the proposed rule be changed. The modification clarifies queuing order which could potentially impact required upgrades and costs applied to an interconnection customer's project. The proposed language brings the rule into alignment with current queuing procedures.

480-108-030(7)

The timeline for the application review process begins when the interconnection application and application fee are received. A project enters the interconnection queue on the date that the electrical company sends a notice of application receipt to the interconnection customer, as described in section 6. An electrical company may send any notice described in this section by electronic mail.

B. 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. PacifiCorp believes that without the specific system knowledge of system conditions and upcoming internal capital projects, no third-party would be qualified to perform any study on the PacifiCorp electrical system. PacifiCorp reiterates that this additional step required prior to all interconnection studies could unduly add time into the study schedule. PacifiCorp feels that by negotiating costs and timelines of a study prior to the study's start with commission oversight is unnecessarily burdensome. In no other state where PacifiCorp does business is the agreement of cost and timeline to complete a study required prior to the study start. Section WAC 480-108-100, Dispute Resolution, already provides a method for the applicant to challenge the validity of the study fees and timelines through review by the Commission.

C. 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,



William R. Griffith
Vice President, Regulation