

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

DOCKET UE-112133

COMMENTS OF TACOMA POWER RESPONDING TO NOTICE OF  
OPPORTUNITY TO COMMENT ON DRAFT INTERCONNECTION  
RULES ISSUED APRIL 16<sup>TH</sup>, 2013

May 17, 2013

Thank you for the thoughtful revisions to the latest draft of the proposed changes to WAC section 480-108 via docket (UE-112133) regarding the interconnection of small generators. Tacoma Power believes the proposed rules will simplify and streamline the interconnection process for most customers.

The February 5, 2013 version of the rules contained conflicting clauses regarding Tier 1 application on network circuits, so Tacoma Power proposed eliminating only **480-108-BBB(1)(a)(ix)** to fix the conflict. Tacoma Power is concerned that April 16<sup>th</sup> version removed both **480-108-BBB(1)(a)(iii)** and **480-108-BBB(1)(a)(ix)**, thereby removing all restriction on Tier 1 connections to network systems. Tacoma Power supports either reinstating the “radial only” restriction previously in **480-108-BBB(1)(a)(iii)**, or adding **480-108-020(1)(b)(Viii)** to Tier 1 so that both Tier 1 and Tier 2 applications have the same restrictions regarding network systems.

If the Commission prefers closer alignment with FERC’s current Small Generator Interconnection Procedures section 2.2.1.3, further modifications could be made. The definition of spot network in SGIP section 2.2.1.3 is a general term describing any network using network protectors. The definitions proposed in this rule for “spot network” and “grid network” delineate the topologies of specific networks. The technical challenges for distributed generation are similar for both kinds of networks, so there is no need to define them separately. Additionally, the term “grid network” is defined, but never used within rule. The only reference spot network in section **480-108-020(1)(b)(Viii)** should refer to the more general concept of a network, not the specific topology of the defined term. Thus the following changes could be made:

1. Removing the defined term: "**Grid network distribution system**" means electrical service from a distribution system consisting of two or more primary circuits from one or more substations or transmission supply points that collectively feed secondary circuits serving more than one location and more than one electrical company customer."
2. Removing the defined term: "**Spot network distribution system**" means electrical service from a distribution system consisting of two or more primary circuits from one or more substations or transmission supply points arranged such

that they collectively feed a secondary circuit serving a single location (e.g., a large facility or campus) containing one or more electrical company customers.

3. Revising the defined term “Network protectors” to eliminate the word “spot” so that it states: "**Network protectors**" means devices installed on a ~~spot~~ network distribution system designed to detect and interrupt reverse current-flow (flow out of the network) as quickly as possible, typically within three to six cycles.
4. Include section **480-108-020(1)(b)(Viii)** as section **480-108-020(1)(a)(x)** so that Tier 1 and Tier 2 applications share the same network restrictions.

Tacoma Power thanks you for considering these suggestions to **WAC 480**.

Sincerely,

Mark Pigman, P.E.  
T&D System Planning  
Tacoma Power  
3628 S 35th St  
Tacoma, WA 98405