

Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Allumia
 Alternative Energy Resources Organization
 American Rivers
 Backbone Campaign
 Beneficial State Bank
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Centerstone
 Citizens' Utility Board of Oregon
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 CleanTech Alliance
 Climate Solutions
 Community Action Center of Whitman County
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Earth and Spirit Council
 Earth Ministry
 Ecova
 eFormative Options
 Energy350
 Energy Savvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 EQL Energy
 Forth
 Home Performance Guild of Oreg
 Home Performance Washington
 Housing and Comm. Services Agency of Lane Co.
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 Interfaith Network for Earth Concerns
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Montana River Action
 National Center for Appropriate Technology
 National Grid
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest Energy Efficiency Council
 NW Natural
 OneEnergy Renewables
 Opower
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Energy Fund
 Oregon Environmental Council
 Oregon Physicians for Social Responsibility
 OSEIA
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation Inc.
 Portland General Electric
 Puget Sound Advocates for Retired Action
 Puget Sound Cooperative Credit Union
 Puget Sound Energy
 Renewable Northwest
 Save Our wild Salmon
 Seattle City Light
 Seinergy
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Small Business Utility Advocates
 Smart Grid Northwest
 Snake River Alliance
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeast Idaho Community Action Partners
 Spark Northwest
 Spokane Neighborhood Action Partners
 Sustainable Connections
 The Climate Trust
 The Energy Project
 UCONS, LLC
 Union Of Concerned Scientists
 United Steelworkers of America, District 12
 US Green Building Council, Idaho Chapter
 Washington Environmental Council
 Washington Local Energy Alliance
 Washington Physicians for Social Responsibility
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps



NW Energy Coalition
 for a clean and affordable energy future

November 17, 2017

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

Re: Docket No. UE-171033 – Comments of NW Energy Coalition regarding Rule Making to Implement Rules Regarding the Utilities and Transportation Commission's Jurisdiction and Regulation of Community Solar Companies.

Dear Mr. King,

The NW Energy Coalition appreciates the opportunity to respond to the questions posed by the Commission regarding the Commission's jurisdiction and regulation of community solar companies in Docket UE-171033 on October 19, 2017. Having very little real-world experience with community solar projects, our comments at this time are brief. We intend to remain involved in this process, as there will clearly be other questions and concerns that arise as the rules are amended.

Q1. Consumer rules for electric companies are found in Washington Administrative Code (WAC) 480-100-103 through 480-100-199. Based on your understanding of community solar company business practices, are there any sections of WAC 480-100 that should not be applied to the new consumer protection rules and why? Are there additional consumer protection issues that we should address?

Response 1. Since participants in community solar projects continue to be customers of the utility, the rules would still apply to the utility as they do now. However, at least several rules may need to be modified to better accommodate community solar projects;

WAC 480-100-103 Information to consumers could be broadened to include information on community solar projects interconnected with that utility. Information on participation costs, management or administration fees and operations should be provided in a clear and transparent fashion to all customers, either by the utility or the administrator.

WAC 480-153 Disclosure of private information may make it more difficult for customers to participate in a community solar project; this section may impose barriers to non-utility administrators locating possible customer participants or communicating with a utility' customers about non-profit or public housing administered projects.

WAC 480-100-173 Electric utility responsibility for complaints and disputes may not work as written. Customers may have disputes with the administrator, rather than the utility. Clarification is needed on how those disputes should be handled.

Q2. We examined WAC 480-14 as an example of rules for applications; reporting; fees; and suspension, cancellation, and reinstatement of permits. Specifically, we looked at WAC 480- 14-140, 480-14-150, 480-14-180, 480-14-190, 480-14-220, 480-14-230, and 480-14-999. Based on your understanding of community solar company business practices, are there other rules that should be considered? In addition, which rules do you disagree with and why?

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Response 2. Since the community solar projects will be administered and managed by a utility, a utility subsidiary, a non-profit or a public housing entity, it seems the registrations should be as comprehensive and straightforward as possible.

Q3. ESSB 5939 identifies community solar projects as no larger than 1000 kilowatts with at least 10 participants. If a project has fewer than 10 participants, does that project need to be included on the list published by the commission?

Response 3: The law calls for “all entities that organize and administer community solar projects” (section 7(10)(a) and (b)), to be published, no matter the size of the project or number of participants in a project. It would be useful to also publish *all* the community solar projects each entity organizes, as well, if the entity administers more than one project.

Q4. Based on your understanding of community solar company business practices, are there other rules that should be considered? Which rules do you disagree with and why?

Response 4: The disclosures required in new section 7(3) through (8) may need to be explained further in the development of rules. For example, what constitutes “fair and non-discriminatory” opportunities for participation, or what constitutes “a reasonable fee” to cover organizing and administration costs and how will that be presented to customers as an impact on bills.

Since the cost cap for the entire solar program in Washington is low enough that parties are worried the incentive will be exhausted in a relatively short time, we urge the Commission to adopt rules as expeditiously as possible, so projects may be developed.

If you have any further questions, please contact us.

Cordially,

Joni Bosh

Senior Policy Associate
NW Energy Coalition
811 1st Avenue, Suite 305
Seattle, WA 98104
joni@nwenergy.org
206-735-2720 cell
206-621-0094 office

