

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**UE-112133**

In the Matter of

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Review Standards for Interconnection  
with Electric Generators in WAC 480-  
108.

Initial Comments of Renewable  
Northwest Project

Renewable Northwest Project (RNP) appreciates the opportunity to comment on the rules for interconnection with electric generators in Washington Administrative Code (WAC) 480-108. RNP hopes these rules can be updated in a manner that allows for a more streamlined and affordable interconnection process for renewable energy distributed generation (DG) projects, while minimizing adverse consequences for grid safety and reliability. In response to the Preproposal Statement of Inquiry filed with the Code Reviser by the Washington Utility and Transportation Commission (WUTC or “Commission”) on December 21, 2011, we submit the following brief scoping comments. We believe there are multiple straightforward and relatively simple changes that could be made to WAC 480-108 that would substantially improve the ability of DG projects to interconnect in a timely and affordable manner, while having no adverse consequences for grid safety or reliability.

Specifically, we recommend that the Commission consider:

- adopting tiered costs for interconnection based on project size;
- implementing a standardized timeline for interconnection;

- ❑ prohibiting the requirement for additional insurance for generators of 1MW of nameplate capacity or less; and
- ❑ prohibiting the requirement for external disconnect switches for small inverter-based DG systems.

Adopting these recommendations provides an opportunity for greater consistency with the interconnection standards in Oregon,<sup>1</sup> improving uniformity for contractors working across state lines and for utilities operating in both Oregon and Washington. For example, Oregon’s small generator interconnection rules do not require an external disconnect switch for inverter-based systems up to 25kW in size and also do not require “additional” liability insurance for interconnecting generators (generators over 200kW in size must have general liability insurance).<sup>2</sup> These rules contributed to Oregon receiving a “B” grade for interconnection standards in the 2011 edition of *Freeing the Grid*,<sup>3</sup> a publication comparing net-metering and interconnection standards amongst states.

In general, RNP looks to the Interstate Renewable Energy Council (IREC) for nationwide expertise on detailed best practices for interconnection standards, and encourages the Commission to do the same. In its opening comments for this docket,<sup>4</sup> IREC

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<sup>1</sup> Oregon’s interconnection standards for distributed generators are divided into two parts: net-metering rules (Oregon Administrative Rules 860-039) and small generator interconnection rules (Oregon Administrative Rules 860-082).

<sup>2</sup> *Freeing the Grid: Best Practices in State Net Metering Policies and Interconnection Procedures: 2011 Edition*. Contributing Authors: The Interstate Renewable Energy Council, The Vote Solar Initiative, the North Carolina Solar Center and the Network for New Energy Choices. Available at: <http://www.newenergychoices.org/uploads/FreeingTheGrid2011.pdf>.

<sup>3</sup> *Id.*

<sup>4</sup> Washington Utilities and Transportation Commission Docket UE-112133: Filing of Comments of the Interstate Renewable Energy Council on the Utilities and Transportation Commission’s Proposed Rulemaking on Generator Interconnection Procedures. Filed January 30, 2012 by Jason Keyes via email.

provided a list of ten proposals for interconnection reform, which expand on its recommendations made in Docket UE-110667. (In Docket UE-110667, RNP and the NW Energy Coalition supported IREC's comments and recommendations regarding interconnection standards.<sup>5,6)</sup> IREC's ten proposals in this docket align with RNP's recommendations above, and we support IREC's approach to interconnection reform in Washington State. We look forward to engaging further in Docket UE-112133 and hope that the Commission will include our preliminary recommendations listed above, and those of IREC, in its consideration for potential rules changes to WAC 480-108.

Thank you for the opportunity to comment. Please direct subsequent electronic communications in this docket to the RNP staff identified below.

Renewable Northwest Project  
421 SW 6<sup>th</sup> Ave, Suite 1125  
Portland, OR 97204  
(503) 223-4544

Adam Schumaker  
Policy Associate  
[adam@rnp.org](mailto:adam@rnp.org)

Megan Walseth Decker  
Senior Staff Counsel  
[megan@rnp.org](mailto:megan@rnp.org)

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<sup>5</sup> Washington Utilities and Transportation Commission Docket UE-110667: Comments on Behalf of Renewable Northwest Project and NW Energy Coalition from Danielle Dixon (via email). Filed July 15, 2011.

<sup>6</sup> Washington Utilities and Transportation Commission Docket UE-110667: Supplemental Comments on Behalf of Renewable Northwest Project and the NW Energy Coalition from Danielle Dixon (via email). Filed August 8, 2011.