

January 30, 2012

**Comments of the Washington Public Utility Districts Association, Washington Rural Electric Cooperative Association, and Association of Washington Cities**

**RE:** Docket No UE-112133, Review Standards for Interconnection with Electric Generators in WAC 480-108

The Washington Utilities and Transportation Commission recently opened a rulemaking docket (#112133) to review their existing interconnection standards described as follows: *“The Commission intends to focus this rulemaking specifically on requirements in the existing rules that may no longer be necessary due to technological changes, impose a significant burden on interconnection, and that, if modified, would reduce the costs for interconnection and accelerate the development of distributed generation systems, without unduly shifting costs between ratepayers or classes.”* And further *“ The UTC will provide notice of the rulemaking broadly to all interested persons, including investor-owned utilities in the state, as well as the Department of Commerce, the Department of Labor and Industries, **consumer-owned utilities** and those electric generators seeking to interconnect with electric utilities.”*

As the Commission may recall, in 2006 Washington Public Utility Districts Association (WPUDA), Puget Sound Energy and Clark Public Utilities, in close coordination with the Association of Washington Cities (AWC) and the Washington Rural Electric Cooperative Association (WRECA) and other investor-owned-utilities, led a cooperative and very successful effort between public and private utilities and other stakeholders to develop and recommend interconnection standards for electric generators up to 20 MW on distribution systems. That model rule was presented to the UTC and consumer-owned utility governing boards for their consideration and possible adoption. The UTC adopted those standards virtually intact as did most, if not all, consumer-owned utility governing boards.

The 2006 process allowed and encouraged technical people and other stakeholders, including operations and engineering staff to “speak freely” in a roundtable setting and work through the highly complex engineering, safety, reliability and network issues that must be addressed in any interconnection standard rule, and provided a forum for efficient development of the checklist, application packet and other materials that were contained in the submission to the UTC and governing boards.

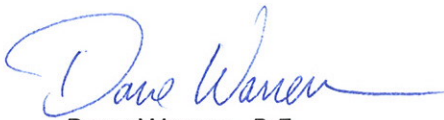
WPUDA, WRECA and AWC (Joint Publics) are suggesting to the UTC, with your encouragement, that we convene, facilitate or participate in an effort similar to the 2006 process, perhaps in conjunction with an investor-owned utility representative if they are willing to participate. The

effort would not technically be under the formal UTC CR 101 process, but would address and stay within the directions provided by the CR 101. Other stakeholders that would normally participate in a Commission process would be invited to take part in this process and we would request the UTC, if supportive of this effort, encourage their participation.

As before, the workgroup as described would provide regular updates to all parties and present final recommendations to the Commission in your appropriate process and, through our associations or other methods, to the governing boards of consumer-owned utilities, as appropriate to their processes. Clearly if the UTC believed that this effort was not utilizing an open process and would not or ultimately did not deliver a satisfactory result, the UTC could resume the more formal UTC process.

Should you agree, we would work to schedule a first organizational meeting of this group sometime in mid-to-late February with an initial progress report to the respective entities in the later March to April time frame. We look forward to working with all parties to conduct this timely review of the interconnection standards.

Sincerely,



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