

**From:** Heather Rhoads-Weaver [mailto:heather@eformativeoptions.com]  
**Sent:** Wednesday, November 13, 2013 4:58 PM  
**To:** Public Involvement (UTC)  
**Subject:** Comment on Distributed Generation UE-131883

I was not able to attend today's Open Meeting on Distributed Generation but would like to state my agreement with Terry Meyer's comments below, and also express support for the UTC's involvement in regulating distributed energy resources.

In addition, I would like to raise consumer protection concerns with the third party lease model, and for distributed wind turbines recommend adding the requirement that the equipment be certified by an accredited certification organization such as the Small Wind Certification Council (<http://www.smallwindcertification.org/certified-turbines/>) or Intertek (<http://www.intertek.com/wind/small/directory/>). I would be happy to provide more information about how this type of requirement is applied by numerous other states, such as with the Interstate Turbine Advisory Council's unified list (<http://www.cleanenergystates.org/projects/ITAC/itac-unified-list-of-wind-turbines/>).

While a fast-track small claims process might help somewhat, vigilance is warranted due to poor business practices, underperformance and failures seen all too often in this sector (see for example: <http://ci.ellensburg.wa.us/documentcenter/view/3030>, <http://www.bizjournals.com/twincities/news/2013/02/13/renewable-energy-sued-wind-turbines.html> and [http://wfcourier.com/business/local/ill-wind-farmers-find-problems-with-wind-power-generators/article\\_22a78c67-1493-5916-9eab-4fd4c822f52e.html](http://wfcourier.com/business/local/ill-wind-farmers-find-problems-with-wind-power-generators/article_22a78c67-1493-5916-9eab-4fd4c822f52e.html)).

Thank you for your consideration and time on this issue,  
Heather



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**From:** Terrance Meyer [mailto:terry@cascadecommunitywind.com]  
**Sent:** Wednesday, November 13, 2013 10:52 AM  
**To:** Heather Rhoads-Weaver  
**Subject:** Re: Fwd: Cost recover comment

sent this comment on their generic comments site

UE-131883

Not able to attend today's meeting I would like to make comment.

While I am sure you will hear many benefits of distributed energy, as well as resistance from utilities I would like to offer an overarching comment.

Simply that the availability of affordable and desirable distributed generation technologies today is very different than the age when giant sources of energy far from loads was more desirable. The most useful and natural form of a utility today is different from the legacy we have inherited.

We need the UTC to manage the transition to a utility system that includes more locally sources of energy at scales suited to local loads (Under 5 MW as defined in I937 is a fine cut off but 20 MW and 2 MW have also been used and also both have merit. These sources of energy since they involve values other than crude supply of electrons should be available for local development.

Utilities will need to shift to serving not only load customers but generation customers and those that both generate and consume with similar levels of service. This means an evolution away from utilities being a monopoly on all electrons generated and provided to being more of a transmission, distribution, and billing service.

This will not be desirable for utilities because their profit model depends on getting a return on capital. With more of the generation resources being owned by local people the total capital for the utility to ear profit on will by necessity shrink over time. Fair access to the grid and market is essential for a just and most useful utility system. Utilities need to be able to exist in a new mode of service provision while giving fair access to the marketplace. Some of this will require a firm hand by the UTC. Good luck.

Terry

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