



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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September 3, 2025

**NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS
(By October 17, 2025)**

Re: Rulemaking re: Standard Voltage and Permissible Variation under WAC 480-100-373,
Docket UE-250608

TO ALL INTERESTED PERSONS:

On March 11, 2025, an individual trained as an engineer (Mr. Skog), filed a petition with the Washington Utilities and Transportation Commission (Commission) to initiate a rulemaking to amend the language of WAC 480-100-373 (Petition).

The Petition provided the following background to explain the perceived ambiguity, which Mr. Skog argued has led to conflicting interpretations:

Maintaining a consistent and stable voltage level is a fundamental responsibility of an electric utility. Each utility files a tariff stating its standard service voltages. WAC 480-100-373 establishes allowable voltage tolerances for electric utilities serving customers in Washington State. When voltage levels fall outside these requirements, an investigation is necessary to identify the cause and implement a solution. The issue often stems from a combination of utility-owned and customer-owned equipment. Determining equipment ownership and control is essential for developing an effective resolution.

A recent low-voltage investigation revealed that the electric service provided by the utility frequently dropped below 95% of the stated tariff voltage for 15 minutes or longer when measured at the utility revenue meter. During the investigation and mitigation, the utility asserted compliance with WAC 480-100-373 by maintaining the feeder voltage (7,200 volts) within $\pm 5\%$ of nominal. However, we contend that WAC 480-100-373 should be applied to the serving voltage—480 volts in this case—rather than the primary voltage.

The discrepancy between these interpretations makes managing voltage drops caused by the transformer challenging. In most cases, the utility owns and sizes the transformer, leaving the customer with no access or control. In this specific low-voltage investigation, the utility determined that the customer's load caused excessive voltage drop across the transformer while the transformer's input voltage remained within WAC requirements. It is our contention that WAC 480-100-373 was to be applied to the service voltage, (transformer output) not the feeder voltage (transformer input).

The Petition proposes that the Commission amend WAC 480-100-373 to “ensure a universal application” among utilities by specifying that voltage stability is measured at the point of service.

On May 14, 2025, the Commission entered Order 01, Order Denying Petition in Favor of Commission-Initiated Rulemaking in Docket UE-250337. Acknowledging the harm caused by the ambiguity in the rule, the Commission stated, “We nevertheless deny the Petition in favor of initiating a more comprehensive rulemaking that will better enable the Commission to consider the views of all industry stakeholders.”

On September 3, 2025, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to clarify the extent to which WAC 480-100-373 requires utilities to maintain its delivered voltage, measured at the point of service, with a maximum total allowable variation.

The Commission is now seeking input from the public and interested parties.

The preproposal statement of inquiry (CR-101), as filed with the Code Reviser, is available for inspection on the Commission's website at <https://www.utc.wa.gov/casedocket/2025/250608/docsets>. The CR-101 announces the plan to write rules, defines the scope of potential proposed changes, and invites the public to participate. If you are unable to access the Commission's web page and would like an electronic copy of the CR-101 emailed to you, please contact the Records Center at (360) 664-1234.

Documents related to this Commission initiated rulemaking will be filed under Docket UE-250608.

QUESTIONS FOR CONSIDERATION

Written comments will be accepted until 5 p.m., October 17, 2025. The Commission requests written comments focusing on the following questions:

1. Do you believe there is ambiguity in the Commission's current rules about whether WAC 480-100-373 regulates the service voltage (transformer output) or the feeder voltage (transformer input)? Please describe why or why not.

2. Please describe how customer-owned equipment can affect the voltage at various levels of the utility's distribution system.
3. What are the differences are in measuring service voltage and feeder voltage?
4. Regulated companies: What are your current practices for investigating the cause of standard voltage disruptions?
5. In a scenario where resolving chronic standard voltage disruptions is achieved with maintenance, upgrades, or replacement of utility-owned equipment, and no customer equipment is involved with resolving the issue, should the utility bear the full cost of resolving the disruption?
6. In what scenarios should costs to resolve standard voltage disruptions be shared between the customer and utility?
 - a. What methodology should be used to allocate the shared costs?
7. What responsibilities should customers bear for maintaining standard voltage?
8. Should WAC 480-100-373 specify that regulated utilities must maintain their delivered voltage, measured at the point of service, within +/- 5 percent of their tariff-listed voltage, with a maximum total allowable variation not exceeding 8 percent, and specifying that the customer is responsible for managing voltage at all points beyond the point of service?

WRITTEN COMMENTS

The Commission gives notice of the opportunity to submit written comments no later than **5 p.m., October 17, 2025**.

Pursuant to WAC 480-07-250(3), written comments must be submitted in electronic form, specifically in searchable .pdf format (Adobe Acrobat or comparable software). As provided in WAC 480-07-140(5), those comments must be submitted via the Commission's web portal at www.utc.wa.gov/e-filing. If you are unable to submit documents via the portal, you may submit your comments by email to the Commission's Records Center at records@utc.wa.gov or by mailing or delivering an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket number of this proceeding (Docket UE-250608).
- The commenting party's name.
- The title and date of the comment or comments.

The Commission will post on its web site all comments that are provided in electronic format. The web site is located at <https://www.utc.wa.gov/casedocket/2025/250608/docsets>.

If you are unable to file your comments electronically the Commission will accept a paper document. If you have questions regarding this rulemaking, you may contact Payton Swinford, Energy Policy Advisor at (360) 489-4044, or by email at payton.swinford@utc.wa.gov.

NOTICE

If you do not want to comment now, but do want to receive future information about this rulemaking, please notify the Executive Director and Secretary in one of the ways described above and ask to be included on the mailing list for Docket UE-250608. If you do not do this, you might not receive further information about this rulemaking.



JEFF KILLIP
Executive Director and Secretary