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Washington Utilities and Transportation Committee  
P.O. Box 47250  
Olympia, WA 98504-7250

STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

Reference Docket No. 051106 Rules for customer owned generation facilities.

Attn: Dick Byers

Dear Sir:

Thank you for the opportunity to attend the Dec. 2<sup>nd</sup> workshop. I found it interesting and was encouraged to see the various parties in general alignment on the rules for 25 KW and under. This is certainly an upgrade from a few years ago.

Secondly, I wish to express my appreciation to the WUTC for taking a leadership role in this area. I do have a concern that your limited jurisdiction will limit the effectiveness of this leadership. Do you know of someone in the executive or legislative branches that I could contact about expanding your jurisdiction? As you probably know, the US Dept. of Energy has identified a widening gap between IOU,s and publics in their level of receptivity to alterative energy. (The publics way behind!)

While I am a strong advocate of alternative energy, I was dismayed by the lack of understanding on the part of the solar lobby of the problems the utilities face, particularly in terms of impact on protective relaying and power quality. These issues need to be resolved based on sound engineering practices and not on political posturing and lobbying. In fact, the utility willingness to ignore these issues on 25KW and under surprised me a little but is understandable based on the 25 KW cap.

The issue of impact on utility relaying can not be ignored when rules are established for larger sized customer generation. Conversely, power quality will not be an issue since inverter connection stops (at this time) before 25 KW is reached. No doubt, the rules for 25KW up will be much more difficult to establish. The rate structure, essentially integral to the net metering law, must be addressed seperately in the over 25KW area. This will be a sticky wicket.

While small generation, inverter connected, is politically popular with the solar and green lobby groups, the actual impact on the electrical system, in terms of MW per annum is minimal compared to the potential impact of cogeneration. For this reason the establishment of these rules in of critical importance.

Please advise me when the next workshops are to be held on this subject. I am also available for free consultation by any of your staff at any time.

Thanks again for the assumption of leadership....something rare in government today.

Yours truly,

Parker V. Holden