## December 23, 2011

# NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS (By Monday, January 30, 2012)

Re: Review Standards for Interconnection with Electric Generators in WAC 480-108, Docket UE-112133

### TO ALL INTERESTED PERSONS:

On December 21, 2011, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider revising the standards for interconnecting electric generators in the service territories of electric investor-owned utilities in Washington Administrative Code (WAC) 480-108. The Commission filed the CR-101 under Docket UE-112133.

In the spring of 2011, the Washington House Technology, Energy, and Communications Committee requested that the Commission conduct an interim study on the potential for distributed generation in the territories of investor-owned electric utilities. In Docket UE-110667, the Commission developed a set of policy recommendations based upon that study, including a recommendation that the Commission initiate a rulemaking to consider changes to the rules for interconnecting with utility electric systems (WAC 480-108). In 2006, the Commission adopted two sets of rules (WSR 06-07-017, codified in WAC 480-108) addressing electrical standards to ensure safety and reliability, and responsibility for the costs of interconnection. During the Commission's interim study in the summer of 2011, many commenters suggested that technological advances made some of the current requirements redundant, such as the requirements for an external disconnect switch and additional insurance. In addition, modifications to the system capacity sizes reflected in the two sets of rules may enable streamlined or simplified interconnection requirements for larger systems. 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

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development of distributed generation systems, without unduly shifting costs between ratepayers or classes.

The CR-101, as filed with the Code Reviser, is available for inspection on the Commission's website at <a href="www.utc.wa.gov/112133">www.utc.wa.gov/112133</a>. If you are unable to access the Commission's web page and would like a copy of the CR-101 mailed to you, please contact the Records Center at (360) 664-1234.

#### WRITTEN COMMENTS

Written comments on the proposal to review the rules for interconnection with electric generators, as well as changes commenters would like to see in the rules must be filed with the Commission no later than **5:00 p.m.**, **Monday**, **January 30**, **2012**. The Commission requests that comments be provided in electronic format to enhance public access, for ease of providing comments, to reduce the need for paper copies, and to facilitate quotations from the comments. You may submit comments via the Commission's Web portal at <a href="www.utc.wa.gov/e-filing">www.utc.wa.gov/e-filing</a> or by electronic mail to the Commission's Records Center at records@utc.wa.gov. Please include:

- The docket number of this proceeding (UE-112133).
- The commenting party's name.
- The title and date of the comment or comments.

An alternative method for submitting comments is by mailing or delivering an electronic copy to the Commission's Records Center on a 3 ½ inch, IBM-formatted, high-density disk, in .pdf Adobe Acrobat format or in Word 97 or later. Include all of the information requested above. The Commission will post on its web site all comments that are provided in electronic format. The web site is located at <a href="https://www.utc.wa.gov/112133">www.utc.wa.gov/112133</a>.

If you are unable to file your comments electronically or to submit them on a disk, the Commission will accept a paper document. If you have questions regarding this rulemaking, you may contact staff lead, Elizabeth Osborne, at (360) 664-1209, or by email at <a href="mailto:eosborne@utc.wa.gov">eosborne@utc.wa.gov</a>.

Stakeholders will have further opportunity for comment. Information about the schedule and other aspects of the rulemaking, including comments, will be posted on the Commission's website as it becomes available. If you wish to receive further information on this rulemaking you may:

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- (1) Call the Commission's Records Center at (360) 664-1234
- (2) Email the Commission at <a href="mailto:records@utc.wa.gov">records@utc.wa.gov</a>
- (3) Mail written comments to the address below

When contacting the Commission, please refer to Docket UE-112133 to ensure that you are placed on the appropriate service list. The Commission's mailing address is:

Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

### **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-112133. If you do not do this, you might not receive further information about this rulemaking.

Sincerely,

DAVID W. DANNER Executive Director and Secretary