

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of
Petitioner,

John E. Skog, P.E.,

To Adopt Rules to Amend WAC 480-
100-373

DOCKET UE-250337

ORDER 01

ORDER DENYING PETITION IN
FAVOR OF COMMISSION-
INITIATED RULEMAKING

BACKGROUND

- 1 On March 11, 2025, Mr. Skog, an engineer, filed a petition with the Washington Utilities and Transportation Commission (Commission) to initiate a rulemaking to amend the language of WAC 480-100-373.
- 2 Mr. Skog's petition provides the following background to explain the perceived ambiguity, which he argues 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).

3 This matter was docketed as UE-250337 on May 14, 2025.

DISCUSSION

4 Within 60 days after receiving a petition for rulemaking, the Commission must either:

(a) deny the petition in writing, stating (i) its reasons for the denial, specifically addressing the concerns raised by the petitioner, and, where appropriate, (ii) the alternative means by which it will address the concerns raised by the petitioner, or (b) initiate rulemaking proceedings in accordance with RCW 34.05.320.¹

5 We acknowledge the ambiguity identified in the Petition and the harm it may cause. 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.

6 Mr. Skog 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.

7 The Commission may conclude that some or all of this request should be incorporated into the Washington Administrative Code, but we do not have that option at this point. To initiate rulemaking proceedings in response to the Petition, RCW 34.05.320 requires that the Commission formally propose the rules in that petition as the agency's own and schedule a hearing on the adoption of those rules. We decline to take that action and find that the Commission should develop a more complete record, including input from stakeholders and interested persons, before proposing any rules to amend WAC 480-100-373.

¹ See RCW 34.05.330.

- 8 Accordingly, the Commission denies the Petition but will initiate a rulemaking in a separate docket by August 1, 2025, to determine whether WAC 480-100-373 should be amended to specify whether it is meant to apply to service voltage or feeder voltage.

ORDER

THE COMMISSION ORDERS:

- 9 (1) The Petition of Mr. Skog for a rulemaking to amend WAC 480-100-373 is DENIED.
- 10 (2) The Commission will initiate a rulemaking in a separate proceeding by August 1, 2025, to determine if WAC 480-100-373 should be amended.

DATED at Lacey, Washington, and effective May 14, 2025.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



BRIAN RYBARIK, Chair



ANN E. RENDAHL, Commissioner



MILTON H. DOUMIT, Commissioner