

**VIA ELECTRONIC MAIL**

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February 28, 2007

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

Re: Public Utility Regulatory Policies Act Standards  
Standards for Interconnection to Electric Utility Delivery Systems  
Docket UE-060649

Dear Ms. Washburn:

On January 25, 2007, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments (Notice) on the draft amended rules governing the interconnection of customer-owned generating facilities to investor-owned electric utility delivery systems. Avista Corporation and Puget Sound Energy, Inc. provide the following joint comments in response to the Notice.

**General Comments**

In general, both Avista Corporation and Puget Sound Energy, Inc. support the draft interconnection rule as developed by the Commission. Additionally, after review of PacifiCorp's comments, both Avista Corporation and Puget Sound Energy, Inc. generally support PacifiCorp's comments filed in this docket in response to the Notice.

**Specific Comments**

Avista Corporation and Puget Sound Energy offer the following changes to the language provided in the draft rule language.

**WAC 480-108-010 Definitions.**

WUTC draft amended language:

**“Certificate of completion”** means the form described in WAC 480-108-050 that must be completed by the applicant or interconnection customer and the electrical inspector having jurisdiction over the installation of the facilities indicating completion of installation and inspection of the interconnection.

Avista and PSE proposed language:

**“Certificate of completion”** means the form described in WAC 480-108-050 that must be completed by the applicant or interconnection customer and the electrical inspector having jurisdiction over the installation of the facilities indicating completion of installation and inspection of the interconnection. The certificate of completion as provided in WAC 480-108-050 requires review and written preapproval by the electrical company before the applicant’s or interconnection customer’s generating facility can be connected or operated in parallel with the electrical company’s electric system.

**WAC 480-108-020 Technical standards for interconnection.**

**(2) Specific interconnection requirements**

WUTC draft amended language:

**(d)** Nominal voltage and phase configuration of the applicant’s generating facility must be compatible with the electrical company’s system at the point of common coupling.

Avista and PSE proposed language:

**(d)** Nominal voltage and phase configuration of the applicant’s generating facility require review and written preapproval by the electrical company for compatibility ~~must be compatible~~ with the electrical company’s system at the point of common coupling.

**WAC 480-108-020 Technical standards for interconnection.**

**(2) Specific interconnection requirements**

WUTC draft amended language:

**(e)** The applicant must provide evidence that its generating facility will never result in reverse current flow through the electrical company’s network protectors.

Avista and PSE proposed language:

(e) The applicant must provide evidence that its generating facility will never result in reverse current flow through the electrical company's system at the point of common coupling network protectors.

**WAC 480-108-020 Technical standards for interconnection.**

**(2) Specific interconnection requirements**

WUTC draft amended language:

(g) Interconnection to grid network distribution systems is not allowed.

Avista and PSE proposed language:

(g) Interconnection to grid network distribution systems is prohibited unless allowed by the electrical company not allowed.

**WAC 480-108-030 Application for interconnection.**

WUTC draft amended language:

**(3) Application prioritization.**

All generation interconnection requests pursuant to this chapter will be prioritized by the electrical company in the same manner as any new load requests. Preference will not be given to either request type. The electrical company will process the application and provide interconnection in a time frame consistent with the average of other service connections.

Avista and PSE proposed language:

**(3) Application prioritization.**

All generation interconnection requests pursuant to this chapter will be prioritized by the electrical company in the same manner as any new load requests. Preference will not be given to either request type. The electrical company will process the application and provide interconnection of the same type in a time frame consistent with the average of other service connections.

**WAC 480-108-050 Certificate of Completion.**

WUTC draft amended language:

All generating facilities must obtain an electrical permit and pass electrical inspection before they can be connected or operated in parallel with the electrical company's electric system. The interconnection customer must provide to the electrical company

written certification that the generating facility has been installed and inspected in compliance with the local building and/or electrical codes.

Avista and PSE proposed language:

All generating facilities must obtain an electrical permit and pass electrical inspection before they can be connected or operated in parallel with the electrical company's electric system. The interconnection customer must provide to the electrical company written certification that the generating facility has been installed and inspected in compliance with the local building and/or electrical codes. The certificate of completion requires review and written preapproval by the electrical company before the applicant's or interconnection customer's generating facility can be connected or operated in parallel with the electrical company's electric system.

**WAC 480-108-070 Interconnection of Facilities Greater than 300 kW.**

WUTC draft amended language:

(1) No later than August 31, 2007, each electrical company over which the commission has jurisdiction must file interconnection service tariffs for facilities larger than 300 kW. Interconnection service, for purposes of this section, includes only the terms and conditions that govern physical interconnection to the electrical company's delivery system and does not include sale of power by the interconnecting customer or retail service to the interconnecting customer.

Avista and PSE proposed language:

(1) No later than October 31, 2007, ~~August 31, 2007~~, each electrical company over which the commission has jurisdiction must file interconnection service tariffs for facilities larger than 300 kW. Interconnection service, for purposes of this section, includes only the terms and conditions that govern physical interconnection to the electrical company's delivery system and does not include sale of power by the interconnecting customer or retail service to the interconnecting customer.

Avista Corporation and Puget Sound Energy appreciate the opportunity to present their viewpoints on these issues in the Commission's draft amended rule. Please direct any questions regarding these comments to the undersigned.

Sincerely,

**Avista Corporation**

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