



Northwest CHP Application Center

Combined Heat and Power for the states of
Alaska, Idaho, Montana, Oregon and Washington
in cooperation with the U.S. Department of Energy



February 27, 2007

To: Record Center and Dick Byers, Utility and Transportation Commission

From: Dave Sjoding, Team Leader

Subject: Docket UE-060649 and Interconnection Rulemaking for systems up to 300 kW

The following comments are provided regarding the draft interconnection rules for systems up to 300 kW:

WAC 480-108-070

Clean heat and power (CHP) systems in the state of Washington are generally sized beginning at 300 kW capacity and above. For example, the Vander Haak Dairy digester CHP system is on the smaller end of the scale. It is above 300 kW that CHP stakeholders become more seriously interested in the UTC interconnection rulemaking process. Proposed WAC 480-108-070 gives the impression that there will not be a UTC interconnection process above 300 kW. This would be unfortunate. There are a number of interconnection issues above 300 kW that need to be addressed. For example, the George DeRuyter Dairy's interconnection process with Pacific Power has been broadly discussed in a number of quarters. A separate interconnection rulemaking process – that is clearly presented as an above 300 kW – interconnection process is recommended in lieu of proposed WAC 480-108-070;

An additional comment regarding WAC 480-108-070 (6) is needed. For transmission congested areas, such as those included in the National Electric Transmission Congestion Study http://www.oe.energy.gov/DocumentsandMedia/Congestion_Study_2006-9MB.pdf, or for specific transmission lines, or weak feeder lines, it is recommended that either a) The impacted utilities provide this information on the web – including basic information needed for quantification; or b) Congested areas and weak lines be deemed to have quantifiable benefits. This will help set an initial factual basis for further appropriate cost sharing.

WAC 480-108-010

The definition of “grid network” embedded within the definition of “network distribution system (grid or spot)” is unclear. A separate definition with more explanation would be helpful;

WAC 480-108-020 (2) (g)

The abrupt blocking in WAC of all grid network interconnection, without recourse or feasibility study, is extreme. Our understanding of this part of the proposed rule is that it would block all PV and CHP

925 Plum St SE, Bldg 4 • P.O. Box 43165 • Olympia, WA 98504-3165
(360) 956-2004 • Fax (360) 236-2004 • TDD: (360) 956-2218

Cooperating agencies: Washington State University Extension Energy Program, U.S. Department of Energy, Alaska Energy Authority, Idaho Department of Water Resources Energy Division, Montana Department of Environmental Quality Energy Program and Oregon Department of Energy

systems of any size if two or more substations can supply power. A serious amendment is needed to provide a pathway forward for projects that are located in this setting.

WAC 480-108-035

It is assumed that this WAC applies to the less than 300 kW systems. We recommend a parity of timelines – between the utility and the applicant – based on the required 30-day response of the applicant. The utilities should also be required to respond within 30 days.