

[Service Date July 26, 2012]

July 26, 2012

**NOTICE OF REPORT FROM INTERCONNECTION STANDARDS  
WORKGROUP**

**And**

**NOTICE OF OPPORTUNITY TO SUBMIT COMMENTS  
(Due by the close of business on Friday, September 7, 2012)**

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

**TO ALL INTERESTED PERSONS:**

Following the workshop in this rulemaking proceeding held on March 29, 2012, a number of interested persons worked collaboratively to evaluate proposals and recommend changes to WAC 480-108, the rules governing standards for interconnection with electric generators. These interested persons formed the Interconnection Standards Workgroup (Workgroup), chaired jointly by representatives of the Washington Public Utility District Association, Puget Sound Energy, Inland Power and Light Company and the Interstate Renewable Energy Council. The Workgroup filed a Report and set of model rules with the Washington Utilities and Transportation Commission (Commission) on July 13, 2012. The Report and Model Rules are available for inspection on the Commission's website at [www.utc.wa.gov/112133](http://www.utc.wa.gov/112133).

The Commission appreciates the work of the Workgroup and seeks comments on the Workgroup's proposed model rules. In addition, the Commission requests that stakeholders address the following questions regarding the proposed model rules:

1. Does the model rule language regarding electrical safety avoid potential regulatory mismatches with current and future Department of Labor and Industries rules regarding electrical safety? If not, please identify how such a mismatch could be avoided.
2. Do the model rules remove requirements in current rules from the interconnection applicant that increase the costs to the utility of interconnecting the applicant's

- generation facility? Please identify those requirements and explain if those costs unduly shift costs to utility ratepayers or between ratepayers.
3. Do the model rules add requirements to the interconnection applicant that increase the costs to the applicant of interconnection? Please identify those requirements and explain if they are unduly discriminatory or shift costs from a utility or utility ratepayers to the interconnection applicant.
  4. Are the Tier 1, 2 and 3 application and completion processes reasonable obligations for both the applicant and the utility? Please explain why or why not.
  5. Is there an industry definition of a “radial distribution circuit” as the term is used in item 3 under “Tier 1 – applicability” of the model rule?
  6. Is item 4 under “Tier 1 – applicability” of the model rule intended to reflect the requirements under current rule for generators with nameplate rating of 25 kW or less?
  7. Is it possible to implement the Tier 1 and Tier 2 portions of the model rules without modifying the existing rules to include the Tier 3 portions of the model rules?

**COMMENTS:**

Comments must be filed with the Commission no later than **5:00 p.m., Friday, September 7, 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 [www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing) or by electronic mail to the Commission's Records Center at [records@utc.wa.gov](mailto:records@utc.wa.gov). Please include:

- The docket number of this proceeding (UE-112133).
- The commenting party's name.
- The organization you represent (company, association, self, etc.)
- 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 [www.utc.wa.gov/112133](http://www.utc.wa.gov/112133). If you are unable to file your comments electronically or to submit them on a disk, the Commission will accept a paper document.

**NEXT STEPS:**

After the Commission reviews comments from additional parties concerning the Workgroup's model rules, the Commission likely will develop a set of draft rules, and will circulate these rules for comment. The Commission will hold a workshop following receipt of the comments on draft rules before developing proposed rules.

If you have questions regarding this rulemaking, you may contact David Nightingale, at (360) 664-1154, or by email at [dnightin@utc.wa.gov](mailto:dnightin@utc.wa.gov).

Sincerely,

DAVID W. DANNER  
Executive Director and Secretary