

LocalEnergyAlliance of Washington

Monday August 8, 2011

Thank you for this opportunity to provide further comments on docket UE-110667. The Local Energy Alliance of Washington (WALEA) advocates for the distributed generation industry in the state of Washington. Our comments are aimed at helping the UTC and State Legislature provide an environment for the long term growth and development of distributed generation for the benefit of all Washingtonians.

How the Commission should define distributed generation for the purpose of the study, and whether the Legislature should define distributed generation differently than in RCW 19.285.030(9);

WALEA's position is that the definition of distributed generation should be fully inclusive of all advanced and renewable distributed generation technologies below a 5 MW peak generation capacity. This includes Energy from the sun, wind, water, organic matter, waste streams, and high efficiency (say >75%) cogeneration with conventional fuels.

WALEA recognizes that there are certain impacts of some implementations of the above energy sources that are not desirable and should not be encouraged. We feel that the appropriate place to address those impacts are in permitting and other regulation if the impacts, not in excluding technologies from the definition.

The purpose or goal of distributed generation in Washington, particularly in areas of the state served by investor-owned utilities, and how the goal or goals should assist the Commission and the Legislature identify appropriate administrative or legislative proposals to encourage distributed generation.

Encouraging distributed generation serves multiple purposes which is part of the beauty of DG. The value to the state is a stack of values including:

- **3 to 10 times the economic impact per MW as compared to large installations**
- **Local job creation**
- **Broad distribution of economic benefits among many Washingtonians**
- **Development of resources not suited for larger development.**
- **Technology and geographic diversity of renewable generation has less variability as compared to all one technology in one place. Collectively diversity provides capacity.**
- **Reduced reliance on transmission system, avoiding upgrades**
- **Increases regional self sufficiency**
- **Provides customer choice.**
- **Reduces green house gasses**
- **Leverages private investment, and federal funds, building in-state infrastructure.**

Thank you



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