

From: Kevin Maas
To: [UTC DL Records Center](#)
Subject: Comment on Docket UE-171033
Date: Thursday, July 26, 2018 3:27:56 PM

Dear Commission--

I write on behalf of Glacier Energy Inc, to comment on the revised draft rules for community solar companies described in ESSB 5939.

ESSB 5939 amended RCW 82.16 to include the following definition in subsection 160:

(1) "Administrator" means the utility, nonprofit, or other local housing authority that organizes and administers a community solar project as provided in RCW 82.16.165 and 82.16.170 .

However, ESSB 5939 does not redefine the term "Administrator" when amending RCW 80.28 to add definitions for community solar in subsection 370. It is unclear why the Commission's draft rules regulating community solar companies creates a new definition for the term "Administrator" [WAC 480-xxx-002 (1) "a person or entity that organizes and administers a community solar project on behalf of a community solar company..."], or why the word must be used for such a person or entity at all. There will likely be confusion if WAC 480-xxx conflicts with or is asserted to supersede RCW 82.16; the Commission should clarify or deconflict the term it intends to use for "a person or entity that organizes and administers a community solar project on behalf of a community solar company". Alternately, the Commission should fold the role into that of "Community solar company".

Thank you for this opportunity to comment,

Kevin Maas

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