Service Date: August 15, 2025

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Petitioner

DOCKET UE-250477

ConnectDER

ORDER 01

To Adopt Rules Modifying WAC 480-108-040; Establishing a Statewide Process for Meter Socket Adapter Model Approval DENYING PETITION IN FAVOR OF COMMISSION-INITIATED RULEMAKING

BACKGROUND

- On June 16, 2025, ConnectDER, a manufacturer of meter socket adapters (MSA), filed a petition with the Washington Utilities and Transportation Commission (Commission) to initiate a rulemaking to amend the language of Washington Administrative Code (WAC) 480-108-040.
- 2 ConnectDER's petition provides the following background to explain the perceived ambiguity, which it argues has led to conflicting requirements and availability of MSAs in Washington:

[T[here is not a standardized process for utilities to test and approve new MSA types and models in Washington. Avista has shown leadership in their work to advance energy equity and expanding electrification by submitting an affiliate filing to test one MSA model that facilitates EV charger deployment. However, any consequent device approval by Avista will not apply to the majority of Washington residents in other service territories, or those who wish to use [MSAs] for deploying other DERs like rooftop solar and battery storage. This lack of state-level standardization creates inefficiencies and barriers to adoption by utilities statewide. By establishing clear guideline for approving MSA models, the Commission can drive consistency across utilities and save utilities time associated with bespoke testing for device approval.

ConnectDER suggests the adoption of a MSA approval process that would create benefits for both MSA manufacturers and utilities [by establishing]: Clear timelines [...;] Clear and consistent minimum safety standards to be

considered for approval [...; and] Defined roles and responsibilities for MSA manufacturers and utilities.¹

- ConnectDER asserts that the Commission has authority to conduct the proposed rulemaking pursuant to Revised Code of Washington (RCW) 80.01.040.² ConnectDER further notes that approximately twenty states have approved the use of MSAs, either through statute, utility programs, rulemakings, or Commission order, with three other Commissions having initiated rulemakings.³
- 4 ConnectDER proposes the following language for incorporation into WAC 480-108-040:

As used in this section:

"Meter socket adapter" means an electrical device that is installed between a residential electric meter and the meter socket, for the purpose of facilitating the deployment of customer-owned or customer-leased technology.

Authorizes installation and operation of meter socket adapters on residential electric meters, under certain conditions.

- a. An electric utility shall authorize the installation and operation of a meter socket adapter, whether owned by a residential customer or by a third-party, provided the meter socket adapter meets the following criteria:
 - (1) the meter socket adapter is qualified to be connected to the supply side of the service disconnect pursuant to the applicable provisions of the National Electric Code;
 - (2) the meter socket adapter is approved or listed by a nationally recognized testing laboratory (NRTL) and is rated appropriately for the meter socket into which it is intended to be installed;
- b. A manufacturer of a meter socket adapter, a third-party, or a residential customer shall all be allowed to install, maintain, or service a meter socket adapter or associated equipment. Only qualified personnel shall physically access the meter socket.

¹ Petition for Rulemaking pg. 6-7.

² Petition for Rulemaking pg. 8.

³ Petition for Rulemaking pg. 4-5.

- c. An electric utility shall modify its electric service requirements as necessary to implement the provisions of this section immediately after the effective date of this section.
- d. Electric utilities shall establish and publicly publish a point of contact to which device manufacturers will submit formal requests for approval.
- e. An electric utility shall approve or disapprove a meter socket adapter for installation in its service area no later than 60 days after a manufacturer or third-party submits a request for approval of specific models of the meter socket adapter. An electric utility shall provide public notice of all decisions approving or disapproving a meter socket adapter, including by posting the information on the utility's website.⁴

DISCUSSION

- Within 60 days after receiving a petition for rulemaking, the Commission either must:
 - (a) deny the petition in writing, stating (i) its reasons for the denial, specifically addressing the concerns raised by the petitioner, and, where appropriate, (ii) the alternative means by which it will address the concerns raised by the petitioner, or (b) initiate rulemaking proceedings in accordance with RCW 34.05.320.⁵
- We acknowledge the potential ambiguity of our rules as it pertains to interconnect of MSAs and other distributed energy resources, devices, adapters, and other technology. We nevertheless deny the Petition in favor of initiating a more comprehensive rulemaking that will better enable the Commission to consider the views of all industry stakeholders.
- ConnectDER proposes that the Commission amend WAC 480-108-040 to "drive consistency across utilities and save utilities time associated with bespoke testing for approval."
- The Commission may conclude that some or all of this request should be incorporated into the Washington Administrative Code, but we do not have that option at this point. To initiate rulemaking proceedings in response to the Petition, RCW 34.05.320 requires that the Commission formally propose the rules in that petition as the agency's own and

⁴ Petition for Rulemaking pg. 9-10.

⁵ See RCW 34.05.330.

⁶ Petition for Rulemaking pg. 7.

schedule a hearing on the adoption of those rules. We decline to take that action and find that the Commission should develop a more complete record, including input from stakeholders and interested persons, before proposing any rules to amend WAC 480-100-373.

Accordingly, the Commission denies the Petition but will initiate a rulemaking in a separate docket by January 31, 2026, to determine whether WAC 480-108-040 should be amended to provide clarity and consistency across utilities for adoption of MSA and other distributed energy resource technologies.

ORDER

THE COMMISSION ORDERS:

- 10 (1) The Petition of ConnectDER for a rulemaking to amend WAC 480-108-040 is DENIED.
- The Commission will initiate a rulemaking in a separate proceeding by January 31, 2026, to determine if WAC 480-108-040 should be amended.

DATED at Lacey, Washington, and effective August 15, 2025.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Connor Thompson
CONNOR THOMPSON
Director, Administrative Law Division

NOTICE TO PARTIES

This is an initial order. The action proposed in this initial order is not yet effective. If you disagree with this initial order and want the Commission to consider your comments, you must take specific action within the time limits outlined below. If you agree with this initial order, and you would like the order to become final before the time limits expire, you may send a letter to the Commission, waiving your right to petition for administrative review.

WAC 480-07-825(2)(a) provides that any party to this proceeding has 20 days after the entry of this initial order to file a petition for administrative review (Petition). Section (2)(b) of the rule identifies what you must include in any Petition as well as other requirements for a Petition. WAC 480-07-825(2)(c) states that any party may file an answer (Answer) to a Petition within 10 days after service of the petition.

WAC 480-07-830 provides that before the Commission enters a final order any party may file a petition to reopen a contested proceeding to permit receipt of evidence essential to a decision, but unavailable and not reasonably discoverable at the time of hearing, or for other good and sufficient cause. The Commission will not accept answers to a petition to reopen unless the Commission requests answers by written notice.

RCW 80.01.060(3) provides that an initial order will become final without further Commission action if no party seeks administrative review of the initial order and if the Commission fails to exercise administrative review on its own motion.

Any Petition or Response must be electronically filed through the Commission's web portal as required by WAC 480-07-140(5).