

September 7, 2012

VIA ELECTRONIC FILING

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Attention: David W. Danner
Executive Director and Secretary

RE: PacifiCorp's Comments on Review Standards for Interconnection with Electric Generators in WAC 480-108 Docket No. UE-112133

Dear Mr. Danner:

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits the following comments in accordance with the Notice of Opportunity to Comment on review standards for interconnection with electric generators issued by the Washington Utilities and Transportation Commission (Commission) on July 26, 2012, in Docket No.UE-112133.

In the notice, the Commission requested written comments addressing the report and model rules submitted by the Interconnection Standards Workgroup (Workgroup) consisting of representatives of the Washington Public Utility District Association, Puget Sound Energy, Inland Power and Light Company and the Interstate Renewable Energy Council. The Commission specifically requested input on seven questions. PacifiCorp fully supports the adoption of the model rules by the Commission. Below are the Company's responses to the questions:

Question 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.

PacifiCorp is not aware of any current regulatory mismatches related to the proposed model rule language and current Department of Labor and Industries rules regarding electrical safety.

Question 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.

The model rule language does not include any changes to the application fees that are part of the current interconnection process. Therefore, there are not any cost shifts that unduly burden utility customers.

Question 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.

The model rule language does not include any additional requirements for the interconnection applicants that will increase the cost of interconnection. As such, there is no shifting of costs nor are there unduly discriminatory costs for the interconnection applicant.

Question 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.

The Company considers the application and completion processes reasonable obligations for both the applicant and the utility. The Company believes that the creation of the Tiers will simplify the process for a majority of the applicants and move the initial application process along more quickly.

Question 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?

PacifiCorp is not aware of an industry definition for “radial distribution circuit.”

Question 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?

Yes.


Question 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?

No. There continues to be a need for a Tier 3 process, or a full study process, for projects that could potentially have an impact on the Company’s system. Tier 1 and Tier 2 streamline the application process for projects that have limited technical complexities. The Tier 3 process is essential for projects that need to have the impacts of the facility fully analyzed prior to interconnection. Even relatively small systems could have unique technical circumstances which require the Company to do additional studies. All three steps are required for safety and successful project completion.

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The Company appreciates the opportunity to provide these comments to the Commission. Any informal questions should be directed to Carla Bird at (503) 813-5269, or Carla.Bird@PacifiCorp.com.

Sincerely,

A handwritten signature in black ink that reads "William R. Griffith" followed by a stylized initial "R".

William R. Griffith
Vice President, Regulation